

Stakeholder Comments

Revised Transmission Planning Standards

Submitted by	Company	Date Submitted
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SCE appreciates the opportunity to provide the following comments on CAISO's "Revision to ISO Transmission Planning Standards."

In summary, SCE comments recommend refinements to the CAISO's proposal regarding the use of load shedding Special Protection Schemes (SPSs) for Category C contingencies. The focus of SCE's comments is to provide clarification. Please see, in the Appendix to these comments, SCE's redline edits (shown in red text, with CAISO's language in blue) to the revised draft Transmission Planning Standards. To summarize, SCE proposes:

1. To clarify what a local area is by adding its definition, as provided in the CAISO's proposal, to Section 6;
2. To add Section 6.2 System Wide Long-Term Planning for further clarification;
3. And to clarify that Section VI pertains to local areas only.

At this time, SCE does not have any comments on the proposals regarding extreme event mitigation for the San Francisco Peninsula area and the incorporation of revised NERC Transmission Planning Standards.

Please do not hesitate to contact us should you have questions or concerns.

Appendix
SCE Redline Edits to
Draft California ISO Planning Standards



Attachment 1 – Redline of Proposed Changes

California ISO Planning Standards

Draft

May 28, 2014

(Starting from page 7, Attachment 1: California ISO Planning Standards)

6.1 ~~Planning for High Density Urban Load Area Standard~~ Local Area Long-Term Planning

A local area is characterized by relatively small geographical size, with limited transmission import capability and most often with scarce resources that usually can be procured at somewhat higher prices than system resources.¹ The local areas are planned to meet the minimum performance established in mandatory standards or other historically established requirements, but tend to have little additional flexibility beyond the planned-for requirements taking into account both local generation and transmission capacity. Increased reliance on load shedding to meet these needs would run counter to historical and current practices, resulting in general deterioration of service levels.

For local area long-term planning, the ISO does not allow non-consequential load dropping in high density urban load areas in lieu of expanding transmission or local resource capability to mitigate NERC TPL-001-4 standard P1-P7 contingencies and impacts on the 115 kV or higher voltage systems.

- In the near term during short-term planning, SPS which drops load, including high density urban load, may be used to bridge the gap between real-time operations and the time when system reinforcements are built.
- In considering if load shedding 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, outage history for resources in the area, retirement impacts, and outage data for the local area due to unrelated events.

6.2 System Wide Long-Term Planning

System planning is characterized by much broader geographical size, with greater transmission import capability and most often with plentiful resources that usually can be procured at somewhat lower prices than local area resources. Due to this fact more resources are available and are easier to find, procure and dispatch. Provided it is allowed under NERC reliability standards, the ISO will allow non-consequential load dropping system-wide SPS schemes that include some non-consequential load dropping to mitigate NERC TPL-001-4 standard P1-P7 contingencies and impacts on the 115 kV or higher voltage systems.

VI. Background behind Planning for High Density Urban Load Area Standard for Local Areas

A local area is characterized by relatively small geographical size, with limited transmission import capability and most often with scarce resources that usually can be

¹ A “local area” for purposes of this Planning Standard is not the same as a Local Capacity Area as defined in the CAISO Tariff.

procured at somewhat higher prices than system resources. These areas are planned to meet the minimum performance established in mandatory standards or other historically established requirements, but tend to have little additional flexibility beyond the planned-for requirements taking into account both local resource and transmission capacity. The need for system reinforcement in a number of local areas is expected to climb due to projected resource retirements, with single and double contingency conditions playing a material role in driving the need for reinforcement. Relying on load shedding on a broad basis to meet these emerging needs would run counter to historical and current practices, resulting in general deterioration of service levels. One of the fundamental ISO Tariff requirements is to maintain service reliability at pre-ISO levels, and it drives the need to codify the circumstances in which load shedding is not an acceptable long-term solution:

1. For local area long-term planning, the ISO does not allow non-consequential load dropping in high density urban load areas in lieu of expanding transmission or local resource capability to mitigate NERC TPL-001-4 standard P1-P7 contingencies and impacts on the 115 kV or higher voltage systems.

This standard is intended to continue avoiding the need to drop load in high density urban load areas due to, among other reasons, high impacts to the community from hospitals and elevators to traffic lights and potential crime.

2. In the near term during short-term planning, SPS which drops load, including high density urban load, may be used to bridge the gap between real-time operations and the time when system reinforcements are built.

This standard is intended to insure that a reliable transition exists between the time when problems could arise until long-term transmission upgrades are placed in service.

3. In considering if load shedding 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, 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.