

Meeting Objectives

1. PRC Sector Representation Update
2. Provide Updates on BPMs and Review Process

Discussion Topics

- I. Agenda Overview
- II. Potential PRC Sector Representation
 - a. Independent Power Producers (IPPs)/Marketers
- III. BPM Updates
 - a. Stakeholder Engagement BPMs
 - i. BPM 301 Program Review Committee Workplan Development and Approval
ENDORSEMENT
 - ii. BPM 302 Program Review Committee Proposal Development and Consideration
ENDORSEMENT
 - iii. BPM 303 Expedited Review Process
CONSIDER RE-ENDORSEMENT
- IV. Next Steps
 - a. Meeting 12/20 9am PT

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Western Resource Adequacy Program

301 Program Review Committee
Workplan Development and
Approval

Revision History

Manual Number	Version	Description	Revised By	Date
301	0.1	RAPC Glance Version	Rebecca Sexton	9/19/2023
301	0.2	Public Comment Version	Rebecca Sexton	9/21/2023
301	0.3	RAPC & PRC Discussion	Rebecca Sexton	11/9/2023

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301 Workplan Development and Approval

1. Introduction

When a change to the Tariff or approved Business Practice Manuals (BPMs) is requested by a stakeholder, the established process and criteria for reviewing proposed amendments by the Program Review Committee (PRC) will be utilized. This process has two stages – Workplan Development and Approval and Proposal Development and Approval. This PRC Workplan Development and Approval BPM describes the change request management process through the Workplan Development stage. Section 4 Change Request describes the process of submitting a Change Request Form and review of submitted requests by the Program Administrator and the PRC. Section 5 Workplan Development outlines the process by which a Workplan is developed, reviewed, and approved.

1.1. Intended Audience

This BPM is intended for use by the Western Power Pool (WPP) Board, PRC, Program Administrator, Program Operator, and other interested individuals or entities. This BPM will be particularly useful to stakeholders submitting Change Request Forms and the PRC (which holds responsibility for Workplan Development).

1.2. What You Will Find in This Manual

This document includes material relevant to the WRAP change control process, including the method by which Change Request Forms are submitted by the public, reviewed by the Program Administrator and the PRC, and subsequently implemented into a PRC-developed Workplan.

1.3. Purpose

BPM 301 provides an overview of the change request and review process for proposed changes to the Tariff and approved BPMs. 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 the 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 BPM 301 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.

Lead Sponsor: The individual identified on the Change Request Form as the Lead Sponsor.

Change Request Form: A form available on the WPP website by which an individual may submit a Concept.

Concept: A suggested change to the Tariff or BPMs.

Non-Task Force Proposal: A Concept that could be implemented without being further developed into a Proposal by a Task Force.-

Proposal: A detailed description of a Concept identified in a Board approved Workplan.

Workplan: Plan of action that identifies Concepts for possible development into Proposals.

Task Force: As defined in *BPM 302 Program Review Committee Proposal Development and Consideration*

2. Background

The PRC is a multi-sector stakeholder committee charged with receiving, considering, and proposing design changes to the WRAP. The PRC will act as the clearing house for all recommended design changes not specifically identified as exigent by the RAPC (see *BPM 303 Expedited Review Process* for additional detail on such changes). Recommended changes may come from any stakeholder.

The PRC will be provided with facilitation support from the Program Administrator and program design/technical support from the Program Operator, as needed. If a stakeholder wishes to request changes to the WRAP, the stakeholder should submit a written explanation of the requested change, including any supporting information or data, to the PRC via the Change Request Form located on the WPP's website.

The PRC will review and prioritize requested changes into a draft Workplan (suggesting which Concepts will be developed into Proposals) and schedule; the Workplan will be reviewed by all WRAP-related committees and the public before being approved by the Board.

3. Change Request and Workplan Development Timeline

Activity/Milestone	Deadline	Process Owner
Final day to submit Change Request Forms	December 31 st	Lead Sponsor
Concept compilation delivered to PRC	January 15 th	Program Administrator
PRC prioritization of Concepts	January 15 th - February 1 st	PRC
Level of effort review	February 1 st - February 15 th	Program Administrator/Program Operator
Completion of draft Workplan	February 15 th - March 15 th	PRC
Stakeholder comment period	March 15 th - April 15 th	Stakeholders
Revision of Workplan	April 15 th - May 15 th	PRC
Distribution to the Board	May 15 th	Program Administrator
Board approval of Workplan	June 1 st	Board
Final revisions* <i>*as needed</i>	June 1 st - June 15 th	PRC

4. Change Request

At any time, Participants, the Committee of State Representatives (COSR), other committees, stakeholders, or the public can suggest a change to the Tariff or BPMs. Such a change request will go through the PRC change control and stakeholder review process. Section 3 shows the change request timeline from the submission of the Change Request Form to Board approval of a Workplan.

4.1. Change Request Form

A suggested change to the Tariff or BPMs is initiated via submission of a Change Request Form. This form will be available on the WPP website. A Lead Sponsor will be identified on each Change Request Form. For a Change Request Form to be considered complete, the following information will be provided (optional information is indicated by *):



- **Lead Sponsor Information**
 - Name, Title, Organization, Email, Phone Number, Date of Submission
- ***co-Sponsor(s) Information**
 - Name, Title, Organization, Email, Phone Number - *Recorded in the case of more than one person or organization submitting a change collaboratively*
- **Designation of the type of change requested**
 - Correction (i.e., revision of erroneous language or language that needs clean-up for grammatical errors or inconsistency across governing documents - no change to intent or policy)
 - Clarification (i.e., language revision to better represent intent - no changes to functionality or policy)
 - Enhancement (i.e., language revision to expand upon existing intent or functionality)
 - New provision, criteria, protocol, or business practice (i.e., additional language to accommodate new policy or new functionality)
 - Change (i.e., a change in the existing policy – will replace existing language)
 - Other (i.e., changes that do not fall into the categories listed above)
- **Description of Change**
 - Description of the issue
 - *Proposed solution to the issue described
 - *Identification of the document (e.g. Tariff or specific BPM) and/or language within such document to which a change is recommended, and/or recommended language to execute the proposed change
- **Impact of Change**
 - Benefits from making this change
 - *Any data or information available that would characterize the importance or magnitude of the issue (including file attachments as required)
- ***Flag as Non-Task Force Proposal**
 - Indication that the Lead Sponsor proposes the Concept could be implemented without being further developed into a more detailed Proposal by a Task Force.

Change Request Forms can be submitted at any point during the year. The Program Administrator will inspect submitted Change Request Forms within 15 days of their submission and inform the Lead Sponsor if the Change Request Form is incomplete. An incomplete Change Request Form may not receive further consideration until it has been completed. After the Lead Sponsor is notified of an incomplete Change Request

Form they will be given the opportunity to provide revisions and must re-submit a complete form.

In the event that similar Concepts are requested by more than one stakeholder, the Program Administrator may recommend co-sponsorship of the Concept to the Lead Sponsors of similar Concepts; Lead Sponsors can determine whether to withdraw their individual submissions and resubmit a Concept as co-Sponsors at their will.

If a Concept is flagged as a Non-Task Force Proposal and the Program Administrator agrees the Concept can proceed as a Non-Task Force Proposal, the Program Administrator and Lead Sponsor will present the Change Request Form to the PRC for consideration at the next scheduled PRC meeting. If the Program Administrator, or subsequently the PRC, determines that the proposed Concept is not a Non-Task Force Proposal then the Change Request Form will be modified to remove the Non-Task Force Proposal designation and proceed in the same manner as any other Change Request Form unless it is withdrawn by the Lead Sponsor.

On December 31 of each year, the Program Administrator will compile all Change Request Forms completed and submitted in that calendar year and begin an initial review January 1 the following year. Incomplete forms submitted after December 16 will not be considered in the following year's Workplan.

4.2. Compilation of Concepts

The Program Administrator will compile all completed Concepts (those not flagged as Non-Task Force Proposals) and deliver this list (and the Concept submissions) to the PRC by January 15 to facilitate the start of its Workplan Development.

In the event that similar Concepts are requested by more than one stakeholder and the Lead Sponsors of the similar Concepts elected to maintain separate Concepts, or time did not allow for the Program Administrator to notify the Lead Sponsors of the similar Concept, the Program Administrator will note such similarity to the PRC and notify the Lead Sponsors not previously notified.

PRC review and processing of Non-Task Force Proposals is discussed in Section 5.3.1.1.

4.3. PRC Review of Concepts

The PRC will prioritize Concepts received in the compiled list according to a PRC-determined method involving established criteria. The PRC will aim to reach agreement on prioritization via consensus, however, given a situation where consensus is not achieved, the PRC will vote on a prioritized slate of Concepts.

This prioritization process will be complete by February 1.

4.4. Level of Effort Review

Once the Program Administrator receives the prioritized Concept list, the Program Administrator will work with the Program Operator to give each Concept in the list a level of effort ranking. This level of effort ranking will include a description of the requirements for addressing each Concept (Program Administrator and Program Operator support, Participant engagement, etc.) as well as the anticipated timeline. The PRC will be supplied with the criteria used to determine the level of effort ranking. The level of effort review will be complete by February 15.

5. Workplan Development

Once the Concepts have been reviewed, prioritized, and given a level of effort score and description, the PRC will begin annual Workplan Development.

5.1. PRC Development of Workplan

The Workplan will include the following:

- 1) Executive Summary
- 2) Background
- 3) Proposed Plan
- 4) Summary of Recommended Concepts
- 5) Supporting Analysis
- 6) Schedule

The schedule will include a high-level timeline for each Concept recommended for development into a Proposal. Such schedules will include Proposal development, but will not include potential timelines for implementation (implementation timelines will be determined as part of the Proposal development process -see *BPM 302 Proposal Development and Consideration*). The schedules for Workplan implementation may extend beyond a single year. In years where a Workplan is under development at the same time as a prior Workplan is being executed, the new Workplan will account for the past year(s) Workplan(s) and provide an updated combined schedule.

The Workplan will include appendices providing reviewers of the proposed Workplan insight into the recommendations of the PRC and the decision-making process. At minimum, appendices for the Workplan will include all relevant completed Change Request Forms, any metrics or categorization methods used to evaluate and prioritize Concepts, and information regarding the proposed Task Forces (e.g. Task Force size, subject matter expertise) for Proposal development of each Concept.

5.2. Draft Workplan Review Process

The PRC will publish a draft Workplan for review on March 15.

5.2.1. Stakeholder Review

The draft Workplan will be published on the WPP website on March 15 and open to comment until April 15. During this time the RAPC, COSR, and the public may review and submit comments on the draft Workplan. The Program Administrator, and Program Operator may provide comments concurrently at this time.

5.2.2. Comments Intake

At the end of the comment period on April 15, the Program Administrator will compile all comments received and distribute them to the PRC. The PRC will review the comments provided and revise the draft Workplan as it sees fit. This revision process is allocated 4 weeks and will be completed by May 15.

Prior to Board distribution, the PRC will create a summary of comments received, including a narrative describing why they were or were not addressed. The full set of comments will be attached to the draft Workplan as an appendix. The revised draft Workplan will be distributed to both the Board and RAPC, and also posted publicly by May 15.

5.3. Workplan Approval

The revised draft Workplan will be presented to the Board of Directors. The Board will consider and act on the Workplan in public session no later than its next quarterly board meeting, during which RAPC and other stakeholders will have the opportunity to express any opinions in public comment. Board approval of a Workplan will trigger implementation and Proposal development (see *BPM 302 Proposal Development and Consideration*). The Board will determine the appropriate next steps if it does not approve the Workplan or seeks amendments.

5.3.1.1. Consideration of Non-Task Force Proposals

If the PRC determines that a Change Request Form meets the Non-Task Force Proposal criteria, the Non-Task Force Proposal will proceed to the Proposal review and approval processes, as detailed in *BPM 302 Program Review Committee Proposal Development and Consideration*.

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302 Program Review Committee
Proposal Development and
Consideration

Revision History

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302	V0.1	RAPC Glance Version	Rebecca Sexton	10/19/2023
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302	V0.3	RAPC & PRC Discussion	Rebecca Sexton	11/15/2023

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302 Proposal Development and Consideration

1. Introduction

When a change to the Tariff or Business Practice Manuals (BPMs) is requested by a stakeholder (and does not qualify as an exigent circumstance within the meaning of Tariff section 4.1.3 (see BPM 303 *Expedited Review Process*) or other change specifically reserved to the RAPC under the Tariff, the established process and criteria for reviewing proposed amendments by the Program Review Committee (PRC) will be utilized. This process has two stages – Workplan Development and Approval (see *BPM 301*) and Proposal Development and Approval (*BPM 302*). BPM 302 describes how an individual Concept moves through the change control process, including how a Proposal is developed, commented upon, and approved for implementation. The Proposal Development section describes the creation of Task Forces by the PRC to address a proposed change to the Tariff or BPMs, and the Proposal Development process that occurs within that group. The

Proposal Review section of this BPM describes the process by which a Proposal is commented upon, revised, and approved. Non-Task Force Proposals, as determined by the PRC (see *BPM 301*) do not undergo Proposal Development and proceed directly to the Proposal review process.

1.1. Intended Audience

BPM 302 is intended for the PRC, Program Administrator, Program Operator, and other interested individuals or entities. This BPM will be particularly useful to members of PRC Task Forces responsible for the development of a Proposal according to an established Workplan, as well as to WRAP stakeholders participating in the Proposal review and approval process.

1.2. What You Will Find in This Manual

BPM 302 contains material relevant to the WRAP program change process, including the method by which Concepts are developed into Proposals, , revised by the PRC and assigned Task Forces, and subsequently considered for implementation into the Tariff or BPMs. This manual also describes review and approval of Non-Task Force Proposals.

1.3. Purpose

BPM 302 provides an overview of the Proposal Development and approval process for changes to the Tariff or BPMs. 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 the 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 their meaning set forth in the Tariff. Any capitalized terms not found in the Tariff that are specific to this BPM are defined here.

Concept: As defined in *BPM 301 Program Review Committee Workplan Development and Approval*.

Lead Sponsor: As defined in *BPM 301 Program Review Committee Workplan Development and Approval*.

Proposal: As defined in *BPM 301 Program Review Committee Workplan Development and Approval*.

Non-Task Force Proposal: As defined in *BPM 301 Program Review Committee Workplan Development and Approval*.

Task Force: PRC sub-committee responsible for refining Concepts into full Proposals.

Workplan: As defined in *BPM 301 Program Review Committee Workplan Development and Approval*.

2. Background

The PRC is a multi-sector stakeholder committee charged with receiving, considering, and proposing design changes to the WRAP. The PRC will act as the clearing house for all recommended design changes not specifically identified as exigent by the RAPC (see *BPM 303 Expedited Review Process* for additional detail on such changes).

Recommended changes may come from Participants, the Committee of State Representatives (COSR), the Board or any of its members, other committees, stakeholders, or the public.

The PRC will be provided with facilitation support from the Program Administrator and program design/technical support from the Program Operator, as needed. If a stakeholder seeks to change the Tariff or a BPM, the stakeholder should submit a written explanation of the requested change, including any supporting information or



data, to the PRC via the Change Request Form located on the Western Power Pool's (WPP) website.

After a Workplan for addressing proposed changes is created and approved (see *BPM 301 PRC Workplan Development & Approval*), the PRC will identify Task Forces to refine requested changes into full Proposals, working with the Program Administrator and Program Operator. The draft Proposal, and any Non-Task Force Proposals, will be reviewed by the Program Administrator and Program Operator, the public, the COSR, and the RAPC before being considered by the Board.

3. Proposal Development

In accordance with the schedule and guidance provided in the Workplan, the PRC will identify Task Forces as appropriate to develop Workplan Concepts into Proposals. Once a Proposal is drafted, it will be reviewed and presented for comment and approval. Non-Task Force Proposals, as determined by the PRC, do not require further development and proceed directly to the Proposal review process (see section 4 of this BPM).

3.1. Task Force Creation

The PRC's draft Workplan will identify the skillsets required on a Task Force for it to develop a Concept (or set of Concepts) into a Proposal. These skillsets may include, but are not limited to subject matter expertise on: transmission systems, power marketing, legal, regulatory, financial, or other resource-specific knowledge. A Task Force may be assigned to a single Concept or group of similar Concepts as identified in the Workplan, and will be populated with the identified skills and knowledge to develop a specific Concept (or set of Concepts) into a Proposal (or Proposals).

The Concept's Lead Sponsor (see *BPM 301 PRC Workplan Development & Approval*), will participate as a member of the Task Force. The remainder of the Task Force may include members of the PRC or any other individuals with specific subject matter expertise. The PRC will take nominations for Task Force participation, review the pool of interested individuals, and determine the roster for each Task Force according to the schedule from the Workplan.

In the process of selecting Task Force members, the PRC will endeavor to balance the need for diversity of perspective with creating groups appropriately sized to prioritize efficiency.



3.1.1. Task Force Decision Making

Each Task Force will decide its own procedures pertaining to decision making processes (e.g., voting/consensus), leadership structure (e.g., chair/co-chair), and meeting frequency. All Task Forces will have non-Program Administrator/Program Operator leaders who will work with the Program Administrator and Program Operator to facilitate Task Force engagement and processes.

The Program Administrator will be tasked with supporting Task Force administrative functions and collaborating with the Task Force (with help from the Program Operator) to provide options, recommendations, and input on draft Proposals as requested.

3.2. Proposal Drafting Process

For a given Concept (or Concepts), the associated Task Force develops a Proposal to address the requested changes. This Proposal shall include:

- A description of the need and the benefits resulting from the proposed change;
- Specific changes or updates to the Tariff or BPMs (e.g. redlines) that would be required to implement the Proposal;
- Alternative updates that were considered (if applicable)
- A resource and cost assessment and feasibility review by the Program Administrator and Program Operator; and
- A proposed implementation timeline.

The Task Force leadership (e.g., chair, co-chairs) will provide monthly status updates on the draft Proposal to the PRC. The monthly report will include a written summary of activities accomplished and decisions made by the Task Force since the last monthly report. PRC members may use these updates to provide feedback and input to Task Forces in advance of the review of completed Proposals. The PRC may determine it is necessary to work with the Program Administrator, Program Operator, and RAPC to consider implementation schedules of multiple Proposals to facilitate execution (e.g., deciding to implement multiple changes in conjunction, or timing implementation for shoulder seasons); such an approach may be implemented by the PRC in the review of and comments on Proposals.

3.2.1. Program Administrator/Program Operator Comment and Feasibility Review

The Program Administrator and Program Operator will collaborate with the Task Force to provide a feasibility review that addresses the time, schedule, cost, and staffing requirements of the Proposal. This review will be provided when the Proposal is complete, prior to the Proposal review period. The Program Administrator and Program Operator may suggest alternatives and otherwise provide insight to the Task Forces



during the Proposal drafting process and to the PRC during the evaluation and decision-making process.

3.2.2. Development of Questions for Public Comment

To facilitate stakeholder engagement, the Task Force will propose a set of questions for consideration during comment windows. At this stage, the Task Force will revisit the timelines proposed in the Workplan for comment collection and adjust as necessary.

3.2.3. Proposal Ready for Comment

Once a Task Force has completed its development of a draft Proposal and questions for public comment, the PRC will verify its completeness and direct the Program Administrator to post it for public comment. This review by the PRC is not an endorsement of the proposed changes. If the PRC determines that the Proposal is not complete, the PRC will provide feedback to the Task Force as to the Proposal's deficiencies.

4. Proposal Review

Once a Proposal is ready for public comment, the Proposal is published on the WPP website. The Task Force can recommend that the Program Administrator host a webinar with the support of the PRC, Task Force, or Program Operator, as needed, to introduce the Proposal to the public. Non-Task Force Proposals (those the PRC has agreed do not necessitate development by a Task Force, see BPM 301 PRC Workplan Development for further detail) are directly published on the WPP website for public comment. For the purposes of Section 4 Proposal Review, the term "Proposal" includes Non-Task Force Proposals, and in that reading the term "Task Force" implies the Lead Sponsor of the Non-Task Force Proposal.

4.1. Public Comment

The Task Force will recommend to the PRC a duration of no less than two weeks for the open public comment window, depending on the length, complexity, and anticipated impact of the Proposal. The PRC will set a deadline for public comment on a given Proposal. Note that Participants, COSR members, Board members, or anyone else may comment on the draft Proposal during this time. Comments will be submitted to the WPP website.

After the public comment period ends, the Task Force will review all comments submitted and update the Proposal at its discretion. Comments will be made available publicly as they are submitted and will remain available after the comment period closes



(through consideration by the Board of Directors). The Task Force will inform the PRC of any changes, either in writing or via a meeting if schedules allow.

4.2. COSR Comments

After the public comment period ends, the updated Proposal will be published on the WPP website for COSR review along with a summary of the public comments received and any changes made to address them.

The Task Force will provide a recommendation to the PRC for the length of the COSR comment period on the Proposal. The PRC will determine a deadline for COSR comments. Comments are submitted by the COSR to the WPP website and will be available publicly upon submission.

After the COSR comment period, the Task Force will review all comments submitted and will update the Proposal at its discretion.

4.3. PRC Endorsement Process

Once the public and COSR reviews of a Proposal are complete and comments have been reviewed by the Task Force and incorporated at its discretion, the PRC will consider whether to endorse the Proposal to the RAPC.

4.3.1. Public Meeting and Decision

The PRC will host a public meeting to review comments received, identify any updates made in response to those comments, and decide whether to endorse the Proposal to the RAPC.

4.3.1.1. PRC Sector Voting

The PRC will endeavor to operate by consensus. If PRC consensus on a Proposal endorsement cannot be achieved, voting will be undertaken in the method described in the PRC charter (posted on the WPP website). The Proposal will progress to the RAPC regardless of the outcome of the PRC process, but attaining an affirmative PRC recommendation will lower the required RAPC voting threshold per the Tariff.

4.4. RAPC Review

The Proposal will progress to the RAPC regardless of the outcome of the PRC process, but attaining an affirmative PRC recommendation will lower the required RAPC voting threshold per the Tariff. The RAPC will vote whether to recommend approval of the Proposal to the Board.



For a Proposal to be affirmatively recommended by the RAPC, it must pass both House and Senate vote tallies as described in the Tariff. A Proposal affirmatively recommended by the PRC requires a 67% affirmative vote in both the House and Senate tally to be endorsed by the RAPC. A Proposal not affirmatively recommended by the PRC requires a 75% affirmative vote in both the House and Senate Tally to achieve RAPC endorsement.

A RAPC vote on a Proposal can have three outcomes: RAPC recommends the Proposal to the Board unmodified, RAPC recommends approval of the Proposal as modified, or RAPC recommends rejection of the Proposal.

4.4.1. RAPC Recommends Approval

The RAPC votes to recommend that the Board approve the Proposal without changes.

4.4.1.1. COSR Formal Opposition to Recommended Proposal

If RAPC votes to recommend a Proposal without change, the COSR has one week to register its opposition to the endorsed Proposal with the RAPC. If the COSR registers its opposition, the RAPC is required to engage with the COSR, including at least two discussions to attempt to reach a mutually agreeable solution. These discussions will be open to the public and held within 4 weeks of the COSR's notification of opposition.

4.4.2. RAPC Recommends Approval with Changes

If RAPC makes changes to the Proposal during its vote to recommend approval, the 75% voting threshold will apply because the Proposal is no longer the same as was recommended by the PRC.

4.4.2.1. COSR Requests Additional Public Review

If RAPC makes changes to a Proposal when voting on it, COSR leadership will be notified and can elect to initiate an additional public review if COSR determines the RAPC-recommended Proposal to be substantially different from the Proposal submitted to the RAPC by the PRC. The COSR must notify the chair of the PRC that it would like additional public review within two weeks of the RAPC vote on the changed Proposal.

Once COSR notifies the PRC leadership, the changed Proposal will be posted to the WPP website for a two-week public comment window. The PRC will summarize the comments received, but no further changes are made to the Proposal.

4.4.2.2. COSR Formal Opposition to RAPC Endorsement with Changes

If RAPC endorses a Proposal with changes, the COSR has two weeks to register its opposition to the endorsed Proposal with RAPC. If the COSR registers its opposition, the



RAPC is required to engage with the COSR, including at least two discussions to attempt to reach a mutually agreeable solution. These discussions will be open to the public and held within 4 weeks of the COSR's notification of opposition. These discussions will take place in parallel with any additional public review process requested by COSR per section 4.4.2.1).

4.4.3. RAPC Rejects

If RAPC votes to reject the Proposal, the Proposal terminates (i.e., is not reviewed by the Board), unless the RAPC decision is appealed to the Board.

4.4.3.1. Appeal of RAPC Rejection

If the RAPC votes to reject a Proposal or fails to vote to recommend approval of a Proposal within 30 Days of PRC action, any person may appeal to the Board to review and vote on a Proposal. Such an appeal must be submitted to the Program Administrator within 2 weeks after the RAPC rejection vote or within two weeks after the RAPC's failure to take action within 30 Days after PRC action. Whether to entertain the appeal is solely within the Board's discretion.

4.5. Board Interaction

The Board will receive all Proposals (including all comments received during the review process) for discussion and approval that:

- Have been approved by RAPC with no opposition by COSR;
- Have been rejected or not acted upon by the RAPC but has been appealed by a stakeholder to the Board;
- Have been approved by the RAPC but identified by COSR as substantially different than the PRC version and have undergone additional public review; or
- Are formally opposed by the COSR, with RAPC and COSR also having met at least two times to attempt a mutually agreeable solution.

4.5.1. Study Session as Needed

The Program Administrator will work with the Task Forces and the PRC to host study sessions for the Board, at the discretion of the Board, on Proposals that have come before the Board for approval.

4.5.2. Stakeholder Comment

Per Board procedures, members of the public, RAPC representatives, COSR members, or other stakeholders may comment during a public Board meeting on a Proposal under consideration by the Board (including a Proposal that has been placed on the Board's consent agenda). It is highly encouraged that stakeholders opposing the Board's



approval of a Proposal engage in the public and committee review process on such Proposal to voice concerns and provide written documentation throughout.

4.5.3. Vote

Per Board procedures, the Board will act on the Proposal by either:

- Approval – in which case implementation of the Proposal is initiated;
- Rejection – in which case the Proposal terminates; or
- Changes needed – the Board may determine either to make changes and approve an updated Proposal or to send the Proposal back to any stage in the drafting or review process (at the Board's discretion) with feedback or guidance for necessary updates and repeat all subsequent review processes.

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Revision History

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303	0.2	Public Comment Version	Rebecca Sexton	10/6/2023
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303	0.4	RAPC Endorsement	Rebecca Sexton	11/13/2023

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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 recommended 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 shall consider the changes. If the RAPC votes to approve the Board's changes WPP will make a

Federal Power Act section 205 filing with FERC to amend the Tariff, or will update the BPM(s) accordingly. If the RAPC makes changes to the Board's recommendations, RAPC shall 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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