

Stakeholder Comments Template

Review TAC Structure Second Revised Straw Proposal

This template has been created for submission of stakeholder comments on the Review Transmission Access Charge (TAC) Structure Second Revised Straw Proposal that was published on June 22, 2018. The Second Revised 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>

Upon completion of this template, please submit it to initiativecomments@caiso.com.

Submitted by	Organization	Date Submitted
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Submissions are requested by close of business on **July 18, 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?

2. Please provide any feedback on the proposal to utilize PTO-specific FERC rate case forecasts to implement the hybrid billing determinant proposal.

For context, under the second revised straw proposal, the ISO modified the proposal to use PTO specific rate case forecasts to set the HV-TRR bifurcation and resulting HV-TAC volumetric and demand rates. Does your organization support this modification to the proposal?

- a. Please provide any feedback on the possibility that this proposal causes a need for PTO's FERC transmission rate case forecasts to be modified to include coincident hourly peak load forecasts.

- b. Does your organization believe that the use of historic data from the prior annual period could be a viable alternative for this aspect of the proposal? Please explain your response; if you believe this would be more appropriate or potentially problematic please indicate support for your position.

3. Please provide any additional feedback on any other aspects of the hybrid billing determinant proposal.

Additional comments

4. Please offer any other feedback your organization would like to provide on the Review TAC Structure Second Revised Straw Proposal.

The Second Revised Straw Proposal, p. 44, misrepresents the position TANC took with respect to the appropriateness of using 12CP from the Revised Straw Proposal, claiming TANC supported the 12CP proposal. TANC, in fact, took no position, indicating that more analysis would be needed to make a proper determination. TANC's comment on 12CP from the Revised Straw Proposal is as follows:

TANC does not have a specific position with respect to the 12CP proposal, but would ask that the CAISO provide more analysis and support for it or any alternative it determines to follow in its final proposal. The transmission planning reliability studies do not rely on 12 monthly peaks, instead relying more on seasonal peak studies. The 2018-19 Transmission Study Plan includes summer, spring and winter periods; hence if the CAISO is planning the future grid requirements based upon seasonal requirements – would a 4CP be a more equitable measurement to utilize? TANC believes that the CAISO should provide additional analysis and thought to justify that the 12CP is in fact appropriate compared to a 4CP.