



Program Review Committee

November 15, 2023; 9-10am PT

Meeting Objectives

1. Introduce new Vice-Chair and PRC Sector Representation
2. Provide updates on BPMs and review process

Discussion Topics

- I. Agenda Overview
- II. New PRC Sector Representations
 - a. Public Interest Organizations
 - b. Independent Power Producers (IPPs)/Marketers
- III. Co-Chair Election
- IV. BPM Updates
 - a. Stakeholder Engagement BPMs
 - i. BPM 301 Program Review Committee Workplan Development and Approval
Introduction
 - ii. BPM 302 Program Review Committee Proposal Development and Consideration
Introduction
 - iii. BPM 303 Expedited Review Process
ENDORSEMENT
- V. Next Steps
 - a. Meeting 11/15 9am PT
 - b. Additional Meeting 11/29 9am PT

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WESTERN
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Western Resource Adequacy Program

303 Expedited Review Process

Revision History

Manual Number	Version	Description	Revised By	Date
303	0.1	RAPC Glance Version	Rebecca Sexton	10/3/2023
303	0.2	Public Comment Version	Rebecca Sexton	10/6/2023
303	0.3	RAPC & PRC Discussion	Rebecca Sexton	11/2/2023

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303 Expedited Review Process

1. Introduction

Expedited Board of Directors' (Board) review of changes to the Tariff or Business Practice Manuals (BPMs) may take place when the Resource Adequacy Participant Committee (RAPC) determines there are Exigent Circumstances (including FERC-mandated amendments, amendments to address immediate reliability impacts, or amendments with significant impacts to utility service). In these circumstances, the RAPC will work with the Western Power Pool (WPP) staff to prepare the design change and may propose such a change directly to the Board. The Program Review Committee (PRC), Committee of State Representatives (COSR), and public will participate and comment directly to the Board during the Expedited Review Process, rather than using the customary stakeholder review process set forth in the Tariff. This Expedited Review Process BPM defines the process for reviewing and adopting changes that are exigent.

1.1. Intended Audience

This BPM is intended for the Western Resource Adequacy Program (WRAP) committees including the RAPC, COSR, and PRC, as well as other interested individuals or entities.

1.2. What You Will Find in This Manual

This document includes material relevant to changes to WRAP rules that can be considered under the Expedited Review Process due to Exigent Circumstances.

1.3. Purpose

This BPM provides an overview of the Expedited Review Process for implementing changes to the Tariff and BPMs due to Exigent Circumstances. The intent of all stakeholder engagement related BPMs (BPMs in the 300 series) is to ensure that changes to the Tariff and approved BPMs are undertaken transparently.

Nothing in this BPM changes in any way ultimate authority of the independent Board over all aspects of WRAP, or the Board's exclusive authority under Section 2.1 and Section 3.1 of the Tariff, to approve WPP to file, and direct WPP to file, Tariff amendments under Federal Power Act section 205.

1.4. Definitions

All capitalized terms that are not otherwise defined in this BPM have the meaning set forth in the Tariff. Any capitalized terms not found in the Tariff that are specific to this BPM are defined here.

Exigent Circumstances: Circumstances that the RAPC determines require amendments to the Tariff or approved BPMs due to FERC-mandates, immediate reliability impacts, or significant impacts to utility service.



Expedited Proposal: A RAPC determined amendment to the Tariff or BPMs requiring expedited Board review due to Exigent Circumstances.

Expedited Review Process: The activities undertaken by WRAP committees (RAPC, PRC, COSR), stakeholders, and the WPP Board when an Exigent Circumstance is identified and a change to the Tariff or BPMs is determined necessary by the RAPC.

2. Expedited Proposal Development

A Participant, the Program Administrator, or the Program Operator can submit a request for an Expedited Review Process to the RAPC Chair at any time. If the RAPC deems that the change must be addressed expeditiously due to Exigent Circumstances, the RAPC will develop an Expedited Proposal and schedule it for RAPC review. The Program Administrator and the Program Operator also may provide, but are not required to provide, a feasibility review that addresses the time, cost, and staffing requirements of the Expedited Proposal. The Expedited Proposal shall be considered by the RAPC during a public meeting, according to RAPC meeting procedures, and then if endorsed by the RAPC, shall be presented to the Board concurrent with review by the COSR, PRC and other WRAP stakeholders.

2.1. Expedited Proposal Circulation

The WPP will endeavor to post the Expedited Proposal and feasibility review to the WPP website two weeks prior to Board review, as time allows. Any comments submitted prior to the Board meeting by the COSR, PRC, or other WRAP stakeholders will be distributed to the Board for consideration.

2.1.1. COSR Opposition

If the COSR formally opposes the Expedited Proposal provided by the RAPC to the Board, the COSR can require that the RAPC engage in one open public discussion, provided this does not unreasonably hinder the Board's timely consideration.

2.2. Board of Directors Review

The Board will be given an opportunity to review the Expedited Proposal and any comments provided by stakeholders or committees and may itself comment upon the Expedited Proposal before taking action.

The Board will take action on the Expedited Proposal by either:

- 1) Voting for approval— in which case WPP will make a Federal Power Act section 205 filing with FERC to amend the Tariff, or will update the BPM(s) accordingly;

- 2) Voting for approval with changes – in which case the RAPC will revise the Expedited Proposal in accordance with the Board’s request and resubmit the proposal to the Board for review; or
- 3) Voting for rejection – in which case the Expedited Proposal terminates. Nothing prohibits any part of a rejected Expedited Proposal from being proposed as a Concept for consideration by PRC in future (see *BPM 301 – Program Review Committee Workplan Development and Approval*).

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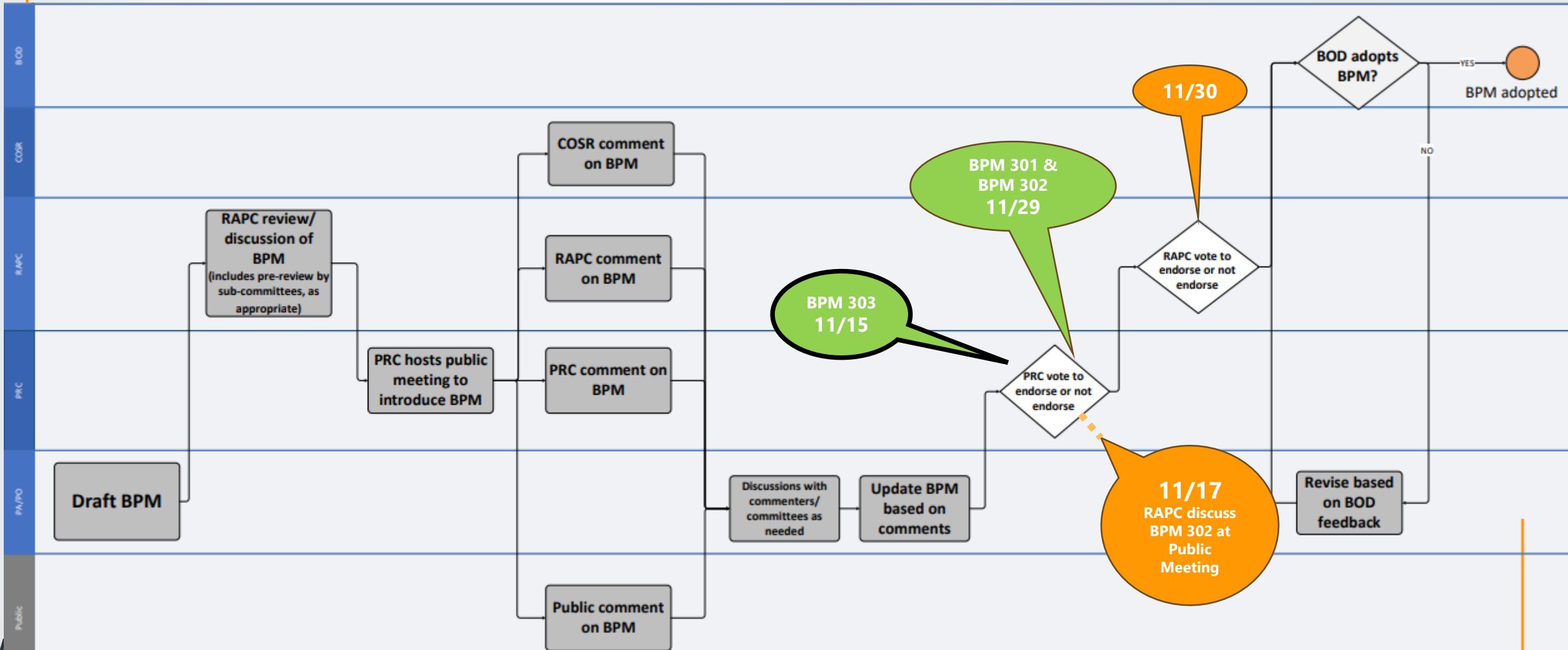
WESTERN RESOURCE ADEQUACY PROGRAM

November 15, 2023

Program Review Committee

BPM PROCESS FLOWCHART

BPM 301, BPM 302, BPM 303



BPM 301- WORKPLAN

SUMMARY OF EDITS

- » Noted that nothing changes the authority of the independent Board over all aspects of the WRAP
- » Definitions Section
 - Clarified definition of Lead Sponsor
 - Proposed adding definition of 'Non-Task Force Proposal' to allow for certain types of changes to made more frequently without resorting to the Expedited Change Process (BPM 303)
- » Change Request Review
 - Added Workplan Development Timeline along with responsible party at each stage
 - Expanded type of changes to include generic 'other'

BPM 301

SUMMARY OF COMMENTS NOT INCORPORATED

Comment Summary or Theme	WRAP Response
Add criteria for the PA Concept level of effort review	Such criteria will be initially developed and modified outside of the BPM process, but will be supplied to the PRC alongside the level of effort review
Additional stakeholder engagement beyond PRC review of Workplan	BPM 302 includes intensive stakeholder involvement of the development of concepts from the Workplan into a more detailed Proposal for Board consideration
Add additional RAPC review of PRC Workplan before presentation to the Board	The draft Workplan is reviewed by the RAPC as part of the overall stakeholder review. The PRC itself is also made up of four RAPC sector representation groups. The RAPC will have the opportunity to comment to the Board on the Workplan. RAPC will also be involved in development of concepts from the Workplan into a more detailed Proposal (BPM 302).

BPM 301- WORKPLAN

NON-TASK FORCE PROPOSAL - SUMMARY

- » Received comment requesting the ability to make changes (especially during the transition period) without going through the entire process
 - And without unnecessarily resorting to the expedited change process.
- » Idea: Lead Sponsor can flag a change as a “Non-Task Force Proposal”
 - If PA supports categorization, bring to PRC for agreement.
 - The change would then bypass the any further Workplan process and the Task Force process described in BPM 302, as the Concept does not require further development.
 - The Proposal goes through a comment and approval process similar to a regular Proposal
 - RAPC expressed support for the idea 11/9

BPM 302 – PROPOSAL

SUMMARY OF EDITS

» Proposal Drafting Process

- WPP will work with the PRC to develop an example or template of a typical Proposal document (but it will not be included in the BPM)
- Clarified that a Proposal only needs to include alternatives to a Concept (Tariff or BPM change) as applicable (not as a requirement)

» Proposal Review

- At least two weeks of public comment but could be longer as determined by Task Force.
- Proposed adding definition of 'Non-Task Force Proposal' to allow for certain types of changes to made more frequently without resorting to the Expedited Change Process (BPM 303)
- Clarified that the PRC "endorses" the Proposal while the RAPC "recommends".

BPM 302

SUMMARY OF COMMENTS NOT INCORPORATED

Comment Summary or Theme	WRAP Response
Task Forces: Clearly define membership criteria	The make up of the Task Force will be determined by the PRC to develop a Concept in Workplan into a more detailed and implementable Proposal
Have standard release schedules for proposed Tariff or BPM changes	Participants have also called for flexibility to allow the program to adapt (especially during the Transition Period) leading us to develop processes for Concepts that require developments into full Proposal, Non-Task Force Proposals, and Expedited Changes.
The COSR has multiple opportunities to comment on a Proposal	The COSR can provide input into a Task Force's initial draft Proposal, and also has an additional opportunity to respond to any changes made by the Task Force due to public comment

BPM 303

SUMMARY OF EDITS

» Purpose

- Note that nothing changes the authority of the independent Board over all aspects of the WRAP

» Expedited Proposal Development

- Clarified “other Committees” explicitly includes the COSR and the PRC
- Clarified that the proposal is presented to the Board only if recommend by RAPC
- Added that WPP will try to get the Expedited Proposal on the website for public comment at least two weeks prior to Board Review (as time and circumstances allow)
 - > Comments then supplied to the Board

» Board Review

- If RAPC vote to approve any changes made by the Board then WPP will file to amend the Tariff (or update the BPM). If RAPC amends the Board’s changes then RAPC shall resubmit the Proposal to the Board.

BPM 303

SUMMARY OF COMMENTS NOT INCORPORATED

Comment Summary or Theme	WRAP Response
Further define “significant utility impacts” in Exigent Circumstances	The current language gives RAPC flexibility and results from Tariff development discussions
Add further criteria for determining whether a change qualifies for expedited review	The process aims to ensure flexibility for the RAPC in making this determination
Specify duration of comment period on circulated expedited proposal	Given the exigent nature of these proposals the RAPC will determine the appropriate duration of the comment period
Further definition of criteria for COSR opposition to RAPC recommended Expedited Proposal	The formal opposition of the COSR will be based on subjective criteria and the BPM will not restrict that flexibility
Add a more detailed explanation of the Board’s criteria in reviewing and approving a RAPC recommended expedited proposal	To enable full Board flexibility during exigent circumstances the BPM will not restrict the criteria used in decision making