Organization of MISO States
Distributed Energy Resources Work Group
NAESB Retail Electric Quadrant DER Registry Interoperability Model Business Practices
October 23, 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 the draft Retail Electric Quadrant (REQ) DER Registry Interoperability Model Business Practices (draft standard). In March 2026, the OMS DER Work Group submitted comments to the subcommittees on the creation of a DER Entity Registry and development of related NAESB Business Practice Standards to support interoperability between registries.[1] The RMQ-specific draft standard considered here is a meaningful first step towards registry interoperability that the OMS DER Work Group supports. Further, the OMS DER Work Group encourages the subcommittees to leverage this initial work into a complementary WEQ standard, with the ultimate goal of reengaging on the creation of a DER Entity Registry.

OMS continues to prioritize DER integration and implementation of FERC Order No. 2222. Through working with MISO and stakeholders at the MISO DER Working Group, OMS has consistently heard that ad-hoc information exchange and inconsistent data among Electric Distribution Companies, aggregators, Relevant Electric Retail Regulatory Authorities, and MISO are significant barriers to implementation. A common data dictionary would help begin to address these concerns. However, the OMS DER Work Group believes this work must expand to consider a complementary WEQ standard so that registration systems at the wholesale level can map to the REQ data dictionary. In absence of a WEQ standard – or as an initial first step – the OMS DER Work Group would encourage the subcommittees to seek input from RTOs/ISOs on their planned registration data requirements in order to establish some cross-reference to facilitate such mapping.

Below the OMS DER Work Group provides general feedback on the draft standard.

OMS Supports the Draft Standard

The OMS DER Work Group supports the draft standard and understands the need to prioritize the underlying standard before further considering a DER Entity Registry. The OMS DER Work Group appreciates that the draft standard is voluntary and expressly recognizes that any obligation to use it would be established by the Applicable Regulatory Authority. Our March comments emphasized the importance of optionality to accommodate specific jurisdictional needs and the draft standard reflects that principle. As such, the OMS DER Work Group supports the statements that: i) processes for registering DER and sharing information should be consistent with and are subject to the requirements set forth by the Applicable Regulatory Authority (REQ.28.1.2); and ii) an Applicable Regulatory Authority can create or modify a DER registry (REQ.28.3.1.1). These statements importantly recognize that some states may choose to establish their own registry or otherwise specify their own requirements.

[1] *OMS DER Work Group Feedback*, NAESB Concept Paper: DER Entity Registry and Business Practice Standards (March 10, 2026), available here.

Proposed Definitions and Principles

The OMS DER Work Group believes the definition in REQ.28.2 of Distributed Energy Resource as "a generator or energy storage technology" could be viewed as excluding commonly used DERs such as demand response or electric vehicles. If the definition is retained, the OMS DER Work Group recommends clarification elsewhere that the data dictionary is intended to accommodate the full range of DER resources. The OMS DER Work Group would also suggest including definitions for DER Aggregator (or third-party aggregator) and System Operator, as those terms are used throughout the draft standard.

Our March comments stressed the importance of customer privacy and data protection. Accordingly, the OMS DER Work Group recommends including an additional principle in REQ.28.1 stating that the processes for sharing customer-specific DER information should recognize customer consent and any data privacy requirements set forth by the Applicable Regulatory Authority.

Data Sharing and Data Dictionary

The OMS DER Work Group supports the recommendation for multi-factor authentication (REQ.28.3.2.2) and using role-based access controls (REQ.28.3.2.3), consistent with our March comments. Likewise, we appreciate the use of an asterisk denoting fields that may need to be anonymized or otherwise masked prior to sharing (REQ.28.3.1.6). While fields like Utility Account Number and DER Serial Number appropriately feature an asterisk, many customer specific fields like customer names, addresses, and phone numbers are not labeled with an asterisk. The OMS DER Work Group would request all fields in the Owner/Contact category be labeled with an asterisk.

The OMS DER Work Group also recommends the subcommittees consider adding the following data fields:

1) Applicable Regulatory Authority – to specify the regulatory authority with jurisdiction;
2) Retail Program Enrollment Status – to support multi-use coordination and prevention of double-counting; and
3) DER Aggregation ID and/or DER Aggregator ID – to link individual DERs to the aggregation/aggregator through which they participate.

Next Steps

The OMS DER Work Group understands the decision to develop an RMQ-specific standard based on existing standards. However, as stressed in the introduction and in our March comments, coordination between retail and wholesale information streams is critically important. Information in this data dictionary can ultimately support wholesale registrations, such as through MISO's Locational Enrollment Service (LES) tool. We encourage the subcommittees to consider a complementary WEQ standard or cross-reference so that registration systems like MISO's LES tool can map to the proposed data dictionary.

The OMS DER Work Group also supports a DER Entity Registry to identify and authenticate the parties involved in communications around DER information. As such, we encourage the

subcommittees to resume work on a DER Entity Registry after adoption of these standards. The OMS DER Work Group continues to hear that many utilities are waiting for guidance before investing in system upgrades and clear standards and an Entity Registry can help catalyze coordinated action.

The OMS DER Work Group appreciates the opportunity to provide this feedback and commends the subcommittees on their progress. We encourage the subcommittees to move forward with adoption of the draft standard and look forward to continued participation in future efforts on related standards and a DER Entity Registry.