



## Western Resource Adequacy Program Change Request Form

### Lead Sponsor Information

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### Co-Sponsors Information (optional)

Name:	Organization:
Phone Number:	Email:
Name:	Organization:
Phone Number:	Email:
Name:	Organization:
Phone Number:	Email:

### Type of Change Requested

Check one:

- Correction (*i.e., revising erroneous language or language that needs clean-up for grammatical errors or inconsistency across governing documents - no changes to intent or policy*)
- Clarification (*i.e., revising language to better represent existing intent, no changes to functionality or policy*)
- Enhancement (*i.e., revising language to expand upon existing intent or functionality*)
- New Protocol, Business Practice, Criteria, Tariff (*i.e., new language to accommodate new functionality or policy not existing today*)
- Change (*i.e., a change in the existing policy – will replace an existing language*)
- Other (*i.e., changes that do not fall into the categories listed above*)

### Description of Change

Provide a description of the issue:

The Tariff requires a series of corrections to erroneous language to align with intended policy. As described below, some of the corrections will not affect other governing documents, while other corrections need to be made to allow the following Business Practice Manuals (BPMs) to be considered for Board approval:



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- BPM 102 Forward Showing Reliability Metric
- BPM 103 Forward Showing Capacity Requirement
- BPM 106 Qualifying Contracts
- BPM 202 Participant Sharing Calculation Inputs
- BPM 204 Holdback Requirement
- BPM 205 Energy Deployment

Please provide the following information if known and/or available.

1. Provide a proposed solution to the issue described:

The following list of proposed corrections (with specific language included in the attached red-lined Tariff) are not intended to directly affect BPMs unless indicated, nor do they change intent or policy.

Tariff Section	Description of Tariff Correction	Impacted BPM(s)
1. Definitions	Add previously absent definitions of "Operations Program", "Aggregate Capacity Deficiency", "Central Hub", "Demand Response Load Modifier", "Holdback Capacity", "Voluntary Holdback". Removed definition of "Sharing Requirement"	
1. Definitions – CONE Factor	Complete the definition by addressing repeated deficiencies in sequential years	
1. Definitions – Demand Response	Change from "Demand Response" to "Demand Response Capacity Resource". Clarifies resource as defined is used exclusively to meet a Participant's FS Capacity Requirement	
1. Definitions – Portfolio QCC	Complete the definition with the addition of RA Transfers and the deduction of Planned Outages	
1. Definitions – System Sale	Remove reference to "Qualified Resources" to enable potential System	BPM 106



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	Sales from non-Participants for which resource registration is impractical	
7. Credit Requirements and Settlement for Holdback and Delivered Energy	Add a 90-day "statute of limitations" repose period for settlement prices and limit what aspects of settlement prices may be disputed	BPM 206 and BPM 207
10.2 Treatment of Confidential or Commercially Sensitive Information	Add language to reflect that WPP will treat certain Participant-specific information it receives from Participants as confidential or commercially sensitive by default, with the list of categories of such data provided in BPM 402	BPM 402
14.2.1.2, 16.1.5, 19.2 – sections relating to Forward Showing Submittal demonstration of inter-subregional transmission in lieu of Capacity	Removed requirement that Participants demonstrating transmission between subregions to utilize the lower FSPRM 'offer' those transmission rights for use in the Operations Program; this concept was not intended to be as prescriptive as the Tariff previously required	
16.1.2.1, 16.1.2.3, 16.2.5.2.2 Forward Showing Planning Reserve Margin	Correct any references from an "annual LOLE" to a "Seasonal LOLE"	BPM 102
16.1.2, 16.2.5.4, and 20.1.1	Providing Participants with three mutually exclusive options for demand response: 1) leave in historical load; <u>or</u> extract from historical load and either: 2) deduct from monthly P50; or 3) use to meet FS Capacity Requirement	BPM 103
16.2.7 Total RA Transfer	Correct definition of "Total RA Transfer" so the selling Participant is transferring some of its Portfolio QCC (not FS Capacity Requirement) to the	BPM 106



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	purchasing Participant to aid the latter in meeting its FS Capacity Requirement; FS Capacity Requirement or portions of it are not being transferred	
16.2.8 Planned Outages	In addition to a request for information on Qualifying Resources with planned outages that are out of service but scheduled to return <i>during</i> the Binding Season, extend request to Qualifying Resources returning to service <i>after</i> the Binding Season	
16.3.2 Transmission Exceptions	Move language from below 16.3.2.4 so that it is more clearly related to this parent section, with no changes made to the text itself	
17.2.7 and 17.2.8 Forward Showing Deficiency Charge	Add "less than or equal to" language that allows for % Deficits to potentially be exactly 1%, 2% or 3%	BPM 107
17.2.9 Forward Showing Deficiency Charge	Edit to make clear that the CONE Factor shall be set to 200% for a Participant with either Summer or Winter deficiencies in the previous Forward Showing Year (not for all Participants, as could have been implied); conforming change made to 17.2	BPM 107
19.1 Operations Program Timeline and Supporting Information	Change the first sentence to "The Operations Program includes a Multi-Day-Ahead Assessment which will look ahead the next seven Operating Days" making it less ambiguous and clear that it is forward-looking	BPM 201
19.1 Operations Program Timeline and Supporting Information	Add more summarizing detail to provide context and corrected the	BPM 201

	<p>sentence “WPP shall prepare and post a forecast for the Operating Day” to state that forecasts will be provided by Participants and used to calculate an indicative Sharing Calculation result</p>	
<p>19.4 Operations Program Timeline and Participant transmission inputs</p>	<p>Remove language suggesting WPP and stakeholders would determine prioritization of transmission files (which are being provided by participants with associated prioritization assigned)</p>	<p>BPM 202</p>
<p>19.5 Operations Program Timeline and Supporting information &amp; 20.4.1.2 Energy Deployment</p>	<p>Correct all references from non-existent “Section 18.4” to “Section 19.4” relating to Subregions not containing a central transmission hub</p>	
<p>19.5 Voluntary offers in Operation Program</p>	<p>Update to correctly describe the mechanics of Voluntary Holdback</p>	<p>BPM 204</p>
<p>20.1.1 Sharing Requirement</p>	<p>Update Sharing Calculation with clarifying details:</p> <ul style="list-style-type: none"> <li>○ Correct order and signs in equation terms.</li> <li>○ Introduce terms to accurately account for the treatment of demand response as either a P50 load modifier or a capacity resource in the FS and as a corresponding reduction to the FS Capacity Requirement or Load Forecast in the Operations Program</li> <li>○ Account for Contingency Reserve Adjustments in the FS Capacity Requirement term</li> <li>○ Use FSPRM as a percentage instead of a MW amount to be</li> </ul>	<p>BPM 202</p>

	<p>consistent with earlier sections of the Tariff</p> <ul style="list-style-type: none"> <li>○ Replace <math>\Delta</math>CR with Contingency Reserves Obligation term to accurately account for the treatment of the hourly Contingency Reserves obligation in the Operations Program</li> <li>○ Remove term for Regional Transmission Diversity as transmission offered for inter-subregional sharing is not required to be offered by specific participants in the operating time horizon as previously contemplated.</li> </ul>	
20.1.3 Sharing Requirement	Remove references to Participants receiving lesser priorities of 'Energy Deployment' (should only be Holdback)	BPM 204 and BPM 205
20.2 Holdback Requirement	Update to correctly describe the mechanics of Holdback Requirement, including the pro-rata holdback allocation in Mid-C (subregion with a central transmission hub) and the optimized allocation in SWEDE (subregion without a central transmission hub) as well as the role of Voluntary Holdback as part of the Holdback Requirement.	BPM 204
20.4.1 Energy Deployment	Clarify how Energy Deployment occurs on the Operation Day	BPM 205
20.4.1.2 Energy Deployment & 21.1.4 Operations Program Settlements	Correct all references to "Section 19.3.1" to reference instead Section 19.4"	



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20.4.2-4 Energy Deployment	Change references from “120 minutes before the start of the hour” to “85 minutes before the start of the hour” and “80 minutes before the start of the hour”	BPM 201
20.8.1 Voluntary Response	Remove sentences referencing assistance following Transition Period priority tiers. This section incorrectly conflated “Raise Hand” feature with Voluntary Holdback.	BPM 204 and BPM 205
21.2.4	Update the Energy Declined Settlement price to be the Applicable Real-time Index Price for the hour	BPM 206
21.2.5 Make Whole Adjustment	Change the Make Whole Adjustment formula to be the maximum of zero or the result of the current formula so a surplus Participant is never required to “pay” the deficient Participant for the Make Whole Adjustment.	BPM 206
General Edits/Corrections	Minor clarifications, references, grammatical corrections, and additions of newly capitalized terms	

- 1. Provide the specific document and language you would like changed:**  
 Redlined Tariff edits are included as an attachment to this Change Request Form.
- 2. Provide a suggestion for how language could be updated to address issue:**  
 Redlined Tariff edits are included as an attachment to this Change Request Form.]

**Impact of Change**

Please provide the following information if know and/or available.

1. **Any data/information available that would characterize the importance or magnitude of the issue (allows for file attachments):**

The Tariff requires a series of corrections to erroneous language to align with intended policy. Some of the corrections will not affect other governing documents, while other corrections need to be made to allow certain BPMs to be considered for Board approval. None of the proposed corrections change intent or policy.

2. **Describe the benefits that will be realized from this change:**

The corrections to the Tariff will ensure it aligns with intended policy and allow certain BPMs to be considered for approval by the Board.

### Non-Task Force Proposal Request

A flag as a Non-Task Force Proposal indicates the Concept could be implemented without requiring further development into a Proposal by a Task Force. Please check the box below if you would like this to be considered as a Non-Task Force Proposal

- I would like this to be flagged as a Non-Task Force Proposal