



FERC Order No. 2222 Compliance

Distributed Energy Resources (DER) - FERC Order 2222 Compliance (MSC-2019-2)

DER Task Force
July 24, 2025

Purpose & Key Takeaways



Purpose:

Review MISO's Order No. 2222 compliance directives relating to the January 2025 order.



Key Takeaways:

- MISO submitted its 60-day compliance filing on March 17, 2025. The Commission has accepted this filing
- MISO submitted its 180-day compliance filing on May 16, 2025, addressing the DRR – Type I participation option. MISO is awaiting Commission action on this filing.
- On July 10, 2025, the Commission issued an order addressing arguments raised and denying rehearing.

Compliance Filing Update

- MISO submitted its 60-day compliance on March 17, 2025.
 - Removed the 10 MW threshold from section 64.1.1.f of its Tariff
 - Clarified its coordination process to ensure the DERA understands how it is to satisfy its tariff obligation to update applicable bidding parameters of its DEAR or explain why such revisions are not necessary
- On June 2, 2025, the Commission issued a letter order accepting MISO's March 17 filing.

Compliance Filing Update

- MISO submitted further compliance on May 16, 2025, informing the Commission that it will not include the DRR – Type I option as a component of O2222 compliance
 - The Commission directed MISO to either revise the DRR – Type I option to fully comply with the requirements of O2222 or remove the option entirely from its compliance proposal
 - Compliance would be unduly burdensome and would require system and other changes not likely implementable before full compliance with O2222 in 2029/2030 (e.g., providing all products)
- The May 16, 2025, filing is still pending before the Commission.

Compliance Filing Update

- On July 10, 2025, the Commission issued an order addressing the arguments raised by Voltus on rehearing.
 - DRR – I option should be retained
 - Full implementation should be accelerated
- The Commission denied rehearing and provided additional support for its findings in the January 2025 Order.



Questions?

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