

Summary of Public Comments

Comments from 5 entities (all WRAP Participants):

- Idaho Power (Task Force member)
- Arizona Public Service Co. (Task Force member)
- Seattle City Light (not on Task Force)
- Tacoma Power (Task Force member)
- Salt River Project (not on Task Force)

Idaho Power

- Generally supportive of the proposal’s objectives, but concerned about setting binding FSPRMs five-plus years in advance due to uncertainty.
- Suggested alternatives to setting FSPRMs at five years. Not suggesting restudy after the binding FSPRMs have been set.
- Questioned whether the 10-year advisory study is needed.
- If the 10-year advisory study provides value and if the bandwidth used for it would be better used as additional effort for the binding FSPRMs.
- Encouraged future Load Forecasting and QCC/ELCC task forces to use this proposal as guardrails to prevent future work from undermining PRM improvements.

Arizona Public Service Co. (Task Force member)

- Supported many individual elements (shortening Winter, identification of peak vs. non-peak months) but cannot support the proposal as is due to reliability concerns tied to participation changes after binding FSPRMs are set.
- Requested Safeguards:
 - Clear triggers for reassessment
 - Better alignment between FSPRM approval timing and withdrawal notification rules
 - Transparent processes to manage material participation changes

Seattle City Light (not on Task Force)

- Supported improving planning certainty through earlier visibility into FSPRM values.
- Concerned about continued misalignment between modeled monthly PRMs and observed reliability risk, particularly in June.
- Overall, communicated strong concerns with June capacity requirement and how the proposed changes would affect that.

Tacoma Power (Task Force member)

- Supported the proposal as a compromise that should proceed expeditiously through governance process.
- Agreement with SCL on June capacity requirement and supported revisiting classification as Non-Peak Month (changing it to Peak Month).

- Recognized additional WRAP forums to continue discussions where appropriate

Salt River Project (not on Task Force).

- Concerned about misalignment of setting binding FSPRMs at 5-years with ELCC timing, load uncertainty, and participation changes.
 - Noted flexibility in WRAP governance process to make changes in the future.
 - Acknowledged proposed changes provide incremental improvement, but not full certainty for planning purposes.
- Concerned that prescriptively assigning higher allowable risk in the shoulder months will result in higher capacity requirements in the peak months of each season.
 - Supported shortening Winter, but not in combination with prescriptively shifting winter risk into fewer days (November).
 - Suggested retaining Program Operator discretion to allocate risk.

To address these comments, the Task Force discussed and made the following changes:

- Updated the modeling timelines to set advisory FSPRMs at 5 years ahead of the FS Deadline and adjust them after 3 years if significant changes to participation materialized to address the concerns that the studies were being performed too far ahead of the season and to capture some potential changes to participation.
- Classified June as a Peak Month to address the concerns about risk in June and the June capacity requirement.
- Removed the requirement to prescriptively assign risk to certain months to address the concerns about increasing the capacity requirement in Peak Months.
- Added language to the proposal to affirm WRAP governance pathways that exist to change policy.