

DERTF: Filing Framework Document – Iteration 2 (IR070) (20210802)

During the August 2, 2021, Distributed Energy Resources Task Force (DERTF) meeting, MISO presented Iteration 2 of FERC Order 2222 Filing Framework. Stakeholder feedback is requested on an issue Parking Lot, scan rates, small utility opt in, and use cases. Focus should be on the following:

- Items captured in the Parking Lot for future additional work on DER/ Demand Response, and coordination topics, and related topics.
- Should scan rates be relaxed for non-regulation qualified, dispatchable resources less than 5 MWs?
- For small utilities opt-ins, MISO seeks general feedback and input on the following questions:
 - What about utilities that may fall above the line in one fiscal year and below the line the next year?
 - Who is responsible for verifying this data?
 - For those utilities which opt-in, over what period of time is that opt-in “authorized”? How does this align with MISO process timelines?
- Suggested use cases that can be transparently evaluated by the DERTF.

<https://www.misoenergy.org/stakeholder-engagement/stakeholder-feedback/dertf-filing-framework-document--iteration-2-ir070-20210802/>

The Organization of MISO States’ Distributed Energy Resources Working Group (OMS DER WG) appreciates the opportunity to submit the following comments. This feedback does not constitute a position of the OMS Board of Directors.

OMS DER WG would suggest continuously clarifying the language MISO uses when discussing DER Aggregators (DERA), DER aggregations (DERa), and “individual DERs”. Based on the discussion on August 2nd, at times it was unclear which variation of DER the presenter was referring to, causing stakeholder confusion and questions.

Slide 68-69 of the Compliance Framework was particularly confusing, as an ‘individual DER’ was interpreted in differing ways by stakeholders and MISO. It is OMS’s understanding that in this instance ‘individual DER’, as clarified by MISO, actually refers to a single DER aggregation (DERa), not an individual water heater, solar panel, or battery. OMS would maintain that it is very important to use precise terminology in future slide decks and looks forward to MISO’s clarification in all discussion between DER, DERa, and sub-aggregations (either resource-specific, DER-sub-aggregations or other sub-aggregation terminology).

Regarding the opt-in and 4 million MW hour considerations, OMS DER WG does not think there needs to be a time permit for the opt-in to be authorized. Any ‘opt-in’ time period and considerations will be evaluated during a RERRA approval for opt-in authorization and any rescission of an RERRA opt-in authorization would need to consider both wholesale and retail considerations (existing participation, registrations, etc.).