



Western Resource Adequacy Program

RAPC Meeting

May 26, 2022 10-11:30am

Participant	Name	Participant	Name
APS	Brian Cole	NorthWestern	
Avangrid	Jeff Pritchard	NV Energy	Ryan Atkins
Avista		PacifiCorp	Zach Kanner
Basin Electric	Garrett Schilling	PGE	Dee Outama
Black Hills	Eric Scherr	Powerex	Mike Goodenough
BPA	Suzanne Cooper	PSE	Phil Haines
Calpine	Bill Goddard	SRP	Grant Smedley
Chelan	Shawn Smith	Seattle	Emeka Anyanwu
Clatskanie		Shell	
Douglas	Jeff Johnson	SnoPUD	Jeff Kallstrom
EWEB		Tacoma	Ray Johson
Grant	Rich Flanigan	TEA	Ed Mount
Idaho	Ben Brandt – joined at 10:19	TID	Dan Severson – joined at 10:23

Objectives

1. Provide the RAPC with updates on project progress.
2. Seek RAPC input on progress and any administrative actions

Meeting Agenda

Call to Order	
10:00	<ol style="list-style-type: none"> 1. Attendance 2. Agenda Overview <i>Agenda approved unanimously at 10:09</i> 3. Approve Minutes from last meeting <i>Minutes approved unanimously at 10:10</i>
PA/PO Report	
10:10	<ol style="list-style-type: none"> 1. PO Update <i>Freeze date on Ops design of June 3rd (means changes after this date will need further consideration of impact to schedule or to functionality provided for Summer 23 Operations Program Trial)</i> <i>Discussion on technical specifications and participant technology needs</i>



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External Affairs	
	No updates
Ongoing Business	
10:23	2. Binding Transition Proposal <i>Discussion on proposal – may need a survey about when participants can do binding</i>
	3. Participation Proposal <i>Proposal approved as edited unanimously at 11:21 WPP will follow up with Shell on one edit not accepted</i>
	4. FERC Filing Schedule <i>Aiming to file with FERC by early July – more discussion at RAOC on intermediate steps</i>
New Business	
11:23	4. FS Modeling Outputs Discussion <i>Additional discussion at next week's RAOC meeting</i>
	5. Additional Comments Received on Tariff
Upcoming	
11:29	6. Continued WRAP filing packet review
Adjourn	

Current 3A Participants: APS, Avangrid; Avista; Basin Electric*; Black Hills; BPA; Calpine; Chelan; Clatskanie*; Douglas; EWEB*; Grant*; Idaho Power; NorthWestern; NV Energy; PacifiCorp; PGE; Powerex; PSE; SRP; SCL; Shell; SnoPUD; Tacoma Power; TEA; TID

*opted out of OC/work group participation



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Participation – Proposal

Steve Bellcoff, Edison Elizeh - BPA	Ian White - Shell
Bill Goddard - Calpine	Jeff Johnson - Douglas
Mark Holman, Mike Goodenough – Powerex	Shawn Smith - Chelan
Michael O'Brien - PGE	Tyler Moore - APS
Phil Haines - PSE	Josh Steiner - SRP
Matt Binette, Paul Flynn – W&T	Rebecca Sexton, Ryan Roy, Lisa Hardie - WPP

Background

Participants may decide to approach the WRAP with a variety of circumstances, and the program aims to be flexible in the participation model to accommodate many modes of participation without impacting the reliability of the region.

This question has arisen in a variety of circumstances, specifically including cost allocation, voting and governance, compliance with the FS program, and participation in the Ops program.

Participation in program governance and decision making can be differentiated from participation in the FS and operations program.

Aggregating Loads

Various load serving entities could decide to aggregate under a single LRE acting as an agent for those loads for the purposes of program governance. In this case, they will identify an agent and will agree (outside of the program) as to how that agent will work on their behalf. Alternatively, an LRE acting on its own behalf may bring into the program one or multiple loads for which it has contractual responsibility or obligation associated with that load. In either case, the aggregating LRE will sign the Western Resource Adequacy Agreement and will perform the governance responsibilities for the program.

Excluding Loads

LREs will be required to show the PO all loads for which they are responsible (for purposes of the WRAP/this document, "responsible" will be understood as: all loads within the Western Interconnect for which they are the LSE or the exclusive wholesale electricity provider to the LSE, which are not participating in another RA program). However, some LREs may not be able to participate in the program on behalf of all load for which they are responsible; a load exclusion process will be provided to enable such LREs to participate with the load for which they are able.

The exclusion process is intended for discrete loads served by disparate LSEs and/or in disparate balancing authority areas (BAAs), for example: third-party, self-supply, consumer choice loads. Loads served by a single LSE in a single BAA may not be partially excluded.



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Importantly, the load exclusion process does not leave load participation (or exclusion) to the discretion of the LRE, so as not to open a program loophole whereby LREs are able to manipulate their program obligations. Loads seeking an exclusion will complete an attestation (template to be provided, language to be carefully considered) requesting exclusion from the program and indicating a mutual understanding (between LRE and customer of the potential reliability impacts of not participating in the WRAP (increased likelihood of unserved energy). [It is recommended for customer to inform the balancing authority the load resides in on such action]

FS Program

LREs will list all loads, including excluded load, for which they are responsible in their FS Workbook(s). LREs seeking to exclude some of their load will note such in the workbook and provide the requisite exclusion documentation (template to be provided) at the time of the Forward Showing. Excluded loads will not be included when determining an LRE's FS Capacity Requirement.

It is likely some LREs will be bringing loads that are geographically distinct or separated by constrained transmission paths or loads and resources that are not operated collectively. In order to maintain the reliability metric for the region, these loads must not be treated as though they can share in load and resource diversity when that is not the case.

Therefore, load submitted by an LRE within a single FS workbook must be able to be interchangeably served by all resources in that same workbook without the expectation of needing to procure additional transmission rights between load locations across constraints during sharing events.

If an LRE cannot serve its stated load with a common set of resources, these separate/distinct loads that are unable to be served via a common set of resources must be submitted in separate FS workbooks. LREs must submit individual FS workbook for each unique, uncoordinated load or resources (those unable to share diversity due to operational/practical constraints). When submitting the FS workbook, participants' officers will attest that the resources and transmission are properly accounted for and also to the above being true for each workbook they submit.

Each workbook will have its own monthly FS capacity requirement assigned, and those requirements must be met individually and separately from any other submitted workbooks.

To aid LREs in assessing whether one or more workbook is appropriate for the geography, deliverability, and operations of their resource and load mix, we plan to provide:

1. A process for participants seeking guidance from the Program Operator on their proposed aggregation / disaggregation approach.
2. A set of general guidelines to be used by participants on to help formulate an approach to aggregation / disaggregation.
- 3.



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Ops Program

The Ops Program will have an instance of the sharing calculation for each FS workbook that is submitted. If an LRE acting as an agent for two separate and distinct loads submits two FS workbooks, then there will be two separate sharing calculations requiring separate inputs and generating separate results.

The Ops program mandates a single 24x7 contact number for issues but there is potential flexibility in who submits the data necessary to complete each of the sharing calculations, who the scheduling tagging agent is for holdback and delivery, access to the Ops Program online tool etc. These issues are being addressed with the Program Operator.

Load that has been excluded is not eligible to participate in the Ops Program. The PO will have the ability to inquire and verify inputs to the Ops Program to ensure the operations program was appropriately informed. If it is found that an LRE was unable to deliver their holdback requirement due to 1) serving load which was excluded from FS with program related resource or 2) participant submitting excluded load in the Ops Program, that participant will no longer be eligible to exclude load in future forward showing submittals; non-delivery penalties would apply at the maximum threshold (i.e. as if this was the LRE's 3rd failure).

Calculation of P50 (for Purposes of Cost Allocation and Voting)

A P50 peak load will be established for both seasons for each FS Workbook submitted, per the standard program guidance provided for the establishment of such a metric. For the purposes of cost allocation and voting, an LRE's program P50 load will be the sum the higher of the two seasons' P50 loads from each of the workbooks. The P50 load will not include any excluded loads. Of course, LREs may split this single per-participant fee amongst aggregated loads, but that would be done outside of the program.

Program Governance

The LRE will always receive one senate vote. All LREs may divide their house vote as desired to reflect their loads; the total house vote cast will always equal the LRE's total P50 load in the program.

Though most RAPC meetings will be open to the public, only the identified LRE will participate in closed RAPC meetings (though they may relay anonymized summaries of the closed meetings to their constituent loads – same rules apply for COSR staff rep).

It should also be noted that each company may hold no more than one senate seat (i.e., participants cannot sign the WRAA twice, cannot acquire two senate seats by paying the per-participant fees twice).

Examples of Participation Configurations

All of the examples below could be Load Responsible Entities in the WRAP. These are not exhaustive but are illustrative of how entities in various situations might participate.

1. An LRE (happens to also be an LSE) has load in Montana and Oregon.

These two loads are served by different resources and have minimal/no transmission between them.

FS: The LSE submits two FS workbooks (with distinct load and resource information) and must meet a separate FS capacity requirement (P50+PRM) with distinct resources demonstrated in each.

Ops: The resources and load in each workbook are accounted for in two separate sharing calculations. The LSE provides data for each set of resources/load to facilitate the operations program's calculations; they may elect to provide two 24x7 contacts, one for each sharing calculation.

Governance: When they vote, the LSE receives a single senate vote and a house vote accounting for the sum of the two winter P50 peak loads / the region's total NCP P50 load. A single voice represents them in RAPC discussions, though they may choose to divide their house vote, but that would be done outside of the program.

Cost: The LSE pays one per-participant fee and pays a load-based fee based on the sum of their two winter P50 peak loads (NCP of their two loads).
2. A marketer serves retail access load for four customers/four loads across three different states.

The customers are responsible for their own resource procurement and have minimal/no transmission between them; they are not operated collectively/to realize diversity benefit.

FS: The marketer submits a separate workbook for each of their customers; each workbook must demonstrate that the customer has procured resources to meet their FS capacity requirement. The program deals only with the marketer serving as the LRE (i.e., if a workbook fails the forward showing, marketer likely passes the CONE on to the customer through means outside of the program).

Ops: The resources and load in each workbook are accounted for in four separate sharing calculations. The marketer provides data for each set of resources/load to facilitate the operations program's calculations; likely the marketer is the single point of contact for the Ops program.

Governance: When they vote, the marketer receives a single senate vote and a house vote accounting for the sum of the higher of either summer or winter seasons for each of the four loads / the region's total NCP P50 load. The marketer represents them in RAPC discussions, though they may choose to divide their house vote, if necessary, but that would be done outside of the program.

Cost: The marketer pays one per-participant fee (likely each customer pays $\frac{1}{4}$ of a per-participant fee) and pays a load-based fee for the total MW = sum of [higher of either summer or winter seasons P50 peak load] for each of the four loads.

3. An agent represents five LSEs bringing load into the program.

These LSEs want to participate in the program but either cannot devote the time necessary to fully engage, cannot participate fully in the operations program (due to technical or functional limitations), or do not want to pay the full per-participant fee. The agent dispatches resources for all of these LSEs and can meet operational program technical requirements. Three of the LSEs are geographically collocated and can share resource and load diversity in times of need.

FS: The agent might determine that submitting three workbooks is appropriate (one for the three geographically collocated loads, one for each of the disparate loads). Alternatively, the agent and/or their LSEs could decide to submit five separate workbooks if the loads' agreement with the agent was more conducive to such an arrangement. The program would be agnostic to which approach is taken, so long as the agent is able to attest that each workbook submitted can share resource and load diversity without additional transmission. Each workbook submitted must demonstrate that the customer has procured resources to meet the FS capacity requirement. The program deals only with the agent serving as the LRE (i.e., if a workbook fails the forward showing, agent likely passes the CONE on to the LRE(s) through means outside of the program).

Ops: The resources and load in each workbook are accounted for in separate sharing calculations. The agent provides data for each set of resources/load to facilitate the operations program's calculations. The agent is the single point of 24x7 contact for the ops program, as they are dispatching resources to meet all five LSEs' load.

Governance: When they vote, the agent receives a single senate vote and a house vote accounting for the sum of the higher of either summer or winter seasons for each of the workbooks submitted / the region's total NCP P50 load. The agent represents them in RAPC discussions, though they may choose to divide their house vote, if necessary, but that would be done outside of the program.

Cost: The agent pays one per-participant fee (likely each customer pays 1/5 of a per-participant fee) and pays a load-based fee for the total MW = sum of [higher of either summer or winter seasons P50 peak load] for each of the workbooks submitted.

4. An entity assumes responsibility as an LRE for load outside the western US under a contract or other arrangement with one or more LSEs that operate in the relevant region. The LRE will be responsible as a participant in both the forward showing and the operations programs, and compliance with all applicable provisions of the FERC (license to import and export from US to relevant region) and WRAP Tariff.

For example, Canadian LSEs may contract with an affiliate or other third party in order to obtain some portion of the benefits of the program while preserving their own existing legal,

regulatory or other status. In such a case, the Canadian LSE would not be a participant; rather, an affiliate or other third party would be assigned all authority and responsibilities necessary to fully participate in the program as the LRE for the Canadian LSE's service territory.

FS: The assigned LRE will submit a workbook demonstrating the procurement of resources sufficient to meet the FS capacity requirement for each geographically collocated load for which it is responsible. Program costs, fees and obligations will be the responsibility of the assigned LRE.

Ops: The assigned LRE will provide data for each set of resources/load to facilitate the operations program's calculations. The assigned LRE is the single point of 24x7 contact for the ops program, as it is responsible for overseeing and accounting for the dispatch of resources to meet program obligations.

Governance: When voting, the assigned LRE receives a senate vote and a house vote based on load in the service territories associated with the relevant Canadian LSEs. The assigned LRE is expected to fully represent these interests in RAPC discussions.

Cost: The assigned LSE pays the applicable participant fees and a load-based fee for the total MW = sum of [higher of either summer or winter seasons P50 peak load] for each of the workbooks submitted.