## Comments on the Transmission Planning Standards Revised Draft Straw Proposal dated May 28, 2014 and discussed in Stakeholder meeting on June 4, 2014 from Smart Wire Grid, Inc. June 18, 2014

## References:

- Revision to ISO Transmission Planning Standards Straw Proposal, dated May 28, 2014 (<u>http://www.caiso.com/Documents/RevisedDraftStrawProposal-</u> <u>RevisionTransmissionPlanningStandards.pdf</u>
- ISO's responses to stakeholder comments received after April 11, 2014 stakeholder meeting
  <u>http://www.caiso.com/Documents/StakeholderCommentsMatrix-</u>
  <u>TransmissionPlanningStandards-DraftStrawProposal.pdf</u>

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## Comments:

Smart Wire Grid (SWG) appreciates the efforts of the CAISO to update the CAISO Planning Standards. We have the following comments:

- While SWG does not oppose to avoiding Non-Consequential Load shedding for high density urbanized local areas after a Category C contingency; however, the ISO's proposed changes to the planning standard needs clarification to avoid confusion in future applications. We suggest that the ISO provide some examples on how these Section II.6 would apply beyond the transmission plan in the current TPP for both the "high density urban loads" and for the "non-high density urban loads". Such examples would go a long way in furthering the understanding of the impacts of the proposed changes. Specifically,
  - a. As written, the proposed changes in Attachment 1, Section II.6, would eliminate any benefitcost assessment for high density urbanized loads. Therefore, the ISO could cause, say, a disproportionally large capital expenditure to avoid dropping a small amount of load within a high density urbanized area. An explanation on how this probability could be avoided will be helpful.
  - b. In the response to SWG comments concerning LCR (on page 25 of the ISO's response to Stakeholder comments), the ISO stated that, "The ISO planning standards would not prevent the installation of SPS pursuant to the LCR methodology to avoid excessive contractual costs." This can produce confusion in the future. In a few years, it would be difficult to distinguish between an SPS installed to shed Non-Consequential Load to lower LCR, which is allowed, from the same SPS to shed the same Non-Consequential Load due to a NERC Category C Contingency, which is not allowed in this proposal.

- c. In the second bullet, same Section, the ISO states that "In considering if load shedding 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." Even though the sentences that follow outline some considerations for the Assessment, a more detailed discussion of the process to ensure consistency in such evaluations across the CAISO Balancing Area will be helpful.
- 2. In Attachment 1, Section VII, the reference to NERC Footnote 12, and Footnote 6 should be removed. This section should contain only the timelines for implementation of the NERC TPL-001-4.

The CAISO's Footnote 6 states,

"TPL-001-4 has an 84 month effective date for some of the requirements. With this, after Jan 1, 2021 the Corrective Action Plans may no longer include curtailment of firm transmission service or non-consequential load loss in excess of 75 MW or non-consequential load loss that does not meet the conditions specified in Attachment 1 of TPL-001-4 for the following categories of contingencies: P1-2 and P1-3 (for controlled interruption of electric supply to local networks customers connected to or supplied by the faulted element), P2 -1, P2-2 and P2-3 (above 300 kV), P3-1 through P3-5, P4-1 through P4-5 (above 300 kV) as well as P5 (above 300 kV)."

a. The part that states, the "Corrective Action Plans may no longer include curtailment of firm transmission service" is in direct conflict with NERC Footnote 9, which states,

"TPL-001-4 Footnote 9 states: "Curtailment of Firm Transmission Service is allowed both as a System adjustment (as identified in the column entitled 'Initial Condition') and a corrective action when achieved through the appropriate re-dispatch of resources obligated to re-dispatch, where it can be demonstrated that Facilities, internal and external to the Transmission Planner's planning region, remain within applicable Facility Ratings and the re-dispatch does not result in any Non-Consequential Load Loss."

NERC Footnote 9 clearly allows curtailment of Firm Transmission Service if it can be achieved through "re-dispatching of resources obligated to re-dispatch" and such redispatch will not cause any transmission problems or result in Non-Consequential Load Loss. Examples, of resources obligated to re-dispatch can include resources that participate in reserve sharing, the resource under the ISO operational control, or available through contract for emergency support. Categorically disallowing curtailment of Firm Transmission Service is not justified.

b. The remainder of the CAISO's Footnote 6 is a restatement of the requirements in NERC Table 1, not an interpretation because it has the same content as NERC Table 1.

To avoid confusion, please remove the paragraph on NERC Footnote 12 and the associated ISO Footnote 6.

Thank you for the opportunity to comment.