

Stakeholder Comments Template

Revised Transmission Planning Standards

Submitted by	Company	Date Submitted
Garry Chinn Ying He Karen Shea	Southern California Edison	August 11, 2014

SCE appreciates participating in this CAISO stakeholder process. Please find comments below on the CAISO's Final Draft Revision to ISO Transmission Planning Standards, dated July 16, 2014 (Final Draft).

1. On page 33 of 34 of the Final Draft, the CAISO provides language discussing case-by-case assessments for extreme events. In item #3, the CAISO provides a list of risk assessment criteria it will consider for making its determination. SCE recommends the CAISO include the total amount of customers affected by the load shed prior to recommending mitigation project alternatives, thus considering the number of customers impacted due to the outage. Accordingly, please see the proposed redline addition below:

3. In considering if load shedding, where allowed by NERC standards, is a viable mitigation in either the short-term, or the long-term for local areas that would not call upon high density urban load, case-by-case assessments need to be considered. Assessments should take in consideration, but not limited to, risk assessment of the outage(s) that would activate the SPS including common right of way, common structures, history of fires, history of lightning, common substations, restoration time, coordination among parties required to operate pertinent part of the transmission system, number of resources in the area, number of customers impacted by the outage, outage history for resources in the area, retirement impacts, and outage data for the local area due to unrelated events.

It is ISO's intention to thoroughly evaluate the risk of outages and their consequences any time a load shedding SPS is proposed regardless of population density.

p. 33 of 34, CAISO Final Draft

Also, before the CAISO determines the need for an upgrade, SCE recommend the CAISO consider the role of real-time mitigation of load reduction, and operational measures such as available area generation resources and imports on other lines.

2. In the CAISO's discussion on San Francisco extreme events, the CAISO is also adding language that they may consider other situations (outside of San Francisco) on a case-by-case basis. Overall, SCE would appreciate more language regarding when an extreme event would initiate a review of potential mitigations. The suggestion goes to providing guidance to provide further clarification and to work with stakeholders on refining consideration of mitigations for extreme events. The aim of this comment is to encourage the CAISO to provide transparency and to work with stakeholders in consideration of mitigation of case-by-case extreme events outside of San Francisco and to determine the need of the mitigation. This will streamline the transmission planning process and support appropriate stakeholder submissions in the request window.

3. The CAISO has taken steps to consider preferred resources for transmission mitigation. During the CAISO's 2013/2014 Transmission Plan effort, the CAISO evaluated several preferred resource scenarios. As this effort evolves and the CAISO considers preferred resources to mitigate Category C and other conditions, SCE recommends the CAISO may need to update the Transmission Planning Standards. The Transmission Planning Standards were developed considering transmission mitigation as solutions; given the work in considering preferred resources as mitigation, the CAISO may need to update its Transmission Planning Standards for preferred resources. For example, defining the characteristics the CAISO would assume preferred resources to be utilized in transmission planning studies.