



Stakeholder Comments Template

Transmission Access Charge Structure Enhancements: Draft Final Proposal

This template has been created for submission of stakeholder comments on the Transmission Access Charge Structure Enhancements: Draft Final Proposal that was published on September 17, 2019. The Transmission Access Charge Structure Enhancements, Stakeholder Meeting presentation, and other information related to this initiative may be found on the initiative webpage at:

<http://www.caiso.com/informed/Pages/StakeholderProcesses/TransmissionAccessChargeStructureEnhancements.aspx>

| Submitted by | Organization | Date Submitted |
|--|------------------------------------|----------------------------------|
| <i>(submitter name and phone number)</i> Louis Torres | <i>(organization name)</i> CPUC | <i>(date)</i> October 9, 2018 |

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on **October 9, 2019**.

Please provide your organization’s comments on the following issues and questions.

Hybrid Billing Determinant Proposal

Please state your organization’s position on the Hybrid Billing Determinant Proposal as described in the Transmission Access Charge Structure Enhancements: Draft Final Proposal: (Support, support with caveats or oppose)

If you replied supports with caveats or opposes, please further explain your position and include examples:

The CPUC appreciates the opportunity to comment on this final draft straw proposal for the TAC Structure Enhancements Initiative.

CPUC Staff agrees with the phase-in approach of the hybrid proposal. However, Staff has concerns with the straw proposal statement:

“Using prior period historic peak-demand data (from October 1 through September 30), rather than forecasted data, to derive both the TRR split between the demand and volumetric rate components and the 12CP demand rates”

CPUC Staff believes that using only one year of historic data could introduce unwanted volatility and instead recommends a rolling 3-year period as a basis of the split and the 12 Coincident Peak (12-CP) calculation. The resultant calculation would mitigate rate volatility.

Additional comments

Please offer any other feedback your organization would like to provide on the Transmission Access Charge Structure Enhancements: Draft Final Proposal.

We have no further feedback on this initiative at this time.