# MISO Indiana Utilities

AES Indiana, CenterPoint Energy, Duke Energy Indiana, and NIPSCO

IURC FERC 2222 Indiana Implementation Stakeholder Workshop

March 2, 2022

### Agenda (2:45 – 3:30pm)

- Introduction, Indiana Utilities, & DERs in Indiana Overview
- Planning
- Operations
- Other Topics part of FERC 2222 Implementation
- Other Related Topic

### Introduction to MISO Indiana Utilities & DERs in Indiana\*

- MISO Indiana Utilities have ~approx. 426 MW of DERs connected to each utility's respective distribution systems
- DERs owned and operated by ~approx. 7,986 customers in Indiana
- A majority of customer-sited DERs are solar resources. Other DER resource types include wind, CHP, etc.

\*as of 12/31/2022

# Planning Time Horizon (1 of 2) Generation Interconnection

### Unknown Impact on Interest in Distributed Generation

- $\circ~$  Modification of MISO compliance filing
- $\circ$  Supply side developments
- $\circ~$  Capacity accreditation
- MISO's Long Range Transmission Planning
- $\circ~$  Interconnection path of least resistance

#### Calls for:

### • Flexibility in Interconnection Regulations

- Non-serial application processing (for example, batching of applications for study)
- o "Best-efforts" review timelines
- $\circ~$  Size limits
- Order 2222 RTO implementation-compliant metering and telemetry requirements (any interconnecting generator is a potential DER Aggregation component)
- o Speculative application prevention
- $\circ$  Fee structures

# Planning Time Horizon (2 of 2) Aggregation Enrollment / Modification

- Customer Protections
  - $\circ$  Lists
  - $\circ~$  Information
  - Rules of engagement
- Reliability Under a 60-Day Clock
  - $\circ$  Submission requirements
  - o Distribution utility-specific standards
- Modification
  - Definition of "material"
  - o Frequency
  - $\circ$  Timing

- Double counting
  - Aggregator status
  - Policing mechanism

### Operations Time Horizon (1 of 2)

### • Operation oversight and control of DERs

• Necessary FERC 2222 topic to address

## Operations Time Horizon (2 of 2)

- Operational control of aggregated DERs in Indiana
- Functionality needs for distribution system operations
- System configuration for system reliability and safety
- Override and dispute resolution
- Metering

 $\,\circ\,$  Impact on wholesale dispatch

## Other Topics part of FERC 2222 Implementation

### • Aggregators as Public Utilities

- $\circ~$  Customer protection
- $\circ~$  Participation guidelines

### Cost Recovery/Allocation

- $\circ$  Implementation
- Planning time horizon
- Operations time horizon

Other Related Topic: Adoption of IEEE 1547-2018 Part of Interconnection Rules Process

- IEEE 1547-2018 requires DER to be capable of providing support to the bulk power system (BPS)
- IEEE 1547-2018 requires DER to be capable of communicating but leaves the decision to use a local DER communication interface or to deploy a communication to the Area EPS operator (utility)

### Adoption of IEEE 1547-2018 Part of Interconnection Rules Process (continued)

- IEEE 1547-2018 standard does not address aggregated behavior of DER at a transmission node or at multiple points of common coupling (PCC)
  - "The performance requirements of this standard apply to interconnection of either a single DER unit based on that unit's rating or multiple DER units within a single Local EPS ("DER system"), based on the aggregate rating of all the DER units that are within the Local EPS."
- IEEE 1547-2018 does not apply to all DER as defined by FERC Order 2222 (for example, does not apply to energy efficiency or demand response)

# Questions?

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# Appendix

## Topics on IURC Implementation re: FERC Order 2222 website

- 1. The appropriate or preferred process or processes to utilize in the development of rules implementing FERC's Order 2222 (informal, formal rulemaking, and/or formal investigation).
- 2. Interconnection of component DERs to the distribution system.
- 3. Adjudication of (pre-registration/aggregation registration) disputes.
- 4. Operational oversight and control of DERs.
- 5. Distribution utility overrides of DERs to maintain reliability, and disputes arising therefrom.
- 6. Cost allocations (issues re: technical review costs/upgrades/needed technology/considerations of subsidizations, etc.).
- 7. Dual participation (retail and wholesale participation) and double-counting concerns or challenges.
- 8. State vs. Federal jurisdictional issues.
- 9. DER aggregators as "public utilities".
- 10. IEEE 1547-2018 standardization.
- 11. Coordination among RTO/utility/aggregator/IURC.