

During the November 29, 2021 Distributed Energy Resources Task Force (DERTF) meeting, MISO presented Iteration 6 of FERC Order 2222 Filing Framework. Stakeholder feedback is requested with focus on the following:

- DEAR deliverability for MISO capacity market participation proposal
  - Is the proposed method for determining deliverability sufficient?
  - If not, what other methods should MISO consider for DEARs to demonstrate deliverability in order to qualify for the capacity market?
- Operations coordination framework proposal
- Registration coordination framework proposal

<https://www.misoenergy.org/stakeholder-engagement/stakeholder-feedback/dertf-filing-framework-document--iteration-6-ir070-20211129/>

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#### DEAR Deliverability

The OMS DER Work Group recognizes that coordination between the DERA and EDC is important and necessary and will likely interact with state authority. OMS acknowledges this issue and looks forward to engaging in the coordination framework discussion at an upcoming IPWG meeting.

#### Operations coordination framework

The OMS DER Work Group would like to suggest that MISO add a separate line for RERRA coordination that illustrates where MISO thinks RERRA action may be needed. One area, as referenced above, may be setting up communications between the DERA and EDCs to ensure that each entity has the information it needs to operate the distribution system in a reliable manner. The OMS DER WG recognizes this may be a state-by-state determination, but thinks it is important to include potential RERRA roles in order to fully represent all interactions on a single chart. Including all interactions (both mandatory and suggested) will also help inform stakeholders and RERRAs of any gaps in the operational coordination process.

#### Registration coordination framework

The OMS DER Work Group appreciates Slide 108 where MISO outlines processes where MISO is *not* involved. Slides like these help RERRAs focus their attention on potential gaps that fall outside of the MISO process and will help individual RERRAs make decisions regarding any insufficiencies.

Regarding Slides 110-112, the OMS DER WG would like to ask what MISO envisions for the RERRA double counting check. Would this include a review of any retail tariffs the DERs may be enrolled in and a verification of whether that resource, particularly dual use resources, may participate in MISO's markets? If so, it may make sense for the "RERRA double counting check"

to occur simultaneously with the last ten business days of EDC reliability review, or directly thereafter. Generally, RERRA's do not have access to individual customer data, therefore, in order to perform the double counting check the RERRA would need to confidentially acquire this data directly from MISO or through the EDC. (This also applies to DR aggregation today.) Having the "RERRA double counting check" occur simultaneously with the EDC reliability review may be ideal, as it is likely the RERRA will need to coordinate with the EDC regardless. The OMS DER WG suggests MISO explore moving the "RERRA double counting check" or further explain its reasoning for its current placement. We would also like to note that the RERRA placement may also depend on what is covered in the LBA (which should be the LSE?) double counting check and the level of interaction between the LBA/LSE and RERRA at that stage.