

## Stakeholder Comments Template

**Transmission Access Charge Options****December 6, 2016 Draft Regional Framework Proposal**

Submitted by	Company	Date Submitted
Shelly-Ann Maye Regulatory Manager (515) 281-2206	TransCanyon, LLC	January 11, 2017.

The ISO provides this template for submission of stakeholder comments on the December 6, 2016 draft regional framework proposal and the discussion at the December 13 stakeholder meeting. The proposal, presentations and other information related to this initiative may be found at:

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

Upon completion of this template please submit it to [initiativecomments@caiso.com](mailto:initiativecomments@caiso.com). Submissions are requested by close of business on **January 11, 2017**.

**NOTE:** Items highlighted in yellow below refer to elements of the present proposal that have not changed from the prior proposal, the second revised straw proposal posted on September 28. If your organization's position on one of these elements has not changed from the comments you submitted on the September 28 proposal, you may simply refer to your prior comments in response to that item and the CAISO will take your prior comments as reflecting your current position.

**Introduction**

*TransCanyon LLC (TransCanyon) appreciates the opportunity to participate in this initiative, and to provide input on the draft regional framework proposal. At this time, TransCanyon's comments will be limited to two specific areas: (1) the CAISO's proposal that all new transmission facilities 200 kV or greater be subject to competitive solicitation; and (2) whether changes to the transmission planning process need to be made to account for an expanded balancing authority area.*

## **Draft Regional Framework Proposal**

1. **Competitive solicitation to select the entity to build and own a new transmission project would apply to all new transmission projects rated 200 kV or greater, of any category, with exceptions only as stated in ISO tariff section 24.5.1 Please comment on this proposal.**

*TransCanyon strongly supports this proposal. Competition not only creates the impetus for developers to submit innovative solutions to identified needs, but it also imposes cost discipline on transmission developers which results in cost savings to ratepayers. (Please refer to TransCanyon's previous comments on the Second Revised Straw Proposal).*

2. **The CAISO assumes that a new integrated TPP for the expanded ISO will retain today's TPP structure. Please comment on the structure of the current three phase TPP process.**

*TransCanyon recognizes that the new integrated TPP for a regional market will retain the elements of the current TPP structure. However, to the extent that the CAISO is willing to revisit the issue of whether modifications to the TPP structure are needed to accommodate an expanded footprint, TransCanyon requests that the CAISO provide further information on how existing transmission projects currently under development, both within and outside the Inter-Regional Transmission planning process, may be incorporated into future TPPs so as to reduce cost to consumers and potentially reduce projects' time to market. Significant progress and investments have been made and are ongoing to support the development of transmission options for benefit of the current CAISO BAA and for a wider expanded BAA, all of which may be valuable to resource developers and to consumers of electricity. TransCanyon appreciates the CAISO's work on this important initiative and would also appreciate additional opportunities to discuss future TPP changes and developments.*