

Stakeholder Comments Template

Submitted by	Company	Date Submitted
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“Review Transmission Access Charge Structure”

Submit comments to InitiativeComments@CAISO.com

Comments are due October 13, 2017 by 5:00pm

We support the Clean Coalition’s proposal to improve the transmission access charges (TAC). CAISO should change where usage is measured for TAC, regardless of how charges for that usage is ultimately calculated.

The Clean Coalition’s proposal to measure transmission usage at the end of the transmission grid by using transmission energy downflow (TED) would lead to a more level playing field for local renewables, reduce future transmission costs, slow growth in TAC rates, and cause massive ratepayer savings. TED is the only reasonable metering point for measuring transmission grid usage. The transmission grid boundary provides a consistent, unbiased, and technology-neutral point of measurement, and usage should be measured there. This change is critical to ensuring that distributed energy resources (DER), including but not limited to community solar gardens of 3 MW or less on distribution level voltage connections such as 12 kV and 21 kV, face a level playing field against transmission-dependent resources. Failure to correct this issue will perpetuate a market distortion that favors remote resources over distributed resources, and we urge you to correct it by adopting the Clean Coalition’s proposal.

Failure to correct the TAC measuring point will lead to continued over-investment in transmission system where local resources are more cost-effective. DER reduce the stress on the transmission grid and avoid the need for future transmission grid investment, but the current TAC methodology obscures those benefits. The Clean Coalition proposal would reduce the market distortion on DER and create a market signal for resources that deliver services without using the transmission grid. This would result in avoided

transmission investment and billions of dollars of ratepayer savings. For these reasons, we urge you to adopt the Clean Coalition's proposal.