

OMS DER WG Feedback  
Modeling User Group (MUG) MISO MOD-032 (20200521)

The OMS DER Work Group (DERWG) appreciates the opportunity to submit feedback on the proposed changes to the MISO MOD-032 data requirements and reporting procedures document. These comments do not express the views of individual OMS Members or the OMS Board of Directors.

The DERWG believes that the proposed changes have many policy, legal (including but not limited to federal, state, and tariff issues), and technical implications, particularly for new requirements and recommendations under section 3.2.13 (Distributed Energy Resources), that make discussion of the changes inappropriate for the Modeling User Group (MUG). Discussing these changes at a small technical user group without discussing the issue at either the Steering Committee or Planning Advisory Committee first seems inappropriate due to the scope and implications of the proposed data requirements.

Similar to other changes proposed throughout the MISO stakeholder process, the DERWG believes a clear need for any changes should be demonstrated and discussed with stakeholders. The OMS Board recognizes the potential need for increased levels of information exchange related to DERs.<sup>1</sup> However, the review of the type, purpose, and the technical and legal ability to gather and release information related to DERs needs to be considered within the appropriate policy and technical forums, not merely at the MUG level. MISO should consider moving modeling guidance documents into Business Practice Manuals to ensure sufficient levels of review are conducted before changes are enacted.

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<sup>1</sup> [https://www.misostates.org/images/PositionStatements/DER\\_Priorities\\_Document.pdf](https://www.misostates.org/images/PositionStatements/DER_Priorities_Document.pdf)