

RASC: RAN LMR Accreditation Tariff Language (20200304)  
OMS Resources Work Group

The OMS Resources Work Group (OMS RWG) appreciates the opportunity to provide feedback to MISO on the three proposed tariff filings planned for late April. This feedback does not constitute a position of the OMS Board of Directors.

The OMS RWG supports MISO's decision to not include the MISO Communications System (MCS) data for Load Modifying Resources (LMR) Accreditation in the April filing. In order to effectively work out the technical details surrounding the MCS data so that it might be included in a future accreditation filing, a focused task team will be needed. As such, the OMS RWG would be supportive of MISO reestablishing the Demand Response and MCS Alignment Task Team.

Additionally, the OMS RWG supports an 18-to-24 month transition period for implementing the LMR accreditation changes. This will allow Market Participants the necessary time to modify their tariffs and operations. Some states may need time to modify the relevant retail tariffs and rate books regarding LMRs.

The OMS RWG would also like an update on the implementation of the three RAN Phase I tariff changes with a focus on lessons learned.

Finally, the OMS RWG is concerned that MISO is only trying to increase the availability of LMRs by modifying LMR accreditation when MISO should also investigate moving some resources to an earlier spot during emergency operating procedures. While some LMRs are able to quickly respond to dispatch instructions, other LMRs are similar to generation resources in that they need longer lead times. Therefore, should it be determined that longer lead time resources have capacity value, perhaps a lower valuation could be appropriate if these resources are able to respond in a useful amount of time.