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**“Review Transmission Access Charge Structure”**

Solar Electric Solutions 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, and lead to significant ratepayer savings. TED is the appropriate metering point for measuring transmission grid usage. The transmission grid boundary provides a consistent, unbiased, and technology-neutral point of measurement. This change is very important to ensuring that distributed energy resources (DER) face a level playing field against transmission-dependent resources. Failure to correct this issue will perpetuate a market distortion that unfairly 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 would ensure an appropriate price 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.