WESTERN POWERPOOL



Western Resource Adequacy Program

108 Forward Showing Submittal Process

100 – Forward Showing

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108 Forward Showing Submittal Process

1. Introduction

Forward Showing (FS) Submittal Process Business Practice Manual (BPM) 108 describes when and how each Participant provides its projected load and resource portfolio data to meet the Western Resource Adequacy Program (WRAP) FS Capacity Requirements and FS Transmission Requirements in the months of the Binding Seasons. The Western Power Pool's (WPP) FS Program is the forward-looking planning portion of the WRAP that aims to ensure the WRAP footprint has sufficient capacity to adequately serve projected peak load under a variety of possible scenarios. The FS Program includes the Advance Assessment (see *BPM 101 Advance Assessment*) that recommends FS Planning Reserve Margins (FSPRM) for Board approval and provides Qualifying Capacity Contribution (QCC) values for registered resources (see *BPM 105 Qualifying Resources*). The FSPRMs are applied to the P50 load forecasts of each Participant to set the FS Capacity Requirement for each month of a Binding Season. The FS Capacity Requirements shall be met by QCC from Qualified Resources and delivered consistent with the Tariff's FS Transmission Requirements, at a minimum.

1.1. Intended Audience

BPM 108 is intended for WRAP Participants and other interested individuals or entities. BPM 108 is particularly useful for those individuals responsible for the Participant Organization's FS Submittal, which includes the FS Demonstration of the FS Capacity Requirement and FS Transmission Requirement, along with FS supporting materials on Qualifying Resource Capability Testing, treatment of Thermal Resources without North American Electric Reliability Corporation (NERC) Generating Availability Data System (GADS) data, Hydro Resource QCC results, late registered resources, and Transition Period exceptions (Excused Transition Deficits and Joint Contract Accreditation Forms (JCAFs)).

1.2. What You Will Find in This Manual

This document describes: the FS Deadline, Deficiency Notices and FS Cure Deadline Dates; the required FS Submittal materials, including the FS Demonstration and FS supporting materials, along with associated Senior Official Attestations; and Program Operator and Program Administrator review of Participants' FS Submittals.

1.3. Purpose

BPM 108 is intended to assist Participants in completing their FS Submittals, including the FS Demonstration and the required supporting material, on or before the FS Deadline for the applicable Binding Season.

1.4. Definitions

All capitalized terms that are not otherwise defined in BPM 108 have the meaning set forth in the Tariff or in another BPM.

Catastrophic Failure Monthly Report: A demonstration by a Participant with an approved catastrophic resource failure exemption that either the circumstances necessitating the exception have not changed or that Qualifying Resources have become available, and the Participant has acquired them and no longer requires the exception.

Cure Deadline: The date 120 Days after the FS Deadline after which any uncured deficiencies in a Participant's FS Submittal shall be assessed a FS Deficiency Charge, except as modified for the Rockies Subregion for Winter 2027-2028.

Cure Period: The time period 120 Days after the FS Deadline during which a Participant shall submit revisions to its FS Submittal to fully cure all identified deficiencies, except as modified for the Rockies Subregion for Winter 2027-2028.

FS Demonstration: A demonstration that a Participant has met satisfactorily its FS Capacity Requirement and FS Transmission Requirement.

FS Instruction Manual: A set of instructions available on the WPP website.

Monthly Transmission Exception Check-In: A demonstration by a Participant with an approved Monthly Transmission Exception for Enduring Constraints or Future Firm ATC Expected that its inability to meet the FS Transmission Requirement has not changed.

2. FS Deadline, Deficiency Notices and FS Cure Deadline Dates

The Forward Showing Program has two Binding Seasons: The Summer Season and the Winter Season. The FS Deadline, serving of Deficiency notices, and FS Cure Deadline for the Summer Season and Winter Season are 5:00 pm Pacific Prevailing Time (PPT) on the respective date indicated in Table 1 (or,Table 2 as applicable). The Program Administrator shall serve a deficiency notice to each Participant where one or more deficiencies have been identified as part of the FS Submittal by 5:00 pm PPT on the respective date indicated in Table 1. Participants who served a deficiency notice may cure their deficiencies by resubmitting their FS Submittal with the missing or correct data by 5:00 pm PPT on the respective date indicated in Table 1. Deficiencies uncured by the FS Cure Deadline will be subject to the FS Deficiency Charge (see *BPM 107 Forward Showing Deficiency Charge*).

Table 1. FS Deadline, Deficiency Notices and FS Cure Deadline Dates

	Winter Season	Summer Season
FS Deadline	March 31 of each Year	October 31 of each Year
Program Administrator serve Deficiency notices	By May 30 of each Year	By December 30 of each Year
FS Cure Deadline	July 29 of each Year	February 28 of each Year

2.1. Rockies Subregion Winter 2027-2028 Dates

For a Participant in the Rockies Subregion, the FS Deadline and succeeding review deadline and Cure Period date are modified as shown in Table 2 for the Winter 2027-2028 Binding Season only.

Table 2. Rockies Subregion FS Deadline, Deficiency Notices and FS Cure Deadline Dates for Winter 2027-2028

	Winter Season 2027-2028
FS Deadline	July 1, 2027
Program Administrator serve Deficiency notices	By August 10, 2027
FS Cure Deadline	October 11, 2027

3. Forward Showing Submittal Materials

A Participant's FS Submittal shall include a FS Demonstration with the necessary information for each Binding Season to demonstrate the Participant has sufficient capacity and transmission service to satisfy the FS Capacity Requirement and FS Transmission Requirement. The FS Demonstration shall include the Participant's: load forecast for the upcoming Binding Season (see *BPM 103 Forward Showing Capacity Requirement*); demonstration of Qualifying Capacity Contribution (QCC) to meet its FS Capacity Requirement which can be from Qualifying Resources or contracts; demonstration of the FS Transmission Requirement needed for the reliable delivery of the QCC of the Participant's Qualifying Resources and Contracts to the Participant's load; applicable Monthly Transmission Exception requests and associated Senior Official Attestations; and a Senior Official Attestation for the FS Demonstration. In addition to the FS Demonstration, the FS Submittal shall include supporting FS materials including

information on Qualifying Resource Capability Testing, Thermal Resources without GADS data, Hydro Resource QCCs and forced outages, late registered resources, and Transition Period exceptions.

3.1. FS Demonstration

As described in the FS Instruction Manual, a Participant must provide the Program Operator with the following information on loads, Qualifying Resources, contracts, and WRAP Qualifying Transmission to demonstrate it has satisfactorily met the FS Capacity Requirement and FS Transmission Requirement. A Participant's FS Demonstration shall be accompanied by the Senior Official Attestation found in Appendix A – FS Demonstration Attestation. The Program Operator determines whether a Participant has met its FS Capacity Requirement and FS Transmission Requirement using the method described in Appendix G – FS Summary.

3.1.1. Loads

Each Participant shall provide the following FS Demonstration load information as described in the FS Instruction Manual:

- Load name assigned for identification purposes and used for transmission mapping
- Balancing Authority Area (BAA) in which the load is located
- The load point of delivery (POD) on the transmission system
- Forecasted monthly peak demand (see methodology in *BPM 103 Forward Showing Capacity Requirement*)

A Participant shall include all loads in its FS Demonstration for which it is responsible as well as documenting all loads it seeks to exclude (see *BPM 103 Forward Showing Capacity Requirement*): i.e. all loads within the western interconnection for which it is the LRE (or the exclusive wholesale electricity provider to the LRE) that are not covered by another resource adequacy program.

A Participant responsible for loads in multiple Subregions seeking to use the lower Monthly FSPRM may submit a single FS Submittal if the Participant can demonstrate sufficient WRAP Qualifying Transmission from the load in the Subregion with the lower Monthly FSPRM to the load in the Subregion with the higher Monthly FSPRM. The Participant will demonstrate WRAP Qualifying Transmission in the quantity equal to the difference between the two FSPRMs multiplied by the amount of load in the Subregion with the higher FSPRM. For example, if Region A has a FSPRM of 20% in July and Region B has a FSPRM of 15% in July, and Participant has 1000 MW of load in Region A, the Participant will demonstrate (20% - 15%) * 1,000 MW or 50 MW of WRAP Qualifying Transmission from its load in Region B to its load in Region A. This WRAP

Qualifying Transmission shall be distinct from any transmission demonstrated for delivering Qualifying Resources to participant load. See *BPM 103 Forward Showing Capacity Requirement* for information on calculating the FS Capacity Requirement in circumstances where loads from multiple Subregions are included in a single FS Submittal. In addition, a Participant responsible for loads in multiple Subregions seeking to use the higher monthly FSPRM may also submit a single FS Submission if the Participant can sign the FS Demonstration attestation in Appendix A.

All load submitted by a Participant within a single FS Demonstration must be able to be served interchangeably by all Qualifying Resources and Qualifying Contracts in that same FS Demonstration, without the expectation that additional transmission rights will be required to deliver resources to load. In accordance with this, a Participant may be required to submit separate FS demonstrations, even as to loads residing in the same Subregion, if the Program Administrator determines it is not practicable to treat such loads as if they can share in load and resource diversity for reasons that may diminish the integrity of WRAP reliability metrics, including but not limited to, if the Participant is responsible for (i) loads that are geographically distinct; (ii) loads that are separated by constrained transmission paths; or (iii) loads and resources that are not operated collectively (see *BPM 103 Forward Showing Capacity Requirement*).

Participant loads that cannot be served with a common set of Qualifying Resources and Qualifying Contracts shall therefore be submitted in separate FS Demonstrations. Each FS Demonstration will have a unique FS Capacity Requirement and a unique FS Transmission Requirement, and each of those two requirements shall be met individually and separately from any other FS Demonstrations submitted by a Participant.

3.1.2. Qualifying Resources

As part of the FS Demonstration, each Participant shall submit Qualifying Resources to satisfy the FS Capacity Requirement as described in the FS Instruction Manual. Qualifying Resources can be fully or partially owned by the Participant. The Participant shall use QCCs supplied by the Program Operator as part of the Advance Assessment (see *BPM 101 Advance* Assessment) unless the resource is being registered late (see *BPM 105 Qualifying Resources*). The components of a hybrid resource should be described separately (for example, solar separately from a battery) and the overall limits of the facility considered when submitting the QCC for each component (see *BPM 101 Advance Assessment* -*Data Request Instruction Manual* for hybrid resource limitations). The Qualifying Resource information provided in the FS Demonstration should be consistent with the information provided by the Program Operator as a result of Resource Registration (see *BPM 105 Qualifying Resources*).

If a Participant experiences a catastrophic Qualifying Resource failure and is unable to replace the QCC on commercially reasonable terms prior to the FS Deadline, the Participant can seek an exception by submitting the attestation in Appendix B – Catastrophic Resource Failure Exception. For each month following the FS Deadline that a Participant sought a catastrophic resource failure exception, the Participant shall complete a Catastrophic Failure Monthly Report (available on the WPP website) demonstrating either:

- the circumstances necessitating the exception have not changed; or
- that Qualifying Resources (either the ones experiencing the catastrophic failure or other resources) have become available, and the Participant has acquired them and no longer requires the exception.

The Catastrophic Failure Monthly Report will be due on the last day of each Month and will cover any catastrophic Qualifying Resource exception requested for the upcoming (or ongoing) Binding Season, except the Month directly preceding the earliest Month that is the subject of catastrophic Qualifying Resource request. For example, if a Participant has requested a catastrophic Qualifying Resource exemption for July and August of 2035 at the FS Deadline (October 31, 2034), such Participant will submit a Catastrophic Failure Monthly Report for the July and August exception requests on or before the last days of November and December, 2034, and on or before the last days of January, February, March, April, and May, 2035, but need not submit such report for the July exception request on the last day of June 2035. The Participant will submit a Catastrophic Failure Monthly Report solely as to the August exception request on or before the last day of June 2035.

If at any time there is a change in the circumstances that necessitated the exception such that the reasons for the exception no longer exist, or the Participant acquires other Qualifying Resources, the Participant will describe and demonstrate such acquisition in the next Catastrophic Failure Monthly Report, and upon acceptance of the demonstration, need not continue to provide a Catastrophic Failure Monthly Report for the exception no longer needed. Failure to submit a required Catastrophic Failure Monthly Report will result in an assessment of a Deficiency Charge, unless the deficiency is cured with seven days of notice of non-compliance.

The Program Operator and Program Administrator will seek to inform the Participant whether its exception request has been accepted within 14 Days of receiving the request. The impact of a successful exception request is explained in *BPM 107 Forward Showing Deficiency Charge*. If a Participant submits a request for exception that WPP

denies in whole or in part, the Participant may appeal such denial to the Board of Directors. To make such appeal, the Participant should submit an appeal, in the form outlined on the WPP website, including all information the Participant considers necessary to support its view that WPP erred in denying the requested exception. Any such appeal must be submitted no later than 14 Days after WPP's denial of the exception request. The Board may request that the Participant provide such additional information as the Board considers necessary for its action on the appeal. The timing of the Board's action on an appeal is in the Board's discretion.

3.1.3. Contracts

Each Participant shall also provide notification and representation of contractual purchases and sales as described in *BPM 106 Qualifying Contracts* and in the FS Instruction Manual.

3.1.4. Transmission

Each Participant shall demonstrate the FS Transmission Requirement. As described in the FS Instruction Manual, a Participant shall demonstrate it has secured transmission rights sufficient to deliver a MW quantity equal to at least 75% of the MW quantity of its FS Capacity Requirement. The FS Transmission Requirement must be met with WRAP Qualifying Transmission from the Participant's Qualifying Resource(s) or from the delivery points for the Qualifying Resources identified for its Net Contract QCC (or for its RA Transfer) to the Participant's load. The FS Demonstration shall include information on a Participant's transmission service reservations that it plans to utilize in the upcoming Binding Season to meet its FS Transmission Requirement. The FS Demonstration shall also map Qualifying Resources (see Section 3.1.2) and contracts (see Section 3.1.3) to a Participant's loads (see Section 3.1.1) using the transmission service reservation information provided, as described in the FS Instruction Manual. A Participant that has Qualifying Resource in its balancing area, but is not a transmission service provider – and is therefore unable to provide transmission service reservation information – will attest that it has the transmission rights from the generation to the load on its system (see Appendix J – Transmission Rights Attestation).

3.1.4.1. Transmission Exceptions

If a Participant's FS Demonstration does not include the required transmission service reservations to satisfy the FS Transmission Requirement, the Participant may request Monthly Transmission Exceptions. As described in more detail below, there are four categories of Monthly Transmission Exception available to a Participant [terminology mirrors terms used in standard form Open Access Transmission Tariffs (OATTs) and on Open Access Same-time Information Systems (OASIS)]:

- Enduring Constraints;
- Future Firm Available Transmission Capability (ATC) Expected;
- Transmission Outages and Derates; and
- Counterflow of a Qualifying Resource.

All Participants requesting a Monthly Transmission Exception are responsible for submitting the completed Transmission Exception request form found on the WPP website, along with the Senior Official Attestation found in Appendix C – Monthly Transmission Exception General Attestation – as part of their FS Submittal along with their FS Demonstration.

The Program Operator will review a Participant's Monthly Transmission Exceptions and notify the Participant of the status of its Monthly Transmission Exceptions for each month requested by 5:00 pm PPT on the 60th day after the FS Deadline.

If a Monthly Transmission Exception is denied (either because it is invalid or because circumstances changed and transmission has become available during the Program Operator's review of the Monthly Transmission Exception), the Participant will have the opportunity to cure its Transmission Deficiency on or before the last day of the Cure Period established for the relevant FS Submittal. The Participant may also appeal the rejection to the Board.

The Program Operator and Program Administrator will seek to inform the Participant whether its exception request has been accepted within 14 Days of receiving the request. If a Participant submits a request for exception that WPP denies in whole or in part, the Participant may appeal such denial to the Board of Directors. To make such appeal, the Participant should submit an appeal, in the form outlined on the WPP website, including all information the Participant considers necessary to support its view that WPP erred in denying the requested exception. Any such appeal must be submitted no later than 14 Days after WPP's denial of the exception request. The Board may request that the Participant provide such additional information as the Board considers necessary for its action on the appeal. The timing of the Board's action on an appeal is in the Board's discretion.

For each month following the FS Deadline that a Participant sought a Monthly Transmission Exception for Enduring Constraints or Future Firm ATC Expected, the Participant shall complete a Monthly Transmission Exceptions Check-in (available on the WPP website) demonstrating either:

- the circumstances necessitating the exception have not changed; or
- transmission has become available and the Participant has acquired it; or

- the Participant has acquired a different Qualifying Resource with the necessary firm transmission and no longer requires the Monthly Transmission Exception.

The Monthly Transmission Exception Check-Ins will be due on the last day of each Month and will cover any Monthly Transmission Exceptions requested for the upcoming (or ongoing) Binding Season, except the Month directly preceding the earliest Month that is the subject of the Monthly Transmission Exception request. For example, if a Participant has requested a Monthly Transmission Exception for July and August of 2035 at the FS Deadline (October 31, 2034), such Participant will submit a Monthly Transmission Exception Check-In for the July and August exception requests on or before the last days of November and December, 2034, and on or before the last days of January, February, March, April, and May, 2035, but need not submit such check-in or the July exception request on the last day of June 2035. The Participant will submit a Monthly Transmission Exception Check-In solely as to the August exception request on or before the last day of June 2035.

If at any time, the Participant either acquires the necessary transmission or acquires a different resource and associated transmission, the Participant will describe and demonstrate such acquisition on the next Monthly Transmission Exception Check-In, and upon acceptance of the demonstration, need not continue to provide Monthly Transmission Exception Check-Ins for the exception no longer needed. Failure to submit a required Monthly Transmission Exception Check-In or rejection of the Monthly Transmission Exception Check-In in part or in whole (e.g. if contrary information is available to the Program Administrator, indicating transmission has become available for the month in question) will result in an assessment of a Deficiency Charge unless the deficiency is cured within seven days of notice of non-compliance.

3.1.4.1.1. Enduring Constraints

The Enduring Constraints Monthly Transmission Exception may be granted if the Participant is unable to demonstrate the necessary and sufficient WRAP Qualifying Transmission on any single segment of a source-to-sink path for a resource (exceptions will not be granted for two segments of a source-to-sink path) and the Participant demonstrates:

- there was no sufficiently firm ATC posted by a transmission service provider at the FS Deadline on the applicable segment for the months required; and
- there was remaining available ATC (non-firm ATC after the fact) for all CCHs in the same season of the most recent year for which CCHs have been calculated in any Subregion in which the segment exists; or

- if the path was constrained in at least one CCH in the most recent same season from the most recently available CCH data set in any Subregion in which the segment exists, that the Participant is:
    - constructing or contracting for a new local resource for at least the amount of Monthly Transmission Exception requested; or
    - pursuing long-term firm rights by entering the long-term queue and taking all appropriate steps for at least the amount of Monthly Transmission Exception requested.

If the required transmission rights for the applicable segment are only available for a duration of more than one year at the FS Deadline, a Participant is not required to obtain that service to qualify for the Enduring Constraints exception. However, in that circumstance, the Participant shall not qualify for an Enduring Constraint exception for the same path (or across the same constraint) for the same month of the same season of the subsequent year if the Participant again declines the transmission rights that are available for a duration of more than one year.

In addition to the Monthly Transmission general exception discussed above in Section 3.1.4.1, a Participant requesting an Enduring Constraint Monthly Transmission Exception will need to include the Senior Official Attestation found in Appendix D – Enduring Constraint Additional Attestation as part of its FS Submittal.

3.1.4.1.2. Future Firm ATC Expected

The Future Firm ATC Expected exception may be granted when there is a reasonable expectation that sufficiently firm ATC will be made available following the FS Deadline and all the following criteria are met:

1. WRAP Qualifying Transmission is not posted or available prior to the FS Deadline; and
2. The Participant provides evidence that its transmission service provider has released additional WRAP Qualifying Transmission on the applicable path for all CCHs that have been calculated in any Subregion in which the applicable transmission segment exists for the same season of the most recent year for which CCHs have been calculated for the Subregion following the FS Deadline; and
3. The Participant demonstrates that the amount of FS Transmission Requirement being requested for the Future Firm ATC Expected exception is equal to or less than the minimum volume of WRAP Qualifying Transmission rights ATC released in the previous year's CCHs that have been calculated in any Subregion in which the applicable transmission segment exists for the appropriate Binding Season.

If the required ATC on the applicable segment for the Month(s) needed is only posted or available prior to the FS Deadline for a duration of more than one year, a Participant is not required to obtain that service to qualify for the Future Firm ATC Expected exception. However, in that circumstance, the Participant shall not qualify for a Future Firm ATC Expected exception for the same path (or across the same constraint) for the same month of the same season of the subsequent year if the Participant again declines the ATC for transmission service rights that are available for a duration of more than one year.

The total amounts of Future Firm ATC Expected exceptions on specific paths is limited to the amount of transmission demonstrated to likely become available. If multiple Participants have requested a Future Firm ATC Expected exception on the same path, the available volume will be granted on a pro-rata basis to requesting Participants based on the size of their requests.

3.1.4.1.3. Transmission Outages and Derates

The Transmission Outages and Derates exception may be granted when a Participant that has not met its FS Transmission Requirement demonstrates that all of the following criteria are met:

1. That an applicable segment of its existing transmission service rights from its source to sink path for its Qualifying Resource is expected to be derated or out-of-service and that additional ATC of WRAP Qualifying Transmission is not otherwise available; and
2. The duration of the Transmission Outages and Derates exception request coincides with the months of the outage or derate; and
3. The volume of the Transmission Outages and Derates exception being requested is either:
    a. equal to or less than the reduction in the Participant's existing transmission service rights on that path for the applicable derate or outage period; or
    b. equal to or less than the WRAP Qualifying Transmission for the applicable derate or outage period that would otherwise be posted and available for reservation were it not for the transmission limitation.

If multiple Participants have requested a Transmission Outages and Derates exception on the same path, the available volume (per Section 3.1.4.1.3 (3) above) will be granted on a pro-rata basis to requesting Participants based on the size of their requests.

3.1.4.1.4. Counterflow of a Qualifying Resource

A Counterflow of a Qualifying Resource exception may be granted if a Participant demonstrates that either:

1. The Participant's use of WRAP Qualifying Transmission service in connection with the delivery of capacity from Participant's Qualifying Resource (or from the resource associated with its Net Contract QCC) to Participant's load (or other qualifying delivery point permitted by the WRAP); or
2. A second Participant's use of WRAP Qualifying Transmission service in connection with the delivery of capacity from the second Participant's Qualifying Resource (or from the Qualifying Resource associated with its Net Contract QCC) to the second Participant's load (or other qualifying delivery point permitted by the WRAP)
   provides a direct and proportional counterflow transmission that supports the first Participant's delivery of capacity from the first Participant's Qualifying Resource (or from the Qualifying Resource associated with its Net Contract QCC) to the first Participant's load (or other qualifying delivery point permitted by the WRAP) Qualifying Resource to its load.

If the Counterflow of a Qualifying Resource exception is requested under subpart (2) of this Section, the Participant requesting the exception shall include a written acknowledgement from the second Participant that it is aware of such exception request. Counterflow of a Qualifying Resource must be directly between two BAAs. Counterflows that involve three or more BAAs will not qualify for the Counterflow of a Qualifying Resource exception.

3.1.5. Planned Outages

Per the requirements of Tariff Section 16.2.8, any planned outages during a Binding Season must be taken from a Participant's surplus (above its FS Capacity Requirement).

3.1.5.1. Planned Outages underway at the time of FS Submittal

Any Qualifying Resource that is out of service at the time of the FS Deadline and is planned to remain out of service for the first five or more days of a month in the Binding Season cannot have such Qualifying Resource's QCC counted toward meeting the Participant's FS Capacity Requirement for that month.

To ensure QCC from resources is not utilized to meet a monthly FS Capacity Requirement during the planned outage, the Capacity associated with such resources shall be deducted by identifying the planned outages in the FS Demonstration.

3.1.5.2. Planned Outages not underway at the time of the FS Submittal

Participants have the discretion to take planned outages at any time during the Binding Season but are required to take planned outages out of their surplus FS Demonstration capacity or to procure additional supply to replace such capacity on outage. This requirement ensures the participant's FS Capacity Requirement is available during the Operation Program timeframe.

Participants may provide information on Qualifying Resources that are planned to be out of service during the Binding Season as part of their FS Submittal to ensure QCC from those resources is not utilized to meet a monthly FS Capacity Requirement during the planned outage. Capacity associated with such resources shall be deducted from the FS Demonstration for such month(s).

Each Participant shall provide a Senior Official Attestation (found in Appendix E – Planned Outages Attestation) by the FS Deadline that:

- The sum of expected planned outages at any one time during the Binding Season will be equal to or less than the surplus stated in its FS Demonstration at the time of such planned outage, or
- The Participant is expected to procure the necessary capacity or energy to meet the Operations Program requirements regardless of planned outage schedules.

A planned outage shall not justify a waiver of, or exception to, a Participant's Holdback Requirement or Energy Deployment obligations.

3.2. Forward Showing Supporting Materials

In addition to the FS Demonstration (see Section 3.1), accompanying Monthly Transmission Exception Requests (see Appendix C – Monthly Transmission Exception General Attestation) and required Senior Official Attestations, a Participant's FS Submittal shall also include supporting information on Qualifying Resource testing, Thermal Resources without GADS data, Hydro Resource QCCs, late registered resources, and transition exceptions.

3.2.1. Testing

As described in *BPM 105 Qualifying Resources*, Participants shall perform annual Operational Tests on all Qualifying Resources. In addition, Capability Tests shall be required for Thermal Resources, Long Duration Storage resources, and Demand Response Resources. Each Participant's FS Submittal must include a completed resource testing report, employing for such purpose the resource testing form that is made available on the WPP website.

3.2.2. Thermal Resources that are not Required to Report GADS Data

BPM 101 Advance Assessment describes the data request sent out by the Program Operator to gather the information required to calculate QCC values for Qualifying Resources. The Advance Assessment data request includes NERC GADS or equivalent outage data that can be used to calculate the outage rates and factors for existing Thermal Resources. However, as discussed in *BPM 105 Qualifying Resources*, certain Thermal Resources are not required to report GADS data. For all Qualifying Resources not providing GADS reporting data, the Participant will be required to provide a Senior Official Attestation (provided in Appendix F – Non-GADS QCC Calculation Attestation) as part of its FS Submittal that attests the resource is not subject to GADS reporting and the FS Demonstration submitted by the Participant is an accurate depiction of either the historical performance or historical outage data of the resource.

3.2.3. Hydro Resources

As discussed in *BPM 105 Qualifying Resources*, QCCs for Storage Hydro resources are calculated by the Participant owners. The result of those calculations shall be submitted as part of a Participant's FS Submittal in the format described in *BPM 105 Qualifying Resources* and the FS Instruction Manual. The Storage Hydro QCC Methodology utilizes an equivalent demand forced outage rate (EFORd) value as an input. Participants shall supply as part of their FS Submittal a NERC GADS report showing the EFORd value. For all Storage Hydro resources that do not report NERC GADS data, the Participant shall similarly calculate an EFORd value from historical performance data and the non-GADS outage calculation tool as posted on the WPP website. The Participant will provide the output of this tool and a Senior Official Attestation (provided in Appendix F – Non-GADS QCC Calculation Attestation) attesting that the resource is not subject to GADS reporting and that the Participant has utilized the non-GADS outage calculation tool with complete and correct information. Participants will also provide a Senior Official Attestation (in the form provided in *Appendix 1*) that their calculation of the Storage Hydro QCC value is correct, accurate, and in compliance with the requirements of the Tariff.

3.2.4. Late Registered Resources

As discussed in *BPM 105 Qualifying Resources*, resources that are unable to register by the deadline of the Advance Assessment data request (see *BPM 101 Advance Assessment*) may still be able to register prior to the FS Deadline so long as the necessary information is provided.

3.2.5. Transition Exceptions

BPM 109 Forward Showing Transition Period discusses how a new Participant application to the Program Administrator prior to March 31, 2027, shall be required to

select an initial Binding Season during the Transition Period (Summer seasons for 2025, 2026, and 2027, and the Winter seasons for 2025-2026, 2026-2027, and 2027-2028). During its Transition Binding Seasons, a Participant may be able to request potential reductions in Deficiency Charges as described below.

3.2.5.1. Excused Transition Deficits

During a Participant's Transition Binding Seasons, Deficiency Charges otherwise applicable to the Participant under Section 17.1 of the Tariff, and calculated under Section 17.2, shall be reduced to the extent the Participant has an Excused Transition Deficit (ETD). To obtain an ETD for a Binding Season, the Participant must provide a Senior Official Attestation, as included in *BPM 109 Forward Showing Transition Period*.

3.2.5.2. Legacy Contract – No Joint Contract Accreditation Form (JCAF) Option

In addition to an ETD, during the Transition Period a Participant may be able to reduce its Monthly Capacity Deficiency to the extent the deficiency is due to the Participant's failure to obtain assent to a JCAF from the supplier under a Legacy Agreement (a power supply agreement entered into prior to October 1, 2021), as explained in *BPM 109 Forward Showing Transition Period* (the No-JCAF Option). To obtain that relief, the Participant must provide a Senior Official Attestation (in the form set forth in *BPM 109 Forward Showing Transition Period*) as part of its FS Submittal attesting that the Participant made commercially reasonable efforts to execute the required JCAF with the supplier under the Legacy Agreement, but the supplier was unable or unwilling to counter sign the JCAF.

4. Cure Period

The Program Operator and Program Administrator shall review Participants' FS Submittals and the Program Administrator shall serve deficiency notices in writing to any Participant that has not, by the FS Deadline shown in Table 1, submitted all required FS Submittal information and materials (see Section 3), or that has submitted information or materials that the Program Operator has found is or may be incorrect or deficient. Participants served a deficiency notice will have until the dates shown in Table 1 to cure their deficiencies. Deficiencies uncured by the time of the FS Cure Deadline shall be subject to the FS Deficiency Charge (*see BPM 107 Forward Showing Deficiency Charge*).

Appendix A – FS Demonstration Attestation

I, the undersigned, who, as [title], serves as a senior official of [Participant], hereby attest that I have reviewed [Participant]'s FS Submittal provided this day by [Participant] to Western Power Pool, and that to the best of my knowledge and belief following due inquiry appropriate to the reliability and resource adequacy matters addressed herein, and that the statements therein are true, correct and complete per all of the requirements of Business Practice Manual 108.

Appendix B – Catastrophic Resource Failure Exception Attestation

I, the undersigned, who, as [title], serves as a senior official of [Participant], hereby attest that, as set forth in the accompanying request for an exception from the FS Capacity Requirement for the [specify season] Binding Season, (i) [Participant] has experienced a catastrophic failure of its [identify] Qualifying Resource[s] due to an event of Force Majeure as defined by Section 8.1 of the WRAP Tariff; (ii) [Participant] is unable to replace the QCC quantity of such Qualifying Resource[s] on commercially reasonable terms prior to the FS Deadline of [specify date] as a result of the timing and magnitude of such catastrophic failure and its consequences; and (iii) the statements in the accompanying FS Capacity Requirement exception request, including the information provided therein on the nature, causes and consequences of the catastrophic failure[s], and [Participant]'s specific, concrete efforts prior to the referenced FS Deadline to secure replacement Qualifying Resources for the [specify season] Binding Season, are true, correct and complete to the best of my knowledge and belief following due inquiry appropriate to the reliability and resource adequacy matters addressed therein.

Appendix C – Monthly Transmission Exception General Attestation

I, the undersigned, who, as [title], serves as a senior official of [Participant], hereby attest that, as set forth in the accompanying request for an exception from the FS Transmission Requirement for the [specify season] Binding Season, (i) [Participant] meets the stated WRAP requirements for the exception; and (ii) the statements in the accompanying FS Transmission Requirement exception request are true, correct and complete to the best of my knowledge and belief following due inquiry appropriate to the reliability and resource adequacy matters addressed therein.

Appendix D – Enduring Constraint Additional Attestation

I further attest, in support of [Participant]'s request for the Enduring Constraints Transmission Exception, that (i) no ATC for transmission service rights for which the exception is requested is available (either from the transmission service provider or through a secondary market) as of the FS Deadline, on the applicable segment for the Month(s) needed (for a duration of one year or less) at the applicable Open Access Transmission Tariff rate or less; (ii) [Participant] has taken commercially reasonable efforts to procure firm transmission service rights, and (iii) [Participant] has posted a request for the necessary firm transmission rights on the relevant bulletin board, (i.e., OASIS) prior to the FS Deadline.

Appendix E – Planned Outages Attestation

I, the undersigned, who, as [title], serves as a senior official of [Participant], hereby attest that: (i) as set forth in [Participant]'s FS Submittal provided this day by [Participant] to Western Power Pool, Participant has included information on all Qualifying Resources that are currently out of service with a scheduled return date that falls during the [specify season] Binding Season; (ii) Participant [has] [does not have] certain additional outages at Qualifying Resources that are planned to occur during the [specify season] Binding Season but have not yet begun at the time of submission of the FS Submittal; (iii) Participant has made reasonable efforts to obtain and provide information on any such additional outages, but such data cannot be supplied with reasonable specificity; (iv) the aggregate of any such additional outages is either expected to be equal to or less than [Participant]'s remaining surplus as defined by [Participant]'s Portfolio QCC in excess of [Participant]'s FS Capacity requirement or to the extent it is not excess it will be replaced with the necessary capacity or energy to meet the Operations Program requirements, consistent with Section 16.2.8.2 and Part III of the Tariff; and (v) that the foregoing statements are true, correct and complete to the best of my knowledge and belief following due inquiry appropriate to the reliability and resource adequacy matters addressed herein.

Appendix F – Non-GADS QCC Calculation Attestation

I, the undersigned, who, as [title], serves as a senior official of [Participant], hereby attest that the resource that is the subject of this form is not subject to GADS data reporting; and that the resource's performance data (historical output or historical outage evaluation) for the Capacity Critical Hours of the [specify season] Binding Season is accurately accounted for in the accompanying FS Submittal.

Appendix G – FS Summary

A Participant's total Portfolio QCC is defined as the Participant's Resource QCC plus its Net Contract QCC plus its total RA transfer minus its planned outages for each month of the Binding Season.

$$Portfolio\ QCC = Resource\ QCC + Net\ Contract\ QCC + Total\ RA\ Transfer - Planned\ Outages$$

Where:

Resource QCC is the summation of all QCC values for the Participant's Qualified Resources calculated for each month of a Binding Season.

$$Resource\ QCC = \sum QCC\ of\ all\ Participant\ Qualifying\ Resources$$

The Net Contracted QCC is a monthly value equal to the sum of the Participant's Contract QCCs. Import contracts (purchases) are additive to the Participant's QCC value and exports (sales) are a negative QCC value. The Net Contract QCC formula is as follows:

$$Net\ Contract\ QCC = \sum QCC\ of\ all\ Participant\ Qualified\ Contracts$$

Resource adequacy transfers are added to the purchasing Participant's Portfolio QCC value and subtracted from the selling Participant's Portfolio QCC value. The contracts for these transfers will be provided to the Program Operator for validation.

$$Total\ RA\ Transfer = \sum Participant\ RA\ Transfer\ Contracts$$

The Participant's Total Portfolio QCC should be at least equal to the Participant's FS Capacity Requirement for each month of the Binding Season. If the Participant's Total Portfolio QCC meets or exceeds that threshold, then the Participant's FS Capacity Requirement has been satisfied.

$$Total\ Portfolio\ QCC \geq FS\ Capacity\ Requirement$$

Where:

The Participant's FS Capacity Requirement is its forecasted monthly demand multiplied by 100% plus the applicable Monthly FSPRM according to the following equation:

$$FS\ Capacity\ Requirement = Monthly\ P50 * (100\% + Monthly\ FSPRM)$$

The over and underperformance of VERs, forced outages, and Run-of-River hydro in the Participant's portfolio will be used to calculate performance changes in the Operations Program. The Participant's additional planned maintenance or short-term sales will be made from its excess Portfolio QCC.

The Participant's total demonstrated FS Transmission shall be at least equal to 75% of the Participant's FS Capacity Requirement at the FS Deadline. If the Participant's Total Portfolio QCC meets or exceeds that threshold, then the Participant's FS Transmission Requirement has been satisfied.

$$Demonstrated\ FS\ Transmission \geq FS\ Capacity\ Requirement * 75\%$$

Where:

Demonstrated FS Transmission is equal to the sum of all transmission demonstrated with completed paths and Approved Transmission Exceptions.

$$Demonstrated\ FS\ Transmission = \sum Trasnmission\ Demonstrated\ (completed\ paths) \mp Approved\ Transmission\ Exceptions$$

Appendix H – Demand Response Attestation

I, the undersigned, who, as [title], serves as a senior official of [Participant], hereby attest that for each Demand Response Qualifying Resource included in the accompanying FS Submittal, [Participant,] upon due investigation, has determined whether the demand response capability of such resource has been previously deployed to reduce load, and if such capability has been deployed to reduce load, Participant has, for purposes of developing the P50 Peak Load Forecast employed in such FS Submittal, added back to each historic hour when such capability was deployed the MWs of load reduction provided by such capability in such hour.

Appendix I – Storage Hydro Attestation

I, the undersigned, who, as [title], serves as a senior official of [Participant], hereby attest that I have reviewed [Participant]'s Storage Hydro Qualifying Capacity Contribution (QCC) provided this day by [Participant] to Western Power Pool (i.e., Program Administrator) ; and, to the best of my knowledge and belief following due inquiry appropriate to the reliability and resource adequacy matters addressed therein, that such QCC has been calculated in accordance with the methodology set forth in *BPM 105 Qualifying Resources* and such calculation meets all requirements of Tariff Section 16.2.5.5; that [Participant] has provided the Program Administrator with all information necessary to review such QCC that is stated in Tariff, Section 16.2.5.5, to the extent requested by the Program Administrator, and that all statements and information included in the FS Submittal with respect to the calculation of such QCC are true, correct and complete to the best of my knowledge and belief following due inquiry appropriate to the reliability and resource adequacy matters addressed therein.

Appendix J – Transmission Rights Attestation

I, the undersigned, who, as [title], serves as a senior official of [Participant], hereby attest that [Participant] has the transmission rights from [insert Qualifying Resources] Qualifying Resources to the load on [Participant's] system, but [Participant] is unable to provide transmission service reservation information.