Organization of MISO States (OMS)
Resources Work Group
Response to July 12, 2023 RASC Feedback Request
Submitted on July 28, 2023

During the July 12, 2023 meeting of the Resource Adequacy Subcommittee (RASC), MISO presented an updated accreditation proposal for stakeholder feedback. MISO requested formal feedback, due July 28, on the following items:

- Direct-LOL results by resource class
- Initial design proposal
- Co-located and single offer hybrid proposal
- Planning Reserve Margin Requirement and LSE obligation

https://www.misoenergy.org/stakeholder-engagement/stakeholder-feedback/2023/rasc-accreditation-reform-rasc-2020-4-2019-2-20230711-12/

The OMS Resources Work Group (OMS RWG) appreciates the opportunity to provide feedback to MISO on its most recent update on the Direct-Loss of Load (Direct-LOL) accreditation proposal. **This feedback is from an OMS work group and does not represent a position of the OMS Board of Directors.**

Direct-LOL Results by Resource Class

MISO's posted Direct-LOL results based on the current Planning Year data provide a benchmark to show what the impact of the proposed change would be on the existing resource fleet and mix. However, to fully understand the implications of this new accreditation methodology, we need additional data and results with various changes in the resource mix. MISO must provide Direct-LOL results for the resource mix during several years in Future 2A, as this is the future used for transmission planning. We understand that Astrape will use its own forward-looking energy growth scenario based on the existing resources of Planning Year 2023-24; however, it is important for this scenario to closely align with the one that stakeholders are most familiar. It is critical to state resource planning to understand how MISO's proposed Direct-LOL resource accreditation will change capacity values over time.

Initial Design Proposal

On the Design Elements listed on Slide 7 (Hour Selection, Direct-LOL calculation, and Resource Classes), MISO should consider the other potential options MISO has listed. For example, there is resource adequacy value in availability during hours with an extremely tight reserve margin (such as those that would prompt MISO going into Energy Emergency Alert conditions). Resource class granularity, such as more location-based (i.e., local resource zones) or with technology differentiation within a fuel category (ex. Gas CC vs CT and solar fixed panel vs solar tracking panel) would provide meaningful value. The OMS RWG requests that, at a minimum, MISO justify why its initial proposal is preferred to other potential options.

Co-located and single offer hybrid proposal

MISO should provide a model and resource class for the most prevalent hybrid combination in the queue – solar with storage. The OMS RWG understands that co-located and hybrid resources are being evaluated based on their point of interconnection (POI), but this needs further discussion and clarification. Co-located or hybrid resources could be broken into more classes based on the ratio of solar MWs to storage MWs, once more performance data from these resources is available.

Planning Reserve Margin Requirement and LSE obligations

Going forward, MISO should include UCAP accreditation and PRMR values when listing out Direct-LOL resource class accreditation and PRMR (Slide 16 of the presentation). Providing the UCAP and Direct-LOL results for the resource classes and the PRMR changes, side by side, will help determine the impact of the proposed change and the relative impact to each resource class.