Organization of MISO States (OMS)
Resources Work Group
NERC Energy Reliability Assessment Standard Development
Submitted on April 15, 2026

Based on comments received by NERC regarding the draft standard for Project 2024-02 Planning Energy Assurance, an in-person workshop, and Drafting Team meetings, the Drafting Team has revised the proposed NERC standard. The standard now has a new family name: Energy Reliability Assessment, ERA-001-1.

This standard is designed to require planning, situational awareness, and identification and communications of risks while reinforcing state authority. Many of the revisions reduce ambiguity and provide more clarity to the requirements. Importantly, the mitigation action requirement was overhauled and now requires entities to develop "mitigating action(s)." The Drafting Team believes that this approach provides more flexibility to entities in determining appropriate actions that will vary across regions.

https://www.nerc.com/standards/reliability-standards-under-development/2024-02-planning-energy-assurance

The OMS Resources Work Group (RWG) provides this feedback to NERC and the Drafting Team regarding the development of an Energy Reliability Assessment standard. **This feedback is from an OMS work group and does not represent a position of the OMS Board of Directors.**

The RWG appreciates the NERC Drafting Team's continued solicitation of stakeholder feedback regarding the development of an Energy Reliability Assessment standard (formerly, Planning Energy Assurance) and appreciates the modifications made to date. The RWG provides the following feedback to the Drafting Team's questions:

1. **The Drafting Team is looking for examples to include in the Technical Rationale that will support the standard requirements and help guide industry when conducting energy assessments and developing mitigation actions. What are some examples of potential mitigation actions in the planning horizon (not the operational horizon) that can be taken by the Transmission Planner or Resource Planner?**

   The revised standard's incorporation of *mitigating actions* in lieu of *Corrective Action Plans* still appears to drive procurement and demand-side decisions that would interfere with state authority. In the context of this standard's objectives, examples of mitigating actions (e.g., resource development, demand-side programs, and long-term resource adequacy actions) would likely infringe on responsibilities that fall primarily within the purview of state regulators and Load Serving Entities (LSEs), not the Bulk Electric System reliability authority delegated to NERC. If the Drafting Team is requesting examples to support a standard that extends beyond NERC's jurisdiction or duplicates existing authorities, we do not believe it is appropriate to develop detailed Technical Rationale in support of those requirements.

   To aid in discussion, the RWG provides these additional considerations. As a mitigating action, Resource Planners can choose not to accept new firm load additions or to implement Demand Response for existing load. However, these options likely require approval by a state regulatory authority, and some state laws may obligate LSEs to serve new loads. Otherwise, Resource

Planners do not have many mitigating actions they can take in the planning horizon without building new generation capacity.

A Transmission Planner's mitigating action could include updating Local Planning Criteria, which could then require transmission projects to be built. However, this example provides an indirect pathway around the statement in R6.1 that construction cannot be a mitigation action.

Notably, existing state laws and regulations already require franchise LSEs to provide reliable service at a standard established or approved by regulators. To meet these standards, rigorous demonstrations of need and considerations of alternative solutions (including load management options) are required.

2. Based on your comments submitted during the initial ballot, do the revisions address your feedback? Why or why not?

The RWG appreciates the Drafting Team's decision to revise the *Corrective Action Plan* requirement with *mitigating action*. To fully understand the import of this revision, the RWG requests that the Drafting Team provide a definition for mitigating action and an explanation for how it will be enforced. Our understanding is that examples of mitigating actions will be provided in the Technical Rationale, and enforcement will be limited to ensuring that communications occurred.[1]

As drafted, it is unclear whether the mitigating actions in the standard implies the development of a formal *mitigation plan*. While the NERC Glossary does not define mitigating or mitigation action, ReliabilityFirst defines a *mitigation plan* as "an action plan developed by the registered entity and submitted to ReliabilityFirst to: (1) correct a noncompliance with a NERC Reliability Standard; and (2) prevent its reoccurrence." This distinction is important and should be clarified.

The limits of enforcement should also be explicitly defined. It appears that compliance intends only to be procedural – i.e., whether a study was conducted and whether appropriate notice was provided – rather than outcome-based. This aligns with the standard not establishing a required reliability threshold; however, that intent should be clearly stated.

The Drafting Team's revisions do not address the concern that states oversee their utilities' planning processes broadly by establishing targets and processes to carry out efficient planning to reliably serve their customers. As written, the standard seems to create a new planning process where utilities receive homework from their RTO.

Perhaps the biggest issue that has gone unaddressed is how a Planning Coordinator could reasonably identify who is responsible for developing mitigating actions (essentially connection to non-jurisdictional entities/frameworks). This is especially problematic for the MISO region, whereas it might be more useful in other regions.

[1] While some RWG members believe this is sufficient and a reasonable change, others believe it still goes beyond the scope and jurisdiction of NERC.

Concerns remain that this effort risks distracting from ongoing regional initiatives and diverting resources toward duplicative requirements. Existing market structures, resource adequacy frameworks, and assessments (e.g., NERC's LTRA) already evaluate and address energy adequacy, raising questions about what additional benefit this standard provides and how responsibilities are allocated – particularly for entities without a direct role in resource planning.

Additionally, proposed actions could be out of step with cost causation principles, as a Planning Coordinator may identify risk across a "portion" of the system that extends beyond an individual utility footprint. This creates the potential for a mismatch where a utility could be subject to an enforceable Corrective Action Plan despite not contributing to the underlying risk.

3. **Is there any other feedback that you would like to provide to the Drafting Team that should be considered into the next draft?**

The RWG appreciates the Drafting Team's consideration and incorporation of stakeholder questions and comments in the revised standard.

We believe that in order to develop a valuable, durable, and defensible standard, broader stakeholder and industry engagement is required. To that end, we encourage the Drafting Team and NERC liaisons to consider more broadly publicizing the revised standard and soliciting feedback from a wide range of potentially impacted entities. We look forward to continuing to engage on the development of this standard.