

## **SDG&E Comments on CAISO's Draft Transmission Planning Standards**

### **Non-Consequential Load Shedding for Category C Contingencies**

Generally, SDG&E approves of the approach taken by the CAISO in the development of the April 4, 2014 draft Transmission Planning Standards. SDG&E agrees that relying on large amounts of load shedding in densely populated urban areas to address credible Category C contingencies on the bulk power system is not an appropriate planning strategy. The correct long-term approach in SDG&E's view is to mitigate Category C contingencies on the BES either through system reinforcements, or by procurement of appropriate generation resources, or by prudent application of demand response and energy efficiency programs.

### **Extreme Event Mitigation for the San Francisco Peninsula**

SDG&E notes that TPL-004 requires the TP and PA to understand the risks and consequences of an extreme event and although it does not require an extreme event to be mitigated, it does imply that extreme events are not to be ignored. As such, SDG&E agrees that it is appropriate to mitigate extreme events under certain circumstances to protect the population from a prolonged outage.

With respect to the San Francisco Peninsula, SDG&E does not have a position on this portion of the CAISO standards, except to point out that this is a situation not unlike that of SDG&E's South Orange County load pocket – a large population that is somewhat geographically isolated and reliant on a single source to supply power.

### **Changes to NERC Transmission Planning Standards**

SDG&E recommends that the CAISO make it clear in the revised standards that load shedding to address N-1 or G-1/N-1 contingencies (Category P0 through P4) is not acceptable. The revised TPL-001-4 standard Footnote 12 appears to allow load shedding of up to 75 MW for N-1 and G-1/N-1 contingencies. As noted above, SDG&E believes that long-term reliance on load shedding to meet reliability standards is not appropriate.