



MISO Response to RASC: Deliverability in Accreditation (RASC-2019-2) (20250820)

Resource Adequacy Subcommittee
September 2025

Purpose & Key Takeaways



Purpose:

Review stakeholder feedback regarding MISO's proposal for addressing the accreditation of co-located resources under the Direct Loss of Load (DLOL) methodology.

Key Takeaways:

- MISO received nine (9) feedback submissions on this topic:
 - Seven (7) submissions expressed support for MISO's proposal, particularly the option to allow Market Participants to select which co-located resource of a grouping to prioritize for accreditation.
 - Two (2) submissions did not express an opinion on the proposal but offered suggestions for MISO to consider.
 - There were several questions seeking clarification on specific implementation details of the proposal.
- MISO will return to the November RASC to continue the discussion with stakeholders regarding co-located resource accreditation.

General Support for MISO's Proposal for Accrediting Co-Located Resources under the Direct Loss of Load (DLOL) Methodology

Stakeholder Comments	MISO Response
We support MISO's proposal for the accreditation of co-located resources under the DLOL methodology (Schedule 53A).	Thank you for your feedback.
We support MISO's proposal to calculate ISAC separately for each co-located resource within a grouping by accounting for aggregate deliverability and Interconnection Service. We appreciate the thoughtful approach MISO has taken and believe this initiative will provide needed clarity and consistency in resource accreditation.	
We support treating ISAC for individual co-located resources separately while limiting availability based on aggregate IS on an hourly basis. This approach best reflects real-world operations, allows Market Participants to optimize performance, and provides greater accreditation to resources with multiple units feeding into one node, which increases overall reliability.	

Feedback in Support of the Option in MISO's Proposal Allowing Market Participants to Select the Co-Located Resource to Prioritize

Stakeholder Comments	MISO Response
We support MISO's option to allow Market Participants to select which individual co-located resource at a single point of interconnection to prioritize for ISAC calculations.	Thank you for your feedback.
We are supportive of Option #2 (MP-Selected Resource Priority) that allows MPs to assign deliverability and prioritize resources for accreditation. We believe this is a more accurate representation of the RT availability of the site.	
We encourage MISO to include the option to allow Market Participants to select which individual co-located resource of a single grouping to prioritize for ISAC calculations. It is important to provide the resource with the highest accredited value the option to maintain that individual accreditation value at the interconnect. It also provides a way for co-located resources that are two separate market participants to determine who will be given priority for capacity accreditation.	
We support MISO's proposal of allowing Market Participants to choose whether to use a pro rata reduction to offers of the individual units or to prioritize the hourly offers of a single unit identified by the market participant.	
It is our view that Market Participants should have the option to select either Option 1 (Pro Rata Reduction to Offers Based on Magnitude for ISAC Calculations) or Option 2 (Offers of MP-Selected Resource Prioritized for ISAC Calculations) to calculate ISAC. We do not see any issue with allowing Market Participants to select between these two options given that total ISAC generated by the co-located resources is approximately the same; the difference is only between the amount of ISAC generation attributed to each resource.	

Questions and Concerns Regarding the Calculation of Availability

Stakeholder Comments	MISO Response
We are concerned about how MISO will know the uncapped availability of two intermittent resources. For example, with co-located wind and solar resources where the availability is measured by generation output, how would MISO determine actual availability if one or the other is curtailed?	The hourly uncapped availability of a wind or solar Dispatchable Intermittent Resource (DIR) will account for any MISO-instructed curtailments as MISO has communicated during the design discussions for Direct Loss of Load (DLOL) based accreditation.
We would like to point out that MISO's proposal specifies using "actual historical offers/performance in the Real-Time Energy Market is the basis for individual ISAC," but this specification could be problematic for Dispatchable Intermittent Resources (DIRs) during times when MISO limits their output. In the RT Energy Market, DIRs may either use their own forecast of maximum output or one provided by MISO. We presume that "performance" in the MISO specification for accreditation generally means actual output of DIRs when MISO does not limit them. But for cases when MISO limits the output, the capability values used need to be carefully considered. Will there be checks to ensure that high MP-provided forecasts are not unjustifiably increasing their accreditation? Are participants that allow MISO to forecast their maximum output willing to have that forecast determine their availability?	
We are seeking confirmation from MISO staff that for intermittent resources (DIRs) under Option 1, is ISAC based exclusively on actual output/performance, or does MISO base the ISAC calculation on real time energy offers from the DIR?	

Concerns with How Market Behavior Impacts Co-Located Resource Accreditation

Stakeholder Comments	MISO Response
MISO must clearly separate the economic dispatch of energy from the accreditation of capacity. Participation in day-ahead and real-time markets reflects economic decisions made by market participants (MPs), while capacity accreditation should reflect a resource's ability to deliver energy during system stress. To uphold market efficiency and avoid unnecessary overbuilding, for co-located resources MISO should decouple day-ahead and real-time offers from accreditation, use historical data to estimate hourly deliverable energy during stressed periods until such time the interconnection service limit can be implemented, and apply the Schedule 53A framework to determine maximum ISAC based on potential contribution, not market behavior.	MISO agrees and acknowledges that the accreditation approach is completely separate from the economic dispatch of resources in the Energy Markets. MISO would like to also point out that FERC has approved MISO's accreditation method that uses operational performance (market offers/real-time availability) for Intermediate Seasonal Accredited Capacity (ISAC) calculations. MISO's proposal only addresses the capacity accreditation approach for co-located resources for the Direct Loss of Load (DLOL) and Schedule 53A methodologies that will be in effect starting with the 2028-2029 Planning Year. Conversations regarding the Interconnection Service limit are taking place at the Market Subcommittee (MSC) with an anticipated implementation date prior to DLOL and Schedule 53A. Until the Interconnection Service limit is in place, Market Participants are expected to self-manage their offers as per the Tariff and Interconnection Agreement such that, in aggregate, they do not exceed shared Interconnection Service.

Miscellaneous Co-Located Resource Accreditation Questions and Concerns

Stakeholder Comments	MISO Response
We are concerned that CROW tickets and exemptions have not been incorporated into this approach, even though exemptions can significantly impact accreditation.	All resources assigned to a Resource Class will be eligible for planned outage exemptions as per Schedule 53A.
We also request clarification on whether this methodology is tied to DLOL accreditation or current accreditation methods. Will implementation occur only with DLOL, or earlier? If implemented earlier, inconsistent accreditation approaches could create inequities (e.g., solar and wind accredited based on specific hours, while Schedule 53 units use a 3-year hourly average).	MISO's proposal is specific to DLOL and Schedule 53A and would not be implemented prior to the Planning Year 2028-2029 Planning Resource Auction (PRA).
We recommend considering a separate class average for hybrid resources. Without this, pairings such as solar + gas may consistently under-prioritize the solar component, which could depress the solar class average over time.	MISO has already included Resource Classes in Schedule 53A which has been approved by FERC for implementation in Planning Year 2028-2029. MISO will continue to monitor the changes in its generation fleet to evaluate if the Resource Classes established in Schedule 53A of the Tariff need to be updated. MISO will also work with stakeholders to determine whether additional Resource Classes should be established in the future as new technologies emerge and as MISO gains experience with the performance of resources under the DLOL-based methodology and insights into their performance in the Energy Markets.
Has MISO considered how co-located and hybrid resources will be represented in the LOLE model?	MISO is evaluating approaches for representing co-located and hybrid resources in the LOLE model and will share more details with stakeholders at future Resource Adequacy Subcommittee (RASC) and Loss of Load Expectation Working Group (LOLEWG) meetings.