

October 29, 2025

Bill Drummond, Board Chair  
Sarah Edmonds, Chief Executive Officer  
Western Power Pool  
7525 NE Ambassador Pl. Ste. M  
Portland, OR, 97220

Subject: Idaho Power's Commitment to Binding Participation for Winter 2027-2028 in the Western Resource Adequacy Program and Request for Continued Collaboration and Program Refinement

Dear Sarah and Bill:

Idaho Power would like to begin by highlighting the dedication and hard work of Western Power Pool (WPP) staff and stakeholders across the West in developing the Western Resource Adequacy Program (WRAP). We appreciate your collaborative effort to address regional reliability and supply adequacy.

We are writing to affirm our commitment to WRAP and look forward to participating in the first scheduled binding season in Winter 2027–2028.

Over the past several years, WRAP participants have worked through complex challenges to bring this program to life. Idaho Power recognizes the collective efforts of such a diverse group of stakeholders. To ensure the program's long-term success and sustainability; however, we believe there are several key areas that warrant continued attention and improvement.

**Planning Reserve Margins (PRM).** The ongoing volatility and variability of PRMs remains a concern for Idaho Power. While we are encouraged by the direction of the PRM Task Force and the recent approval of the Concept Paper by the WRAP Participant Committee, additional steps are needed to ensure PRMs consistently meet reliability targets and strike an appropriate balance between certainty and flexibility.

**Day-Ahead Markets.** Idaho Power supports the Concept Paper developed by the Day-Ahead Market Task Force and is encouraged by the progress made thus far. It is essential that WRAP continues to evolve in a way that equitably accommodates participants across different market structures—or those not in a market at all—to ensure broad and sustained participation.

**Deficiency Charges.** Accountability is a cornerstone of WRAP's design. Deficiency charges should incentivize resource adequacy without placing undue burdens on participants who are actively working to resolve deficiencies. Idaho Power supports the recently approved Deficiency Charge Deferral Resolution and encourages continued refinement of the Deficiency Charge provisions to ensure fairness and effectiveness.

This provision is especially critical for entities like Idaho Power that are making substantial investments in new generation and transmission infrastructure over the next five years. Projects such as Boardman to Hemingway, the Southwest Intertie Project, and Gateway West are essential to Idaho Power's long-term reliability and the broader regional energy landscape. However, as is well understood, large-scale infrastructure projects are subject to complex permitting, construction, and regulatory timelines that can result in unforeseen delays. As such, it is imperative that WRAP maintain flexibility in its implementation of Deficiency Charges to account for these realities and support participants committed to long-term resource adequacy.

**Timing of the First Binding Season.** Idaho Power is prepared to participate in the Winter 2027–2028 binding season as currently scheduled. We believe it will be important to evaluate program and entity readiness between now and then, recognizing the tariff allows for a delay if deemed appropriate by the entities who at that time are binding. Allowing additional time for program maturation and participant readiness may be necessary to ensure the effectiveness of binding operations and the implementation of Deficiency Charges. We recognize a delay is not preferred before the binding deadline and will continue to evaluate this timeline in collaboration with all participants as we strive to attain the goals of WRAP.

Continued progress in these areas is vital to WRAP's future success and to Idaho Power's ability to remain an active participant in future binding periods. We are committed to contributing to these efforts and to working collaboratively with our partners across the region.

Once again, we thank WPP staff and all WRAP participants for their dedication and collaboration. Idaho Power looks forward to ongoing engagement to ensure WRAP delivers on its intention of reliability, customer protection, and resource adequacy for the West.

Sincerely,



Lisa Grow

Chief Executive Officer  
Idaho Power Company