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# Coordination



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 – **Coordination**

## 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



- On September 19, 2025, FERC partially approved SPP's second compliance filing. SPP is directed to file another compliance filing on several aspects, including double counting restrictions, compensation requirements, distribution factors, and various operational coordination provisions. SPP is also directed to file a proposed effective date in the 2<sup>nd</sup> quarter of 2030 to implement FERC Order 2222.
- NYISO filed an amendment to its December 2024 compliance order on August 13, 2025. This new filing reflects Commission staff questions about whether the several of the bidding rules for ESRs and Aggregations of ESRs are required to address its compliance with the Commission's directives in the April 2023 Compliance Order. NYISO did not change its requested implementation date of December 31, 2026.

# Recent FERC Order 2222 Developments



- Following its May 29, 2025 stakeholder meeting regarding rules that may be needed for a registration and study process of DER aggregations participating in wholesale markets via distribution systems in Indiana, URC staff invited comments to be filed by Oct. 20, 2025. Reply Comments are now due by Nov. 3.
- The MD PSC has requested comment by Nov. 19, 2025, on utility reports filed in October related to information technology system and process planning to implement FERC Order 2222 and speed the deployment of cost-effective VPPs. A technical conference will be held Dec. 3.



# Other DER Policy Developments

- Utilities in Maryland filed their DRIVE Act proposals on July 1. Stakeholders were invited to comment on the plans, with an in-person hearing held on Sept 3.
- In New York's Grid of the Future proceeding (Case 24-E-0165), Stakeholder comments were filed in July regarding the first iteration of the Grid of the Future Plan.
- In Order 41866, the Hawaii Public Utilities Commission closed Docket No. 2019-0323, declaring that it had addressed the objectives of the docket through creation of various DER policies and programs, oversight of its Advanced Rate Design time-of-use study, and resolution of other technical matters pertaining to DERs. The Commission is considering developing a VPP or other dispatchable DER program, which would be taken up in a different docket.
- In Docket 5-EI-163, the Wisconsin PSC acted on August 13, 2025, in its investigation of Aggregations of Retail Customers (ARCs). The PSC decided it would not direct NSPW, WEPCO, WP&L, or WPSC to submit new or updated demand response tariffs regarding how they plan to work with ARCs but would require that any future filing address: 1) costs and benefits associated and proposed measures to protect non-participating customers; 2) proposed communication practices including double-counting checks; and 3) proposed practices to safeguard sharing of customer data.



# Other DER Policy Developments

- In July, in the Commonwealth of Virginia, Commission Staff filed its recommendations regarding Proposed Rules relating to interconnection for small electrical generators and storage.
- The Staff of the Public Utility Commission of Texas requested comments and reply comments on a “discussion draft” package relating to Technical Requirements and Interconnection of DERs in Project No. 54233. The documents included separate draft interconnection rules for DERs larger than 250kW and DERs smaller than or equal to 250kW, a draft rule with technical and operational requirements, plus interconnection agreements and application forms. Comments were due June 27 and replies August 8. The PUCT is not expected to take any further action until 2026 at the soonest.



# Coordination

- The integration of DERs into the electric power system necessitates increased coordination between all actors.
  - Especially crucial with the implementation of FERC Order 2222.
- Order 2222 requires
  - New obligations on electric distribution companies (EDCs) to interact with DER Aggregators (DERAs) and RTOs/ISOs
  - New procedures, tools, requirements, and adaption of existing tools
  - Particularly needed are new sets of procedures and communications for coordination between DERs, DERAs, EDCs, and RTOs/ISOs.

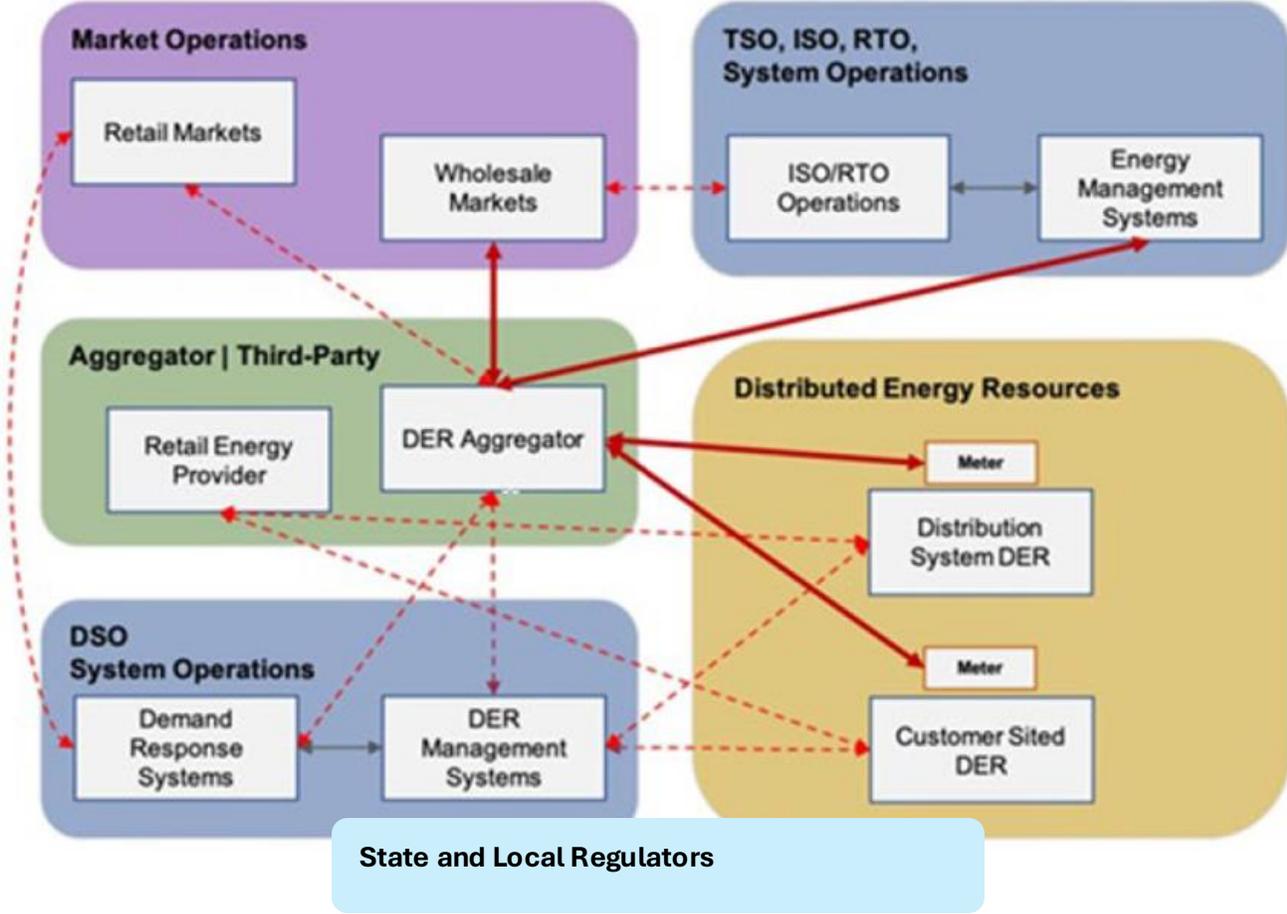
# Key Areas Where Coordination is Needed



- Coordination will be required in the following areas:
  - ***DER and DERA registration.*** Coordination between EDCs and RTOs/ISOs will be needed during all parts of DERA registration.
  - ***Dispatch and operation of DERs with EDCs.*** To maintain safety and reliability, the dispatch and operation of DERs and DERAs to provide wholesale and retail market services will need to be coordinated with EDC distribution operators.
    - Coordination will be especially needed before and after RTO/ISO day-ahead market clearing, and during real-time operation.



# DER Aggregation Interactions



Source: EPRI, DER Aggregation Participation in Electricity Markets, March 20

# FERC Order 2222 Coordination Requirements



- FERC Order 2222 requires RTOs and ISOs to:
  - Revise tariffs to establish market rules that address coordination between the RTO/ISO, DERAs, EDCs, and RERRAs.
  - Incorporate a comprehensive and non-discriminatory process for timely review (set at no more than 60 days) by EDCs of the individual DERs that comprise a DERA.
  - Require DERAs to report to the RTO/ISO on an ongoing basis any changes to its offered quantity (e.g., kilowatts) due to DER asset outages/curtailments.
  - Establish a process for ongoing coordination, including operational coordination, that addresses data flows and communication among itself, DERAs, and EDCs.
  - Identify how it will accommodate and incorporate voluntary state and local regulator involvement in coordinating the participation of aggregated DERs in RTO/ISO markets.

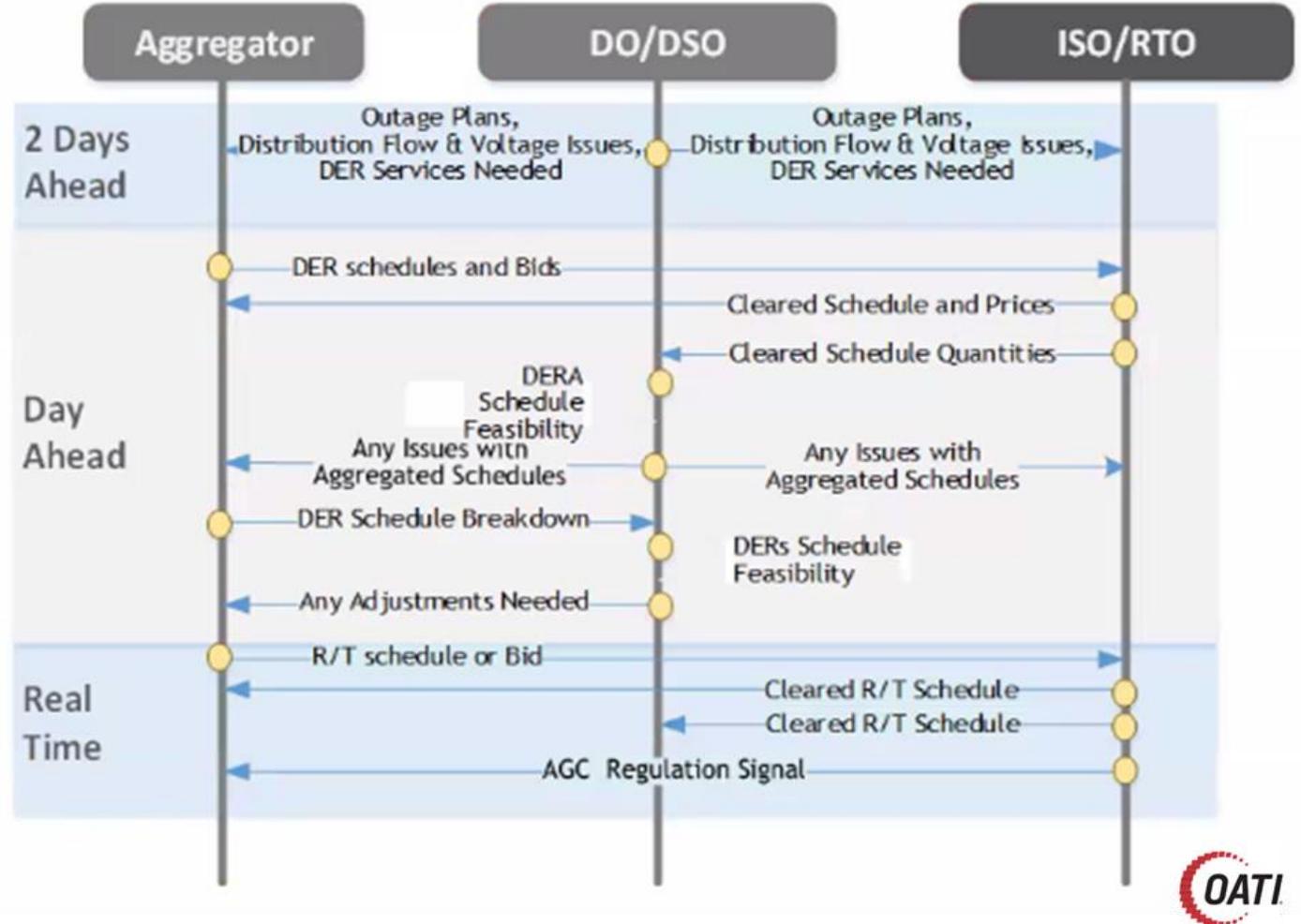


# RTO/ISO Compliance

- All six RTOs and ISOs largely complied with these coordination requirements, albeit with significant variations, and FERC has fully approved four of these compliance proposals.
- Key areas where FERC made specific changes and revisions to RTO/ISO proposals were on
  - The scope of the EDC review,
  - The length of EDC review of DER participation in DER aggregations, and
  - The level of detail on coordination processes contained in tariffs.



# EDC Coordination Requirements





# EDC Coordination Requirements

- Participation of DERs and DERAs in wholesale markets will also entail the development and implementation of EDC coordination processes.
- FERC Order 2222 does not contain any requirements about active coordination between EDCs and DERAs.
- EDCs need to work with relevant RTOs/ISOs and with DERAs to determine the coordination strategies needed at different stages (i.e., day-ahead, real-time) of DERA market participation.



# Timeline of EDC Coordination

- The coordination needs for EDCs by timeframe include:
  - **Day-Ahead.** For the day-ahead timeframe, EDCs will need transparent access to planned dispatch schedules during operational timeframes, ideally at the same time that DERAs receive these schedules from RTOs and ISOs. These dispatch schedules will involve the aggregation level dispatch between ISOs/RTOs and DER aggregators, as well as the device level dispatch instructions issued by DER aggregators to individual DERs.
  - **Intra-Day.** For the intra-day timeframe, EDCs will need to provide information to DERAs about unplanned outages or constraints that may impact deliverability of DER aggregations to ISO/RTO market.
  - **Real-Time.** During real-time operations, distribution overrides necessitated by unplanned outages or local distribution system issues must be addressed by EDCs, especially how these overrides are communicated to DERAs and ISO/RTO. Moreover, the speed of the communications of these overrides must be quick so DERAs can inform RTOs/ISOs that they cannot fulfill their schedules or allow DERAs to revise their schedules.



# Role of State and Local Regulators

- The role of state and local regulators is to set rules for EDC and DER aggregator coordination and communications, and perform oversight as needed.
  - **Coordination.** Rules guiding coordination should not be overly prescriptive, but instead set timelines, roles and responsibilities of parties, and penalties if rules are not followed.
  - **Communications.** Communications between DERs, DERAs, EDCs and RTOs/ISOs will perform the backbone of FERC Order 2222 implementation and DERA participation in RTO/ISO markets. Any communications between EDCs and RTOs/ISOs concerning their review of DERAs (and from RTOs/ISOs about dispatch) should also be guided by state and local direction. Communications between DERAs and EDCs will need to be set by state and local direction and rules.
- Only two states (Maryland and New Jersey), thus far, are examining communication issues in their review of FERC Order 2222 implementation.



# 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](mailto: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.