



## **Comments of the Public Advocates Office at the California Public Utilities Commission on the California Independent System Operator’s Subscriber Participating Transmission Owner Model Status Update**

**December 19, 2022**

The Public Advocate’s Office at the California Public Utilities Commission (Cal Advocates) supports the Subscriber Participating Transmission Owner Model as an effective means of providing additional transmission capacity without increasing the Transmission Access Charge (TAC). The subscriber model is one of California’s best tools to mitigate rapidly increasing transmission costs. If developed and integrated thoughtfully, subscriber-based lines can leverage private investment to benefit California ratepayers.

The California Independent System Operator’s (CAISO) November 28, 2022 status update states that the Power Company of Wyoming (PCW) will pay for the network upgrades – either on the existing ISO system or outside of it - that are required to connect the TransWest Express line and its associated wind generation to the rest of the ISO grid.<sup>1</sup> Given that this model is meant to be used by a variety of subscriber-based projects, Cal Advocates recommends that the CAISO clarify that this aspect – that ratepayers do not fund network upgrades that connect the subscriber-based line - will be a part of the Subscriber Participating Transmission Owner Model. Overall, Cal Advocates supports the development of a Subscriber Participating Transmission Owner Model that can include as wide a range of subscriber-based projects as possible.

Cal Advocates supports the expeditious adoption of this model and subscriber-based transmission more broadly.

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<sup>1</sup> Subscriber Participating TO Model Status Update. CAISO. November 28, 2022. P. 8. Available at <http://www.caiso.com/Documents/Subscriber-participating-transmission-owner-status-update-Dec-5-2022.pdf>.