

DER TF Compliance Iteration 1 Feedback Request - Due June 28

[DERTF: Filing Framework Document – Iteration 1 \(IR070\) \(20210607\) \(misoenergy.org\)](#)

During the June 7, 2021 Distributed Energy Resources Task Force (DERTF) meeting, MISO presented Iteration 1 of FERC Order 2222 Filing Framework. Stakeholder feedback is requested on Filing Framework Document, DERa Resource Modeling, Settlements and dual participation. Focus should be on the following questions:

- How can the filing framework documentation be improved?

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.

MSE Connection and Other Software Limitations

The OMS DER WG noted that additional transparency on how the Order 2222 compliance framework will be affected by, or will be advanced, in light of the Market System Enhancement timeline and in relation to the Order 841/ESR product timeline will be a useful addition to Compliance Iteration 2 and discussion at the RERRA workshop and August DER TF.

It would be useful for stakeholders to understand the MISO timeline for when certain MSE capabilities would be possible, what the timeline for Order 2222 compliance looks like, whether there will be a transition period or timing, what matters or issues are reliant on the MSE roll-out or whether they will be utilizing the legacy system.

Additionally, beyond the MSE, there was an ask at a previous DER TF for an overview of MISO software (including MSE but also other potential software or system limitations) and what those limitations are in relation to Order 2222. This OMS DER WG believe this discussion is important to understanding while we discuss Order 2222 methods to product development to understand what are the current and future bounds of MISO's system. Additionally, points to address would be whether, and who, are working on further development of those software or system limitations, what is driving the development, and if possible, understanding of the timeline for the research and outcomes.

Iterative Order 2222 Tariff Development – Post April 2022

As it has been discussed, there are likely going to be improvement needed either from technological advancements, advanced market software, or other changes – and as acknowledged by FERC. The OMS DER WG would like to hear MISO discuss how it may address a change management and 'relook' at Order 2222 compliance in a conscientious manner (and likely) independent of the IR process post-April 2022 - and how that discussion and timeline may be built in as a feature of the Order 2222 compliance filing. The OMS DER WG has concerns that MISO funding or IT barriers will restrict future improvements of the Order 2222-tariff, and

therefore, may limit its success. It is known that this filing is leading tech, and that we expect there to be significant change (both in our understanding, how we utilize the market products) and therefore a proactive plan to revisit the compliance framework in the future should be a built-in feature of compliance.

Connection to MISO Hybrid Work and Workshops

The OMS DER WG sees multiple areas of overlap between the DER TF and the on-going hybrid resource work. The OMS DER WG wants to ensure that any similarities, connections, or streamlining of resource and product development be mimicked wherever possible to ensure efficient and less complex solutions (and market products).

Roles and Responsibilities

The OMS DER WG sees the MISO slide defining potential stakeholder or industry sectors as needing discussion and improvement. MISO should consider stakeholder input on how to define these roles and responsibilities; this may be an area where stakeholders bring to the table their proposed definition and roles within the process for collective DER TF input. Additionally, the OMS DER WG wants to ensure that any roles or responsibilities that are defined in an Order 2222 compliance be vetted by that stakeholder sector and be as minimal as possible.

Interconnection Process

The OMS DER WG is appreciative of the work underway in the Interconnection Process WG on the process for DERs to be evaluated and the timing and quarterly review process MISO has proposed. The OMS DER WG recommends MISO ensure that a similar and transparent process also be developed for DERs and affected system studies (not just DERs).

Use of Single EPNode

As noted in previous comments, the OMS DER WG understands that use of the EPNode may be reasonable for the first iteration of compliance, but MISO should consider if there are varying aggregation levels that could be used for different market products. Additionally, MISO should continue to evaluate and research solutions to obtain a broader than EPNode aggregation geographic scope. OMS DER WG continues to support its earlier comments, and seeks MISO to return with periodic updates on the progress and needs to support a broader than EPNode options, even post-Order 2222 compliance filing.

Metering and Telemetry

The OMS DER WG find the metering and telemetry issue to be complex and will require considerable stakeholder discussion. As FERC seeks, M&T requirements should rely on distribution or utility metering requirements where ever possible. As MISO is aware, those

requirements could vary by program, utility, or state. MISO should delineate what are the base needs for metering and telemetry so that state regulators and utilities can consider wholesale M&T needs in future decisions and approvals.

- Should a DERA submit aggregated meter data or individual DER meter data for performance tracking? Why?

M&T requirements should be as minimal as possible, providing MISO with the data it needs for registration, operations, and settlements etc. but avoiding undue burdens. As such, available or existing M&T systems should be used where ever possible.

As to other questions posed by MISO, the OMS DER WG may provide further comments or input following review of other stakeholder comments.