

1 **Q: Reference: Embedded and Marginal Cost of Service Review, May 3, 2019, The**
2 **Brattle Group, Page 18, Lines 5-7.**

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4 *“In general, generator leads are taken to be the portion of the electrical facilities*
5 *beginning at the point of interconnection to the generator and ending at, and*
6 *including the low voltage side of the step up transformer that connects to the*
7 *transmission system.”*

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9 **In Brattle’s experience, would FERC always disregard causality in favour of**
10 **a general approach as outlined in the reference? Please explain.**

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12 A. We cannot speak to what FERC would or would not do. We believe, however, that
13 it is general FERC policy to treat generator leads similar to the LIL and LTA as
14 part of the transmission system and subject to open access requests and
15 requirements. See also our response to LAB-PUB-001.