

# Western Resource Adequacy Program

## Non-Task Force Proposal

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Name: 2024-NTFP-005	Date of PRC Confirmation: 12/18/24

Lead Sponsor Information	
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Co-Sponsors Information (optional)	
Name:	Organization:
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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

### a. Description of the Issue:

BPM 209 references “generation facility” and “transmission facility” regarding Energy Deployment Waivers but these terms are not explicitly defined. This creates ambiguity when determining eligibility for waivers and evaluating compliance obligations. While the WRAP Tariff defines “Qualifying Resource,” the lack of an explicit definition for “generation facility” creates uncertainty as to whether it applies to only standalone plants or if it includes hybrid resources, co-located assets, or other resources submitted in a participant’s Forward Showing. Similarly, for transmission facilities, there is ambiguity when curtailments occur outside of a participant’s BA on transmission systems that are important for meeting compliance requirements of WRAP.

b. Realized Benefits:

Provides clarity and consistency in waiver evaluations, reducing the potential for misinterpretation. Will ensure that there is a reasonable path for unexpected curtailment of transmission outside of the Participant's BA that was part of the Participant's plan to meet obligations.

## II. Solution

a. Proposed Solution:

- Add clear definitions to BPM 209 for “generation facility” and “transmission facility.”

b. Specific Document and Language:

- BPM 209, Section 1.4 – Definition

c. Suggestion for Language Update:

- **Generation Facility** – any unit or resource, provided it meets the applicable WRAP requirements, that is relied upon to provide energy for meeting a participant’s compliance obligations under WRAP.
- **Transmission Facility** – any transmission asset or service, provided it meets the applicable WRAP requirements, that is relied upon to deliver energy for meeting a participant’s compliance obligations under WRAP.

## III. Implementation Plan and Feasibility

a. Resource, Cost Assessment & Feasibility Review: TBD

b. Proposed Implementation Timeline: TBD