

WPP Corporate Headquarters

7525 NE Ambassador Pl. Suite M
Portland, OR, 97220
Office: 503.445.1074
www.westernpowerpool.org
info@westernpowerpool.org

Thursday, July 18, 2024

Summary of Public Comments Received on 2024 Non-Task Force Proposal – 1

On June 21, 2024, the Western Resource Adequacy Program (WRAP) Program Review Committee (PRC) moved that the WRAP Tariff corrections submitted by Western Power Pool (Lead Sponsor) in a Change Request Form (CRF) be treated as a Non-Task Force Proposal (NTFP) per the change governance processes described in [Business Practice Manual \(BPM\) 301 PRC Workplan Development & Approval](#) and [BPM 302 PRC Proposal Development & Consideration](#).

The Tariff alterations proposed in the 2024-NTFP-1 CRF would address unintended omissions and change erroneous language to align with intended policy and allow the following BPMs to be considered for endorsement by the PRC and Resource Adequacy Participant Committee (RAPC), and then considered for approval by the Board of Directors:

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

The 2024-NTFP-1 CRF and associated Tariff redlines were made available for public comment between June 24, 2024, and July 9, 2024. Most comments made suggestions for clarification on the Tariff redlines and were incorporated as appropriate. Comments outside the scope of the 2024-NTFP-1 CRF (e.g. recommending policy changes or updates beyond those necessary to reflect prior discussions and intent) were not considered. The majority of stakeholder concerns related to language changes enabling *BPM 103 Forward Showing Capacity Requirement* and the treatment of demand response. Based on the RAPC-approved [Design Document](#), it was the intent that the Tariff capture three demand response options for participants to elect, but failed to capture the second option described below:

1. Leave the effects demand response embedded in the historical load data submitted to the WRAP; or
2. Extract the effects of demand response from historical load data and utilize it as a P50 Peak Load Modifier to reduce monthly load forecasts during the Binding Seasons before the Forward Showing Planning Reserve Margin (FSPRM) is applied; or
3. Extract the effects of demand response from historical load data and utilize it as a Qualifying Resource to meet Forward Showing Capacity Requirements (monthly P50 Peak Load Forecasts plus FSPRM).

The Tariff submitted to and approved by the Federal Energy Regulatory Commission (FERC) allows for the first and third options but does not address the second option. The Tariff redlines submitted for public comment attempted to include the second demand response option as efficiently as possible, but this led



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to a loss of clarity. In response to comments, the update Tariff redlines sections on demand response have been completely rewritten, with three new demand response definitions and explanations of how demand response may be treated as a participant P50 Peak Load Modifier (Section 16.1.3) or as a Qualified Resource (Section 16.2.5.4). WPP expects these changes will address the comments seeking clarification and suggesting rewrites of the proposed policy; these changes do not address the comments received advocating for *not* including the second option. WPP expects to facilitate further discussion in upcoming weeks (and as part of the endorsement and approval process) with commenters, RAPC, and PRC regarding the intent from the Design Document in allowing the second option.

Following the process outlined in *BPM 302*, the Lead Sponsor recommended to the PRC that the Committee of State Representatives (COSR) have a two-week comment period for 2024-NTFP-1. The PRC determined that a two-week comment period for the COSR was appropriate on July 17, 2024. The COSR has until July 31, 2024, to submit comments on 2024 NTFP-1.