

1 **Q: Reference: Embedded and Marginal Cost of Service Review, May 3, 2019, The**  
2 **Brattle Group, Page 17, Line 19 to Page 18 Line 4.**

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4 *“The main distinction is usually between those facilities that connect all the*  
5 *major power sources with each other – the backbone transmission facilities – and*  
6 *everything else. Utilities have identified subsystems such as generation step-up*  
7 *facilities, system interconnection and subtransmission, among others. These*  
8 *transmission system components and other non-backbone facilities may often be*  
9 *considered as a separate network of facilities that are either not used to support*  
10 *the backbone system, or represent facilities that require special recognition in the*  
11 *ratemaking process.”*

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13 **Is it Brattle’s opinion that it would not be reasonable to provide “special**  
14 **recognition in the ratemaking process” to a new transmission line built**  
15 **primarily to bring energy from an isolated large generating source to a distant**  
16 **large load, simply because it might technically be part of a larger**  
17 **interconnected system? Please explain.**

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19 **A.** In this particular case, we believe it would not be reasonable to provide special  
20 recognition in the ratemaking process that would classify portions of the LIL and  
21 the LTA as energy for the reasons stated in response to NP-PUB-001.