

DOCKETED

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MISSION:DATA

April 20, 2022

Via Website Submittal

California Energy Commission
1516 Ninth Street, MS-29
Sacramento, CA 95814-5512

Docket No. 21-OIR-01, "Load Management Rulemaking"

RE: **Comments of Mission:data Coalition on Load Management Standards**

Mission:data Coalition ("Mission:data") is a national coalition of technology companies delivering data-enabled, energy management services and solutions. We hereby provide our comments pursuant to Commission Staff's April 5, 2022 *Corrected Notice of 15-Day Public Comment Period* (the "Notice").

Mission:data appreciates the efforts of Staff to develop and refine the Load Management Standards. Overall, Mission:data strongly supports the regulatory language proposed in the Notice.

Nonetheless, Mission:data believes that one important clarification is necessary to ensure that the Commission's intent is accurately reflected in the final language. We strongly recommend the Commission add the words "current and ongoing" to § 1623(c)(1)(A) as described below. Staff's proposed changes are in underline, and Mission:data's proposed addition is in **bold**:

§ 1623(c)(1)(A): Provide the **current and ongoing** RIN(s) applicable to the customer's premise(s) to third parties authorized and selected by the customer;

The above addition is critical because many customers will change their rate plans over time, and the language above ensures that devices and appliances will behave correctly – and serve the Commission's load-shifting objectives – after rate changes are made. If ongoing access to rate information is not clearly required by the Commission, then millions of devices and appliances could potentially be "orphaned" over time as consumers change their rates and consumers forget to update their appliances accordingly. By ensuring that RIN access is

ongoing, the Commission can avoid a situation in which the effectiveness of the Load Management Standards decreases over time due to normal rate-switching behavior. In other words, it is not reasonable to expect that the average consumer will make the effort via a manual process to keep his or her devices and appliances up to date with the current rate. Automating the process of receiving updates over time should be more explicitly required by the Commission in order to ensure maximum effectiveness.

Thank you for the opportunity to provide comments.

Respectfully submitted,

April 20, 2022

_____/s/_____
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