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September 15, 2017

Via Email

Craig Lewis
Clean Coalition
16 Palm Court
Menlo Park, CA 94025


Re: Questions from CMUA On Clean Coalition Presentation of August 29, 2017

Dear Mr. Lewis:

Tony Braun asked me to take on the task of gathering questions about the Clean Coalition's August 29, 2017 Presentation in the CAISO Reviewing the Transmission Access Charge stakeholder process. We realize that CAISO just this afternoon posted materials from Clean Coalition about its proposal, and that the question date has been extended to Monday. We decided to go ahead and send these questions, while reserving the right to ask additional questions after we have had a chance to examine the new material. This letter forwards the questions accumulated thus far to you. Feel free to send answers as available, and please let us know if you have any questions about what is being asked. Written responses can be sent to me at the address above, with a copy to Tony Braun, counsel to CMUA, at Braun Blaising Smith Wynne, PC at 915 L Street, Suite 1480, Sacramento, California, 95814.

Thank you for your attention to this matter and obviously any responses that you can provide in time for consideration in drafting the comments due October 13, 2017 would be helpful.

Sincerely,



Lisa G. Dowden

cc: Tony Braun

Questions for Clean Coalition from CMUA

1. Please reference slides 3, 14, and 42 of the Clean Coalition's August 29, 2017 presentation. Is Clean Coalition aware that some distribution system facilities may interconnect directly to the high voltage transmission system rather than to low voltage facilities?
2. Please explain your statement on slide 6 of Clean Coalition's presentation that the existing "Customer Energy Downflow" TAC methodology costs ratepayers money. Please provide analysis demonstrating that using TED instead of CED will reduce the total transmission costs charged to ratepayers. In doing so, please explain if the total costs of existing transmission O&M will be reduced or increased by DG.
3. Please provide any studies that support the conclusion on slide 12 that more DG will result in less transmission investment and lower system costs.
4. Please provide any study or analysis that Clean Coalition believes supports the graph on slides 13 and 24 of the Clean Coalition's August 29, 2017 presentation. Has Clean Coalition performed similar analyses involving any other PTOs?
5. With reference to Slide 14 of the Clean Coalition's August 29, 2017 presentation, please state the basis for Clean Coalition's understanding that metering TED at the High Voltage interface would yield a different number than the sum of metering TED for all customers behind that interface at their customer meters, as the PTOs now do. For the purposes of answering this question, please assume that there is no backfeed and that losses are zero.
6. If Clean Coalition's understanding referenced in question 5 was derived from discussions with employees of any PTO, the CAISO, the CPUC, the CEC or with any other persons, please identify the person(s) and their respective employers, and provide any documents they provided to Clean Coalition on this topic, and any notes or analysis of these discussions.
7. Does Clean Coalition believe that the CAISO PTOs "gross up" customer meter readings to account for distributed energy generation behind the customer meter when they prepare their sales forecasts as part of the calculation of Gross Load that will be used to develop the CAISO TAC rate?
8. If the answer to question 7 is yes, please state the basis of that understanding and provide any documents or analyses related to that contention. If the basis for Clean Coalition's understanding is derived from conversations with employees of any PTO, CAISO, the CPUC, CEC or with any other person, please identify such person(s) and their respective employers, and provide any documents those persons provided to Clean Coalition explaining, discussing or analyzing the PTO calculations of Gross Load.
9. On slide 16, how does Clean Coalition define "high voltage transmission usage"? On the same slide, please explain which cost allocation principles you believe support use of TED.

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10. On slide 17, how would the UDC know each LSE's DG output? Would the LSE LV and DG output be known when TAC rates are calculated? Would DG resources be required to produce a stated amount of energy each billing period?
11. With regard to the different TAC mechanisms for PTOs and non-PTOs on slide 18, does Clean Coalition understand the reasons for the differences?
12. With respect to slide 18 of the Clean Coalition's August 29, 2017 presentation, has Clean Coalition performed an assessment of relative rates of DG deployment as between PTOs and non-PTOs? If so, please provide the assessment and any supporting documents. Do the results of this study or assessment support Clean Coalition's hypothesis that use of a TED-type methodology (as is currently applicable for non-PTOs) will incent faster and more DG deployment?
13. With respect to slide 19 of the Clean Coalition's August 29, 2017 presentation, please provide a copy of Alameda Municipal Power's "plan to credit their customers with DG resources for avoided transmission charges." Is Clean Coalition aware of whether non-DG participating customers of Alameda Municipal Power will pay increased transmission charges as a result of this plan? Please explain why or why not.
14. On slide 21, what does Clean Coalition mean by "avoid the transmission grid"?
15. Please provide the calculations supporting the chart on slide 23.
16. Please explain what Clean Coalition means by the statement that "DER reduce the stress on the transmission grid" (see slide 25 of the Clean Coalition's August 29, 2017 presentation) and provide any documentation or analyses upon which Clean Coalition relies for this statement.
17. How does DG reduce existing transmission costs, as stated on slide 25?
18. With reference to the claims made in Slide 25 of the Clean Coalition's August 29, 2017 presentation, please identify specific transmission projects that Clean Coalition contends were cancelled or deferred, in whole or in part, due to the deployment of local solar, energy efficiency or other distributed energy resources.
19. Please provide the underlying data, and any supporting calculations/assumptions, used to prepare the chart on Slide 28 of the Clean Coalition's August 29, 2017 presentation.
20. Does the statement on slide 29 "Wholesale distributed generation and aggregated DG are RPS-eligible resources" presume that all DG are RPS eligible? If so, please explain the basis for that premise.
21. Please provide any data, assumptions, calculations or analyses supporting the claim that distributed energy resources, local solar and energy efficiency free up transmission

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capacity, reduce congestion, or reduce line losses (see Slide 30 of the August 29, 2017 presentation).

22. With regard to the study referenced on slide 31, what portion of the existing and planned DG resources in service territories served by the CAISO grid contain the “grid-friendly” controls that were included in the 300 MW PV resource studied by NREL? Please provide all sources and studies to support your response.
23. Please provide any study or analysis Clean Coalition has prepared explaining the impact it contends that adoption of TED will have in lowering future CAISO TAC. Please also provide the underlying data, and any supporting calculations/assumptions, for the chart on Slide 32 of the Clean Coalition’s August 29, 2017 presentation.
24. With respect to slides 40 and 41 of the Clean Coalition’s August 29, 2017 presentation, please address the following questions:
 - a) Is the Clean Coalition proposing that the CAISO would submit an annual FERC filing proposing the TAC rate?
 - b) If the Clean Coalition proposes that the CAISO would undertake an annual TAC filing, does the Clean Coalition proposal include a limitation on the ability of PTOs to file changes in their Transmission Revenue Requirements at times other than when the CAISO files the annual HV TAC rate? How would intra-year changes in the HV Transmission Revenue Requirement be handled?
 - c) Would the “HV TED” component of the proposed HV TAC rate be a forecast of future usage, be based on the prior year’s usage, or derived using some other approach? If a forecast, who would be responsible for developing the forecast?
25. Please explain the term “HV-LV firewall” as used on slide 42 of the Clean Coalition’s August 29, 2017 presentation.
26. Please provide the underlying data, and any supporting calculations/assumptions, for the table on Slide 44 of the Clean Coalition’s August 29, 2017 presentation.
27. With respect to slide 45 of the Clean Coalition’s August 29, 2017 presentation, does the “PG&E Electric Delivery” charge include both transmission charges and distribution charges? If yes, please provide the breakdown of the PG&E Electric Delivery charges between the transmission and distribution components.
28. Does Clean Coalition have a proposal for how LSEs should allocate their TAC liability among retail customers (some that use DG and others that don’t)? Would there be different methods of allocation for customers who are wholesale or retail, or customers of CCAs or those who have direct access arrangements with alternative suppliers?
29. Please state and explain whether it is Clean Coalition’s belief that parties are choosing not to install DG resources as a result of the current methodology for assessing TAC. Please provide any documents, studies, or analyses that support Clean Coalition’s position.

Questions for Clean Coalition from CMUA

30. Please provide more information about how Clean Coalition proposes the Low Voltage TED rates would be implemented and how PTOs with low voltage transmission facilities will recover their low voltage TRRs.
31. Has Clean Coalition performed any assessment of whether existing metering infrastructure is adequate to implement the TED methodology? If so, please provide documentation of the assessment, including (but not limited to) any estimate of costs for any additional metering facilities that would be necessary to implement the TED methodology.
32. Does Clean Coalition propose that the CAISO should collect a transmission charge if output from a resource connected at the distribution level within LSE X, located in Southern California, is sold to a customer located in LSE Y, located in Northern California? If so, who would pay the transmission charge for such a sale and how and where would it be measured? What if the resource connected at the distribution level within LSE X is sold to a customer located outside of the CAISO – either inside or outside of the EIM footprint?