

WESTERN RESOURCE ADEQUACY PROGRAM

September 8th, 2026

**Data Center & Large Load (DC-LL)
Task Force 14-19 Meeting 3**

AGENDA

1. Task Force Governance
2. Data Center Back-up Generation
3. Data Center Demand Response
4. Proposal Scoping Continued
5. Next Meeting: September 22nd, 2026

GOVERNANCE

TASK FORCE GOVERNANCE - LEADERSHIP

“The first act of this Task Force will be to elect Task Force leadership from its membership that shall include a Chair”

DATA CENTER BACK-UP GENERATION

DATA CENTER DEMAND RESPONSE

SCOPING CONTINUED

DC-LL - PROPOSAL SCOPING

- Original consolidated Concepts:
 - 2025-CRF-014 / Amazon / Large Load Exclusion
 - 2025-CRF-019 / PacifiCorp / Data Center Loads
- In addition, the Demand Response Task Force requests you discuss including two issues within the scope of your Task Force:
 - Behind-the-meter generation tied to load (e.g., if a data center has behind-the-meter generation sized greater than its current load, how should WRAP account for its ability to reduce demand as it builds out and its load increases); and
 - Inter-Participant Load Shifting (e.g., if a data center in WRAP Participant A's territory reduces its load to demonstrate its demand reduction capability but simultaneously increases its load at a data center in WRAP Participant B's territory to compensate for compute).

2025-CRF-014 / AMAZON / LARGE LOAD EXCLUSION

2025-CRF-019 / PAC / DATA CENTER LOADS

AWS/PAC

14/19

DATA CENTER /LARGE LOADS

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2025-CRF-014 / AMAZON / Large Load Exclusion

WRAP Area: FS Demonstration	Tarriff Change: Yes	Time Score: Long
Lead Sponsor: Paul Garrett pdg@amazon.com		Co-Sponsor:
Summary: Clarification of Load Exclusion for Independently Adequate Large Loads		
Description of the issue: (This comment submitted on behalf of Brandon Oyer, Director, AMER Energy & Water, Infra. Perf Services) Amazon Data Services, Inc. (ADS) appreciates the opportunity to submit this Change Request form for the Western Power Pool's (WPP) Western Resource Adequacy Program (WRAP). Most of ADS' load in Oregon is included in WRAP through Bonneville Power Administration as the transmission provider and Load Responsible Entity. ADS requests WPP to amend WRAP BPM 103 – "Participate Forward Showing Capacity Requirements" to clarify that loads with sufficient backup generation can elect to exclude their load from the Load Responsible Entity's load forecast.		

2025-CRF-019 / PAC / Data Center Loads

WRAP Area: FS Capacity Requirement	Tarriff Change: Yes	Time Score: Long
Lead Sponsor: Benjamin Faulkinberry benjamin.faulkinberry@@pacificorp.com		Co-Sponsor:
Summary: Program Consideration of Data Center Additions and Other Large Non-Conforming Loads		
Description of the issue: A substantial portion of projected utility load growth is driven by large, non-conforming, high-load-factor resources such as data centers. As these loads represent an increasing share of the WRAP footprint, existing modeling practices and policy frameworks may require adjustment. WRAP should explicitly incorporate this trend when establishing Forward Showing capacity obligations for Participants. Furthermore, WRAP must ensure that Participants introducing these loads earlier, or maintaining portfolios with higher concentrations of such resources, are not disproportionately burdened with capacity requirements necessary to achieve the regional 1-in-10 LOLE reliability standard.		

INTER-PARTICIPANT LOAD SHIFTING (DEMAND RESPONSE TASK FORCE)

Certain DR configurations may shift load across participants during Capacity Critical Hours rather than reducing net system load.

Example: Data Center 1 in Participant A reduces load while Data Center 2 in Participant B increases load.

This may overstate regional capacity and create inconsistencies in accounting.

Recommendations:

- Require demonstration of net load reduction at a regional or subregional level.
- Consider limiting or adjusting QCC for cross-participant load shifting programs.
- Require disclosure or attestation regarding such practices.

Behind-the-Meter Generation Tied to Load

(DEMAND RESPONSE TASK FORCE)

The Task Force should consider how to appropriately accredit demand response resource testing that is directly tied to a specific load, particularly where behind-the-meter generation is used to offset that load (e.g., a data center with co-located generation). In these cases, the demand response capability is effectively dependent on the size of the underlying load, which may be in the process of **being built out over time**.

During the initial testing period, the full load may not yet be realized, creating a situation where the resource cannot demonstrate its full potential load reduction capability under the existing testing framework. The full demand response may not be realized because the load may continue to be ramping online at the time of testing (i.e. continued ramping to and through the WRAP season.) A large load under development may only be partially energized at the time of testing, but the behind-the-meter generation is capable of fully offsetting the ultimate build-out load.

If the demand response resource is able to demonstrate that it can fully offset the existing load at the time of testing, it should be eligible to receive accreditation up to the full expected load at build-out for the applicable month/season.

This approach would better reflect the forward-looking reliability contribution of the resource while avoiding unnecessary under-accreditation due to timing mismatches between load growth and testing requirements. This approach is only enabled where load and DR resource ramp together - thus a shortage in DR also translates to a reduced amount of load and the load/resources are known with an ability to test a portion of the resource within the appropriate testing window.

The Task Force may consider allowing this through documented load forecasts, staged validation requirements, or conditional accreditation subject to future verification.

NEXT MEETING: SEPTEMBER 22ND, 2026