

The ISO received comments on the revisions to the ISO Transmission Planning Standards, July 28, 2014 Stakeholder Meeting from the following:

- 1. Bay Area Municipal Transmission group (BAMx)
- 2. California Public Utilities Commissions
- 3. City and County of San Francisco
- 4. Pacific Gas & Electric
- 5. Southern California Edison

Copies of the comments submitted are located on the *Transmission planning standards* page at:

http://www.caiso.com/informed/Pages/StakeholderProcesses/TransmissionPlanningStandards.aspx under the Policy development heading.

The following are the ISO's responses to the comments.



No	Comment Submitted	ISO Response
1	Bay Area Municipal Transmission group (BAMx)	
-	Submitted by: Barry Flynn and Robert Jenkins	
1a	There were very few questions raised during the stakeholder meeting concerning the CAISO proposal. This	
	lack of extensive comments reflects on the improved clarity of the CAISO proposal, but should not be	
	construed as support for all elements of the proposed revisions. BAMx continues to be highly concerned about	
	transmission costs. While reliability is very important, the proposal continues to lack safeguards to protect	
	consumers from excessive	
	transmission costs developed supposedly for reliability but that may not actually lead to commensurate	
	on whether continuity of concern is that making requirements part of a Flamming Standard Silences the debate	
	should be maintained BAMy believes that the CAISO response to stakeholder requests for such safeguards is	
	of little relief	
	"If small amounts of load shedding would mitigate the problem, then small amounts of demand response.	
	distributed generation, or storage would also mitigate the problem cost effectively." (Stakeholder comment	
	matrix)	
	While BAMx is highly supportive of such alternatives to new transmission additions, there is currently no	The ISO does have processes in place
	specific process to effect such solutions as part of the annual planning process. This response also side-steps	to consider preferred resources as
	the primary question of whether it is cost-effective to maintain service during a particular event in the first	solution alternatives in the annual
	place.	planning process. In addition the ISO
	In response to statished as a summaria, the CAICO stated.	processes are carefully coordinated with
	In response to stakenolder comments, the CAISO stated.	the CPUC procurement processes. One
	Sheuding high density dibar load rather than building incremental transmission of resource additions is certainly not a reasonable option and it is not reasonable or feasible to perform a detailed analysis to	is demand response which is basically
	accurately quantify the risks and cost exposure. Instead, the ISO practice is to deterministically acknowledge	voluntary load shedding If load
	that the impacts of shedding the high density urban load over the long term are obviously unacceptable and	shedding is a lower cost than a
	efforts should be focused on evaluating the numerous mitigation options available that maintain the	transmission solution, then, effectively.
	reliability of the system." (Stakeholder comment matrix – emphasis added)	considering demand response as an
		alternative will generally consider cost
	However, no quantitative analysis has been presented as a foundation for this position. At an earlier	effectiveness of load shedding.
	stakeholder meeting, the SCE representative indicated that SCE has previously done such analysis and has	
	an estimated value of service for its urban loads. We continue to be disappointed in the CAISO's apparent	
	I indifference to cost considerations in its rejection of all suggestions to take the costs and benefits of dropping	



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	or not dropping load into account, even in a simplified manner, in its proposal. Furthermore, the concept of "dense urban areas" needs refinement. There are, no doubt, many distribution circuits within residential communities in these identified "dense urban areas" where there are no "critical loads" (at least no more critical than those loads found outside of these high density areas). In such cases, that Planning Standard should make allowances for interruption of such loads.	
1b	<ul> <li>Lastly, BAMx continues to be concerned about the lack of a coherent policy as to where capital expenditures are justified to improve reliability to customers. Take, for example, a 30 MW station in a high-density urban area served from the 115 kV system.</li> <li>1. For more common distribution system outages, loss of the load is acceptable.</li> <li>2. If the station is served via a tapped connection (allowed under the CAISO Planning Standards for stations of up to 100 MW), loss of the load is acceptable for the single contingency loss of the connected 115 kV circuit.</li> <li>3. If the station is served by looping the same 115 kV circuit rather than tapping, loss of the load is unacceptable for the 115 kV single contingency</li> <li>4. For the much more unlikely transmission system multiple contingency, loss of the station is unacceptable, unless the contingency fully interrupts all of the power sources to the station, then it is acceptable.</li> <li>5. For the case similar to item 4 above, if the contingencies interrupt most, but not all sources into the area, loss of the load is unacceptable.</li> <li>6. If shedding the load would allow for increased transfers over the interties, then shedding of the load is acceptable.</li> <li>The result is that the same high density urban load, for which the CAISO describes load shedding as "certainly not a reasonable option", is subject to hodgepodge rules where it can at times be acceptable and other times be unacceptable to have a service interruption under single and multiple contingencies. In this mixture of requirements and allowances, there is not an explicit linkage to frequency, duration or impact of the potential outages to align why such interruption is acceptable in some cases but not others.</li> </ul>	In the BAMx example where a hypothetical 30 MW station is looped by a 115 kV transmission circuit, loss of both circuits serving the station would result in the consequential loss of the load and would not be prohibited. A scenario with a category C contingency that would not result in the consequential loss of load would involve much more than 30 MW in all but a tiny subset of contingencies in a large urban area. For practically all scenarios, a preferred resource option or a cost effective transmission solution would be available. Performing countless detailed studies with inadequate tools to address a concern that is not a practical one is what this standard avoids.
	The CAISO Planning Standards do allow for exceptions. In cases where dropping load is acceptable, the CAISO Planning Standards provide that upgrades "may be justified by liminating or reducing load outage exposure, through a benefit to cost ratio (BCR) above 1.0 and/or where there are other extenuating circumstances." However, this only applies to cases where the reliability of service provided for in the standard may be insufficient. BAMx supports the development of a more consistent and coherent policy that applies such concepts to proposals to increase the reliability of service above the NERC standards.	



No	Comment Submitted	ISO Response
2	California Public Utilities Commission	
	Submitted by: Keith White	
2a	Nonconsequential Load Dropping for Category C Contingencies May be Generally Undesirable in "Dense Urban Areas", but Should be Allowed on a Case-Specific Basis Where Appropriate.	Please see responses to BAMx.
	t is not in ratepayers' best interest to have the CAISO's hands tied in a manner that forces uneconomic infrastructure investments or an overly narrow consideration of options.	
	The CAISO currently proposes that its Transmission Planning Standards would categorically disallow nonconsequential (controlled) load dropping to address any Category C (multiple outage) contingency in a "dense urban area" defined as a U.S. Census Bureau-designated urbanized area having a population of one million or greater. These areas encompass diverse electrical, physical, and socioeconomic circumstances, and CAISO should not be unnecessarily bound to a rigid planning standard that does not allow consideration of unique circumstances.	
	The majority of Californians reside in "dense urban areas" as being defined. (Based on CPUC staff review of 2010 census information, 64 percent of California's population resided in such areas.) The CAISO points out that conditions in such areas often make nonconsequential load dropping for Category C contingencies undesirable, such as due to the potential for disrupting critical services heavily relied upon by many facets of an urban society. However, for <i>some</i> electrical contingencies in <i>some</i> "dense urban" areas, nonconsequential load dropping may be an appropriate mitigation – especially where the MW of load dropping is limited and does not significantly harm critical services, restoration is likely to be fast, and the probability of the precipitating multiple transmission outage is low.	
	Therefore, nonconsequential load dropping for Category C contingencies should be considered to be available in "dense urban areas" on a case-	



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	specific basis. Avoidance of nonconsequential load dropping could be the	
	default, but not the categorically required choice. A categorical requirement	
	could necessitate approval of high cost transmission upgrades to address	
	extremely low probability events having limited consequences.	
2b	The CPUC Staff Agrees San Francisco Peninsula May Warrant Further	
	Unique Consideration for Extreme Event Risk Mitigation, but Such Studies	The revision to the ISO Planning Standard reflects the unique
	Must Sufficiently Quantify Risks and Risk Mitigation Relative to Mitigation	characteristics of the San Francisco Peninsula area. While the NERC
	Costs (and Relative to Other Risks) and Must Take Into Consideration	Reliability Standards do not require the mitigation for Extreme Events.
	Environmental Feasibility of Mitigation Options.	the revision to the ISO Planning Standard identifies that mitigation may
	ODUO Olaffaansa ilaatilaa Osa Essasiara Daaisaada asaasaa	be considered based upon the unique characteristics of the Peninsula
	CPUC Staff agrees that the San Francisco Peninsula may warrant	area.
	consideration for mitigation of extreme event fisks, and appropriate studies	The determination of need to mitigate and accessment of notantial
	to infuminate both the fisks and the cost effectiveness of mitigation measures	mitigation alternatives is conducted as a part of the ISO's appual
	can be valuable. Such studies must be subjected to chilical	transmission planning process. Within the 2014-2015 transmission
		planning process the ISO is continuing the assessment of risk and
	electrical system impacts.	benefit of mitigation for extreme events in the Peninsula area
	Such studies should also make it objectively clear why the San Francisco	
	Peninsula uniquely requires consideration of extreme event mitigation. In this	
	regard the CAISO has pointed out "unique characteristics" of the San	
	Francisco Peninsula including high density urban loads, "geographic and	
	system configuration", certain risk drivers (especially earthquakes), and	
	"challenging restoration times." However, it is not objectively (and perhaps	
	not intuitively) obvious that (or why) special extreme event mitigation studies	
	are needed here but not anywhere else.	
	The CAISO should thus demonstrate semi-quantitatively and/or relatively	
	(relative to other risks) that the combination of physical event probability1	
	and event consequence2 translates into a total risk (expected societal	
	impact) that falls in a range that clearly warrants consideration of mitigation.	
	Such demonstration might be based in part on analogy or historical	
	precedent with other risks that we do (or do not) mitigate, such as more	
	conventional risks due to higher probability outages combined with load	
	growth, or due to other (perhaps less complex) extreme events.	



No	Comment Submitted	ISO Response
No	Comment Submitted           Additionally, before pursuing mitigation measures that are costly and potentially challenging for environmental permitting:           • The CAISO should open a consultation process with State of California emergency planning officials to work cooperatively on the extreme event planning. For example, certain extreme events may damage not only key electric infrastructure but also (1) the loads it would serve, and (2)	ISO Response
	<ul> <li>infrastructure associated with or needed by contemplated mitigation measures.</li> <li>The CAISO should provide information to the State of California on the mitigation alternatives under consideration so that those alternatives can be screened for environmental feasibility, roughly analogous to the recent screening of SONGS area transmission options prepared by ASPEN. The CAISO should then consider feedback on which alternatives to pursue</li> </ul>	
	<ul> <li>further, and which alternatives are highly likely to be completely infeasible for social or environmental reasons.</li> <li>The CAISO should consider whether a combination of non-transmission alternatives including long-duration storage and demand-side measures could help address reliability needs especially during a restoration period, reducing the need for major transmission solutions.</li> </ul>	
	• The CAISO should continue to review and pursue no/low regrets measures that can help mitigate extreme event impacts but that also provide substantial value under less extreme (higher likelihood) conditions.	



No	Comment Submitted	ISO Response
3	City and County of San Francisco	
	Submitted by: Michael Hyams and James Hendry	
3a	The City and County of San Francisco (CCSF), through its Public Utilities Commission (SFPUC) appreciates the opportunity to comment on the final draft revisions to the ISO's Transmission Planning Standards (Final Draft). CCSF strongly supports the ISO's proposed "Extreme Event Reliability Standard" for the San Francisco peninsula and that this proposal should be submitted to the ISO Board for its approval. This standard recognizes the unique electric reliability needs of the San Francisco peninsula due to such factors as a high density urban load, location on a peninsula, potential risk of outages including from earthquakes, and challenging restoration times. To these we would add San Francisco's extensive reliance on electrified transit (e.g. BART, MUNI light-rail, and the largest fleet of electric buses in the United States) as well as San Francisco's role as a major medical, financial, and high-technology center as additional reasons for an enhanced level of reliability.	Thank you for your support.
	As the Final Draft notes, the above criteria provide "a credible basis for considering for approval corrective action plans to mitigate the risk of outages that are beyond the reliability standards [applicable] to the rest of the ISO controlled grid." Nor is such a designation unusual. As the Final Draft notes, the ISO previously maintained separate, and stricter, reliability standards for San Francisco recognizing its transmission constraints. Similarly, the New York ISO has adopted separate and stricter reliability standards for New York City.	
	The Final Draft acknowledges that planning for extreme events does not automatically mean that mitigation measures will be adopted but only that they will be evaluated and considered by the ISO. This evaluation is currently being conducted in a separate on- going phase of the ISO Transmission Planning Process. In this phase CCSF urges the ISO to broadly consider all alternatives that improve San Francisco's reliability.	



No	Comment Submitted	ISO Response
4	Pacific Gas and Electric	
	Submitted by: Brad Wetstone and Dilip Mahendra	
4a	1. San Francisco Peninsula Extreme Event Reliability Standard	
44	1. San Francisco Peninsula Extreme Event Reliability Standard PG&E strongly supports the CAISO's proposed Extreme Event Reliability Standard as drafted in Section 7 of the CAISO Planning Standards. Codifying this new reliability standard is particularly important given the significant loss of load that could potentially result in the SF Peninsula area due to possible extreme events, such as major seismic events, third-party actions, and co-located facility failures. PG&E views the CAISO's adoption of the new standard as a critical step towards improving the resiliency of the Bulk Electric System (BES) for purposes of maintaining reliable electric service to customers in San Francisco and in San Mateo County following an extreme event. This new reliability standard explicitly acknowledges the limitation that exists in the NERC planning standards with respect to the development of extreme event mitigation and requires the CAISO to assess the need for corrective action plans, including transmission solutions that address the risk of extreme events specifically in the SF Peninsula area. PG&E supports this approach. PG&E has reviewed the incremental changes that the CAISO made to its proposal relative to the Revised Draft Proposal, dated May 28, 2014, and is supportive of the revisions. In particular, PG&E supports the revised structure of the standard as the well as the inclusion of the new provision to Section 7 that allows other areas of the grid to be considered, on a case-by-case basis, for extreme event mitigation. As stated above, PG&E continues to strongly support the proposed SF Peninsula Extreme Event Reliability Standard, which is now set forth in new Section 7.1. PG&E believes Section 7.1 appropriately identifies the set of characteristics that are unique to the SF Peninsula and that justify the need for this new standard. Further, these characteristics are consistent with the detailed description of risk factors specific to	Thank you for your support.
	the SF Peninsula area that is included in Appendix D (San Francisco Peninsula Extreme Event Reliability Assessment) of the Final 2013-2014 Transmission Plan.	
	Importantly, the last paragraph of Section 7.1 includes a provision acknowledging that because of the unique characteristics of the SF Peninsula a "credible basis" exists for considering corrective action plans to mitigate extreme events. PG&E agrees with that statement and believes it is well supported based on the information presented in Appendix D.	



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	With respect to the study work that the CAISO has initiated to assess extreme event reliability issues in the SF Peninsula area, PG&E appreciates and supports this analytic work. The study process began during the 2012-2013 transmission planning cycle and continued through the 2013-2014 planning cycle with the development of Appendix D to the 2013-2014 transmission plan. As the CAISO made clear during the June 4, 2014 stakeholder call and again during the July 28, 2014, stakeholder call, the CAISO is continuing the assessment of potential mitigation for extreme events as part of the 2014-2015 planning process and will engage stakeholders on the findings of its mitigation assessment during the CAISO to Complete the necessary analysis during the current planning to work with the CAISO to complete the necessary analysis during the current planning process.	
4b	<ul> <li>2. Non-Consequential Load Loss for TPL-001-04 P1-P7 Contingencies</li> <li>PG&amp;E is generally supportive of the revisions that the CAISO incorporated into its</li> <li>Final Draft Proposal to codify the acceptable uses of load shedding as mitigation for</li> <li>P1-P7 contingencies in local area and system-wide long-term planning. The new content that has been added to Section VI identifying the five High Density Urban Load Areas (HDULA) where non-consequential load dropping is not permitted as long-term mitigation as well as the inclusion of links to U.S. Census Bureau maps illustrating the geographic boundaries of each identified HDULA are improvements over the previous two policy proposals. While PG&amp;E is generally supportive of the revisions made to the Final Draft Proposal, PG&amp;E believes additional clarifications/refinements are needed prior to CAISO Management requesting approval by the Board of Governors. PG&amp;E requests clarifications of the following items:</li> <li>A. The interplay between the interpretation of Footnote 12 of TPL-001-04 on page 19 of the proposed standard and the provisions of Section 6.1 on page 7 concerning the acceptable uses of load shedding is not clear.</li> <li>In Section 6.1 the CAISO states:</li> <li>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</li> </ul>	



No	Comment Submitted	ISO Response
	impacts on the 115 kV or higher voltage systems.	
	I In the near term during short-term planning, where allowed by NERC standards,	
	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, where allowed by NERC standards, is a via	
	not call upon high density urban load, case-by-case assessments need to be	The ISO standard is clear that load dropping in not allowed as
	considered.	long-term mitigation for category P1, P2-1 and P3 anywhere on
	The above excerpt can be interpreted to mean that load shedding, where allowed by	the system based on the Footnote 12 interpretation.
	NERC standards, may be permitted by CAISO as long-term mitigation in non-	
	HDULAS. Meanwhile, the wording of the CAISO's interpretation of Footnote 12 of IPL-	For all other contingency categories ISO Standard 6 may apply
	001-04 in Section VII, Interpretations of Terms from the NERC Reliability Standards	depending on the density of the area and the impacts to the
	and WECC Regional Criteria, implies that load dropping as long-term mitigation for P1,	transmission system.
	P2-1, and P3 contingencies is not acceptable under any circumstances, regardless of	The continuous and cituations were notifier Features 10
	Civen that Section 6.1 encours to ellow lead drapping as accordable mitigation in the	interpretation per ISO Standard 6 applice: these are still subject to
	long term in pen HDI II As. DC8E believes the interplay between Section 6.1 and the	the rest of the ISO planning standards as well as WECC and
	CAISO's Ecotopte 12 interpretation needs to be clarified with respect to permitted load	NEPC standards
	shedding Likewise the interpletation needs to be clarined with respect to permitted toad	
	Planning) and the Footnote 12 interpretation also requires clarification	ISO believes that the ISO standards are clear and no further
		clarification is needed
	Additionally. PG&E seeks clarification as to whether the CAISO's Footnote 12	
	interpretation regarding permitted load shedding for P1, P2-1 and P3 contingencies is	ISO believes the Footnote 12 interpretation to be a clarification
	more stringent or restrictive than the actual Footnote 12 from Table 1 of TPL-001-04.	and not necessarily more stringent then NERC standard, since
	PG&E notes that Footnote 12 from Table 1 states that "In limited circumstances, Non-	the same Footnote 12 states: "An objective of the planning
	Consequential Load Loss may be needed throughout the planning horizon to ensure	process is to minimize the likelihood and magnitude of Non-
	that BES performance requirements are met." Given that NERC permits some load	Consequential Load Loss following planning events."; therefore
	dropping "throughout the planning horizon" for P1, P2-1, and P3 contingencies and	one needs to plan in the long-term for 0 contingencies and 0 MW
	recognizing that the CAISO's Footnote 12 interpretation speaks to limited load	load shedding (among P1, P2-1 and P3) to satisfy the
	shedding only on an interim basis, there appears to be conflict between the NERC and	minimization function effort stated by the footnote itself.
	CAISO provisions.	
4c	B. Clarification is needed regarding permitted/non-permitted load dropping at	
	voltages less than 115 kV.	
	The excerpt above from Section 6.1 provides that load dropping in HDULAs is not	Any situation not explicitly covered by ISO planning standards



No	Comment Submitted	ISO Response
	allowed in local area long-term planning to mitigate impacts on the 115 kV or higher voltage systems. Similar language regarding impacts on the 115 kV and above transmission system is found in Section 6.2 for system-wide planning where load draming is allowed analytication with NERC TRL 001 04. As currently drafted the	section 6 is subject to all other parts of the ISO planning standards as well as WECC and NERC standards as applicable.
	standard does not explicitly address whether load shedding to mitigate impacts on the	
	HDULAs, non-HDULAs, or at the system-wide level. PG&E believes the requirements	
	of the NERC standard would apply where the proposed standard does not explicitly address the issue.	
4d	C. Sections 6.1 and 6.2 refer to Special Protection Schemes (SPS) that drop load. Is it the CAISO's intent to only allow non-consequential load dropping if it is through an SPS?	No. Operating procedures, as interim load drop measures, may also be used if short term ratings are available in the area of study. Changes have been made to section 6.1 to reflect this.
4e	D. Section 6.2, which allows for "some" non-consequential load dropping system-wide as mitigation for P1-P7 contingencies, is captioned "System Wide Long-Term Planning." Is it the CAISO's intent to limit the application of this particular provision of the CAISO Planning Standards to long-term system planning? What is the CAISO's policy for load dropping at the system-wide level as short-term mitigation?	It is ISO intention that section 6.2 will apply to both Long-Term and Short-Term planning horizons. Changes have been made to section 6.2 to reflect this.
4f	<ul> <li>E. The Footnote 12 interpretation on Page 19 of the standard includes a typo that should be corrected. The word "single" should be deleted in the first sentence given that P3 is a multiple contingency criterion.</li> <li>Footnote 12 of TPL-001-4 Interpretation and Applicable Timeline: The shedding of Non-Consequential load following the single contingencies of P1, P2-1 and P3 on the Bulk Electric System of the ISO Controlled Grid is not considered appropriate in meeting the performance requirements.</li> </ul>	Typo will be corrected and word "single" will be removed.
4g	F. The planning standards should include capitalized terms found in the NERC glossary of terms in instances where the CAISO is intending to use NERC defined terms. For example, Section 6.1 includes the phrases "near term" and "long-term." Such phrases should be capitalized if the CAISO is referring to NERC defined terms. Where it is not intended, PG&E suggests that alternative language be used to avoid confusion with NERC defined terms.	The intent is to be consistent with NERC definition of terms; therefore your suggestion was included in the final document without capitalization since it is not an ISO Tariff or ISO grid planning standards defined term.



No	Comment Submitted	ISO Response
5	Southern California Edison	
	Submitted by: Garry Chinn, Ying He and Karen Shea	
5a	<ul> <li>Submitted by: Garry Chinn, Ying He and Karen Shea</li> <li>1. On page 33 of 34 of the Final Draft, the CAISO provides language discussing case-by-case assessments for extreme events. In item #3, the CAISO provides a list of risk assessment criteria it will consider for making its determination. SCE recommends the CAISO include the total amount of customers affected by the load shed prior to recommending mitigation project alternatives, thus considering the number of customers impacted due to the outage. Accordingly, please see the proposed redline addition below:</li> <li>3. In considering if load shedding, where allowed by NERC standards, 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, number of customers impacted by the outage, outage history for resources in the area, retirement impacts, and outage data for the local area due to unrelated events.</li> <li>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.</li> </ul>	Thank you for the suggestion which has been included in the final revision of the standard.
	p. 33 of 34, CAISO Final Draft	
	Also, before the CAISO determines the need for an upgrade, SCE recommend the CAISO consider the role of real-time mitigation of load reduction, and operational measures such as available area generation resources and imports	
	on other lines.	
5b	2. In the CAISO's discussion on San Francisco extreme events, the CAISO is also adding language that they may consider other situations (outside of San	The ISO conducts assessments of extreme events per the NERC



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	Francisco) on a case-by-case basis. Overall, SCE would appreciate more language regarding when an extreme event would initiate a review of potential mitigations. The suggestion goes to providing guidance to provide further clarification and to work with stakeholders on refining consideration of mitigations for extreme events. The aim of this comment is to encourage the CAISO to provide transparency and to work with stakeholders in consideration of mitigation of case-by-case extreme events outside of San Francisco and to determine the need of the mitigation. This will streamline the transmission planning process and support appropriate stakeholder submissions in the request window.	requirements. As a result of these assessments, the San Francisco area was identified as being unique and as such warranting consideration for mitigation. If in the annual assessments of extreme events in the planning process, the ISO determines other warrant mitigation the ISO will identify for stakeholders through the transmission planning process.
5c	3. The CAISO has taken steps to consider preferred resources for transmission mitigation. During the CAISO's 2013/2014 Transmission Plan effort, the CAISO evaluated several preferred resource scenarios. As this effort evolves and the CAISO considers preferred resources to mitigate Category C and other conditions, SCE recommends the CAISO may need to update the Transmission Planning Standards. The Transmission Planning Standards were developed considering transmission mitigation as solutions; given the work in considering preferred resources as mitigation, the CAISO may need to update its Transmission Planning Standards for preferred resources. For example, defining the characteristics the CAISO would assume preferred resources to be utilized in transmission planning studies.	The ISO transmission planning standards do not include reference as to what solutions can be implemented to eliminate the prospected violations. Preferred resources are one type of mitigation available. The characteristics of such preferred resources may be different from location to location depending on most stringent outage conditions, load shape of the area and availability of other resources, therefore it may take time to gain experience with preferred resources before we can develop a standardized approach.