

City and County of San Francisco (CCSF) Comments on the Final Draft Revision to the ISO Transmission Planning Standards

The City and County of San Francisco (CCSF), through its Public Utilities Commission (SFPUC) appreciates the opportunity to comment on the final draft revisions to the ISO's Transmission Planning Standards (Final Draft). CCSF strongly supports the ISO's proposed "Extreme Event Reliability Standard" for the San Francisco peninsula and that this proposal should be submitted to the ISO Board for its approval. This standard recognizes the unique electric reliability needs of the San Francisco peninsula due to such factors as a high density urban load, location on a peninsula, potential risk of outages including from earthquakes, and challenging restoration times.¹ To these we would add San Francisco's extensive reliance on electrified transit (e.g. BART, MUNI light-rail, and the largest fleet of electric buses in the United States) as well as San Francisco's role as a major medical, financial, and high-technology center as additional reasons for an enhanced level of reliability.

As the Final Draft notes, the above criteria provide "a credible basis for considering for approval corrective action plans to mitigate the risk of outages that are beyond the reliability standards [applicable] to the rest of the ISO controlled grid."² Nor is such a designation unusual. As the Final Draft notes, the ISO previously maintained separate, and stricter, reliability standards for San Francisco recognizing its transmission constraints. Similarly, the New York ISO has adopted separate and stricter reliability standards for New York City.

The Final Draft acknowledges that planning for extreme events does not automatically mean that mitigation measures will be adopted but only that they will be evaluated and considered by the ISO. This evaluation is currently being conducted in a separate on-going phase of the ISO Transmission Planning Process. In this phase CCSF urges the ISO to broadly consider all alternatives that improve San Francisco's reliability.

<p>If you have any questions please contact Michael Hyams (mhyams@sfwater.org) at (415) 554-1590 or James Hendry (jhendry@sfwater.org) at (415) 554-1526.</p>
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¹ Final Draft, p. 11

² Final Draft, p. 11