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LMS-2023-01 Energy Commission Load Management Standards obligations

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The Commission maintains public access to the MIDAS database, this is the primary obligation of the Energy Commission for successful results in achieving the performance goals of Load Management Standards (LMS). This primary obligation became effective April 1, 2023.

The LMS regulations do not limit who may read or write data in the database.

Stop limiting who may read or write data in the MIDAS database.

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Additional submitted attachment is included below.

LMS-2023-01 Energy Commission Load Management Standards obligations

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The rules for public access to the MIDAS database say the database is populated by electric Load Serving Entities (LSEs) and other entities that are registered with the MIDAS system.

The rules for public access to the MIDAS database also say there are two types of accounts that can be used to interface with the MIDAS: LSE accounts and User accounts. For security of the system, only CEC-verified LSE accounts can upload (POST) data. User accounts can only query (GET) data from the MIDAS. This rule limiting who can upload data is not supported by the LMS regulations.

The rules for public access to the MIDAS database are not consistent. Consistency is a requirement of the Administrative Procedure Act (APA).

The rules for public access to the MIDAS database are not adopted pursuant to the APA, therefore are not enforceable.

The Energy Commission must comply with the APA and adopt the rules for access to the MIDAS database. To do otherwise is unlawful.

Stop limiting who may read or write data in the MIDAS database.

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