

October 30, 2020

Via Electronic Filing

RE: TeMix Inc.'s comments to OPUC's Drafted Guidelines for UM2005

To: Public Utility Commission of Oregon
Attention: Filing Center
P.O. Box 1088
Salem, OR 97308-1088

On behalf of TeMix Inc., we wanted to submit the following comments regarding OPUC's Draft Guidelines for UM2005 - better known as the Distribution System Planning docket. TeMix thanks the Commission and PUC staff for the opportunity to submit remarks and its commitment to creating a robust and effective DSP proceeding.

The OPUC and its staff throughout the course of UM2005 has not only conduct extensive proceedings but, moreover, adequately showcased "walking-the-talk" of their stated belief, on page 2 of their drafted guidelines, "...a new regulatory structure for DSP will enable utilities to better identify system needs and evaluate the evolving range of opportunities that can meet those needs. Staff wants to advance least-cost investments to modernize the grid as a foundation for optimization of the distribution system, in order to foster higher levels of customer access and interaction, and integration of variable resources." TeMix Inc. is looking forward to continuing to support these endeavors as the drafted guidelines become permanent and the permanent guidelines become action.

All throughout the proceedings, TeMix has introduced and held firm the concept that in order to fully support these stated beliefs, the discourse needs to not only address supply-side approaches critical to rolling out a successful DSP process but, that they should equally address demand-side approaches. In our response to Staff's questions leading up to the August 25th proceeding, TeMix pointed out that Oregon, OPUC and its stakeholders have the unique position to look no further than to its neighbor to the south (California) to glean, leverage and adopt the numerous advances this neighbor has taken to address this very same topic.

Looking over the drafted guidelines, in this context, TeMix, in general, supports all of the processes and procedures covered. Additionally, TeMix would like to also point to the fact that there are many details still needing to be defined for these topics and comment on how well-defined they are will ultimately lead to how firmly guided the subsequent proceedings will turn out. TeMix is encouraged, and continues to encourage Staff to place equal focus on incorporating the demand-side approach in the details as they will for the supply-side.

TeMix supports Staff's commitment that UM2005 can, "... advance least-cost investments to modernize the grid as a foundation for optimization of the distribution system, in order to foster higher levels of customer access and interaction, and integration of variable resources," and adequately addressing demand-side focuses is one area to further showcase OPUC's commitment.

One approach, of specificity, we would like to point is identifying the DSP should adopt the proven capability of sending Energy Prices tagged with corresponding GHG Emissions from the point of generation, down through the T&D system, to the end nodal connection point. This locationally-dynamically specific solution would be a means to effectively address and provide a solution to all the identified categories within Appendix 1. Not to mention, showcase how forward-thinking the Commission and its Staff are.

Furthermore, being this technology has already been demonstrated and proven, the OPUC and stakeholders can start day 1, after the finalization of these guidelines, to implement and start testing subsequent processes to further equate its effectiveness, and this is just one area, highlighting the demand-side approach benefit to DSP.

We look forward to assisting in any capacity to make these highlighted comments achieve scale.

Respectfully submitted,

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