

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

TeMix Inc. would like to submit the following comments regarding OPUC Staff's Drafted Guidelines for UM2005 – better known as the Distribution System Planning docket. TeMix thanks the PUC Commission and Staff for the opportunity to submit remarks as well as its commitment to creating a robust and effective DSP proceeding.

Throughout the course of the UM2005 docket the Commission and its Staff have not only conducted extensive proceedings but, equally showcased “walking-the-talk” of their stated belief, on page 2 of their drafted guidelines, by creating, “... 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 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 an effective DSP process but, should equally include demand-side approaches that can serve the success of the DSP process. In our response to Staff's questions leading up to the August 25<sup>th</sup> proceeding, TeMix pointed out that Oregon, OPUC and its stakeholders have the unique position to not have to look any further than to its neighbor to the south (California) to glean, leverage, and build-upon the numerous advances they have 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. Furthermore, TeMix would like to point to the fact that being that it may there are many details still left to be defined in these topics that will ultimately assist in capturing both demand-side and supply-side activities in subsequent DSP proceedings. TeMix is encouraged and continues to encourage Staff to place equal focus on incorporating both approaches when establishing these details.

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 has confidence by adequately incorporating demand-side approaches will only further highlight OPUC's commitment to this aspect.

To offer a detailed demand-side approach, of many, that could be incorporated in the final guidelines TeMix would like Staff to consider adding language about implementing the proven capability of sending energy prices tagged with corresponding GHG emission rates from the point of generation, down through the T&D system, to the end nodal connection point; known as a PRICE/GHG server. Incorporating this locationally-dynamically specific solution would be an effective means to adequately address all of the categories the Staff identified within Appendix 1; while at the same time, provide a “sandbox” scenario to assist in further DSP developments moving forward. Not to mention, showcase the forward-thinking commitment OPUC and its Staff have articulated throughout UM2005.

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

Respectfully submitted,

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Stephen MacDonald  
Managing Director of Business Development  
E: Stephen.MacDonald@TeMix.com  
P: 360.773.2781

/s/Stephen MacDonald