

DERTF: “Aggregation Size Requirements” (IR070) (20210412)

During the April 12, 2021 Distributed Energy Resources Task Force (DERTF) meeting, MISO discussed the maximum DER size within aggregation. Stakeholder feedback is requested on the maximum DER size to participate in an aggregation and the maximum DER aggregation.

<https://www.misoenergy.org/stakeholder-engagement/stakeholder-feedback/dertf-aggregation-size-requirements-ir070-20210412/>

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The Organization of MISO States’ Distributed Energy Resources Working Group (OMS DERWG) appreciates the opportunity to submit the following comments. This feedback does not represent the position of the OMS Board of Directors.

The workgroup understands that large resources on the distribution system have the potential to cause system reliability issues, incur large system upgrade costs, or trigger adjacent-distribution system or larger bulk system-affected system studies. Most states have some level of state-based interconnection processes or requirements which are used to assess what cost are reasonable, the speed at which resources are interconnected, or the studies that are required to be evaluated before interconnection. States have established these processes to ensure that the state-regulated distribution system and these resources, their costs, and system effects are reasonable and in line with reasonable ratepayer costs, a reliable system, and individual state policy. That being said, the OMS DER WG does not believe that MISO needs to institute a cap on either DER or DERas at this time due to these state processes and current oversight.

While the OMS DERWG appreciates MISO’s proposal to defer to the EDCs and states to “identify system impacts or limits due to size”, the DERWG would be willing to consider reasonable proposals for why an individual maximum size limitation may be appropriate, if there are reasons why a state-based review or interconnection process is not sufficient, or there are RTO/ISO needs for metering, verification, or settlement requirements for a larger DERs.

Additionally, from a market access standpoint, large individual DERs would be able to participate in MISO markets as a DERa consisting of a single DER. Large DERs would likely represent sophisticated customers and may not need to be bundled with other DERs to access wholesale revenue streams. OMS DER WG also acknowledges that while the voltage of the distribution line and the maximum size of an individual DER are likely correlated, connection of a very large DER (20MW+) for the purpose of DER aggregation is likely not feasible without substantial system upgrades for that new resource. While the OMS DERWG currently supports MISO’s proposal to not set a maximum size for DERas, if MISO decides to modify this proposal in the future, the OMS DER WG would like to see an analysis of the merits of various individual size limitations, in order to align with QF rules and DER conversations occurring in other RTOs.

In response to MISO’s second question, OMS does not recommend a limit on the maximum size of a DER aggregation, assuming the scope of DER aggregation is limited to a single EP node as proposed.