

Participant	Name	Participant	Name
APS	Mike Eugenis	PacifiCorp	Ben Faulkinberry
Avista	Kevin Holland	PGE	Jonah Cabral
BPA	Suzanne Cooper	Powerex	Mike Goodenough
Calpine	Bill Goddard	PSE	Tricia Fisher
Chelan	Mike Bradshaw	PNM	Steve Maestas, John Mayhew
Clatskanie		SRP	Grant Smedley
EWEB	Megan Capper, Jon Hart	SCL	Siobhan Doherty, Mara Kontos
Grant	Rich Flanigan	Shell	Ian White
Idaho	Camille Christen, Ben Brandt	Snohomish PUD	
NorthWestern	Joe Stimatz	Tacoma	Leah Marquez Glynn
NV Energy	Lindsey Schlekeway	TEA	

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	
9:00	<ol style="list-style-type: none"> 1. Attendance 2. Anti-trust Statement 3. Approve Agenda <i>Grant moves and PNM seconds to approve the agenda. Calpine asks about Transition Proposal items brought from PAC prior to the meeting – the group will continue to discuss the existing transition proposal and PAC items at next meeting. WPP notes that an endorsement for 209 on the agenda be switched to discussion. The agenda is approved unanimously at 9:07 AM.</i> 4. Approve Minutes from last meeting <i>Calpine moves and NWE seconds to approve the minutes. Minutes are approved unanimously at 9:08 AM.</i>
PA/PO Report	
9:08	<ol style="list-style-type: none"> 5. PA/PO Update <i>Working to get BPMs updated.</i>
Ongoing Business	

	<p>6. Workgroup Updates</p> <ul style="list-style-type: none"> – Forward Showing Workgroup – <i>Beau B.</i> <i>SPP on site for EDST testing with WPP. Scheduling Participant EDST training beginning the week of the 20th – sessions on Tuesdays and Wednesdays. Migrating from Excel FS Workbooks to EDST. Reviewing cured workbooks for W24-25.</i> – Operations Workgroup – <i>Beau B.</i> <i>SPP working on deploying UF calculations in the Ops Client. Working on bugs. Applies 10% UF in Sharing Calculation. Shadow calculation tool available to Participants.</i> – Storage Hydro User group – <i>Dan O.</i> <i>Still meeting once a month, looking at how to submit storage hydro data for the cold weather event, to discuss later today.</i> – MBR Workgroup – <i>Mike W.</i>
9:13	<p>7. Business Practice Manual Updates Manual Updates</p> <p><i>WPP gives an overview of September BPM Items.</i></p> <ul style="list-style-type: none"> – Non-Task Force Proposal – <i>Update on Tariff Changes and Corrections (2024-NTFP-1)</i> <i>2024-NTFP-1 designed to provide corrections to allow for approval of remaining BPMs. COSR generally supportive with concerns over Participant comments on DR options. To discuss under BPM 103. Going to PRC for endorsement consideration on August 7th, and RAPC on August 15th. DR use as P50 peak load modifier is the only outstanding issue on NTFP.</i> – BPM 102 – Reliability Metric Setting - Discussion <i>At the PRC on July 17th the IOU sector brought up concerns that the BPM defines Subregions based on BAs and Load Resource Zones – an IOU sector member has requested the ability to change their Subregion more autonomously. Reached out to participants with MBR authority filings made with FERC (NVE or PAC) regarding the effect of softening requirement. Need to determine next steps. In discussion, Idaho Power expresses concern that by listing BAs in BPM 102, the program adds hurdles to entities wanting to change should they get new connectivity to another region. Within timeline constraints, change should be possible. Idaho is working on a specific proposal, discussing options with others in IOU sector. WPP provides an overview of how an entity can change their subregion in current process with NTFP – any process would require some lead time to facilitate modeling, current process requires it to be a governed decision involving the PRC, RAPC, and Board. SRP expresses desire for RAPC to weigh in on the process considering possible broader impacts on PRMs and ELCCs. SPP confirms there would be some impact on PRMs, and larger impacts on ELCCs. A change such as this may slow down the modelling process and generate concerns. Unless a process for impact assessment is added, those looking to change their subregion would not have that information before making a change. Hoping to endorse next Wednesday at the PRC. PAC</i>

asks whether the program should explore regular review of subregion boundaries and load/wind zones every 5-10 years. The BPM could include proactive reevaluation – may assist MBR filings. Next steps – IOU Sector to generate proposal.

– BPM 103 – FS Capacity Requirement – Discussion

WPP introduces the topics of discussion for BPM 103. 103 will return to RAPC for further discussion on August 15th and endorsement on August 29th. During the comment period, three issues of concern arose – Demand Response (DR), Load Growth Factors, and Load Exclusion. Three options for handling DR were considered by the Detailed Design Document – Leave effects of DR in Historical Load Data, Extract effects of DR by using Demand as a Qualifying Resource, Extract effects of DR by applying DR as a direct reduction to monthly P50 Peak Load Forecasts. Due to an oversight, only Option 1 and Option 2 made it into the Tariff. Following PRC and RAPC discussions, Option 3 was added to redlines of the Non-Task Force Proposal 2024-NTFP-1. Comments by Participants on 2024-NTFP-1 suggested opposition to including Option 3, citing unclear purpose, overstatement of capacity contribution, and undermining reliability. WPP asks whether the group consensus is to remove Option 3 from BPM 103 and NTFP – discussion will be summarized and sent to COSR.

In discussion:

- **Idaho** – Idaho has concerns over striking language, asks for clarification on how Option 3 results in an overstatement of capacity contribution.
 - o **Clarification by WPP**– Both options have the same demonstration requirements and capability test, but Option 2 is applied in the ledger of all resources against FS capacity requirement, while Option 3 is applied before PRM.
- **APS** – Root cause of 2020 blackouts in CA included a similar treatment of PRM – DR did not perform, and CA was unable to access what was planned to meet the 1 in 10 standard. APS sees Option 3 as hollowing out of 1 in 10 – giving a resource additional accreditation in one methodology versus another with no difference in the resource's performance. Distinct from Option 1 – reduction in load not visible to WRAP in WRAP context. Support for striking out Option 3, with possible room for modifying Option 3 to be incremental.
- **Idaho** – Option 3 allows Idaho to more accurately capture the value of the program – could use more frequently than used historically and target CCHs when needed. Idaho believes that focusing on correct incentives in the Operational program is crucial to solving discussed issues – Idaho will not demonstrate any resources in Forward Showing that cannot be called upon in Operations. Concern if Option 3 is struck that Idaho will not be able to get full credit for DR. Additional concern over lessening repercussions for failing to deliver.

- **Clarification by WPP** – In both Option 2 and Option 3, Participants will get credit for anticipated perfect usage, with the question being what it counts against – whether it further reduces required capacity/what the MW value of that credit is. Option 2 and 3 are algebraically different. In Option 2, DR receives a QCC value of $1 \times \text{capacity value}$. In Option 3, DR receives a value (applied on the load side, but equivalent to QCC for purposes of explanation) of $(1 + \text{PRM}) \times \text{capacity value}$.
- **APS** – Option 3 adds PRM on top which you cannot perform to as a resource. Loss of Load study determines a capacity amount to meet the 1 in 10 standard. If DR is applied as a load modifier after the capacity amount is derived in the LOLE, that amount of capacity cannot actually show up for the region. Region accepts a lower standard of reliability than the 1-in-10 LOLE intended.
- **BPA** – Want to make sure DR is accredited correctly. When you modify load with DR, you're saying you will deploy at any hour – not reality in Operations. Shifting risk to others in the program. If we want the load modifier, everyone must use it to ensure all are on the same footing – can't have both Option 2 and Option 3
- **SRP** – Aligned with APS, cannot see Option 3 as equivalent to Option 2 in its current state. Suggest constructing simple example to show how the different options work with load and resources.
- **WPP, Next steps** – Given that this NTFP is focused on corrections, hesitate to create new policy (e.g. significantly modifying Option 3) in this proposal. If further discussions are required, a change can be sponsored by a stakeholder and a task force can consider additional proposals for DR treatment in future.
- **Idaho** – Not a major sticking point for Idaho, but concerns about not adequately receiving credit for resources in Forward Showing. Will not pursue a modified Option 3.
- **WPP, Next steps** – Cleanest path forward is to take it out. Committed to making sure that Participants get credit for DR (through options 1 and 2), willing to have further discussions over a modified Option 3 moving forward – will see growth in DR.
 - **SRP, APS** – Support striking Option 3
- **APS** – See three paths moving forward – removal of Option 3, limit Option 3 to incremental load modifier until it works into Option 1 or treat with same capacity as Option 2 i.e. no artificial increase of PRM – no accreditation higher than capability to perform. Are there preferences for one path over others?
- **PAC** - Seeking clarification – Option 2 means in Operations Program it would be expected to be outage data if not available, whereas in Option 3 the last time seen by the program is in the Forward Showing?
 - **Clarification by WPP** – The treatment in of Option 2 and Option 3 is the same, Participants cannot claim as outage or say it is unavailable. In theory the Operations Program indicates you deploy DR before accessing

Operations – though program never dictates which resources to use to meet load or Ops obligations (e.g. could use surplus or market purchases instead of deploying DR)

- **PAC** – WRAP testing requirements and DR representing small resource stack meant PAC was comfortable with Option 3. Need a fourth DR category in which DR contributes only to CR requirement. Not at point to submit change request to get fourth category, so if there is a reason an Option 4 would not exist, want Option 3 to be present. If there is a way to include or modify Option 3, PAC would support that.
 - o **Clarification by WPP** – Option 2 and Option 3 both get credit for anticipated perfect usage for DR, the question is what is “full credit” (how many MWs) in the Forward Showing. Need more robust conversation about what Option 4 would be. A broader conversation on Option 3 and Option 4 would be useful. Hesitancy to push Option 3 when have not pushed Option 4, not enough alignment – task force conversation may be prudent.
- **SRP** – Support WPP proposal to discuss Option 3 and Option 4 together and not push through NTFP, as the proposal was intended to include clarifications and not substantive policy changes.
 - o **Final note by WPP** – Modifications to Option 3 are beyond the scope of NTFP, suggestion to move NTFP forward without P50 Peak Load Modifier.

Load growth factor in BPM 103 pulled from Load Growth Task Force. More discussion to be had – likely after BPM 103 is in place. Anticipate a larger conversation with a Task Force and proposal for next PRC workplan.

Load exclusion. Non-Participants are trying to figure out if they participate under BPA and get asked to exclude or participate as their own entity. Working on capturing different reasons for why different participants would be looking to exclude load.

- BPM 106 – Qualifying Contracts – Discussion

Many comments on BPM 106 focused on why JCAFs are needed in certain situations. Edited to include more context for need of JCAF. PRC endorsement on the 7th, RAPC endorsement on the 15th. Slides address overarching comments for those who want less JCAFs, FERC precedent causing WRAP to settle with this requirement.
- BPM 209 – Energy Delivery Failure Charge – Endorse

PRC question about “Company-Wide authority” funneling to too high level – considering striking. WPP to check in with the Board to understand scope of concern and bring back to PRC. Question from SRP about including language on ‘financially binding’ – included to address concerns regarding personal gain – no

	<i>financial interest in getting the waiver approved. SRP – do RTOs have language to borrow? FERC counsel – language more generic in other RTOs than is sought by board.</i>
New Business	
11:10	<p>8. Cold Weather Event</p> <p><i>In March, RAPC requested evaluation of performance of WRAP during January cold weather event – data collection described in slides. SHUG opted for additional analysis of performance of storage hydro. The second data request considered QCC MW, Max Capacity, and Actual Generation. Per BPM 402, WPP is bringing the form and format of aggregated data to the RAPC to ensure no confidentiality concerns before it is released – RAPC has 2 weeks to object. Analysis generates proxy sharing calculation results, looking at the difference between load and actuals.</i></p>
External Affairs	
	[None]
Good of the Order	
11:16	<p>9. Participant topics requests for next meeting</p> <p><i>No topic requests from Participants.</i></p>
Closed RAPC	
11:19	10. Closed RAPC Session
Upcoming	
11:58	11. Next meeting: August 15 th
Meeting is adjourned at 11:58 PM.	

Current Participants: APS, Avista; BPA; Calpine; Chelan; Clatskanie; EWEB; Grant; Idaho Power; NorthWestern; NV Energy; PacifiCorp; PGE; Powerex; PNM; PSE; SRP; SCL; Shell; Snohomish PUD; Tacoma Power, The Energy Authority

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