



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)

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

[Silicon Valley Power \(SVP\) supports the CAISO's Proposal of the Hybrid billing determinant with a system-wide gross load factor calculation as outlined in the Draft Final Proposal.](#)

[SVP believes that the phase in approach could be warranted if the CAISO is looking to implement by the year 2020 – as opposed to the potential 2021 or 2022 timeframe mentioned in the CAISO's September 24th stakeholder meeting. If the CAISO is to phase in the proposed modifications of the TAC billing determinant, SVP suggests that the CAISO consider phasing it in using 25% of the HV-TRR to be collected under the 12CP peak demand HV-TAC rate and 75% of the HV-TRR will be collected under the volumetric HV-TAC rate in year one, and then in year two the ISO would begin calculating the HV-TRR bifurcation through the proposed](#)

system load factor approach.

If implementation begins after 2020, SVP recommends that the hybrid billing determinant be implemented with no phased in approach. High load factor utilities have been paying more than their fair share of transmission system costs for a substantial period of time, and this should be rectified sooner than later.

Additional comments

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

SVP supports the CAISO's direction to change the current TAC Structure from a solely Volumetric Rate to a Hybrid Demand and Volumetric rate as it better aligns with cost causation.

It is justified that the Non-PTO entities pay both the volumetric rate and demand rate charged under the hybrid approach, but also retain the current point of measurement used today for both billing determinants. SVP supports the CAISO's decision to maintain the end-use meter as the determinant for determining wholesale transmission costs.

SVP appreciates the CAISO's review of the TAC Structure and has no further comments at this time.