

[DERTF: Task Force Sunset Provision \(IR070\) \(20220113\)01/24/2022](#)

During the January 13, 2022 Distributed Energy Resources Task Force (DERTF) meeting, MISO discussed its proposal to proceed with the Task Force sunset date as written in the Charter approved by the Steering Committee in May 2021. Stakeholders are invited to provide comments with focus on the following questions:

1. Should the DER conversation continue at a stand-alone entity at MISO?
2. For what explicit reasons should a *stakeholder entity* continue?
3. What topics should be covered, what's left from O2222, what's on-going from O2222, what other issues should be addressed?
4. If sought, what format the group should take (TF, WG, or is the proposal from MISO - in that topics are dispersed to other subcommittees or task teams appropriate)?
5. What timing aspects should be considered?

The Organization of MISO States Distributed Energy Resources Workgroup (OMS DER WG) is appreciative of MISO accepting comments on this issue. The OMS DER WG first wanted to express its support for following the governance guide and established procedures for review and discussion surrounding the future of the MISO DER Task Force (DER TF).

1. Should the DER conversation continue at a stand-alone entity at MISO?

The OMS DER WG supports the continuation of a stakeholder entity in some form. The OMS DER WG is open to ideas to creatively solve this unique multi-faceted, multi-stakeholder, and multi-committee set of issues.

Due to the on-going and evolving nature of these topics related to DER-integration, and the overlapping jurisdictional, and multi-stakeholder coordination needs, MISO should continue to provide a one-stop shop for information, communication, and understanding of these issues. At a minimum MISO should provide clear guidance or a process map for where DER-related issues can be brought and where they can be discussed in a timely manner once identified. If the DERTF is sunset MISO should retain existing tools to foster this request – including the DER TF stakeholder email list. Using the Integrated Roadmap (or future IR-like replacement) as the ‘home’, even if on a rolling and more frequently revisited basis, will not be sufficient. It is known today, and has been repeatedly acknowledged in the DER TF discussions, that changes or further work on the DER-aggregation market product is will be needed. The issues we will face will need more timely action and attention than sunseting of the DERTF will afford.

The OMS DER WG finds this comment period to be a useful first step for stakeholders to better understand each other's position on this issue, so that if needed - as the original proposers of the DER Charter and DER TF envisioned - the OMS, and other stakeholders, can have

discussions and propose solutions to issues as they arise at MISO (or elsewhere). Continuation of a group in some manner is consistent with other RTOs; e.g. PJM's compliance filing is due 2/1/2022 and their Subcommittee will continue to meet as early as 2/25/2022 to discuss their parking lot items. PJM currently has meetings scheduled through June 2022.

This has been a longstanding issue, one of joint importance to MISO and OMS. OMS has established DER's as a strategic priority again in 2022 and continues to support the [OMS-MISO Joint Priorities Statement](#).

The OMS DER WG is interested in hearing from other sectors on this issue to better understand whether the OMS DER WG's needs are similar to other sectors.

2. For what explicit reasons should a *stakeholder entity* continue?

Including the reasons discussed above, the OMS DER WG believes that some heightened plan for continued DER-topics is needed to ensure coordination, communication, and visibility into cross-jurisdictional, multi-sector DER-issues. The OMS DER WG acknowledges that DER-issues are unique in that they involve participants that are not routinely following other MISO subcommittees. Therefore, stakeholders will need additional help identifying where DER-related work is taking place at MISO so that they can maintain a holistic view of MISO's progress. It will be particularly difficult to ensure robust participation from all relevant stakeholders as many relevant stakeholders are not routine MISO-stakeholder process participants.

MISO at a Logical Intersection for this work: As MISO is at the intersection of these issues, it makes sense that this forum should be at MISO. A forum at MISO is the only means to integrate these conversations into wholesale products, planning, and coordination frameworks, and a cross-sector stakeholder group is already established, at least for some of the conversations that need to be further developed. The OMS DER WG acknowledges this despite the fact that MISO and stakeholders will need to share the responsibility of driving future work in this area.

Effective Integration of DERs: Ensuring DERs are effectively integrated into MISO processes and products and considered at the wholesale level is important to retail regulators as they strive to ensure these resources' use and value is maximized at the retail level. Both MISO and retail regulators will have to work together to ensure these system resources are properly accounted for. The MISO stakeholder forum is needed to ensure that occurs.

The OMS DER WG continues to believe that in ensuring the success of the DER-aggregation product, it is important that distribution and wholesale system options and resources are both optimized where they interoperate and are fully utilized. This evaluation of the DER-A market product and DER-issues will be an iterative need, not one that stops at MISO submittal of a FERC-Order 2222 Compliance Filing. There are ongoing issues related to DERs and their effects

on energy and resource adequacy, reliability, and interconnection that need further discussion and heightened visibility and involvement from stakeholders.

Visibility and Tracking of DER Issues: Having a known one-stop shop at MISO to track and monitor on-going DER issues would be optimal. Issues could arise both within the stakeholder entity, as well as via updates from other subcommittees that may be tackling other DER-adjacent issues. A one-stop shop helps ensure all stakeholders, especially newer entrants having an interest in DER-related issues can be engaged and educated more effectively. States have found it invaluable to have established groups, email lists, and a ready-set list of key personnel to tackle DER-issues as they arise.

Transparency: A MISO stakeholder group would ensure DER discussions continue in a public forum. This is an invaluable benefit MISO provides. While the states will certainly need to evaluate processes, tariffs, rules, etc. outside of this stakeholder group, a standing forum within this existing public forum to discuss a host of on-going, future, and yet to be known, DER issues would greatly inform state level activities and ensure effective alignment to RTO processes.

Prior to the DER TF, considerable coordination efforts and discussion occurred on these issues (work that began in 2017 and resulted in OMS and MISO's Joint Priorities), and the OMS DER WG found those conversations robust and useful. The OMS DER WG finds these long-standing issues outlined and discussed between MISO and OMS as key areas that will grow in importance if they are to be implemented well. These issues need to continue to involve an appropriate set of stakeholders in the MISO footprint. The issues flagged and discussed between OMS and MISO will not go away with the filing of the Order 2222 Compliance Filing.

Keeping DER Prioritized: DER-issues will only grow in importance and impact, both as a resource to be utilized for system reliability and flexibility, as well as incur issues and unforeseen implications to existing market products, MISO processes, and system needs.

Dispersing the task force may have the unintended consequence of diminishing the importance of DERs to both the state and wholesale system, having the opposite effect of what FERC intended with Order 2222.

Point of Coordination for Order 2222: In addition, a forum dedicated to DER issues could serve as a component of the coordination requirements included in Order 2222. Aside from the written coordination details that the OMS DER WG assumed will be included in MISO's initial compliance filing, a MISO stakeholder group could function as a place to have ongoing discussions among all the parties that will be involved in coordinating DER aggregation, including RERRAs, EDC, DERAs, and MISO. Over the past year, MISO has consistently framed its initial compliance filing as a first step, with details needing to be worked out in BPMs and through engagement with RERRAs in the years to come. As RERRAs develop new rules and regulations surrounding DER aggregation, a standing stakeholder group to address new and

existing issues and problems will be essential to the success of MISO's Order 2222 compliance and is contemplated by FERC (§ 35.28(g)(12)(ii)(g)).

The OMS DERWG looks forward to the written details of MISO's coordination framework and suggests that the continuation of a DER stakeholder entity as a piece of this framework could be included in MISO's compliance plan which would bolster the quality of MISO's compliance and better meet the needs of its stakeholders than simply sunsetting the DERTF.

3. What topics should be covered, what's left from O2222, what's on-going from O2222, what other issues should be addressed?

OMS foresees that further discussion on the following topics will be needed, particularly as states and EDCs develop rules and processes beyond the scope of MISO's compliance and as pertain to increased penetration of DERs in the future:

- Order 2222:
 - T-D interface
 - Metering data repository
 - How metering and telemetry rules at state level interact with MISO rules
 - How privacy and data security will be handled at MISO
 - Building and testing the automated registration review
 - Periodic discussion and refinement of use cases
 - Accreditation of DEARs as methodology changes
 - Operational coordination
 - Coordination Framework evaluation and improvement
 - MISO's parking lot (slides 142-143 [here](#))
- DER Issues Generally
 - Review ongoing participation of DER resources in the wholesale market and recommend enhancements to ensure transparent, fair, and efficient participation.
 - Ensuring MISO-developed market rules related to DER ensure safety and reliability.
 - Ensuring market rules adhere to all pertinent jurisdictions and respect the Relevant Electric Retail Regulatory Authority (RERRA) requirements.
 - Review ongoing issues related to the requirements and procedures regarding the deployment of non-wholesale DER (including net load impact and inclusion of Module E forecasts).
 - On-going coordination needs for metering and registration of products outside of DERAs'/Order 2222.
 - Order 841 BPM development and coordination.
 - Integration of DER affected system studies and the larger MISO queue.

- Integration of DER/DEAR operations on transmission system planning, modeling, and forecasting activities which will become increasingly important as DER deployment increases.
- Unknown issues that will develop.

4. If sought, what format the group should take (TF, WG, or is the proposal from MISO - in that topics are dispersed to other subcommittees or task teams appropriate?)

The OMS DER WG strongly prefers that the standalone DER task force or work group be maintained, rather than attempting to address DER issues through the various subcommittees.

This approach is appropriate for the DER specific work and problems that the DER group would be asked to solve. By nature, DERs are hosted on the distribution system and, therefore, distribution experts will need to be involved in these discussions. It would be inefficient to ask these experts to sit through and keep track of lengthy subcommittee meetings where DER issues would only account for a portion of the agenda. For example, DERs issues can be expected to develop in resource and energy adequacy, and interconnection, among other areas, all of which would currently be assigned to a different MISO entity and could cause DER issues to take a back seat to other issues discussed at the subcommittee level.

The OMS DERWG recognizes that discussions at the standing MISO subcommittees will certainly have an impact on DER aggregation but suggests that it would be more efficient and effective for these discussions to be summarized for the DERTF in an informational update, instead of spinning off DER issues to various subcommittees. This will allow stakeholders to holistically digest and discuss DER-related issues.

Largely, the organizations that are most-closely tied to DERs and DER-A issues are not tracking all of MISO's subcommittees and would be nearly impossible to monitor all of those subcommittees to remain up to speed on DER-related decisions. At a minimum, MISO should report at least quarterly to the larger stakeholder group on MISO DERA wholesale markets and DER related developments in MISO.

5. What timing aspects should be considered?

While an early FERC Order on compliance would be ideal there are topics that could be continued and discussed in the interim, while FERC evaluates MISO's filing. The DER TF should be flexible to accommodate meetings as necessary long-term, but likely to be on a less-than monthly basis (potentially quarterly, and as needed). As many stakeholders have noted, it is much easier to cancel a meeting than to schedule one. The frequency of meetings may again increase during the lead up to MISO's launch of Order 2222 market offerings in order to address any changes that will inevitably occur over the coming years, as well as providing updates on Market System Enhancement activities that affect DER/DEAR stakeholders.

If the DERTF is not sunset, the OMS DER respects that many of the issues that need further discussion and work cannot be MISO-led, and instead, stakeholder-to-stakeholder coordination is needed to make progress. If a stakeholder forum is continued, the OMS DER WG stresses that these meetings will need increased stakeholder presentations and involvement to progress.