

Stakeholder Comments Template

Transmission Access Charge Options**September 30, 2016 Second Revised Straw Proposal**

Submitted by	Company	Date Submitted
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The ISO provides this template for submission of stakeholder comments on the September 30, 2016 second revised straw proposal. The second revised straw 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. Submissions are requested by close of business on **October 28, 2016**.

General Comments

TransCanyon appreciates the opportunity to provide comments on the second revised straw proposal. TransCanyon has been an active participant in the on-going process of revising the CAISO's transmission access charge to accommodate an expanded regional ISO footprint. TransCanyon's comments will be limited to one aspect of the latest revised straw proposal, namely supporting the CAISO's proposal to subject all new transmission projects 200 kV or greater to competitive solicitation regardless of project category.

Second Revised Straw 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, regardless of whether their costs are allocated to only one or more than one sub-region, with exceptions only for upgrades to existing facilities as stated in ISO tariff section 24.5.1. Please comment on this proposal.

TransCanyon is supportive of the CAISO's revised proposal that would subject all new transmission facilities 200 kV or greater to competitive solicitation regardless of project category, and regardless of whether the cost of the project would be allocated to one sub-region with one Participating Transmission Owner (PTO) or multiple sub-regions. This

latest proposal revises CAISO's earlier proposal that would exempt from competitive solicitation, new projects with costs allocated to a single sub-region with a single PTO. By expanding the scope of facilities that are subject to competition, the CAISO not only levels the playing field between sub-regions with multiple PTOs (such as California) and those with a single PTO (such as PacifiCorp, assuming it joins an expanded western ISO), but it brings the benefits of competition to a broader customer base. Competition not only spurs innovation by incentivizing competing developers to offer creative cost-effective solutions to identified needs, it also induces cost discipline which results in ratepayer savings. For these reasons, TransCanyon supports this element of the second revised straw proposal.