



## 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
<i>Steven Kelly Policy Director</i>	<i>Independent Energy Producers Association (IEP)</i>	<i>April 25, 2018</i>

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? *At this point, IEP does not oppose the concept of a hybrid billing determinant as presented by the CAISO. On the other hand, we question the necessity and value of changing the current based on the data presented to date. For IEP, the key question remains: will changing to a hybrid billing determinant result in demonstrably better cost allocation among LSEs while avoiding inappropriate cost-shifting?*
2. Please provide any additional general feedback on the proposed modification to the TAC structure to utilize a two-part hybrid billing determinant approach.

#### 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? IEP has no comment at this time regarding the system-load factor calculation for determining the hybrid billing determinant.

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

#### **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? IEP has no comment at this time regarding the 12CP demand charge measurement.
6. Please provide any additional feedback on the proposed design of the peak demand charge aspect of the hybrid billing determinant.

#### **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? IEP has no comment at this time regarding the WAC rate structure.
8. Please provide any additional feedback related to the proposal for modification to the treatment of the WAC rate structure for non-PTO entities.

#### **Additional comments**

9. Please offer any other feedback your organization would like to provide on the Review TAC Structure Revised Straw Proposal. IEP concurs with the CAISO's determination to maintain the current point of measurement at the end-use customer meters. Moreover, IEP believes it is time to move forward. Over the past 18 months or so, stakeholders devoted significant time and resources considering the proposal to change the point of measurement. During this review, a number of critical concerns have been raised, including concerns about inappropriate cost-shifting. As the independent system operator, the role of the CAISO is to remove unjust and unreasonable barriers to participation in CAISO markets. On the other hand, it is not the role of the CAISO to incent Load-serving Entities (LSEs) through the design the TAC charge to procure more resources than the LSEs would otherwise procure.