197 FERC ¶ 61,098
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Laura V. Swett, Chairman;
David Rosner, Lindsay S. See,
Judy W. Chang, and David LaCerte.

Northwest Power Pool Docket No. ER26-3900-000

ORDER ACCEPTING TARIFF REVISIONS

(Issued November 6, 2026)

1. On September 30, 2026, pursuant to section 205 of the Federal Power Act (FPA)[1] and section 35.13 of the Commission's regulations,[2] Northwest Power Pool d/b/a Western Power Pool (WPP) submitted revisions to the Western Resource Adequacy Program (WRAP) Tariff to: (1) revise the forward showing schedules specific to the newly created Rockies subregion; (2) revise the Contingency Reserve methodology in light of the Commission's retirement of North American Electric Reliability Corporation (NERC) Regional Reliability Standard BAL-002-WECC-3 (BAL-002-WECC-3); (3) revise the Capacity Critical Hours (CCH) methodology to determine separate CCHs for each WRAP subregion; and (4) implement additional conforming changes to reflect that WRAP will now have at least three subregions.[3] As discussed below, we accept WPP's proposed revisions, effective October 1, 2026, as requested.

I. Background

2. WPP serves as the program administrator for WRAP, a Commission-approved regional resource adequacy framework covering the Western Interconnection. WRAP consists of two components across a Summer and Winter Season: a regional Forward Showing Program and an Operations Program. Relevant here, the Forward Showing Program calculates Forward Showing Planning Reserve Margins (FSPRM) for each WRAP subregion and requires participants to show they have sufficient capacity and transmission reservations to satisfy the required FSPRM; further, the program imposes

[1] 16 U.S.C. § 824d.

[2] 18 C.F.R. § 35.13 (2025).

[3] See Appendix for tariff records accepted in this order. Capitalized terms used but not otherwise defined in this order have the meanings defined in the WRAP Tariff.

deficiency penalties on participants who do not satisfy their requirements.[4] Under the WRAP Tariff, the Summer Season spans from June 1 to September 15, and the Winter Season spans from November 20 to February 28 (or February 29, as applicable) of each year.[5] WPP states that the WRAP Tariff establishes deadlines for WPP to recommend and for the WPP Board of Directors (WPP Board) to approve FSPRMs for each month for each subregion in advance of each WRAP season. Specifically, the WRAP Tariff specifies that WPP must post recommended FSPRMs for each subregion no later than 12 months before the forward showing deadline, obtain WPP Board approval of those values no later than nine months before that deadline, and that the forward showing deadline itself occurs seven months before the start of the binding season.[6]

3. Consistent with the timing requirements in section 14.3 of the WRAP Tariff, WPP states it conducted Loss of Load Expectation studies for existing subregions to establish FSPRMs for the Summer 2027 and Winter 2027-2028 Seasons. WPP explains it began Summer 2027 studies in June 2025, and the WPP Board adopted the resulting FSPRMs in December 2025. Similarly, WPP began Winter 2027-2028 studies in October 2025, and the WPP Board approved those FSPRMs in June 2026.[7]

4. WPP states that two new participants have executed WRAP Agreements, effective September 15, 2026.[8] WPP explains that these changes in participation, and the resulting changes in connectivity, necessitated the creation of the Rockies subregion.[9] WPP states that under the WRAP Tariff, the WPP Board is empowered to create new subregions based on an assessment of transmission connectivity; however, the WRAP Tariff limits

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[4] *Nw. Power Pool*, 182 FERC ¶ 61,063, at P 6 (2023). WRAP is currently in a non-binding, transition phase, with the first binding season to begin with the Winter 2027-2028 Season.

[5] Nw. Power Pool, WRAP Tariff, pt. I, § 1 (Definitions) (3.0.0). On August 19, 2026, WPP's revisions to the WRAP Tariff to shorten the duration of the WRAP Winter Season from November 1 to March 15, to November 20 to February 28 were accepted. *See Nw. Power Pool*, Docket No. ER26-2748, at 1 (Aug. 19, 2026) (delegated order).

[6] Nw. Power Pool, WRAP Tariff, pt. II, § 14 (Forward Showing Program Process and Timeline) (2.0.0), §§ 14.1-14.3.

[7] Transmittal at 6.

[8] *Id.* at 1.

[9] *Id.* at 4.

WRAP's ability to respond to significant changes in the WRAP footprint where participants are geographically dispersed or disconnected from existing subregions.[10]

5. On June 29, 2026, WPP filed a request for waiver of section 14.3 of the WRAP Tariff to permit WPP to set the FSPRMs for the new Rockies subregion.[11] On September 21, 2026, the Commission denied WPP's waiver request, finding that WPP failed to demonstrate that the waiver would not have undesirable consequences, and that WPP did not respond to commenters' arguments that Rockies subregion participants would have insufficient time to plan or procure resources after learning of their FSPRM requirements.[12] WPP states that the Commission invited WPP to submit an FPA section 205 filing to establish a process for setting the FSPRMs for the Rockies subregion and afford sufficient time for participants to comply.[13]

II. Filing

6. In the instant filing, WPP proposes a new section 14A of the WRAP Tariff, which modifies the forward showing schedules specific to the Rockies subregion for the binding Winter 2027-2028 Season and the non-binding Summer 2027 Season.[14] Under the existing forward showing schedule, the deadline for WPP Board approval of the FSPRMs is nine months in advance of the forward showing deadline, and the forward showing deadline is seven months in advance of the start of the season.[15] In addition, the existing schedule requires WPP to review participants' Forward Showing Submittals within 60 days after the forward showing deadline, and participants are provided with at least 60 days, i.e., 120 days after the forward showing deadline, to cure any deficiencies in their submittals.[16]

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[10] *Id.*

[11] *Nw. Power Pool*, 196 FERC ¶ 61,222 (2026) (Waiver Order).

[12] Transmittal at 7 (citing Waiver Order, 196 FERC ¶ 61,222 at P 28).

[13] *Id.* (citing Waiver Order, 196 FERC ¶ 61,222 at P 30).

[14] *Id.* at 8-10.

[15] *Id.* at 5-6.

[16] Nw. Power Pool, WRAP Tariff, pt. II, § 14 (Forward Showing Process and Timeline) (3.0.0), §§ 14.4, 14.5.

7. WPP states that it has made a good faith effort to address the timing considerations at issue in the Waiver Order.[17] WPP states that it engaged with Southwest Power Pool, Inc. (SPP), the Program Operator, to perform the modeling necessary for determining FSPRMs on a significantly faster timeline than anticipated in the waiver request.[18] WPP states that, on September 30, 2026, the same day that it filed the instant WRAP Tariff revisions, the WPP Board approved, on a conditional basis pending Commission acceptance of the instant filing, FSPRMs for the Rockies subregion for both the upcoming non-binding Summer 2027 Season and the binding Winter 2027-2028 Season.

8. Specifically, WPP proposes to move the forward showing deadline for the binding Winter 2027-2028 Season from April 19, 2027 to July 1, 2027, while maintaining the existing start date of November 20, 2027, for the Winter 2027-2028 Season.[19] Under the proposed Winter 2027-2028 schedule, WPP states that the deadline for WPP Board approval of the FSPRMs would remain nine months in advance of the forward showing deadline; however, the time between the forward showing deadline and the start of the season would be decreased from seven months to two months and 11 days. In addition, WPP explains that the review period would be reduced from within 60 days after the forward showing deadline to within 40 days after the forward showing deadline. WPP notes that the 60-day period for participants to cure any deficiencies would be unchanged, concluding 100 days after the forward showing deadline.[20] WPP asserts that the proposed schedule would give Rockies subregion participants comparable lead time to existing participants to make the necessary supply arrangements by the forward showing deadline.[21]

9. WPP states that it does not propose a new forward showing deadline for the non-binding Summer Season. Instead, under proposed section 14A.1 of the WRAP Tariff, the deadline for WPP Board approval of the Summer 2027 FSPRMs would be reduced to one month in advance of the unamended forward showing deadline of October 31, 2026. However, the time between the forward showing deadline and the start of the season, WPP's review period, and the participants cure period would go unchanged for the Summer 2027 Season.[22] WPP acknowledges that these revisions

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[17] Transmittal at 8.

[18] *Id.* at 9.

[19] *Id.*

[20] *Id.*

[21] *Id.* at 8.

[22] *Id.* at 10.

would create a compressed schedule from WPP Board approval of the FSPRMs to the forward showing deadline. However, WPP argues that this compressed schedule is unavoidable given the timing of the execution of the WRAP Agreements by the Rockies subregion participants and the Commission's denial of WPP's waiver request. WPP reiterates that this compressed schedule is specific to the Rockies subregion and would apply only to the non-binding Summer 2027 Season. Furthermore, WPP argues that Rockies subregion participants would still benefit by having an opportunity to participate in the non-binding season.[23]

10. In addition to revising FSPRM-related timelines, WPP proposes certain revisions to the WRAP Tariff to reflect the Commission's retirement of BAL-002-WECC-3 and to align WRAP's Contingency Reserve methodology with the WPP Reserve Sharing Group.[24] WPP explains that the impact of this change will be to reduce the amount of Contingency Reserves individual utilities will be required to carry, thereby reducing costs. Furthermore, WPP states that, at the request of its stakeholders, its proposed revisions ensure that its Contingency Reserve methodology remains aligned with WPP Reserve Sharing Group practices.[25]

11. Specifically, WPP proposes three changes to the WRAP Tariff Contingency Reserve methodology. First, WPP proposes to revise the definition of Contingency Reserve in the WRAP Tariff by removing language derived from recently retired Reliability Standard BAL-002-WECC-3 (Contingency Reserves).[26] Second, WPP proposes to revise the definition of Contingency Reserve Obligation in section 20.1.1 of the WRAP Tariff. Whereas the original definition referred to requirements attributable to Reliability Standard BAL-002-WECC-3, WPP proposes to define Contingency Reserve Obligation as "the [Load Responsible Entity's] share of the Balancing Authority's total Contingency Reserve obligation modified by any Contingency Reserve Adjustment, as set forth in the Business Practice Manuals." Third, WPP proposes new section 14.3.3 of the WRAP Tariff to enable WPP to adjust FSPRMs in the event that a new or modified NERC or WECC Reliability Standard requirement addressing Contingency Reserves becomes effective after FSPRMs have been approved by the WPP Board.[27] WPP states

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[23] *Id.*

[24] *Id.* at 10-11. WPP states that, while the WPP Reserve Sharing Group is separate from WRAP, all WRAP load is represented in the larger footprint of the WPP Reserve Sharing Group. *Id.* at 10.

[25] *Id.* at 11.

[26] *Id.*

[27] *Id.* at 12.

that, under the proposed revisions, it may only adjust an FSPRM if the change results in a decrease to one or more Monthly FSPRMs and the change is identified at least three months prior to the start of the binding season.

12. Next, WPP proposes revisions to the definition of CCH in the WRAP Tariff and certain revisions to calculate CCHs on a subregional, rather than regional, basis.[28] WPP explains that when the CCH methodology was originally developed, there was an expectation that the WRAP region would remain a relatively interconnected regional system. However, WPP states that with the addition of the Rockies subregion, the existing CCH methodology would fail to accurately reflect each subregion's capacity needs and availability.[29] Therefore, WPP proposes to determine separate CCH values for each WRAP subregion. WPP also proposes to broaden the scope of the data used to calculate CCHs beyond interchange values to permit consideration of other appropriate adjustments. WPP states that allowing a broader scope of data would enable the CCH methodology to account for relevant system conditions without relying solely on an interchange methodology developed for an earlier configuration of WRAP, and the proposal would permit more accurate FSPRMs to be applied to the Rockies subregion.[30]

13. Further, WPP proposes to revise section 21.2.6 of the WRAP Tariff to enable WPP to use either an Intercontinental Exchange, Inc. (ICE) Index Price or an average Locational Marginal Price (LMP) when determining the Day-Ahead Applicable Index Price.[31] WPP explains that under the Operations program, settlements are bilateral transactions with a price determined in part by a Day-Ahead Applicable Index Price (currently, the ICE Index Price); and, because there are no ICE Index Price hubs in the Rockies subregion, WPP proposes that the WRAP Tariff allow using either the applicable ICE Index Price or an average LMP.

14. Finally, WPP proposes minor ministerial revisions to sections 14.2.1.2 and 20.1.1 of the WRAP Tariff to reflect the fact that there are now more than two subregions.[32]

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[28] *Id.* at 14.

[29] *Id.* at 15.

[30] *Id.* WPP notes that the FSPRMs for the existing subregions for the upcoming binding seasons have already been calculated and will not use the subregional CCH methodology. *Id.* at 15 n.46.

[31] *Id.* at 17-18.

[32] *Id.*

15. WPP requests waiver of the Commission's 60-day prior notice requirement to allow an October 1, 2026 effective date for its proposed revisions.[33] WPP argues that good cause exists to grant waiver because it will permit the Rockies subregion to benefit from the certainty provided by having the FSPRMs as soon as possible.[34] Furthermore, WPP argues that granting waiver here would permit WPP to administer the Forward Showing Program on the timeline contemplated by, and consistent with, the WRAP Tariff and establish appropriate metrics for the Rockies subregion participants.

III. Notice and Responsive Pleadings

16. Notice of WPP's filing was published in the *Federal Register*, 91 Fed. Reg. 63539 (Oct. 6, 2026), with interventions and protests due on or before October 21, 2026. Timely motions to intervene and comments were filed by: Xcel Energy Services Inc., on behalf of its affiliate, Public Service Company of Colorado (PSCo) and Salt River Project Agricultural Improvement and Power District (SRP).

17. PSCo states that it supports the filing.[35] PSCo states that WPP's proposed transition provisions directly address the Commission's concern that Rockies subregion participants receive sufficient time to understand and satisfy their FSPRM obligations before the applicable forward showing deadlines.[36] In addition, PSCo states that the proposed Contingency Reserve revisions are reasonable and will improve the precision and accuracy of WRAP's resource adequacy construct while maintaining reliability.[37] Furthermore, PSCo states that calculating CCH by subregion will better align planning assumptions with the operating characteristics of the Rockies subregion footprint.[38]

18. SRP also supports the filing and requests that the Commission accept it without any material modifications.[39] SRP states that the revised Rockies subregion schedule responds to the Commission's concerns about lead time by moving the Rockies subregion participants' forward showing deadline while preserving the start date of the first binding

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[33] *Id.* at 19 (citing 18 C.F.R. § 35.3(a)(1) (2025)).

[34] *Id.* at 19-20.

[35] PSCo Comments at 1.

[36] *Id.* at 2.

[37] *Id.* at 3.

[38] *Id.* at 2.

[39] SRP Comments at 1.

season and the full 60-day cure period.[40] SRP further states that the proposed revisions to the Contingency Reserve requirements will align WRAP with current NERC reliability standards while reducing unnecessary reserve requirements in the applicable FSPRM.[41] In addition, SRP states that WPP's proposed subregional CCH methodology will improve the accuracy of planning metrics and better align resource accreditation with the reliability needs in the relevant subregion.[42]

IV. Discussion

A. Procedural Matters

19. Pursuant to Rule 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214 (2025), the timely, unopposed motions to intervene serve to make the entities that filed them parties to this proceeding.

B. Substantive Matters

20. We find that the proposed WRAP Tariff revisions are just and reasonable and not unduly discriminatory or preferential and, therefore, accept them, effective October 1, 2026, as requested.[43]

21. We find that the proposed revisions to the Forward Showing Program schedule for the binding Winter 2027-2028 Season will allow WRAP to implement a new Rockies subregion, and, in doing so, help achieve more targeted FSPRMs for current and future participants. Importantly, we find that WPP's proposal provides Rockies subregion participants comparable lead time between WPP Board approval of their FSPRMs and the forward showing deadline, and will preserve the 60-day period for curing identified deficiencies in the first binding season (Winter 2027-2028). Although WPP's proposal might result in a shorter time between the FSPRM Board approval and forward showing deadline for the Summer 2027 Season, we find this proposal to be reasonable given that

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[40] *Id.* at 4.

[41] *Id.* at 5.

[42] *Id.*

[43] We grant WPP's request for waiver of the Commission's 60-day prior notice requirement. 18 C.F.R. § 35.11 (2025) ("Upon application and for good cause shown, the Commission may, by order, provide that a rate schedule or tariff, tariff or service agreement, or part thereof, shall be effective . . . prior to the date the rate schedule or tariff, tariff or service agreement would become effective in accordance with these rules.").

the Summer 2027 Season is non-binding and will not impose deficiency penalties. Moreover, the revised schedules will apply only to subregions comprised entirely of participants that executed a WRAP Agreement effective September 15, 2026, or later, and other existing WRAP participants will therefore not be affected. Thus, we find that WPP's proposal strikes a reasonable balance to implement a Rockies subregion for the upcoming season.

22. We also accept WPP's proposal to base Total Settlement Price on either the Day-Ahead Applicable Index Price or on an average LMP. We find that this proposal is reasonable, given that not every subregion may have a relevant regional index price, and using an existing index from other regions may not result in the most representative settlement price. We also find that the ability to use an applicable average LMP is reasonable, especially given that certain participants would be part of SPP's Markets+, and would have applicable LMPs that would offer a basis on which to calculate settlement prices.

23. We also accept WPP's Contingency Reserve methodology revisions and find that the proposed changes remove references to a retired Reliability Standard, allow flexibility to account for any prospective changes to relevant Reliability Standards, and enable WRAP to remain consistent with the WRAP Reserve Sharing Group.

24. Additionally, we find that WPP's proposal to calculate CCHs on a subregional rather than regional basis will enable the methodology to accurately reflect each subregion's capacity needs and availability. Furthermore, we find it reasonable for WPP to broaden the scope of data used to calculate the CCH values beyond interchange values.

25. Finally, we accept WPP's ministerial revisions to reflect that the program will have more than two subregions.

The Commission orders:

WPP's proposed WRAP Tariff revisions are hereby accepted, effective October 1, 2026, as requested, as discussed in the body of this order.

By the Commission.

(S E A L)

Carlos D. Clay,
Deputy Secretary.

Appendix – Tariff Records

Northwest Power Pool
Tariff Database

- Section 1, Definitions (5.0.0)
- Section 14, Forward Showing Program Process and Timeline (4.0.0)
- Section 14A, Summer 2027 and Winter 2027-2028 Transition (0.0.0)
- Section 16, Components of the Forward Showing (3.0.0)
- Section 20, Components of the Operations Program (4.0.0)
- Section 21, Operations Program Settlements (2.0.0)

Document Content(s)

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