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LMS-2023-01 The Energy Commission fails to maintain public access to the MIDAS database

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Drew Bohan Executive Director California Energy Commission 715 P Street Sacramento CA 95814-5612

Dear Executive Director Bohan:

New Load Management Standards became effective April 1, 2023.

It appears Energy Commission staff do not have a way to upload data to MIDAS that is reliable.

How can the public trust a system that the Energy Commission has failed to make work properly?

Steve Uhler sau@wwmpd.com

Additional submitted attachment is included below.

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Drew Bohan Executive Director California Energy Commission 715 P Street Sacramento CA 95814-5612

Dear Executive Director Bohan:

New Load Management Standards became effective April 1, 2023.

It appears Energy Commission staff do not have a way to upload data to MIDAS that is reliable.

How can the public trust a system that the Energy Commission has failed to make work properly?

For RINs that start with "USCA-SGIP-SGRT-", the information returned is "Object reference not set to an instance of an object.". This means the API does not find data where required. These RINs are uploaded by Energy Commission staff.

The current implementation of MIDAS requires far more than providing a Rate Identification Number (RIN) to get any information from MIDAS.

Pursuant to 20 CCR 1623.1(c):

The Commission maintains public access to the MIDAS database through an Application Programming Interface (API) that, provided a Rate Identification Number (RIN), returns information sufficient to enable automated response to marginal grid signals, such as price, emergency events, and greenhouse gas emissions.

Pursuant to 20 CCR 1623(b):

The Commission maintains public access to the MIDAS-database through an Application Programming Interface (API) that, provided a Rate Identification Number (RIN), returns information sufficient to enable automated response to marginal grid signals including price, emergency events, and greenhouse gas emissions.

Please ensure the public has reliable access to MIDAS before enforcing any provisions of the new Load Management Standards other than the above listed regulations.

Steve Uhler sau@wwmpd.com