

The Organization of MISO States Resources Work Group (OMSRWG) agrees with MISO's assessment of the Resource Adequacy Sub-Committee (RASC) priorities for 2019.<sup>1</sup> MISO's proposed high priorities of the Resource Availability and Need (RAN) Loss of Load Expectation (LOLE) Assumptions and Capacity Accreditation and Requirements are supported by the OMSRWG as key targeted projects for 2019.

Working with stakeholders on shortening the time period for the LOLE analysis, assumptions, capacity procurement process, (especially for the shoulder seasons when many generation units and transmission lines are out on maintenance) - could benefit all participants by fostering increased coordination on unit outage planning, availability of transmission lines, and capacity resources. The OMSRWG has supported the concept of moving from the annual construct to a more seasonal or monthly construct since 2013-2014.

MISO has voiced its concern over the increased number of maximum generation (max gen) emergency events over the past two years, especially in non-peak months. Currently MISO is targeting the low hanging fruit of changing the MISO Tariff or BPM for the notification minimum of having demand side resources participate during a max gen warning/event from twelve hours to a reduced notification timeframe of some specific hours. MISO should continue to analyze the availability and capacity of these demand-side resources and intermittent resources. RAN is one of OMS's top priorities in 2019.

The OMSRWG also supports MISO's proposed medium and low priorities as listed in the 11/7/18 RASC 2019 priorities presentation but recommends that Distributed Energy Resources (DERs) be moved from a low priority to a medium priority. DERs are also a top priority of OMS in 2019. We consider them to be an emerging capacity and energy resource along with Energy Efficiency (EE) and Energy Storage Resources (ESRs). The aggregation of DERs, EE, and ESRs from Alternative Electric Suppliers or Load Serving Entities could prove to be complicated and detail-oriented process, and thus requires much clarification from the RASC.