Organization of MISO States (OMS)
Resources Work Group
Response to July 12, 2023 RASC Feedback Request
Submitted on August 18, 2023

At the August 8, 2023 special meeting of the Resource Adequacy Subcommittee (RASC), presenters discussed MISO's proposal on Reliability-Based Demand Curve (RBDC) opt-out provisions and the RBDC Opt-Out Adder (X%). Feedback was requested on the proposed RBDC Opt-Out Adder provisions and the accompanying draft Tariff language (Section 69.A.1).

https://www.misoenergy.org/stakeholder-engagement/stakeholder-feedback/2023/rasc-proposed-rbdc-opt-out-adder-and-draft-tariff-rasc-2019-8-20230808/

The OMS Resources Work Group (OMS RWG) provides this feedback to MISO on its most recent update on the Reliability Based Demand Curve (RBDC) proposal. **This feedback is from an OMS work group and does <u>not</u> represent a position of the OMS Board of Directors.**

The OMS RWG encourages MISO to formalize its plan to evaluate and implement a more robust methodology for its annual calculation of the X% adder for entities selecting the RBDC opt-out. While a simpler approach that relies on historic information to determine X% may be acceptable as an interim step during initial implementation, a forward-looking or prospective approach may be needed to better ensure comparability between those that utilize the RBDC opt-out and those that participate in the PRA.