

**Organization of MISO States
Resources Work Group
Response to RASC Feedback Request of August 24, 2022
Submitted on September 7, 2022**

During the August 24, 2022 meeting of the Resource Adequacy Subcommittee (RASC), MISO presented proposed accreditation reforms for non-thermal resources. Stakeholders were asked to provide feedback on the following:

- Input on MISO's LMR strawman proposal and design specifics presented in Slide 10
- Input on the following for wind and solar accreditation:
 - MISO's recommendation to accredit wind and solar resources based on performance during RA Hours and adjust cumulative unit accreditation to a class capacity value that is derived from a probabilistic method
 - Design considerations and recommendations presented in Slides 28-31
 - Areas of focus for the September 21 workshop

Feedback

The OMS Resources Work Group (OMS RWG) appreciates this opportunity to provide feedback to MISO on the Non-Thermal Accreditation reforms presented to the Resource Adequacy Subcommittee at its August 24, 2022 meeting.

LMR Strawman Proposal and Design Specifics

The OMS RWG believes that MISO needs to tighten up reporting expectations for LMRs before it would be appropriate to focus on the Demand Side Resource Interface (DSRI) to assess actual resource availability. Several stakeholders have provided examples indicating LMRs might not be reporting full availability, including where availability is listed as 0 when below the fixed load level of the resource. Without fully understanding how LMR owners are reporting availability, it would not be appropriate to compare availability in the DSRI to what clears in the PRA as this is not an apples-to-apples comparison.

Additionally, the OMS RWG disagrees with the approach of expanding the number of hours used for determining the accreditation of LMRs. Under the current design, LMRs can only be deployed during Max Gen Events. Unless this is changed such that LMRs can be called upon sooner, LMR availability during non-Event RA Hours is far less important than availability during Max Gen Events.

The OMS RWG believes that the discussion on aligning LMR accreditation with attributes needed during emergency events should be deferred to the broader resource attribute discussion that the Steering Committee recently assigned to the RASC. Recent LMR changes already emphasize the importance of notification times by reducing the accreditation for LMRs with notification lead-times of greater than six hours.

The OMS RWG supports the MISO proposal to require improved and specific locational information for each LMR during the qualification/registration process.

Lastly, the OMS RWG strongly encourages MISO to allow sufficient preparation time for relevant retail tariffs to be adjusted to accommodate changes to LMR accreditation and/or performance expectations before they become effective.

Wind and Solar Accreditation

At this time, the OMS RWG will not comment on the design considerations and MISO recommendations presented at the August RASC meeting but will instead focus on the areas we believe would be valuable for the September 21st workshop on non-thermal accreditation.

The OMS RWG requests that the following topics be included in the September workshop discussion:

- Provide plant-level accreditation examples demonstrating how MISO’s proposed methodology would work:
 - Within this example, information on potential year-to-year plant-level volatility would be beneficial.
- The following information would help us better understand how the ELCC-adjusted by RA hours approach would be implemented:
 - A step-by-step calculation on how the Marginal vs. Average-ELCC would be implemented at the *class level*.
 - A step-by-step calculation on how the consideration of Schedule 53 at the *unit level* would consider Seasonal RA Hours and Annual RA Hours.
- Regional diversity within the ELCC of each resource class:
 - Would it be possible to establish separate classes for wind and solar resources based on which subregion the generation facilities are located? (ex. Solar-North/Central and Solar-South as separate classes)
 - Would it be possible to establish a more granular geographical focus per resource type? The influence of weather on risk events can dramatically vary within zones. A more granular focus on weather-related events could reflect a more accurate representation of each resource’s ELCC.
 - How would separating by subregion impact the portfolio effects?
- Will the proposed methodology be able to include energy-limited resources as sufficient data becomes available in the future?
- Within the list of options for consideration on how many historical ELCC values should factor into accreditation, MISO mentions the possibility of using simulated data to generate unique ELCC values for the prompt year. Can this be further explored?
 - More information on how MISO envisions this concept working should be provided at the workshop.
 - It may be helpful for MISO to either:
 - (a) “back-cast” by using their simulation to develop numbers for a prior year and then compare those simulations to actuals; or
 - (b) consider developing these forecasts for a few years and compare forecasts vs. actuals to transparently show the differences and fine-tune the approach before implementation.

- MISO is considering adding non-thermal resources to Schedule 53 resources. The OMS RWG would like to know more about potential changes that would be implemented by including non-thermal resources under the class-level categorization of Schedule 53. This includes but should not be limited to:
 - How will non-thermal resources be categorized under the Tier 1 and Tier 2 classes?
 - Will the number of seasonal RA Hours evaluated be 65? If not, how many?
 - For resources with less than 65 seasonal RA Hours, how will the operating margin threshold be calculated and implemented to determine the next tight-margin hours?
 - For resources with a seasonal RA Hour deficiency, what number of annual RA Hours will be considered? (currently 260 Annual RA Hours per each of the three study years)
 - The Alberta Electric System Operator (AESO) reported a potential scarcity risk when utilizing 250 Annual Hours by which certain years' performance were miscalculated. AESO concluded that the top 1,250 tight-margin hours would better represent the performance for the period under consideration. In their case, a five-year period was considered. We suggest that the top 780 tight-margin hours may be a better representation for the Annual RA Hours.
 - [\(Capacity Resource Accreditation for New England's Clean Energy Transition, by The Battle Group\)](#)

The third question asks, "How many historical ELCC values should factor into the accreditation for the prompt year?"

- In terms of historical ELCC values, some states see value in shifting towards a 10- to 13-year period rather than a 17-year period to better reflect recent weather risk events and updated fleet information.
- At the RASC meeting, an option was presented that would give higher weighting to recent years. How would the weighting be determined?

This feedback is from an OMS work group and does not represent a position of the OMS Board of Directors.