

**DOCKETED**

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### **OIR-21-03 Recognizing that electricity is a basic necessity**

OIR-21-03 Recognizing that electricity is a basic necessity

When recognizing that electricity is a basic necessity, it appears MIDAS does not have any capability to allow rate structures that ensure the necessary amount of electricity is made available to all California consumers at a just cost.

Do not adopt the proposed regulations without removing all prescriptive standards, making true, the Energy Commission's claim the proposed regulations are performance standards.

*Additional submitted attachment is included below.*

OIR-21-03 Recognizing that electricity is a basic necessity

Electricity is essential to the health, safety, and economic well-being of all California consumers.

The restructuring of the electricity industry will create a new electricity market with new marketers and sellers offering new goods and services, many of which may not be readily evaluated by the average consumer.

It is important to create a market structure that will not unduly burden new entrants into the competitive electric market, or California may not receive the full benefits of reduced electricity costs through competition.

It is appropriate to create a system of registration and consumer protection for the electric industry, designed to ensure sufficient protection for residential and small commercial consumers while simplifying entry into the market for responsible entities serving larger, more sophisticated customers.

It is the intent of the Legislature that electricity consumers be provided with sufficient and reliable information to be able to compare and select among products and services provided in the electricity market.

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.

The regulatory prescriptive requirement of the use of MIDAS does not agree with the Energy Commission's claim the proposed regulations are performance standards.

When recognizing that electricity is a basic necessity, it appears MIDAS does not have any capability to allow rate structures that ensure the necessary amount of electricity is made available to all California consumers at a just cost.

Do not adopt the proposed regulations without removing all prescriptive standards, making true, the Energy Commission's claim the proposed regulations are performance standards.

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