

1 **Q: Reference: Embedded and Marginal Cost of Service Review, May 3, 2019**  
2 **prepared by The Brattle Group, Inc., Page 18, Lines 9-12.**

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4 *“...the Federal Energy Regulatory Commission has consistently required that*  
5 *high voltage circuits that connect solely to a single generator, or group of*  
6 *generators in the case of wind farms, are deemed required to have an Open*  
7 *Access Transmission Tariff (OATT).”*

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9 **Is Brattle aware of any jurisdiction where a large portion of the costs of**  
10 **transmission lines is allocated based on energy, similar to the practice of the**  
11 **California ISO? If so, please provide details.**

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13 **A.** In the California ISO transmission customers pay for transmission services based  
14 on gross load, which is a measure of energy. This is a rate design issue. The  
15 planning of the transmission system, however, and the costs that result are based  
16 upon maximum level of demand. Please see also answer to NP-PUB-001.