



# LMR Enhancements and Testing Provisions

RASC-2019-9

July 9, 2025

Slide 8 has been updated to correct a minor grammatical error

# Purpose and Key Takeaways



**Purpose:** Review details of the upcoming LMR filings that will change rules for participation in the 2026 – 2027 Planning Year.

## Key Takeaways

- This presentation focuses on the testing filing to be made July 14<sup>th</sup> and the second near-term LMR Enhancements filing that will be filed at a later date with the intent to be effective for the 2026 / 2027 Planning Year
- The LMR testing provisions comprise three elements:
  - Testing only required for resources not overseen by a regulatory authority for the 2026 / 2027 PY
  - Testing required for all resources starting 2027 / 2028 with waiver provisions updated and clarified
  - Testing requirements and accreditation standardized for the next two PY
- This LMR participation rule enhancements filing focuses on:
  - Criteria for LMR replacement
  - Penalty provisions
  - Test deferral provisions
  - Credit requirements
  - Other clarifications

# Overview of LMR and Demand response filings

Topic/Effort	Key Objectives of FERC Filing	Anticipated Filing Date	Anticipated Effective Date
Demand Response Participation Rules Enhancements	<ul style="list-style-type: none"> <li>Address issues identified by FERC Office of Enforcement and IMM with respect to Demand Response Resources (DRRs) and Load Modifying Resources (LMRs) currently participating in MISO's Markets</li> </ul>	Filed March 21, 2025 ER25-1729	July 19, 2025
Dual Registration of EDRs	<ul style="list-style-type: none"> <li>Eliminate dual registration for EDRs as a LMR and/or DRR to align the incentive signals sent by the participation options</li> </ul>	Filed April 25, 2025 ER25-2050	July 19, 2025
Demand Response and Emergency Resources Reforms (formerly known as LMR Reforms)	<ul style="list-style-type: none"> <li>Improve availability, operational effectiveness, and accreditation of demand response and emergency only resources to allow earlier access during emergency conditions based on notification times</li> <li>Key elements: i) Participation Options, ii) Measurement &amp; Verification Baseline methodology, iii) Accreditation, iv) Real-time availability, v) MISO Initiated Testing</li> </ul>	Filed April 4, 2025 ER25-1886	September 1, 2027
LMR Testing Rules	<ul style="list-style-type: none"> <li>Provide a standard, clear testing requirement for Demand Resources participating in the PRA</li> <li>Resources without contracts overseen by regulatory authorities will be required to test 2026 / 2027 PY</li> <li>Resources without explicit testing waivers approved by regulatory authorities will be required to test in 2027 / 2028 PY</li> </ul>	July 14, 2025	July 15, 2025
LMR Participation Rules Enhancements	<ul style="list-style-type: none"> <li>Clarify when and how MPs can replace LMRs during a Planning Year after clearing in the PRA</li> <li>Test Deferral</li> <li>Update non-performance penalties*</li> </ul>	2025	Tentatively June 1, 2026 for PY2026-27

# Changes applicable 2026 /2027 PY Subject to FERC Acceptance

Filing	Changes that apply to 2026 / 2027 PY
DRR Rules Enhancements	<ul style="list-style-type: none"> <li>• Increased clarity regarding qualification requirements for LMRs</li> <li>• Increased data submission requirements after a deployment</li> <li>• Measurement and Verification explicitly approved by MISO</li> </ul>
LMR Testing Rules* (To be filed July 14 <sup>th</sup> )	<ul style="list-style-type: none"> <li>• Resources will need to provide a real power test unless overseen by a regulatory authority                          Testing, Data submission at the time of registration, and Accreditation to provide clarity and standardization</li> <li>• Aggregations may continue to use the FSL baseline until 28 / 29 subject to restrictions</li> <li>• Changes to credit requirements for resources electing a waiver to reflect Ex-Post Real-Time LMP price floors</li> </ul>
LMR Participation Rules Enhancements (To be filed at a later date)	<ul style="list-style-type: none"> <li>• Demand Resource Deferral Notice changes                          Resource must begin operations prior to March 1 to qualify, and the test must be performed prior to the start of the Season rather than the Planning Year</li> <li>• LMR will be permitted to replace under certain conditions</li> <li>• LMR penalties strengthened for non-performance and under-performance</li> </ul>
Dual Registration of EDRs	<ul style="list-style-type: none"> <li>• Dual-registration of EDR and LMR no longer permitted</li> </ul>

# Changes applicable 2027 /2028 PY Subject to FERC Acceptance

Filing	Changes that apply to 2027 / 2028 PY
LMR Testing Rules (To be filed July 14 <sup>th</sup> )	<ul style="list-style-type: none"><li>• All resources will be required to perform a real power test unless explicitly exempted by a regulatory authority</li><li>• Credit requirement for all resources adjusted to permit a waiver anytime a resource has fully met its performance obligations when issued Scheduling Instructions and has not experienced a change in operations</li><li>• When MISO-initiated testing begins, MISO-initiated tests will count towards the requirement to obtain a testing waiver</li></ul>

# Changes applicable 2028 /2029 PY Subject to FERC Acceptance

Filing	Changes that apply to 2028 / 2029 PY
Demand Response and Emergency Resources Reforms (formerly known as LMR Reforms)	<ul style="list-style-type: none"> <li>Changes to the participation options                             <ul style="list-style-type: none"> <li>LMR split into LMR – Type I, LMR – Type II</li> <li>Creation of Non-Emergency BTMG</li> <li>Removal of dual-registration of any kind</li> </ul> </li> </ul>
	<ul style="list-style-type: none"> <li>Measurement &amp; Verification Baseline methodology                             <ul style="list-style-type: none"> <li>FSL no longer permitted to aggregate</li> <li>Inclusion of Statistical Interval M&amp;V</li> <li>Data submission requirement for the entire Planning Year</li> </ul> </li> </ul>
	<ul style="list-style-type: none"> <li>Accreditation                             <ul style="list-style-type: none"> <li>Accreditation determined by real-time availability brings LMR accreditation into alignment with Schedule 53A Resources</li> <li>Accreditation split into multiple parts for each participation option/resource type to properly capture capability</li> </ul> </li> </ul>
	<ul style="list-style-type: none"> <li>Real-time availability                             <ul style="list-style-type: none"> <li>Real-time availability changes emphasis accurate availability information for all resource types improving reliability</li> </ul> </li> </ul>
	<ul style="list-style-type: none"> <li>MISO Initiated Testing                             <ul style="list-style-type: none"> <li>Ensure resources are testing periodically ensuring resources can respond to a Scheduling Instruction</li> <li>Provides additional checks on resources ability to provide useful Demand reduction</li> </ul> </li> </ul>

# LMR Enhancements

To be filed Later this Year

# LMR Replacement Overview

- LMR replacement may not be made after the fact
    - If a resource is penalized, it may not use replacement to avoid the penalties
    - After the fact replacement does not improve the reliability concerns that resulted in the resource being penalized
  - Resources must replace at least two (2) weeks in advance
    - This aligns with the requirements for Generation Resources to replace
  - A resource **that is being used to replace** assumes the performance obligations of the resource **being replaced**
    - If replacing with an LMR, there is an Emergency obligation
    - If replacing with a Generation Resource, there is a Day-Ahead “must offer” obligation
- BTMG Replacement Eligibility Criteria
    - **All** Outages
    - Environmental restrictions
  - DR Replacement Eligibility Criteria
    - Change in ownership of end-use facility
    - RERRA action resulting in the termination of a contract
  - IMM approval may be sought to enable replacement for other reasons

# LMR Penalties - Applicability

LMRs are subject to performance penalties for one of two reasons:

1. The LMR has not met its minimum performance obligations, was unavailable, and was not replaced
  - This means an LMR that was unavailable for any reason and has not deployed for the minimum 5x in a Summer would be penalized unless replaced ahead of time
  - Resources that have deployed for the minimum required times (5x in Summer/Winter, 3x in Fall/Spring) are not subject to penalties for being unavailable
  - Pending FERC approval, beginning 2028 / 2029 PY the minimum requirement reduces to 1x per Season
  
2. The LMR provided less Demand reduction than it submitted as available to the DSRI
  - This means an LMR that was registered at 10 MW, submitted 5 MW of Demand reduction capability at the time the SI was issued would only be subject to penalties if providing less than 5 MW of Demand reduction
    - MISO applies a Tolerance Band based on the type of M&V being used, performance within the Tolerance Band will not be subject to penalties

# Performance that will not be penalized

- A DRR or LMR not using the FSL baseline will use the Tolerance Band defined in Module C 40.3.4
  - A DRR is not subject to ACP penalties for any reason outside of an Emergency
  - The minimum Tolerance Band for a DRR and LMR that does not have telemetry has been adjusted from 4 MW to 0.1 MW
- A Demand Resource using the FSL baseline must achieve the FSL, as defined above, and maintain Demand at or below the FSL for the entire duration of the Scheduling Instruction
- Failure to perform due to a reason of Force Majeure will be exempted
  - Maintenance is no longer going to be a sufficient reason to request exemption from performance penalties
  - A resource that is operating at or below its FSL or that is not operating should indicate 0 availability in the DSRI
  - A resource that has Self Scheduled will have performance measured relative to this Self Schedule
- Over performance of a DRR or LMR will never result in ACP penalties

# LMR Penalties Overview

- Partial Failure and Complete Failure to perform defined
  - Differentiated by DR and BTMG to account for different characteristics
  - Demand failures measured by the reduction provided by the first Hour and the ability to hold the reduction for four hours
  - BTMG failures measured by amount of Energy produced relative to the total Scheduling Instruction issued
  - A resource that has not met its minimum performance obligations is subject to a complete failure to perform
- ACP Penalties
  - ACP penalties are included to ensure the penalties are strong enough
  - Currently, in the most extreme case a resource will be subject to penalties equal to about half of the auction revenue collected
  - The incentive is for resources to be registered without concern on their ability to deploy as the probability of deployment is low and penalties for failure to perform still result in substantial profits
- Disqualification
  - A resource will be disqualified after two performance failures for the remainder of the Planning Year and for the next Planning Year and will be subject to Capacity Replacement Non-Compliance Charges for any Seasons after the Season it has been disqualified in, for which it has Cleared ZRCs

# LMR Penalties – Consequences

- For a resource experiencing a partial or complete failure to perform, the same Real-Time penalties currently imposed will be applied
- MISO will include a penalty to the ACP to be charged at the end of the Season

$$ACP \text{ Penalty} = (\text{shortfall percent})(\text{cleared ZRC})(\# \text{ days Season})(ACP) \left( 1 - \frac{\# \text{ times performed}}{\# \text{ times called}} \right)$$

- A resource may be disqualified after the first complete failure to perform if there is no indication that the resource even attempted to perform
- For a resource experiencing two complete failures to perform in the same Season, this penalty will be changed to ACP plus daily CONE and the resource will be disqualified for the remainder of the Planning Year and for the next Planning Year

$$ACP \text{ Penalty} = (\text{shortfall percent})(\text{cleared ZRC})(\# \text{ days Season})(ACP + \text{Daily CONE}) \left( 1 - \frac{\# \text{ times performed}}{\# \text{ times called}} \right)$$

# Demand Response Deferral Notice Changes

- Change the date the test must be performed by to the last Business Day of the Season prior to the Season the resource has cleared
  - i.e. the last Business Day of August before participating in the Fall
- Failure to demonstrate registered demand reduction will result in a charge equal to:  
$$\text{shortfall} * (\text{ACP} + \text{Daily Cone})$$
for each Day of the Season(s) the resource cleared.
- The Demand Response Deferral Notice is only available to resources currently operating that either cannot perform the test by the registration date or anticipate an increase in operations after the PRA
  - A resource must be able to provide operational data prior to March 1 to qualify for the deferral
- Demand Resources that expect to begin operations after the registration deadline will not be permitted to participate in the PRA but may be used to replace ZRCs after undergoing a valid self-test

# Firm Service Level

- Firm Service Level: The MW portion of the total demand of a Demand Resource that is not subject to curtailment as a Demand Resource.
- Performance of a Demand Resource utilizing the firm service level baseline will be assessed based on whether the Demand Resource achieves its registered Firm Service Level from any starting level of Demand.
- A Demand Resource will be deemed to have achieved its registered Firm Service Level if, by the Hour specified in the applicable Scheduling Instruction, its Demand is at or below the lesser of the following:
  - a. One hundred ten percent (110%) of the registered Firm Service Level; or
  - b. The sum of the registered Firm Service Level plus one (1) MW.
- Aggregations may use FSL subject to restrictions

# Aggregations of Firm Service Level

- All aggregations of FSL resources will be tested to evaluate the probability of deployment whether individually registered or registered in aggregate
  - If the frequency of deployment of an aggregation is less than 75% as frequent as if the resources were registered individually, MISO will require a different M&V technique to be used
- No component of the aggregation may register with more than 25% of its average Demand consumed during the top 500 Hours in each Season
  - If a DR has submitted documentation lowering the testing requirement, the FSL requirement will be lowered accordingly
- These rules ensure resources are compensated for performance in a manner consistent with other M&V – without these restrictions, it is possible to create aggregations with almost no performance obligation while receiving the same Capacity payments as they would if individually registered
- In general, aggregations of FSL should be of the same size and have low FSL relative to the size of the resource

# New Hourly-Ahead Baseline method

- Market Participants have expressed concerns with the calculated baseline and its applicability to LMRs
- To address these concerns the same M&V used for Emergency Demand Resources has been provided in Attachment TT for use only by Demand Resources registered as Load Modifying Resources
  - Resources dual registered as DRR will not be permitted to use this baseline
- This M&V takes Demand at the time the Scheduling Instruction is issued as the baseline
- Load reduction is determined by comparing to the Demand being consumed at the time of the Scheduling Instruction
- This provides a direct M&V based on real-time load conditions and addresses concerns by stakeholders regarding how the 10-in-10 baseline works with LMRs, given that many LMRs are consuming more Demand during Emergencies than they normally would be, resulting in the 10-in-10 underestimating the Demand reduction occurring

# Stakeholder Feedback Request

- Feedback is due July 23<sup>rd</sup>
- Please provide feedback on the following:
  - LMR replacement rules
  - Demand Response Test Deferral changes
  - Proposed Penalties
- MISO Dashboard ID#: *RASC-2019-9*
- Feedback requests and responses are managed through the Feedback Tool on the MISO website: [misoenergy.org/stakeholder-engagement/stakeholder-feedback/](https://misoenergy.org/stakeholder-engagement/stakeholder-feedback/)

# Testing Changes

To be filed Friday, July 14

# Resources not overseen by a regulatory authority will be required to perform a real power test for 2026 / 2027 PY

- A regulatory authority such as a Relevant Electric Retail Regulatory Authority (RERRA) or a state agency
- Resources overseen by a regulatory authority may use the testing waiver for 2026 / 2027 PY
- Beginning 2027 / 2028 regulatory approved contracts must either explicitly state the resource may waive or explicitly prohibit a real power test
  - “Customers on this rate are excluded from real power testing requirements.”
  - “Customers on this rate are not required to provide a real power test.”
  - “Customers on this rate waive the obligation to provide a real power test.”
- BTMG are not impacted by these rule changes

# Changes Overview

- Testing changes
  - Provide a standardized testing methodology to ensure all resources provide evidence of Demand reduction being registered
  - The tests must demonstrate the Demand reduction from all processes that may curtail
  - A resource may increase its Demand artificially to perform this test
  - The test may be performed at any time
  - A normal plan shut-down may be used as the test
  - A test must demonstrate Demand reduction for 15-minutes and must cover at least two-meter intervals
  - Additional documentation requirements are being imposed
- Accreditation – 2026 /2027 and 2027 / 2028 Planning Years only
  - Accreditation is being standardized
  - Demand Resources still receive 100% accreditation, but this accreditation is being explicitly defined for all resources to ensure uniformity and alignment of the testing requirements and accreditation

# Filing to be Effective July 15th

- A one-day effective date is being used to prevent confusion regarding when the testing changes become effective
- Tests performed prior to July 15<sup>th</sup> may be used provided they demonstrate the required Demand reduction
  - This means resources being registered in aggregate may test individually prior to July 15<sup>th</sup>, but any tests performed on or after July 15<sup>th</sup> must be simultaneous
- Regardless of when the resource performs its real power test, the accreditation rules will be applied
  - This means a resource will not be permitted to scale up from 50% if tested prior to July 15<sup>th</sup>
- Resources may test at anytime beginning January 1<sup>st</sup> of the Year prior to the start of the PY until they register, provided meter data can be provided
  - Meter data from the day prior to registration will be permissible
  - A Demand Response Deferral Notice is only required for resources testing after the March 1<sup>st</sup> deadline

# New Documentation and Testing Requirements

- Real power tests are the equivalent to the GVTC
- May be performed at any time, but must demonstrate Demand reduction of the loads expected to be curtailed when an asset is issued a Scheduling Instruction
- Documentation will be required to be submitted by the end-use customers and Market Participants – overview in appendix with full details in the posted BPM redlines
- Documentation requirements aim to provide MISO with more information regarding how MPs estimate the load reduction, provide a basis to compare the load reduction among other resources, and improve visibility into what is being registered
- Resources using the Firm Service Level M&V methodology must demonstrate the ability to curtail Demand from any point of operation to the FSL
  - This is achieved by requiring resources to test from a point with high Demand consumption

# Standardized Accreditation or how testing aligns with accreditation

- Resources not using the Firm Service Level will be accredited at the value tested
  - For resources waiving the requirement to perform a real power test, the estimated Demand reduction capabilities of the resources that are curtailing will be used to accredit the resources
- Resources using the Firm Service Level baseline will be accredited based upon the LSE/EDC obligation for non-ARCs
- For ARCs, the current procedure has been altered from the average load of the assets up to the last three years' seasonal MISO system peak hours to the procedure described in the appendix
  - The purpose of this change is to ensure balance the LSE load obligation against the ARC registration process
  - An ARC may provide evidence prior to February 1 of curtailments arising as a result of deployment by MISO – such evidence may be used to exclude the days during which curtailment was occurring
- As part of the load obligation submission process, LSEs will be required to submit an itemized list of known LMRs participating in the MISO system as part of the load forecast
  - LSE's will not be permitted to register LMRs that are not on this itemized list
  - MISO will provide LSEs with a list of LMRs participating in their system prior to Sept 1
  - ARCs accreditation is designed to ensure LSEs do not crowd out ARCs while ARCs cannot artificially inflate an LSEs load obligation
    - An ARC registering a DR after Feb 1 will receive accreditation equal to the LSE forecast for the resource regardless of test results

# Waiver Requirements

- Short-term waiver provision:
  - For PY 2026 / 2027, resources overseen by an applicable regulatory authority will be permitted to waive the requirement to perform a real power test subject to the credit requirements listed on the next slide
- Long-term waiver provisions:
  - Beginning PY 2027 / 2028, resources will need explicit language in a regulatory authority approved contract waiving the requirement to perform a real power test
  - Beginning PY 2026 / 2027, all resources will be permitted to waive the obligation to conduct a real power test provided:
    - They have responded to at least one Scheduling Instruction over the prior three years – this will include a MISO-initiated test
    - They have not experienced a penalty for non-performance or under-performance
    - The resource(s) have the same operating characteristics as when registered
      - For clarity, accreditation is not the requirement for this, the determining factor is the total registered capability of the resource, i.e. Capacity Rating

# Credit Requirement Changes

- These changes have been added to the testing filing to provide an effective date of June 1 for the LMR Enhancements filing and avoid confusion regarding penalty provisions effective with that filing
- Reflect the increase in Ex-Post Real-Time LMP price floor during EEA 2 events that was put in as part of ER21-700 to increase the price floor from \$200/MWh to \$1,000/MWh
- The effects of these changes is to increase the credit requirement from \$2,400/MW to \$12,000/MW for resources seeking a waiver in the 2026 / 2027 PY
- Beginning with the 2027 / 2028 PY, the waiver requirement will change so that no credit requirement is needed



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# Appendix

# Test Requirements – Demand Resources not using an FSL

- Resources that reduce Demand *by* an amount
- The purpose of the test is to demonstrate the Demand reduction capability of a resource if ALL of its load interruptions occur simultaneously – Documentation requirements are designed to provide clarity with what is deployed and how much it can provide
- For individually registered resources, the test may be performed at any time
- For an aggregation of resources, the test must be performed must be performed simultaneously
  - If a test has already been performed and the MP is satisfied with the test, this will be permitted for this year only
- Resources will be permitted to scale up by no more than 25% (i.e. 8 MW to 10 MW) due to weather
  - MISO may reject a scale-up if this is not justified
- Residential programs may scale up by no more than 25% for size
  - MISO will reject a residential program in which less than 75% of the aggregation was tested
- Tests must occur within the registered notification time
- The resource must hold for a minimum of 15-minutes and demonstrate this hold across 2 intervals of meter data
- A normal plant shutdown may be used, however each resource that would be expected to curtail must curtail to provide a valid test
  - If another load process is occurring that provides the load reduction, this will not be included in the real power test

# Test Requirements – Demand Resources using an FSL

- Resources that reduce Demand to an amount
- The purpose of the test is to demonstrate the Demand reduction capability of a resource if reducing its Demand from any point in the load process to its Firm Service Level – Documentation requirements provide clarity regarding how the FSL was determined
- The test may be performed at any time regardless of aggregation status
- The test must demonstrate a Demand reduction from a point equal to at least 80% of the peak Demand
  - MISO will perform an outlier test and ignore points greater than 2 SD of the mean – this ensures random peaks do not adversely impact the resources requirement to test
- Resources using an FSL may only aggregate if the FSL is no more than 25% of the peak Demand used at a time (i.e. if a 10 MW peak Demand, the FSL must be no greater than 25%)
  - The same outlier test will be applied when determining the maximum peak Demand
  - MPs may also submit documentation for a lower point of Demand to satisfy this criteria, in this instance the Demand reduction must occur from a point above this value
  - MISO will also evaluate aggregations of FSL on a case-by-case basis and may require resources to use a different baseline
- Tests must occur within the registered notification time
- The resource must hold for a minimum of 15-minutes and demonstrate this hold across 2 intervals of meter data
- A normal plant shutdown may be used, however each resource that would be expected to curtail must curtail to provide a valid test
  - If another load process is occurring that provides the load reduction, this will not be included in the real power test

# Example of a test of an aggregation with a 4-hour minimum notification time

	1500	1600	1700	1800	1815	1830	1845	1900	1915	1930	1945	2000	2015	2030	2045	2300	0000
Resource A	0	7	10	3	2	8	7	2	2	1	2	0	4	10	3	3	1
Resource B	10	7	1	10	9	4	8	1	1	3	4	9	0	10	4	0	10
Resource C	2	2	6	1	3	2	0	3	2	3	2	10	2	3	10	4	2

This Demand Resource is an aggregation of three assets. To comply with the testing requirements, the tests may begin at different times but must all be complete at the same time. The test must also demonstrate reduction for 2 intervals.

In this example, the resources were submitting hourly meter data with 15-minute interval data provided around the time of the test. Interval data at 1900 and 1915 satisfied the requirements for a 15-minute minimum hold and 2 intervals demonstrating the hold.

# End-User Customer Requirements

The end-use customer, other than residential customers, must provide documentation on their letterhead or through email from a representative of the organization specifying:

1. How is the load reduction achieved
2. The operating procedures used by the customer to facilitate the Demand reduction including:
  1. The method used to communicate with the MP
  2. Procedure used to curtail load
  3. Expected time to provide the curtailment
3. Load that is not subject to curtailment
4. Verification the load curtailed at the time of the real power test represents load expected to be curtailed when called upon
5. MISO may request additional documentation as needed
  1. MPs will be required to provide contact information for the end use customer at MISO's request if additional information is required – end use customers will not be contacted to curtail load

# Market Participant Requirements

In addition to the historical documentation requirements, Market Participants registering a Demand Resource will be required to provide the following:

1. An itemized estimation of the Demand reduction expected to be achieved by each resource being registered
  1. MISO will build a database cross-checking registered values to help identify any concerns
  2. MISO will work with MPs when concerns are identified and may reduce the accredited value of an asset
2. If using a Firm Service Level, documentation supporting the Firm Service Level must be provided
  1. This documentation should list load processes expected to continue operating and details regarding how the FSL was estimated
  2. Contractual language with an LSE/EDC supporting an FSL is valid documentation
3. Hourly meter data spanning the most recent complete Season for which data is available for each Season the resource wishes to participate in the PRA
  1. New resources must be operational prior to March 1 to be eligible to participate in the PRA though a test deferral may be submitted for such resources
4. Documentation supporting the real power test, such as equipment curtailed, meter data around the test, and other documentation that provides clarity into what was curtailed and why MISO can anticipate Demand reduction at the time