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**Joint Comments of the Save the Foothills Coalition (STFC) and UCAN on the California ISO Planning Standards" dated February 7, 2002**

STFC and UCAN appreciate the opportunity to submit comments to the CAISO. The CAISO is proposing to revise the existing "California ISO Planning Standards" dated February 7, 2002. The planning standards that the CAISO is now proposing are set forth in the April 25, 2011 draft of the "California ISO Planning Standards" document. What is missing, however, is a clear explanation for why certain revisions are being proposed.

For example, ISO has stated that, "The ISO tariff provides for the establishment of planning guidelines and standards above those established by NERC and WECC to ensure the secure and reliable operation of the ISO controlled grid." (page 3) The ISO needs to explain what problems have been experienced under the current standards and provide compelling evidence to support its statement that higher standards are needed. ISO has also stated that "The primary guiding principle of these Planning Standards is to develop consistent reliability standards for the ISO grid that will maintain or improve transmission system reliability to a level appropriate for the California system." The CAISO needs to state why the current standards, to the extent they are being changed, are "inappropriate" for California.

Even where some explanation has been provided, the explanation relies on general, speculative, and vague terms such as "may" or "can" or "possible." There is nothing in the way of actual events or data. For example, under the section III.1 of the ISO Planning Guidelines and New Special Protection Systems (SPS) section, the ISO states that "with the increased transmission system utilization that comes with application of a SPS, there can be increased exposure to not meeting system performance criteria if the SPS fails or inadvertently operates." (page 6) No evidence has been provided that system utilization or flow on transmission lines have increased under current standards compared to some benchmark year or no information on the number of times SPS have operated. In particular, there is no indication of how many times SPSs have failed to operate or have misoperated.

The CAISO should provide an explanation as to why the "Combined cycle module as G-1" section is being added, why the section on "Voltage Standards" is being added, why the specific revisions to the "New transmission vs. involuntary load interruption" section are being made, and why there is a need for the revisions to the "New Special Protection Systems" section.