

**UNITED STATES OF AMERICA**  
**BEFORE THE**  
**FEDERAL ENERGY REGULATORY COMMISSION**

Midcontinent Independent System Operator     )

Docket No. ER22-1640-000

**NOTICE OF INTERVENTION AND COMMENTS OF THE**  
**ORGANIZATION OF MISO STATES, INC.**

Pursuant to Rules 211 and 214(a)(2) of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (the “Commission” or “FERC”), 18 C.F.R. §385.211 and §385.214(a)(2), the Organization of MISO States (“OMS”) submits its Notice of Intervention and Comments in the above-captioned docket. On April 14<sup>th</sup>, 2022, the Midcontinent Independent System Operator (“MISO”) filed its compliance filing in response to Order No. 2222.<sup>1</sup>

**I.     NOTICE OF INTERVENTION**

The OMS is a non-profit, self-governing organization comprised of representatives from the seventeen regulatory bodies with jurisdiction over entities participating in MISO and serves as the regional state committee for the region. The purpose of OMS is to coordinate regulatory oversight among its members, to make recommendations to MISO, the MISO Board of Directors, FERC, and other relevant government entities and state commissions as appropriate, and to

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<sup>1</sup> Participation of Distributed Energy Resource Aggregations in Markets Operated by Regional Transmission Organizations and Independent System Operators, 172 FERC ¶ 61,247 (2020) (“Order 2222”).

intervene in proceedings before the Commission to express the positions of OMS member agencies. As such, the OMS files its Notice of Intervention in this proceeding under Rule 214(a)(2), 18 C.F.R. §385.214(a)(2), of the Commission’s Rules of Practice and Procedure.

Service of pleadings, documents, and communications in this proceeding should be made on the following:

Marcus Hawkins  
Executive Director  
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## **II. COMMENTS**

### **A. SUMMARY**

OMS appreciates this opportunity to comment on MISO’s compliance filing and encourages FERC to require MISO to implement Order 2222 in a timelier fashion, with an implementation date similar to MISO’s Multiple Configuration Resources (“MCR”) initiative or some other nearer term date than the one currently proposed by MISO that would allow for DER-aggregation participation in wholesale markets to align with the planned implementation dates of other Regional Transmission Organizations (RTOs) planned implementation dates.

### **B. BACKGROUND**

OMS has identified Distributed Energy Resources (“DER”) as one of the organization’s strategic priorities since 2017. Recognizing the “overlapping jurisdictional framework” under

which DERs operate, the states believed it would be important for “OMS [to] take a leadership role on the integration of DERs onto the bulk electric system and into wholesale markets.”<sup>2</sup> These efforts kicked off a multi-year collaboration between OMS and MISO that served as an early model of the “coordination framework” later contemplated by the Commission.

The OMS and MISO have been working collaboratively in this area since that time and formally laid out a set of joint priorities related to DER integration into both retail and wholesale markets in 2018.<sup>3</sup> These priorities were “established to prepare for the future of DER in the MISO footprint” and transparently share our organizations’ proactive efforts toward DER integration. Through these efforts, OMS and MISO identified key work streams related to stakeholder education, information exchange, and other roles and responsibilities that could be impacted due to increased levels of DER. In pursuit of our common objective to find a joint “optimal solution for the unique needs of the MISO region” the organizations updated these priorities in 2020 considering the Commission’s issuance of Order 2222 and evolution of our identified work streams.<sup>4</sup>

As discussed further below, many individual members of OMS have undertaken state-specific activities to address DER integration within their jurisdictions, and OMS has endeavored to bring visibility to best practices and key learnings as its members move forward with their own initiatives.

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<sup>2</sup> Organization of MISO States, Inc. OMS Approach on Distributed Energy Resources (June 15, 2017) available at: [https://www.misostates.org/images/PositionStatements/OMS\\_DER\\_Overview\\_and\\_Work\\_Plan\\_Document.pdf](https://www.misostates.org/images/PositionStatements/OMS_DER_Overview_and_Work_Plan_Document.pdf).

<sup>3</sup> Organization of MISO States, Inc., DER Priorities Document (November 13, 2018) available at: [https://www.misostates.org/images/PositionStatements/DER\\_Priorities\\_Document.pdf](https://www.misostates.org/images/PositionStatements/DER_Priorities_Document.pdf).

<sup>4</sup> Organization of MISO States, Inc., OMS-MISO Joint DER Priorities (July 13, 2020) available at: [https://www.misostates.org/images/PositionStatements/Item\\_6\\_OMS-MISO\\_Joint\\_Priorities.pdf](https://www.misostates.org/images/PositionStatements/Item_6_OMS-MISO_Joint_Priorities.pdf).

## C. MISO'S PROPOSAL

### 1. Implementation Timeline

MISO has requested that Order 2222 become effective in the MISO region on October 1, 2029, with Distributed Energy Aggregated Resources (“DEAR”) able to participate in the MISO’s Energy and Operating Reserve markets in early 2030, in addition to participating in the MISO Planning Resource Auction in the spring of 2030. MISO states that this extended implementation timeline is necessary primarily because other MISO priorities will deliver more benefits and, secondarily, that states and other entities need time to prepare for implementation.

Below, OMS argues that Order 2222 should be implemented sooner than 2030 in order to take advantage of the reliability and economic benefits of DER aggregation as contemplated by FERC’s Order and direction to RTO/ISOs.

#### *OMS Does Not Dispute the Reliability and Economic Benefits of Other Priorities*

MISO cites two initiatives that MISO asserts will create more reliability and economic benefits in the near term than Order 2222 implementation: its Market System Enhancement (“MSE”) and its MCR initiative.

MISO writes that the total benefit of its MSE work is \$433 million, and that the new system should be completed in late 2024.<sup>5</sup> Based on the evidence that MISO has provided, OMS agrees that MSE is a prerequisite for Order 2222 and that it would be inefficient to implement Order 2222

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<sup>5</sup> *Midcontinent Indep. Sys. Operator*, “Order No. 2222 Compliance Filing” at p. 33, Docket No. ER22-1640-000 (April 14, 2022) (“MISO Compliance Filing”).

on the legacy system when the MSE is near completion.<sup>6</sup> Other regions are undergoing similar IT system overhauls, and OMS believes it is appropriate to allow these enhancements to be completed prior to implementation of Order 2222.

Once MISO completes its MSE work in late 2024, it plans to prioritize the implementation of its MCR initiative before making the needed changes to allow DER aggregations to participate in its wholesale markets.<sup>7</sup> MISO attempts to make the case that MCR's \$14 million – \$34 million in annual benefits are worth prioritizing over Order 2222 implementation.

*OMS Questions How MISO Arrived at Its Final Prioritization*

MISO points as justification for its proposed delayed implementation to its high fleet change scenario, Future 3, that projects 18.9 GW of DERs to be installed, as compared to an additional 100 GW of gas-fired units. MISO writes, “Unlike MCR, the potential quantity of distributed energy resource aggregations, both number of aggregations and capacity in megawatts, is unknown.” Relying on this justification is problematic for multiple reasons, but primarily because the gas-fired units added in MISO Future 3 are not necessarily Combined Cycle Units that would benefit from MCR, or even actual gas-fired units for that matter. MISO's expansion planning process relies heavily on gas-fired units as placeholders for unknown future resources, such as hydrogen or advanced nuclear.

Notably, MISO does nothing to analyze the potential benefits of implementing this rule sooner. Nor does MISO quantify the potential harm to consumers from delaying DEAR

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<sup>6</sup> Organization of MISO States, Inc. Letter to the Commission (Ma4 14, 2021) stating that OMS did not oppose MISO's Order 841 extension request. Available at: [https://www.misostates.org/images/stories/Filings/FERC/2021/C2\\_841\\_Extension\\_Letter\\_FINAL\\_JF\\_Signature.pdf](https://www.misostates.org/images/stories/Filings/FERC/2021/C2_841_Extension_Letter_FINAL_JF_Signature.pdf)

<sup>7</sup> MISO Compliance Filing at p. 33-34.

integration. While Future 3 projected high volumes of gas-fired units, those high volumes were projected during a time of low gas prices, prices that have dramatically increased since Future 3 was released. Additionally, the 18.9 GW of DERs is the anticipated level of DER without the wholesale market incentive that FERC intended that MISO create. MISO's reasoning of 'low anticipated DER' (compared to new natural gas) directly contradicts FERC's intent with Order 2222 creating a market and spurring use of existing and future DER.

Further, OMS does not believe this rule and the Commission's previous rule on flywheel integration into wholesale markets are similar, primarily due to the diversity of resources that Order 2222 addresses. Indeed, some states already have demand response aggregators operating within their borders in at least some fashion.

MISO says it is difficult to understand the benefits of DER aggregations' potential now, but the sooner barriers are removed, the sooner the MISO region and its stakeholders can begin to maximize the benefits of these resources. Some states are placing a high value on the optionality Order 2222 provides to the available resource mix in their state and region. Both MCR and Order 2222 have significant reliability and economic benefits, and neither should be prioritized over the other – both are needed, especially considering the recent shortfalls shown in the April 2022 Planning Resource Auction and the increased penetration of renewables coming online and entering the queue. Flexibility and rapid deployment of resources is paramount. The notion of waiting until 2030 to make use of resources existing today (and resources coming online rapidly over the next decade) is counter to FERC's Order 2222 intent.

Lastly, the Commission must remember that MISO and its members are likely to not prioritize Order 2222 implementation unless directed to, which was a primary reason for FERC issuing Order 2222 in the first place.

*MISO Should Implement Order 2222 and MCR on Parallel Paths*

OMS recognizes the importance and benefits of MSE and MCR, but questions MISO's purported inability to pursue a parallel path for the implementation of MCR and Order 2222. MISO does not provide sufficient evidence why parallel implementation is not possible outside of a generic description that pursuing these changes simultaneously would increase the risks to reliably implement these products.<sup>8</sup> Other RTOs, such as PJM, are intending to implement their Enhanced Combined Cycle model in parallel with their new Market Clearing Engine in 2025.<sup>9</sup> From the testimony MISO provided, it is unclear why MISO cannot do the same.

It is worth noting that MISO originally received stakeholder support for its MSE project due to the new system's modular capabilities, which would allow for more frequent changes to be implemented. The flexibility and adaptability to quickly implement new tools was a major justification for the project. This proposed implementation timeline seems to indicate that a major benefit of the MSE investment will not be realized.

OMS believes that Order 2222 implementation will be needed sooner than 2030. MISO seems to understand this need as well but has instead decided to focus only on demand response. MISO clearly understands the reliability value that certain DER provides to the market and intends to move forward with a project to shift demand response products from "emergency only" to more market-responsive demand in the near term.<sup>10</sup> The intended results of this effort would be achieved

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<sup>8</sup> MISO's single paragraph describing their reasoning is included in Ramey testimony, pg. 1629.

<sup>9</sup> PJM's April 13<sup>th</sup> Market Implementation Committee presentation: <https://www.pjm.com/-/media/committees-groups/committees/mic/2022/20220413/informational-only---ngem-update.ashx>.

<sup>10</sup> Further modifications to LMR accreditation are planned to be discussed in the MISO Resource Adequacy Subcommittee, see RASC management plan available at: <https://cdn.misoenergy.org/20220525%20RASC%20Item%2001d%20Management%20Plan624727.pdf>

through a more near-term implementation of Order 2222. FERC should direct MISO to implement MCR and Order 2222 in parallel, or at a minimum order MISO to describe in sufficient detail why parallel implementation is not possible, and at least ensure planning for Order 2222 implementation is not put on hold.

*MISO's DER-Aggregation Model was a Short-Term Compromise*

During MISO's stakeholder process dedicated to Order 2222 compliance, there was much discussion that suggested MISO's initial compliance would require compromises based on what is technically feasible with *today's* systems, technologies, and processes and that the solutions ultimately selected by MISO were admittedly the "rough draft" or "Phase 1" that would need refinement as the market was developed and as the region had experience with this very new resource type. This included components such as the single node locational limitation, variation in metering, telemetry, and the frequency of modifications in an aggregation.

Members of OMS were engaged throughout the stakeholder process and generally supported these near-term compromises as stakeholders agreed and acquiesced, expecting a reasonable implementation date. OMS members and other stakeholders recognized near-term constraints at MISO (e.g., technology and visibility) and limitations with other resource participation attributes that were looked to for similarities. Members of OMS filed multiple comments to MISO throughout the process, always noting that reassessment of the market product would be needed and prioritized. An expectation of a continual process improvement built into MISO's compliance filing was instead replaced with an 8-year implementation timeline for 'phase 1.'

MISO did not propose their 2030 timeline until February 2022, which caught many parties off-guard and may have impacted the positions OMS took earlier in the stakeholder process. Had such a late implementation date been anticipated, OMS likely would have sought a phased-in approach that would allow DER participation in the near term in order to access at least some benefits of DER aggregation prior to full implementation. Options such as limiting near term participation to homogenous aggregations or customer class types were never considered. While full implementation of Order 2222 prior to 2030 would be ideal, a phase-in approach may be reasonable and provide a balance between the technical limitations of MISO's systems and policy objectives should parallel implementation of Order 2222 and other needed system upgrades not be possible before 2030.

Another major challenge to a 2029/2030 implementation date is the speed at which DERs are changing and proliferating. In fact, much of the MISO-filed DEAR participation model will likely be outdated by 2029-2030; especially because MISO repeatedly noted that their participation attributes were restricted to near-term constraints. An ideal DER aggregation model for 2030 is likely to be very different than what was created with stakeholders and filed currently.

*State Readiness is Not a Valid Reason for Delay*

In addition to pointing to the reliability and economic benefits of its ongoing initiatives as reason to delay implementation, MISO claimed the benefits of DER aggregation are unknown and potentially limited by retail regulatory constructs that “will need to be updated to address the forthcoming shift in the distributed energy paradigm.”<sup>11</sup> Richard Doying testified that “12 of the 15 states within MISO do not allow for Demand Response participation by Aggregators of Retail

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<sup>11</sup> MISO Compliance filing, pg. 34.

Customers in wholesale markets, which significantly limits the resources that could participate.” OMS notes that this limitation does not take into account RM21-14,<sup>12</sup> which may negate this issue entirely, or open state dockets which address the status of current DR aggregation bans, or recent efforts to reconsider their positions and their relation to Order 2222.<sup>13</sup> He also testified that retail regulators and distribution companies “have indicated the potential need for legislative, retail tariff or other regulatory changes, which may require an extended timeline to complete.”<sup>14</sup>

OMS rejects the characterization that it is the states that are the primary, or even a contributing, driver to delay the implementation of Order 2222 in the MISO region. Most states in MISO are also in PJM or SPP. PJM’s implementation date is February 2, 2026, and SPP’s implementation date is targeted for the third quarter of 2025.<sup>15</sup> Since the majority of retail regulators in the MISO region will have to be ready by the time PJM and SPP implement Order 2222, retail regulators will not be the reason to delay implementation of Order 2222. Even certain states that are primarily or wholly within MISO are concerned that if the Commission approves MISO’s proposed implementation date many near-term opportunities that could benefit customers will be lost. Some states understand that MISO is resource-constrained and that if choices have to

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<sup>12</sup> OMS is not modifying its already-filed position in this docket, available at: [https://www.misostates.org/images/stories/Filings/FERC/2021/20210723-5147\\_RM21-14\\_-\\_OMS\\_DR\\_NOI\\_Comments.PDF](https://www.misostates.org/images/stories/Filings/FERC/2021/20210723-5147_RM21-14_-_OMS_DR_NOI_Comments.PDF)

<sup>13</sup> For example, Michigan PSC’s docket U-20348 and Arkansas PSC’s Docket Nos. 09-090-U and 20-027-U. The Arkansas dockets are considering whether the Commission should authorize aggregations of DR pursuant to authority granted by the Arkansas General Assembly by the “Regulation of Electric Demand Act of 2013,” Act No. 1078, Ark. Code Ann. §23-18-1001 *et seq.* More specifically, pursuant to Ark. Code Ann. § 23-18-1003(b)(1), the Commission “[m]ay establish the terms and conditions for the marketing , selling, or marketing and selling of demand response by electric public utilities or aggregators of retail customers to retail customers or by electric public utilities, aggregators of retail customers, or retail customers into wholesale electricity markets....” In short, Arkansas’s statute neither allows nor bans such aggregation, but leaves the decision whether to authorize it to the Commission. Until the filing of Docket No. 20-027-U by Walmart in 2020, no utility customer or utility company had requested approval of aggregation of DR and sales into wholesale markets.

<sup>14</sup> MISO Compliance piling, pg. 1610.

<sup>15</sup> ER22-1697.

be made, it makes sense to prioritize reliability improvements in the near-term over the implementation of Order 2222. However, other states see DER aggregation as a needed market product to improve reliability using resources that are already available or capable of being added rapidly. The basic fact is the sooner MISO implements Order 2222, the sooner it is likely to receive the reliability benefits associated with DER aggregations, incentivize their participation, and provide a market that properly values these resources.

Some states already have open regulatory proceedings ongoing to prepare for Order 2222 implementation. Other states are even directed by statute to prepare for 2222 and/or support the growth of DERs and DER aggregations.<sup>16</sup> OMS is cognizant of the fact that implementing rules such as Order 2222 always come with unanticipated roadblocks and is concerned that should the Commission approve MISO's current proposed 2030 implementation date, it will slip much in the same way that MISO's Order No. 841 implementation date for storage has slipped.<sup>17</sup>

Finally, while some states are admittedly resource constrained, this implementation date was a key piece in assessing where to prioritize Order 2222 changes at the state level. A 2030 date moves the prioritization of the implementation needs out, replacing them with more near-term state needs, which creates the self-fulfilling prophecy of 'states taking years to be ready.' If a nearer-

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<sup>16</sup> Illinois Energy Transition Act, aka Illinois Climate and Equitable Jobs Act, Public Act 102-0662 (2021), directs the Illinois utilities to file Multi-year Integrated Grid Plans and directs the Illinois Commerce Commission to hold workshops to inform the filing requirements of these plans in support of, among other things, Illinois policy goals promoting distributed energy resources and investments in renewable energy resources, <https://www.ilga.gov/legislation/publicacts/102/PDF/102-0662>. Indiana Code chapter 8-1-40.1, titled *Rulemaking to Implement Federal Energy Regulatory Commission Order*, directs the Indiana Commission to adopt rules necessary to implement Order 2222 concerning distributed energy resources and distributed energy resource aggregators, and allows for amendments to its net metering and interconnection rules. IN Stat. 216B.1611, *Interconnection of On-Site Distributed Generation* notes the purpose is to, "promote the use of distributed resources in order to provide electric system benefits during periods of capacity constraints" and Minn. Stat. 216B.243 requires that no large energy facility should be built until it is proven that load-management and distributed generation alternatives are not cost-effective, among other DER-centric preferences.

<sup>17</sup> OMS [letter](#) to FERC stating it did not oppose MISO's extension request in order to avoid further delay of the MSE.

term date is selected, states will act – as states are currently doing for the PJM and SPP compliance dates.

*If a 2030 Implementation is Allowed, a Phased Alternative Should be Required*

Should the Commission agree with MISO that a parallel implementation is not possible, FERC should direct MISO to pursue a phased approach for implementation prior to 2030.

**2. OMS Supports Many of the Reforms in MISO’s Compliance Filing and Recognizes the Roles of Relevant Electric Retail Regulatory Authorities (RERRAs)**

OMS generally supports the content of MISO’s compliance filing and supports the necessary components of cooperative federalism contained therein. MISO appropriately requires DERs to complete a retail interconnection, for those DERs subject to RERRA interconnection requirements, as a pre-condition for participation in a MISO DEAR.<sup>18</sup> MISO correctly includes this step as occurring outside of the MISO process, which could also interact with any voluntary pre-registration process that RERRAs may wish to create.<sup>19</sup> As DEARs move through the MISO registration process, MISO has included “touch points” with the Distributed Energy Resource Aggregator (“DERA”), Load Serving Entity, Electric Distribution Company (“EDC”), and RERRA that underscore the multi-jurisdictional impacts of Order 2222 and the need for coordination amongst these entities. Similarly, the DERA, Local Balancing Authority (“LBA”) and EDC each have defined roles in operational coordination, which may also be undergirded by RERRA rules governing operational overrides of DERAs.

MISO’s proposed registration process, including the 10-day compatibility check and 60-

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<sup>18</sup> MISO Compliance filing, pg. 17.

<sup>19</sup> MISO Compliance filing, pg. 1666-1667.

Day EDC technical review, ensures each entity can review DEAR impacts and appropriately balances the efficiency of the registration process with an important assessment of distribution system impacts; however, the 10-day window allotted for the RERRA double counting review may be tight for some RERRAs. OMS recommends some flexibility in this oversight step. We note that states, including state utility regulatory commissions, do not agree to assume any liability or obligation regarding MISO's expectation of a RERRA confirmation regarding double counting and/or any other confirmations requested, including but not limited to any confirmations regarding retail rates. In this respect, it is important to recognize that neither MISO nor the Commission may impose obligations upon RERRAs in the implementation of MISO's tariffs. While MISO defines the process and guidelines for an appropriate EDC technical review, OMS notes that RERRAs ultimately have oversight over EDCs and therefore RERRA rules may also impact how an EDC conducts its technical review to ensure the reliability of the distribution system. This is particularly true at the end of the technical review, when the EDC makes its determination and identifies any needed system upgrades needed for DERA participation. MISO rightly acknowledges that the option for system upgrades "should be handled by mutual agreement between the EDC and DERA – subject to RERRA oversight."<sup>20</sup> OMS agrees with this assessment and recognizes that distribution system upgrades would be subject to RERRA jurisdiction. MISO also recognizes that EDCs, Transmission Owners, and MISO may incur costs as part of the DERA Technical Review and suggests that RERRAs may wish to adjust their regulations to require DERAs to fund their technical reviews to ease the burden that might otherwise fall on general ratepayers.<sup>21</sup> OMS recognizes this potential impact

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<sup>20</sup> MISO Compliance filing, pg. 19.

<sup>21</sup> MISO Compliance filing, pg. 22.

and agrees that RERRAs will need to examine this issue to determine the appropriate cost assignment for entities under their jurisdiction.

Each of the aforementioned areas underscore the need for communication between these entities, and particularly creating communication pathways between the DERA and EDC, which may not exist today. While MISO defines communication pathways in several areas of their compliance, MISO does call out instances where the DERA, EDC, and LBA are expected to create independent communication streams to fulfill their roles.<sup>22</sup> OMS recognizes that RERRAs may wish, but are not required, to play an enabling role by creating DERA-EDC communication pathways to buttress RTO procedures or fill in gaps where they may exist. OMS notes that the primary responsibility for creating these communication pathways falls on MISO, but as the RTO begins to solidify these pathways in its Business Practice Manuals, OMS intends to follow this process closely to identify any gaps and implications for RERRA jurisdictional procedures and potential action.

OMS also appreciates MISO's distinction on which types of disputes are eligible to go through MISO's existing Dispute Resolution process, namely, disputes regarding the coordination or application of the EDC review processes relating to registration or enrollment.<sup>23</sup> MISO in its filing also suggests, but rightfully does not attempt to require, that RERRAs may be best positioned to handle disputes between the DERA and the EDC. OMS recognizes this point and envisions several instances where RERRA dispute resolution may be preferable to MISO dispute resolution under Order 2222, should each RERRA determine to adopt such proceedings.

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<sup>22</sup> MISO Compliance filing, pg. 15-16.

<sup>23</sup> MISO Compliance filing. Pg. 30 and 1690.

Generally, disputes regarding matters under state jurisdiction should be adjudicated at the state level. Disputes regarding the outcome of EDC decision points may not necessarily fall under MISO's authority such as: 1) any voluntary pre-registration process created by the RERRA, 2) the compatibility check and technical review during DERA registration, and 3) disputes regarding EDC overrides. Each of these issues represent areas where the RTO and/or FERC may lack the necessary jurisdiction and expertise to adjudicate such matters. Therefore, each RERRA will need to determine whether to take these disputes up and whether new rules and regulations should be created to guide these new processes.

### **III. CONCLUSION**

While MISO's compliance filing outlines the necessary processes governing Order 2222, it is important to note that conversations regarding the details on implementation will need to continue in stakeholder forums to refine processes and align RTO and RERRA processes. MISO has rightfully indicated that it intends to continue to work with stakeholders and offer a forum to discuss outstanding issues. While MISO's DER Task Force (DERTF) addressing Order 2222 and other DER issues was scheduled to sunset in July 2022, MISO's Steering Committee approved the motion to extend the DERTF.<sup>24</sup> This extension of this much-needed committee will serve as an important forum for conversations between MISO, OMS, EDCs, DERAs and other stakeholders to iron out the details of implementation and inform aspects beyond MISO's authority that may need to be addressed by RERRAs and EDCs. OMS intends to be highly engaged in these conversations and looks forward to working with other stakeholders on

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<https://cdn.misoenergy.org/20220518%20SC%20Item%2006c%20DERTF%20Extension%20Proposal624600.pdf>.

outstanding issues.

OMS submits these Comments because a majority of OMS members support them. Individual OMS members reserve the right to file separate comments regarding the issues discussed in these comments.<sup>25</sup> The following members generally support this filing:

Arkansas Public Service Commission  
Illinois Commerce Commission  
Indiana Utility Regulatory Commission  
Iowa Utilities Board  
Kentucky Public Service Commission  
Louisiana Public Service Commission  
Michigan Public Service Commission  
Minnesota Public Utilities Commission  
Mississippi Public Service Commission  
Missouri Public Service Commission  
Council of the City of New Orleans  
South Dakota Public Utilities Commission  
Public Utility Commission of Texas  
Public Service Commission of Wisconsin

The Manitoba Public Utilities Board and the Montana Public Service Commission did not participate in the vote on this filing. The North Dakota Public Service Commission abstained.

Respectfully submitted,  
*/s/ Marcus Hawkins*  
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Dated June 6<sup>th</sup>, 2022

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<sup>25</sup> The Public Utility Commission of Texas generally supports these comments, but abstains to the extent these comments address or implicate matters of resource adequacy.

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list prepared by the Secretary for the above-captioned docket in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure. 18 C.F.R. § 385.2010.

DATED at Madison, Wisconsin this the 6<sup>th</sup> of June 2022.

*/s/ Marcus Hawkins*

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