

**COMMENTS ON BEHALF OF THE CITIES OF ANAHEIM, AZUSA, BANNING,
COLTON, PASADENA, AND RIVERSIDE, CALIFORNIA
ON THE STRAW PROPOSAL FOR REVISIONS TO
ISO TRANSMISSION PLANNING STANDARDS**

In response to the ISO's request, the Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (collectively, the "Six Cities") submit their comments on the straw proposal for revisions to the ISO's Transmission Planning Standards.

The straw proposal highlights the unique nature of the configuration and supply patterns for the San Francisco Peninsula and proposes that this area merits special consideration in the planning standards:

The ISO is therefore proposing to add to the Planning Standards specific recognition of the unique characteristics of supply to the San Francisco Peninsula and acknowledgment that planning for extreme events – including the approval of transmission solutions to improve the reliability of supply – is an appropriate action for the ISO Board to consider and approve.

(Straw Proposal at 9.)

As articulated in the straw proposal, the recognition for the San Francisco Peninsula that the ISO seeks to include as a broad policy principle in the planning standards does not seem especially well-defined. The Six Cities do not object to the study of Category D Extreme Events and their impacts on the ISO grid pursuant to applicable Reliability Standards. While there may be valid reasons to take certain actions to mitigate the impacts of Category D Extreme Events in this area and/or other areas that constitute urban population centers and/or share comparable, if not identical, vulnerabilities to the San Francisco Peninsula, the ISO should exercise caution in considering whether to establish a categorical policy that may be construed to elevate the approval of transmission solutions to mitigate Category D Extreme Events for any one area, especially without setting any parameters or objectives for mitigation. There could be merit in

considering whether such actions would be restricted to San Francisco or would apply to other areas.

Submitted by,

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