Organization of MISO States (OMS)
Distributed Energy Resources Work Group
Response to May 18, 2026 DERWG Feedback Request
Submitted on June 5, 2026

In the May 18, 2026 meeting of the Distributed Energy Resources Working Group (MISO DERWG), stakeholders were invited to submit feedback on the roles and responsibilities for operational coordination for the relevant entities in the Day-Ahead and Real-Time Markets.

https://www.misoenergy.org/engage/stakeholder-feedback/2026/derwg-roles-and-responsibilities-for-the-relevant-entities-in-the-day-ahead-and-real-time-markets/

The OMS Distributed Energy Resources Work Group (OMS DERWG) provides this feedback to MISO. **This feedback is from an OMS work group and does not represent a position of the OMS Board of Directors.**

The OMS DERWG appreciates MISO's presentation on operational coordination roles and responsibilities and commends MISO for beginning the coordination dialogue now, well ahead of Order 2222 implementation. This lead time is valuable given the number and variety of entities involved and the complexity of the coordination required.

The OMS DERWG offers the following observations:

1. Relevant Electric Retail Regulatory Authorities (RERRAs) are not sufficiently represented in the coordination framework. We appreciate the shaded portion of the first graphic that depicts regulatory responsibilities of the RERRA but note that the shaded portion overlaps multiple arrows subject to the MISO Tariff without providing more detail on the role of RERRAs. MISO's presentation identifies explicit responsibilities for the EDC, DERA, Transmission Owner, Local Balancing Authority, and MISO, but it does not identify roles or communication pathways for the RERRA.

   In a presentation on "Relevant Entities," the OMS DERWG believes RERRAs should be more explicitly acknowledged as they retain significant authority over DER interconnection, operational coordination oversight, and distribution utility dispatch overrides. We recommend that MISO provide more detail on the areas where the RERRAs' oversight role will be required, particularly with respect to EDC dispatch override authority and EDC-DERA coordination protocols. Should MISO find it helpful, the OMS DERWG is willing to review MISO's presentation materials ahead of the posting deadline and provide feedback on any RERRA-related items.

   The OMS DERWG appreciates MISO's caution to not 'assign' responsibilities to the RERRA. Nonetheless, it is appropriate and helpful to call out RERRA roles and responsibilities in the same document as MISO outlines elements it does have direct authority over. A clear delineation between MISO Tariff requirements and RERRA jurisdictional items will help OMS and individual RERRAs fill regulatory gaps and provide additional guidance to RERRA-jurisdictional entities.

2. The communications diagram presents a helpful structure that should be further developed. The framework distinguishes between non-Tariff (orange), one Tariff party (yellow), and both Tariff parties (blue). This is a useful conceptual tool, but without further details, it leaves a lot open to interpretation.

   The OMS DERWG requests that MISO develop this further by explicitly specifying (or at minimum, providing some illustrative examples of or recommendations for) data elements to be communicated along each line and the communication protocols, formats, and timing requirements associated with the data. For example, the presentation states that EDCs will "inform DERA of known distribution system limitations," but does not specify by what time the EDC must communicate distribution system limitations to the DERA or how those limitations will be communicated. Similarly, it would be useful for MISO to provide examples of "known distribution system limitations." Regarding dispatch overrides, MISO should clarify the reporting responsibilities for EDC overrides as well as protocols for communicating overrides to the relevant parties (including, if at all, to the RERRA).

   As MISO proceeds to address these operational coordination issues, the OMS DERWG recommends they present how the Locational Enrollment Service (and other systems) will support these data exchange needs. Also, if some of these communications will only be enabled via RERRA action, it would be helpful and appropriate for MISO to call that out in these presentations. This is partially captured by the orange and yellow lines, but more detail is needed to flesh out which specific communications will be handled by MISO and which will need to be handled by RERRA jurisdictional entities. Again, this delineation will help RERRAs identify specific regulatory guidance and actions needed prior to Order 2222 implementation.

3. **To the extent practicable, roles and responsibilities associated with difficult coordination questions should be delineated now, not at the BPM stage.** The OMS DERWG encourages MISO to continue to engage with RERRAs and EDCs on these operational coordination details, rather than deferring difficult questions to the BPM development phase. States will need time to develop their own rules governing EDC-DERA interactions, dispatch override procedures, and data sharing. These rulemaking processes are most effective when informed by a well-developed MISO framework.