



FERC ORDER 2222 & DER POLICY AND IMPLEMENTATION REPORT

July 2026

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CURRENT NEWS AND NEW DEVELOPMENTS

Summary of the latest developments in FERC Order 2222 and DER policy implementation

FERC and several states have acted on distributed energy resource (DER) policy, the implementation of virtual power plants (VPPs), and FERC Order 2222 in the last several months. A summary of the actions is provided below.

RTO/ISO Order 2222 Implementation:

- NYISO requested an extension of the effective date on April 15, 2026. The original effective date was December 31, 2026, and they requested a new date of April 30, 2027. FERC accepted this extension on July 30, 2026. [[LINK](#)]
- FERC accepted SPP's third compliance filing to address directives include in FERC's September 2025 compliance order by letter order on May 21, 2026. The third compliance filing addresses two non-controversial changes required by FERC: clarifying that the host utility is the EDC that will be reviewing DER aggregations and clarifying nonperformance penalty terms. [[LINK](#)]

Other DER Policy Developments:

- Vermont's final order adopting Rule 9.00 closes a rulemaking addressing energy storage that has been open since 2021. The rule includes provisions regarding the installation, construction, operation, and aggregation of energy storage facilities with nameplate ratings of 100 kilowatt (kW) or greater including battery and non-battery systems. The rule includes streamlined processes for facilities that are 100 kW to 5 megawatts (MW). The

rule includes provisions regarding the installation, construction, operation, and aggregation of energy storage facilities with nameplate ratings of 100 kilowatt (kW) or greater including battery and non-battery systems. The rule includes streamlined processes for facilities that are 100 kW to 5 megawatts (MW). The rule also includes requirements for DER aggregators participating in wholesale markets. [[LINK](#)]

- In Michigan Public Service Commission Case No. U-22065, the MPSC opened a docket to collaboratively consider and address issues related to advanced metering infrastructure. The purpose is in part to develop guidelines for next generation AMI meter purchasing, including consideration of competitive bidding and the necessary and desired functionality of advanced meters as it relates to the grid and functionality for distributed energy resources (DERs) and renewable energy expansion. [[LINK](#)]
- Also in Michigan, in June DTE Electric Company (DTE) filed an Expedited Pilot Application in Case No. U-21653 for a Virtual Power Plant (VPP) pilot. The pilot program seeks to enroll up to 100 residential batteries from the Veridian neighborhood in Ann Arbor into a virtual power plant operated by DTE via the Sonnen DERMS application. The proposed customer incentive is \$105/kW-year, with a maximum incentive value of \$504 per year per battery. The proposed program is intended to evaluate customer enrollment rates, customer charging patterns, and event participation. The pilot is currently planned to operate for 2 years. [[LINK](#)]
- The New Jersey Board of Public Utilities issued a VPP Straw Proposal on July 16, 2026. The Straw Proposal proposes a statewide framework for aggregating customer-sited DERs—including batteries, smart thermostats, EVs/chargers, and other flexible loads—to reduce peak demand and provide grid services, with participating customers compensated for their performance. The Straw Proposal is intended as the foundation for New Jersey’s first statewide VPP program and is being developed in NJBPU Docket QO26030099 pursuant to Governor Sherrill’s Executive Order No. 2. [[LINK](#)]
- The District of Columbia’s Department of Energy and Environment released a report entitled “Unleashing Virtual Power Plants in the District of Columbia: Recommendations for a Regulatory Roadmap to Implement FERC Order 2222” in August 2026. Kathan Energy Consulting prepared the report, which focused on the core regulatory actions that the District of Columbia will need to undertake implementation of FERC Order 2222 in the District.
- NAESB – The working group at NAESB has been working to develop a standard for the minimum set of data requirements that should be included in any DER Registry. This has been a very long and detailed process over several years and is expected to be completed in September.

KEY ISSUES ANALYSIS

The subject of this month’s report, which will be the last in the series of bi-monthly reports prepared under this project, is twofold. First, we review the issues and requirements associated with DER interconnection and the participation of DER aggregation participation in wholesale markets. Second, we review the state

of FERC Order 2222 compliance and implementation and provide a summary of the content included in the 11 bi-monthly reports produced prior to this one.

Interconnection

Because most DERs can inject electricity into the electric grid, the requirements and issues associated with the interconnection of these resources is a core issue associated with the aggregation of DERs into wholesale markets. In FERC Order 2222, the Commission reviewed DER interconnection in-depth, defined its jurisdiction over the interconnection of DERs within aggregations, and set requirements on the interconnection of DER aggregations. Ultimately, the Commission determined that the interconnection of DERs that interconnect to participate in wholesale market DER aggregations is the jurisdiction of state and local regulators. The only major requirement set by the Commission in the Order is that DERs must have interconnection agreements in place with an electric distribution company if they are to be allowed to participate in an aggregation. The Commission did examine the issue of whether aggregations of DERs need their own interconnection agreements and/or be subject to further interconnection study but did not make any determinations on that issue.

FERC Order 2222 Requirements

Because the DER aggregations addressed in FERC Order 2222 participate in wholesale markets, multiple comments were submitted on the subject and, accordingly, the Commission addressed this issue at length. In the final rule, the Commission determined that it would “decline to exercise our jurisdiction over the interconnections of distributed energy resources to distribution facilities for the purpose of participating in RTO/ISO markets exclusively as part of a distributed energy resource aggregation. Thus, FERC will not require standard interconnection procedures and agreements or wholesale distribution tariffs for such interconnections.”¹ The Commission’s logic was that its jurisdiction is limited to wholesale markets and to entities that participate in these markets, i.e., DER aggregations, not the individual DERs that comprise an aggregation. The individual DERs are governed by the state and local utility interconnection process.

Using similar logic, the Commission did not revise the Commission’s jurisdictional approach to the interconnections of Qualifying Facilities (QFs) that participate in distributed energy resource aggregations – existing rules for QFs were not changed.² Furthermore, the Commission stated that “we agree with commenters that state and local authorities, which have traditionally regulated distributed energy resource interconnections, have the requisite experience, interest, and capacity to oversee these distribution-level interconnections.”³ The Commission later clarified this jurisdictional findings in Order

¹ FERC Order 2222, P 90.

² FERC Order 2222, P 98.

³ FERC Order 2222, P 97.

2222-A, and found that the physical interconnection of DERs remains governed by state and local law for facilities interconnected to the distribution system.⁴

The Commission did address several specific interconnection issues. First, the Commission found that the “first use policy” developed in FERC Orders 2003 and 2006 does not apply to DERs within a DER aggregation. The first use policy states that the first wholesale generator interconnected to a distribution facility is generally subject to state interconnection jurisdiction; once the facility is used for wholesale transmission, later wholesale generator interconnections on the distribution facility become subject to FERC jurisdiction.⁵ Because the Commission determined that it would not exercise jurisdiction over individual DERs participating in a DER aggregation, the interconnection of these types of DERs for the purpose of participating in a distributed energy resource aggregation would not constitute a first interconnection for the purpose of making wholesale sales under the “first use” test.⁶

Second, the Commission chose not to create any universal requirements or initiate a process to standardize tariffs with regard to the adequacy of distribution utility DER interconnection review and study as it applies to DER aggregations and chose to defer to state and local regulators on the need for any new distribution-level processes and/or studies. Many DER advocates argued that existing interconnection agreements and the studies used to support these agreements are sufficient and no additional study of DER aggregations is necessary. Conversely, multiple electric industry parties such as the Edison Electric Institute argued that DER aggregations should be subject to additional study. For example, Transmission Access Policy Study Group (TAPS) states that “it may be impossible to anticipate and fully evaluate every possible combination of loads, resources, and distribution system configurations to determine in advance whether potential RTO/ISO and distributed energy resource aggregator dispatch decisions might have adverse impacts.”⁷ In response to these comments, the Commission found that that there could be different approaches to this issue that would work in appropriate circumstances. It also called for coordination between RTOs/ISO and electric distribution companies to ensure that RTOs/ISOs have the information that they need to study the impact of the aggregations on the transmission system. Finally, the Commission left the door open for possible future action on the subject: “...the Commission may revisit this policy decision in the future, should we discover abuses of the distribution interconnection process or the rise of unnecessary barriers to the participation of distributed energy resource aggregations in RTO/ISO markets.”⁸

⁴ *Participation of Distributed Energy Resource Aggregations in Markets Operated by Regional Transmission Organizations and Independent System Operators*, Order 2222-A, 174 FERC ¶ 61,197, P 47 (2021).

⁵ FERC Order 2222-A, P 47–49 is a good summary of the first use policy.

⁶ FERC Order 2222, P 97.

⁷ TAPS Comments in RM18-9 at p. 12.

⁸ FERC Order 2222, P 101.

RTO/ISO Compliance

RTO/ISO compliance with these higher-level interconnection determinations was relatively non-controversial. All the RTOs and ISOs complied with the Commission's determinations on the lack of application of FERC Order 2003 and 2006 to individual DERs participating in DER aggregations, and the Commission has approved these revisions. Each RTO/ISO revised their tariffs to clearly exempt DERs that are interconnecting so that they can participate in DER aggregations. Each RTO/ISO also implemented tailored approaches to comply with these requirements while maintaining system reliability and operational efficiency. The key theme across all implementations is the recognition that DER interconnections will be governed by state and local processes, with RTOs/ISOs focusing on coordination and review processes rather than direct interconnection oversight. Specific RTO/ISO-specific proposals include PJM's explicit statement that electric distribution companies are responsible for performing studies necessary to ensure reliable interconnection,⁹ and MISO's revisions to its tariff to establish market rules addressing interconnection. MISO's compliance requires DERs connected to the distribution system – both in front of or behind a customer meter – to complete an interconnection study and/or interconnection agreement subject to the rules of the EDC and their respective RERRA.¹⁰

State and Local Regulator Activity

FERC Order 2222 preserves state authority over the physical interconnection of individual DERs to the distribution system. As a result, many states are modernizing their small-generator interconnection procedures to ensure that interconnected DERs can participate efficiently in wholesale DER aggregations and virtual power plants (VPPs) without compromising distribution system reliability. State and local regulators are updating interconnection rules to streamline review processes, reduce queue delays, improve hosting-capacity analysis, incorporate advanced inverter capabilities under IEEE 1547-2018, establish storage-specific procedures, enable flexible and limited-export interconnections, and improve utility transparency and data sharing.¹¹ These reforms are increasingly viewed as foundational to enabling scalable DER aggregation, rather than simply facilitating the interconnection of individual solar or storage projects.

A growing number of states are also beginning to address the unique operational issues raised by Order 2222, including how utilities should review already interconnected DERs that seek to join wholesale aggregations, how operating limits and export restrictions should be communicated to aggregators, and

⁹ PJM Interconnection, *Order No. 2222 Compliance Filing of PJM Interconnection, L.L.C.*, ER22-962-001, February 1, 2022, p. 12.

¹⁰ Midcontinent ISO, *Order No. 2222 Compliance Filing*, ER22-1640-000, April 14, 2022, p. 17.

¹¹ See, for example, New York Public Service Commission, Case 24-E-0621, *In the Matter of Modifications to the New York State Standardized Interconnection Requirements and Application Process for New Distributed Generators and/or Energy Storage Systems 5 MW or Less Connected in Parallel with Utility Distribution Systems* (2024–present).

how utilities, aggregators, and RTOs should exchange operational data (e.g., California, New York, Massachusetts, Minnesota, and Maryland). While few states have adopted rules that explicitly govern DER aggregation interconnection under Order 2222, the clear trend is toward replacing traditional one-time interconnection reviews with more dynamic frameworks that support ongoing coordination between distribution utilities and wholesale market operators.

Fundamentals of DER Interconnection

To begin this discussion, it is important to note there are different definitions of DERs between FERC and NERC. The FERC definition includes demand response or load modification as FERC was focused on enabling a market for all resources. The NERC definition is limited to resources that can inject power into the grid and directly affect safety and reliability. Demand response has existed since Edison built Pearl Street, and utilities have long established operating procedures to deal with load variability and management. However, injecting power into the grid creates safety and reliability concerns that require a utility process to allow these resources to be interconnected to the grid. The distribution utility interconnection process governs these injecting resources, and demand response or load modification does not require an interconnection agreement. This topic becomes confusing largely due to a long history of load modification before DERs were more broadly accepted and being defined and integrated into the grid. In this period of time, synchronous generators located behind the meter were considered in demand response or load modification programs. Some utilities required interconnection agreements for these resources; others did not. Today, even though there might be some outliers, it should be assumed for the safety of line personnel and the reliability of the grid that all resources capable of injecting power into the grid will be governed by a utility interconnection agreement.

Going forward, the industry should have a very clear understanding of the different impact an aggregation of DERs will have on the grid versus the impact of individual DERs operating independently. Individual DERs are studied based on their specific individual parameters by the utility to determine if they will be allowed to be interconnected. The utility study considers the total system, other DERs connected to the same distribution line, and a variety of system parameters to determine whether or not to grant the interconnection. All of these DERs are installed by the site owner for their specific purposes and operate independently. The process that will be undertaken by distribution utilities when reviewing an aggregation of resources will consider the effect on the grid when all of these individual resources begin acting in unison for a specific program or market purpose. The individual, or randomized, behavior of many DERs will now change to act in a coordinated manner, and that could have very different effects on the grid. A simple comparative example is a group of individuals pulling on a rope randomly versus all of them acting in unison to pull together. The effect is quite different and must be recognized by industry going forward.

The FERC decision not to require interconnection agreements for aggregations is logical. These aggregations could be spread across many feeders or substations or an entire utility system, so the thought process of a secondary interconnection agreement does not make sense. However, each utility and RTO/ISO must have the right and ability to study the aggregation operating uniformly and its potential impact on the grid. These studies will be an important aspect of the approval process of the aggregation by both the distribution utility and the RTO/ISO.

Summary of FERC Order 2222 Tracking Project

Starting with our first report in September 2024, Collaborative Utility Solutions has issued a series of bi-monthly reports and webinars to track and dive deep into DER policy implementation at the state and regional level. Through these reports and webinars, we have provided a consolidated set of information on FERC Order 2222, RTO/ISO compliance with the Order, and state and local activity to implement FERC Order 2222 and general DER Policy. Within each report, we also tackled the highest priority issues to provide insight into these key issues and provide information on how different groups were viewing the issues. Because this is our final bi-monthly report, we are providing the following recap of the information shared and the status of FERC Order 2222 compliance and implementation.

RTO/ISO FERC Order 2222 Compliance Status

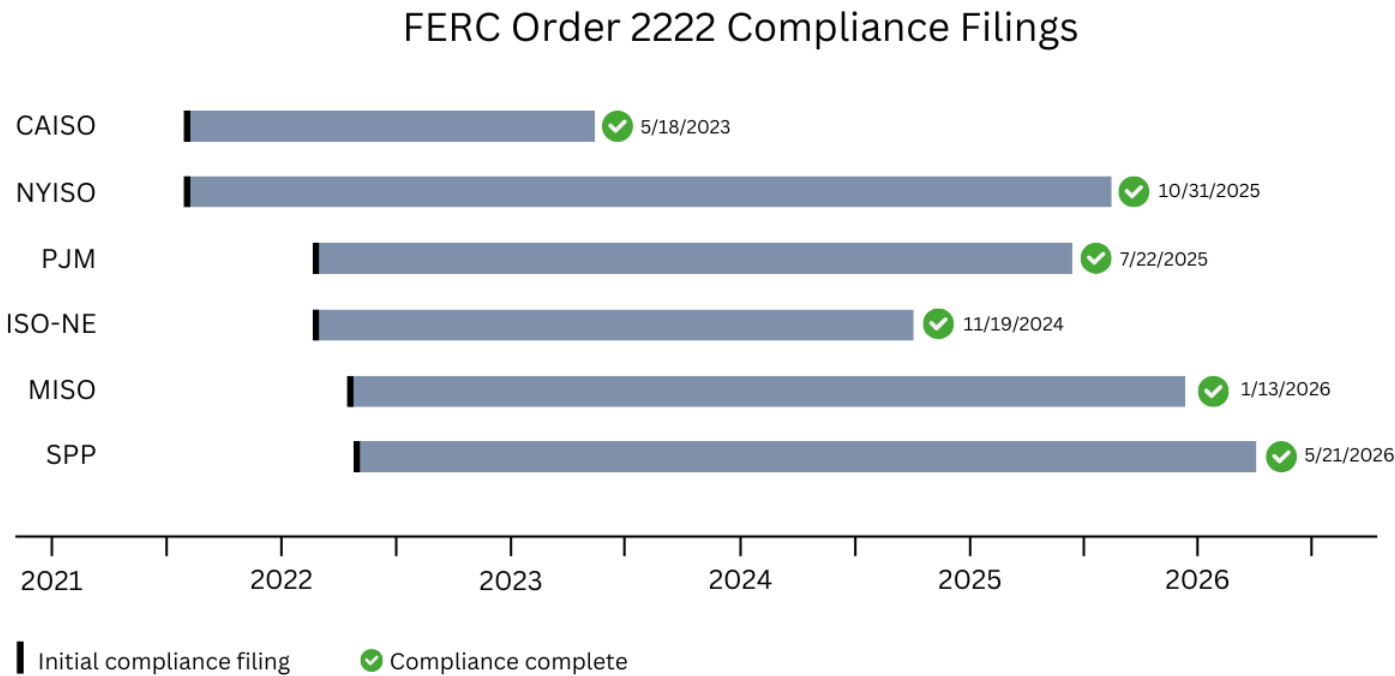


Figure 1: FERC Order 2222 Compliance

As the previous figure indicates, the FERC Order 2222 compliance filings of all six RTOs and ISOs have been approved. As noted earlier in this report, SPP received its final compliance approval in May 2026. The generally long time that occurred between the initial RTO/ISO compliance filing and final approval is testament to the complicated nature of FERC Order 2222 compliance – FERC required most of the RTOs/ISOs to submit multiple compliance filings before the Commission was satisfied.

As of July 2026, only CAISO has fully implemented FERC Order 2222. The following table lists the implementation dates, plus additional information on phased implementation. As can be seen, at least two of the RTOs and ISOs, MISO and SPP will be implementing the Order in 2029 and 2030, respectively.

RTO/ISO	Order 2222 Implementation Date	Status
California Independent System Operator	November 1, 2024	Complete
New York Independent System Operator	April 30, 2027	Partial implementation today; full Order 2222 implementation by April 2027.
ISO New England	Energy & Ancillary Services: November 1, 2026 Capacity: In place for Forward Capacity Auction 19	On schedule
Midcontinent Independent System Operator	Phase 1: June 1, 2027 Phase 2: June 1, 2029	Phased implementation
PJM Interconnection	Capacity: February 1, 2027 (for 2028/29 Delivery Year) Energy & Ancillary Services: February 1, 2028	Phased implementation
Southwest Power Pool	Second Quarter 2030	Latest implementation schedule

Figure 2: FERC Order 2222 Implementation Dates

Status of State DER Policy and Implementation of FERC Order 2222

While the RTO/ISO and FERC process is now fundamentally complete, as of July 2026, only a handful of states are actively developing policies and regulations with the explicit intent of implementing FERC Order 2222. Due to FERC approval and implementation of earlier non-FERC Order 2222 DER aggregation proposals in California and New York several years ago, these two states have either implemented the Order or will soon do so. A second group of states actively examining FERC Order 2222 includes Maryland, New Jersey, and Pennsylvania, and these states generally waited until FERC approved the PJM compliance before tackling implementation.¹² Of these states, Maryland is the furthest along. An Interconnection Work Group has drafted regulations, and the Maryland PSC has issued several orders on Virtual Power Plants that partially address FERC Order 2222.¹³ New Jersey is quickly catching up and issued a Request for Information on VPPs which included questions on FERC Order 2222 implementation issues,¹⁴ and issued a VPP Straw Proposal in July 2026.¹⁵

In addition, there are several other states that have considered aspects of FERC Order 2222. Proceedings in Indiana, Iowa, Michigan, Minnesota, Missouri, and Wisconsin focus on whether the third-party demand response and DER aggregators enabled by FERC Order 2222 can operate within their states. Of these states, Michigan and Missouri regulators decided to partially open their states to third-party demand response aggregators, and Iowa chose to fully open its state to aggregators. In addition, due to adverse court decisions in Minnesota and Wisconsin negating their earlier regulatory decisions to opt-out of allowing demand response aggregations to exist in their states, demand response aggregators can now operate in these two states.

States such as Ohio, Michigan, Texas, Vermont, and Virginia have amended DER interconnection rules or are exploring interconnection-related topics that shape the environment for enabling DER deployment. In addition to Maryland, discussed previously, states such as Colorado, Illinois, Massachusetts, Minnesota,

¹² Virginia will commence examining FERC Order 2222 implementation as part of the DER Task Force that created by the Virginia legislature this past session. 2026 Va. Acts ch. 997 (H.B. 285 / S.B. 223), § 1, establishing the Distributed Energy Resources Task Force.

¹³ See, for example, its Interconnection Workgroup and the Implementation of FERC Order No. 2222 and Retail Grid Services in Maryland, Order No. 92398, Case No. 9778, Maryland Public Service Commission. https://psc.maryland.gov/wp-content/uploads/2026/05/Order_VPP_DER_ConcRprt_OCStatusRpt-9778.pdf.

¹⁴ New Jersey Board of Public Utilities' Request for Information (RFI) Pursuant to Governor Mikie Sherrill's Executive Order No. 2 issued Jan. 20, 2026 (Docket Nos. QO26030099, QO26040116, QO24020116, QO26030059, QO24030199) (Apr. 20, 2026); Pennsylvania Public Utility Commission (PAPUC) Docket No. L-2023-3044115, In re: Distributed Energy Resources Participation in Wholesale Markets, Chapter 57: Notice of Proposed Rulemaking Order, December 18, 2025.

¹⁵ New Jersey Board of Public Utility, Straw Proposal: Virtual Power Plant Program, July 16, 2026 (Docket Nos. QO26030099); Pennsylvania Public Utility Commission (PAPUC) Docket No. L-2023-3044115, In re: Distributed Energy Resources Participation in Wholesale Markets, Chapter 57: Notice of Proposed Rulemaking Order, December 18, 2025.

Michigan, Texas and Virginia are expanding opportunities for VPPs, while Oregon is focused on microgrids. New York is continuing to work on its Grid of the Future Plan.

Information Shared

Eleven bi-monthly reports have been issued and webinars conducted since September 2025, with this report being the twelfth. Besides reporting on the latest developments in DER policy, each report contained detailed information on FERC Order 2222 implementation issues. The content of each report and its associated webinar is listed below.

- **September 2024 – Introduction and Welcome** – First tracking report introduced the project and the identified the issues that would be covered in the following bi-monthly reports. [[LINK](#)]
- **November 2024 – History of FERC Order 2222** – Overviewed FERC Order 2222, key state implementation issues created by the Order, and the status of RTO/ISO compliance. [[LINK](#)]
- **January 2025 – Governance** – Summary of the key governance and jurisdictional issues and determinations addressed and determined in FERC Order 2222, e.g., registration and licensing and dispute resolution. [[LINK](#)]
- **March 2025 – Aggregation Registration and Review** – Review of the aggregation registration and review requirements directed by FERC in Order 2222 and implemented by RTOs/ISOs, with a particular focus on the state role in this review. [[LINK](#)]
- **May 2025 – Dual Registration/Double Counting** – Summary of rules governing dual registration and double counting in FERC Order 2222 and in RTO/ISO compliance, with a focus on the role of state and local regulators in preventing double counting. [[LINK](#)]
- **July 2025 – Customer Protections** – Review of the key issues associated with the need for customer protection when implementing FERC Order 2222, with a call for state action. [[LINK](#)]
- **September 2025 – Coordination** – Coordination between DER aggregators, electric distribution companies, and RTOs/ISOs will be critically needed to allow DER aggregations to participate in wholesale markets. This report reviewed the key coordination issues. [[LINK](#)]
- **November 2025 – Metering and Telemetry** – Summary of the key issues and rules for the metering and measurement of DERs and aggregations in FERC Order 2222 and RTO/ISO compliance, and the actions state and local regulators need to undertake to support DER aggregation. [[LINK](#)]
- **January 2026 – Communications Between DERAs and EDCs** – Summary of the communications between EDCs, DERAs, and RTOs/ISOs that will be crucial in effective and reliable FERC Order 2222 implementation. [[LINK](#)]
- **March 2026 – Communications and Control for DERs** – Highlights the importance of the IEC Common Information Model in implementing DER policy. [[LINK](#)]

Closing Remarks

FERC Order 2222 has been characterized in a variety of ways by many different stakeholders. We would like to summarize our effort over the past two years by reflecting on what we believe FERC Order 2222 represents. FERC Order 2222 represents the single biggest opportunity for cost savings and collaboration in the history of our industry. With over 3000 utilities operating across three North American grid systems and governed by FERC, NERC, reliability coordinating councils, state commissions, city governments and Rural Electric boards, DERs represent a challenge that has not been faced by industry before. FERC Order 2222 provides the opportunity for collaboration towards consistent policy and implementation in a time when the US grid is desperate for additional capacity.

However, everyone is busy and focused on their own job in their own utility, ISO, commission, etc. Collaboration is hard, and utilities will remain inwardly focused without clear direction from the regulators to collaborate. The success of the industry to effectively incorporate DERs into the grid to serve as a functional resource will largely be determined by the RERRA's and their policy to guide consistent policy to safely and reliably ease the transition of DERs being incorporated into the grid.

Federal policy is now complete with the RTO/ISO community, but DERs begin in the distribution grid, and federal policy reach does not extend into this environment. The next 12-24 months will define whether we can incorporate DERs safely, reliably and effectively into the grid, and success or failure will be dependent on the RERRA community actively engaging in this discussion and requiring consistent policy and collaboration. Without this guidance, all 3000 utilities will develop their own systems and their own process, and the cost of implementing DERs will far outweigh their effective contribution.

In presentations, discussions and some of the reports, we have referenced the Renewable Energy Credit (REC) Tracking Systems as example of industry not effectively collaborating. Tens or hundreds of millions of dollars were spent by industry developing independent tracking mechanisms. Ultimately, the industry has reduced this number of systems from hundreds to less than 20 with a clear recognition of the time and money wasted by individual efforts.

RERRAs have the opportunity to require collaboration and eliminate these individual efforts in their states and utilities to safely, reliably and effectively enable DERs. Our industry history provides many different examples of exceptional collaboration from the creation of EPRI, the development of the Common Information Model, the Mutual assistance program and many more. However, when new policy is created, like Renewable Energy Credit tracking, we have failed to get in front of the issue and create effective collaboration across the industry.

The opportunity, and the challenge, is now before the RERRA's to get in front of this issue and demand collaboration. Without RERRA guidance, costs will spiral and DERs will not become an effective resource to help our nation's much needed capacity requirements.

TRACKER TIPS AND HIGHLIGHTS

The Policy Tracker is available to the public at FERC2222.org [\[LINK\]](#) .

There will be no new content added after August 2026.

The Policy Tracker allows users to filter and search for content within a database of content pertaining to DER Policy, with emphasis on the implementation of FERC Order 2222. The keyword search functionality includes review of the source documents within the database, while the filters allow users to narrow their searches based on issue topic, organization, and state.

For tips on how to use the Policy Tracker search and filter function, see the Tips and Tricks section of the November Report [\[LINK\]](#) .

Recordings and slide decks from all previous bi-monthly webinars can be viewed on the Library page [\[LINK\]](#) . If you are unable to view a webinar recording due to network restrictions please [contact us](#) and we will provide access to the recordings directly. The Library is also a great resource for important information regarding DER Policy, standards, and background information relevant to FERC Order 2222.

Upcoming Webinar

Join our final webinar on Thursday, August 27th [\[LINK\]](#) . We'll discuss Interconnection, dive into the two white papers attached to the end of the May report [\[LINK\]](#) , focusing on **Enabling DERs Through Collaboration**, and we will provide an overview of the status of FERC Order 2222 implementation and the work prepared in this project. Have questions or insights on this topic or on broader developments related to FERC Order 2222? We'd love for you to join the discussion and share your perspective!

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