



## Stakeholder Comments Template

### Review TAC Structure Revised Straw Proposal

This template has been created for submission of stakeholder comments on the Review Transmission Access Charge (TAC) Structure Revised Straw Proposal that was published on April 4, 2018. The Straw Proposal, 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/ReviewTransmissionAccessChargeStructure.aspx>.

Submitted by	Organization	Date Submitted
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Upon completion of this template, please submit it to [initiativecomments@caiso.com](mailto:initiativecomments@caiso.com).

Submissions are requested by close of business on **April 25, 2018**.

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

#### Hybrid billing determinant proposal

1. Does your organization support the hybrid billing determinant proposal as described in the Revised Straw Proposal?

*Yes. NCPA supports the hybrid billing concept.*

2. Please provide any additional general feedback on the proposed modification to the TAC structure to utilize a two-part hybrid billing determinant approach.

*No additional comments at this time.*

#### Determining components of HV-TRR to be collected under hybrid billing determinants

3. Does your organization support the proposal for splitting the HV-TRR for collection under the proposed hybrid billing determinant using the system-load factor calculation described in the Revised Straw Proposal?

*Yes. NCPA agrees with CAISO that attempting to assign the costs of specific transmission costs on a retroactive basis was not likely to be a fruitful exercise. The proposed system-load factor calculation is a reasonable proxy.*

4. Please provide any additional specific feedback on the proposed approach for splitting the HV-TRR costs for the proposed hybrid billing determinant.

No additional comments at this time.

#### **Peak demand charge measurement design for proposed hybrid billing determinant**

5. Does your organization support the proposed 12CP demand charge measurement as described in the Revised Straw Proposal?

NCPA can support the 12 CP demand charge measurement set forth in the straw proposal, as it aligns with CAISO's transmission planning analysis. NCPA could also support a 4 CP measurement as an alternative.

6. Please provide any additional feedback on the proposed design of the peak demand charge aspect of the hybrid billing determinant.

No additional comments at this time.

#### **Treatment of Non-PTO entities to align with proposed hybrid billing determinant**

7. Does your organization support the proposed modification to the WAC rate structure to align treatment of non-PTO entities with the proposed TAC hybrid billing determinant?

NCPA can support the CAISO WAC rate structure design for Non-PTOs as proposed.

8. Please provide any additional feedback related to the proposal for modification to the treatment of the WAC rate structure for non-PTO entities.

No additional comments at this time.

#### **Additional comments**

9. Please offer any other feedback your organization would like to provide on the Review TAC Structure Revised Straw Proposal.

NCPA has no additional comments at this time.