

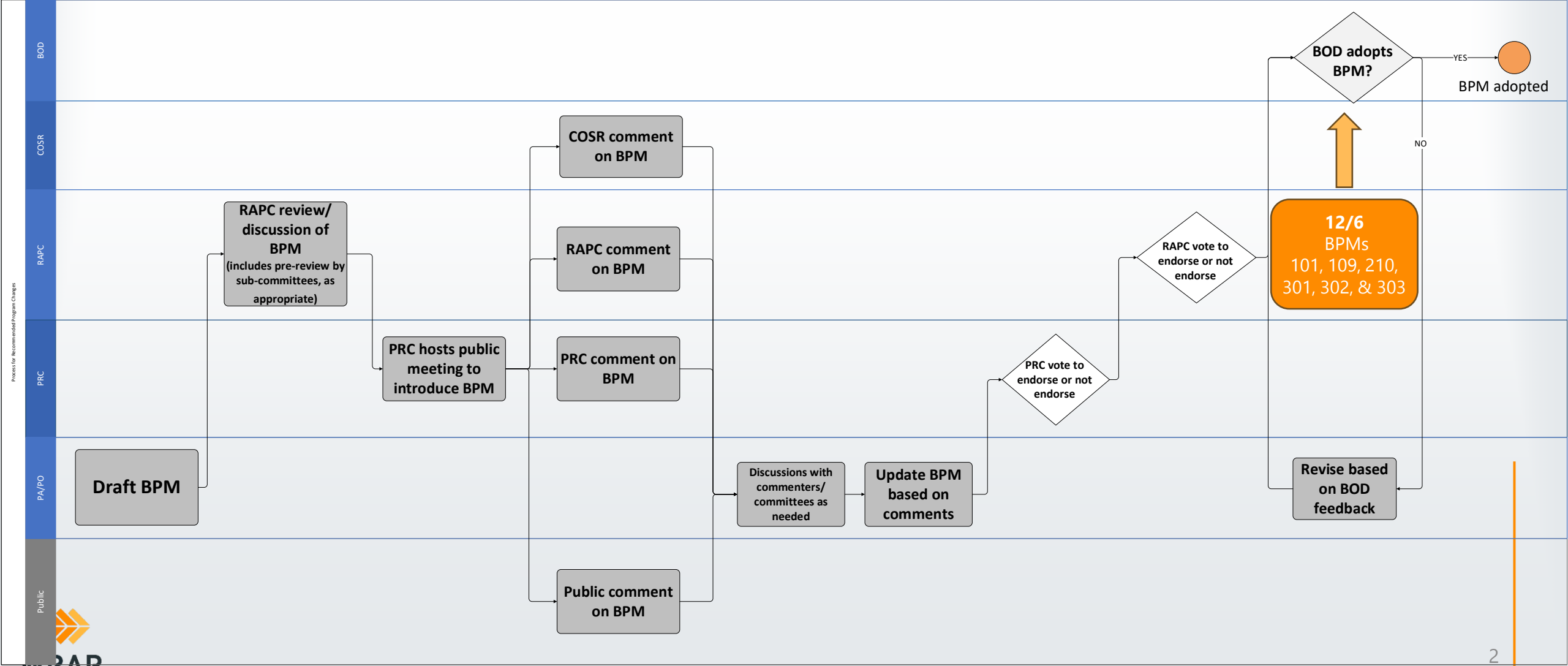


# **WESTERN RESOURCE ADEQUACY PROGRAM**

December 6, 2023

**Open Board Meeting BPM Review**

# BPM PROCESS FLOWCHART



Process for Recommended Program Changes

BOD  
 COSR  
 RAPC  
 PRC  
 PA/PO  
 Public

# BPM STATUS UPDATE

BPM	PRC Endorsement		RAPC Endorsement	
<b>101</b> – Advance Assessment	11/6	<i>unanimous</i>	11/9	<i>unanimous</i>
<b>109</b> – Forward Showing Transition Period	10/18	<i>unanimous</i>	10/26	<i>unanimous</i>
<b>210</b> – Operations Program Transition Period	11/6	<i>unanimous</i>	11/9	<i>unanimous</i>
<b>301</b> – PRC Workplan Development and Approval	11/29	<i>unanimous</i>	11/30	<i>unanimous</i>
<b>302</b> – PRC Proposal Development and Consideration	11/29	<i>unanimous</i>	11/30	<i>unanimous</i>
<b>303</b> – Expedited Review Process	11/15	<i>unanimous</i>	11/30	<i>unanimous</i>

# BPM 101 OVERVIEW

## *FORWARD SHOWING - ADVANCE ASSESSMENT*

### » The Advance Assessment determines :

- Forward Showing Planning Reserve Margins (**FSPRMs**) for Summer and Winter Binding Seasons two years ahead (T-2) , and Advisory Binding Seasons five years ahead (T+3).
- Qualifying Capacity Contributions (**QCCs**) – values aggregated by resource will be available to all Participants, but QCCs for individual resources will only be available to the Participant that submitted data

### » Advance Assessment Timeline

- PO will issue data request two years ahead of target Forward Showing Year by January 15 (T-2)
- Summer Season Study complete October 31 (T-2), Winter Season Study complete March 31 (T-1)
- FS deadlines: Summer October 31 (T-1) and Winter March 31 (T-0)
- Board approval to follow within 3 months

### » Advance Assessment Data (Submittal, Verification, Draft Results, Distribution)

- Data request (T-2) points to specifications in the Data Request Instruction Manual
- Includes NERC GADS data to calculate forced outage rates, (additional) hourly load profiles, wind/solar/ROR hourly generation profiles

# BPM 101 COMMENTS & EDITS

## *FORWARD SHOWING - ADVANCE ASSESSMENT*

- » Most comments were about clarification/additional details. Made minor language changes across the BPM to address these items.
- » Any comments not addressed were largely questions that we answered for Participants
- » Comment received requesting a calendar of all WRAP annual dates
  - Will be developed, not to be included in any single BPM

# BPM 101 NOTES

## FORWARD SHOWING - ADVANCE ASSESSMENT

BPM	PRC Endorsement		RAPC Endorsement	
<b>101</b> – Advance Assessment	11/6	<i>unanimous</i>	11/9	<i>unanimous</i>
<b>109</b> – Forward Showing Transition Period	10/18	<i>unanimous</i>	10/26	<i>unanimous</i>
<b>210</b> – Operations Program Transition Period	11/6	<i>unanimous</i>	11/9	<i>unanimous</i>
<b>301</b> – PRC Workplan Development and Approval	11/29	<i>unanimous</i>	11/30	<i>unanimous</i>
<b>302</b> – PRC Proposal Development and Consideration	11/29	<i>unanimous</i>	11/30	<i>unanimous</i>
<b>303</b> – Expedited Review Process	11/15	<i>unanimous</i>	11/30	<i>unanimous</i>

# BPM 109 OVERVIEW

## *FORWARD SHOWING – TRANSITION PERIOD*

- » Participants select their first Binding Seasons within a three-year transition period (Summer 2025 – Winter 2027-2028)
  - Participants with executed WRAPAs prior to this BPMs effective date already gave notice of first Transition Binding Season.
  - After BPM becomes effective, new Participants will need to indicate first Transition Binding Season.
    - > After March 31, 2027, commence participation after Transition Period (no transition seasons remain).
- » Non-binding Season Participation: **not** subject to FS Deficiency Charges, mandatory Holdback Requirement or Delivery Failure Charges.
- » FS Deficiency reductions:
  - Excused Transition Deficits (ETD): From 75% of FSPRM Summer 2025 to 25% of FSPRM Winter 2027-2028, with an equivalent percentage reduction in the FS Deficiency Charge
  - No-JCAF Option: 100% reduction in FS Deficiency Charge for up to 25% of FSPRM (reduces maximum permitted use of ETDs).
  - Use of either reduction requires Senior Official Attestation (included as appendices)

# BPM 109 COMMENTS & EDITS

## *FORWARD SHOWING – TRANSITION PERIOD*

- » Many comments regarding clarification. Made language changes and minor edits to address these changes
  - Added clarification to Participant’s First Binding Season, application of ETDs (also preparing an example demonstrating how the Deficiency Charges are calculated when using the transition provisions )
  - Updated language for distribution of revenues from deficiency charges and No-JCAF Option attestation
- » Several comments received that would have required Tariff changes
  - answered Participant questions without making changes
- » Added references to BPM 210 Operation Program Transition Period to clarify the Ops Program expectations for the Transition Period Seasons



# BPM 109 NOTES

## FORWARD SHOWING – TRANSITION PERIOD

BPM	PRC Endorsement		RAPC Endorsement	
<b>101</b> – Advance Assessment	11/6	<i>unanimous</i>	11/9	<i>unanimous</i>
<b>109</b> – Forward Showing Transition Period	10/18	<i>unanimous</i>	10/26	<i>unanimous</i>
<b>210</b> – Operations Program Transition Period	11/6	<i>unanimous</i>	11/9	<i>unanimous</i>
<b>301</b> – PRC Workplan Development and Approval	11/29	<i>unanimous</i>	11/30	<i>unanimous</i>
<b>302</b> – PRC Proposal Development and Consideration	11/29	<i>unanimous</i>	11/30	<i>unanimous</i>
<b>303</b> – Expedited Review Process	11/15	<i>unanimous</i>	11/30	<i>unanimous</i>

# BPM 210 OVERVIEW

## *OPERATIONS PROGRAM—TRANSITION PERIOD*

- » Details the implications in the Operations Program for participants who exercises the FS Transition Provisions detailed in BPM 109.
  - If participants utilize FS transmissions to procure less capacity, Ops program does not assume they have procured this capacity in the duration between FS and Ops (their Ops obligations are reduced in accordance with their use of either No-JCAF or ETD provisions)
- » Access priority when insufficient Holdback is available for sharing
  - Tier 1: Binding Participants that passed FS or paid FS Deficiency Charge without ETDs or no-JCAF Option
  - Tier 2: Binding participants that utilized ETDs or No-JCAF option to reduce their deficiency
  - Tier 3: Non-Binding Participants
- » Access to Voluntarily Offered Capacity (see BPM 204)
  - Voluntary capacity will be available in the same priority as above
  - Tier 3 Participants that offer Voluntary Holdback not subject to Delivery Failure Charges (but encouraged to only offer when they will follow through)

# BPM 210 COMMENTS & EDITS

## *OPERATIONS PROGRAM– TRANSITION PERIOD*

- » Comments on clarification and additional detail were addressed with minor edits and language changes, as well as the addition of examples
- » Some comments pertained to items discussed in other BPMs – no changes made; any questions associated (as well as additional questions from Participants) were answered in RAPC
- » After reviewing the comments on BPM 109, some edits were made to align other BPMs
  - Clarified how to use of a No-JCAF Option relates to the Priority Tiers
- » Comment received requesting a glossary of all WRAP terms
  - Being developed for internal use, edited for public use – not to be included in its entirety in all BPMs

# BPM 210 NOTES

## OPERATIONS PROGRAM—TRANSITION PERIOD

BPM	PRC Endorsement		RAPC Endorsement	
<b>101</b> – Advance Assessment	11/6	<i>unanimous</i>	11/9	<i>unanimous</i>
<b>109</b> – Forward Showing Transition Period	10/18	<i>unanimous</i>	10/26	<i>unanimous</i>
<b>210</b> – Operations Program Transition Period	11/6	<i>unanimous</i>	11/9	<i>unanimous</i>
<b>301</b> – PRC Workplan Development and Approval	11/29	<i>unanimous</i>	11/30	<i>unanimous</i>
<b>302</b> – PRC Proposal Development and Consideration	11/29	<i>unanimous</i>	11/30	<i>unanimous</i>
<b>303</b> – Expedited Review Process	11/15	<i>unanimous</i>	11/30	<i>unanimous</i>

# BPM 301 OVERVIEW

## *STAKEHOLDER PROCESS – WORKPLAN DEVELOPMENT & APPROVAL*

- » When a change to the WRAP Tariff or a BPM is requested, the Program Review Committee follows the process for reviewing proposed amendments..
- » Change Request Form
  - Sponsor, type of change, description of change, impact of change
  - Review of Concepts submitted generally will occur on a once-yearly basis
  - Changes that do not require further development will bypass workplan development (are considered as they are submitted) and move directly to review (BPM 302), if WPP and PRC agree they do not need task force development
- » PRC prioritizes concepts (voting if consensus cannot be achieved) and creates a workplan (summary of recommended concepts, supporting analysis, schedule)
  - PA/PO assigns each Concept in the priority list a level of effort ranking to inform workplan development
  - Draft workplan is posted for public comment; comments to be considered/incorporated by PRC
- » Board considers / approves the workplan from PRC
  - Board Rejection: PRC to consider recommended Board changes and re-present Workplan to Board.
- » Workplan development process takes place annually January - June

# BPM 301 TIMELINE

## *STAKEHOLDER PROCESS – WORKPLAN DEVELOPMENT & APPROVAL*

Activity/Milestone	Deadline/Period	Process Owner
Change Request Form submission	Dec 31 <sup>st</sup>	Lead Sponsor
Compiled Concepts delivered to PRC	Jan 15 <sup>th</sup>	PA
PRC Concept Prioritization	Jan 15 <sup>th</sup> – Feb 1 <sup>st</sup>	PRC
Level of effort review	Feb 1 <sup>st</sup> – Feb 15 <sup>th</sup>	PA/PO
Draft Workplan completion	Feb 15 <sup>th</sup> – Mar 15 <sup>th</sup>	PRC
Stakeholder comment period	Mar 15 <sup>th</sup> – Apr 15 <sup>th</sup>	Stakeholders
Draft Workplan revision	Apr 15 <sup>th</sup> – May 15 <sup>th</sup>	PRC
Draft Workplan sent to Board	May 15 <sup>th</sup>	PA
Board approval of Workplan	Jun 1 <sup>st</sup>	Board
Final Revisions (as needed)	Jun 1 <sup>st</sup> – Jun 15 <sup>th</sup>	PRC

# BPM 301 COMMENTS & EDITS

## *STAKEHOLDER PROCESS – WORKPLAN DEVELOPMENT & APPROVAL*

- » Noted that nothing changes the authority of the independent Board over all aspects of the WRAP – *Added in all 300 series BPMs*
- » Comments requested additional clarification and detail – clarification was added, but we mostly refrained from addition of criteria or specificity (favoring requiring parties to communicate criteria utilized, instead)
- » Received comment requesting the ability to make changes (especially during the transition period) without going through the entire process
  - Solution: Lead Sponsor can flag a change as a “Non-Task Force Proposal” – for items so straightforward or fleshed out they do not require a Task Force

# BPM 301 NOTES

## STAKEHOLDER PROCESS – WORKPLAN DEVELOPMENT & APPROVAL

BPM	PRC Endorsement		RAPC Endorsement	
<b>101</b> – Advance Assessment	11/6	<i>unanimous</i>	11/9	<i>unanimous</i>
<b>109</b> – Forward Showing Transition Period	10/18	<i>unanimous</i>	10/26	<i>unanimous</i>
<b>210</b> – Operations Program Transition Period	11/6	<i>unanimous</i>	11/9	<i>unanimous</i>
<b>301</b> – PRC Workplan Development and Approval	11/29	<i>unanimous</i>	11/30	<i>unanimous</i>
<b>302</b> – PRC Proposal Development and Consideration	11/29	<i>unanimous</i>	11/30	<i>unanimous</i>
<b>303</b> – Expedited Review Process	11/15	<i>unanimous</i>	11/30	<i>unanimous</i>



# BPM 302 OVERVIEW

## *STAKEHOLDER PROCESS – PROPOSAL DEVELOPMENT & CONSIDERATION*

- » Once the Board has approved a Workplan, the PRC will identify task forces to refine requested changes into full Proposals - each task force will determine their own governance and structure
- » Completed proposals are posted for public comment (Task Force is responsible for resolving comments)
- » COSR has a separate comment period following public comment window (again, Task Force resolves comments)
- » After PRC vote to endorse, Proposal moves to RAPC for review and vote.
  - RAPC approval without change: COSR has one week to flag opposition, RAPC required to engage
  - RAPC rejects: Proposal terminates (can be resurrected by request to PA within two weeks of vote)
  - RAPC approves the Proposal with changes (requires a higher voting threshold than accepting without changes); COSR has two weeks to flag opposition and/or require an additional public comment period on updated Proposal prior to Board review
- » Board review of proposals
  - If Board does not choose to approve the proposal as procided, can make changes or can send back to any stage of the process (discretion) with guidance

# BPM 302 COMMENTS & EDITS

## *STAKEHOLDER PROCESS – PROPOSAL DEVELOPMENT & CONSIDERATION*

- » Noted that nothing changes the authority of the independent Board over all aspects of the WRAP – *Added in all 300 series BPMs*
- » Added 'Non-Task Force Proposal' concept (allowing a concept to bypass workplan and task force development)
- » Comments provided on adding clarification and detail
  - Comments on adding more prescriptive detail were de-prioritized in favor of flexibility (allowing the PRC to guide task force management, the task force to guide release schedules based on proposal type)
- » WPP has worked with PRC to develop a template for Proposals
  - *Not included in the BPM*
- » At least two weeks of public comment – additional length determined by Task Force
- » Did not change COSR opportunities to engage – per earlier COSR negotiations

# BPM 302 NOTES

## STAKEHOLDER PROCESS – PROPOSAL DEVELOPMENT & CONSIDERATION

BPM	PRC Endorsement		RAPC Endorsement	
<b>101</b> – Advance Assessment	11/6	<i>unanimous</i>	11/9	<i>unanimous</i>
<b>109</b> – Forward Showing Transition Period	10/18	<i>unanimous</i>	10/26	<i>unanimous</i>
<b>210</b> – Operations Program Transition Period	11/6	<i>unanimous</i>	11/9	<i>unanimous</i>
<b>301</b> – PRC Workplan Development and Approval	11/29	<i>unanimous</i>	11/30	<i>unanimous</i>
<b>302</b> – PRC Proposal Development and Consideration	11/29	<i>unanimous</i>	11/30	<i>unanimous</i>
<b>303</b> – Expedited Review Process	11/15	<i>unanimous</i>	11/30	<i>unanimous</i>

# BPM 303 OVERVIEW

## *STAKEHOLDER PROCESS – EXPEDITED REVIEW*

- » Expedited Board review of amendments to the WRAP Tariff or BPMs can take place if the RAPC determines there are exigent circumstances:
  - FERC-mandated amendments, amendments to address immediate reliability impacts, or amendments with significant impacts to utility service
- » RAPC will develop and endorse a Proposal and a review schedule, to be followed by a PA/PO feasibility review
- » Public, PRC, COSR provide comment concurrently with Board review
  - COSR opposition can require one RAPC public discussion, so long as it does not hinder timely Board review
- » Board determines whether to approve or deny expedited change
  - If Board approves a changed version, RAPC will convene to counter approve the changed version (or provide updates to the board for further consideration)

# BPM 303 COMMENTS & EDITS

## *STAKEHOLDER PROCESS – EXPEDITED REVIEW*

- » Noted that nothing changes the authority of the independent Board over all aspects of the WRAP – *Added in all 300 series BPMs*
- » Comments provided on adding clarification and detail
- » Added that WPP will try to get the Expedited Proposal on the website for public comment at least two weeks prior to Board Review - comments then supplied to the Board
- » Board Review
  - RAPC requested that changes by the Board are brought back to RAPC for consideration and co-endorsement prior to making a 205 filing/BPM update
  - Board requested that it can return to RAPC with suggested (rather than actual) changes

# BPM 303 NOTES

## *STAKEHOLDER PROCESS – EXPEDITED REVIEW*

BPM	PRC Endorsement		RAPC Endorsement	
<b>101</b> – Advance Assessment	11/6	<i>unanimous</i>	11/9	<i>unanimous</i>
<b>109</b> – Forward Showing Transition Period	10/18	<i>unanimous</i>	10/26	<i>unanimous</i>
<b>210</b> – Operations Program Transition Period	11/6	<i>unanimous</i>	11/9	<i>unanimous</i>
<b>301</b> – PRC Workplan Development and Approval	11/29	<i>unanimous</i>	11/30	<i>unanimous</i>
<b>302</b> – PRC Proposal Development and Consideration	11/29	<i>unanimous</i>	11/30	<i>unanimous</i>
<b>303</b> – Expedited Review Process	11/15	<i>unanimous</i>	11/30	<i>unanimous</i>