

## OMS RWG Feedback on RAN

Due: June 24<sup>th</sup>

### **1. RAN Reliability Requirements proposed problem definition and priority adjustments to inputs for higher fidelity analysis in the valuation of options**

Several members of the OMS RWG generally agree with the three problem statements but note that there are many outstanding details that remain to be worked out.

Other members of the RWG find that MISO has presented insufficient empirical data and analysis to demonstrate that problems exist that warrant moving immediately to identify and implementing solutions.

The RWG believes additional reliability metrics first need to be identified. Then MISO should conduct and present an analysis showing where we are today and where we will be in the future for each of these metrics. Before we can understand and evaluate potential approaches to setting requirements, we need to fully understand the various reliability metrics and the definitions of what constitutes a requirement, target, and metric.

The RWG also believes that risks identified based on events and data from the recent past must be analyzed under future resource mixes. This will help in assessing the magnitude, extent and distribution of each risk in the future.

Additionally, the RWG believes a fourth item should be added to the problem statement highlighting the role of state and local regulators in planning for and ensuring resource adequacy. The problem statement should identify that MISO's analysis of risks lacks visibility into state/local planning processes and the extent to which those processes account for various aspects of reliability.

### **2. RAN Resource Accreditation revised problem statement**

#### ***1. What additional analysis or evidence would stakeholders like to see that may or may not substantiate the problem statement?***

The RWG believes that additional analysis on the role of transmission outages in past MaxGen events is needed. This will help ensure we are not pursuing a resource fix to resolve a one-off transmission system problem.

#### ***2. How should MISO go about aligning planning and operations?***

Regarding a potential sub-annual construct, the RWG believes that MISO first needs to identify the parameters of what a sub-annual construct would look like before making further accreditation changes. Any changes to accreditation based on resource performance in non-summer months needs to be clearly linked to an assessment of resource needs during those time periods.

The RWG believes it is important to have accurate and reliable information on resource availability and expected performance throughout the year. It is not clear at this point whether an "incentive" is needed to encourage operational performance, or alternatively just a demonstration of need and appropriate accreditation during all time periods.