



Transmission Access Charge Structure Enhancements: Draft Final Proposal

Submitted by	Organization	Date Submitted
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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)

PG&E supports CAISO's proposal of using the hybrid billing determinant as outlined in the Draft Final Proposal. PG&E agrees with CAISO's assessment that a hybrid approach—utilizing both peak demand and volumetric measurements of customer use—more closely aligns with cost causation principles, because the transmission system provides both energy and capacity benefits. PG&E appreciates CAISO's response to stakeholders' requests on the financial impact of different elements of this hybrid billing determinant proposal.

PG&E believes there are still issues that require further discussion. For instance, the treatment of LV-TAC rates or how traditional exports have a different Wheeling Access Charge (WAC) rate structure that is wholly volumetric have not been adequately reviewed as part of this initiative. However, PG&E still supports this initiative as it is an incremental improvement towards a rate structure that more closely follows cost causation.

Additional comments

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

PG&E has no additional comments at this moment.