

**ISO reply to stakeholder
written comments submitted after the
May 20 stakeholder conference call regarding
the
ISO Planning Standards**

Comments to the ISO Planning Standards

San Francisco Greater Bay Area generation outage standard:

No comments received.

Combined line and generator outage standard:

No comments received.

Specific nuclear unit standards:

No comments received.

Loss of combined cycle power plant module as a single generator outage standard:

No comments received.

Voltage standard:

No comments received.

Planning for new transmission versus involuntary load interruption standard:

No comments received.

New Special Protection System (SPS) guideline:

Eliminate SPS limitation based on number of contingencies and replace with a limitation on the number of elements being monitored and number of facilities receiving signal to take action.

ISO response: ISO is concerned that allowing a virtually unlimited number of contingencies to trigger a certain SPS will likely result in high exposure for firm load interruption or resource curtailment.

Glossary:

Keep NERC and WECC definition of Bulk Electric System.

ISO response: The ISO is removing its definition of Bulk Electric System, however a new standard was added to the ISO Planning Standards to assure applicability of NERC Transmission Planning (TPL) standards, the NUC-001 Nuclear Plant Interface Requirements (NPIRs) for Diablo Canyon Power Plant and San Onofre Nuclear Generating Station, and the approved WECC Regional Criteria to facilities with voltages levels less than 100 kV or otherwise not covered under the NERC Bulk Electric System definition that have been turned over to the ISO operational control.

Change “time allowed for manual readjustment” from existing 30 minutes to facility ratings, except for simulations that result in wide spread or cascading outages in order to avoid additional or more complex SPS.

ISO response: The use of 30 minutes as time allowed for manual readjustment was always included in the ISO Planning Standards, as such all the current system and transmission plan reflect this assumption. ISO believes that maintaining this definition should not result in additional or more complex use of SPS throughout the system which could adversely impact system reliability.

Other stakeholder comments:

Please clarify in what planning cycle the revised standards will apply.

ISO response: Once the ISO Planning Standards are approved by the Board, the ISO intends to use them in the 2011/2012 planning process.