



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)

NCPA appreciates the changes that CAISO made in this draft final proposal, and appreciates the opportunity to comment.

NCPA generally supports the hybrid billing determinant proposal, including the modifications to the WAC rate structure for non-PTO entities, so long as the current point of measurement for a non-PTO entity's load remains unchanged.

If you replied supports with caveats or opposes, please further explain your position and include examples:

Consistent with NCPA's comments submitted on 7/18/2018 in response to the Second Revised Straw Proposal in this stakeholder process, and NCPA's

comments submitted on 9/26/2018 in the Excess Behind the Meter Production stakeholder initiative, NCPA strongly believes that the current point of measurement remains appropriate and that the historical (and proposed) structure and exclusions of the Gross Load definition continue to provide an appropriate balance of benefits and burdens for Non-PTOs, consistent with the bargain and agreement made when the Non-PTOs became part of the CAISO.

Additional comments

Please offer any other feedback your organization would like to provide on the Transmission Access Charge Structure Enhancements: Draft Final Proposal.

NCPA has no further comments at this time.