Organization of MISO States (OMS)
Distributed Energy Resources and Markets Work Groups
Response to February 19, 2026 MSC Feedback Request
Submitted on March 5, 2026

In the February 19, 2026 meeting of the Market Subcommittee (MSC), stakeholders were invited to submit feedback on **Meter Accuracy Standards for Small Aggregated Assets**, including the following specific questions:

- Do you understand the market benefits of revised meter accuracy standards? What else needs to be considered?
- Which of the redlines proposals do you prefer? Are there alternatives not yet considered?

https://www.misoenergy.org/engage/stakeholder-feedback/2026/msc-meter-accuracy-standards-for-small-aggregated-assets-msc-2025-7-20260219/

The OMS Distributed Energy Resources and Markets Work Groups (OMS Work Group) provides this feedback to MISO regarding Voltus' proposed meter accuracy standards. **This feedback is from OMS work groups and does not represent a position of the OMS Board of Directors.**

1. **Do you understand the market benefits of revised meter accuracy standards? What else needs to be considered?**

The OMS Work Groups understand greater participation of smaller DER assets in MISO's markets may extend economic and reliability benefits, particularly at the residential level. By revising meter accuracy standards, markets can leverage greater DER capacity by lowering barriers to entry. Expanded use cases for these assets may provide a greater return on investment for owners if they are able to integrate into wholesale markets. However, the OMS Work Groups understand that the realization of potential benefits of revised standards is dependent on a sufficiently large aggregation of small assets and validation of the accuracy of meter data.

The OMS Work Groups have a few priorities and recommendations for changing meter accuracy standards for small aggregated assets, below:

- It is important to have both transparency and analysis around determining what qualifies as a sufficiently large aggregation of small assets to ensure measurement errors are corrected through the law of large numbers. To the extent that small aggregated assets can provide benefits in MISO's capacity and energy markets, those benefits are dependent on the aggregation being sufficiently large. Prohibitive metering requirements could restrict aggregation sizes thereby limiting DER participation in MISO's markets. However, if the rule of large numbers applies in this scenario, the OMS Work Groups would like to hear from MISO staff about their comfort level verifying an aggregation size to meet this threshold.

- As the adoption of DERs within MISO increases and more creative avenues for participation in MISO expand, the OMS Work Groups raise concern over the risk of gaming meter accuracy to undermine the integrity of MISO's markets. An optimal revision to meter accuracy standards will maximize participation of small aggregated assets in wholesale markets while preserving the same amount of verification and consumer protection that exists under current standards.

- If changes to meter accuracy standards make demand response, and later, DERs, more accessible to residential customers, will this necessitate additional changes at MISO to streamline verification processes for DERs between ARCs, LSEs, and RERRAs?

2. **Which of the redlines proposals do you prefer? Are there alternatives not yet considered?**

At this time, the OMS Work Groups are not ready to endorse either set of redlines offered by Voltus. Stakeholders may benefit from more sophisticated modeling by Voltus and MISO, as well as input from technical experts on metering, to better assess the proposed redlines and consider alternative redlines, if necessary.