

February 14, 2018  
Christopher Devin CAISO TAC initiative manager  
California Independent System Operator  
250 Outcropping Way  
Folsom, CA 95630



## Re: OPPOSITION TO CAISO TAC INITIATIVE STRAW PROPOSAL

Dear Christopher Devin,  
SanDiego350, and our 10,000 supporters in the San Diego region, strongly opposes the CAISO TAC initiative straw proposal. The proposal attempts to justify an unjust system charging local generators for transmission infrastructure they will never use. Local clean energy needs a level playing field. Instead, the current TAC forces local clean energy to subsidize far off generation, which is rapidly becoming an antiquated and suboptimal system.

These are our top 3 concerns regarding CAISO TAC initiative straw proposal:

1. Forces local clean energy generators to subsidize distant central generation by subsidizing transmission infrastructure.
2. Causes congestion on transmission from central generation power plants. If the transmission lines were not burdened with central generation they could more easily convey power between distribution systems without need for additional transmission infrastructure. That would save ratepayers money on transmission and stimulate local economies.
3. Incentivizes distant generation which continues to waste energy in unnecessary line losses when compared to point-of-use solar.

**As the Clean Coalition has proposed, the point of measurement for transmission access charges should be moved to the transmission-distribution interface.** This change would allow the assessment of transmission access charges to be based on energy delivered through the transmission system.

The growing impacts of climate change require the state to transition to a local renewable energy model. We can not afford the status quo: inefficient use of our transmission infrastructure by the outdated central generation electricity model.

Sincerely,

Tyson Siegele  
Public Policy Team  
SanDiego350

Cc:  
Matthew Renner, Clean Coalition  
Email to: [initiativecomments@caiso.com](mailto:initiativecomments@caiso.com)

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SanDiego350 is an inclusive volunteer organization devoted to inspiring a movement to prevent the worst impacts of climate change and climate injustice. We strive to create a future that supports a livable planet and just society through education and outreach, public policy advocacy, and mobilizing people to take action.