WESTERN POWERPOOL

Western Power Pool

Board of Directors Quarterly Meeting Agenda

September 25th, 2025, 9:00 AM – 10:30 PM PST

Location: WPP Office, Portland, OR, with Virtual Attendees on Microsoft Teams

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Invited Attendees:

Board: Bill Drummond, Doug Howe, Michelle Bertolino, Susan Ackerman, Andy Ott

Staff and Guests: Sarah Edmonds, Lisa Hardie, Rebecca Sexton, Ryan Roy, Eric Campbell, Carla Hudson, Maya McNichol (virtual), Michael O'Brien, Elise Mousseau (virtual), Danie Williams (virtual), Dave Zvareck (virtual)

Time	Topic	Presenters
08:45 AM	Pastries & Coffee Served	
09:00 AM	Meeting Opening • Call to Order • Determination of a Quorum • Approval of Meeting Minutes	*Bill, Susan*
09:05 AM	Public Comment	*Bill*
09:15 AM	Updates/Reports • CEO Report • Finance Committee Report	*Sarah, Michelle*
09:30 AM	WRAP Proposals • Discuss WRAP Summer 2027 and Winter 2027-2028 Advance Assessment Study Scope • Approve 2025-NTFP-1 Changes to BPM 108 Appendix A Attestation • Approve 2025-NTFP-2 Changes to BPM 108 Planned Outage Attestation	*Rebecca*

10:00 AM	Governance	*Lisa*

- Approve Board and Stakeholder Engagement Policy
- Approve Waiving Allied Partner Fees for Source.Training Subscribers

10:30 AM	Adjourn	Bill

Western Power Pool (WPP) Board of Directors Meeting
Meeting Minutes – Open Session
June 25th, 2025, 9:02 – 10:27 AM PT

Location: In-Person at the WPP Office in Portland, Oregon with Virtual Microsoft Teams Participants (as noted)

Attendees:

Board of Directors:	Bill Drummond (Chair), Doug Howe (virtual), Susan Ackerman, Michelle Bertolino, Andy Ott
Staff and Invited Presenters:	Sarah Edmonds, Rebecca Sexton, Lisa Hardie, Carla Hudson, Eric Campbell (virtual), Ryan Roy, Michael O'Brien, Kevin Conway, Justin Butler, Elise Mousseau (virtual), Beau Beljean (virtual), Maya McNichol (virtual), Charles Hendrix (virtual)
Other Attendees:	Rachel Dibble, Steve Bellcoff, Sachi Begur (virtual), Ben Fitch-Fleischmann (virtual), Tatum Bingham (virtual), Tim Bodell (virtual), Cait O-Reilly (virtual), Caleb Stovall (virtual), Edin Terzic (virtual), Gina Gargano-Amari (virtual), Greg Harrison (virtual), Brandon Holmes (virtual), Jacqueline Vogel (virtual), Peter Jimenez (virtual), Kyle Petty (virtual), Tyler Moore (virtual), Carly Page (virtual)

1. Call to Order
   The regular meeting of the Western Power Pool Board of Directors was called to order at 9:02 AM June 25th, 2025, by Chair Bill Drummond.

2. Determination of a Quorum
   Determination of a quorum was established by Secretary Susan Ackerman.

3. Agenda Approval
   The agenda was reviewed by the Board. Bill Drummond asked Sarah Edmonds if there were any changes to the agenda. Sarah Edmonds responded that there were not.

   A motion to approve the agenda was made by Michelle Bertolino and seconded by Andy Ott. The motion passed unanimously.

4. Approval of Meeting Minutes

   The previous meetings' minutes were reviewed by the Board.

   A motion to approve the March 13th, 2025, meeting minutes was made by Susan Ackerman and seconded by Michelle Bertolino. The motion passed unanimously.

5. Public Comment

   Bill Drummond asked for any public comments. None were provided.

6. CEO Report

   Sarah Edmonds reviewed the agenda for the day, highlighting staffing additions to the WPP that have influenced the budget being approved and the change from fiscal year to calendar year. She also shared that Rebecca Sexton has been promoted to Chief Strategy Officer and welcomed new employee Justin Butler, Principal Operations Advisor.

7. Financial Report

   Michelle Bertolino reported that the Finance Committee met three times since the last Board Meeting and had reviewed proposed budgets, monthly income statement, balance sheet, A/R aging reports and that those all looked good. She shared that they were updated on FERC filings, fiscal year to calendar year change, and WPP procedures and processes.

8. WRAP Proposals

   a. Approve 2025/2026 PRC Workplan

      Rebecca Sexton introduced Michael O'Brien who gave the presentation on the PRC Workplan. He summarized the workplan development process, the updated workplan schedule, and task force rosters. He also summarized in detail the four task forces that were proposed for 2025, which included the Earlier FS Metrics, DAM Optimization, CAISO Firm Transmission, and Demand Response QCC. The Board had additional discussion around optimization of day ahead markets and the relationship to transmission limits. Michael O'Brien informed the board that they were being asked to approve the Workplan which would trigger implementation and proposal development.

A motion to approve the 2025/2026 WRAP Program Review Committee Workplan was made by Andy Ott and seconded by Susan Ackerman. The motion passed unanimously.

Rachel Dibble from BPA complimented the WPP staff on leading this process and expressed BPA's support.

b. Review Winter 2026-2027, Winter 2029-2030 (advisory) Advanced Assessment Results Presentation

Charles Hendrix from the Southwest Power Pool presented the Advanced Assessment Results, highlighting that approval was being sought of the Planning Reserve Margin (PRM) and that the presentation would include additional information on QCC values and effective load carrying capabilities.

c. Approve Winter 2026-2027 Planning Reserve Margins Memo

Rebecca Sexton reviewed the Planning Reserve Margins Memo and noted that the Planning Reserve Margin presentation would be available on the WPP website. She requested approval of PRMs presented by Charles Hendrix in the presentation.

A motion to approve the Winter 2026-2027 Planning Reserve Margins was made by Michelle Bertolino and seconded by Susan Ackerman. The motion passed unanimously.

d. Approve Authorization to Renegotiate SPP Payment

Rebecca Sexton reviewed the Authorization to Renegotiate SPP Payment, highlighting that this is an evergreen contract, that originally it was expected that costs would drop, but that it was deemed reasonable due to needed changes and upgrades to systems, as requested by participants, for the cost to increase. Lisa Hardie added that with the passage of the signature authority policy that the Board recently approved that Board approval was required for this amount since it was above the limit set in the policy for staff approval.

A motion to approve the Resolution to Modify Payment to WRAP Program Operator was made by Susan Ackerman and seconded by Andy Ott. The motion passed unanimously.

Steve Bellcoff from BPA confirmed that participant requests for changes and upgrades were being made, including those from the BPA.

9. Finance
    a. Approve WPP Budget

    Rebecca Sexton presented the proposed WPP Budget, noting that WPP is transitioning from the fiscal to the calendar year and for that reason this is an 18-month budget. She reviewed the budget assumptions, noting that there are no significant increases in O&M budgets and that there was a total 4.3% increase relative to the budget approved by the Board in December of 2024. Ryan Roy noted that this budget had been presented to WPP program committees and had been unanimously approved.

    A motion to approve the 2025-2026 WPP Budget was made by Michelle Bertolino and seconded by Andy Ott. The motion passed unanimously.

    Michelle Bertolino thanked the staff for their work on this budget, noting that it is not an easy process during this fiscal year to calendar year change. Bill Drummond asked for any additional comments from the audience. There were no additional comments.

10. Governance
    a. Approve Corporate Compliance Policy

    Lisa Hardie reviewed the Corporate Compliance Policy, noting that historically this type of compliance took place at the program level and that this policy was intending to memorialize compliance at a corporate level.

    A motion to approve the Corporate Compliance Policy was made by Andy Ott and seconded by Susan Ackerman. The motion passed unanimously.

    b. Approve Bylaw Calendar Year Changes

    Lisa Hardie reviewed the Bylaw Calendar Year Changes, reflecting the change from the fiscal year to the calendar year.

    A motion to approve the WPP Bylaw Calendar Year Changes was made by Michelle Bertolino and seconded by Susan Ackerman. The motion passed unanimously.

11. Adjourn

The regular meeting of the Western Power Pool Board of Directors was adjourned at 10:27 AM, June 25th, 2025, by Chair Bill Drummond.

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Susan Ackerman, Secretary

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Date Signed

Western Resource Adequacy Program 2027 Summer and 2027-2028 Winter Advance Assessment Scope of Work

SPP Resource Adequacy

WPP
Western Resource
Adequacy Program

DATE OR VERSION NUMBER	AUTHOR	CHANGE DESCRIPTION	COMMENTS
4/25/2025	SPP Staff	draft	Draft to WPP (8/29/2025)
9/3/2025	WPP Staff	Modified with edits/comments/questions	WPP edits to SPP (9/3/2025)
9/4/2025	SPP/WPP Staff	Finalized outstanding items	FINAL

Contents

1. Introduction

For the 2027 Summer and 2027-2028 Winter Season of the Western Power Pool (WPP) Western Resource Adequacy Program (WRAP), Loss of Load Expectation (LOLE) and Effective Load Carrying Capability (ELCC) studies will be performed for the determination of Planning Reserve Margin (PRM) and provide Qualifying Capacity Contribution (QCC) for wind, solar, energy storage, Run-of-River (ROR), demand response and thermal resources. The Program Operator is Southwest Power Pool (SPP) in this scope of work.

2. Time Frames and Deliverable Timelines

2.1. LOLE Timeframes and Deliverable Timelines

The 2027 Summer and 2027-2028 Winter Season LOLE study will be performed for the following seasons and timeframes:

Season/Scenario ID	**Season**	**Season Dates**
1	Summer 2027	June 1, 2027 – September 15, 2027
2	Summer 2030	June 1, 2030 – September 15, 2030
3	Winter 2027-2028	November 1, 2027 – March 15, 2028
4	Winter 2030-2031	November 1, 2030 – March 15, 2031

The following tasks are required for the LOLE Study.

- Summer 2027 and Summer 2030 Seasons

Task	**Date**	**Responsible Party**
Model development and LOLE simulations	April-October 2025	Program Operator
Draft Results	September 15, 2025	Program Operator
Final Results	October 31, 2025	Program Operator
Final LOLE report	December 31, 2025	Program Operator

- Winter 2027-2028 and Winter 2030-2031 Seasons

Task	Date	Responsible Party
Model development and LOLE simulations	October 2025 – March 2026	Program Operator
Draft Results	February 15, 2026	Program Operator
Final Results	March 31, 2026	Program Operator
Final LOLE report	May 31, 2026	Program Operator

2.2. ELCC Timeline and Deliverable Timeframes

The ELCC study will be performed for the following seasons and timeframes:

Season/Scenario ID	Season	Season Dates
1	Summer 2027	June 1, 2027 – September 15, 2027
2	Winter 2027-2028	November 1, 2027 – March 15, 2028

The following tasks are required for the wind, solar, and energy storage ELCC studies.

- Summer 2027

Task	Date	Responsible Party
ELCC Simulations	April-October 2025	Program Operator
Draft Results	September 15, 2025	Program Operator
Final Results and QCC provided to participants	October 31, 2025	Program Operator
Final ELCC report	December 31, 2025	Program Operator

- Winter 2027-2028

Task	Date	Responsible Party
ELCC Simulations	October 2025 – March 2026	Program Operator
Draft Results	February 15, 2026	Program Operator
Final Results and QCC provided to Participants	March 31, 2026	Program Operator
Final ELCC Report	May 31, 2026	Program Operator

3. Software Used

The SERVM software will be used to model and simulate LOLE and ELCC studies as described in this scope of work. This will be the first study set to use Version 10 of SERVM. The previous study set was conducted using Version 9. Main relevant differences are improved processing speeds, reporting and outage handling. Backtesting of previous studies resulted in similar (within 1%) PRMs and ELCC values. The slight difference can be attributed to improved accuracy in algorithims used by SERVM.

4. LOLE Study

4.1. LOLE Introduction

The LOLE will be studied such that the LOLE (while maintaining 6% Contingency Reserves) for the applicable planning year does not exceed one event-day in 10 years for the Summer season and one event-day in 10 years for the Winter season.

4.2. Area Modeling

For the LOLE study, the WRAP footprint will be modeled as nine (9) Load Resource Zones (LRZs) to consider weather variability across the fooprint. The load and resources of an individual LRZ will be modeled as a "bubble" representing each zone. For the LOLE simulations, import and export capabilities ("pipe sizes") between LRZs will not be constrained when determining the WRAP footprint PRM value. After the WRAP footprint PRM value has been found, the nine (9) LRZs will be aggregated into two (2) WRAP Subregions, a Northwest Subregion (MIDC) and Southwest and East Subregion (SWEDE), and an analysis of each Subregion will be performed.

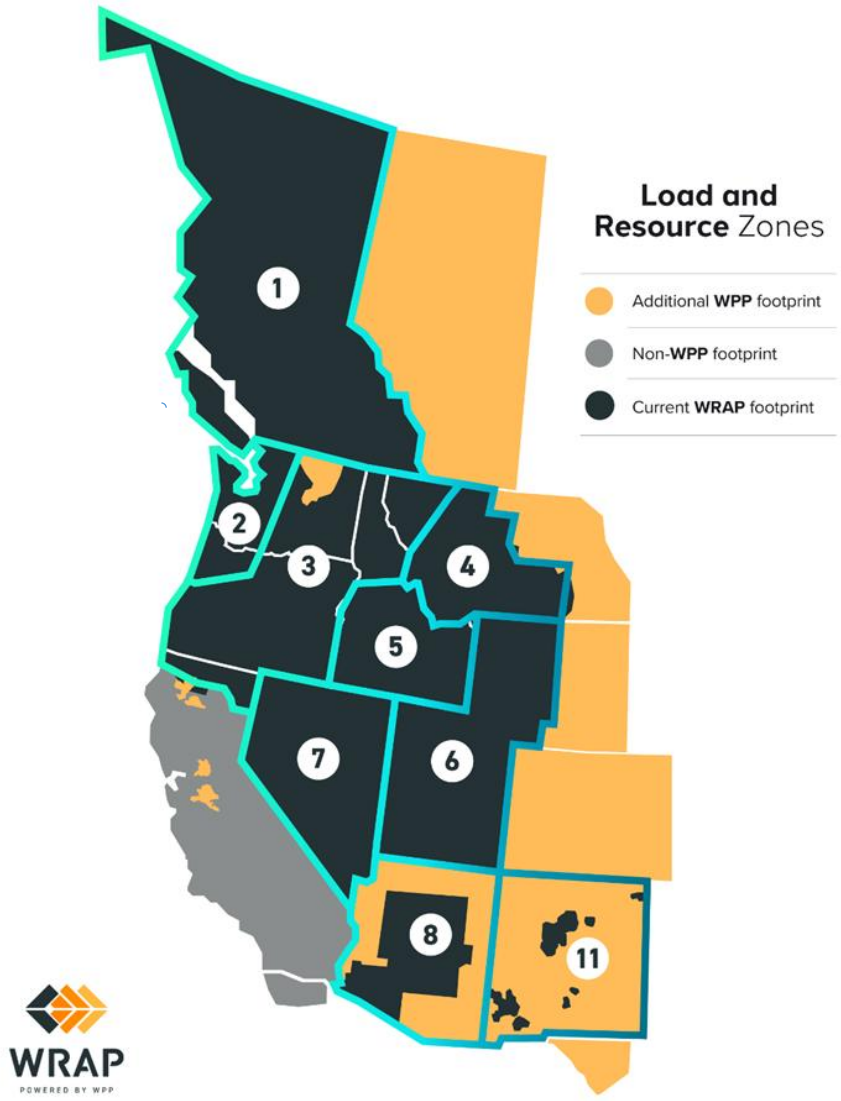

Figure 1. WRAP Load and Resource Zones

4.3. Load Modeling

A minimum of forty-five (45) weather years of data through 2024 will be used for hourly load modeling in the study. For years 1980-2019, historical load shapes are synthesized using 2020-2024 hourly historical data, provided by Participants' March 2025 data submissions.

The purpose of modeling all weather years back to 1980 is to deploy a comprehensive model of extreme events/anomalies in order to capture an expansive assessment of risk to reliability. Synthetic load shapes are created using Astrape's proprietary Neuro Shell software to "train" historical data and historical hourly temperatures recorded at 9 primary weather stations; one for each LRZ. Secondary weather stations are utilized when primary weather station data is incomplete or not recorded. Hourly load shapes from 2020 to

2024 use actual historical hourly loads. Hourly load shapes are used for the hourly dispatch in the SERVM model using a seasonal load scaling based on seasonal peaks for each respective LRZ.

4.4. Generation Modeling

4.4.1. Thermal Generators

Thermal generators will be modeled as units at their installed tested maximum capacity with forced outages applied as necessary in accordance with their Equivalent Demand forced outage rate (EFORd). Updates to thermal resource data will be provided by the Participants in the Excel format and will include the following parameters that may be necessary for dispatching units on a 'commit-all' basis.

Thermal Generator Parameters
Capmax (summer)
Capmax (winter)
Fuel Type and Technology Type
In Service Date
Retirement Date
Load Resource Zone

Forced outage modeling for thermal resources will consist of using the EFORd values (EFORd equation as defined by NERC GADS), forced outage durations and outage events sourced from NERC GADS (or equivalent) data provided by the Participants. For thermal resources where such data is not provided, an average forced outage rate will be calculated and applied based on size, fuel type, and technology type of the resource using the provided NERC GADS data. If there is no available information based on size, fuel type, and technology type, then NERC published values can be used in their place at the discretion of the Program Operator and shall be noted. No planned or maintenance outages will be modeled. A "commit all" approach will be used for the analysis, meaning all resources will be treated as available and dispatched every hour the resource is not on outage.

4.4.2. Storage Hydro

The WRAP Storage Hydro QCC Methodology will establish QCC values for all storage hydro plants on a monthly basis. For the LOLE and ELCC studies, storage hydro plants will be modeled at their QCC values for each month. The methodology utilized to assess QCC values for hydro facilities accounts for the availability of storage such that in the LOLE modeling, it is appropriate to assume the facility has enough stored energy to output the monthly QCC value for each hour in the simulation.

4.4.3. Wind, Solar, Energy Storage, and Run-of-River Resources

Actual or synthesized hourly data for wind, solar, and run-of-river resources for the years under study will be used.

4.4.3.1. Wind Resources

New wind resources provided by Participants will be included and modeled as one value per wind VER zone. Operational and synthesized wind data will be utilized for the analysis, which was dervied from taking historical profiles from 2015-2024 for wind resources and matching with daily profiles from 1980-2014 that best aligned with peak load profile +/- 25 days of the source day that was available for the 10-year period.

4.4.3.2. Solar Resources

New solar resources and any solar resources that have little or no operational data will use operational and synthesized irradiance data for resources in close proximity that have been synthesized previously. Solar profiles were developed using irradiance and weather data that was obtained for each solar site, defined in Figure 2, for the years 1998-2023 from the National Renewable Energy Laboratory's (NREL) National Solar Radiation Database (NSRDB) Data Viewer. Irradiance data is the input into the NREL System Advisor Model (SAM) for each year and site to generate 8,760 hourly profiles. Profiles from 1980-1998 were selected by using the daily profiles from the day that best matched the peak load out of all the day +/- 3 days of the source day of the 10 year period from 2015-2024.

Figure 2. Solar Profile Locations

4.4.3.3. Energy Storage Resources

Energy Storage Resources (ESRs) include Battery Energy Storage (BES) and Pumped Storage Hydro (PSH). Both BES and PSH will be modeled as energy limited devices that will charge and discharge in accordance with their equipment specifications. ESRs will be modeled to charge and discharge in a 'preserve reliability' mode, which means they will only be discharged as a consequence when there is a lack of any other resources available to serve load. ESRs will be discharged prior to Demand Response Programs.

4.4.3.4. Run-of-River Resources

New run-of-river resources provided by Participants will be included and modeled as one value per LRZ. Operational and synthesized run-of-river data will be utilized for the analysis, which was dervied from taking historical profiles from 2015-2024 for run-of-river

resources and matching with daily profiles from 1980-2014 that best aligned with peak load profile +/-25 days of the source day that was available for the 10 year period.

4.4.4. Demand Response Programs

The model will include properties and values of Demand Response (DR) Programs provided by Participants. Programs will be modeled as equivalent thermal resources to be added to the model with high fuel costs, such that these representative "thermal" resources would be dispatched last by the model to reflect DR operating scenarios. Forced outage rates will not be assigned to the DR Programs. DR Programs that are implicit in a participant's historical load profile will not be modeled as a resource in SERVM.

4.4.5. External Capacity Modeling

Firm external imports and exports will be modeled based on external transactions submitted by the Participants. A synthesized non-firm interchange schedule between the WRAP Region and external areas are not modeled in the Advance Assessment.

4.5. Treatment of Contingency (Operating) Reserves (CR)

In accordance with NERC reliability standard BAL-002-WECC-2a, Balancing Authority Areas' total contingency reserve (CR) needs are based on the requirement to carry reserves on three percent (3%) of hourly integrated load and three percent (3%) of hourly integrated generation. The LOLE study will assure that during events tallied as loss of load that all contingency reserves are maintained. To ensure this, the LOLE study will assume an average six percent (6%) CR requirement when determining the capacity requirements to maintain the 1 day in 10-year LOLE requirement.

4.6. Determination of 1 Day in 10-year threshold

For the LOLE study, loss of load events will be tabulated during the hours of the binding season for determination of the 1 day in 10-year LOLE metric. Loss of load events that occur during hours outside of the binding season will not go into the calculation of LOLE. All hours of the month within each applicable binding season will be eligible for being tabulated for an occurring loss of load event.

Pure negative (or pure positive if the system is generation deficient) capacity with no outage rate will be added in all hours of the applicable binding season until the WRAP footprint or Subregion reaches the 1 day in 10-year reliability threshold. The pure negative (or positive) capacity assigned will be the same amount for all hours in the season of interest.

Monthly Implications - In accordance the WRAP tariff and business practices, the positive or negative capacity will be adjusted to ensure that all months of the applicable binding season have at least 0.01 day per year LOLE in that given month, while at the same time

ensuring the the LOLE for the entire binding season does not exceed 0.1 day per year per season LOLE.

4.7. PRM Calculation

The Program PRM will be determined on an Unforced Capacity (UCAP) basis. To calculate the PRM on a UCAP basis, the capacity value must be converted to a UCAP value.

Table 1. Resource capacity used for the UCAP PRM calculation.

Resource type	UCAP values used in PRM calculation
Thermal Generation	The Net Generating Capability will be replaced by QCC values calculated by Program Operator using the thermal QCC methodology (see BPM 105)
Wind and Solar	Values for wind resources, solar resources, and ESR will be determined by using an ELCC analysis (see BPM 105). The capacity values attributed to wind and solar resources and ESRs will be consistent with the QCC values assigned to such resources in the QCC analysis (see BPM 105).
Storage Hydro	QCC values submitted by the Participants calculated using the Storage Hydro QCC methodology (see BPM 105).
Run-of-River hydro	QCC values calculated by the Program Operator using the ROR QCC methodology (see BPM 105).
Demand Response	No conversion needed. Modeled maximum monthly capacity of all programs submitted by the Participants.
Pure Capacity adjustment to meet 1 day in 10-year LOLE	Value added to each month to achieve the desired metric. No conversion needed.

The UCAP PRM is calculated using the equation below.

$$\boldsymbol{PRM\ (UCAP)}\ (\%) = \frac{\boldsymbol{Capacity\ (@1-in-10) - P50\ Regional\ Demand}}{\boldsymbol{P50\ Regional\ Demand}} * \boldsymbol{100}$$

4.8. Simulation Process

The probabilistic LOLE study will model random forced outages for resources in the footprint during each hour of the study. Each simulation accounts for a different variation of forced outages, Variable Energy Resource (VER) output, and weather year for all hours of the year. The stop criterion for the modeling simulation is when the LOLE convergence factor is greater than or equal to 95% for consideration of probabilistic indices.

5. ELCC Analysis

5.1. ELCC Introduction

The determination of the Qualified Capacity Contribution (QCC) for specified VERs and ESR are determined through the completion of an Effective Load Carrying Capability (ELCC) study, which will analyze the ability of the VER or limited duration resources to reliably serve the footprint's demand. For this study, the resource types that will be analyzed are wind, solar, and ESRs in the WRAP footprint. The ELCC will be determined by running analysis with and without the resource being analyzed to determine its capacity value. Per WRAP BPM 105 Qualifying Resources, ESR does not include long-duration storage.

5.2. Area Modeling

For the ELCC study, the footprint will be divided into VER zones for wind and solar resources and by Subregion for ESRs. The VER zones for wind and solar will be contained within each Subregion. There will be a total of six (6) wind zones, three (3) solar zones, and two (2) sub-regions for ESRs.

The intent of the ELCC study is to determine the QCC (ELCC) for each VER zone or Subregion singularly.

No transmission constraints between the VER zones will be modeled in the ELCC study.

5.3. Load Modeling

The same hourly shapes and peak loads used in the LOLE Study will be used for the ELCC Study.

5.4. Generation Modeling (except wind, solar, and ESR resources)

Thermal generators, storage hydro resources, run-of-river hydro resources, long duration storage resources, and external capacity modeling will be modeled consistent with the LOLE study.

5.5. Wind, Solar, and Energy Storage Resources

For the evaluation of either wind, solar, or ESRs, the base study model will include all resources of the resource type that is not being analyzed (e.g. for the wind evaluation, solar and ESRs will be included in the base case). For resources currently installed or proposed to be in-service prior to the study year, hourly generation profiles will be

assigned to each resource. Hourly generation is based upon historical profiles correlated with the yearly load shapes as utilized in the LOLE Study.

5.6. ELCC Study Process

5.6.1. Weather Years Application

The ELCC Study will utilize the weather years from the LOLE Study and analyze all weather years together.

5.6.2. Seasonal Considerations

The summer season will be analyzed and is defined as June 1 to September 15.
The winter season will be analyzed and is defined as November 1 to March 15.

5.6.3. Determination of ELCC

To determine total ELCC, an LOLE value for the benchmark system will be calculated. The benchmark system is defined as load supplied by all conventional (coal, gas, etc.) and storage hydro generation in the footprint. The VER or ESR of interest will be excluded from the benchmark system. All other VER and ESR types will be included. For example, if the wind resource type is being analyzed, only wind will be excluded from the benchmark system.

If the resulting LOLE is greater than the 0.1 day per year per season threshold, "pure capacity" will be added until the 0.1 threshold is achieved. *"Pure capacity" refers to adding same amount of capacity for every hour of the year or season without an assigned forced outage rate.*

If LOLE is less than the 0.1 day per year per season threshold, "pure negative capacity" will be added until the 0.1 threshold is achieved.

The capacity calculated is designated in Figure 3-9 as "Pure Capacity 1."

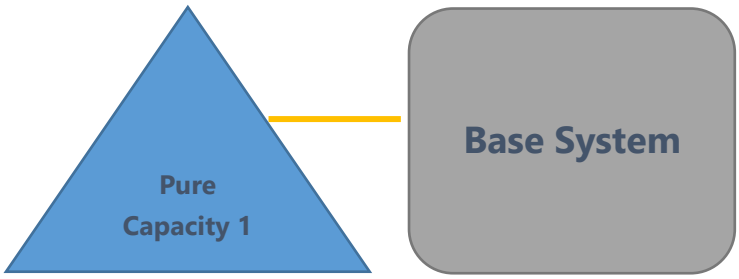

Figure 3-9. Diagram of system without renewable resources.

The pure capacity value calculated after adding back in the resource type being analyzed is designated in Figure 3-10 as "Pure Capacity 2."

Figure 3-10. Diagram of system with wind resources.

The difference between the results of these two scenarios is considered the ELCC accredited value of the resources being studied.

$$ELCC\ of\ VER\ or\ ESR\ (under\ study) = Pure\ capacity\ 1 - Pure\ capacity\ 2$$

5.7. Wind and Solar Zones

The ELCC study will determine the amount of capacity provided by all VERs (of the specified type, e.g., wind) analyzed in the Subregion.

ELCC studies will be performed for each VER zone (and VER type), calculating a total capacity value of the resource of interest in that zone. The capacity calculated for each zone will be allocated to VERs of that type in that zone on a pro-rata basis.

The proposed VER zones are shown in the figures below.

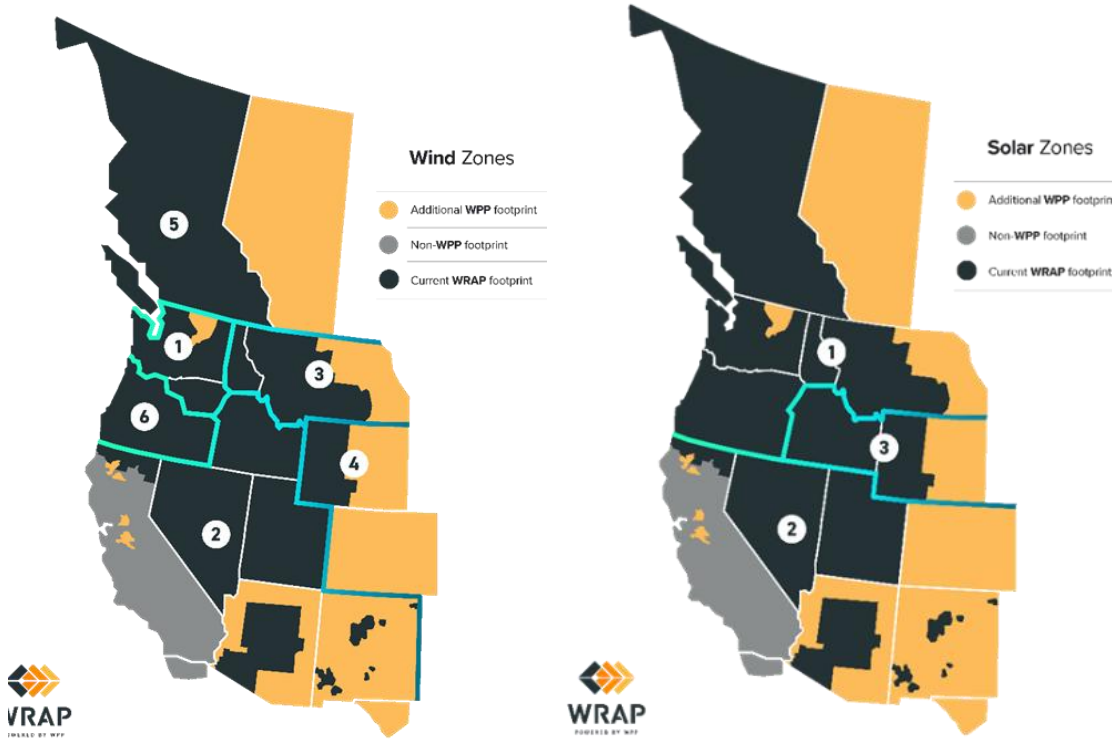

Figure 4. Wind and Solar Zones

To ensure correlation between the PRM and that over-accreditation of VERs does not occur, an ELCC study of all resource types will be performed and a total capacity value for all VERs (of each type) will be calculated. After all VER zone capacity totals (for each VER type) have been determined, the sum of the VER zone totals will be compared to the Subregion total. If the sum of the VER zones is greater than the Subregion total, all VER zone totals will be scaled down until the totals match the Subregiol total. Table 2 provides an example of the calculations to determine total VER (in this case: wind) capacity.

Table 2. ELCC Study of WRAP Program footprint to calculate total wind capacity.

A study of four wind zones reveals the following capacity values for wind in each zone:				
Zone 1	Zone 2	Zone 3	Zone 4	**Total**
1,000 MW	800 MW	700 MW	1,000 MW	**3,500 MW**
A study of the region reveals the following capacity value for the region's wind:				
Regional wind = 3,200 MW				
The zones will be recalculated as follows:				
Zone 1	Zone 2	Zone 3	Zone 4	**Total**
1,000 * (3,200/3,500)	800 * (3,200/3,500)	700 * (3,200/3,500)	1,000 * (3,200/3,500)	
914 MW	732 MW	640 MW	914 MW	**3,200 MW**

5.8. Seasonal and Monthly Impacts

Final QCC values for individual resources will be determined on a monthly basis for wind and solar resources and on a seasonal basis for ESR resources. In accordance with Business Practice Manual 105 (BPM 105), the monthly QCC value of wind and solar resources will be calculated by a proration of the seasonal ELCC values in accordance with each individual resource's performance during capacity critical hours (CCHs). The conversion from a zonal seasonal ELCC value to a resource specific monthly QCC value will be accomplished as follows. Monthly ELCC values for each zone will be calculated by shaping the seasonal ELCC value in accordance with aggregate performance of all resources in the zone during the CCH. Months that have higher resource performance during the CCH will be allocated a higher portion of the average ELCC across the season. After the total monthly ELCC is calculated for each zone, the allocation to each resource will be calculated based on the individual resource's performance during the CCH.

5.9. Simulation Process

The probabilistic ELCC study will model random forced outages for resources during each hour of the study. Each simulation accounts for a different variation of forced outages, and VER output for all hours of the season. The stop criterion for the modeling simulation is when the LOLE convergence factor is greater than or equal to 95% for consideration of probabilistic indices.

5.10. Determination of ELCC for future VER Resources

For each VER zone, after the QCC of all existing and near-term planned VERs have been calculated and allocated, ELCC studies will be performed to account for future VERs (of each type) in each VER zone. It is proposed to study incremental additions of wind, solar in each Subregion (MIDC and SWEDE) of 3,000 MW, 6,000 MW and 9,000 MW. These additional wind and solar resource amounts will be distributed by scaling up the number of wind turbines (nameplate capacity) or solar photovoltaic in each VER zone. The Program Operator will provide an ELCC curve that can be used to determine future capacity values for new resources dependent upon the penetration of resources in that VER zone. ESRs will continue to be modeled by Subregion to account for the significant difference in installed capacity between Subregions.

5.11. Treatment of other ELCC resource classes in each ELCC study

For consistency, the ELCC Studies will include all VERs not being analyzed in the base case when studying the resources of interest. In other words, the wind ELCC study will include all solar and energy storage resources in both situations with and without wind resources; the solar ELCC study will include all wind and ESR in both situations, with and

without the solar resources; and the ESR study will include all wind and solar resources in both situations with and without the energy storage resources

5.12. ELCC Study Scenarios

Scenario	Season	Fuel Type	Zone	Nameplate
1	Summer	Wind	1	2027 planned
2	Summer	Wind	2	2027 planned
3	Summer	Wind	3	2027 planned
4	Summer	Wind	4	2027 planned
5	Summer	Wind	5	2027 planned
6	Summer	Wind	6	2027 planned
7	Summer	Wind	1	2027 planned + 3,000MW (in the ratio for each zone of 2027 planned resources)
8	Summer	Wind	2	2027 planned + 3,000MW (in the ratio for each zone of 2027 planned resources)
9	Summer	Wind	3	2027 planned + 3,000MW (in the ratio for each zone of 2027 planned resources)
10	Summer	Wind	4	2027 planned + 3,000MW (in the ratio for each zone of 2027 planned resources)
11	Summer	Wind	5	2027 planned + 3,000MW (in the ratio for each zone of 2027 planned resources)
12	Summer	Wind	6	2027 planned + 3,000MW (in the ratio for each zone of 2027 planned resources)
13	Summer	Wind	1	2027 planned + 6,000MW (in the ratio for each zone of 2027 planned resources)
14	Summer	Wind	2	2027 planned + 6,000MW (in the ratio for each zone of 2027 planned resources)
15	Summer	Wind	3	2027 planned + 6,000MW (in the ratio for each zone of 2027 planned resources)
16	Summer	Wind	4	2027 planned + 6,000MW (in the ratio for each zone of 2027 planned resources)

17	Summer	Wind	5	2027 planned + 6,000MW (in the ratio for each zone of 2027 planned resources)
18	Summer	Wind	6	2027 planned + 6,000MW (in the ratio for each zone of 2027 planned resources)
19	Summer	Wind	1	2027 planned + 9,000MW (in the ratio for each zone of 2027 planned resources)
20	Summer	Wind	2	2027 planned + 9,000MW (in the ratio for each zone of 2027 planned resources)
21	Summer	Wind	3	2027 planned + 9,000MW (in the ratio for each zone of 2027 planned resources)
22	Summer	Wind	4	2027 planned + 9,000MW (in the ratio for each zone of 2027 planned resources)
23	Summer	Wind	5	2027 planned + 9,000MW (in the ratio for each zone of 2027 planned resources)
24	Summer	Wind	6	2027 planned + 9,000MW (in the ratio for each zone of 2027 planned resources)
25	Summer	Solar	1	2027 planned
26	Summer	Solar	2	2027 planned
27	Summer	Solar	3	2027 planned
28	Summer	Solar	1	2027 planned + 3,000MW
29	Summer	Solar	2	2027 planned + 3,000MW (in the ratio for each zone of 2027 planned resources)
30	Summer	Solar	3	2027 planned + 3,000MW (in the ratio for each zone of 2027 planned resources)
31	Summer	Solar	1	2027 planned + 6,000MW
32	Summer	Solar	2	2027 planned + 6,000MW (in the ratio for each zone of 2027 planned resources)
33	Summer	Solar	3	2027 planned + 6,000MW (in the ratio for each zone of 2027 planned resources)
34	Summer	Solar	1	2027 planned + 9,000MW

35	Summer	Solar	2	2027 planned + 9,000MW (in the ratio for each zone of 2027 planned resources)
36	Summer	Solar	3	2027 planned + 9,000MW (in the ratio for each zone of 2027 planned resources)
37	Summer	ESR	MIDC	2027 planned
38	Summer	ESR	SWEDE	2027 planned
39	Summer	ESR	MIDC	2027 planned + 3000MW
40	Summer	ESR	SWEDE	2027 planned + 3000MW
41	Summer	ESR	MIDC	2027 planned + 6000MW
42	Summer	ESR	SWEDE	2027 planned + 6000MW
43	Summer	ESR	MIDC	2027 planned + 9000MW
44	Summer	ESR	SWEDE	2027 planned + 9000MW
45	Winter	Wind	1	2027 planned
46	Winter	Wind	2	2027 planned
47	Winter	Wind	3	2027 planned
48	Winter	Wind	4	2027 planned
49	Winter	Wind	5	2027 planned
50	Winter	Wind	6	2027 planned
51	Winter	Wind	1	2027 planned + 3,000MW (in the ratio for each zone of 2027 planned resources)
52	Winter	Wind	2	2027 planned + 3,000MW (in the ratio for each zone of 2027 planned resources)
53	Winter	Wind	3	2027 planned + 3,000MW (in the ratio for each zone of 2027 planned resources)
54	Winter	Wind	4	2027 planned + 3,000MW (in the ratio for each zone of 2027 planned resources)
55	Winter	Wind	5	2027 planned + 3,000MW (in the ratio for each zone of 2027 planned resources)
56	Winter	Wind	6	2027 planned + 3,000MW (in the ratio for each zone of 2027 planned resources)
57	Winter	Wind	1	2027 planned + 6,000MW (in the ratio for each zone of 2027 planned resources)

58	Winter	Wind	2	2027 planned + 6,000MW (in the ratio for each zone of 2027 planned resources)
59	Winter	Wind	3	2027 planned + 6,000MW (in the ratio for each zone of 2027 planned resources)
60	Winter	Wind	4	2027 planned + 6,000MW (in the ratio for each zone of 2027 planned resources)
61	Winter	Wind	5	2027 planned + 6,000MW (in the ratio for each zone of 2027 planned resources)
62	Winter	Wind	6	2027 planned + 6,000MW (in the ratio for each zone of 2027 planned resources)
63	Winter	Wind	1	2027 planned + 9,000MW (in the ratio for each zone of 2027 planned resources)
64	Winter	Wind	2	2027 planned + 9,000MW (in the ratio for each zone of 2027 planned resources)
65	Winter	Wind	3	2027 planned + 9,000MW (in the ratio for each zone of 2027 planned resources)
66	Winter	Wind	4	2027 planned + 9,000MW (in the ratio for each zone of 2027 planned resources)
67	Winter	Wind	5	2027 planned + 9,000MW (in the ratio for each zone of 2027 planned resources)
68	Winter	Wind	6	2027 planned + 9,000MW (in the ratio for each zone of 2027 planned resources)
69	Winter	Solar	1	2027 planned
70	Winter	Solar	2	2027 planned
71	Winter	Solar	3	2027 planned
72	Winter	Solar	1	2027 planned + 3,000MW
73	Winter	Solar	2	2027 planned + 3,000MW (in the ratio for each zone of 2027 planned resources)
74	Winter	Solar	3	2027 planned + 3,000MW (in the ratio for each zone of 2027 planned resources)
75	Winter	Solar	1	2027 planned + 6,000MW

76	Winter	Solar	2	2027 planned + 6,000MW (in the ratio for each zone of 2027 planned resources)
77	Winter	Solar	3	2027 planned + 6,000MW (in the ratio for each zone of 2027 planned resources)
78	Winter	Solar	1	2027 planned + 9,000MW
79	Winter	Solar	2	2027 planned + 9,000MW (in the ratio for each zone of 2027 planned resources)
80	Winter	Solar	3	2027 planned + 9,000MW (in the ratio for each zone of 2027 planned resources)
81	Winter	ESR	MIDC	2027 planned
82	Winter	ESR	SWEDE	2027 planned
83	Winter	ESR	MIDC	2027 planned + 3000MW
84	Winter	ESR	SWEDE	2027 planned + 3000MW
85	Winter	ESR	MIDC	2027 planned + 6000MW
86	Winter	ESR	SWEDE	2027 planned + 6000MW
87	Winter	ESR	MIDC	2027 planned + 9000MW
88	Winter	ESR	SWEDE	2027 planned + 9000MW

6. General Deliverables

- The Program Operator shall develop and provide Advance Assessment (AA) draft and final results presentations and final results report for each season.
- The Program Operator shall present draft and final results to appropriate working groups and committees.
- The Program Operator shall provide Participants final QCC values of all registered resources along with final AA results.

Western Resource Adequacy Program

Non-Task Force Proposal

Non-Task Force Proposal	
Name: Clarifies deliverability of resources/contracts in BPM 108 Appendix A – FS Demonstration Attestation (2025-CRF-2)	Date of PRC Confirmation: 4/16/25
Lead Sponsor Information	
Name: Rebecca Sexton	Organization: Western Power Pool
Title: Director of Strategic Engagement & Communications	Phone Number: 253-279-3002
Email: Rebecca.Sexton@westernpowerpool.org	Date of Submission: 4/11/25

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)*

I. Needs and Benefits - *Provided by: Lead Sponsor*

a. Description of the Issue

The language in BPM 108 Appendix A - FS Demonstration Attestation can be interpreted to mean the signatory is attesting to meeting the applicable Season's Monthly FS Capacity Requirements and FS Transmission Requirements. The actual intent of the attestation was a declaration that the resources and contracts in the FS could be used to interchangeably serve any of the loads in the same FS (i.e. "deliverability").

b. Realized Benefits

The attestation is necessary for Participants to declare their due diligence in providing best available information, as well as verifying that the capacity and transmission provided on a single FS Submittal can be utilized to serve the load in that FS Submittal (as opposed to providing multiple FS Submittals for pockets of load and associated resources when resources are not available to all of the Participant's loads).

II. Solution - *Provided by: Lead Sponsor*

a. Proposed Solution

[Note: Edits in purple represents amendments by the RAPC]

Edit the language in BPM 108 Appendix A – FS Demonstration Attestation to clarify the intent of a declaration of deliverability rather than a testament to meeting the FS Capacity Requirements and FS Transmission Requirements.

Section 3.3.1 includes a sentence that points to the Attestation language and is proposed to be struck in accordance with the edits to the attestation.

b. Specific Document and Language

BPM 108 FS Submittal Process

[Note: Edits in purple represents amendments by the RAPC]

Section 3.1.1 (page 7)

Participant loads that cannot be served with a common set of Qualifying Resources and Qualifying Contracts shall therefore be submitted in separate FS Demonstrations. As part of the FS Submittal, Participants shall also be required to submit a Senior Official Attestation that the loads in a FS Demonstration can be served by the resources and contracts in the same FS Demonstration. Each FS Demonstration will have a unique FS Capacity Requirement and a unique FS Transmission Requirement, and each of those two requirements shall be met individually and separately from any other FS Demonstrations submitted by a Participant.

Appendix A – FS Demonstration Attestation

I, the undersigned, who, as [title], serves as a senior official of [Participant], hereby attest that I have reviewed [Participant]'s FS Submittal provided this day by [Participant] to Western Power Pool, and that the statements therein are true, correct and complete to the best of my knowledge and belief following due inquiry appropriate to the reliability and resource adequacy matters addressed therein. I further attest that, to the best of my knowledge and belief following due inquiry, the loads in the FS Demonstration made in such FS Submittal can be served by the Qualifying Resources and Net Contract QCC in such FS Demonstration.

c. Suggestion for Language Update

[Note: Edits in red represent language endorsed by the PRC on 6/4/2025 for RAPC consideration. Edits in purple represents subsequent amendments by the RAPC]

BPM 108 FS Submittal Process

Section 3.1.1 (page 7)

Participant loads that cannot be served with a common set of Qualifying Resources and Qualifying Contracts shall therefore be submitted in separate FS Demonstrations. ~~As part of the FS Submittal, Participants shall also be required to submit a Senior Official Attestation that the loads in a FS Demonstration can be served by the resources and contracts in the same FS Demonstration.~~ Each FS Demonstration will have a unique FS Capacity Requirement and a unique FS Transmission Requirement, and each of those two requirements shall be

met individually and separately from any other FS Demonstrations submitted by a Participant.

Appendix A – FS Demonstration Attestation

I, the undersigned, who, as [title], serves as a senior official of [Participant], hereby attest that I have reviewed [Participant]'s FS Submittal provided this day by [Participant] to Western Power Pool, and that to the best of my knowledge and belief following due inquiry appropriate to the reliability and resource adequacy matters addressed herein, and that the statements therein are true, correct and complete per all of the requirements of Business Practice Manual 108 ~~to the best of my knowledge and belief following due inquiry appropriate to the reliability and resource adequacy matters addressed therein. I further attest that, to the best of my knowledge and belief following due inquiry, the loads in the FS Demonstration made in such FS Submittal can be served by the Qualifying Resources and Net Contract QCC in such FS Demonstration the output of the Qualifying Resources and Qualifying Contracts relied upon in the FS Submittal can be used to serve and are deliverable to the loads in such FS Submittal.~~

III. Implementation Plan and Feasibility - *Provided by: Program Administrator/Program Operator*

a. Resource, Cost Assessment & Feasibility Review
b. Proposed Implementation Timeline

WESTERN POWERPOOL

Western Resource Adequacy Program

108 Forward Showing Submittal Process

100 – Forward Showing

Revision History

Manual Number	Version	Description	Revised By	Date
108	0.1	RAPC Glance Version	Michael O'Brien	12/5/2024
108	0.2	Public Comment	Michael O'Brien	12/11/2024
108	0.3	RAPC & PRC Review	Michael O'Brien	2/14/2024
108	0.4	RAPC Endorsement	Michael O'Brien	2/22/2024
108	0.5	Board Approval	Michael O'Brien	2/29/2024
108	1.0	Board Approved	Michael O'Brien	3/7/2024
108	1.1	2025-NTFP-1 Redlines	DRAFT	4/11/2025

Table of Contents

108 Forward Showing Submittal Process

1. Introduction

Forward Showing (FS) Submittal Process Business Practice Manual (BPM) 108 describes when and how each Participant provides its projected load and resource portfolio data to meet the Western Resource Adequacy Program (WRAP) FS Capacity Requirements and FS Transmission Requirements in the months of the Binding Seasons. The Western Power Pool's (WPP) FS Program is the forward-looking planning portion of the WRAP that aims to ensure the WRAP footprint has sufficient capacity to adequately serve projected peak load under a variety of possible scenarios. The FS Program includes the Advance Assessment (see *BPM 101 Advance Assessment*) that recommends FS Planning Reserve Margins (FSPRM) for Board approval and provides Qualifying Capacity Contribution (QCC) values for registered resources (see *BPM 105 Qualifying Resources*). The FSPRMs are applied to the P50 load forecasts of each Participant to set the FS Capacity Requirement for each month of a Binding Season. The FS Capacity Requirements shall be met by QCC from Qualified Resources and delivered consistent with the Tariff's FS Transmission Requirements, at a minimum.

1.1. Intended Audience

BPM 108 is intended for WRAP Participants and other interested individuals or entities. BPM 108 is particularly useful for those individuals responsible for the Participant Organization's FS Submittal, which includes the FS Demonstration of the FS Capacity Requirement and FS Transmission Requirement, along with FS supporting materials on Qualifying Resource Capability Testing, treatment of Thermal Resources without North American Electric Reliability Corporation (NERC) Generating Availability Data System (GADS) data, Hydro Resource QCC results, late registered resources, and Transition Period exceptions (Excused Transition Deficits and Joint Contract Accreditation Forms (JCAFs)).

1.2. What You Will Find in This Manual

This document describes: the FS Submittal and Cure Period; the required FS Submittal materials, including the FS Demonstration and FS supporting materials, along with associated Senior Official Attestations; Program Operator review of Participants' FS Submittals.

1.3. Purpose

BPM 108 is intended to assist Participants in completing their FS Submittals, including the FS Demonstration and the required supporting material, on or before the FS Deadline for the applicable Binding Season.

1.4. Definitions

All capitalized terms that are not otherwise defined in BPM 108 have the meaning set forth in the Tariff. Any capitalized terms not found in the Tariff that are specific to BPM 108 are defined here.

Catastrophic Failure Monthly Report: A demonstration by a Participant with an approved catastrophic resource failure exemption that either the circumstances necessitating the exception have not changed or that Qualifying Resources have become available, and the Participant has acquired them and no longer requires the exception.

Cure Deadline: The date 120 days after the FS Deadline after which any uncured deficiencies in a Participant's FS Submittal shall be assessed a FS Deficiency Charge.

Cure Period: The time period 120 days after the FS Deadline during which a Participant shall submit revisions to its FS Submittal to fully cure all identified deficiencies.

FS Demonstration: A demonstration that a Participant has met satisfactorily its FS Capacity Requirement and FS Transmission Requirement.

FS Instruction Manual: A set of instructions available on the WPP website.

Monthly Transmission Exception Check-In: A demonstration by a Participant with an approved Monthly Transmission Exception for Enduring Constraints or Future Firm ATC Expected that its inability to meet the FS Transmission Requirement has not changed.

2. Forward Showing Submittal and Cure Period

The Forward Showing Program has two Binding Seasons: The Summer Season and the Winter Season. The FS Submittal dates (FS Deadlines) for the Winter Season and Summer Season are shown in Table 1. All submission deadlines are at 5:00 pm Pacific Prevailing Time (PPT) on the date indicated. The Program Operator shall serve deficiency notices to a Participant that has not submitted any part of the FS Submittal by the FS Deadline (by 5:00 pm PPT on the date indicated in Table 1). Participants served a deficiency notice will have until 5:00 pm PPT on the dates show in Table 1 to cure their deficiencies by resubmitting their FS Submittal with the missing or correct data. Deficiencies uncured by the FS Cure Deadline will be subject to the FS Deficiency Charge (see *BPM 107 Forward Showing Deficiency Charge*).

Table 1. Forward Showing Submittal and Cure Period

	Winter Season	Summer Season
FS Deadline	March 31 of each Year	October 31 of each Year
Program Operator Deficiency notices	By May 30 of each Year	By December 30 of each Year
FS Cure Deadline	July 29 of each Year	February 28 of each Year

3. Forward Showing Submittal Materials

A Participant's FS Submittal shall include a FS Demonstration with the necessary information for each Binding Season to demonstrate the Participant has sufficient capacity and transmission service to satisfy the FS Capacity Requirement and FS Transmission Requirement. The FS Demonstration shall include the Participant's: load forecast for the upcoming Binding Season (see *BPM 103 Forward Showing Capacity Requirement*); demonstration of Qualifying Capacity Contribution (QCC) to meet its FS Capacity Requirement which can be from Qualifying Resources or contracts; demonstration of the FS Transmission Requirement needed for the reliable delivery of the QCC of the Participant's Qualifying Resources and Contracts to the Participant's load; applicable Monthly Transmission Exception requests and associated Senior Official Attestations; and a Senior Official Attestation for the FS Demonstration. In addition to the FS Demonstration, the FS Submittal shall include supporting FS materials including information on Qualifying Resource Capability Testing, Thermal Resources without GADS data, Hydro Resource QCCs and forced outages, late registered resources, and Transition Period exceptions.

3.1. FS Demonstration

As described in the FS Instruction Manual, a Participant must provide the Program Operator with the following information on loads, Qualifying Resources, contracts, and transmission to demonstrate it has satisfactorily met the FS Capacity Requirement and FS Transmission Requirement. A Participant's FS Demonstration shall be accompanied by the Senior Official Attestation found in Appendix A – FS Demonstration Attestation. The Program Operator determines whether a Participant has met its FS Capacity Requirement and FS Transmission Requirement using the method described in Appendix G – FS Summary.

3.1.1. Loads

Each Participant shall provide the following FS Demonstration load information as described in the FS Instruction Manual:

- Load name assigned for identification purposes and used for transmission mapping
- Balancing Authority (BA) in which the load is located
- The load point of delivery (POD) on the transmission system
- Forecasted monthly peak demand (see methodology in *BPM 103 Forward Showing Capacity Requirement*)

A Participant shall include all loads in its FS Demonstration for which it is responsible as well as documenting all loads it seeks to exclude (see *BPM 103 Forward Showing Capacity Requirement*): i.e. all loads within the western interconnection for which it is the LRE (or the exclusive wholesale electricity provider to the LRE) that are not covered by another resource adequacy program.

A Participant responsible for loads in two Subregions seeking to use the lower monthly FSPRM may submit a single FS Submittal if the Participant can demonstrate sufficient firm transmission service from the load in the Subregion with the lower monthly FSPRM to the load in the Subregion with the higher monthly FSPRM. The Participant will demonstrate NERC Priority 6 or NERC Priority 7 firm point-to-point (PTP) transmission service or network integration transmission service (NITS) in the quantity equal to the difference between the two FSPRMs multiplied by the amount of load in the Subregion with the higher FSPRM. For example, if Region A has a FSPRM of 20% in July and Region B has a FSPRM of 15% in July, and Participant has 1000MW of load in Region A, the Participant will demonstrate (20%-15%) *1000MW or 50MW of firm transmission from its load in Region B to its load in Region A. This transmission shall be distinct from any transmission demonstrated for delivering Qualifying Resources to participant load. See *BPM 103 Forward Showing Capacity Requirement* for information on calculating the FS Capacity Requirement in circumstances where loads from two Subregions are included in a single FS Submittal. In addition, a Participant responsible for loads in two Subregions seeking to use the higher monthly FSPRM may also submit a single FS Submission if the Participant can sign the FS Demonstration attestation in Appendix A.

All load submitted by a Participant within a single FS Demonstration must be able to be served interchangeably by all Qualifying Resources and Qualifying Contracts in that same FS Demonstration, without the expectation that additional transmission rights will be required to deliver resources to load. In accordance with this, a Participant may be required to submit separate FS demonstrations, even as to loads residing in the same Subregion, if the Program Administrator determines it is not practicable to treat such loads as if they can share in load and resource diversity for reasons that may diminish the integrity of WRAP reliability metrics, including but not limited to, if the Participant is responsible for (i) loads that are geographically distinct; (ii) loads that are separated by

constrained transmission paths; or (iii) loads and resources that are not operated collectively (see *BPM 103 FS Capacity Requirement*).

Participant loads that cannot be served with a common set of Qualifying Resources and Qualifying Contracts shall therefore be submitted in separate FS Demonstrations. ~~As part of the FS Submittal, Participants shall also be required to submit a Senior Official Attestation that the loads in a FS Demonstration can be served by the resources and contracts in the same FS Demonstration.~~ Each FS Demonstration will have a unique FS Capacity Requirement and a unique FS Transmission Requirement, and each of those two requirements shall be met individually and separately from any other FS Demonstrations submitted by a Participant.

3.1.2. Qualifying Resources

As part of the FS Demonstration, each Participant shall submit Qualifying Resources to satisfy the FS Capacity Requirement as described in the FS Instruction Manual. Qualifying Resources can be fully or partially owned by the Participant. The Participant shall use QCCs supplied by the Program Operator as part of the Advance Assessment (see *BPM 101 Advance* Assessment) unless the resource is being registered late (see *BPM 105 Qualifying Resources)*. The components of a hybrid resource should be described separately (for example, solar separately from a battery) and the overall limits of the facility considered when submitting the QCC for each component (see *BPM 101 Advance Assessment -Data Request Instruction Manual* for hybrid resource limitations). The Qualifying Resource information provided in the FS Demonstration should be consistent with the information provided by the Program Operator as a result of Resource Registration (see *BPM 105 Qualifying Resources*).

If a Participant experiences a catastrophic Qualifying Resource failure and is unable to replace the QCC on commercially reasonable terms prior to the FS Deadline, the Participant can seek an exception by submitting the attestation in Appendix B – Catastrophic Resource Failure Exception. For each month following the FS Deadline that a Participant sought a catastrophic resource failure exception, the Participant shall complete a Catastrophic Failure Monthly Report (available on the WPP website) demonstrating either:

- the circumstances necessitating the exception have not changed; or
- that Qualifying Resources (either the ones experiencing the catastrophic failure or other resources) have become available, and the Participant has acquired them and no longer requires the exception.

The Catastrophic Failure Monthly Report will be due on the last day of each Month and will cover any catastrophic Qualifying Resource exception requested for the upcoming (or ongoing) Binding Season, except the Month directly preceding the earliest Month that is the subject of catastrophic Qualifying Resource request. For example, if a Participant has requested a catastrophic Qualifying Resource exemption for July and August of 2035 at the FS Deadline (October 31, 2034), such Participant will submit a Catastrophic Failure Monthly Report for the July and August exception requests on or before the last days of November and December, 2034, and on or before the last days of January, February, March, April, and May, 2035, but need not submit such report for the July exception request on the last day of June 2035. The Participant will submit a Catastrophic Failure Monthly Report solely as to the August exception request on or before the last day of June 2035.

If at any time, the Participant there is a change in the circumstances that necessitated the exception such that the reasons for the exception no longer exist, or the Participant acquires other Qualifying Resources, the Participant will describe and demonstrate such acquisition in the next Catastrophic Failure Monthly Report, and upon acceptance of the demonstration, need not continue to provide a Catastrophic Failure Monthly Report for the exception no longer needed. Failure to submit a required Catastrophic Failure Monthly Report will result in an assessment of a Deficiency Charge, unless the deficiency is cured with seven days of notice of non-compliance.

The Program Operator and Program Administrator will seek to inform the Participant whether its exception request has been accepted within 14 Days of receiving the request. The impact of a successful exception request is explained in *BPM 107 Forward Showing Deficiency Charge*. If a Participant submits a request for exception that WPP denies in whole or in part, the Participant may appeal such denial to the Board of Directors. To make such appeal, the Participant should submit an appeal, in the form outlined on the WPP website, including all information the Participant considers necessary to support its view that WPP erred in denying the requested exception. Any such appeal must be submitted no later than 14 Days after WPP's denial of the exception request. The Board may request that the Participant provide such additional information as the Board considers necessary for its action on the appeal. The timing of the Board's action on an appeal is in the Board's discretion.

3.1.3. Contracts

Each Participant shall also provide notification and representation of contractual purchases and sales as described in *BPM 106 Qualifying Contracts* and in the FS Instruction Manual.

3.1.4. Transmission

Each Participant shall demonstrate the FS Transmission Requirement. As described in the FS Instruction Manual, a Participant shall demonstrate it has secured transmission rights sufficient to deliver a MW quantity equal to at least 75% of the MW quantity of its FS Capacity Requirement. The FS Transmission Requirement must be met with NERC priority 6 (NITS from resources not designated as network resources or conditional firm long-term firm PTP) or NERC priority 7 firm PTP transmission service or NITS from the Participant's Qualifying Resource(s) or from the delivery points for the Qualifying Resources identified for its Net Contract QCC (or for its RA Transfer) to the Participant's load. The FS Demonstration shall include information on a Participant's transmission service reservations that it plans to utilize in the upcoming Binding Season to meet its FS Transmission Requirement. The FS Demonstration shall also map Qualifying Resources (see Section 3.1.2) and contracts (see Section 3.1.3) to a Participant's loads (see Section 3.1.1) using the transmission service reservation information provided, as described in the FS Instruction Manual. A Participant that has Qualifying Resource in its balancing area, but is not a transmission service provider – and is therefore unable to provide transmission service reservation information – will attest that it has the transmission rights from the generation to the load on its system (see Appendix J – Transmission Rights Attestation).

3.1.4.1. Transmission Exceptions

If a Participant's FS Demonstration does not include the required transmission service reservations to satisfy the FS Transmission Requirement, the Participant may request Monthly Transmission Exceptions. As described in more detail below, there are four categories of Monthly Transmission Exception available to a Participant [terminology mirrors terms used in standard form Open Access Transmission Tariffs (OATTs) and on Open Access Same-time Information Systems (OASIS)]:

- Enduring Constraints;
- Future Firm Available Transmission Capability (ATC) Expected;
- Transmission Outages and Derates; and
- Counterflow of a Qualifying Resource.

All Participants requesting a Monthly Transmission Exception are responsible for submitting the completed Transmission Exception request form found on the WPP website, along with the Senior Official Attestation found in Appendix C – Monthly

Transmission Exception General Attestation – as part of their FS Submittal along with their FS Demonstration.

The Program Operator will review a Participant's Monthly Transmission Exceptions and notify the Participant of the status of its Monthly Transmission Exceptions for each month requested by 5:00 pm PPT on the 60th day after the FS Deadline.

If a Monthly Transmission Exception is denied (either because it is invalid or because circumstances changed and transmission has become available during the Program Operator's review of the Monthly Transmission Exception), the Participant will have the opportunity to cure its Transmission Deficiency on or before the last day of the Cure Period established for the relevant FS Submittal. The Participant may also appeal the rejection to the Board.

The Program Operator and Program Administrator will seek to inform the Participant whether its exception request has been accepted within 14 Days of receiving the request. If a Participant submits a request for exception that WPP denies in whole or in part, the Participant may appeal such denial to the Board of Directors. To make such appeal, the Participant should submit an appeal, in the form outlined on the WPP website, including all information the Participant considers necessary to support its view that WPP erred in denying the requested exception. Any such appeal must be submitted no later than 14 Days after WPP's denial of the exception request. The Board may request that the Participant provide such additional information as the Board considers necessary for its action on the appeal. The timing of the Board's action on an appeal is in the Board's discretion.

For each month following the FS Deadline that a Participant sought a Monthly Transmission Exception for Enduring Constraints or Future Firm ATC Expected, the Participant shall complete a Monthly Transmission Exceptions Check-in (available on the WPP website) demonstrating either:

- the circumstances necessitating the exception have not changed;
- transmission has become available and the Participant has acquired it; or
- the Participant has acquired a different Qualifying Resource with the necessary firm transmission and no longer requires the Monthly Transmission Exception.

The Monthly Transmission Exception Check-Ins will be due on the last day of each Month and will cover any Monthly Transmission Exceptions requested for the upcoming (or ongoing) Binding Season, except the Month directly preceding the earliest Month that is the subject of the Monthly Transmission Exception request. For example, if a Participant has requested a Monthly Transmission Exception for July and August of

2035 at the FS Deadline (October 31, 2034), such Participant will submit a Monthly Transmission Exception Check-In for the July and August exception requests on or before the last days of November and December, 2034, and on or before the last days of January, February, March, April, and May, 2035, but need not submit such check-in or the July exception request on the last day of June 2035. The Participant will submit a Monthly Transmission Exception Check-In solely as to the August exception request on or before the last day of June 2035.

If at any time, the Participant either acquires the necessary transmission or acquires a different resource and associated transmission, the Participant will describe and demonstrate such acquisition on the next Monthly Transmission Exception Check-In, and upon acceptance of the demonstration, need not continue to provide Monthly Transmission Exception Check-Ins for the exception no longer needed. Failure to submit a required Monthly Transmission Exception Check-In or rejection of the Monthly Transmission Exception Check-In in part or in whole (e.g. if contrary information is available to the Program Administrator, indicating transmission has become available for the month in question) will result in an assessment of a Deficiency Charge unless the deficiency is cured within seven days of notice of non-compliance.

3.1.4.1.1. Enduring Constraints

The Enduring Constraints Monthly Transmission Exception may be granted if the Participant is unable to demonstrate the necessary and sufficient firm transmission rights on any single segment of a source-to-sink path for a resource (exceptions will not be granted for two segments of a source-to-sink path) and the Participant demonstrates:

- there was no sufficiently firm ATC posted by a transmission service provider at the FS Deadline on the applicable segment for the months required; and
- there was remaining available ATC (non-firm ATC after the fact) for all CCHs in the same season of the most recent year for which CCHs have been calculated; or
- if the path was constrained in at least one CCH in the most recent same season from the most recently available CCH data set, that the Participant is:
    - constructing or contracting for a new local resource for at least the amount of Monthly Transmission Exception requested; or
    - pursuing long-term firm rights by entering the long-term queue and taking all appropriate steps for at least the amount of Monthly Transmission Exception requested.

If the required transmission rights for the applicable segment are only available for a duration of more than one year at the FS Deadline, a Participant is not required to

obtain that service to qualify for the Enduring Constraints exception. However, in that circumstance, the Participant shall not qualify for an Enduring Constraint exception for the same path (or across the same constraint) for the same month of the same season of the subsequent year if the Participant again declines the transmission rights that are available for a duration of more than one year.

In addition to the Monthly Transmission general exception discussed above in Section 3.1.4.1, a Participant requesting an Enduring Constraint Monthly Transmission Exception will need to include the Senior Official Attestation found in Appendix D – Enduring Constraint Additional Attestation as part of its FS Submittal.

3.1.4.1.2. Future Firm ATC Expected

The Future Firm ATC Expected exception may be granted when there is a reasonable expectation that sufficiently firm ATC will be made available following the FS Deadline and all the following criteria are met:

1. NERC priority 6 (NITS from resources not designated as network resources or conditional firm long-term firm PTP) or NERC priority 7 firm PTP transmission service or NITS is not posted or available prior to the FS Deadline; and
2. The Participant provides evidence that its transmission service provider has released additional NERC Priority NERC Priority 6 or 7 Firm PTP or NITS on the applicable path for all CCHs in the same season of the most recent year for which CCHs have been calculated following the FS Deadline; and
3. The Participant demonstrates that the amount of FS Transmission Requirement being requested for the Future Firm ATC Expected exception is equal to or less than the minimum volume of Priority NERC Priority 6 or 7 Firm PTP or NITS rights ATC released in the previous year's CCHs for the appropriate Binding Season.

If the required ATC on the applicable segment for the Month(s) needed is only posted or available prior to the FS Deadline for a duration of more than one year, a Participant is not required to obtain that service to qualify for the Future Firm ATC Expected exception. However, in that circumstance, the Participant shall not qualify for a Future Firm ATC Expected exception for the same path (or across the same constraint) for the same month of the same season of the subsequent year if the Participant again declines the ATC for transmission service rights that are available for a duration of more than one year.

The total amounts of Future Firm ATC Expected exceptions on specific paths is limited to the amount of transmission demonstrated to likely become available. If multiple Participants have requested a Future Firm ATC Expected exception on the same path,

the available volume will be granted on a pro-rata basis to requesting Participants based on the size of their requests.

3.1.4.1.3. Transmission Outages and Derates

The Transmission Outages and Derates exception may be granted when a Participant that has not met its FS Transmission Requirement demonstrates that all of the following criteria are met:

1. That an applicable segment of its existing transmission service rights from its source to sink path for its Qualifying Resource is expected to be derated or out-of-service and that additional ATC at NERC Priority 7 or 6 Firm PTP or NITS is not otherwise available; and
2. The duration of the Transmission Outages and Derates exception request coincides with the months of the outage or derate; and
3. The volume of the Transmission Outages and Derates exception being requested is either:
    a. equal to or less than the reduction in the Participant's existing transmission service rights on that path for the applicable derate or outage period; or
    b. equal to or less than the NERC Priority 7 or 6 Firm PTP or NITS for the applicable derate or outage period that would otherwise be posted and available for reservation were it not for the transmission limitation.

If multiple Participants have requested a Transmission Outages and Derates exception on the same path, the available volume (per Section 3.1.4.1.3 (3) above) will be granted on a pro-rata basis to requesting Participants based on the size of their requests.

3.1.4.1.4. Counterflow of a Qualifying Resource

A Counterflow of a Qualifying Resource exception may be granted if a Participant demonstrates that either:

1. The Participant's use of firm transmission service in connection with the delivery of capacity from Participant's Qualifying Resource (or from the resource associated with its Net Contract QCC) to Participant's load (or other qualifying delivery point permitted by the WRAP); or
2. A second Participant's use of firm transmission service in connection with the delivery of capacity from the second Participant's Qualifying Resource (or from the Qualifying Resource associated with its Net Contract QCC) to the second Participant's load (or other qualifying delivery point permitted by the WRAP)

provides a direct and proportional counterflow transmission that supports the first Participant's delivery of capacity from the first Participant's Qualifying Resource (or from the Qualifying Resource associated with its Net Contract QCC) to the first Participant's load or other qualifying delivery point permitted by the WRAP) Qualifying Resource to its load.

If the Counterflow of a Qualifying Resource exception is requested under subpart (2) of this Section, the Participant requesting the exception shall include a written acknowledgement from the second Participant that it is aware of such exception request. Counterflow of a Qualifying Resource must be directly between two BAAs. Counterflows that involve three or more BAAs will not qualify for the Counterflow of a Qualifying Resource exception.

3.1.5. Planned Outages

Per the requirements of Tariff Section 16.2.8, any planned outages during a Binding Season must be taken from a Participant's surplus (above its FS Capacity Requirement).

3.1.5.1. Planned Outages underway at the time of FS Submittal

Any Qualifying Resource that is out of service at the time of the FS Deadline and is planned to remain out of service for the first five or more days of a month in the Binding Season cannot have such Qualifying Resource's QCC counted toward meeting the Participant's FS Capacity Requirement for that month.

To ensure QCC from resources is not utilized to meet a monthly FS Capacity Requirement during the planned outage, the Capacity associated with such resources shall be deducted by identifying the planned outages in the FS Demonstration.

3.1.5.2. Planned Outages not underway at the time of the FS Submittal

Participants have the discretion to take planned outages at any time during the Binding Season, but are required to take planned outages out of their surplus FS Demonstration capacity or to procure additional supply to replace such capacity on outage Appendix E – Planned Outages Attestation.

Participants may provide information on Qualifying Resources that are planned to be out of service during the Binding Season as part of their FS Submittal, but if such data cannot be supplied with reasonable certainty (i.e. if such planned outages may be subject to change), a Participant may provide a Senior Official Attestation (found in Appendix E – Planned Outages Attestation) by the FS Deadline that the sum of expected planned outages at any one time during the Binding Season will be equal to or less than the surplus stated in its FS Demonstration at that time.

Participants are expected to procure the necessary capacity or energy to meet the Operations Program requirements regardless of planned outage schedules. A planned outage shall not justify a waiver of, or exception to, a Participant's Holdback Requirement or Energy Deployment obligations.

3.2. Forward Showing Supporting Materials

In addition to the FS Demonstration (see Section 3.1), accompanying Monthly Transmission Exception Requests (see Appendix C – Monthly Transmission Exception General Attestation) and required Senior Official Attestations, a Participant's FS Submittal shall also include supporting information on Qualifying Resource testing, Thermal Resources without GADS data, Hydro Resource QCCs, late registered resources, and transition exceptions.

3.2.1. Testing

As described in *BPM 105 Qualifying Resources,* Participants shall perform annual Operational Tests on all Qualifying Resources. In addition, Capability Tests shall be required for Thermal Resources, long duration storage resources, and Demand Response Capacity Resources. Each Participant's FS Submittal must include a completed resource testing report, employing for such purpose the resource testing form that is made available on the WPP website.

3.2.2. Thermal Resources that are not Required to Report GADS Data

BPM 101 Advance Assessment describes the data request sent out by the Program Operator to gather the information required to calculate QCC values for Qualifying Resources. The Advance Assessment data request includes NERC GADS or equivalent outage data that can be used to calculate the outage rates and factors for existing Thermal Resources. However, as discussed in *BPM 105 Qualifying Resources*, certain Thermal Resources are not required to report GADS data. For all Qualifying Resources not providing GADS reporting data, the Participant will be required to provide a Senior Official Attestation (provided in Appendix F – Non-GADS QCC Calculation Attestation) as part of its FS Submittal that attests the resource is not subject to GADS reporting and the FS Demonstration submitted by the Participant is an accurate depiction of either the historical performance or historical outage data of the resource.

3.2.3. Hydro Resources

As discussed in *BPM 105 Qualifying Resources*, QCCs for Storage Hydro resources are calculated by the Participant owners. The result of those calculations shall be submitted as part of a Participant's FS Submittal in the format described in *BPM 105 Qualifying Resources* and the FS Instruction Manual. The Storage Hydro Methodology utilizes an equivalent demand forced outage rate (EFORd) value as an input. Participants shall

supply as part of their FS Submittal a NERC GADS report showing the EFORd value. For all Storage Hydro resources that do not report NERC GADS data, the Participant shall similarly calculate an EFORd value from historical performance data and the non-GADS outage calculation tool as posted on the WPP website. The Participant will provide the output of this tool and a Senior Official Attestation (provided in Appendix F – Non-GADS QCC Calculation Attestation) attesting that the resource is not subject to GADS reporting and that the Participant has utilized the non-GADS outage calculation tool with complete and correct information. Participants will also provide a Senior Official Attestation (in the form provided in *Appendix I*) that their calculation of the Storage Hydro QCC value is correct, accurate, and in compliance with the requirements of the Tariff.

3.2.4. Late Registered Resources

As discussed in *BPM 105 Qualifying Resources*, resources that are unable to register by the deadline of the Advance Assessment data request (see *BPM 101 Advance Assessment*) may still be able to register prior to the FS Deadline so long as the necessary information is provided.

3.2.5. Transition Exceptions

BPM 109 Forward Showing Transition Period discusses how a new Participant application to the Program Administrator prior to March 31, 2027, shall be required to select an initial Binding Season during the Transition Period (Summer seasons for 2025, 2026, and 2027, and the Winter seasons for 2025-2026, 2026-2027, and 2027-2028). During its Transition Binding Seasons, a Participant may be able to request potential reductions in Deficiency Charges as described below.

3.2.5.1. Excused Transition Deficits

During a Participant's Transition Binding Seasons, Deficiency Charges otherwise applicable to the Participant under Section 17.1 of the Tariff, and calculated under Section 17.2, shall be reduced to the extent the Participant has an Excused Transition Deficit (ETD). To obtain an ETD for a Binding Season, the Participant must provide a Senior Official Attestation, as included in *BPM 109 Forward Showing Transition Period*.

3.2.5.2. Legacy Contract – No Joint Contract Accreditation Form (JCAF) Option

In addition to an ETD, during the Transition Period a Participant may be able to reduce its Monthly Capacity Deficiency to the extent the deficiency is due to the Participant's failure to obtain assent to a JCAF from the supplier under a Legacy Agreement (a power supply agreement entered into prior to October 1, 2021), as explained in *BPM 109 Forward Showing Transition Period* (the No-JCAF Option). To obtain that relief, the Participant must provide a Senior Official Attestation (in the form set forth in *BPM 109*

Forward Showing Transition Period) as part of its FS Submittal attesting that the Participant made commercially reasonable efforts to execute the required JCAF with the supplier under the Legacy Agreement, but the supplier was unable or unwilling to counter sign the JCAF.

4. Cure Period

The Program Operator shall review Participants' FS Submittals and serve deficiency notices in writing to any Participant that has not, by the FS Deadline shown in Table 2, submitted all required FS Submittal information and materials (see Section 3), or that has submitted information or materials that the Program Operator has found is or may be incorrect or deficient. Participants served a deficiency notice will have until the dates shown in Table 1 to cure their deficiencies. Deficiencies uncured by the time of the FS Cure Deadline shall be subject to the FS Deficiency Charge (*see BPM 107 Forward Showing Deficiency Charge*).

Appendix A – FS Demonstration Attestation

I, the undersigned, who, as [title], serves as a senior official of [Participant], hereby attest that I have reviewed [Participant]'s FS Submittal provided this day by [Participant] to Western Power Pool, **and that to the best of my knowledge and belief following due inquiry appropriate to the reliability and resource adequacy matters addressed herein**, and that the statements therein are true, correct and complete **per all of the requirements of Business Practice Manual 108.** ~~to the best of my knowledge and belief following due inquiry appropriate to the reliability and resource adequacy matters addressed therein. I further attest that, to the best of my knowledge and belief following due inquiry,~~ ~~the loads in the FS Demonstration made in such FS Submittal can be served by the Qualifying Resources and Net Contract QCC in such FS Demonstration~~ ~~the output of the Qualifying Resources and Qualifying Contracts relied upon in the FS Submittal can be used to serve and are deliverable to the loads in such FS Submittal.~~

Appendix B – Catastrophic Resource Failure Exception Attestation

I, the undersigned, who, as [title], serves as a senior official of [Participant], hereby attest that, as set forth in the accompanying request for an exception from the FS Capacity Requirement for the [specify season] Binding Season, (i) [Participant] has experienced a catastrophic failure of its [identify] Qualifying Resource[s] due to an event of Force Majeure as defined by Section 8.1 of the WRAP Tariff; (ii) [Participant] is unable to replace the QCC quantity of such Qualifying Resource[s] on commercially reasonable terms prior to the FS Deadline of [specify date] as a result of the timing and magnitude of such catastrophic failure and its consequences; and (iii) the statements in the accompanying FS Capacity Requirement exception request, including the information provided therein on the nature, causes and consequences of the catastrophic failure[s], and [Participant]'s specific, concrete efforts prior to the referenced FS Deadline to secure replacement Qualifying Resources for the [specify season] Binding Season, are true, correct and complete to the best of my knowledge and belief following due inquiry appropriate to the reliability and resource adequacy matters addressed therein.

Appendix C – Monthly Transmission Exception General Attestation

I, the undersigned, who, as [title], serves as a senior official of [Participant], hereby attest that, as set forth in the accompanying request for an exception from the FS Transmission Requirement for the [specify season] Binding Season, (i) [Participant] meets the stated WRAP requirements for the exception; and (ii) the statements in the accompanying FS Transmission Requirement exception request are true, correct and complete to the best of my knowledge and belief following due inquiry appropriate to the reliability and resource adequacy matters addressed therein.

Appendix D – Enduring Constraint Additional Attestation

I further attest, in support of [Participant]'s request for the Enduring Constraints Transmission Exception, that (i) no ATC for transmission service rights for which the exception is requested is available (either from the transmission service provider or through a secondary market) as of the FS Deadline, on the applicable segment for the Month(s) needed (for a duration of one year or less) at the applicable Open Access Transmission Tariff rate or less; (ii) [Participant] has taken commercially reasonable efforts to procure firm transmission service rights, and (iii) [Participant] has posted a request for the necessary firm transmission rights on the relevant bulletin board, (i.e., OASIS) prior to the FS Deadline.

Appendix E – Planned Outages Attestation

I, the undersigned, who, as [title], serves as a senior official of [Participant], hereby attest that: (i) as set forth in [Participant]'s FS Submittal provided this day by [Participant] to Western Power Pool, Participant has included information on all Qualifying Resources that are currently out of service with a scheduled return date that falls during the [specify season] Binding Season; (ii) Participant [has] [does not have] certain additional outages at Qualifying Resources that are planned to occur during the [specify season] Binding Season but have not yet begun at the time of submission of the FS Submittal; (iii) Participant has made reasonable efforts to obtain and provide information on any such additional outages, but such data cannot be supplied with reasonable specificity; (iv) the aggregate of any such additional outages shall be replaced with other resources meeting the applicable Qualifying Resource and Net Contract QCC criteria and all relevant WRAP timing and load-serving attributes of the resources on outage, or, to the extent not replaced, the aggregate quantity of such additional outages, is equal to or less than [Participant]'s remaining surplus as defined by [Participant]'s Portfolio QCC in excess of [Participant]'s FS Capacity Requirement; and (v) that the foregoing statements are true, correct and complete to the best of my knowledge and belief following due inquiry appropriate to the reliability and resource adequacy matters addressed herein.

Appendix F – Non-GADS QCC Calculation Attestation

I, the undersigned, who, as [title], serves as a senior official of [Participant], hereby attest that the resource that is the subject of this form is not subject to GADS data reporting; and that the resource's performance data (historical output or historical outage evaluation) for the Capacity Critical Hours of the [specify season] Binding Season is accurately accounted for in the accompanying FS Submittal.

Appendix G – FS Summary

A Participant's total Portfolio QCC is defined as the Participant's Resource QCC plus its Net Contract QCC plus its total RA transfer minus its planned outages for each month of the Binding Season.

$$Portfolio\ QCC = Resource\ QCC + Net\ Contract\ QCC + Total\ RA\ Transfer - Planned\ Outages$$

Where:

Resource QCC is the summation of all QCC values for the Participant's Qualified Resources calculated for each month of a Binding Season.

$$Resource\ QCC = \sum QCC\ of\ all\ Participant\ Qualifying\ Resources$$

The Net Contracted QCC is a monthly value equal to the sum of the Participant's Contract QCCs. Import contracts (purchases) are additive to the Participant's QCC value and exports (sales) are a negative QCC value. The Net Contract QCC formula is as follows:

$$Net\ Contract\ QCC = \sum QCC\ of\ all\ Participant\ Qualified\ Contracts$$

Resource adequacy transfers are added to the purchasing Participant's Portfolio QCC value and subtracted from the selling Participant's Portfolio QCC value. The contracts for these transfers will be provided to the Program Operator for validation.

$$Total\ RA\ Transfer = \sum Participant\ RA\ Transfer\ Contracts$$

The Participant's Total Portfolio QCC should be at least equal to the Participant's FS Capacity Requirement for each month of the Binding Season. If the Participant's Total Portfolio QCC meets or exceeds that threshold, then the Participant's FS Capacity Requirement has been satisfied.

$$Total\ Portfolio\ QCC \geq FS\ Capacity\ Requirement$$

Where:

The Participant's FS Capacity Requirement is its forecasted monthly demand multiplied by 100% plus the applicable Monthly FSPRM according to the following equation:

$$FS\ Capacity\ Requirement = Monthly\ P50 * (100\% + Monthly\ FSPRM)$$

The over and underperformance of VERs, forced outages, and Run-of-River hydro in the Participant's portfolio will be used to calculate performance changes in the Operations Program. The Participant's additional planned maintenance or short-term sales will be made from its excess Portfolio QCC.

The Participant's total demonstrated FS Transmission shall be at least equal to 75% of the Participant's FS Capacity Requirement at the FS Deadline. If the Participant's Total Portfolio QCC meets or exceeds that threshold, then the Participant's FS Transmission Requirement has been satisfied.

$$Demonstrated\ FS\ Transmission \geq FS\ Capacity\ Requirement * 75\%$$

Where:

Demonstrated FS Transmission is equal to the sum of all transmission demonstrated with completed paths and Approved Transmission Exceptions.

$$Demonstrated\ FS\ Transmission = \sum Trasnmission\ Demonstrated\ (completed\ paths) \mp Approved\ Transmission\ Exceptions$$

Appendix H – Demand Response Attestation

I, the undersigned, who, as [title], serves as a senior official of [Participant], hereby attest that for each Demand Response Qualifying Resource included in the accompanying FS Submittal, [Participant,] upon due investigation, has determined whether the demand response capability of such resource has been previously deployed to reduce load, and if such capability has been deployed to reduce load, Participant has, for purposes of developing the P50 Peak Load Forecast employed in such FS Submittal, added back to each historic hour when such capability was deployed the MWs of load reduction provided by such capability in such hour.

Appendix I – Storage Hydro Attestation

I, the undersigned, who, as [title], serves as a senior official of [Participant], hereby attest that I have reviewed [Participant]'s Storage Hydro Qualifying Capacity Contribution (QCC) provided this day by [Participant] to Western Power Pool (i.e., Program Administrator) ; and, to the best of my knowledge and belief following due inquiry appropriate to the reliability and resource adequacy matters addressed therein, that such QCC has been calculated in accordance with the methodology set forth in *BPM 105 Qualifying Resources* and such calculation meets all requirements of Tariff Section 16.2.5.5; that [Participant] has provided the Program Administrator with all information necessary to review such QCC that is stated in Tariff, Section 16.2.5.5, to the extent requested by the Program Administrator, and that all statements and information included in the FS Submittal with respect to the calculation of such QCC are true, correct and complete to the best of my knowledge and belief following due inquiry appropriate to the reliability and resource adequacy matters addressed therein.

Appendix J – Transmission Rights Attestation

I, the undersigned, who, as [title], serves as a senior official of [Participant], hereby attest that [Participant] has the transmission rights from [insert Qualifying Resources] Qualifying Resources to the load on [Participant's] system, but [Participant] is unable to provide transmission service reservation information.

Western Resource Adequacy Program

Non-Task Force Proposal

Non-Task Force Proposal	
Name: Clarifies requirements on planned outage reporting and attestation. (2025-CRF-3)	Date of PRC Confirmation:

Lead Sponsor Information	
Name: Maya McNichol	Organization: Western Power Pool
Title: WRAP Policy and Engagement Manager	Phone Number: 707-326-5523
Email: Maya.mcNicol@westernpowerpool.org	Date of Submission:

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)*

I. Needs and Benefits - *Provided by: Lead Sponsor*

a. Description of the Issue

The language in BPM 108 can be interpreted to mean a Participant can provide data in their FS Submittal regarding planned outages in lieu of submitting Appendix E – Planned Outages Attestation. Given that planned outages can change, the original intent was to require all Participants to submit BPM 108 Appendix E – Planned Outages Attestation stating the sum of expected planned outages at any one time during the Binding Season will be equal to or less than the surplus stated in its FS Demonstration at that time. In addition, there are proposed edits to Appendix E – Planned Outages Attestation that more closely aligns with the requirements of Tariff Section 16.2.8.

b. Realized Benefits

Submission of the BPM 108 Appendix E – Planned Outages Attestation is required to provide WPP with Participant acknowledgment that the taking of planned outages during a Binding Season is at the risk of that Participant. Participants are expected to backfill any capacity on planned outage during a Binding Season either by purchasing additional capacity or energy, or by having surplus capacity prior to taking the planned outage.

II. Solution - *Provided by: Lead Sponsor*

a. Proposed Solution

Edit the language in BPM 108 Section **3.1.5.2. Planned Outages not underway at the time of the FS Submittal [pages 14-15]** to clarify the intent of reporting planned outages in the FS Submittal and to clarify that submission of Appendix E – Planned Outage Attestation is required, not optional. In addition, edit language in Appendix E – Planned Outage Attestation to directly reference the requirements of Tariff Section 16.2.8.2.

b. Specific Document and Language

Changes in red from initial proposal for comment, changes in blue from BPA comments

BPM 108 FS Submittal Process

3.1.5.2. Planned Outages not underway at the time of the FS Submittal [pages 14-15]

Participants have the discretion to take planned outages at any time during the Binding Season~~,~~ but are required to take planned outages out of their surplus FS Demonstration capacity or to procure additional supply to replace such capacity on outage ~~Appendix E – Planned Outages Attestation~~. This requirement ensures the participant's FS Capacity Requirement is available during the Operation Program timeframe.

Participants may provide information on Qualifying Resources that are planned to be out of service during the Binding Season as part of their FS Submittal to ensure QCC from those resources is not utilized to meet a monthly FS Capacity Requirement during the planned outage. Capacity associated with such resources shall be deducted from the FS Demonstration for such month(s).

~~but if such data cannot be supplied with reasonable certainty (i.e. if such planned outages may be subject to change), a~~ Each Participant ~~may~~ shall provide a Senior Official Attestation (found in Appendix E – Planned Outages Attestation) by the FS Deadline that:

- the sum of expected planned outages at any one time during the Binding Season will be equal to or less than the surplus stated in its FS Demonstration at ~~that~~ the time of such planned outage, or
- the Participant ~~are~~ is expected to procure the necessary capacity or energy to meet the Operations Program requirements regardless of planned outage schedules.

A planned outage shall not justify a waiver of, or exception to, a Participant's Holdback Requirement or Energy Deployment obligations.

Appendix E – Planned Outages Attestation

I, the undersigned, who, as [title], serves as a senior official of [Participant], hereby attest that: (i) as set forth in [Participant]'s FS Submittal provided this day by [Participant] to Western Power Pool, Participant has included information on all Qualifying Resources that are currently out of service with a scheduled return date that falls during the [specify season] Binding Season; (ii) Participant [has] [does not have] certain additional outages at Qualifying Resources that are planned to occur during the [specify season] Binding Season but have not yet begun at the time of submission of the FS Submittal; (iii) Participant has made reasonable efforts to obtain and provide information on any such additional outages, but such data cannot be supplied with reasonable specificity; (iv) the aggregate of any such additional outages is either expected to be equal to or less than [Participant]'s remaining surplus as defined by [Participant]'s Portfolio QCC in excess of [Participant]'s FS Capacity requirement or to the extent it is not excess it ~~shall~~ will be replaced with the necessary capacity or energy to meet the Operations Program requirements, consistent with Section

16.2.8.2 and Part III of the Tariff ~~with other resources meeting the applicable Qualifying Resource and Net Contract QCC criteria and all relevant WRAP timing and load-serving attributes of the resources on outage, or, to the extent not replaced, the aggregate quantity of such additional outages, is equal to or less than [Participant]'s remaining surplus as defined by [Participant]'s Portfolio QCC in excess of [Participant]'s FS Capacity Requirement~~; and (v) that the foregoing statements are true, correct and complete to the best of my knowledge and belief following due inquiry appropriate to the reliability and resource adequacy matters addressed herein.

III. Implementation Plan and Feasibility - *Provided by: Program Administrator/Program Operator*

a. Resource, Cost Assessment & Feasibility Review

b. Proposed Implementation Timeline

Implementation would be an immediate republishing of BPM 108 and using that updated version for the Forward Showing immediately following Board approval of this proposal.

WESTERN POWERPOOL

Western Resource Adequacy Program

108 Forward Showing Submittal Process

100 – Forward Showing

Revision History

Manual Number	Version	Description	Revised By	Date
108	0.1	RAPC Glance Version	Michael O'Brien	12/5/2024
108	0.2	Public Comment	Michael O'Brien	12/11/2024
108	0.3	RAPC & PRC Review	Michael O'Brien	2/14/2024
108	0.4	RAPC Endorsement	Michael O'Brien	2/22/2024
108	0.5	Board Approval	Michael O'Brien	2/29/2024
108	1.0	Board Approved	Michael O'Brien	3/7/2024
108	1.1	2025-NTFP-2 Redlines	DRAFT	7/11/25

Table of Contents

108 Forward Showing Submittal Process

1. Introduction

Forward Showing (FS) Submittal Process Business Practice Manual (BPM) 108 describes when and how each Participant provides its projected load and resource portfolio data to meet the Western Resource Adequacy Program (WRAP) FS Capacity Requirements and FS Transmission Requirements in the months of the Binding Seasons. The Western Power Pool's (WPP) FS Program is the forward-looking planning portion of the WRAP that aims to ensure the WRAP footprint has sufficient capacity to adequately serve projected peak load under a variety of possible scenarios. The FS Program includes the Advance Assessment (see *BPM 101 Advance Assessment*) that recommends FS Planning Reserve Margins (FSPRM) for Board approval and provides Qualifying Capacity Contribution (QCC) values for registered resources (see *BPM 105 Qualifying Resources*). The FSPRMs are applied to the P50 load forecasts of each Participant to set the FS Capacity Requirement for each month of a Binding Season. The FS Capacity Requirements shall be met by QCC from Qualified Resources and delivered consistent with the Tariff's FS Transmission Requirements, at a minimum.

1.1. Intended Audience

BPM 108 is intended for WRAP Participants and other interested individuals or entities. BPM 108 is particularly useful for those individuals responsible for the Participant Organization's FS Submittal, which includes the FS Demonstration of the FS Capacity Requirement and FS Transmission Requirement, along with FS supporting materials on Qualifying Resource Capability Testing, treatment of Thermal Resources without North American Electric Reliability Corporation (NERC) Generating Availability Data System (GADS) data, Hydro Resource QCC results, late registered resources, and Transition Period exceptions (Excused Transition Deficits and Joint Contract Accreditation Forms (JCAFs)).

1.2. What You Will Find in This Manual

This document describes: the FS Submittal and Cure Period; the required FS Submittal materials, including the FS Demonstration and FS supporting materials, along with associated Senior Official Attestations; Program Operator review of Participants' FS Submittals.

1.3. Purpose

BPM 108 is intended to assist Participants in completing their FS Submittals, including the FS Demonstration and the required supporting material, on or before the FS Deadline for the applicable Binding Season.

1.4. Definitions

All capitalized terms that are not otherwise defined in BPM 108 have the meaning set forth in the Tariff. Any capitalized terms not found in the Tariff that are specific to BPM 108 are defined here.

Catastrophic Failure Monthly Report: A demonstration by a Participant with an approved catastrophic resource failure exemption that either the circumstances necessitating the exception have not changed or that Qualifying Resources have become available, and the Participant has acquired them and no longer requires the exception.

Cure Deadline: The date 120 days after the FS Deadline after which any uncured deficiencies in a Participant's FS Submittal shall be assessed a FS Deficiency Charge.

Cure Period: The time period 120 days after the FS Deadline during which a Participant shall submit revisions to its FS Submittal to fully cure all identified deficiencies.

FS Demonstration: A demonstration that a Participant has met satisfactorily its FS Capacity Requirement and FS Transmission Requirement.

FS Instruction Manual: A set of instructions available on the WPP website.

Monthly Transmission Exception Check-In: A demonstration by a Participant with an approved Monthly Transmission Exception for Enduring Constraints or Future Firm ATC Expected that its inability to meet the FS Transmission Requirement has not changed.

2. Forward Showing Submittal and Cure Period

The Forward Showing Program has two Binding Seasons: The Summer Season and the Winter Season. The FS Submittal dates (FS Deadlines) for the Winter Season and Summer Season are shown in Table 1. All submission deadlines are at 5:00 pm Pacific Prevailing Time (PPT) on the date indicated. The Program Operator shall serve deficiency notices to a Participant that has not submitted any part of the FS Submittal by the FS Deadline (by 5:00 pm PPT on the date indicated in Table 1). Participants served a deficiency notice will have until 5:00 pm PPT on the dates show in Table 1 to cure their deficiencies by resubmitting their FS Submittal with the missing or correct data. Deficiencies uncured by the FS Cure Deadline will be subject to the FS Deficiency Charge (see *BPM 107 Forward Showing Deficiency Charge*).

Table 1. Forward Showing Submittal and Cure Period

	Winter Season	Summer Season
FS Deadline	March 31 of each Year	October 31 of each Year
Program Operator Deficiency notices	By May 30 of each Year	By December 30 of each Year
FS Cure Deadline	July 29 of each Year	February 28 of each Year

3. Forward Showing Submittal Materials

A Participant's FS Submittal shall include a FS Demonstration with the necessary information for each Binding Season to demonstrate the Participant has sufficient capacity and transmission service to satisfy the FS Capacity Requirement and FS Transmission Requirement. The FS Demonstration shall include the Participant's: load forecast for the upcoming Binding Season (see *BPM 103 Forward Showing Capacity Requirement*); demonstration of Qualifying Capacity Contribution (QCC) to meet its FS Capacity Requirement which can be from Qualifying Resources or contracts; demonstration of the FS Transmission Requirement needed for the reliable delivery of the QCC of the Participant's Qualifying Resources and Contracts to the Participant's load; applicable Monthly Transmission Exception requests and associated Senior Official Attestations; and a Senior Official Attestation for the FS Demonstration. In addition to the FS Demonstration, the FS Submittal shall include supporting FS materials including information on Qualifying Resource Capability Testing, Thermal Resources without GADS data, Hydro Resource QCCs and forced outages, late registered resources, and Transition Period exceptions.

3.1. FS Demonstration

As described in the FS Instruction Manual, a Participant must provide the Program Operator with the following information on loads, Qualifying Resources, contracts, and transmission to demonstrate it has satisfactorily met the FS Capacity Requirement and FS Transmission Requirement. A Participant's FS Demonstration shall be accompanied by the Senior Official Attestation found in Appendix A – FS Demonstration Attestation. The Program Operator determines whether a Participant has met its FS Capacity Requirement and FS Transmission Requirement using the method described in Appendix G – FS Summary.

3.1.1. Loads

Each Participant shall provide the following FS Demonstration load information as described in the FS Instruction Manual:

- Load name assigned for identification purposes and used for transmission mapping
- Balancing Authority (BA) in which the load is located
- The load point of delivery (POD) on the transmission system
- Forecasted monthly peak demand (see methodology in *BPM 103 Forward Showing Capacity Requirement*)

A Participant shall include all loads in its FS Demonstration for which it is responsible as well as documenting all loads it seeks to exclude (see *BPM 103 Forward Showing Capacity Requirement*): i.e. all loads within the western interconnection for which it is the LRE (or the exclusive wholesale electricity provider to the LRE) that are not covered by another resource adequacy program.

A Participant responsible for loads in two Subregions seeking to use the lower monthly FSPRM may submit a single FS Submittal if the Participant can demonstrate sufficient firm transmission service from the load in the Subregion with the lower monthly FSPRM to the load in the Subregion with the higher monthly FSPRM. The Participant will demonstrate NERC Priority 6 or NERC Priority 7 firm point-to-point (PTP) transmission service or network integration transmission service (NITS) in the quantity equal to the difference between the two FSPRMs multiplied by the amount of load in the Subregion with the higher FSPRM. For example, if Region A has a FSPRM of 20% in July and Region B has a FSPRM of 15% in July, and Participant has 1000MW of load in Region A, the Participant will demonstrate (20%-15%) *1000MW or 50MW of firm transmission from its load in Region B to its load in Region A. This transmission shall be distinct from any transmission demonstrated for delivering Qualifying Resources to participant load. See *BPM 103 Forward Showing Capacity Requirement* for information on calculating the FS Capacity Requirement in circumstances where loads from two Subregions are included in a single FS Submittal. In addition, a Participant responsible for loads in two Subregions seeking to use the higher monthly FSPRM may also submit a single FS Submission if the Participant can sign the FS Demonstration attestation in Appendix A.

All load submitted by a Participant within a single FS Demonstration must be able to be served interchangeably by all Qualifying Resources and Qualifying Contracts in that same FS Demonstration, without the expectation that additional transmission rights will be required to deliver resources to load. In accordance with this, a Participant may be required to submit separate FS demonstrations, even as to loads residing in the same Subregion, if the Program Administrator determines it is not practicable to treat such loads as if they can share in load and resource diversity for reasons that may diminish the integrity of WRAP reliability metrics, including but not limited to, if the Participant is responsible for (i) loads that are geographically distinct; (ii) loads that are separated by

constrained transmission paths; or (iii) loads and resources that are not operated collectively (see *BPM 103 FS Capacity Requirement*).

Participant loads that cannot be served with a common set of Qualifying Resources and Qualifying Contracts shall therefore be submitted in separate FS Demonstrations. As part of the FS Submittal, Participants shall also be required to submit a Senior Official Attestation that the loads in a FS Demonstration can be served by the resources and contracts in the same FS Demonstration. Each FS Demonstration will have a unique FS Capacity Requirement and a unique FS Transmission Requirement, and each of those two requirements shall be met individually and separately from any other FS Demonstrations submitted by a Participant.

3.1.2. Qualifying Resources

As part of the FS Demonstration, each Participant shall submit Qualifying Resources to satisfy the FS Capacity Requirement as described in the FS Instruction Manual. Qualifying Resources can be fully or partially owned by the Participant. The Participant shall use QCCs supplied by the Program Operator as part of the Advance Assessment (see *BPM 101 Advance* Assessment) unless the resource is being registered late (see *BPM 105 Qualifying Resources)*. The components of a hybrid resource should be described separately (for example, solar separately from a battery) and the overall limits of the facility considered when submitting the QCC for each component (see *BPM 101 Advance Assessment -Data Request Instruction Manual* for hybrid resource limitations). The Qualifying Resource information provided in the FS Demonstration should be consistent with the information provided by the Program Operator as a result of Resource Registration (see *BPM 105 Qualifying Resources*).

If a Participant experiences a catastrophic Qualifying Resource failure and is unable to replace the QCC on commercially reasonable terms prior to the FS Deadline, the Participant can seek an exception by submitting the attestation in Appendix B – Catastrophic Resource Failure Exception. For each month following the FS Deadline that a Participant sought a catastrophic resource failure exception, the Participant shall complete a Catastrophic Failure Monthly Report (available on the WPP website) demonstrating either:

- the circumstances necessitating the exception have not changed; or
- that Qualifying Resources (either the ones experiencing the catastrophic failure or other resources) have become available, and the Participant has acquired them and no longer requires the exception.

The Catastrophic Failure Monthly Report will be due on the last day of each Month and will cover any catastrophic Qualifying Resource exception requested for the upcoming (or ongoing) Binding Season, except the Month directly preceding the earliest Month that is the subject of catastrophic Qualifying Resource request. For example, if a Participant has requested a catastrophic Qualifying Resource exemption for July and August of 2035 at the FS Deadline (October 31, 2034), such Participant will submit a Catastrophic Failure Monthly Report for the July and August exception requests on or before the last days of November and December, 2034, and on or before the last days of January, February, March, April, and May, 2035, but need not submit such report for the July exception request on the last day of June 2035. The Participant will submit a Catastrophic Failure Monthly Report solely as to the August exception request on or before the last day of June 2035.

If at any time, the Participant there is a change in the circumstances that necessitated the exception such that the reasons for the exception no longer exist, or the Participant acquires other Qualifying Resources, the Participant will describe and demonstrate such acquisition in the next Catastrophic Failure Monthly Report, and upon acceptance of the demonstration, need not continue to provide a Catastrophic Failure Monthly Report for the exception no longer needed. Failure to submit a required Catastrophic Failure Monthly Report will result in an assessment of a Deficiency Charge, unless the deficiency is cured with seven days of notice of non-compliance.

The Program Operator and Program Administrator will seek to inform the Participant whether its exception request has been accepted within 14 Days of receiving the request. The impact of a successful exception request is explained in *BPM 107 Forward Showing Deficiency Charge*. If a Participant submits a request for exception that WPP denies in whole or in part, the Participant may appeal such denial to the Board of Directors. To make such appeal, the Participant should submit an appeal, in the form outlined on the WPP website, including all information the Participant considers necessary to support its view that WPP erred in denying the requested exception. Any such appeal must be submitted no later than 14 Days after WPP's denial of the exception request. The Board may request that the Participant provide such additional information as the Board considers necessary for its action on the appeal. The timing of the Board's action on an appeal is in the Board's discretion.

3.1.3. Contracts

Each Participant shall also provide notification and representation of contractual purchases and sales as described in *BPM 106 Qualifying Contracts* and in the FS Instruction Manual.

3.1.4. Transmission

Each Participant shall demonstrate the FS Transmission Requirement. As described in the FS Instruction Manual, a Participant shall demonstrate it has secured transmission rights sufficient to deliver a MW quantity equal to at least 75% of the MW quantity of its FS Capacity Requirement. The FS Transmission Requirement must be met with NERC priority 6 (NITS from resources not designated as network resources or conditional firm long-term firm PTP) or NERC priority 7 firm PTP transmission service or NITS from the Participant's Qualifying Resource(s) or from the delivery points for the Qualifying Resources identified for its Net Contract QCC (or for its RA Transfer) to the Participant's load. The FS Demonstration shall include information on a Participant's transmission service reservations that it plans to utilize in the upcoming Binding Season to meet its FS Transmission Requirement. The FS Demonstration shall also map Qualifying Resources (see Section 3.1.2) and contracts (see Section 3.1.3) to a Participant's loads (see Section 3.1.1) using the transmission service reservation information provided, as described in the FS Instruction Manual. A Participant that has Qualifying Resource in its balancing area, but is not a transmission service provider – and is therefore unable to provide transmission service reservation information – will attest that it has the transmission rights from the generation to the load on its system (see Appendix J – Transmission Rights Attestation).

3.1.4.1. Transmission Exceptions

If a Participant's FS Demonstration does not include the required transmission service reservations to satisfy the FS Transmission Requirement, the Participant may request Monthly Transmission Exceptions. As described in more detail below, there are four categories of Monthly Transmission Exception available to a Participant [terminology mirrors terms used in standard form Open Access Transmission Tariffs (OATTs) and on Open Access Same-time Information Systems (OASIS)]:

- Enduring Constraints;
- Future Firm Available Transmission Capability (ATC) Expected;
- Transmission Outages and Derates; and
- Counterflow of a Qualifying Resource.

All Participants requesting a Monthly Transmission Exception are responsible for submitting the completed Transmission Exception request form found on the WPP website, along with the Senior Official Attestation found in Appendix C – Monthly

Transmission Exception General Attestation – as part of their FS Submittal along with their FS Demonstration.

The Program Operator will review a Participant's Monthly Transmission Exceptions and notify the Participant of the status of its Monthly Transmission Exceptions for each month requested by 5:00 pm PPT on the 60th day after the FS Deadline.

If a Monthly Transmission Exception is denied (either because it is invalid or because circumstances changed and transmission has become available during the Program Operator's review of the Monthly Transmission Exception), the Participant will have the opportunity to cure its Transmission Deficiency on or before the last day of the Cure Period established for the relevant FS Submittal. The Participant may also appeal the rejection to the Board.

The Program Operator and Program Administrator will seek to inform the Participant whether its exception request has been accepted within 14 Days of receiving the request. If a Participant submits a request for exception that WPP denies in whole or in part, the Participant may appeal such denial to the Board of Directors. To make such appeal, the Participant should submit an appeal, in the form outlined on the WPP website, including all information the Participant considers necessary to support its view that WPP erred in denying the requested exception. Any such appeal must be submitted no later than 14 Days after WPP's denial of the exception request. The Board may request that the Participant provide such additional information as the Board considers necessary for its action on the appeal. The timing of the Board's action on an appeal is in the Board's discretion.

For each month following the FS Deadline that a Participant sought a Monthly Transmission Exception for Enduring Constraints or Future Firm ATC Expected, the Participant shall complete a Monthly Transmission Exceptions Check-in (available on the WPP website) demonstrating either:

- the circumstances necessitating the exception have not changed;
- transmission has become available and the Participant has acquired it; or
- the Participant has acquired a different Qualifying Resource with the necessary firm transmission and no longer requires the Monthly Transmission Exception.

The Monthly Transmission Exception Check-Ins will be due on the last day of each Month and will cover any Monthly Transmission Exceptions requested for the upcoming (or ongoing) Binding Season, except the Month directly preceding the earliest Month that is the subject of the Monthly Transmission Exception request. For example, if a Participant has requested a Monthly Transmission Exception for July and August of

2035 at the FS Deadline (October 31, 2034), such Participant will submit a Monthly Transmission Exception Check-In for the July and August exception requests on or before the last days of November and December, 2034, and on or before the last days of January, February, March, April, and May, 2035, but need not submit such check-in or the July exception request on the last day of June 2035. The Participant will submit a Monthly Transmission Exception Check-In solely as to the August exception request on or before the last day of June 2035.

If at any time, the Participant either acquires the necessary transmission or acquires a different resource and associated transmission, the Participant will describe and demonstrate such acquisition on the next Monthly Transmission Exception Check-In, and upon acceptance of the demonstration, need not continue to provide Monthly Transmission Exception Check-Ins for the exception no longer needed. Failure to submit a required Monthly Transmission Exception Check-In or rejection of the Monthly Transmission Exception Check-In in part or in whole (e.g. if contrary information is available to the Program Administrator, indicating transmission has become available for the month in question) will result in an assessment of a Deficiency Charge unless the deficiency is cured within seven days of notice of non-compliance.

3.1.4.1.1. Enduring Constraints

The Enduring Constraints Monthly Transmission Exception may be granted if the Participant is unable to demonstrate the necessary and sufficient firm transmission rights on any single segment of a source-to-sink path for a resource (exceptions will not be granted for two segments of a source-to-sink path) and the Participant demonstrates:

- there was no sufficiently firm ATC posted by a transmission service provider at the FS Deadline on the applicable segment for the months required; and
- there was remaining available ATC (non-firm ATC after the fact) for all CCHs in the same season of the most recent year for which CCHs have been calculated; or
- if the path was constrained in at least one CCH in the most recent same season from the most recently available CCH data set, that the Participant is:
    - constructing or contracting for a new local resource for at least the amount of Monthly Transmission Exception requested; or
    - pursuing long-term firm rights by entering the long-term queue and taking all appropriate steps for at least the amount of Monthly Transmission Exception requested.

If the required transmission rights for the applicable segment are only available for a duration of more than one year at the FS Deadline, a Participant is not required to

obtain that service to qualify for the Enduring Constraints exception. However, in that circumstance, the Participant shall not qualify for an Enduring Constraint exception for the same path (or across the same constraint) for the same month of the same season of the subsequent year if the Participant again declines the transmission rights that are available for a duration of more than one year.

In addition to the Monthly Transmission general exception discussed above in Section 3.1.4.1, a Participant requesting an Enduring Constraint Monthly Transmission Exception will need to include the Senior Official Attestation found in Appendix D – Enduring Constraint Additional Attestation as part of its FS Submittal.

3.1.4.1.2. Future Firm ATC Expected

The Future Firm ATC Expected exception may be granted when there is a reasonable expectation that sufficiently firm ATC will be made available following the FS Deadline and all the following criteria are met:

1. NERC priority 6 (NITS from resources not designated as network resources or conditional firm long-term firm PTP) or NERC priority 7 firm PTP transmission service or NITS is not posted or available prior to the FS Deadline; and
2. The Participant provides evidence that its transmission service provider has released additional NERC Priority NERC Priority 6 or 7 Firm PTP or NITS on the applicable path for all CCHs in the same season of the most recent year for which CCHs have been calculated following the FS Deadline; and
3. The Participant demonstrates that the amount of FS Transmission Requirement being requested for the Future Firm ATC Expected exception is equal to or less than the minimum volume of Priority NERC Priority 6 or 7 Firm PTP or NITS rights ATC released in the previous year's CCHs for the appropriate Binding Season.

If the required ATC on the applicable segment for the Month(s) needed is only posted or available prior to the FS Deadline for a duration of more than one year, a Participant is not required to obtain that service to qualify for the Future Firm ATC Expected exception. However, in that circumstance, the Participant shall not qualify for a Future Firm ATC Expected exception for the same path (or across the same constraint) for the same month of the same season of the subsequent year if the Participant again declines the ATC for transmission service rights that are available for a duration of more than one year.

The total amounts of Future Firm ATC Expected exceptions on specific paths is limited to the amount of transmission demonstrated to likely become available. If multiple Participants have requested a Future Firm ATC Expected exception on the same path,

the available volume will be granted on a pro-rata basis to requesting Participants based on the size of their requests.

3.1.4.1.3. Transmission Outages and Derates

The Transmission Outages and Derates exception may be granted when a Participant that has not met its FS Transmission Requirement demonstrates that all of the following criteria are met:

1. That an applicable segment of its existing transmission service rights from its source to sink path for its Qualifying Resource is expected to be derated or out-of-service and that additional ATC at NERC Priority 7 or 6 Firm PTP or NITS is not otherwise available; and
2. The duration of the Transmission Outages and Derates exception request coincides with the months of the outage or derate; and
3. The volume of the Transmission Outages and Derates exception being requested is either:
    a. equal to or less than the reduction in the Participant's existing transmission service rights on that path for the applicable derate or outage period; or
    b. equal to or less than the NERC Priority 7 or 6 Firm PTP or NITS for the applicable derate or outage period that would otherwise be posted and available for reservation were it not for the transmission limitation.

If multiple Participants have requested a Transmission Outages and Derates exception on the same path, the available volume (per Section 3.1.4.1.3 (3) above) will be granted on a pro-rata basis to requesting Participants based on the size of their requests.

3.1.4.1.4. Counterflow of a Qualifying Resource

A Counterflow of a Qualifying Resource exception may be granted if a Participant demonstrates that either:

1. The Participant's use of firm transmission service in connection with the delivery of capacity from Participant's Qualifying Resource (or from the resource associated with its Net Contract QCC) to Participant's load (or other qualifying delivery point permitted by the WRAP); or
2. A second Participant's use of firm transmission service in connection with the delivery of capacity from the second Participant's Qualifying Resource (or from the Qualifying Resource associated with its Net Contract QCC) to the second Participant's load (or other qualifying delivery point permitted by the WRAP)

provides a direct and proportional counterflow transmission that supports the first Participant's delivery of capacity from the first Participant's Qualifying Resource (or from the Qualifying Resource associated with its Net Contract QCC) to the first Participant's load or other qualifying delivery point permitted by the WRAP) Qualifying Resource to its load.

If the Counterflow of a Qualifying Resource exception is requested under subpart (2) of this Section, the Participant requesting the exception shall include a written acknowledgement from the second Participant that it is aware of such exception request. Counterflow of a Qualifying Resource must be directly between two BAAs. Counterflows that involve three or more BAAs will not qualify for the Counterflow of a Qualifying Resource exception.

3.1.5. Planned Outages

Per the requirements of Tariff Section 16.2.8, any planned outages during a Binding Season must be taken from a Participant's surplus (above its FS Capacity Requirement).

3.1.5.1. Planned Outages underway at the time of FS Submittal

Any Qualifying Resource that is out of service at the time of the FS Deadline and is planned to remain out of service for the first five or more days of a month in the Binding Season cannot have such Qualifying Resource's QCC counted toward meeting the Participant's FS Capacity Requirement for that month.

To ensure QCC from resources is not utilized to meet a monthly FS Capacity Requirement during the planned outage, the Capacity associated with such resources shall be deducted by identifying the planned outages in the FS Demonstration.

3.1.5.2. Planned Outages not underway at the time of the FS Submittal

Participants have the discretion to take planned outages at any time during the Binding Season~~,~~ but are required to take planned outages out of their surplus FS Demonstration capacity or to procure additional supply to replace such capacity on outage ~~Appendix E – Planned Outages Attestation~~. This requirement ensures the participant's FS Capacity Requirement is available during the Operation Program timeframe.

Participants may provide information on Qualifying Resources that are planned to be out of service during the Binding Season as part of their FS Submittal to ensure QCC from those resources is not utilized to meet a monthly FS Capacity Requirement during the planned outage. Capacity associated with such resources shall be deducted from the FS Demonstration for such month(s).

~~but if such data cannot be supplied with reasonable certainty (i.e. if such planned outages may be subject to change), a~~ Each Participant ~~may~~ shall provide a Senior Official Attestation (found in Appendix E – Planned Outages Attestation) by the FS Deadline that:

- the sum of expected planned outages at any one time during the Binding Season will be equal to or less than the surplus stated in its FS Demonstration at ~~that~~ the time of such planned outage, or
- the Participant ~~are~~ is expected to procure the necessary capacity or energy to meet the Operations Program requirements regardless of planned outage schedules.

A planned outage shall not justify a waiver of, or exception to, a Participant's Holdback Requirement or Energy Deployment obligations.

3.2. Forward Showing Supporting Materials

In addition to the FS Demonstration (see Section 3.1), accompanying Monthly Transmission Exception Requests (see Appendix C – Monthly Transmission Exception General Attestation) and required Senior Official Attestations, a Participant's FS Submittal shall also include supporting information on Qualifying Resource testing, Thermal Resources without GADS data, Hydro Resource QCCs, late registered resources, and transition exceptions.

3.2.1. Testing

As described in *BPM 105 Qualifying Resources,* Participants shall perform annual Operational Tests on all Qualifying Resources. In addition, Capability Tests shall be required for Thermal Resources, long duration storage resources, and Demand Response Resources (as described and defined in *e*). Each Participant's FS Submittal must include a completed resource testing report, employing for such purpose the resource testing form that is made available on the WPP website.

3.2.2. Thermal Resources that are not Required to Report GADS Data

BPM 101 Advance Assessment describes the data request sent out by the Program Operator to gather the information required to calculate QCC values for Qualifying Resources. The Advance Assessment data request includes NERC GADS or equivalent outage data that can be used to calculate the outage rates and factors for existing Thermal Resources. However, as discussed in *BPM 105 Qualifying Resources*, certain Thermal Resources are not required to report GADS data. For all Qualifying Resources not providing GADS reporting data, the Participant will be required to provide a Senior Official Attestation (provided in Appendix F – Non-GADS QCC Calculation Attestation) as part of its FS Submittal that attests the resource is not subject to GADS reporting and the FS Demonstration submitted by the Participant is an accurate depiction of either the historical performance or historical outage data of the resource.

3.2.3. Hydro Resources

As discussed in *BPM 105 Qualifying Resources*, QCCs for Storage Hydro resources are calculated by the Participant owners. The result of those calculations shall be submitted as part of a Participant's FS Submittal in the format described in *BPM 105 Qualifying Resources* and the FS Instruction Manual. The Storage Hydro Methodology utilizes an equivalent demand forced outage rate (EFORd) value as an input. Participants shall supply as part of their FS Submittal a NERC GADS report showing the EFORd value. For all Storage Hydro resources that do not report NERC GADS data, the Participant shall similarly calculate an EFORd value from historical performance data and the non-GADS outage calculation tool as posted on the WPP website. The Participant will provide the output of this tool and a Senior Official Attestation (provided in Appendix F – Non-GADS QCC Calculation Attestation) attesting that the resource is not subject to GADS reporting and that the Participant has utilized the non-GADS outage calculation tool with complete and correct information. Participants will also provide a Senior Official Attestation (in the form provided in *Appendix 1*) that their calculation of the Storage Hydro QCC value is correct, accurate, and in compliance with the requirements of the Tariff.

3.2.4. Late Registered Resources

As discussed in *BPM 105 Qualifying Resources*, resources that are unable to register by the deadline of the Advance Assessment data request (see *BPM 101 Advance Assessment*) may still be able to register prior to the FS Deadline so long as the necessary information is provided.

3.2.5. Transition Exceptions

BPM 109 Forward Showing Transition Period discusses how a new Participant application to the Program Administrator prior to March 31, 2027, shall be required to select an initial Binding Season during the Transition Period (Summer seasons for 2025, 2026, and 2027, and the Winter seasons for 2025-2026, 2026-2027, and 2027-2028). During its Transition Binding Seasons, a Participant may be able to request potential reductions in Deficiency Charges as described below.

3.2.5.1. Excused Transition Deficits

During a Participant's Transition Binding Seasons, Deficiency Charges otherwise applicable to the Participant under Section 17.1 of the Tariff, and calculated under Section 17.2, shall be reduced to the extent the Participant has an Excused Transition Deficit (ETD). To obtain an ETD for a Binding Season, the Participant must provide a Senior Official Attestation, as included in *BPM 109 Forward Showing Transition Period*.

3.2.5.2. Legacy Contract – No Joint Contract Accreditation Form (JCAF) Option

In addition to an ETD, during the Transition Period a Participant may be able to reduce its Monthly Capacity Deficiency to the extent the deficiency is due to the Participant's failure to obtain assent to a JCAF from the supplier under a Legacy Agreement (a power supply agreement entered into prior to October 1, 2021), as explained in *BPM 109 Forward Showing Transition Period* (the No-JCAF Option). To obtain that relief, the Participant must provide a Senior Official Attestation (in the form set forth in *BPM 109 Forward Showing Transition Period*) as part of its FS Submittal attesting that the Participant made commercially reasonable efforts to execute the required JCAF with the supplier under the Legacy Agreement, but the supplier was unable or unwilling to counter sign the JCAF.

4. Cure Period

The Program Operator shall review Participants' FS Submittals and serve deficiency notices in writing to any Participant that has not, by the FS Deadline shown in Table 2, submitted all required FS Submittal information and materials (see Section 3), or that has submitted information or materials that the Program Operator has found is or may be incorrect or deficient. Participants served a deficiency notice will have until the dates shown in Table 1 to cure their deficiencies. Deficiencies uncured by the time of the FS Cure Deadline shall be subject to the FS Deficiency Charge (*see BPM 107 Forward Showing Deficiency Charge*).

Appendix A – FS Demonstration Attestation

I, the undersigned, who, as [title], serves as a senior official of [Participant], hereby attest that I have reviewed [Participant]'s FS Submittal provided this day by [Participant] to Western Power Pool, and that the statements therein are true, correct and complete to the best of my knowledge and belief following due inquiry appropriate to the reliability and resource adequacy matters addressed therein. I further attest that, to the best of my knowledge and belief following due inquiry, the loads in the FS Demonstration made in such FS Submittal can be served by the Qualifying Resources and Net Contract QCC in such FS Demonstration.

Appendix B – Catastrophic Resource Failure Exception Attestation

I, the undersigned, who, as [title], serves as a senior official of [Participant], hereby attest that, as set forth in the accompanying request for an exception from the FS Capacity Requirement for the [specify season] Binding Season, (i) [Participant] has experienced a catastrophic failure of its [identify] Qualifying Resource[s] due to an event of Force Majeure as defined by Section 8.1 of the WRAP Tariff; (ii) [Participant] is unable to replace the QCC quantity of such Qualifying Resource[s] on commercially reasonable terms prior to the FS Deadline of [specify date] as a result of the timing and magnitude of such catastrophic failure and its consequences; and (iii) the statements in the accompanying FS Capacity Requirement exception request, including the information provided therein on the nature, causes and consequences of the catastrophic failure[s], and [Participant]'s specific, concrete efforts prior to the referenced FS Deadline to secure replacement Qualifying Resources for the [specify season] Binding Season, are true, correct and complete to the best of my knowledge and belief following due inquiry appropriate to the reliability and resource adequacy matters addressed therein.

Appendix C – Monthly Transmission Exception General Attestation

I, the undersigned, who, as [title], serves as a senior official of [Participant], hereby attest that, as set forth in the accompanying request for an exception from the FS Transmission Requirement for the [specify season] Binding Season, (i) [Participant] meets the stated WRAP requirements for the exception; and (ii) the statements in the accompanying FS Transmission Requirement exception request are true, correct and complete to the best of my knowledge and belief following due inquiry appropriate to the reliability and resource adequacy matters addressed therein.

Appendix D – Enduring Constraint Additional Attestation

I further attest, in support of [Participant]'s request for the Enduring Constraints Transmission Exception, that (i) no ATC for transmission service rights for which the exception is requested is available (either from the transmission service provider or through a secondary market) as of the FS Deadline, on the applicable segment for the Month(s) needed (for a duration of one year or less) at the applicable Open Access Transmission Tariff rate or less; (ii) [Participant] has taken commercially reasonable efforts to procure firm transmission service rights, and (iii) [Participant] has posted a request for the necessary firm transmission rights on the relevant bulletin board, (i.e., OASIS) prior to the FS Deadline.

Appendix E – Planned Outages Attestation

I, the undersigned, who, as [title], serves as a senior official of [Participant], hereby attest that: (i) as set forth in [Participant]'s FS Submittal provided this day by [Participant] to Western Power Pool, Participant has included information on all Qualifying Resources that are currently out of service with a scheduled return date that falls during the [specify season] Binding Season; (ii) Participant [has] [does not have] certain additional outages at Qualifying Resources that are planned to occur during the [specify season] Binding Season but have not yet begun at the time of submission of the FS Submittal; (iii) Participant has made reasonable efforts to obtain and provide information on any such additional outages, but such data cannot be supplied with reasonable specificity; (iv) the aggregate of any such additional outages is either expected to be equal to or less than [Participant]'s remaining surplus as defined by [Participant]'s Portfolio QCC in excess of [Participant]'s FS Capacity requirement or to the extent it is not excess it ~~shall~~ will be replaced with the necessary capacity or energy to meet the Operations Program requirements, consistent with Section 16.2.8.2 and Part III of the Tariff ~~with other resources meeting the applicable Qualifying Resource and Net Contract QCC criteria and all relevant WRAP timing and load-serving attributes of the resources on outage, or, to the extent not replaced, the aggregate quantity of such additional outages, is equal to or less than [Participant]'s remaining surplus as defined by [Participant]'s Portfolio QCC in excess of [Participant]'s FS Capacity Requirement~~; and (v) that the foregoing statements are true, correct and complete to the best of my knowledge and belief following due inquiry appropriate to the reliability and resource adequacy matters addressed herein.

Appendix F – Non-GADS QCC Calculation Attestation

I, the undersigned, who, as [title], serves as a senior official of [Participant], hereby attest that the resource that is the subject of this form is not subject to GADS data reporting; and that the resource's performance data (historical output or historical outage evaluation) for the Capacity Critical Hours of the [specify season] Binding Season is accurately accounted for in the accompanying FS Submittal.

Appendix G – FS Summary

A Participant's total Portfolio QCC is defined as the Participant's Resource QCC plus its Net Contract QCC plus its total RA transfer minus its planned outages for each month of the Binding Season.

$$Portfolio\ QCC = Resource\ QCC + Net\ Contract\ QCC + Total\ RA\ Transfer - Planned\ Outages$$

Where:

Resource QCC is the summation of all QCC values for the Participant's Qualified Resources calculated for each month of a Binding Season.

$$Resource\ QCC = \sum QCC\ of\ all\ Participant\ Qualifying\ Resources$$

The Net Contracted QCC is a monthly value equal to the sum of the Participant's Contract QCCs. Import contracts (purchases) are additive to the Participant's QCC value and exports (sales) are a negative QCC value. The Net Contract QCC formula is as follows:

$$Net\ Contract\ QCC = \sum QCC\ of\ all\ Participant\ Qualified\ Contracts$$

Resource adequacy transfers are added to the purchasing Participant's Portfolio QCC value and subtracted from the selling Participant's Portfolio QCC value. The contracts for these transfers will be provided to the Program Operator for validation.

$$Total\ RA\ Transfer = \sum Participant\ RA\ Transfer\ Contracts$$

The Participant's Total Portfolio QCC should be at least equal to the Participant's FS Capacity Requirement for each month of the Binding Season. If the Participant's Total Portfolio QCC meets or exceeds that threshold, then the Participant's FS Capacity Requirement has been satisfied.

$$Total\ Portfolio\ QCC \geq FS\ Capacity\ Requirement$$

Where:

The Participant's FS Capacity Requirement is its forecasted monthly demand multiplied by 100% plus the applicable Monthly FSPRM according to the following equation:

$$FS\ Capacity\ Requirement = Monthly\ P50 * (100\% + Monthly\ FSPRM)$$

The over and underperformance of VERs, forced outages, and Run-of-River hydro in the Participant's portfolio will be used to calculate performance changes in the Operations Program. The Participant's additional planned maintenance or short-term sales will be made from its excess Portfolio QCC.

The Participant's total demonstrated FS Transmission shall be at least equal to 75% of the Participant's FS Capacity Requirement at the FS Deadline. If the Participant's Total Portfolio QCC meets or exceeds that threshold, then the Participant's FS Transmission Requirement has been satisfied.

$$Demonstrated\ FS\ Transmission \geq FS\ Capacity\ Requirement * 75\%$$

Where:

Demonstrated FS Transmission is equal to the sum of all transmission demonstrated with completed paths and Approved Transmission Exceptions.

$$Demonstrated\ FS\ Transmission = \sum Trasnmission\ Demonstrated\ (completed\ paths) \mp Approved\ Transmission\ Exceptions$$

Appendix H – Demand Response Attestation

I, the undersigned, who, as [title], serves as a senior official of [Participant], hereby attest that for each Demand Response Qualifying Resource included in the accompanying FS Submittal, [Participant,] upon due investigation, has determined whether the demand response capability of such resource has been previously deployed to reduce load, and if such capability has been deployed to reduce load, Participant has, for purposes of developing the P50 Peak Load Forecast employed in such FS Submittal, added back to each historic hour when such capability was deployed the MWs of load reduction provided by such capability in such hour.

Appendix I – Storage Hydro Attestation

I, the undersigned, who, as [title], serves as a senior official of [Participant], hereby attest that I have reviewed [Participant]'s Storage Hydro Qualifying Capacity Contribution (QCC) provided this day by [Participant] to Western Power Pool (i.e., Program Administrator) ; and, to the best of my knowledge and belief following due inquiry appropriate to the reliability and resource adequacy matters addressed therein, that such QCC has been calculated in accordance with the methodology set forth in *BPM 105 Qualifying Resources* and such calculation meets all requirements of Tariff Section 16.2.5.5; that [Participant] has provided the Program Administrator with all information necessary to review such QCC that is stated in Tariff, Section 16.2.5.5, to the extent requested by the Program Administrator, and that all statements and information included in the FS Submittal with respect to the calculation of such QCC are true, correct and complete to the best of my knowledge and belief following due inquiry appropriate to the reliability and resource adequacy matters addressed therein.

Appendix J – Transmission Rights Attestation

I, the undersigned, who, as [title], serves as a senior official of [Participant], hereby attest that [Participant] has the transmission rights from [insert Qualifying Resources] Qualifying Resources to the load on [Participant's] system, but [Participant] is unable to provide transmission service reservation information.