

April 24, 2025
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Aggregation Registration & Review



FERC2222.org

Facilitating Collaboration Among Policy Makers on DER Integration

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Empowering the Energy Transition



DOE Project Information



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FERC Order 2222 & DER Policy Tracking



Bi-Monthly Report

With the first report in September 2024 and every other month thereafter, each report includes: ***Current News and Events***, ***Key Issues Analysis*** and ***Tracker Tips and Highlights***.

Bi-Monthly Webinar

Beginning October 2024, bi-monthly webinars are being held to present current information and allow discussion on topics.
❖ Today – **Aggregation Registration & Review**

FERC2222.org website & Policy Tracker

Launched November 2024, providing access to Policy Tracker that aggregates information related to FERC Order 2222 and DER policy that is shared with Collaborative Utility Solutions. This information is ‘tagged’ by state, ISO, and key issue to allow effective searching.

White Papers

David Kathan is leading an effort to create a series of white papers relating to DER topics over the next year.

Discussion Groups

The website includes secure chat rooms allowing policy makers a forum to discuss key issues.

Library

Includes key DOE, NARUC, NERC or other papers relevant for policy makers. Not seeking to find every paper; attempting to highlight industry leading efforts to support policy decision and implementation.



Bi-Monthly Reports

- **The Bi-Monthly Reports contain three primary sections:**
 - Current News and New Developments
 - Key Issue Analysis
 - Tracker Tips and Highlights
- **The most recent bi-monthly report follows this structure**
- **Each of these reports will be posted to the [FERC2222.org](https://www.ferc2222.org) website**



FERC2222.org – Chat Rooms live

Home Policy Tracker Reports Library Discussion Groups Contact

FERC ORDER 2222 AND DER POLICY COLLABORATION

COLLABORATING FOR SUCCESSFUL DER IMPLEMENTATION IN THE U.S.A

LATEST REPORT
FERC Order 2222 & DER Policy and Implementation Report
January 2025
[View Report](#)

NEW WEBINAR RECORDING
Introduction to FERC2222.org
December 12, 2024
[View Recording](#)

UPCOMING WEBINAR
Data Access/Privacy and Governance
February 27, 2025
[Register Now](#)

Recent FERC Order 2222 Developments



- MISO submitted its third compliance filing to FERC (March 17, 2025) addressing two outstanding issues
 - Removal of a 10MW minimum threshold
 - Addition of EDC requirement to inform DERAs when DER operation is overridden by EDC
- MISO/MISO DERTF/OMS held coordination workshop Feb. 18, 2025
- Maryland PSC issued Order No. 91603 regarding implementation of FERC Order 2222 issues, directing additional study from utilities and therefore deferring most issues to later consideration.
- Maryland PSC issued Order No. 91597, requesting Staff to consult with stakeholders to further refine its draft DERA registration application and file a modified proposal by June 2, 2025.

Recent FERC Order 2222 Developments



- New Jersey Board of Public Utilities held technical conference, and staff is synthesizing stakeholder feedback.
- Public Utilities Commission of Ohio (PUCO) requested comments on technical interconnection and interoperability rules, including proposed adoption of the IEEE 1547-2018 standard.
- In New York's *Grid of the Future* proceeding (Case 24-E—0165), the first iteration of the GOTF plan was filed, and interested stakeholders have been invited to comment by May 21, 2025.
- Several updates from NAESB up next.

Background

1994

GISB
Founded

2001

NAESB
Established

30+

Years of Standards
Development

4,000+

Standards

American National
Standards Institute
Accreditation

**Oct.
2001**

Mission & Government Coordination

Mission: The North American Energy Standards Board serves as an industry forum for the development and promotion of standards to support the wholesale and retail natural gas and electricity markets

Department of
Energy

Federal Energy
Regulatory
Commission

National
Association of
Regulatory Utility
Commissioners

National Institute
of Standards and
Technology

North American
Electric Reliability
Corporation

National
Petroleum Council

Our Areas of Focus



WHOLESALE ELECTRIC

2000+ Market Standards
9 Publications Since 2005

Market Participation

- End Users
- Distribution/LSE
- Transmission
- Generation
- Marketers/Brokers
- Independent Grid Operators
- Technology and Services

The Electric Industry Registry
e-Tag Functional Specification



RETAIL MARKETS (GAS & ELECTRIC)

1700+ Market Standards
11 Publications Since 2005

Market Participation

- Retail Electric End Users/Public Agencies
- Retail Electric Utilities
- Retail Electric Service Providers/Suppliers
- Retail Gas Market Interests



WHOLESALE GAS

600+ Market Standards
16 Publications Since 1996

Market Participation

- End Users
- Local Distribution
- Pipelines
- Producers
- Services

Common Coding System
for Interstate Pipelines

NAESB Distributed Energy Resources Activities Update

Grid Services Standardized Contract

NAESB Base Contract for the Sale and Purchase of Distribution Grid Services from DER Aggregations

Base Contract for Sale and Purchase of Distribution Grid Services from DER Aggregations

This Contract is entered into as of the following date: _____
The parties to this Contract are the following:

PARTY A [INSERT COUNTERPARTY LEGAL ENTITY NAME]		PARTY NAME	PARTY B [INSERT COUNTERPARTY LEGAL ENTITY NAME]	
ADDRESS		ADDRESS		
WWW		WWW		
BUSINESS WEBSITE		BUSINESS WEBSITE		
CONTRACT NUMBER		CONTRACT NUMBER		
D-U-N-S® NUMBER		D-U-N-S® NUMBER		
<input type="checkbox"/> US FEDERAL <input type="checkbox"/> OTHER		<input type="checkbox"/> US FEDERAL <input type="checkbox"/> OTHER		
TAX ID NUMBERS		TAX ID NUMBERS		
JURISDICTION OF ORGANIZATION		JURISDICTION OF ORGANIZATION		
<input type="checkbox"/> Corporation <input type="checkbox"/> LLC <input type="checkbox"/> Limited Partnership <input type="checkbox"/> Partnership <input type="checkbox"/> LLP <input type="checkbox"/> Other		<input type="checkbox"/> Corporation <input type="checkbox"/> LLC <input type="checkbox"/> Limited Partnership <input type="checkbox"/> Partnership <input type="checkbox"/> LLP <input type="checkbox"/> Other		
COMPANY TYPE		COMPANY TYPE		
GUARANTOR (IF APPLICABLE)		GUARANTOR (IF APPLICABLE)		
CONTACT INFORMATION				
ATTN:		ATTN:		
TEL:		TEL:		
FAX:		FAX:		
EMAIL:		EMAIL:		
• COMMERCIAL		• COMMERCIAL		
ATTN:		ATTN:		
TEL:		TEL:		
FAX:		FAX:		
EMAIL:		EMAIL:		
• ATTESTATION		• ATTESTATION		
ATTN:		ATTN:		
TEL:		TEL:		
FAX:		FAX:		
EMAIL:		EMAIL:		
• CONTRACT AND LEGAL NOTICES		• CONTRACT AND LEGAL NOTICES		
ATTN:		ATTN:		
TEL:		TEL:		
FAX:		FAX:		
EMAIL:		EMAIL:		
• CREDIT		• CREDIT		
ATTN:		ATTN:		
TEL:		TEL:		
FAX:		FAX:		
EMAIL:		EMAIL:		
• TRANSACTION CONFIRMATIONS		• TRANSACTION CONFIRMATIONS		
ATTN:		ATTN:		
TEL:		TEL:		
FAX:		FAX:		
EMAIL:		EMAIL:		
ACCOUNTING INFORMATION				
ATTN:		ATTN:		
TEL:		TEL:		
FAX:		FAX:		
EMAIL:		EMAIL:		
• INVOICES		• INVOICES		
• PAYMENTS		• PAYMENTS		
• SETTLEMENTS		• SETTLEMENTS		
WIRE TRANSFER NUMBERS (IF APPLICABLE)		WIRE TRANSFER NUMBERS (IF APPLICABLE)		
BANK:		BANK:		
ABA:		ABA:		
ACCT:		ACCT:		
OTHER DETAILS:		OTHER DETAILS:		
ACH NUMBERS (IF APPLICABLE)		ACH NUMBERS (IF APPLICABLE)		
BANK:		BANK:		
ABA:		ABA:		
ACCT:		ACCT:		
OTHER DETAILS:		OTHER DETAILS:		

- Supports bilateral contract negotiations between Distribution Utility and DER Aggregator for transactions subject to state/local regulatory authorities
- Developed at request of U.S. DoE
- Standardized terms & conditions; input from over 80 individuals representing utilities, DER aggregators, ISOs/RTOs, and regulators
- NAESB Conditions Precedent Addendum

NAESB Distributed Energy Resources Activities Update

Completed & Planned 2025 Activities



NORTH AMERICAN ENERGY
STANDARDS BOARD

➤ Cybersecurity Related-Effort

➤ Wholesale and Retail Market Joint Activity

- Review cybersecurity protections, such as Public Key Infrastructure (PKI), that may be necessary to secure electronic communications for distributed energy resources (DERs), and develop business practices as needed

➤ No action at this time

➤ Effort to Support Interoperability

➤ Wholesale and Retail Market Joint Activity

- Consider and develop business practices to support the integration of DER/DER aggregation registries by the industry

➤ First meeting held on April 21, 2025 & completion date TBD

NAESB Distributed Energy Resources Activities Update

Completed & Planned 2025 Activities



NORTH AMERICAN ENERGY
STANDARDS BOARD

➤ Contract Related-Effort

➤ Retail Market Activity Coordinated with Wholesale Market

- Develop Distributed Ledger Technology (DLT) RMQ Model Business Practices to support the automation of the NAESB Distribution Grid Services Base Contract and Conditions Precedent Addendum

- First meeting held on April 21, 2025 & completion date 3rd Q 2025

➤ Provisional Activity

➤ Wholesale and Retail Market Joint Effort

- Consider and develop of business practices to support the integration of DER management by the industry

- First meeting TBD

Contact Information

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- Phone – 713-356-0060
- Fax – 713-356-0067
- Email – naesb@naesb.org

*For further information on the organization,
please contact NAESB Staff at
713-356-0060 or naesb@naesb.org.*



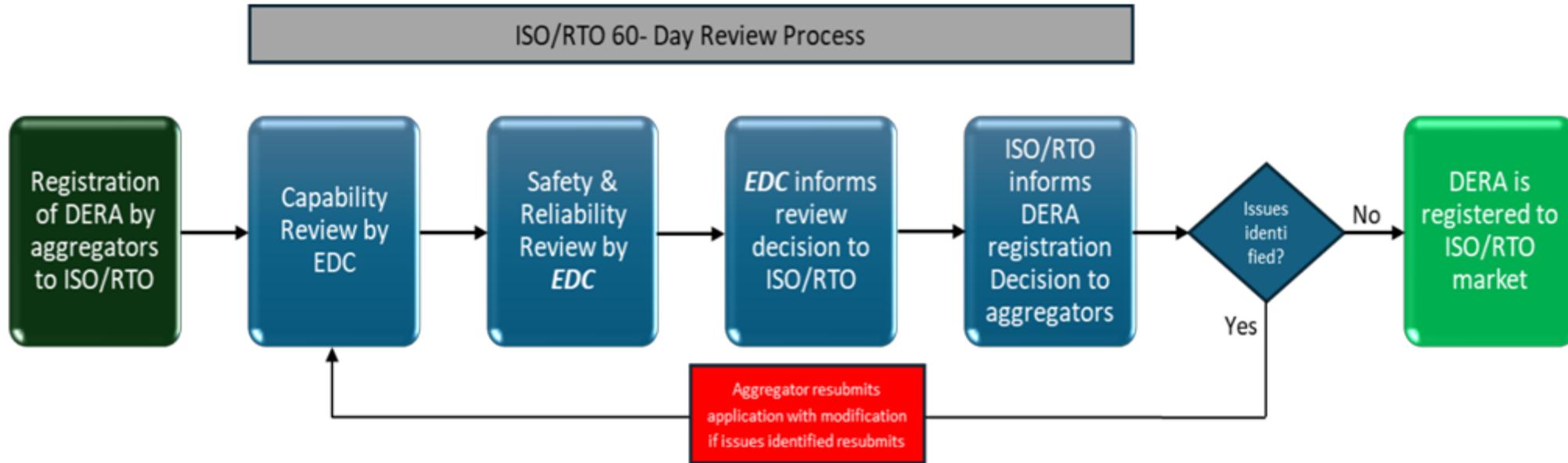
NORTH AMERICAN ENERGY
STANDARDS BOARD

Aggregation Registration & Review



- FERC Order 2222 aggregation registration and review process requires multiple steps:
 - DERAs must sign a market participation agreement with RTOs/ISOs. FERC guidance not to deviate from their general resource and market registration requirements (unless necessary).
 - The RTO/ISO can also require the DERA comply with state and local rules.
 - Registration process must identify the set of DERs.
 - EDC review
 - RERRA review (voluntary)
 - RTO/ISO Transmission impacts review
- **IMPORTANT:** This review process is separate and distinct from the EDC interconnection process. A DER that requires an interconnection agreement must complete the EDC process prior to being allowed to be placed into an aggregation in this process. The aggregation review process is reviewing the impact of multiple DERs acting in unison as part of this new Aggregation.

Aggregation Registration & Review





EDC Review

- FERC required each RTO/ISO to modify its tariff to incorporate a non-discriminatory process for timely review by an EDC.
- FERC directed RTOs/ISOs to “coordinate with distribution utilities to develop a distribution utility review process that includes criteria by which the distribution utilities would determine whether:
 1. Each proposed distributed energy resource is capable of participation in a DER aggregation
 2. The participation of each proposed DER in a DER aggregation will not pose significant risks to the reliable and safe operation of the distribution system
- FERC directed this review take no longer than 60 days.
- Two-part review
 - Capability Review
 - Reliability Review



EDC Review

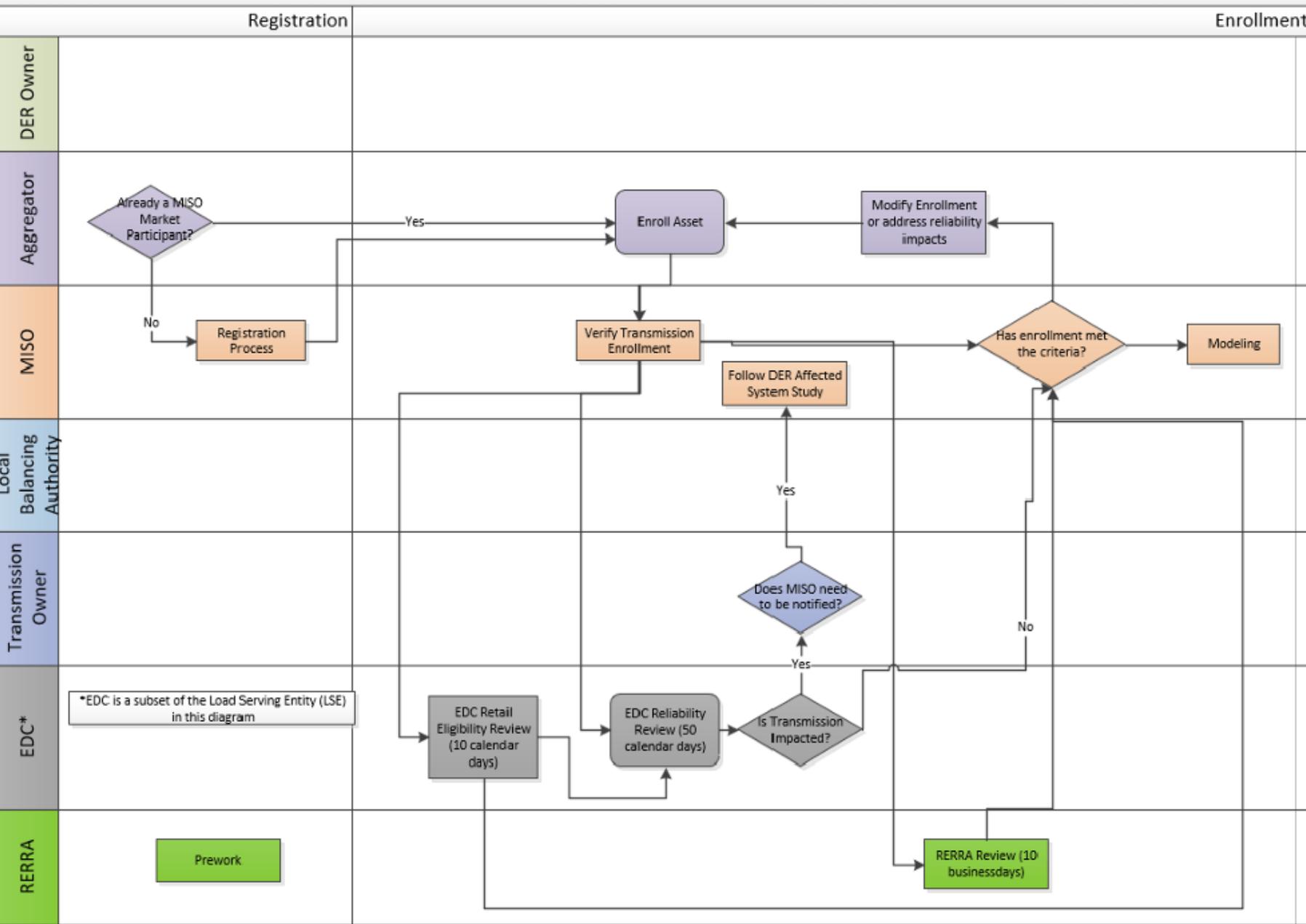
- Capability Review
 - Examine whether a DER is already participating in another retail or wholesale program that would limit participation in a DER aggregation;
 - Or whether participation in a DER aggregation would cause a DER to be double counted. For example, some states do not allow a site on net metering to participate in a DER program.
- Reliability Review
 - Review whether the participation of a DER in a DER aggregation could create safety and reliability concerns, risks, or impacts on the distribution system.
 - EDC required to provide written explanation for DER removal.
 - In addition, any necessary impact studies should align with the coordinated dispatch of the DERs in an aggregation. It is important to note this element as aggregated and coordinated dispatch of a set of DERs could negatively impact the distribution system.



RERRA Review

- The FERC guidance and subsequent RTO/ISO filings provide RERRAs the ability to participate in the review process.
- This topic has created significant conversation in stakeholder meetings as RERRAs are not typically involved in ‘operational processes’ nor are they staffed to support these activities.
- Technology enabled solutions that provide dual participation/dual counting (capability) reviews will be an important step in implementation for RERRAs to minimize the impact of this review.

Draft Wholesale Registration and Enrollment Diagram



MISO Process as one example



Key Considerations Moving Forward

- **Transparency** - Transparency of the EDC review process is essential to ensure fairness.
- **Data Access** – Rules, or systems, governing DER aggregator access to DER and customer data to facilitate EDC review will be needed. To ensure fair and open access to DER data, while preserving privacy and cybersecurity, regulators should consider requiring the use of a DER data platform like a DER Registry that can facilitate the requirements of both security and access to the required data by the different stakeholders.
- **Oversight of EDC DER Reviews** – Oversight of EDC DER reviews will be crucial to properly establish that the states and RTOs/ISOs have adequate coordination to ensure that decisions are not arbitrary and are based on clear criteria.
- **Dispute Resolution** – Dispute resolution for issues outside of FERC jurisdiction (and most likely within state jurisdiction), such as how an EDC conducts its DER review, will need state dispute resolution methods. Technology tools such as a DER Registry can facilitate dispute resolution.
- **Dual Participation/Double-Counting Policy** – As discussed above, rules governing the ability of DERs to participate in retail tariffs/programs and wholesale markets need to be developed by regulators for clarity and ability for technology tools to lower the burden for RERRAs.



We Need Your Help!

Tracking a wide range of key policy issues related to DER integration across the U.S. is no small task. To that end, state commissions and RTOs/ISOs are invited and encouraged to assist Collaborative Utility Solutions in crowdsourcing information to be included in the Policy Tracker. The value the Policy Tracker can provide will be largely dependent on policy makers sharing information with CUS each month proactively. Specifically, CUS welcomes the opportunity to periodically meet with Commissioners or key staff members at state utility commissions and RTOs/ISOs to hear from you regarding your FERC Order 2222 and DER implementation activities, key dockets, rulemakings, or other proceedings.

Please email **Suzanne Bertin** (suzanne.bertin@cusln.org) with any updates for your states or organizations that you would like to have included in the Policy Tracker, or to arrange a meeting to discuss your states or organization's implementation policy.