

DOCKETED

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OIR-21-03 Rules for public access to MIDAS

Don't limit innovation in your efforts to "future-proof" California.

Additional submitted attachment is included below.

OIR-21-03 Rules for public access to MIDAS

Dear Energy Commission Commissioners,

Have any changes been made to the rules for public accessibility to the MIDAS database at <https://midasapi.energy.ca.gov>?

Perhaps commission staff have overlooked GOV 11340.5(a) by not including the contents of <https://midasapi.energy.ca.gov> in the express terms of the proposed regulatory language?

Perhaps commission staff have overlooked GOV 11340(d) by prescriptively requiring the use of the MIDAS database in the proposed regulations.

The imposition of prescriptive standards upon private persons and entities through regulations where the establishment of performance standards could reasonably be expected to produce the same result has placed an unnecessary burden on California citizens and discouraged innovation, research, and development of improved means of achieving desirable social goals.

Perhaps commission staff have overlooked the claim that the proposed regulations are performance standards in the [STD. 399](#) form filed in [21-OIR-03](#)?

Please require commission staff to remove the prescriptive requirement of the use of the not yet fully functional MIDAS database.

Staff are proposing a change to the proposed regulations, appearing necessary due to the prescriptive nature of the express terms of the proposed regulations requiring the use of the MIDAS database in its current form.

Pursuant to changes to proposed language for 1623(b) in [TN242564](#);

"The Commission maintains public access to the MIDAS database through an Application Programming Interface (API) that, provided a Rate Identification Number (RIN), returns information sufficient to enable automated response to marginal grid signals including price, emergency events, and greenhouse gas emissions.";

is made uncertain by the complete removal of;

"Each customer shall be able to access all rate information applicable to the customer with a single RIN assigned by the utility." due to the prescriptive nature of the regulation requiring the use of the MIDAS database in its current form.

Only " with a single RIN assigned by the utility" should be removed

leaving "Each customer shall be able to access all rate information applicable to the customer.", if the prescriptive nature of regulations requiring the use of the MIDAS database in its current form remain.

A small innovation to the data structure of MIDAS would make "Each customer shall be able to access all rate information applicable to the customer with a single RIN assigned by the utility." possible. Although this alone would not change the prescriptive nature of the regulation requiring the use of the MIDAS database.

The database is publicly accessible at <https://midasapi.energy.ca.gov> in a standard machine-readable format through an application programming interface (API) that supports both extensible markup language (XML) and JavaScript Object Notation (JSON) responses to queries. For instructions on accessing the MIDAS database, see section 3.1 of [TN241066](#). Although the MIDAS system is publicly accessible and querying access is available to all users, LSE users must have advanced programming skills and in-house software to effectively populate and maintain rate information stored within the database.

Commission staff have prescriptively limited accessibility to the MIDAS database by not providing public access the the "Holiday" data table.

The rules for public accessibility to the MIDAS database are standards of general application that limit public accessibility to the MIDAS database.

Energy Commission Commissioners, please see that rules are codified that ensure the commission maintains public access to the MIDAS database through an Application Programming Interface (API) that, provided a Rate Identification Number (RIN), returns information sufficient to enable automated response to marginal grid signals including price, emergency events, and greenhouse gas emissions regardless of how the public achieve California's energy goals.

Please ensure a "Performance standard" which means a regulation that describes an objective with the criteria stated for achieving the objective to achieve California's energy goals replace the proposed "Prescriptive standard" which means a regulation that specifies the sole means of compliance with a performance standard by specific actions, measurements, or other quantifiable means, such as the required use MIDAS database.

Don't limit innovation in your efforts to "future-proof" California.

Thanks,

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