

Sent: Friday, May 27, 2011 4:01 PM

To: RegionalTransmission

Subject: Additional SDG&E Comments on CAISO Planning Standards

SDG&E has the following additional comments on the proposed CAISO Planning Standards, Draft Revision 6:

- 1) With regards to ISO SPS6 – We recommend that the CAISO consider eliminating the limitation based on the number of contingencies and replace it with a limitation on the number of elements being monitored for overload and number of facilities receiving a signal to take action (opening lines, inserting series caps, tripping generation, etc.) The intention here is to limit the complexity of an allowable SPS to reduce the likelihood of a unanticipated operation by limiting the SPS controller to a finite, relatively small number of inputs and outputs. A suggested standard could be:
 - a. No more than four inputs (monitored elements)
 - b. No more than four outputs (actions)
 - c. No more than six total inputs and outputs
- 2) Please clarify how the revised standards will apply to the 2011/2012 planning cycle. We propose that the revised standards take effect during the next cycle (2012/2013), but can be flexible on a case by case basis.

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