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TeMix Inc comments on the Draft February 14th, DRAFT Load Management Tariff Standard Markup

Additional submitted attachment is included below.



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MS-4 Docket No. 19-OIR-01
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TeMix Inc. comments on the Draft February 14th, DRAFT Load Management Tariff Standard Markup

TeMix presented the Retail Automated Transactive Energy System (RATES) pilot funded by the CEC EPIC in a presentation at the January 14th, 2020 workshop.¹

The Draft February 14th, Load Management Tariff Standard Markup requires the following in section (c) (2) Communications:

“Electricity providers shall publish all non-tiered, time-dependent rates using the January 2020 version of OpenADR 2.0b (IEC 62746-10-1 ED1), unless the CEC adopts by rule a later version.”

TeMix suggests that this requirement for the sole use of IEC 62746-10-1 ED1 for the 2020 Load Management Standard

- 1) does not provide sufficient specificity for communication of dynamic tariffs to customers, and
- 2) does not support transactive energy protocols necessary to fully benefit from the flexibility of battery and thermal storage, heat pumps, electric vehicles, pumps, and large refrigerated warehouses and the electrification of California for 100% clean energy. For example, forward 24-hours ahead hourly pricing for load shaping and shifting is needed as well as granular 15- or 5-minute pricing for fast price response.

The IEC 62746-10-1 ED1 standard is a very large document, more than 200 pages, and must be purchased from the IEC at a price of about \$400 per developer seat. It has many capabilities for event-based demand response that are unnecessary for

¹ <https://efiling.energy.ca.gov/GetDocument.aspx?tn=231538&DocumentContentId=63345>

dynamic tariff communication, and the standard is not specific as to how a dynamic tariff would be communicated, so different implementations are possible.

The OpenADR Alliance has proposed extensions to OpenADR 2.0 for transactive energy that would address point 2) above, but development of these extensions has not yet been funded². Such extensions could support RATES as well as price-only hourly and sub-hourly tariffs, for example.

Transactive Energy protocols along with OpenADR are the subject of the OASIS Energy Interoperation standards³ which highlight the common elements of OpenADR and Transactive Energy.

TeMix therefore recommends more flexibility in the Load Management Tariff Standard to allow for a range of dynamic tariffs and continuing innovation.

Submitted by

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² <https://www.openadr.org/assets/symposium/OpenADR%20Symposium%20template-Cazalet.pdf>

³ https://www.oasis-open.org/committees/tc_home.php?wg_abbrev=energyinterop