



February 15, 2018

California Independent System Operator  
Christopher Devon, Senior Infrastructure & Regulatory Policy Developer  
*Via Email Submission to InitiativeComments@caiso.com*

**RE: Comments on CAISO Transmission Access Charges Initiative Straw Proposal**

Dear Mr. Devon and CAISO Staff:

Borrego Solar Systems, Inc. (Borrego) appreciates the opportunity to submit comments on the California Independent System Operator's (CAISO) Transmission Access Charge (TAC) Initiative Straw Proposal. Borrego specializes in developing, engineering, procuring, and constructing commercial-scale solar and energy storage projects. Since 1980, Borrego has deployed nearly 450 MW of solar generation, over 100 MW of which are sited in California.

Borrego urges CAISO to fix the TAC market distortion that inappropriately affixes transmission system charges to electricity that was not delivered via the transmission system. This market distortion prevents load-serving entities (LSEs) from capturing the full value of local renewable energy and makes wholesale distributed generation (WDG) projects look artificially more expensive than they are. If WDG projects sited in communities across the state can serve local load on the distribution system without ever crossing transmission lines, the electricity they produce should not be subject to TAC.

We instead support Clean Coalition's proposal to move the point of assessment for TAC from the customer meter to the transmission-distribution interface. This fix would ensure that energy that does use the transmission system properly pays for that access, but that energy that is generated and consumed locally is not unreasonably charged. The current TAC structure is particularly unreasonable at a time when distributed energy resources are deferring costly, unnecessary investments in grid infrastructure, which wind up on all ratepayer bills.

California's ambitious climate goals require us to keep developing renewable energy. The California Public Utilities Commission's recent Integrated Resource Planning modelling found that 9 GW of new solar will be needed by 2030 to meet our greenhouse gas reduction goals. Properly reforming TAC is important to ensuring that California can meet this need flexibly and locally at the least ratepayer expense. We request that CAISO consider moving the point of measurement for the TAC from the customer meter to the transmission-distribution interface.

Thank you for your consideration.

Respectfully submitted,

/s/ Rachel Bird

Rachel Bird

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