



## Stakeholder Comments Template

### Transmission Access Charge Structure Enhancements: Draft Final Proposal

This template has been created for submission of stakeholder comments on the Transmission Access Charge Structure Enhancements: Draft Final Proposal that was published on September 17, 2019. The Transmission Access Charge Structure Enhancements, 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/TransmissionAccessChargeStructureEnhancements.aspx>

Submitted by	Organization	Date Submitted
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Upon completion of this template, please submit it to [initiativecomments@caiso.com](mailto:initiativecomments@caiso.com). Submissions are requested by close of business on **October 9, 2019**.

**Please provide your organization's comments on the following issues and questions.**

#### Hybrid Billing Determinant Proposal

Please state your organization's position on the Hybrid Billing Determinant Proposal as described in the Transmission Access Charge Structure Enhancements: Draft Final Proposal:

*ITC Grid Development, LLC ("ITC") supports the Hybrid Billing Determinant Proposal as described in the Draft Final Proposal, which we believe appropriately reflects the multiple drivers and functions of transmission facilities.*

If you replied supports with caveats or opposes, please further explain your position and include examples:

#### Additional comments

Please offer any other feedback your organization would like to provide on the Transmission Access Charge Structure Enhancements: Draft Final Proposal.

ITC continues to support the proposal to maintain the current point of measurement at the end-use customer meter, in order to maintain appropriate pricing signals and allocate the cost of transmission facilities to those who use and benefit from them. We would note that transmission beneficiaries include customers who own distributed generation, but who remain connected to the grid for back-up when that generation is not available.