

## **PG&E's Comments on the California ISO Transmission Planning Standards Update**

### **Introduction**

PG&E appreciates the opportunity to comment on the CAISO's Transmission Planning Standards discussed at the May 2, 2011 stakeholder meeting. PG&E supports the CAISO's initiative to review and update its planning standards document.

PG&E offers the following comments on a few of the possible changes discussed. PG&E requests the CAISO to consider these comments as some of the changes could have major impacts to system reliability, on transmission system operation, and financial costs to ratepayers.

### **Comments**

#### **1. ISO's Clarification on the Bulk Electric System**

PG&E recommends changing the clarifying statement to indicate that the CAISO planning standards also apply to non-BES facilities in the ISO-controlled grid.

CAISO's proposed definition of the Bulk Electric System (BES) to include 60 and 70 kV facilities is inconsistent with NERC criteria and definitions. NERC designates BES elements as 100 kV and greater. The ISO's objective can be achieved by applying the CAISO Planning Standards to non-BES facilities in the CAISO controlled grid without designating the 60 and 70 kV facilities as BES.

#### **2. Load interruption standard: No single contingency should result in loss of more than 250 MW of load**

PG&E believes that the CAISO should not restrict this requirement to only Category B contingencies. PG&E believes the CAISO should apply this requirement for Category C events that impact similar amounts of electric customers. PG&E suggests the CAISO to consider the overall impact of the load shedding, apart from the requirement to meet the planning standard. PG&E believes that important factors such as public safety and local economy to communities caused by sustained outages be considered as part of this standard.

#### **3. Load interruption standard: Radial loads with available emergency back-tie(s) should have their back-up tie(s) sized at a minimum of 50% of the yearly peak load**

PG&E believes this requirement is too stringent, too costly, not cost-effective, and cannot be met on a timely basis. The description "with available emergency back-tie(s)" is confusing and difficult to define. In addition, this requirement also is in conflict with the CAISO's suggested 250 MW load interruption threshold.

#### **4. New Special Protection Schemes: ISO SPS 6 – SPS should be simple and manageable – there should be no more than 6 local contingencies that trigger the SPS. The SPS should not be monitoring more than 4 system elements or variables.**

PG&E agrees that a SPS should be simple and manageable. The transmission system is already complicated and adding complicated SPS will increase the possibility of unintended operations and lower service reliability. SPS should be evaluated on a case-by-case basis rather than relying on a set formula of certain number of local contingencies and system elements.

5. **Voltage standard**

PG&E supports the standardization of low and high voltage levels for the CAISO Planning Standards. However, PG&E points out that in certain situations the proposed maximum voltage (Vmax) of 1.1 per unit (p.u.) under normal operating conditions may be considered high and will need to be addressed on a case-by-case basis. PG&E requests that the voltage standard allows exemptions for these situations.

6. **Time Allowed for Manual Readjustment: This is the amount of time required for the operator to take all actions necessary to prepare the system for the next contingency. This time should be less than 30 minutes.**

PG&E requests the CAISO to provide an explanation of how the 30 minute timeframe to prepare for the next emergency was determined. PG&E is concerned that applying this 30 minute requirement to the lower voltage facilities such as 60 and 70 kV can result in implementation of more SPS or transmission projects that may not be necessary.

**Conclusion**

PG&E appreciates the opportunity to provide comments. Should you have any questions, please contact Marco Rios at [m1r9@pge.com](mailto:m1r9@pge.com) or 415-973-8460.