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Additional submitted attachment is included below.

**STATE OF CALIFORNIA
BEFORE THE CALIFORNIA ENERGY COMMISSION**

In the matter of:)	Docket No. 19-OIR-01
)	
Load Management Rulemaking)	SMUD Comments Re:
)	Load Management Rulemaking
)	
)	September 17, 2021
)	
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**Comments of SACRAMENTO MUNICIPAL UTILITIES DISTRICT on
Market Informed Demand Automation Server Workshop in the
Load Management Rulemaking**

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments to the California Energy Commission (CEC) on the *Market Informed Demand Automation Server (MIDAS) Workshop* held on August 27, 2021.

SMUD strongly supports the state's decarbonizing efforts to reduce greenhouse gas (GHG) emissions by promoting transportation and building electrification and increasing the development of renewable resources. SMUD began implementing Time-of-Use (TOU) rates for commercial and industrial customers in 1993. By 2012, all commercial customers were transitioned from tiered rates to TOU rates. Throughout 2012-2013, SMUD implemented a Smart Pricing Options Pilot Program which provided the basis for California's transition to TOU rates as the default for utility customers. SMUD began implementing Time-of-Day (TOD) rates for residential customers in 2018 and completed the transition in 2019. After the first full summer, 98% of our eligible customers had remained on the TOD rate, with only 2% opting out for a flat rate.

SMUD is committed to continue exploring advanced time-varying rates and incentive structures coupled with appropriate load flexibility and automation that could benefit our customers. Load management is a crucial element for meeting GHG reduction objectives, and we respectfully submit the following comments on the Draft Staff Instructions MIDAS Documentation for connecting to--and interacting with--the MIDAS database.

1. Data in MIDAS is not a billing signal. Additional clarity is needed to ensure customers do not react to the MIDAS data in a way that is inconsistent with its intended use.

SMUD is concerned that the data signals in the MIDAS may not create an accurate representation of customer bills, because the MIDAS only includes a portion of the full energy cost. For utilities with distribution services and retail services combined, like SMUD, the MIDAS may not reflect other components of marginal costs such as transmission and

distribution. This could have the undesirable consequence of customers misunderstanding or misusing the information in the MIDAS database and reacting to the data in a way that is inconsistent with load management objectives.

For example, the MIDAS specification does not make it clear that the Value Table can be populated with values for demand charges, fixed charges, or other non-electricity charges that would be necessary to consider the full bill impacts of customer choices or automation decisions. If a load response were automated only in consideration of the lowest energy cost, other charges could be triggered inadvertently and have the actual effect of increasing the customer's bill amount. Even if demand, fixed and other charges were captured in the database, automation providers may be unable to gauge whether their optimization would exceed peak demand levels set previously and trigger additional billed amounts.

SMUD recommends that the MIDAS specification be revised to clearly define whether non-electricity charges are included in the Value Table. If the MIDAS will not include non-electricity charges, then a footnote or disclaimer posted on the customer-facing application may help ensure customer expectations are consistent with the intent of the MIDAS and load management objectives.

2. Database Structure. Recommended revision to the data elements in the RateInfo Table and Value Table.

Rate Identification Number – the number of characters in the “RateCode” field (e.g., 4-character format) cannot readily be mapped to utility conventions. SMUD's commercial and residential rate codes exceed 4 characters. We recommend adding at least 7 characters to the RateCode (including dashes and underscores) to make the MIDAS more efficient for utility usage. Adding characters is preferable to truncating or translating existing rate codes to fit a 4-character requirement, because truncating would add extra steps for users trying to identify or compare prices in MIDAS with published tariffs.

3. Follow up Questions regarding the MIDAS Database structure and specifications.

- a. How will the data be used by the end user?
- b. Will MIDAS host only current prices being billed today or will future prices that have been approved also be included in the database? For example, SMUD usually has two years of price changes approved in a rate action. However, the prices are not entered into the system until just before the prices are ready to be applied to bills.
- c. The MIDAS Instructions reference that “rates are archived when they are no longer current.” Is there an expectation that SMUD provide historical rates and pricing in the data feed to MIDAS? Or will the MIDAS database store this history as of go-live and own the archive?
- d. What is the anticipated timeline for utilities to provide data feeds for MIDAS?

e. Our understanding is that an application programming interface (API) to call and pass the data through will be provided to utilities. Will utilities only be calling an API? Or is there a need or option for a batch file interface through file transfer protocol (FTP)?

f. Table 3: Value Table Data Fields. Several fields in this table are listed with a constraint of standard Coordinated Universal Time (UTC) for the date/time. However, other fields simply list "valid date." Should all the data field dates be UTC?

Conclusion

As always, SMUD appreciates the opportunity to provide these comments and looks forward to continuing to work with staff in this proceeding.

/s/

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cc: Corporate Files (LEG 2021-0116)