Organization of MISO States (OMS)
Resources and DER Work Groups
Response to November 7-8, 2023 RASC Feedback Request
Submitted on November 28, 2023

In the November 7-8, 2023, meeting of the Resource Adequacy Subcommittee (RASC), MISO continued discussing accreditation reforms for Load Modifying Resources (LMRs). Stakeholders were invited to submit feedback on the proposed approach for near-term changes from the RASC presentation.

https://www.misoenergy.org/stakeholder-engagement/stakeholder-feedback/2023/rasc-lmr-accreditation-near-term-changes-rasc-2019-9-20231107-08/

The OMS Resources Work Group (RWG) and Distributed Energy Resources Work Group (DERWG) provide this feedback to MISO on its proposed near-term changes to LMR accreditation. **This feedback is from an OMS work group and does not represent a position of the OMS Board of Directors.**

Locational Requirements

The RWG and DERWG support MISO's proposal to require EPNodes instead of zip codes when registering an LMR. The work groups agree that identifying LMRs by EPNodes will support system reliability by providing more accurate LMR locational information during emergencies and will better inform congestion management decisions. However, this requirement will likely increase the workload of EDCs to identify those nodes for aggregators. This trend of increasing work for EDCs will continue under Order No. 2222 as well, likely requiring them to hire more staff and/or further automate their processes.

The work groups recognize that the data asymmetries presented by this requirement may introduce a barrier to market entry since the majority of LMRs registered with MISO are part of an EDC program and the EDC is the entity with the EPNode data.

Automation

The RWG and DERWG encourage MISO and stakeholders to explore opportunities to automate LMR registration processes to handle increased levels of demand response, which may be applicable to DERs as well. The work groups note that automation of MISO and EDC processes will be essential to fully realize the benefits of DERs and ensure security of customer information.

Availability

The RWG and DERWG emphasize that updates to MISO's Demand-Side Resource Interface (DSRI) tool are overdue. If adequately updated, however, the DSRI tool could be utilized to track and provide availability-based data for purposes of LMR accreditation.

Still, LMR owners should be updating the DSRI tool regardless of changes to LMR accreditation. Not accurately reflecting LMR availability was a primary factor in the substantial underperformance issues experienced in previous events and needs to be corrected.

Notification

MISO's proposed adjustments to accreditation based on notification time may be reasonable. The RWG and DERWG encourage MISO to support the values in the sliding scale below with data linked to the actual operational reliability they provide. Furthermore, it would be helpful to evaluate the notice requirements and relative performance on a seasonal basis. This could be accomplished by conducting a historical analysis of the number of emergency situations that were knowable in advance within the given notification times below. LMR accreditation should be directly linked to the value that each block of notification times provides.

The work groups believe MISO's proposed sliding scale based on notification time may be reasonable but needs to be supported by data as described above:

- 0 to 2 hours = 100%
- 2 to 4 hours = 70%
- 4 to 6 hours = 50%

The work groups recognize that longer-lead time LMRs may face more physical or economic limitations than short-lead time resources and that decreasing their accreditation may render them uneconomic and therefore, less willing to offer into the PRA as an LMR product.

Auditability of Data on LMR Availability

The OMS RWG and DERWG support enhanced verification to ensure LMRs are documenting their availability appropriately. However, it may be overly burdensome to require LMRs to obtain meter data for each Capacity Advisory that MISO declares. This scenario would likely create additional work each year as those events occur relatively often and seem to be increasing.

The work groups request that MISO provide data on the number of Capacity Advisories that have been called in recent years. This data should also include a breakdown of the times where MISO called for a higher level in the Emergency Procedures, such as Max Gen Alert and Max Gen Warning. The data might show that a higher level in the Emergency Procedures (such as a Max Gen Alert, Warning, etc.) would be more appropriate and achieve the desired result.