

DOCKETED

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RENEW, Dispatch, unambiguous use, 22-01

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Care should be take to avoid ambiguous use of the word "dispatch".

Dispatch can mean to "transact promptly" or "to dismiss".

Please provide the definition intended in the guidebook for "dispatch" and "dispatch period".

Additional submitted attachment is included below.

RENEW, Dispatch, unambiguous use, 22-01

Care should be take to avoid ambiguous use of the word "dispatch".

Dispatch can mean to "transact promptly" or "to dismiss".

Please provide the definition intended in the guidebook for "dispatch" and "dispatch period".

Dispatch is sometimes paired with the word "period" in the guidebook.

If "dispatch period" means a period of time during which delivery is done and if "dispatch" means to dismiss.

What does it mean to "to dispatch their load reduction resources"?

Does it mean dismissing of load reduction resources?

This website defines "dispatch" and "dispatch period", <https://www.lawinsider.com/dictionary/dispatch-period>.

"Dispatch means the act of reducing all or a portion of the electrical consumption of the PDR pursuant to a Dispatch Instruction."

"Dispatch Period (means) a period of time during which Williams has requested delivery of Net Electric Energy and/or the provision of Ancillary Services starting with a Beginning Requested Dispatch Hour and concluding with an Ending Requested Dispatch Hour. A Dispatch Period may continue for more than one calendar Day."

The above definitions make use the word dispatch as a technical term particular to a subject. Technical terms should not be used in rules.

All it takes is some computer code writer who considers dispatch to mean to dismiss, kill, stop, or inhibit resulting the reciprocal to what is desired. Reciprocal meaning opposite direction is given.

This is very much a preventable reliability issue.

Someone will choose the wrong definition for dispatch, thus fulfilling Murphy's law, "Anything that can go wrong will go wrong, and at the worst possible time."

If the Energy Commissions use of dispatch is like lawsinsider.com's, "to dispatch their load reduction resources" is redundant.

If read without redundancy, dispatch could be taken to mean stop use of their load reduction resources.

I believe the word dispatch should be replaced with more common words not particular to a subject.

The wording for logic for reward should use unambiguous words.

Enabling words for activity can be "start" or "begin".

Disabling words can be "stop" or "end".

Time periods should be called by name of action delineated by start and length, or start and stop time.

While the guidebook is exempt from the Administrative Procedures Act (APA), some of its wisdom should be followed.

APA says, "Plain English" must be used, as in "The agency shall draft the regulation in plain, straightforward language, avoiding technical terms as much as possible, and using a coherent and easily readable style. The agency shall draft the regulation in plain English.".

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