

Stakeholder Comments Template

Review Transmission Access Charge Wholesale Billing Determinant

June 2, 2016 Issue Paper

Submitted by	Company	Date Submitted
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The ISO provides this template for submission of stakeholder comments on the June 2, 2016 issue paper. The issue paper, presentations and other information related to this initiative may be found at:

<http://www.caiso.com/informed/Pages/StakeholderProcesses/ReviewTransmissionAccessChargeWholesaleBillingDeterminant.aspx>

Upon completion of this template please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on **June 30, 2016**.

Issue Paper

12. Please add any additional comments you'd like to offer on this initiative.

PacifiCorp has been actively participating in the TAC options stakeholder initiative as a potential participating transmission owner in an expanded regional ISO and offers the following general comments.

PacifiCorp appreciates discussion of the wholesale billing determinant in a TAC-related stakeholder initiative but believes that the evaluation of a specific proposal is premature—especially given the ongoing nature of the TAC options stakeholder process.

Regarding the Clean Coalition proposal specifically, PacifiCorp shares the concerns in the current initiative issue paper reiterated from the Energy Storage and Distributed Energy Resources Phase 2 process. In particular, the proposal does not consider the fact that existing transmission investment decisions have been largely determined by the need

to serve peak load and that load should continue to pay for the real benefits like reliability that come from being part of an interconnected grid. The proposal would result in undue cost shifts for transmission investments—especially those already undertaken.

Also, in an ISO market construct that currently includes non-CPUC jurisdictional entities and one that could evolve to include entities falling under other state jurisdictions, PacifiCorp believes that any such jurisdiction-specific incentives to achieve policy objectives should be crafted to avoid affecting consistent treatment of market elements like billing determinants.

PacifiCorp encourages the ISO to delay any consideration of specific proposals until a more appropriate time when a complete discussion of billing determinants can be had in the context of the TAC structure as a whole.