Organization of MISO States
Distributed Energy Resources &
Transmission Planning Work Groups
Response to June 21, 2023 PSC Feedback Request
Submitted on July 17, 2023

Following the June 21, 2023 Planning Subcommittee (PSC) meeting, MISO proposed several principles to advance DER data exchange. MISO requested stakeholder feedback on MISO's proposed approach, with particular focus on the following:

- MISO's general principles for viewing DER data exchange refinements.
- MISO's draft framework for considering phasing in more DER data exchange along with any suggested improvement to the general approach.

https://www.misoenergy.org/stakeholder-engagement/stakeholder-feedback/2023/psc-proposed-approach-for-advancing-der-modeling-data-exchanges-20230621/

The OMS Distributed Energy Resources and Transmission Planning Work Groups (OMS DER & TP Work Groups) appreciate MISO's work on DER modeling and data exchange and appreciate this opportunity to provide feedback. **This feedback is from an OMS work group and does not represent a position of the OMS Board of Directors.**

The OMS DER & TP Work Groups offer the following feedback:

1) The OMS DER & TP Work Groups appreciate MISO raising these DER modeling and data exchange issues to the Planning Subcommittee. However, we request that MISO also introduce these issues at a future DER Task Force (DERTF) meeting so that distribution experts can offer their perspectives. As stated elsewhere, these experts do not typically attend MISO meetings outside the DERTF. If MISO wishes to work with distribution level personnel on these or other items, it would be best to present this material at the DERTF to ensure they are informed of MISO's intentions, which could impact their day-to-day work.

   However, this feedback request closes on July 17 before the next DERTF is scheduled for July 27. As such, the OMS DER & TP Work Groups recommend that MISO provide an informational update on these issues at the DERTF and direct stakeholder attention to this PSC feedback request to avoid overlap. In the future, if MISO intends to continue to raise DER issues in forums other than the DERTF, it may be best for MISO to coordinate updates with the DERTF leadership and management plan to ensure distribution experts are able to participate in a timely manner.

2) The OMS DER & TP Work Groups encourage MISO to consider whether the CUS DER Registry presented at the April DERTF is an appropriate and useful tool for solving this and other information and data sharing problems associated with DERs and Order No. 2222 compliance.

3) The OMS DER & TP Work Groups encourage MISO to continue to coordinate with distribution-level entities and state regulators to access the data it needs. The Work Groups acknowledge the need to improve DER modeling, particularly as DER penetration increases, and it is evident that distribution-level utilities are best positioned to provide the necessary information to MISO. This is especially true of the granular level of information that MISO is seeking here.

   To the extent that steady state and dynamic data is unavailable for every individual DER or excessive for MISO modeling purposes, it may be useful to think through how such data may be aggregated at the distribution/transmission interface.

   MISO will need to rely on distribution utilities to aggregate the information they have collected through DER interconnections and other processes and make that information digestible and useful for MISO modeling purposes.