Organization of MISO States
Distributed Energy Resources Work Group
NAESB Concept Paper: DER Entity Registry
March 10, 2026

The Organization of MISO States DER Work Group (OMS DER Work Group) appreciates the opportunity to provide feedback to the NAESB Joint Wholesale Electric Quadrant (WEQ) and Retail Markets Quadrant (RMQ) Business Practices Subcommittees (BPS) regarding their Concept Paper on the creation of a DER Entity Registry and development of related NAESB Business Practice Standards.[1] For the past several years, OMS has prioritized DER integration and Order 2222 compliance,[2] collaborated with MISO and stakeholders at the MISO DER Task Force,[3] and conducted an annual OMS DER Survey to identify DER growth, operational challenges, and best practices.[4]

The topics in this concept paper mirror the concerns and priorities that OMS has identified in recent years. Specifically, OMS has found that a centralized repository of DER information and clear data-sharing standards is foundational to successful implementation of FERC Order No. 2222, as well as the broader landscape of retail and wholesale DER activities. Below, the OMS DER Work Group provides specific responses to the questions posed in NAESB Joint WEQ and RMQ BPS's Request for Informal Comments.

1. ***Would a centralized DER Entity Registry to identify and authenticate parties be beneficial? Why or why not?***

   Yes, the OMS DER Work Group strongly supports the creation of a centralized DER Entity Registry to identify and authenticate parties. There are, at best, significant coordination gaps between the various entities involved in DER activities and at worst coordination is nonexistent today. For example, communications among Electric Distribution Companies (EDCs), Relevant Electric Retail Regulatory Authorities (RERRAs), and Aggregators are often handled informally on a case-by-case basis through emails with no standard system or data-sharing procedures, nor any systematic way to verify the parties involved. A centralized DER Entity Registry that mutually authenticates parties would help establish a trust framework that can feed seamlessly into state-wide and/or regional-wide communication platforms. Moreover, a DER Entity Registry that is modeled after the successful NAESB Electric Industry Registry should have industry-wide buy-in and allow for data access controls and cybersecurity protocols needed for reliable grid operations and effective market participation.

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[1] NAESB Concept Paper: *Secure, Equitable Access to DER and Aggregation Data Through a Standardized Framework for DER Information Registries*, available at: https://www.naesb.org/pdf4/weq_rmq_bps021726reqcom_a1.docx.

[2] *See* OMS Strategic Priorities, available at: https://www.misostates.org/index.php/about/strategic-priorities.

[3] MISO DER Task Force, https://www.misoenergy.org/engage/committees/DERTF/.

[4] OMS DER Survey, https://www.misostates.org/index.php/work-products/other-materials.

2. ***Related to the DER Entity Registry specifically:***

    a. ***Are there any additional stakeholder registration categories that need to be supported? If so, please identify and provide an explanation.***

    The OMS DER Work Group would like to clarify that the registration category of "Aggregator" includes individual DERs of sufficient size that are participating as a single resource aggregation[5] and acting as their own aggregator.

    b. ***Are there any identified stakeholder registration categories that are not needed? If so, please identify and provide an explanation.***

    No, the OMS DER Work Group does not recommend removal of any of the proposed registration categories. However, we would like to stress the "Applicable Regulatory Authority" category is essential, as RERRAs will play a central role in FERC Order No. 2222 implementation.

3. ***Would NAESB Business Practice Standards to facilitate interoperability between existing and future DER and aggregation registries and other industry tools be beneficial? Why or why not?***

    Yes, the OMS DER Work Group believes that interoperability is paramount to unlock the full potential of DERs and avoid unnecessary costs as the industry expands and evolves. The NAESB Business Practice Standards will be crucial to establishing consistency in data formatting and interface structures that will allow information to flow across multiple systems and entities, replacing the ad-hoc manual processes currently in place.

    The OMS DER Work Group appreciates that the concept paper acknowledges the need for optionality in the standards to accommodate specific jurisdictional needs. Standards that enable coordination without sacrificing existing regulatory structures should be the goal.

4. ***Would the creation of a DER Entity Registry and the development of NAESB Business Practice Standards to facilitate interoperability be beneficial to:***

    a. ***Support broader integration of DERs and aggregations by industry? Why?***

    Yes. Aggregators exist in a regulatory gap where procedures and the necessary infrastructure are not always present. This leads to uncertainty and makes the interactions between parties inefficient. A DER Entity Registry and the corresponding NAESB Business Practice Standards would help close this gap by establishing clear identification and authentication of these parties, as well as setting up interoperability standards that ensure data between the parties can be shared and communicated effectively, efficiently, and with appropriate protections. This communication foundation will also be necessary for effectively tackling issues around operational coordination as DER penetration increases.

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[5] Per FERC Order No. 2222, Paragraph 185-186.

b. Help industry respond to FERC Order No. 2222, FERC Order No. 901, and/or needs for DER data? Why or why not?

Yes – FERC Order No. 2222 requires coordination between RTOs, aggregators, RERRAs, and EDCs. This demands the type of identification and authentication outlined in the concept paper. In tracking FERC Order No. 2222 and MISO's compliance, the OMS DER Work Group has seen a recurring theme from stakeholders on the need for standardized data and a centralized and secure platform to facilitate communication. OMS's immediate priorities regarding FERC Order No. 2222 are to establish clear procedures for enrollment and registration as well as data sharing and data reconciliation. These are complimentary items and progressing on these issues first will provide a foundation for addressing dispatch overrides, settlements, and real-time operational considerations. The DER Entity Registry and the corresponding NAESB Business Practice Standards proposed here directly serve OMS's priorities and ongoing work in these areas.

Regarding FERC Order No. 901, NERC has recently proposed revisions to MOD-032 Data for Power System Modeling and Analysis that will require communication of DER information between utilities, aggregators, and transmission planners. A DER Entity Registry will be especially important to mutually authenticate parties, allowing for trusted data exchange with entities (e.g., aggregators) that may not be subject to NERC requirements. Similarly, the NAESB Business Practice Standards can establish data standards that allow for efficient and accurate transmission planning processes.

Beyond these specific Orders, the OMS DER Work Group will note that its DER Survey routinely shows that utilities continue to see a need for state regulatory direction and the benefits of a common data-sharing platform. Many utilities are waiting for guidance from MISO and their RERRAs before investing in system upgrades, while other utilities may be making upgrades that will need to be integrated into new standards. NAESB action outlined in the concept paper will not only establish the framework for communication platforms that the OMS DER Work Group sees as necessary and timely, but can also catalyze action from utilities and RERRAs across the MISO footprint to coordinate efforts.

5. Please provide information about your organization's role in the electric industry (e.g., market operator, distribution utility, etc.).

OMS was established to represent the collective interests of state and local utility regulators in the MISO region and to facilitate informed and efficient participation in related issues. Members collaborate to share information and resources, debate and exchange ideas on policy issues, and communicate their viewpoints. While OMS strives for agreement, each member retains independence to express its unique positions and be heard through OMS comments and filings. OMS currently consists of 17 members across 15 states and the Canadian province of Manitoba.

6. ***Please provide any additional information, questions, or considerations that could provide guidance to the subcommittees in determining how to proceed.***

RERRAs must have a central role in DER coordination. As such, the DER entity registry, and any governance procedures involving the further development and administration of the registry and accompanying standards, should support this role. This aligns with FERC Order No. 2222, which explicitly recognized the vital role of RERRAs in developing interconnection rules, data sharing and metering requirements, dispute resolution, multi-use applications, and other areas.

In addition, the OMS DER Work Group wants to underscore that coordination between both retail and wholesale facing information streams is important. As such, the entity registry and interoperability standards should be designed with an awareness that data elements and entities that historically tend to be retail- or wholesale-specific both need to be accommodated for this coordination. In practice, this means that the DER entity registry should reflect end-use customer consent to provide necessary data, and other foundational retail underpinnings, in order to link this retail information on individual DER assets to their participation in wholesale markets. Moreover, as DERs increasingly provide services in both wholesale and retail markets, the registry and standards should accommodate multi-use applications in a way that allows for tracking and coordination necessary to prevent double-counting.

The OMS DER Work Group would also like to stress that as the NAESB entity registry and standards evolve, they do so in a way that complements existing and planned tools. For example, MISO's Locational Enrollment Service (LES) tool is in the process of being rolled out to support enrollments of aggregated resources, starting with existing DR products and expanding to DERs ahead of FERC Order No. 2222 implementation. The subcommittees should look to engage with RTOs/ISOs to understand their existing platforms and ensure the NAESB standards facilitate integration.

Finally, the OMS DER Work Group would like to emphasize that customer privacy and data protection need to be prioritized at all levels. The DER Entity Registry's authentication and data access should be designed consistent with this point, as well as ensure that downstream device registries can implement role-based access controls that gate access to data components appropriately.

The OMS DER Work Group appreciates the opportunity to provide the above feedback. The OMS DER Work Group encourages the subcommittees move forward with the registry and standards promptly, as solutions to these foundational issues will aid ongoing efforts on registration, enrollment, and data sharing, as well as unlock future progress on other issues (e.g., operational coordination).