

**Comments of Powerex Corp. on
Transmission Access Charge Options Second Revised Straw Proposal**

Submitted by	Company	Date Submitted
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CAISO's September 30, 2016 Second Revised Straw Proposal on Transmission Access Charge Options for New Participating Transmission Owners addresses a number of substantive issues raised by stakeholders. Powerex takes no position with respect to the new proposals outlined.

However, in keeping with its earlier comments,¹ Powerex continues to be concerned that the existing application of access charges to exports deters transactions that could provide additional flexible capacity to CAISO and could generate significant economic and efficiency benefits. The CAISO's Second Revised Straw Proposal does not address this issue, but instead assumes that an export access charge ("EAC") will continue to be assessed on a per-MWh basis to all exports. Powerex respectfully requests that CAISO consider limiting the application of the EAC to exports consistent with Powerex's earlier comments and continue to look for opportunities to remove barriers to more efficient interregional trade.²

¹ See, e.g., Comments of Powerex Corp. on Transmission Access Charge Options Straw Proposal at 3-4 (Mar. 23, 2016), *available at* <http://www.caiso.com/Documents/PowerexComments-TACOptions-StrawProposal-BenefitsAssessmentMethodologies.pdf>; Comments of Powerex Corp. on Flexible Resource Adequacy Criteria and Must Offer Obligation – Phase 2 Straw Proposal at 18-21 (Jan. 6, 2015), *available at* <http://www.caiso.com/Documents/PowerexComments-FlexibleResourceAdequacyCriteria-MustOfferObligation-StrawProposal.pdf>.

² Powerex notes that other commenters also have expressed concern regarding the application of access charges to exports. See, e.g., San Diego Gas & Electric Co., Comments on August 11, 2016 Stakeholder Working Group Meeting at 8 (Aug. 25, 2016) (arguing in favor of an export fee of \$0/MWh), *available at* http://www.caiso.com/Documents/SDG-EComments-TransmissionAccessChargeOptionsWorkingGroup_Aug11_2016.pdf. See also Comments of the Western Power Trading Forum on FMM Intertie Liquidity Workshop at 1-2 (Nov. 2, 2015) (supporting removal of export fees on export schedules), *available at* <https://www.caiso.com/Documents/WPTFComments-ImportandExportLiquidityinthe15-MinuteMarketWorkshop-Oct62016.pdf>.