

DOCKETED

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OIR-19-01 Minimum Complement, Divide and Conquer

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Perhaps the value stream for the Load Management Rulemaking includes components that will unnecessarily increase costs, reduce innovation and reliability.

Of the components listed below only a modified version of component 3 and proper user documentation are required. All other tools or features listed appear to already exist or do not have any value worth paying for.

Please justify the need for components 1,2,4,5,and 6 by showing what those components provide beyond what component 3 and proper user documentation can do to solve the load management problem.

This list is from TN237439:

- 1.MIDAS Rate Database â€“complete
- 2.Rate Data Retrieval API â€“complete
Current price or future schedule in XML or JSON
- 3.Utility Rate Data Upload Tool â€“May 2021
XML schema for automated uploads from utilities
- 4.Automation Service Provider download tool (API): June 2021
- 5.Enable real-time data streams for GHG and LMP â€“July 2021
- 6.Enable real-time data streams for Flex Alerts â€“August 2021

Divide the work, don't duplicate data.

Why does the data have to be uploaded to, and retrieved from the MIDAS Rate Database? What value will the paying energy end user find in these steps?

Tools for writing and reading data as HTML, XML, JSON, DIF, DXF, CSV, and many other formats have existed for many years. No new tool designs are needed.

Each utility that has a website can host their rate and GHG data. Anyone wishing to use the data can use a URL to retrieve the data that would otherwise be placed in the MIDAS Rate Database. Less components means greater reliability and lower cost.

In "just in time" manufacturing, Kanban is often used and is a simple signboard or billboard, See [https://en.wikipedia.org/wiki/Kanban_\(development\)](https://en.wikipedia.org/wiki/Kanban_(development)).

A web page like this one <https://wwmpd.com/e-iq/eposi/smud/1-r-tod/rt02/index.html> can serve as a Kanban for load management.

Conquer the problem with science.

Ask the five whys for the load management problem and apply results to each component in your system. See https://en.wikipedia.org/wiki/Five_whys

I believe you will find some of the components from TN237439 list above will add to the problem and cost of the solution.

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