



WESTERN RESOURCE ADEQUACY PROGRAM

September 19, 2024

2024-NTFP-1 and WRAP BPMs for Approval

BPM STATUS UPDATE

BPM	PRC Endorsement		RAPC Endorsement		Action
102 – FS Reliability Metric Setting	9/4	<i>unanimous</i>	9/12	<i>unanimous</i>	APPROVE
103 – FS Capacity Requirement	9/4	<i>unanimous</i>	9/12	<i>unanimous</i>	APPROVE
106 – Qualifying Contracts	9/4	<i>unanimous*</i>	9/12	<i>unanimous</i>	APPROVE
202 – Participant Sharing Calculation Inputs	9/4	<i>unanimous</i>	9/12	<i>unanimous*</i>	APPROVE
204 – Holdback Requirement	8/21	<i>unanimous</i>	8/29	<i>unanimous</i>	APPROVE
205 – Energy Deployment	8/21	<i>endorsed**</i>	8/29	<i>unanimous</i>	APPROVE
209 – Energy Delivery Failure Charge	8/21	<i>unanimous</i>	8/29	<i>unanimous</i>	APPROVE

NON-TASK FORCE PROPOSAL (NTFP)

BPM	Topic	Changes/Corrections Required*
102	Reliability Metrics	Tariff sections 16.1.2.1 and 16.1.2.3: Language requires adjustment to change "0.1 <i>annual</i> LOLE" to "0.1 <i>seasonal</i> LOLE"
103	FS Capacity Requirement	Tariff changes to properly reflect Contingency Reserve Adjustments in FS Capacity Requirement
106	Qualifying Contracts	Definitions: Change System Sales definition so all resources do not have to be registered Tariff section 16.2.7: Ensure RA Transfers are described as an exchange of QCC (not adjusting FS Capacity Requirement)
202	Sharing Calculations	Tariff section 20.1.1: Correct description of Contingency Reserves calculations in the Operations Program and sharing calculation
204	Holdback Requirement	Tariff section 20.3: Correct language about early release of surplus capacity Tariff section 20.8.1: Change raise hand association with Transition Period priority tiers
205	Energy Deployment	Tariff section 20.1.3: Change to only discuss priorities during insufficiencies in terms of Holdback Tariff section 20.8.1: Change raise hand association with Transition Period priority tiers

* See Change Request Form (NTF) and associated Tariff redlines for details

Staff recommends that the board approve 2024-NTFP-1 and that the Board direct staff to prepare and submit the FERC filings necessary to support the tariff changes contained in the proposal.

BPM 102 SUMMARY

FORWARD SHOWING – RELIABILITY METRIC SETTING

- » **How the PO runs the Loss of Load Expectation (LOLE) study**, including description of scope
 - Analyzes the ability of generation to reliability serve the WRAP region
- » **Use of Load Resource Zones (LRZs) to distinguish weather when modeling resources**
- » **How Qualifying Resources will be modeled**
- » **How the PO sets the Monthly FS Planning Reserve Margins (FSPRMs)**
 - LOLE for the applicable year does not exceed one event-day in 10 years for summer and winter seasons
 - Determined with probabilistic methods by altering capacity and forecast demand

2024-NTFP-1 CHANGE

- » **Tariff sections 16.1.2.1 and 16.1.2.3:**
 - Change “0.1 annual LOLE” to “0.1 seasonal LOLE”

BPM 102 COMMENTS & EDITS

FORWARD SHOWING – RELIABILITY METRIC SETTING

» **Significant Changes**

- Clarified Regional P50 Peak Load Forecast (BPM 102, LOLE) as distinct from Participant P50 Peak Load Forecast (BPM 103, FSPRMs)
- Process for changing Subregions

» **Discussions and Edits not made**

- WPP decided not to leave Subregion selection to the discretion of new Participants (will be part of a discussion)

BPM 102 NOTES

FORWARD SHOWING – RELIABILITY METRIC SETTING

Staff recommends that the board approve BPM 102, contingent upon FERC approval of the tariff changes in 2024-NTFP-1.

BPM	PRC Endorsement	RAPC Endorsement	Action
102 – FS Reliability Metric Setting	9/4 <i>unanimous</i>	9/12 <i>unanimous</i>	APPROVE
103 – FS Capacity Requirement	9/4 <i>unanimous</i>	9/12 <i>unanimous</i>	APPROVE
106 – Qualifying Contracts	9/4 <i>unanimous*</i>	9/12 <i>unanimous</i>	APPROVE
202 – Participant Sharing Calculation Inputs	9/4 <i>unanimous</i>	9/12 <i>unanimous*</i>	APPROVE
204 – Holdback Requirement	8/21 <i>unanimous</i>	8/29 <i>unanimous</i>	APPROVE
205 – Energy Deployment	8/21 <i>endorsed**</i>	8/29 <i>unanimous</i>	APPROVE
209 – Energy Delivery Failure Charge	8/21 <i>unanimous</i>	8/29 <i>unanimous</i>	APPROVE

BPM 103 SUMMARY

FORWARD SHOWING – FS CAPACITY REQUIREMENT

- » **Amounts of capacity (Portfolio QCC) a Participant is required to demonstrate for the months of a Binding Season**
- » **Monthly P50 Peak Load Forecast for a Binding Season** (using five years of historical load data from Advance Assessment)
 - Attest to significant loads added or removed
 - Apply load growth factor: WRAP-wide growth rate (currently 1.1%) or Participant alternative
- » **Contingency Reserve Adjustment:** FSPRM assumes average 6% peak load. FS Capacity Requirement adjustment considers each Participant's actual imports/exports and any Contingency Reserve contracts to ensure correct amount of capacity required
- » **Load Exclusion attestation**
- » **Annual Load Growth Factor and LOLE Study Load Growth** both currently set at 1.1%

2024-NTFP-1 CHANGE

- » **Updates to properly reflect Contingency Reserves Adjustments**

BPM 103 COMMENTS & EDITS

FORWARD SHOWING – FS CAPACITY REQUIREMENT

» **Significant Changes**

- Removed P50 Peak Load Modifier as a Demand Response Option
- Clarified Load Exclusion policy
- Examples of application of annual load growth factor

» **Discussions and Edits not made**

BPM 103 separately sets the annual load growth factors for both the regional LOLE Study and the Participant P50 Peak Load Forecasts to 1.1%. A load growth Task Force will likely be set up to explore a more advanced methodology for setting these percentages

BPM 103 NOTES

FORWARD SHOWING – FS CAPACITY REQUIREMENT

Staff recommends that the board approve BPM 103, contingent upon FERC approval of the tariff changes in 2024-NTFP-1.

BPM	PRC Endorsement	RAPC Endorsement	Action
102 – FS Reliability Metric Setting	9/4 <i>unanimous</i>	9/12 <i>unanimous</i>	<i>APPROVE</i>
103 – FS Capacity Requirement	9/4 <i>unanimous</i>	9/12 <i>unanimous</i>	<i>APPROVE</i>
106 – Qualifying Contracts	9/4 <i>unanimous*</i>	9/12 <i>unanimous</i>	<i>APPROVE</i>
202 – Participant Sharing Calculation Inputs	9/4 <i>unanimous</i>	9/12 <i>unanimous*</i>	<i>APPROVE</i>
204 – Holdback Requirement	8/21 <i>unanimous</i>	8/29 <i>unanimous</i>	<i>APPROVE</i>
205 – Energy Deployment	8/21 <i>endorsed**</i>	8/29 <i>unanimous</i>	<i>APPROVE</i>
209 – Energy Delivery Failure Charge	8/21 <i>unanimous</i>	8/29 <i>unanimous</i>	<i>APPROVE</i>

BPM 106 SUMMARY

FORWARD SHOWING – QUALIFYING CONTRACTS

- » **FS Capacity Requirements can be met with Net Contract QCC**
- » **Delivery requirements to Contract Capacity Firm Delivery Point**
- » **Resource-Specific Capacity Agreements**
 - QCC based on identified resource(s)
- » **System Sales**
 - QCC a function of Participant/Non-Participant Buyer/Seller permutations
 - Resources associated with qualified System Sales from sellers that are not Participants do not have to be registered (Tariff change)
- » **Joint Contract Accreditation Forms (JCAFs)**
 - Allow tracking of QCC entering, moving within, and leaving the region

2024-NTFP-1 CHANGE

- » **Change System Sales definition to avoid resource registration**
- » **Tariff section 16.2.7: Edited to clarify that RA transfers are transfers of QCC**

BPM 106 COMMENTS & EDITS

FORWARD SHOWING – QUALIFYING CONTRACTS

» **Significant Changes**

- Reduced administrative burden for Non-Participant resource-specific sales
- Aligned Transmission Attestation with Tariff regarding transmission rights

» **Discussions and Edits not made**

- There was a lot of discussion on the need for JCAFs for the various permutations of resource-specific contracts or system sales between non-participants and participants. The administrative burden associated with JCAFs was reduced while adhering to the requirements of the Tariff

BPM 106 NOTES

FORWARD SHOWING – QUALIFYING CONTRACTS

Staff recommends that the board approve BPM 106, contingent upon FERC approval of the tariff changes in 2024-NTFP-1.

BPM	PRC Endorsement	RAPC Endorsement	Action
102 – FS Reliability Metric Setting	9/4 <i>unanimous</i>	9/12 <i>unanimous</i>	<i>APPROVE</i>
103 – FS Capacity Requirement	9/4 <i>unanimous</i>	9/12 <i>unanimous</i>	<i>APPROVE</i>
106 – Qualifying Contracts	9/4 <i>unanimous*</i>	9/12 <i>unanimous</i>	<i>APPROVE</i>
202 – Participant Sharing Calculation Inputs	9/4 <i>unanimous</i>	9/12 <i>unanimous*</i>	<i>APPROVE</i>
204 – Holdback Requirement	8/21 <i>unanimous</i>	8/29 <i>unanimous</i>	<i>APPROVE</i>
205 – Energy Deployment	8/21 <i>endorsed**</i>	8/29 <i>unanimous</i>	<i>APPROVE</i>
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BPM 202 SUMMARY

OPERATIONS PROGRAM – PARTICIPANT INPUTS TO SHARING CALC

- » **Describes the data inputs used for the Sharing Calculation in the Operations Program**
 - Inputs from FS Submittal
 - Inputs from Participant in Operations Program
 - Input data file types
- » **Describes the Sharing Calculation equation and Sharing Results**
 - Compares Participant's FS Capacity Requirement to capacity need for each hour
- » **Describes forecasting methodology requirements for Participant data submitted in the Ops Program**
 - Types of forecasting tools
 - Narrative description required from Participants

2024-NTFP-1 CHANGE

- » **Tariff §19.4**
 - **Remove language suggesting WPP and stakeholders would determine prioritization of Tx files**
- » **Tariff §20.1.1:**
 - **Update Sharing Calculation with clarifying details – includes correction to how CRs are calculated**

BPM 202 COMMENTS & EDITS

OPERATIONS PROGRAM – PARTICIPANT INPUTS TO SHARING CALC

» **Significant Changes**

- Sharing calculation
 - › Added language in Forced Outages to account for any reduction in output capability for Energy Storage Resources
- References to Demand Response Load Modifier in sections 3 & 4 were removed to align with BPM 103 and NTFP.

» **Discussions and Edits not made**

- Construction delays to be considered as Forced Outages

BPM 202 NOTES

OPERATIONS PROGRAM – PARTICIPANT INPUTS TO SHARING CALC

Staff recommends that the board approve BPM 202, contingent upon FERC approval of the tariff changes in 2024-NTFP-1.

BPM	PRC Endorsement		RAPC Endorsement		Action
102 – FS Reliability Metric Setting	9/4	<i>unanimous</i>	9/12	<i>unanimous</i>	APPROVE
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BPM 204 SUMMARY

OPERATIONS PROGRAM – HOLDBACK REQUIREMENT

» **Outlines key processes associated with Participant Holdback Requirements in Ops Program**

» Details:

- Allocation of a Holdback Requirement to Participants for Subregions with a Central Hub and for Subregions without a Central Hub
- Process for opting in to Holdback Capacity and the release of capacity not claimed on the Preschedule Day
- Bilateral exchange of holdback
- Voluntary offers of capacity are assigned first
- Early release of surplus capacity

2024-NTFP-1 CHANGE

» **Tariff §20.3:**

- **Correct language about early release of surplus capacity**

» **Tariff §19.5 and §20.2:**

- **Correct description of mechanics of Holdback Requirement and specifically Voluntary Holdback**

BPM 204 COMMENTS & EDITS

OPERATIONS PROGRAM – HOLDBACK REQUIREMENT

» **Significant Changes**

- Participants with negative Sharing Calculation results are able to offer Voluntary Holdback
- Added Appendix A with a process for early release of surplus capacity including timeline, actions that need to be taken, metrics/decision criteria, and guidelines for the amount of surplus that could be released

» **Discussions and Edits not made**

- Request for more details about transmission requirements related to the Bilateral Exchange of Holdback

BPM 204 NOTES

OPERATIONS PROGRAM – HOLDBACK REQUIREMENT

Staff recommends that the board approve BPM 204, contingent upon FERC approval of the tariff changes in 2024-NTFP-1.

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102 – FS Reliability Metric Setting	9/4 <i>unanimous</i>	9/12 <i>unanimous</i>	<i>APPROVE</i>
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BPM 205 SUMMARY

OPERATIONS PROGRAM – ENERGY DEPLOYMENT

- » How deficient Participants can confirm an Energy Deployment after a request for Holdback Capacity
- » Describes guidance on scheduling and emergency events
- » Outlines after-the-fact Energy Deployment information required after a Sharing Event
- » Describes the Raise Hand Tool

2024-NTFP-1 CHANGE

- » **Tariff §20.4.1:**
 - Clarify how Energy Deployment occurs on the Operating Day
- » **Tariff §20.8.1:**
 - Remove sentences referencing assistance following Transition Period priority tiers. This section incorrectly conflated “Raise Hand” feature with Voluntary Holdback.

BPM 205 COMMENTS & EDITS

OPERATIONS PROGRAM – ENERGY DEPLOYMENT

» **Significant Changes**

- Added clarification to Sections 3.1 and 3.2 about responsibility for E-Tag creation and actions needed

» **Discussions and Edits not made**

- Request to clarify acceptable transmission priority for WRAP Holdback e-tags
- Abstentions related to Tx requirement

BPM 205 NOTES

OPERATIONS PROGRAM – ENERGY DEPLOYMENT

Staff recommends that the board approve BPM 209, contingent upon FERC approval of the tariff changes in 2024-NTFP-1.

BPM	PRC Endorsement		RAPC Endorsement		Action
102 – FS Reliability Metric Setting	9/4	<i>unanimous</i>	9/12	<i>unanimous</i>	APPROVE
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BPM 209 SUMMARY

OPERATIONS PROGRAM – ENERGY DELIVERY FAILURE CHARGES

- » **Returning from June 13 Board of Directors meeting**
- » Describes:
 - Evaluation of Delivery Failures
 - Calculation of the Delivery Failure Charge
 - Limits on maximum amount of the charge
 - The allocation of revenues received by WPP from payment of charges
 - Consequence of repeated Energy Delivery Failures
- » **Describes the circumstances for obtaining a waiver of the charge and the process by which WPP evaluates and grants waivers**

Significant Changes

- » **Provided Attestation language, and specified that attestation is made by an official appropriately removed from the direct financial impacts of Energy Delivery Failure Charges**
- » **Senior Executive Official:**
 - » "Senior executive or other official with **company-wide** authority to bind the company legally and financially."

BPM 209 NOTES

OPERATIONS PROGRAM – ENERGY DELIVERY FAILURE CHARGES

Staff recommends that the board approve BPM 209.

BPM	PRC Endorsement	RAPC Endorsement	Action
102 – FS Reliability Metric Setting	9/4 <i>unanimous</i>	9/12 <i>unanimous</i>	<i>APPROVE</i>
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