

**DOCKETED**

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*Comment Received From: TeMix Incorporated  
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**TeMix comment on Docket 21-OIR-03**

*Additional submitted attachment is included below.*



July 26, 2022

Submitted Electronically

Re: TeMix Comments on 2022 Load Management Rulemaking 21-OIR-03

Dear Commissioner McCallister,

I am writing on behalf of TeMix Incorporated. TeMix is a software and consulting company with a long history of working in electricity market planning and strategy. Currently TeMix is supporting the real-time pricing (RTP) pilot at Southern California Edison (SCE) and the agricultural pumping pilot at Valley Clean Energy/Pacific Gas and Electric (VCE/PGE.)

TeMix continues to support strongly all six steps of the CalFUSE vision. We are unlikely to see the full benefits of CalFUSE unless real-time, bi-directional, and subscription pricing options are universally available from the start of implementation. Subscription rates are particularly important to provide predictability and to avoid the crippling bill volatility of real-time prices seen in Texas in 2021.

TeMix continues to support pilot projects. Pilot projects are necessary for the smooth rollout of real-time pricing. However, pilot projects should be designed so there is a smooth transition from the pilot phase to widespread implementation. Pilot participants need the assurance that investments in load-shifting devices will realize long-term benefits.

There is one area where there is significant room for improvement in pilot project management. That is around contracting. Work began on both the SCE and VCE/PGE pilots before the end of 2021. It was not until May 2022, that contracts were in place between the major parties. This created project distractions and could have resulted in major delays. Furthermore, SCE is contracting with third-party automation system providers (ASTs) for connecting with pilot customers. ASTs could begin recruiting pilot participants from day one. However, the ASTs do not begin the process of recruiting customer participants and releasing data until they have signed contracts. The process of getting signed contracts has taken months. Anything the CPUC and CEC can do to address these delays will accelerate pilot start-up and completion.

Thank you for the opportunity to comment on this important undertaking.

Kind regards,

Steve Barrager  
Director of Consulting Services  
TeMix Inc.