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**WESTERN**  
POWERPOOL

# Western Resource Adequacy Program

302 Program Review Committee  
Proposal Development and  
Consideration

## Revision History

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## 302 Proposal Development and Consideration

### 1. Introduction

When a change to the Tariff or Business Practice Manuals (BPMs) is requested by a stakeholder (and does not qualify as an exigent circumstance within the meaning of Tariff section 4.1.3 (see BPM 303 *Expedited Review Process*) or other change specifically reserved to the RAPC under the Tariff, the established process and criteria for reviewing proposed amendments by the Program Review Committee (PRC) will be utilized. This process has two stages – Workplan Development and Approval (see *BPM 301*) and Proposal Development and Approval (*BPM 302*). BPM 302 describes how an individual Concept moves through the change control process, including how a Proposal is developed, commented upon, and approved for implementation. The Proposal Development section describes the creation of Task Forces by the PRC to address a proposed change to the Tariff or BPMs, and the Proposal Development process that occurs within that group. The

Proposal Review section of this BPM describes the process by which a Proposal is commented upon, revised, and approved. Non-Task Force Proposals, as determined by the PRC (see *BPM 301*) do not undergo Proposal Development and proceed directly to the Proposal review process.

#### 1.1. Intended Audience

BPM 302 is intended for the PRC, Program Administrator, Program Operator, and other interested individuals or entities. This BPM will be particularly useful to members of PRC Task Forces responsible for the development of a Proposal according to an established Workplan, as well as to WRAP stakeholders participating in the Proposal review and approval process.

#### 1.2. What You Will Find in This Manual

BPM 302 contains material relevant to the WRAP program change process, including the method by which Concepts are developed into Proposals, , revised by the PRC and assigned Task Forces, and subsequently considered for implementation into the Tariff or BPMs. This manual also describes review and approval of Non-Task Force Proposals.

#### 1.3. Purpose

BPM 302 provides an overview of the Proposal Development and approval process for changes to the Tariff or BPMs. The intent of all stakeholder engagement related BPMs (BPMs in the 300 series) is to ensure that changes to the Tariff and approved BPMs are undertaken transparently.





Nothing in this BPM changes in any way the ultimate authority of the independent Board over all aspects of WRAP, or the Board's exclusive authority under Section 2.1 and Section 3.1 of the Tariff, to approve WPP to file, and direct WPP to file, Tariff amendments under Federal Power Act section 205.

#### 1.4. Definitions

All capitalized terms that are not otherwise defined in this BPM have their meaning set forth in the Tariff. Any capitalized terms not found in the Tariff that are specific to this BPM are defined here.

**Concept:** As defined in *BPM 301 Program Review Committee Workplan Development and Approval*.

**Lead Sponsor:** As defined in *BPM 301 Program Review Committee Workplan Development and Approval*.

**Proposal:** As defined in *BPM 301 Program Review Committee Workplan Development and Approval*.

**Non-Task Force Proposal:** As defined in *BPM 301 Program Review Committee Workplan Development and Approval*.

**Task Force:** PRC sub-committee responsible for refining Concepts into full Proposals.

**Workplan:** As defined in *BPM 301 Program Review Committee Workplan Development and Approval*.

## 2. Background

The PRC is a multi-sector stakeholder committee charged with receiving, considering, and proposing design changes to the WRAP. The PRC will act as the clearing house for all recommended design changes not specifically identified as exigent by the RAPC (*see BPM 303 Expedited Review Process* for additional detail on such changes).

Recommended changes may come from Participants, the Committee of State Representatives (COSR), the Board or any of its members, other committees, stakeholders, or the public.

The PRC will be provided with facilitation support from the Program Administrator and program design/technical support from the Program Operator, as needed. If a stakeholder seeks to change the Tariff or a BPM, the stakeholder should submit a written explanation of the requested change, including any supporting information or



data, to the PRC via the Change Request Form located on the Western Power Pool's (WPP) website.

After a Workplan for addressing proposed changes is created and approved (see *BPM 301 PRC Workplan Development & Approval*), the PRC will identify Task Forces to refine requested changes into full Proposals, working with the Program Administrator and Program Operator. The draft Proposal, and any Non-Task Force Proposals, will be reviewed by the Program Administrator and Program Operator, the public, the COSR, and the RAPC before being considered by the Board.

### 3. Proposal Development

In accordance with the schedule and guidance provided in the Workplan, the PRC will identify Task Forces as appropriate to develop Workplan Concepts into Proposals. Once a Proposal is drafted, it will be reviewed and presented for comment and approval. Non-Task Force Proposals, as determined by the PRC, do not require further development and proceed directly to the Proposal review process (see section 4 of this BPM).

#### 3.1. Task Force Creation

The PRC's draft Workplan will identify the skillsets required on a Task Force for it to develop a Concept (or set of Concepts) into a Proposal. These skillsets may include, but are not limited to subject matter expertise on: transmission systems, power marketing, legal, regulatory, financial, or other resource-specific knowledge. A Task Force may be assigned to a single Concept or group of similar Concepts as identified in the Workplan, and will be populated with the identified skills and knowledge to develop a specific Concept (or set of Concepts) into a Proposal (or Proposals).

The Concept's Lead Sponsor (see *BPM 301 PRC Workplan Development & Approval*), will participate as a member of the Task Force. The remainder of the Task Force may include members of the PRC or any other individuals with specific subject matter expertise. The PRC will take nominations for Task Force participation, review the pool of interested individuals, and determine the roster for each Task Force according to the schedule from the Workplan.

In the process of selecting Task Force members, the PRC will endeavor to balance the need for diversity of perspective with creating groups appropriately sized to prioritize efficiency.



### *3.1.1. Task Force Decision Making*

Each Task Force will decide its own procedures pertaining to decision making processes (e.g., voting/consensus), leadership structure (e.g., chair/co-chair), and meeting frequency. All Task Forces will have non-Program Administrator/Program Operator leaders who will work with the Program Administrator and Program Operator to facilitate Task Force engagement and processes.

The Program Administrator will be tasked with supporting Task Force administrative functions and collaborating with the Task Force (with help from the Program Operator) to provide options, recommendations, and input on draft Proposals as requested.

### *3.2. Proposal Drafting Process*

For a given Concept (or Concepts), the associated Task Force develops a Proposal to address the requested changes. This Proposal shall include:

- A description of the need and the benefits resulting from the proposed change;
- Specific changes or updates to the Tariff or BPMs (e.g. redlines) that would be required to implement the Proposal;
- Alternative updates that were considered (if applicable)
- A resource and cost assessment and feasibility review by the Program Administrator and Program Operator; and
- A proposed implementation timeline.

The Task Force leadership (e.g., chair, co-chairs) will provide monthly status updates on the draft Proposal to the PRC. The monthly report will include a written summary of activities accomplished and decisions made by the Task Force since the last monthly report. PRC members may use these updates to provide feedback and input to Task Forces in advance of the review of completed Proposals. The PRC may determine it is necessary to work with the Program Administrator, Program Operator, and RAPC to consider implementation schedules of multiple Proposals to facilitate execution (e.g., deciding to implement multiple changes in conjunction, or timing implementation for shoulder seasons); such an approach may be implemented by the PRC in the review of and comments on Proposals.

### *3.2.1. Program Administrator/Program Operator Comment and Feasibility Review*

The Program Administrator and Program Operator will collaborate with the Task Force to provide a feasibility review that addresses the time, schedule, cost, and staffing requirements of the Proposal. This review will be provided when the Proposal is complete, prior to the Proposal review period. The Program Administrator and Program Operator may suggest alternatives and otherwise provide insight to the Task Forces



during the Proposal drafting process and to the PRC during the evaluation and decision-making process.

### *3.2.2. Development of Questions for Public Comment*

To facilitate stakeholder engagement, the Task Force will propose a set of questions for consideration during comment windows. At this stage, the Task Force will revisit the timelines proposed in the Workplan for comment collection and adjust as necessary.

### *3.2.3. Proposal Ready for Comment*

Once a Task Force has completed its development of a draft Proposal and questions for public comment, the PRC will verify its completeness and direct the Program Administrator to post it for public comment. This review by the PRC is not an endorsement of the proposed changes. If the PRC determines that the Proposal is not complete, the PRC will provide feedback to the Task Force as to the Proposal's deficiencies.

## 4. Proposal Review

Once a Proposal is ready for public comment, the Proposal is published on the WPP website. The Task Force can recommend that the Program Administrator host a webinar with the support of the PRC, Task Force, or Program Operator, as needed, to introduce the Proposal to the public. Non-Task Force Proposals (those the PRC has agreed do not necessitate development by a Task Force, see BPM 301 PRC Workplan Development for further detail) are directly published on the WPP website for public comment. For the purposes of Section 4 Proposal Review, the term "Proposal" includes Non-Task Force Proposals, and in that reading the term "Task Force" implies the Lead Sponsor of the Non-Task Force Proposal.

### 4.1. Public Comment

The Task Force will recommend to the PRC a duration of no less than two weeks for the open public comment window, depending on the length, complexity, and anticipated impact of the Proposal. The PRC will set a deadline for public comment on a given Proposal. Note that Participants, COSR members, Board members, or anyone else may comment on the draft Proposal during this time. Comments will be submitted to the WPP website.

After the public comment period ends, the Task Force will review all comments submitted and update the Proposal at its discretion. Comments will be made available publicly as they are submitted and will remain available after the comment period closes





(through consideration by the Board of Directors). The Task Force will inform the PRC of any changes, either in writing or via a meeting if schedules allow.

#### 4.2. COSR Comments

After the public comment period ends, the updated Proposal will be published on the WPP website for COSR review along with a summary of the public comments received and any changes made to address them.

The Task Force will provide a recommendation to the PRC for the length of the COSR comment period on the Proposal. The PRC will determine a deadline for COSR comments. Comments are submitted by the COSR to the WPP website and will be available publicly upon submission.

After the COSR comment period, the Task Force will review all comments submitted and will update the Proposal at its discretion.

#### 4.3. PRC Endorsement Process

Once the public and COSR reviews of a Proposal are complete and comments have been reviewed by the Task Force and incorporated at its discretion, the PRC will consider whether to endorse the Proposal to the RAPC.

##### 4.3.1. Public Meeting and Decision

The PRC will host a public meeting to review comments received, identify any updates made in response to those comments, and decide whether to endorse the Proposal to the RAPC.

##### 4.3.1.1. PRC Sector Voting

The PRC will endeavor to operate by consensus. If PRC consensus on a Proposal endorsement cannot be achieved, voting will be undertaken in the method described in the PRC charter (posted on the WPP website). The Proposal will progress to the RAPC regardless of the outcome of the PRC process, but attaining an affirmative PRC recommendation will lower the required RAPC voting threshold per the Tariff.

#### 4.4. RAPC Review

The Proposal will progress to the RAPC regardless of the outcome of the PRC process, but attaining an affirmative PRC recommendation will lower the required RAPC voting threshold per the Tariff. The RAPC will vote whether to recommend approval of the Proposal to the Board.



For a Proposal to be affirmatively recommended by the RAPC, it must pass both House and Senate vote tallies as described in the Tariff. A Proposal affirmatively recommended by the PRC requires a 67% affirmative vote in both the House and Senate tally to be endorsed by the RAPC. A Proposal not affirmatively recommended by the PRC requires a 75% affirmative vote in both the House and Senate Tally to achieve RAPC endorsement.

A RAPC vote on a Proposal can have three outcomes: RAPC recommends the Proposal to the Board unmodified, RAPC recommends approval of the Proposal as modified, or RAPC recommends rejection of the Proposal.

#### *4.4.1. RAPC Recommends Approval*

The RAPC votes to recommend that the Board approve the Proposal without changes.

##### **4.4.1.1. COSR Formal Opposition to Recommended Proposal**

If RAPC votes to recommend a Proposal without change, the COSR has one week to register its opposition to the endorsed Proposal with the RAPC. If the COSR registers its opposition, the RAPC is required to engage with the COSR, including at least two discussions to attempt to reach a mutually agreeable solution. These discussions will be open to the public and held within 4 weeks of the COSR's notification of opposition.

#### *4.4.2. RAPC Recommends Approval with Changes*

If RAPC makes changes to the Proposal during its vote to recommend approval, the 75% voting threshold will apply because the Proposal is no longer the same as was recommended by the PRC.

##### **4.4.2.1. COSR Requests Additional Public Review**

If RAPC makes changes to a Proposal when voting on it, COSR leadership will be notified and can elect to initiate an additional public review if COSR determines the RAPC-recommended Proposal to be substantially different from the Proposal submitted to the RAPC by the PRC. The COSR must notify the chair of the PRC that it would like additional public review within two weeks of the RAPC vote on the changed Proposal.

Once COSR notifies the PRC leadership, the changed Proposal will be posted to the WPP website for a two-week public comment window. The PRC will summarize the comments received, but no further changes are made to the Proposal.

##### **4.4.2.2. COSR Formal Opposition to RAPC Endorsement with Changes**

If RAPC endorses a Proposal with changes, the COSR has two weeks to register its opposition to the endorsed Proposal with RAPC. If the COSR registers its opposition, the



RAPC is required to engage with the COSR, including at least two discussions to attempt to reach a mutually agreeable solution. These discussions will be open to the public and held within 4 weeks of the COSR's notification of opposition. These discussions will take place in parallel with any additional public review process requested by COSR per section 4.4.2.1).

#### *4.4.3. RAPC Rejects*

If RAPC votes to reject the Proposal, the Proposal terminates (i.e., is not reviewed by the Board), unless the RAPC decision is appealed to the Board.

##### **4.4.3.1. Appeal of RAPC Rejection**

If the RAPC votes to reject a Proposal or fails to vote to recommend approval of a Proposal within 30 Days of PRC action, any person may appeal to the Board to review and vote on a Proposal. Such an appeal must be submitted to the Program Administrator within 2 weeks after the RAPC rejection vote or within two weeks after the RAPC's failure to take action within 30 Days after PRC action. Whether to entertain the appeal is solely within the Board's discretion.

#### **4.5. Board Interaction**

The Board will receive all Proposals (including all comments received during the review process) for discussion and approval that:

- Have been approved by RAPC with no opposition by COSR;
- Have been rejected or not acted upon by the RAPC but has been appealed by a stakeholder to the Board;
- Have been approved by the RAPC but identified by COSR as substantially different than the PRC version and have undergone additional public review; or
- Are formally opposed by the COSR, with RAPC and COSR also having met at least two times to attempt a mutually agreeable solution.

##### *4.5.1. Study Session as Needed*

The Program Administrator will work with the Task Forces and the PRC to host study sessions for the Board, at the discretion of the Board, on Proposals that have come before the Board for approval.

##### *4.5.2. Stakeholder Comment*

Per Board procedures, members of the public, RAPC representatives, COSR members, or other stakeholders may comment during a public Board meeting on a Proposal under consideration by the Board (including a Proposal that has been placed on the Board's consent agenda). It is highly encouraged that stakeholders opposing the Board's



approval of a Proposal engage in the public and committee review process on such Proposal to voice concerns and provide written documentation throughout.

*4.5.3. Vote*

Per Board procedures, the Board will act on the Proposal by either:

- Approval – in which case implementation of the Proposal is initiated;
- Rejection – in which case the Proposal terminates; or
- Changes needed – the Board may determine either to make changes and approve an updated Proposal or to send the Proposal back to any stage in the drafting or review process (at the Board’s discretion) with feedback or guidance for necessary updates and repeat all subsequent review processes.

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