

DOCKETED

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Additional submitted attachment is included below.

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The below appears to imply that all meters will have a different RIN.

As found in [TN242579](#)

§ 1623(b) In response to comments that it is not accurate or desirable, staff is proposing to delete, "Each customer shall be able to access all rate information applicable to the customer with a single RIN assigned by the utility." This sentence is inaccurate because a customer should have more than one RIN if they have multiple meters or multiple sites.

Is my interpretation correct?

According to [TN241067 Final Staff Report](#), the MIDAS standard RIN is akin to entering a real estate parcel number or vehicle identification number to access information about a home or car. This would require each meter to have a different RIN.

Other than the use of "a single RIN" in 1623(b), which is a prescriptive standard unreported in the [STD. 399 form](#), the rest of the regulatory provision appears to be a performance standard the MIDAS database system is required to comply with.

This change is substantial for the ease of accessibility for the customer. Please explain why the MIDAS system can not support the regulatory provision for ease of accessibility.

Perhaps staff have overlooked that for "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.", for the data currently in MIDAS, no one has built composite signals of price, emergency events, and greenhouse gas emissions in one RIN.

What is the ability of MIDAS to contain and change values in a timely manner for all of the RINs a utility may need for each meter in their system. Has the MIDAS database been tested for latency? What was the result?

Will the MIDAS be fully functional and fully tested to support what the regulations mandate before the regulations are adopted?

Looking forward to your responses in the final statement of reasons.

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