Stakeholder Comments to
Updates to the Local Capacity Technical Study Criteria
Draft Final Proposal (dated September 3, 2019)

Submitted by	Company	Date Submitted
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SCE appreciates the opportunity to provide comments to the Draft Final Proposal on the LCTS Criteria Update.

SCE is in general agreement with the proposed revisions except for the Extreme event - loss of two or more elements. The existing Local Capacity Criteria calls for evaluating risk and consequence per NERC Standards and that no voltage collapse or dynamic instability is allowed for N-1 followed by (common mode) L-2. This criteria has long been adopted for the LCR technical studies and should be retained. SCE has concerns with the proposed revision to modify the requirement to: "For voltage collapse or dynamic instability situations, mitigation is required "if there is risk of cascading" beyond a relatively small predetermined area directly affected by the outage."

This modification creates a less precise threshold for when mitigation is required for situations resulting in voltage collapse or dynamic instability. Notably, thresholds where "risk of cascading" and "beyond a relatively small predetermined area" are undefined. This introduces less clarity for planners and regulatory decision makers to use as a basis for determining local area needs and executing mitigations.

If the intent of this modification is to provide flexibility for lower voltage areas which may not significantly impact the overall system even if there is identified voltage collapse or dynamic instability issues in the small area, the language can be more specific: "For voltages less than 200 kV, where voltage collapse or dynamic instability is identified, mitigation is required if there is risk of cascading beyond the relatively small predetermined area directly affected by the outage." For voltages greater than 200 kV the original criteria language would remain applicable.