

December 12, 2025

Western Resource Adequacy Program
c/o Western Power Pool
7525 NE Ambassador Place, Suite M
Portland, Oregon, 97220

WRAP Participants and Program Staff,

The undersigned organizations are highly supportive of and impressed by the strides WRAP has made in developing a regional view of resource adequacy and allowing its participants to more efficiently maintain reliable service for their customers. Having participated in the program's development, both directly and indirectly, we appreciate the scale and significance of WRAP and remain committed to supporting its full development into operations. Our organizations submit this request in light of what we see as a gap in the program which, when resolved, will more accurately value the resource adequacy contributions of transmission infrastructure consistent with the value it provides.

We request the WRAP launch a task force to adapt its Business Practice Manuals and/or Tariff language to attribute capacity value to certain transmission lines themselves, sufficient to qualify as a resource and receive credit in the FS Capacity Requirements. As currently designed, the WRAP program only values transmission insofar as it enables deliverability of Qualifying Resources to satisfy the FS Capacity Requirement as described in the FS Transmission Requirement (BPM 108, 3.1.4). Qualifying Resources sufficient for inclusion in the FS Capacity Requirements so far only include assets traditionally classified or treated as generators (e.g. hydro, wind, solar, gas, coal, storage, DR, BTM; BPM 105). We find certain transmission lines provide substantially equivalent, quantifiable capacity benefits for purposes of WRAP in virtue of participants' access to the load and resource diversity enabled by these transmission lines. We and our colleagues have thoroughly demonstrated this attribute of transmission lines, particularly those which cross multiple jurisdictions, in the linked materials attached below. Furthermore, certain utilities, such as Idaho Power, have included transmission's resource adequacy value in resource planning as a utility best practice.

We acknowledge consideration of transmission's capacity value in this way may introduce new challenges to WRAP's assessment of resource adequacy (i.e. WRAP may need to account for certain regional/subregional transmission constraints not currently modeled). Despite such challenges, we believe appropriately attributing a resource adequacy value to certain transmission lines themselves more accurately reflects utilities' utilization of the transmission system, the value of transmission to the region, the realities of real-world operations, and utility resource modeling best practice.

Sincerely,

GridLab

/s/ Casey Baker

Renewable Northwest

/s/ Kyle Unruh

Interwest Energy Alliance

/s/ Ben Fitch-Fleischmann

Attached:

Astrape Consulting (May 2024): [North Plains Connector \(NPC\) Evaluation](#)

Telos Energy (April 2025): [Transmission as a Capacity Resource](#)

Grid Strategies (June 2025): [Resource Adequacy Value of Interregional Transmission](#)