



Order No. 2222

Coordination Interviews

MISO-OMS Order 2222
Coordination Conference
February 18, 2025



Organization of MISO States

OMS's View on the Importance of this Topic

- In February 2024, the OMS Board directed staff to work with MISO on Order 2222 implementation issues and to stress the importance of developing a holistic approach to DER data exchange
- OMS staff worked with MISO and interviewed stakeholders to identify current and future problems and to chart potential solutions
- This conference is a direct result of these efforts.
- OMS's 2025 DER-specific projects:

Ensure Order 2222 Enablement	Continue to track FERC's decision on MISO's final Order 2222 compliance filing, and shift focus towards Order 2222 implementation and readiness once that decision is reached.
Lead on a DER Data Registry Effort	Lead efforts to the creation of a formalized DER data collection and sharing process, which may include identification of the proper entities to facilitate such a data exchange.



See [2025 OMS Strategic Priorities](#)

Interviews on DER Wholesale Integration: Purpose

- OMS and MISO have been working together to better understand the information flow and processes needed for efficient DER registration and operation
 - We identified a need for input from key participants in the DR/DER aggregation space
- Conversations were intended to guide us on how to most efficiently prepare for Order 2222 and meet the needs of the various entities involved in aggregation
- Ideas, challenges, and priorities discussed in the stakeholder interviews helped frame the Feb. 18 *Order 2222 Coordination Conference*
- Information gathered from the interviews and this conference will guide OMS's next steps

Interview Questions

- Focused on the information needs to:
 - 1) process DER registrations
 - 2) optimize DER operations
 - 3) information exchange: methods, roles, and responsibilities
- What systems or structures would **best enable coordination** with other DER actors?
 - To brainstorm ideas on where MISO and OMS leadership may be needed

Key Takeaways

1) Need for Centralized, Standardized Method to Share DER Information

- All interviewees highlighted the need for a centralized, standardized method to share registration information
- A paradigm shift is needed to track enrollments, automate workload, standardize data inputs, ensure accuracy, and avoid an inefficient, costly, piecemeal approach

2) Roles and Duties for Each Entity Need to Be Defined

- A clear process needs to be established for both registration and operations
- MISO-regulatory guidance needed here

3) Uncertainty Surrounds Operational Needs and Requirements

- Again, need to define roles and couple with a new information sharing method

Key Takeaway: Centralized Info Sharing

- Several noted a piecemeal approach to coordination in highly inefficient, costly, and administratively burdensome.
 - Suggested role for OMS-MISO: align system standards to avoid 15 different ways of doing things.
- Methods to share information between parties involved in the registration process are not standardized, are not automated, are not scalable – or simply do not exist today
- Order 2222 compliance requires coordination among numerous actors where jurisdictional lines are not always clear.
 - New communication and cooperation structure are going to be necessary for DER aggregations to meet their full potential.

APPENDIX



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MISO's Order 2222 Implementation begins Sept. 2026 – the clock is ticking on Tx-Dx coordination needs.

MISO's proposal to use DRR-Type I to enroll DER-Aggregation in 2026 creates a need to ensure coordination frameworks and systems are operational before implementation.

MISO's Proposed Timeline for Order 2222 Implementation (updated post- FERC Order)

~~Phase 1: DER Aggregations (DER-A) begin enrollment in late 2026~~

- ~~• September 2026 DERAs enrollment using DRR-Type I begins~~
- ~~• DERAs participate in 2027/2028 Planning Resource Auction using DRR-Type I~~
- ~~• Participation in Energy and Operating Reserves Market begins June 1, 2027~~

Phase 2: Full DER-A Participation 2029/2030

- Enrollment begins June 1, 2029 (Moved from October 2029)
- Participation in Energy and Operating Reserves Market begins June 1, 2030
- DERAs participate in 2030/2031 Planning Resource Auction

Key Takeaway: Centralized Info Sharing (cont.)

Needs

- Need a system for enrollment tracking
 - maintain that database with information from each party
 - Would ensure information is accurate, up to date, and we are speaking the same language
- Needs to be automated, with ability to flag data for manual review
- Data needs to be centralized for each party to review
 - Data access, protocols, communication, account #s, registration details, DER types, DER characteristics, etc.
- Need coordination between wholesale and retail levels
 - Need to share real time availability of resources, curtailments, outages, disruptions, etc. (both EDC and DERA need access to this data)
- Would assist EDC-aggregator information streams (this is state jurisdictional)
 - No standardized process for these parties to communicate exists today
 - Either does not exist and/or there is no legal foundation for this interaction
 - There is no existing institutional solution. Today, data is acquired manually, with issues resolved via personal contacts.

Key Takeaway: Centralized Info Sharing (cont.)

Where Does A DER Repository Land?

- National standard?
- LBNL Language Standardization
- State-by-state approach?
- MISO Wholesale for Retail DER?
- NERC Report (Distribution Provider)

Key Takeaway: Defining Roles & Responsibilities

- This will help inform what communication pathways need to be established
 - Determine which inputs each entity will be charged with inputting/validating re: info-sharing
- State jurisdictional entities need guidance to set up their rules/procedures around the MISO mechanisms and tools
- Lack of clear roles and communication streams will cause confusion, which has already occurred in DR aggregation today.
 - This will be even more pronounced with DER registration and operations

Key Takeaway: Operational Needs

- Many unresolved questions → certainty & clear process needed
- Need defined roles, coupled with info sharing method.
- Grey area is EDC-DERA communications. MISO does not have jurisdiction here so this needs to happen organically or via state mechanisms.
 - This has wide ranging impacts: everything from registration to dispute resolution and settlements
- This interacts with utility investments in ADMS-DERMS and the concept of using a Distribution System Operator to handle DER dispatch
 - Need alignment with this retail investment

Open Call for Input and Feedback

- OMS welcomes feedback from the DER Task Force on the topics identified here as well as any other Order 2222 coordination issues.
- We are particularly interested in any lessons learned, best practices, or potential solutions.
- These and related topics were discussed at the Feb. 18 *Order 2222 Coordination Conference* and may help populate the DER Task Force management plan

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