



June 30, 2106

TO: California ISO

RE: Transmission Access Charge Wholesale Billing Determinant Issue Paper

The [Berkeley Climate Action Coalition](#), whose membership includes over 675 residents, community organizations, and educational and religious institutions working to help the City of Berkeley reach its Climate Action goals, writes in reference to the 6/26/16 Transmission Access Charge Wholesale Billing Determinant Issue Paper. BCAC supports the Clean Coalition's proposal to charge TAC to internal load measured at the transmission-distribution interface substation.

As a grassroots environmental justice organization, BCAC does not have the technical expertise to respond to the questions set forth in the Issue Paper other than the first one: "What policy objectives should any change to the TAC wholesale billing determinant achieve?"

For the past four years, BCAC has advocated for the creation of a Community Choice energy program for Alameda County that would prioritize the development of distributed solar resources within the county. It's our view that distributed solar can be developed more expeditiously and with far greater economic benefits to the community than remote, centralized, utility-scale solar. Moreover, the development of distributed solar resources located close to the end user minimizes electricity transmission loss, an increasingly important consideration in an energy-constrained future. BCAC believes that aggressive implementation of distributed solar is a critically important strategy for achieving the goals set forth in Berkeley's Climate Action Plan.

Alameda's Community Choice program (East Bay Community Energy) will likely launch next year with a commitment to prioritizing the development of local, decentralized solar. In addition, the City of Berkeley is moving forward with its own plan to meet 50% of residents' and businesses' electricity demand with solar and will be implementing various policies to accelerate solar deployment within city limits.

The Clean Coalition's proposal will bring the cost of distributed solar down to near parity with utility-scale solar, thereby facilitating the ability of East Bay Community Energy and the City of Berkeley to develop local distributed solar resources.

Thank you for your consideration of our comments.

On behalf of the Berkeley Climate Action Coalition,

A handwritten signature in black ink that reads "Rebecca G. Milliken".

Rebecca Milliken
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