



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. 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: (Support, support with caveats or oppose)

Comment: The City of Vernon (Vernon) supports CAISO's hybrid billing determinant proposal.

Vernon appreciates the shift from the use of forecasted data to historical data to set the HV TRR bifurcation and resulting HV TAC volumetric and demand rates. Vernon believes that the use of historical data is better approach as such information is based on actual data.

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.

Comment: The City of Vernon would suggest that in the implementation of hybrid TAC, CAISO consider establishing a data review process so to allow the PTOs to review their PTO-specific monthly coincident peak demand data before their inclusion in the CAISO rate calculations. Such review process will have the benefit of correcting incorrect data and avoid unnecessary regulatory filings at FERC to correct rates.