

# Order No. 2222 Conforming Changes



*Discussion on Order No. 2222 conforming changes to OP-8, OP-14, and OP-23*

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# Order No. 2222 Conforming Changes – OP-8, OP-14, and OP-23

Proposed Effective Date: By 09/30/2026

- FERC Order No. 2222 requires ISO/RTO markets to allow Distributed Energy Resource Aggregations (DERAs) to participate in wholesale electricity markets
- A DERA is an aggregation of one or more Distributed Energy Resources (DERs) that are located on the distribution system or behind a retail customer meter and may include:
  - Demand response
  - Settlement-only generation
  - Energy storage
  - Hybrid or mixed-technology aggregations
  - Other distribution-connected or behind-the-meter resources
- The ISO filed its [compliance package](#) on February 2, 2022
  - The ISO has identified the need for conforming changes to OP-8, OP-14, and OP-23 ahead of November 1, 2026 implementation
  - The proposed Operating Procedure changes are intended to align existing operational requirements with the new DER Aggregation participation framework while maintaining reliable system operations

## OP-8 Redline Overview

Proposed Effective Date: By 09/30/2026

- The purpose of OP-8:
  - This Operating Procedure (OP) sets forth criteria for the establishment and administration of Operating Reserve and Regulation in the New England Reliability Coordinator Area/Balancing Authority Area (RCA/BAA)
  - The objective is to ensure that the New England RCA/BAA Bulk Electric System (BES) is operated at the level of reliability prescribed in North American Electric Reliability Corporation (NERC), NPCC and ISO New England (ISO) criteria
- A periodic review of OP-8 was performed to identify the need to make any potential changes
  - Conforming changes due to Order No. 2222 are needed

# OP-8 Proposal

- The following changes to OP-8 are proposed:
  - Revisions to Part II – Definitions
    - Ten-Minute Non-Spinning Reserve (TMNSR), Ten-Minute Spinning Reserve (TMSR), and Ten-Minute Operating Reserve (TMOR) revised to include Demand Response Distributed Energy Resource (DRDERA) as part of Order No. 2222

# OP-8 Part II – Definitions

| Section                          | Procedure Change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Reason for Change                                                                |
|----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|
| <p>Part II –<br/>Definitions</p> | <p><b>Ten-Minute Non-Spinning Reserve (TMNSR)</b> - is the reserve capability of:</p> <ul style="list-style-type: none"> <li>(1) a generating Resource that can be converted fully into energy within ten minutes from the request of the ISO;</li> <li>(2) a Dispatchable Asset Related Demand (DARD) that can be fully utilized within ten minutes from the request of ISO to reduce consumption; or</li> <li>(3) a Demand Response Resource (DRR) <u>and a Demand Response Distributed Energy Resource (DRDERA)</u> that can provide demand reduction within ten minutes from the request of the ISO.</li> </ul> <p><b>Ten-Minute Spinning Reserve (TMSR)</b> - is the reserve capability of:</p> <ul style="list-style-type: none"> <li>(1) a generating Resource that is electrically synchronized to the New England Transmission System that can be converted fully into energy within ten minutes from the request of the ISO;</li> <li>(2) a DARD that is electrically synchronized to the New England Transmission System that can reduce energy consumption to provide reserve capability within ten minutes from the request of the ISO; or</li> <li>(3) a <del>Demand Response Resource</del> <u>DRR and a DRDERA</u> that has been dispatched that can provide demand reduction within ten minutes from the request of the ISO for which none of the associated Demand Response Assets have a generator whose output can be controlled located behind the Retail Delivery Point other than emergency generators that cannot operate electrically synchronized to the New England Transmission System.</li> </ul> <p><b>Thirty-Minute Operating Reserve (TMOR)</b> - is the reserve capability of:</p> <ul style="list-style-type: none"> <li>(1) a generating Resource that can be converted fully into energy within thirty minutes from the request of the ISO;</li> <li>(2) a DARD that can be fully utilized within thirty minutes from the request of the ISO to reduce consumption; or</li> <li>(3) a DRR <u>and a DRDERA</u> that can provide demand reduction within thirty minutes from the request of the ISO.</li> </ul> | <p>TMNSR, TMSR, and TMOR revised to include DRDERA as part of Order No. 2222</p> |

# OP-14 Redline Overview

Proposed Effective Date: By 09/30/2026

- The purpose of OP-14:
  - This Operating Procedure (OP) describes the minimum technical requirements for defined generator units described in Section II.A.2 of this OP which are referred to as “Generators” for purposes of this OP, Settlement Only Resources/Generators (SOGs), Alternative Technology Regulation Resources (ATRRs), Asset Related Demands (ARDs) , Demand Response Resources (DRRs), Demand Response Distributed Energy Resource Aggregation (DRDERAs) and Continuous Storage Facilities (CSFs) under the control/jurisdiction of ISO New England Inc. (ISO)
- A periodic review of OP-14 was performed to identify the need to make any potential changes
  - Conforming changes due to Order No. 2222 are needed

# OP-14 Proposal

- The following changes to OP-14 are proposed:
  - Revision to Section I.A – Background
    - Added Demand Response Distributed Energy Resource Aggregation (DRDERAs)
  - Revision to Section II.A – Generator Defined
    - Added footnote regarding implementation of MOD-026-2
  - Revision to Section VI
    - Updated title to include DRDERAs

# OP-14 Section I.A – Background

| Section                  | Procedure Change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Reason for Change                                                       |
|--------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------|
| Section I.A – Background | <p><b>I. INTRODUCTION</b></p> <p><b>A. Background</b></p> <p>1. This Operating Procedure (OP) describes the minimum technical requirements for defined generator units described in Section II.A.2 of this OP which are referred to as “Generators” for purposes of this OP, Settlement Only Resources/Generators (SOGs), Alternative Technology Regulation Resources (ATRRs), Asset Related Demands (ARDs)<sup>1</sup>, Demand Response Resources (DRRs), <u>Demand Response Distributed Energy Resource Aggregation (DRDERAs)</u> and Continuous Storage Facilities (CSFs) under the control/jurisdiction of ISO New England Inc. (ISO). For the purposes of this OP, “under the control/jurisdiction of ISO” is defined as:</p> | Added Demand Response Distributed Energy Resource Aggregation (DRDERAs) |



# OP-14 Section II.A – Generator Defined

| Section                          | Procedure Change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Reason for Change                                    |
|----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| Section II.A – Generator Defined | <p><u><sup>6</sup> MOD-026-1 and MOD-027-1 were retired, and MOD-026-2 went into effect on April 1, 2026. With the updates to MOD-026-2, the earliest effective date for any requirement of MOD-026-2 is April 1, 2027. The ISO is working on updates to model submission and review requirements in accordance with MOD-026-2. Until those changes are documented, a generator may submit updated dynamic data using DDMS, but per the implementation plan for MOD-026-2, the ISO may take up to 365 days to perform a review of the submitted data.</u></p> | Added footnote regarding implementation of MOD-026-2 |

# OP-14 Section VI

| Section    | Procedure Change                                                                                                                                                        | Reason for Change                |
|------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|
| Section VI | VI. TECHNICAL REQUIREMENTS FOR DEMAND RESPONSE RESOURCES (DRRs), <u>INCLUDING THE DRR PORTION OF DEMAND RESPONSE DISTRIBUTED ENERGY RESOURCE AGGREGATIONS (DRDERAs)</u> | Updated title to include DRDERAs |

# OP-23 Redline Overview

**Proposed Effective Date: By 09/30/2026**

- The purpose of OP-23:
  - This ISO New England Operating Procedure No. 23 - Resource Auditing (OP-23), describes the methods by which ISO verifies certain resource capabilities including:
    - Ten- and thirty-minute off-line reserve capability
    - Seasonal Claimed Capability (SCC)
    - Reactive capability
- A periodic review of OP-23 was performed to identify the need to make any potential changes
  - Conforming changes due to Order No. 2222 are needed

# OP-23 Proposal

- The following changes to OP-23 are proposed:
  - Revision to Section II.A – Fast Start Reserve Auditing
    - Added Demand Response Distributed Energy Resource Aggregation (DRDERA) to scope
  - Revision to Section III.B – Demand Response Resources (DRRs)
    - Added the DRR portion of a DRDERA to scope

# OP-23 Section II.A – Fast Start Reserve Auditing

| Section                                                       | Procedure Change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Reason for Change            |
|---------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|
| <p>Section II.A –<br/>Fast Start<br/>Reserve<br/>Auditing</p> | <p><b>II. RESERVE AUDITING</b></p> <p><b>A. FAST START RESERVE AUDITING</b></p> <p>1. Economic Dispatch Fast Start Reserve Audit</p> <p>a. When a Fast Start Generator or Fast Start Demand Response Resource, <u>or Fast Start DRDERA</u> receives an electronic dispatch signal to start (including a Market Participant-requested fast start off-line reserve audit):</p> <ol style="list-style-type: none"> <li>(1) The resource shall respond to the dispatch signal in accordance with its Supply Offer.</li> <li>(2) ISO shall evaluate the Resource response to the dispatch signal in accordance with Section III of the ISO New England, Inc. Transmission, Markets, and Services Tariff (Tariff), (Market Rule 1 - Standard Market Design).</li> <li>(3) Response to these dispatch signals is used to adjust the CLAIM10 or CLAIM30 value for each resource as described in Section III.9.5 of the Tariff - Forward Reserve Resources.</li> </ol> | <p>Added DRDERA to scope</p> |
|                                                               | <p>b. For Demand Response Resources (DRRs):</p> <ol style="list-style-type: none"> <li>(1) The Lead MP may request that the fast start reserve capability of a DRR, <u>including the DRR portion of a DRDERA</u>, be audited by submitting a request through the Demand Response Audit and Testing Tool (DRATT) software.</li> <li>(2) <u>In order to</u> modify or rescind a request to perform a fast start reserve audit the following shall be performed:</li> </ol>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                              |

# OP-23 Section III.B – Demand Response Resources (DRRs)

| Section                                          | Procedure Change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Reason for Change                          |
|--------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|
| Section III.B – Demand Response Resources (DRRs) | <p><b>B. Demand Response Resources (DRRs)</b></p> <ol style="list-style-type: none"><li>1. A Seasonal DR Audit is a demonstration of the capability of a DRR, <u>including the DRR portion of a DRDERA</u> that may be achieved through normal dispatch or through an audit request in the DRATT software and shall be conducted in accordance with Section III.1.5.1.3.1 of the Tariff. A specific request by the Lead MP is <b>not</b> necessary if the Seasonal DR Audit is performed by the designation of a period of dispatch after the fact.</li><li>2. The notification by a Lead MP of past performance shall include the date and time period of the demonstration to be used.</li></ol> | Added the DRR portion of a DRDERA to scope |

# Conclusion

- The ISO has identified the need for conforming changes to OP-8, OP-14, and OP-23 ahead of Order No. 2222 implementation
  - The proposed changes to OP-8: revised Part II
  - The proposed changes to OP-14: revised Part A in Sections I and II, and title of Section VI
  - The proposed changes to OP-23: revised Part A in Section II and Part B in Section III
- Proposed effective date: by 09/30/2026

# Stakeholder Schedule

| Stakeholder Committee and Date              | Scheduled Project Milestone         |
|---------------------------------------------|-------------------------------------|
| Reliability Committee<br>July 23, 2026      | Review Changes and Answer Questions |
| Reliability Committee<br>August 19, 2026    | Answer Questions and Vote           |
| Participants Committee<br>September 3, 2026 | Vote                                |



# Questions



# About the Presenter

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