RASC: RAN LMR Accreditation and LOLE Modeling 20200122

In the January 8 meeting of the Resource Adequacy Subcommittee (RASC) stakeholders were invited to submit feedback on proposed utilization of MISO Communications System (MCS) for Load Modifying Resource (LMR) accreditation and Loss of Load Expectation (LOLE) modeling improvements. Please consider the following questions in your response:

How should MISO phase in data for LMR accreditation?

How should the number of calls/length and lead-times of LMRs be factored into accreditation?

What other LOLE modeling improvements do stakeholders recommend?

At a high level, the OMS Resources Work Group (RWG) agrees with these improvements but would encourage MISO to implement these proposals only after it has concluded any work on a seasonal resource adequacy construct.

LMR Accreditation

The RWG is generally supportive of better aligning LMR accreditation with actual availability. However, it was clear from stakeholder discussions that MISO has yet to provide data that accurately reflects LMR availability. The gap between offered and available needs to be better understood. Some resources may show zero availability because they were deployed by an LSE, reducing demand, and having the same impact as if MISO were to dispatch the resource. Capacity credit should not be decreased for delivering the same impact through different channels.

The seasonality of LMRs needs to be considered for the phasing in of data for LMR accreditation. Using MCS data to de-rate an LMR throughout the entire year, when it may have perfect availability during one or more seasons, does not provide MISO's operators with accurate or useful information.

Also, the OMS RWG encourages MISO to consider the impact this proposal may have on certain resources such as demand response programs. Some resources may be penalized for not increasing the number of calls that it is able to respond to in a given year when a state tariff is the reason a particular resource was not able to respond. As such, the OMS RWG encourages MISO to not penalize resources that are bound by state tariffs from complying with this MISO proposal.

LOLE Modeling

MISO states that the purpose of this proposal is to "better define risks throughout the year." The OMS RWG agrees that this is a useful proposal, but again believes it would be better to pursue this after MISO has implemented its seasonal resource adequacy improvements. The OMS RWG has previously stated in written comments, "The OMS RWG believes that, for purposes of the LOLE study, MISO should model outages that most closely reflect reality as possible," and that appears to be what MISO is trying to achieve here. MISO should model all actual information available in the LOLE modeling.