



# WRAP

POWERED BY WPP

Program Review Committee

2026 Workplan

Board Approved

June 4, 2026

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## Executive Summary

Western Power Pool's (WPP) Western Resource Adequacy Program (WRAP) Tariff was approved by the Federal Energy Regulatory Commission (FERC) in February 2023. The WRAP's Program Review Committee (PRC) then worked with the Resource Adequacy Participant Committee (RAPC), Committee of State Representatives (COSR) and other interested stakeholders to draft Business Practice Manuals (BPMs) providing additional policy details and guidance on WRAP participation. Following the completion of all BPMs in September 2024, the online WRAP Change Request Portal opened in October 2024 for stakeholders to submit ideas for changes (known as Concepts) to the Tariff or BPMs via Change Request Forms (CRFs). Concepts are high-level ideas that need to be developed into full Proposals ready to go out for comment before being considered for approval by WPP's Board of Directors (Board). The final day for stakeholders to submit complete CRFs to be considered for the PRC's 2026 Workplan was December 31<sup>st</sup>, 2025. A compilation of CRFs submitted in 2025 can be found in Appendix A - Change Request Form Compilation.

This 2026 Workplan contains a schedule and plan of action for Task Forces to develop Concepts into Proposals. As part of the development of this Workplan the PRC prioritized the Concepts received in 2025 at a meeting in January 2026 (see Section 2), taking into account stakeholder input in support of the continued development of the WRAP. Following a level of effort review (see Section 3), WPP presented the PRC with potential Task Force schedules for the period July 2026 through June 2027.

Following a meeting of the Resource Adequacy Participant Committee (RAPC) on February 20<sup>th</sup>, 2026, feedback was provided to the PRC at its February 25<sup>th</sup>, 2026, meeting regarding how the prioritized Concepts may best be scheduled to provide Participants with the policy changes and clarification needed as WRAP approaches the Forward Showing (FS) Deadline of March 31<sup>st</sup>, 2027, for the first binding Season of Winter 2027-2028. This resulted in the PRC submitting draft Workplan III (see Figure 5) for public comment by March 15<sup>th</sup>, 2026, along with a plan of action that highlighted flexibility in response to special circumstances.

The PRC then had the opportunity to revise the draft 2026 Workplan as the Committee saw fit (see the response to comments in Section 5, which did not include any amendments to Workplan III) and distributed it to the Board and RAPC on May 15<sup>th</sup>. The Board considered and acted on the 2026 Workplan in public session at its next quarterly meeting June 4<sup>th</sup>, 2026, during which RAPC and other stakeholders had the opportunity to comment (see

Section 7). The Board approved the 2026 Workplan as presented, triggering implementation of the Task Force schedule.

# 1. Background

The Western Power Pool (WPP) Western Resource Adequacy Program (WRAP) Program Review Committee (PRC) is a multi-sector representative group charged with receiving, considering, and proposing design changes to the WRAP Tariff (Tariff) and Business Practice Manuals (BPMs). The PRC (or Committee) is the main clearing house for recommended design changes to the WRAP. These recommended changes may originate with WRAP Participants, the Committee of State Representatives (COSR), the Board of Directors (Board), other committees, stakeholders, or the public.

When a Concept (a suggested change to the Tariff and/or BPMs) is requested, the processes and criteria for review by the PRC are implemented as established in *BPM 301 PRC Workplan Development and Approval*.<sup>1</sup> Change Request Forms (CRFs) describing a Concept may be submitted at any point during a year through the online Change Request Portal.<sup>2</sup> The final day for stakeholders to submit complete CRFs to be considered for the PRC's 2026 Workplan was December 31<sup>st</sup>, 2025. This 2026 Workplan assigns and schedules Task Forces to develop prioritized Concepts into Proposals ready for comment. WPP, as Program Administrator, compiled the completed CRFs submitted in 2025 to facilitate the PRC's development of this Workplan (see Appendix A - Change Request Form Compilation).

The PRC was required to prioritize the Concepts submitted in 2025 by February 1<sup>st</sup>, 2026, using a PRC-determined method and criteria. The prioritization exercise took place in Portland, Oregon, on January 28<sup>th</sup>, 2026 (see Section 2). By February 15<sup>th</sup>, 2026, it was required that the PRC be provided with a level of effort review, proposing potential schedules for Task Forces to develop the prioritized Concepts into Proposals ready for comment (see Section 3). A single proposed schedule was decided upon along with a plan of action that would allow the PRC to be responsive to special circumstances and flexible with regards to implementation (see Section 4).

A draft of this 2026 Workplan was made available for stakeholder review between March 15<sup>th</sup> and April 15<sup>th</sup>, 2026. WPP compiled all comments received for the PRC to consider and revise the draft Workplan as the committee saw fit by May 15<sup>th</sup>, 2026 (Section 5). The revised draft Workplan and a summary of comments received was distributed to the Board and the Resource Adequacy Participant Committee (RAPC) and made available publicly on May 15<sup>th</sup>.

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<sup>1</sup> All WRAP BPMs can be found at: [https://www.westernpowerpool.org/resources/wrap\\_bpms/](https://www.westernpowerpool.org/resources/wrap_bpms/)

<sup>2</sup> WRAP Change Request Portal: [https://www.westernpowerpool.org/comments/change\\_requests/western-resource-adequacy-program](https://www.westernpowerpool.org/comments/change_requests/western-resource-adequacy-program)

The Board considered and acted on the Workplan in public session at its next quarterly Board meeting (June 4th, 2026), during which RAPC and other stakeholders had the opportunity to express any opinions (see Section 7). The final Workplan approved by the Board identified Concepts to be developed into full Proposals by Task Forces that will then be distributed for comment and potential adoption per *BPM 302 Proposal Development and Consideration*.

## 2. PRC Prioritization Exercise

The compiled list of concepts (CRF Compilation) was circulated to the PRC on January 13<sup>th</sup>, 2026, for further consideration at its meeting on January 28<sup>th</sup>, 2026 (see Appendix A - Change Request Form Compilation). Twelve CRFs eligible for the 2026 Workplan were submitted in 2025. Through consolidation of the following similar ideas the number of Concepts in the prioritization exercise was reduced to nine:

- 2025-CRF-07 (WRAP E-Tags [1]) and 2025-CRF-11 (WRAP E-Tags [2])
- 2025-CRF-09 (Regional Transmission) and 2025-CRF-10 (Transmission for Capacity); and
- 2025-CRF-014 (Large Load Exclusion) and 2025-CRF-019 (Data Center Loads).

As part of the CRF Compilation, and at the direction of the PRC, WPP undertook a high-level level of effort review with the aim of assisting the committee in its next steps in Workplan Development: Concept prioritization. As part of this high-level level of effort review each Concept was tagged according to the impacted Wrap Area and given an estimated Time Score. For the 2026 Workplan the Concepts were categorized according to the following WRAP Areas: Forward Showing (FS) Capacity Requirement, FS Transmission Requirement, FS Demonstration, Resource Accreditation, and Operations Program. The Time Score was an estimate of approximately how many months a potential Task Force would take to develop a Concept into a Proposal ready for comment: Short/S (two months), Medium/M (four months), Long/L (six months).

In terms of guidance for reviewing Concepts, Section 3.4.2 of the Tariff states that, “[t]he PRC shall establish a process and criteria for receiving and reviewing proposed amendments to this Tariff and the Business Practice Manuals. Such review will include procedures for stakeholder comment.” BPM 301 then provides further details on Concept prioritization and the stakeholder comment process:

The PRC will prioritize Concepts received in the compiled list according to a PRC-determined method involving established criteria. The PRC will aim to reach agreement on prioritization via consensus, however, given a situation where consensus is not

achieved, the PRC will vote on a prioritized slate of Concepts. This prioritization process will be complete by February 1.<sup>3</sup>

Concept prioritization criteria were proposed originally to the PRC at the Committee’s meeting on December 18<sup>th</sup>, 2024. The prioritization method sought to divide Concepts into higher and lower priority, then rank the Concepts within those categories, leading to a fully prioritized list of Concepts. The PRC agreed to move forward with the proposed process without having a formal vote, allowing for future flexibility (see Appendix B – PRC Minutes Dec. 18<sup>th</sup>, 2024; 9-10am PPT). For the nine consolidated Concepts eligible for the 2026 Workplan the PRC agreed to a prioritization process was narrowed down to a simple ranking exercise.

The PRC held a meeting to formally prioritize Concepts for the 2026 Workplan on January 28<sup>th</sup>, 2026 (see Appendix C – PRC Minutes Jan. 28<sup>th</sup>, 2026; 12-4pm ). The results of the ranking exercise are shown in Figure 1.

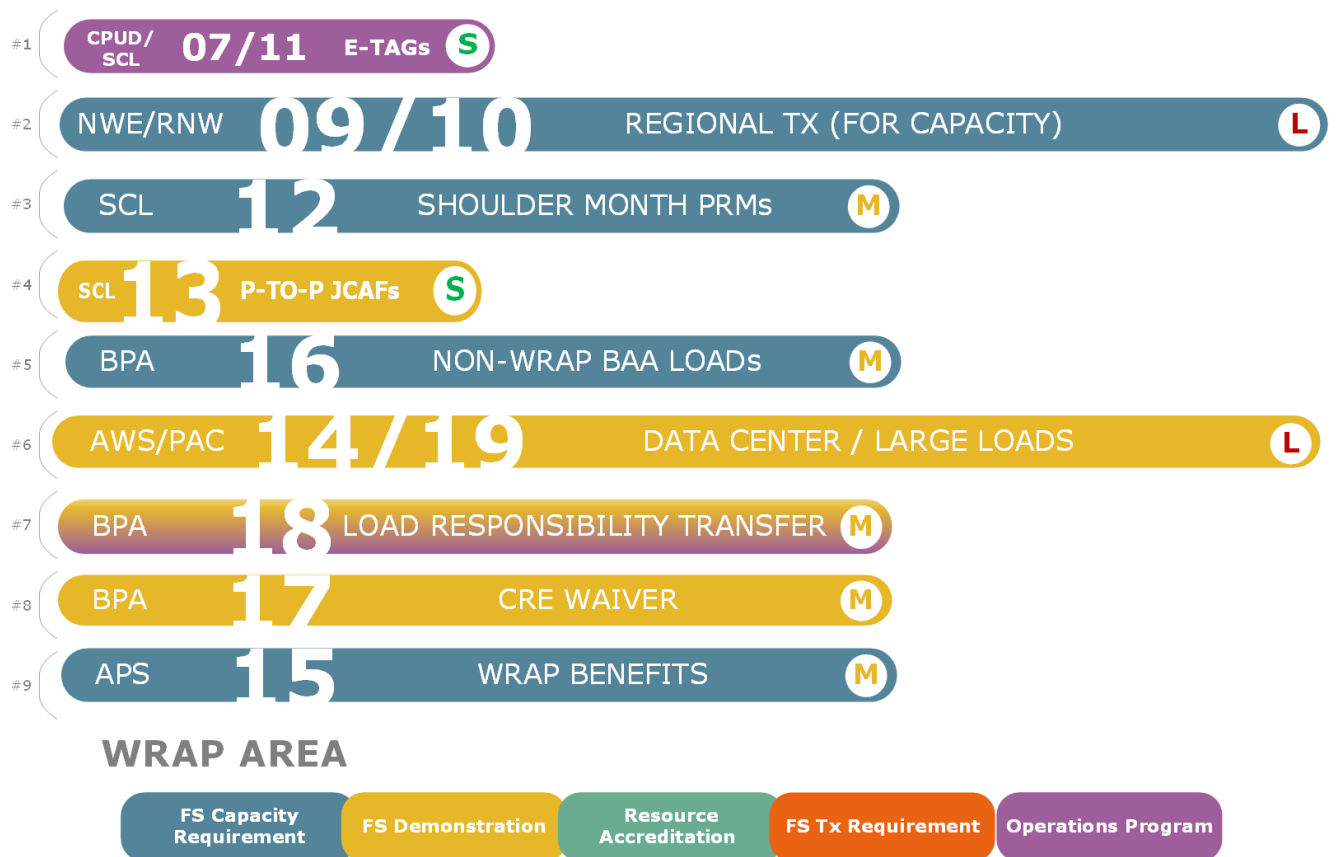


Figure 1- Results of PRC Prioritization Exercise

<sup>3</sup> BPM 301 §3.4 pp 7-8

Regarding Concepts that could potentially be included in the PRC’s 2026 Workplan, WPP estimated it was feasible for two Task Force streams to run simultaneously for the 12-month period July 2026 through June 2027. Taking into account the Time Score assigned to each Concept – Short/S (two months), Medium/M (four months), Long/L (six months) - this would allow the top six Concepts to be fully captured by the 2026 Workplan (i.e. 2025-CRF-07/11 through 2025-CRF-14/19 in Figure 1).

The PRC then motioned to move forward with the prioritized list of Concepts as determined at the January 28<sup>th</sup>, 2026, meeting with direction to WPP to specifically consider two draft schedules during the detailed level of effort review (Section 3): one in alignment with the results of the prioritization exercise and another that prioritized 2025-CRF-13 (Participant-to Participant JCAFs) and 2026-CRF-16 (Non-WRAP BAA Loads) over 2025-CRF-09/10 (Regional Transmission for Capacity) given that the two former Concepts were deemed to have potentially more readily deliverable solutions.

### 3. Detailed Level of Effort Review

BPM 301 states that following the prioritization of Concepts:

“[...] the Program Administrator will work with the Program Operator to give each Concept in the list a level of effort ranking. This level of effort ranking will include a description of the requirements for addressing each Concept (Program Administrator and Program Operator support, Participant engagement, etc.) as well as the anticipated timeline. The PRC will be supplied with the criteria used to determine the level of effort ranking. The level of effort review will be completed by February 15.”

The detailed level of effort review (to distinguish the process from the high-level level of effort review conducted as part of the CRF Compilation) was presented to on February 11th, 2026 (see Appendix D – PRC Minutes Feb. 11th, 2026; 8:30-10am PPT) where the PRC recognized WPP staff bandwidth constraints and the interactions between the 2025 and 2026 Workplan schedules.

WPP began the level of effort review with a draft Schedule I that took the prioritized Concepts and scheduled them into two Task Force streams in the order the Concepts were ranked (Figure 2).



Figure 2 - Level of Effort Review Draft Task Force Schedule I

WPP then explored re-arranging the schedule according to the direction given at the January 28<sup>th</sup>, 2026, meeting, prioritizing 2025-CRF-13 (Participant-to Participant JCAFs) and 2026-CRF-16 (Non-WRAP BAA Loads) over 2025-CRF-09/10 (Regional Transmission for Capacity) as shown in Schedule II (see Figure 3).

# 2026

July	August	September	October	November	December
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# 2027

January	February	March	April	May	June
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## WRAP AREA



Figure 3 - Level of Effort Review Draft Task Force Schedule II

WPP developed an additional potential schedule during the Level of Effort Review that took Schedule I and brought up 2025-CRF-013 (Participant-to Participant JCAFs) while keeping 2025-CRF-09/10 (Regional Transmission for Capacity) in place due to its high priority (see Schedule IA in Figure 4,). Similar to the 2025 Workplan this would lead to a Task Force stream dedicated to Short/Medium Concepts and a stream dedicated to Long Concepts. Furthermore, as with Schedule II this would front-load shorter Concepts with the aim of increasing the chance of implementing the associated changes ahead of the first Binding Winter 2027-2028 Forward Showing. Schedule IA also proposed merging 2025-CRF-07/11 (WRAP E-Tags) with the ongoing 2024-CRF-01 (Day Ahead Market Optimization) from the 2025 Workplan, given the complimentary themes.

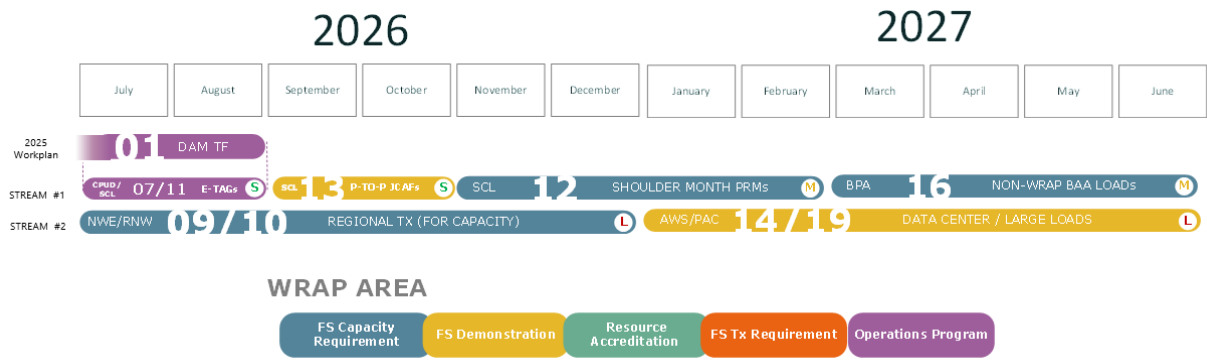


Figure 4 - Level of Effort Review Draft Task Force Schedule IA

Following a meeting of the RAPC on February 20<sup>th</sup>, 2026, feedback was provided to the PRC at its February 25<sup>th</sup>, 2026, meeting regarding how the prioritized Concepts may best be scheduled to provide Participants with the policy changes and clarification needed as WRAP approaches the Forward Showing (FS) Deadline on March 31<sup>st</sup>, 2027, for the first binding Season of Winter 2027-2028 (see Appendix E – PRC Minutes Feb. 25th, 2026; 8:30-10am PPT) . This resulted in Schedule III, which takes into account the 2025 Workplan schedule and other WRAP workstreams, as show in Figure 5.

Draft Task Force Schedule III still has only two simultaneous PRC work streams dedicated to Task Forces. Task Force Stream #1 begins by noting at the time of workplan development the Demand Response (DR) Qualifying Capacity Contribution (QCC) Task Force is still underway, aiming to have a Proposal ready for PRC consideration by the end of March 2026. There is then a buffer before the next Task Force on Data Center / Large Loads (a Concept the RAPC indicated they sought clarity on before the March 31<sup>st</sup> FS Deadline) to allow for the Day-Ahead Market (DAM) Optimization Task Force to be re-stood up (after a temporary hold later 2025 to allow for WPP-Participant discussions). The DAM Task Force would be consolidated with the WRAP E-Tags Concept (as in Schedule IA). Following an additional buffer, Task Force Stream #1 would tackle the Regional Transmission (for Capacity) Concept after the March 31<sup>st</sup> FS Deadline; however, it was envisioned that a dedicated Workgroup could be set up earlier (approximately Q3 2026) for about a month to develop a policy white paper, providing early indicative policy direction while leaving the technical details to the later Task Force. At the end of both Task Force Streams #1 and #2 are smaller Concepts from the 2025 Workplan (Capability Testing Off-Season along with Joint Owner Flexibility) that may be resolved by that point, but have future time reserved for their resolution just in case.

Task Force Stream #2 has the ELCC by Vintage / Indicative QCC Task Force underway at the time of workplan development, extending into the initial month(s) of the traditional 2026 Workplan timeline. Following a buffer for the completion of other WRAP projects,

Stream #2 will then address the 2025 Workplan Concept of Load Growth Factor, which was deemed by the RAPC to be important but secondary to resolving Data Center / Large Loads policies ahead of the March 31<sup>st</sup> FS Deadline. This would be followed by development of the Non-WRAP BAA Loads Concept.

In addition, the Participant-to-Participant (P-to-P) Joint Capacity Accreditation Form (JCAF) Concept was thought to be sufficiently straightforward as to be a Non-Task Force Proposal (NTFP) rather than requiring a full Task Force to develop into a Proposal for comment. Finally, the work on development of an Expedited Proposal on FS Deficiency Charge Deferrals would be consolidated with the Shoulder Month PRMs Concept, given the significant overlap in substance.

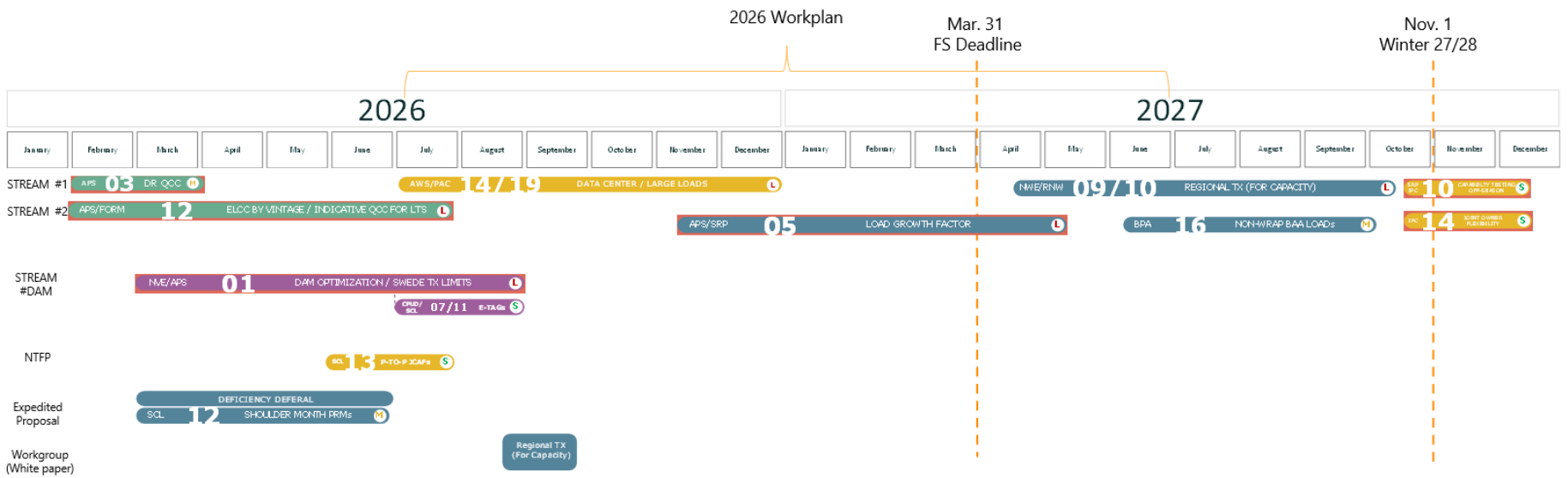


Figure 5 - Level of Effort Review Draft Task Force Schedule III (Concepts with a red border are currently part of the 2025 PRC Workplan)

## 4. Proposed Schedule and Plan of Action

The PRC's proposed schedule is Workplan III (see Figure 5), informed by Participant priorities ahead of the March 31<sup>st</sup>, 2026, FS Deadline for the first Binding Season of Winter 2027-208. The PRC also sought to include the same flexibility it outlined in the 2025 Workplan. Such flexibility means that while Concept Prioritization should remain the foundation of the Workplan, the PRC should retain flexibility to address special circumstances, such as changes in priorities (including withdrawal of a Concept) and staffing shifts at WPP, SPP, or in Task Force leadership. Additionally, as was experienced during implementation of the 2025 Workplan, Task Force may take longer (or potentially shorter) than anticipated to develop a Concept into a Proposal, so the PRC needs to execute its discretion on adapting the schedule to special circumstances to accommodate contemporary needs.

Per BPM 301 Table 1, the Lead Sponsor is responsible for a Concept up until December 31<sup>st</sup> of the year before the Workplan, which is the final day to submit a complete Change Request Form. As described in BPM 302, the Lead Sponsor will participate as a member of any Task Force set up to develop the Concept, but it is up to the Task Force as a whole to decide its own procedures pertaining to decision making processes, including leadership structure. If the Task Force decides it is unnecessary to develop a Concept any further, the Task Force will make such a Proposal directly to the PRC, and the Committee will consider endorsing withdrawal of the Concept via consensus or voting.

## 5. Changes in Response to Comments

A draft of this 2026 Workplan was made available for stakeholder comment from March 15<sup>th</sup> through April 15<sup>th</sup>, 2026. Appendix F – 2026 Workplan Stakeholder Review Comments includes all eight sets of comments received by the PRC. In response to those comments, the PRC added the following clarification regarding implementation of the Regional Transmission Task Force (scheduled to begin Q2 2027) and the dedicated Regional Transmission Workgroup (scheduled to begin Q3 2026).

With regard to the proposed schedule outlined in Figure 5, Section 3 of this Workplan describes how the Regional Transmission Workgroup would develop a white paper providing early indicative policy direction while leaving technical details to the subsequent Regional Transmission Task Force. In addition to the flexibility to reschedule task forces described in Section 4 of this Workplan (potentially allowing for the work of developing a Concept into a Proposal to begin earlier) the PRC observes that the Regional Transmission

Workgroup deliverables could also lead to the development of a Proposal by the Regional Transmission Task Force on a shorter timeline than anticipated.

In addition, the PRC requests that the Regional Transmission Workgroup consider planning modeling (possibly within the 2026 Advance Assessment LOLE modeling for Summer 2028 and Winter 2028-2029) to quantify the potential of the North Plains Connector (NPC) regional transmission project to provide diversity benefits that could reduce PRMs for all Participants (or those within the affected Subregion) as well as the potential effects of NPC as a resource contributing QCC towards the Forward Showing Capacity Requirements of specific Participants.

## 6. Next Steps

The PRC distributed this Workplan to the WPP Board and RAPC on May 15<sup>th</sup>, 2026. The Board will consider and act on the 2026 Workplan in public session no later than its next quarterly meeting on June 4<sup>th</sup>, 2026, during which RAPC and other stakeholders will have the opportunity to comment (see Section 7). Board approval of the 2026 Workplan will trigger implementation of the Task Force schedule, launching the process of developing prioritized Concepts into Proposals ready for stakeholder comment before consideration by the Board.

## 7. Board Consideration

The Board approved the 2026 Workplan as presented (see **Error! Reference source not found.6**), triggering implementation of the Task Force schedule (see Figure 5) and launching the process of developing prioritized Concepts into Proposals ready for stakeholder comment before consideration by the Board.



# WRAP

POWERED BY WPP

Program Review Committee

2026 Workplan Development

Appendix A - Change Request Form Compilation

January 2026

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## Introduction

The Western Power Pool (WPP) Western Resource Adequacy Program (WRAP) Program Review Committee (PRC) is a multi-sector representative group charged with receiving, considering, and proposing design changes to the WRAP Tariff (“Tariff”) and Business Practice Manuals (BPMs). The PRC is the clearing house for recommended design changes to the WRAP. These recommended changes could come from WRAP Participants, the Committee of State Representatives (COSR), the Board of Directors (Board), other committees, stakeholders, or the public.

When a Concept (a suggested change to the Tariff and/or BPMs) is requested by a stakeholder, the processes and criteria for review by the PRC are utilized as established in *BPM 301 PRC Workplan Development and Approval* and *BPM 302 Proposal Development and Consideration*. Change Request Forms (CRFs) describing a Concept are submitted at any point during a year. The final day for stakeholders to submit complete CRFs for this second change control process cycle was December 31<sup>st</sup>, 2025. WPP as Program Administrator has compiled all completed CRFs submitted in 2025 in this document to facilitate the PRC’s development of a Workplan (a plan of action that identifies Concepts for development into Proposals) for 2026. The PRC will prioritize Concepts by February 1<sup>st</sup>, 2026, using a PRC-determined method involving established criteria. The completed Workplan approved by the Board in June will identify Concepts to be developed into full Proposals by Task Forces. These Proposals will then be distributed for comment.

Blue text in the CRF indicates language added by the Program Administrator to identify the Concept and facilitate the PRC’s prioritization exercise. At the top of each CRF is its number and sponsoring organization followed by a keywords identifier. Below that is the WRAP Area the Concept would impact primarily (Forward Showing [FS] Capacity Requirement, Resource Accreditation, FS Transmission Requirement, FS Demonstration, or Operations Program), an indication of whether a Tariff change would likely be necessary, and a Time Score reflecting the Program Administrator’s estimate of how long it would take a Task Force to develop the Concept into a Proposal ready for comment. The remainder of each table is the CRF as submitted by the Lead Sponsor, except for where relevant Tariff or BPM language has been added in blue. Please note this compilation begins with 2025-CRF-007 as the previous CRFs submitted in 2025 were either Non-Task Force Proposals (NTFPs) or withdrawn.

## 2025-CRF-007 / CHELAN / WRAP E-Tags (1)

**WRAP Area:**

Operations Program

**Tarriff Change:**

No

**Time Score:**

Short

**Lead Sponsor:** Kerwin Loukusa

Kerwin.Loukusa@chelanpud.org

**Co-Sponsor:****Summary:** Add WRAP identifier to tagging requirement to BPM 205**Description of the issue:** There currently is no programmatic way to identify etags used to deliver energy through the WRAP program during a sharing event.

This effects to areas.

1. Program participants are required to submit an After The Fact Energy Deployment (ATFED) file within 168 hours of energy delivery. To ensure reliability and accuracy of the submittal of information Chelan County PUD would like to automate the process of aggregating the data that underlies this file, which would require the programmatic aggregation of etag information.
2. Chelan County PUD would like to automate both the creation, approval and denial of etags related to WRAP activities through its automated services, but currently cannot programmatically identify WRAP etag with certainty.

**Proposed solution to the issue described:** Chelan County Proposes to use the (token:value) pair inside the MISC info area within the physical path definition to distinguish WRAP etags.

Possible Combinations (token:value):

WRAP:ENERGY

WRAP:DLVRY

WRAP:HOLDBACK

**Specific document and language you would like changed:**

Once the specific changes have been identified and approved, the BPM 205 document section 3.1 should be updated with additional requirements.

**Suggestion for how language could be updated to address issue:****Proposed Change:** "Program participants are required to enter a MISC info (token:value) pair of the following information into the physical path section of the etag [WRAP:ENERGY]".**Describe the benefits that will be realized from this change:**

Program participants will be able to programmatically identify WRAP related etags for approval/denial and after the fact aggregation into datasets required in the AFTED file.

**Any data/information that would characterize the importance of the issue:**

-

## 2025-CRF-009 / NWE / Regional Transmission

<b>WRAP Area:</b> FS Capacity Requirement	<b>Tarriff Change:</b> Yes	<b>Time Score:</b> Long
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<b>Lead Sponsor:</b> Quinn McCarthy quinn.mccarthy@northwestern.com	<b>Co-Sponsor:</b>
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**Summary:** Regional Electric Transmission Modeling & PRM Impacts

**Description of the issue:** NorthWestern Energy and others, including other WRAP members, are exploring the opportunity to invest in Grid United’s proposed North Plains Connector (NPC) 3,000 MW regional electric transmission project. The NPC Project would connect the Pacific Northwest MID-C market with the MISO RTO and SPP RTO. The estimated NPC Project commercial operations date is in 2032. NorthWestern would like to understand how the NPC Project would impact PRM requirements in the WRAP.

**Proposed solution to the issue described:** NorthWestern proposes that a task force be formed to consider how NPC and possibly other interregional transmission can be modeled and considered by WRAP. The scope would include consideration of modeling assumptions of non-firm imports on NPC and/or other lines and/or similar assessments or modeling treatment.

**Specific document and language you would like changed:**

-

**Suggestion for how language could be updated to address issue:**

-

**Describe the benefits that will be realized from this change:**

Additional regional transmission interchange into the WRAP footprint is beneficial to all WRAP participants in that:

- 1) It can facilitate capacity transfers that would otherwise not exist.
- 2) New interregional transmission may likely result in lower PRMs in a WRAP region because new interchange import capacity will allow a LRZ to utilize capacity outside the LRZ. For example, WRAP members benefit from the CAISO capacity that is imported during CCH into the WRAP footprint, which results in lower PRMs than would otherwise be possible. Likewise, WRAP members may very well benefit from SPP RTO and MISO RTO capacity that could be imported into the WRAP footprint during CCH using the NPC Project transmission capacity.

**Any data/information that would characterize the importance of the issue:**

If even a small reduction in a region’s PRMs can be made, due to new interchange capacity made available from a regional transmission project, that change can result in material capacity compliance savings for the region.

50,000 Estimated WRAP Northwest Subregion Peak MW Load

X 1.00% Potential PRM Savings from NPC Project Interchange

= 500 MW PRM Savings

X 1,000 Conversion to kW

= 500,000 kW PRM Savings

X \$91.810 WRAP CONE per kW-Yr. (from 2022)

= \$45,905,000 Estimated Annual CONE Savings from Lower PRM Resulting from NPC Project Capacity

## 2025-CRF-010 / RNW-IEA-GL / Transmission for Capacity

<b>WRAP Area:</b> FS Capacity Requirement	<b>Tarriff Change:</b> Yes	<b>Time Score:</b> Long
<b>Lead Sponsor:</b> Kyle Unruh kyle@renewablenw.org		<b>Co-Sponsor:</b> Casey Baker, casey@gridlab.org  Ben Fitch-Fleischmann, ben@interwest.org
<b>Summary:</b> Transmission Lines for Capacity, Resource Adequacy		
<b>Description of the issue:</b> As currently designed, the WRAP program only values transmission insofar as it enables deliverability of Qualifying Resources to satisfy the FS Capacity Requirement as described in the FS Transmission Requirement (BPM 108, 3.1.4). Qualifying Resources sufficient for inclusion in the FS Capacity Requirements so far only include assets traditionally classified or treated as generators (e.g. hydro, wind, solar, gas, coal, storage, DR, BTM; BPM 105). We find certain transmission lines provide substantially equivalent, quantifiable capacity benefits for purposes of WRAP in virtue of participants’ access to the load and resource diversity enabled by these transmission lines.		
<b>Proposed solution to the issue described:</b> Allow for the inclusion of certain transmission lines as a qualifying resource to be attributed capacity value sufficient for inclusion in participant(s) FS Capacity Requirement.		
<b>Specific document and language you would like changed:</b> We defer to the WRAP on what BPM or tariff changes are necessary to affect this change, though we reference certain BPM sections in our cover letter.		
<b>Suggestion for how language could be updated to address issue:</b> Any language which would allow for inclusion of certain transmission lines as a qualifying resource, as described above and in the attached, would be adequate.		
<b>Describe the benefits that will be realized from this change:</b> Appropriately attributing a resource adequacy value to certain transmission lines themselves more accurately reflects utilities’ utilization of the transmission system, the value of transmission to the region, the realities of real-world operations, and utility resource modeling best practice.		
<b>Any data/information that would characterize the importance of the issue:</b> <a href="#">Cover letter:</a>		

WRAP Participants and Program Staff,

The undersigned organizations are highly supportive of and impressed by the strides WRAP has made in developing a regional view of resource adequacy and allowing its participants to more efficiently maintain reliable service for their customers. Having participated in the program's development, both directly and indirectly, we appreciate the scale and significance of WRAP and remain committed to supporting its full development into operations. Our organizations submit this request in light of what we see as a gap in the program which, when resolved, will more accurately value the resource adequacy contributions of transmission infrastructure consistent with the value it provides.

We request the WRAP launch a task force to adapt its Business Practice Manuals and/or Tariff language to attribute capacity value to certain transmission lines themselves, sufficient to qualify as a resource and receive credit in the FS Capacity Requirements. As currently designed, the WRAP program only values transmission insofar as it enables deliverability of Qualifying Resources to satisfy the FS Capacity Requirement as described in the FS Transmission Requirement (BPM 108, 3.1.4). Qualifying Resources sufficient for inclusion in the FS Capacity Requirements so far only include assets traditionally classified or treated as generators (e.g. hydro, wind, solar, gas, coal, storage, DR, BTM; BPM 105). We find certain transmission lines provide substantially equivalent, quantifiable capacity benefits for purposes of WRAP in virtue of participants' access to the load and resource diversity enabled by these transmission lines. We and our colleagues have thoroughly demonstrated this attribute of transmission lines, particularly those which cross multiple jurisdictions, in the linked materials attached below. Furthermore, certain utilities, such as Idaho Power, have included transmission's resource adequacy value in resource planning as a utility best practice.

We acknowledge consideration of transmission's capacity value in this way may introduce new challenges to WRAP's assessment of resource adequacy (i.e. WRAP may need to account for certain regional/subregional transmission constraints not currently modeled). Despite such challenges, we believe appropriately attributing a resource adequacy value to certain transmission lines themselves more accurately reflects utilities' utilization of the transmission system, the value of transmission to the region, the realities of real-world operations, and utility resource modeling best practice.

Sincerely,

GridLab /s/ Casey Baker  
Renewable Northwest /s/ Kyle Unruh  
Interwest Energy Alliance /s/ Ben Fitch-Fleischmann

Attached:

Astrape Consulting (May 2024): [North Plains Connector \(NPC\) Evaluation](#)

Telos Energy (April 2025): [Transmission as a Capacity Resource](#)

Grid Strategies (June 2025): [Resource Adequacy Value of Interregional Transmission](#)

## 2025-CRF-011 / SCL / WRAP E-Tags (2)

**WRAP Area:**

Operations Program

**Tarriff Change:**

No

**Time Score:**

Short

**Lead Sponsor:** Mara Kontos

Mara.kontos@seattle.gov

**Co-Sponsor:****Summary:** WRAP Tag Contract and MISC Info Identifier on e-Tags designated for WRAP**Description of the issue:**

WRAP related energy transfers are not currently identified on e-Tags using a standardized contract type or miscellaneous token/value. As a result, WRAP transactions may be operationally indistinguishable from bilateral or market-based energy schedules.

This lack of clear identification reduces real-time operational visibility for Balancing Authorities (BA), Reliability Coordinators (RC) and real time 24/7 trading desks, and increases reliance on manual interpretation, particularly during system stress events. It also creates challenges for emerging organized markets, such as EDAM and Markets+, which can rely on structured e-tag attributes to validate, and process scheduled energy e-Tags.

**Proposed solution to the issue described:**

Establish a WRAP specific e-Tag identifier through either:

- A distinct contract type
- A standardized miscellaneous token/value indicating a WRAP transaction.

This identifier would be applied consistently across all WRAP participants and used exclusively for WRAP related energy transfers, similar to the existing identification approach used for NWPP Sharing Reserves transactions.

For Example:

Contract = "NWPP RS" (Suggestion: "WRAP RS")

MISC Token Info = WECC\_Reserve\_Responsible\_Entity = "SCL"

MISC Token Info = WECC\_Reserve\_Responsible\_Entity\_Type = "BA"

Uploaded e-Tag for example.

View Tag 0001220 - Work - Microsoft Edge  
 https://www.sclm.oati.com/webtrader\_sclm/sys-framework-newWindow.wml?NoPageWrapper=0&NoTitleBar=0&UrlToOpen=https%3A%2F%2Fwww.sclm.oati.com%2Fcgj-i

SCL\_WPP0001220\_GRID Start/Stop Time: Oct 14, 2025 03:00 - Oct 14, 2025 04:00 PST (All times are in PST)

**Tag Information**

GCA	CPSE	Tag Code	LCA	Transaction Type	Time Zone	Test Tag	Tag MWh at Gen (Original/Final)	Tag MWh at Load (Original/Final)
SCL	WPP	0001220	GRID	Normal	PST	No	4 / 4	4 / 4

PSE Comment: NWPP RS  
 Multiple Base Profile: No

**Market Path**

PSE	Product	Contract	Misc Info	Misc Info	Token	Value
SCLMM1	G-F	NWPP RS	Yes			
BPAT			No		WECC_Reserve_Responsible_Entity	SCL
CALPWE	L		No		WECC_Reserve_Resp_Entity_Type	BA

**Physical Path**

BA	TSP	MO	PSE	POR	POD	Sched Entities	Contract	Misc Info	Loss
SCL			SCLMM1	Source: SCL				No	
	BPAT		BPAT	BPAT.SCL	HermistonCPN	BPAT		No	
			CALPWE	Sink: HERMISTONCPN				No	

**Current Energy and Transmission Profiles - MW (out of)**

MW  Trans Total  Reservation  Blank/Zero

Date	Start	Stop	Gen		BPAT		Ramp Duration	
			MW	Trans	NWPP_RES-PPR	MW	Start	Stop
10/14	03:00	04:00	4	4	4	4	0	0
			MW:	4	4	4	4	

**Transmission Allocation**

TSP	Owner	Product	OASIS	NITS Resource	Misc Info
BPAT	BPAT	7-F	NWPP_RES-PPR		No

**Specific document and language you would like changed:**

No specific language that City Light can point to change currently but would suggest any applicable WPP documents that include WRAP implementation guidance and any WPP e-Tagging or scheduling documentation (WRAP Operational documentation) that defines required or recommended tagging attributes for program-related transactions.

**Suggestion for how language could be updated to address issue:**

City Light would suggest adding language requiring that all WRAP-related energy transfers be identified on e-Tags using a WRAP specific contract type and/or a standardized miscellaneous token/value, clearly indicating the transaction as a WRAP obligation.

The language should specify that this identifier is required for all WRAP transactions and is intended to provide clear operational visibility, support consistent treatment by BA and RC, and enable proper recognition by organized markets such as EDAM and Markets+.

**Describe the benefits that will be realized from this change:**

Implementing a WRAP specific e-Tag identifier will improve operational clarity and consistency across the Western Interconnection. Balancing Authorities and Reliability Coordinators will be able to quickly and reliably identify WRAP related energy transfers and distinguish them from bilateral or markets-based schedules. This would reduce reliance on manual interpretation during real-time operations and system stress events.

This change will also support integration with organized markets such as EDAM and Markets+. Clear identification of WRAP transactions will allow markets systems to properly recognize and process WRAP energy, reducing the risk of misclassification, settlement errors, or unintended overlap with market-clearing energy.

In addition, standardized tagging will improve transparency for compliance monitoring, post-event review, and audit purposes, supporting consistent treatment of WRAP obligations as the program continues to mature.

**Any data/information that would characterize the importance of the issue:**

WRAP transactions are expected to occur primarily during periods of system stress, when operational clarity is most critical. During these events, operators rely on standardized e-Tag attributes to quickly understand the purpose of schedule energy transfers.

Unlike NWPP Sharing Reserves transactions, which are clearly identified through a defined contract type and miscellaneous token/value, WRAP e-Tags currently lack a comparable standardized identifier. As WRAP obligations increase under a binding program structure and organized markets such as EDAM and Markets + are implemented, the absence of clear WRAP identification increase the risk of misclassification or inconsistent treatment of WRAP energy schedules.

Although WRAP transactions may be infrequent under normal conditions, their importance is high given their role in maintaining system reliability during extreme events.

## 2025-CRF-012 / SCL / Shoulder Month PRMs

**WRAP Area:**

FS Capacity Requirement

**Tarriff Change:**

Yes

**Time Score:**

Medium

**Lead Sponsor:** Mara Kontos

Mara.kontos@seattle.gov

**Co-Sponsor:****Summary:** WRAP Exception Proposal for Shoulder Month PRM Volatility**Description of the issue:**

Under the current WRAP framework, Planning Reserve Margin (PRM) values in shoulder months may be materially higher than those associated with a Participant's historically observed seasonal peak load conditions. In certain cases, this results in FS Capacity Requirements that significantly exceed a Participant's actual historical peak load for the corresponding season.

Because shoulder months do not consistently coincide with periods of highest reliability risk, elevated PRM values in these months may produce deficiency charges that are disproportionate to a participant's true capacity shortfall risk, even when sufficient resources exist to serve historically observed seasonal peak load.

**Proposed solution to the issue described:**

Establish a limited WRAP exception that allows relief from deficiency charges in designated shoulder months when PRM-driven FS Capacity Requirements materially exceed a Participant's historical seasonal peak load.

The exception would be available once per season (Summer or Winter) and applicable to one designated shoulder month per year, subject to defined trigger conditions and verification requirements.

**Specific document and language you would like changed:**

Applicable documents include the WRAP Tariff and any associated WRAP implementation, compliance, or deficiency charge provisions that define FS Capacity Requirements and the assessment of deficiency charges for shoulder months.

And any other documentation that the PRM task force might be currently developing may need specific language added or changed to include this exception.

**Suggestion for how language could be updated to address issue:**

Add an exception provision allowing a Participant to request full or partial relief from the WRAP Deficiency Charge for a designated shoulder month if the calculated FS Capacity Requirement exceeds the Participant's historically observed seasonal peak load by 12%-18%

The language should specify:

- Recognized shoulder months (Summer: June, September; Winter: November, March)
- Eligibility limited to one shoulder month per season
- Verification requirements for historical load and PRM data
- Limitations preventing carryover of relief or application where PRM exposure is already mitigated through existing commitments.

**Describe the benefits that will be realized from this change:**

This change would provide a narrowly defined mechanism to address anomalous Planning Reserve Margin outcomes in shoulder months while preserving WRAP's core reliability objectives. By allowing limited relief where FS Capacity Requirements materially exceed a Participant's historical seasonal peak load, the proposal reduces the risk of disproportionate deficiency charges that are driven by PRM volatility rather than actual capacity shortfall risk.

The exception improves fairness and predictability for participants, supports continued engagement in the program, and enhances confidence that deficiency charges are aligned with real reliability needs. At the same time, the proposed limitations and verification requirements ensure the exception is applied only in well-defined circumstances and does not weaken overall compliance incentives.

**Any data/information that would characterize the importance of the issue:**

Recent WRAP Forward Showings have demonstrated that PRM values in certain shoulder months can be materially higher than those observed during historically higher risk seasonal peak load periods. In these cases, FS Capacity Requirements may exceed a Participant's historical seasonal peak load by a meaningful margin, despite no corresponding increase in actual system or load risk.

Although shoulder-month deficiencies may occur infrequently, the financial and policy impacts can be significant when they do occur. Providing a limited exception for these circumstances recognizes the outsized effect of PRM volatility in shoulder months and helps ensure deficiency charges remain proportional to actual reliability risk.

## 2025-CRF-013 / SCL / Inter-Participant JCAFs

**WRAP Area:**

FS Demonstration

**Tarriff Change:**

No

**Time Score:**

Short

**Lead Sponsor:** Mara Kontos

Mara.kontos@seattle.gov

**Co-Sponsor:****Summary:** Eliminate the need for signature on a JCAF between a WRAP Participant and a WRAP Participant**Description of the issue:**

Under the current WRAP Business Practice requirements, certain qualifying contracts require a completed and executed Joint Contract Accreditation Form (JCAF) with signatures from both counterparties. This requirement applies even when both counterparties are WRAP Participants and the Qualifying Capacity Contribution (QCC) is directly verified and mutually agreed upon within the EDST Forward Showing (FS) portal.

For Participant-to-Participant transactions, the JCAF signature requirement duplicates existing verification controls. Both WRAP Participants must independently review and agree to the QCC values in EDST, and each participant is already required to certify all FS inputs through a senior executive attestation as part of the Forward Showing process. As a result, the additional requirement to route JCAF's for signature is labor-intensive, time-consuming, and operationally redundant with too many areas for manual error making the form ultimately deficient in the eyes of WRAP if not correct.

This redundancy has become a material compliance issue. The WRAP program has identified a significant number of FS deficiencies (over 400) attributable solely to incomplete, incorrect, or unsigned JCAFs, rather than to disputes over QCC values or underlying contract eligibility.

**Proposed solution to the issue described:**

Allow Participant-to-Participant qualifying contracts within the WRAP program to be validated without requiring executed JCAF signatures, provided that:

- Both counterparties are WRAP Participants
- The QCC is entered, reviewed, and mutually agreed upon by both parties in the EDST FS portal
- Each Participant completed the required Forward Showing executive certification attesting to the accuracy and completeness of its FS inputs.

Under this approach, EDST mutual agreement and executive FS certification would serve as the primary verification mechanism for QCC, eliminating the need for separate JCAF signatures for participant-to-participant transactions.

**Specific document and language you would like changed:**

This change would apply to WRAP Business Practice Manual 106 (Qualifying Contracts), specifically the provisions requiring executed Joint Contract Accreditation Forms for Participant-to-Participant qualifying contracts, as well as any related references to signature requirements where QCC is otherwise verified through the EDST Forward Showing process.

**Suggestion for how language could be updated to address issue:**

Revise BPM 106 to allow Participant-to-Participant qualifying contracts to satisfy accreditation requirements through mutual QCC confirmation in the EDST FS portal and completion of the Forward Showing executive certification, without requiring executed JCAF signatures.

The updated language should clarify that JCAF execution remains required where counterparties are non-Participants or where EDST mutual verification is not available, while explicitly recognizing EDST agreement and executive FS attestation as sufficient for participant-to-participant transactions.

City Light's FS program experience to date along with other WRAP participant data compiled by WPP and SPP indicate that over 400 Forward Showing deficiencies are attributable to incomplete or unsigned JCAF forms, rather than disagreements over QCC values. Allowing EDST based verification in lieu of JCAF signatures for participant-to-participant transactions would materially reduce administrative burden, improve compliance outcomes, and allow staff and participants to focus on substantive reliability requirements rather than duplicative paperwork.

**Describe the benefits that will be realized from this change:**

This change would significantly reduce administrative burden and improve compliance efficiency for WRAP Participants by eliminating a duplicative signature requirement for Participant-to-Participant qualifying contracts. Where both counterparties are WRAP Participants, QCC values are already mutually reviewed and agreed upon in the EDST Forward Showing portal, and each participant is required to certify all Forward Showing inputs through a senior executive attestation. Recognizing these existing contracts as sufficient verification removes unnecessary process steps without reducing accountability.

Allowing EDST mutual agreement and executive FS certification to serve in lieu of executed JCAF signatures would streamline the Forward Showing process, reduce delays, and all Participants to focus resources on substantive reliability and compliance activities rather than document routing. This change also improves program credibility by aligning documentation requirements with actual risk and control structures already embedded in WRAP.

**Any data/information that would characterize the importance of the issue:**

Program experience to date indicates that a substantial number of Forward Showing deficiencies are attributable solely to incomplete or unsigned JCAF forms, rather than disagreements over QCC values or contract eligibility. The WRAP program has identified over 400 FS deficiencies related specifically to JCAF completion issues.

These deficiencies create additional administrative workload for Participants and program staff and delay resolution of otherwise compliant Forward Showings. Given that EDST already requires mutual counterparty agreement and executive-level certification, the continued reliance on signed JCAFS for participant-to-participant transactions represents a disproportionate process burden relative to the compliance risk being addressed.

This process made sense when the Forward Showing workbooks were submitted via EXCEL document to SPP and there was no mutual platform for Participate-to-Participant inputs like currently available through EDST.

## 2025-CRF-014 / AMAZON / Large Load Exclusion

**WRAP Area:**

FS Demonstration

**Tarriff Change:**

Yes

**Time Score:**

Long

**Lead Sponsor:** Paul Garrett  
pdg@amazon.com**Co-Sponsor:****Summary:** Clarification of Load Exclusion for Independently Adequate Large Loads**Description of the issue:**

(This comment submitted on behalf of Brandon Oyer, Director, AMER Energy & Water, Infra. Perf Services)

Amazon Data Services, Inc. (ADS) appreciates the opportunity to submit this Change Request form for the Western Power Pool’s (WPP) Western Resource Adequacy Program (WRAP). Most of ADS' load in Oregon is included in WRAP through Bonneville Power Administration as the transmission provider and Load Responsible Entity. ADS requests WPP to amend WRAP BPM 103 – “Participate Forward Showing Capacity Requirements” to clarify that loads with sufficient backup generation can elect to exclude their load from the Load Responsible Entity’s load forecast.

**Background**

ADS develops and operates data centers to support cloud computing services offered by its affiliate Amazon Web Services (AWS). AWS provides the world’s most comprehensive and broadly adopted cloud computing services, offering over 240 fully featured services from data centers globally. Amazon.com, Inc. (“Amazon”), AWS’ parent company, has invested in over 600 renewable energy projects across 28 countries, and met its goal to match 100% of the electricity consumed by its global operations with renewable energy in 2023.

ADS has been constructing and operating data centers in eastern Oregon since 2011 to serve AWS and its customers. Since 2012, AWS has invested \$30.5 billion in the state and supported 7,400 estimated average full-time equivalent jobs at local businesses annually in eastern Oregon. In 2023, AWS contributed significantly to the local economy through property taxes and fee payments amounting to \$54.2 million.

ADS supports WRAP and appreciates the importance of firm and reliable load and resource planning. Like WPP, ADS values highly reliable electric supply to critical loads. As a customer-obsessed organization, ADS is keenly focused on maintaining the highest reliability possible for AWS customers and their critical business functions. ADS’ commitment to reliability has resulted in substantial investments in backup generation for its many data centers in the Pacific Northwest. At present, these resources represent a significant amount of regional standby generation. These investments ensure reliable

load service to ADS facilities even in the most extreme reliability events by allowing ADS to disconnect from the grid and use backup generation to maintain service.

Despite these generators providing resource adequacy, WRAP has not recognized their capacity in its planning framework. In a reliability event, this substantial set of resources stand ready to ensure service to the related load. A robust resource adequacy program should recognize these resources and their related loads to more accurately reflect the region’s resource adequacy status.

**Change Request**

WRAP BPM 103 currently provides that a Participant, or Load Responsible Entity, may seek to exclude loads from WRAP participation if the Participant is not the exclusive wholesale electricity provider for such loads. However, the designation is optional and the term “exclusive wholesale electricity provider” lacks a clear definition. In the face of these ambiguities, Load Responsible Entities, such as transmission providers, will set independent policies and requirements that result in disparate and changing requirements for load exclusion across the region. Even worse, many transmission providers may simply choose not to exclude any load.

The WPP should clarify WRAP to ensure that loads with dedicated backup generation, or energy storage systems, are entitled to load exclusion from the Load Responsible Entities. WRAP’s failure to adequately recognize backup generation could have negative consequences for years to come. If no resource adequacy is associated with backup generation, large regional loads will be disincentivized from investing in these types of onsite resources. In future reliability events, this lack of investment would result in more grid-reliant loads, unable to self-serve, and further widen the gap between loads and reliable regional generation.

ADS requests WPP to acknowledge backup generation as a significant existing regional resource. WPP should amend BPM 103 to clarify that loads with sufficient backup generation to serve their entire load have a right to load exclusion from their Load Responsible Entities.

**Proposed solution to the issue described:**

ADS requests that WPP update BPM 103 to clarify that entities with adequate backup generation or onsite energy storage dedicated to that load are entitled to load exclusion from their Load Responsible Entity. The impacted load should have the right to elect such load exclusion.

**Specific document and language you would like changed:**

BPM 103, section 7.

**Suggestion for how language could be updated to address issue:**

BPM 103, Section 7 should be revised to read in its entirety:

As described in BPM 108 FS Submittal Process, a Participant will include all loads in its FS Demonstration for which it is responsible: i.e. all loads within the Western Interconnect (that are not participating in another resource adequacy program or represented by another WRAP LRE) for which the Participant has an obligation to forward procure capacity to meet any portion of the load or for which the Participant is the exclusive wholesale electricity provider to a load serving entity.

A Participant ~~shall~~ ~~may~~ seek to exclude any loads from WRAP participation that a) provide proof of sufficient on-site backup generation or onsite storage to reliably serve the load and b) request such load exclusion from WRAP participation. A Participant may also seek to exclude loads from WRAP participation at the Participant’s discretion to the extent the Participant is not the exclusive wholesale provider for such load. This is distinct from a Participant modifying its P50 Peak Load Forecast to account for additions and removal of load. As part of its FS Demonstration, the Participant will attest that the Participant is not the exclusive wholesale provider for the load (see Appendix B - Load Exclusion). As part of its FS Demonstration, the Participant will also provide documentation of notice to the end-use customer of the Participant’s intent to exclude the load from WRAP in the form provided on the WPP website and acknowledged via signature by a senior official of the end-use customer. Excluded load may not be included in the Operations Program. Excluded load must be separately metered, such that the excluded load may be removed from load forecasting information to be provided in the Operations Program, as further discussed in BPM 202 Participant Sharing Calculation Inputs, and from the Historical Load Data utilized in Section 4. Loads may not be partially excluded.

**Describe the benefits that will be realized from this change:**

The proposed amendment will encourage future investment in backup generation on onsite storage while improving grid reliability by recognizing these significant regional resources. This change would allow WRAP to recognize the robust investment and planning in backup generation certain loads have made over the years.

This change, and any subsequent elections by large loads to pursue load exclusion, would also materially alleviate the projected regional shortfall in WRAP eligible capacity and lend credibility to any projections of load and resource deficits by taking into account this sizable and reliable resource.

**Any data/information that would characterize the importance of the issue:**

-

## 2025-CRF-015 / APS / WRAP Benefits

**WRAP Area:**

FS Capacity Requirement

**Tarriff Change:**

No

**Time Score:**

Medium

**Lead Sponsor:** Brandon Holmes  
brandon.holmes@aps.com**Co-Sponsor:****Summary:** Ops Program and External WRAP Resource Estimates**Description of the issue:**

Participants would benefit from a mechanism to reflect capacity reductions associated with WRAP participation in their resource adequacy and capacity expansion planning. WRAP maintains proprietary, non-public data for each participant, which appropriately cannot be shared. However, the presence of a proxy forecast of liquidity would greatly help incorporate WRAP benefits into reliability models.

To address this, forecasting liquidity assumptions—backed by WRAP’s adequacy design assurances—would enable participants to make reasonable, defensible assumptions about the level of support available from WRAP neighbors. This approach would:

- Improve representation of regional coordination in planning models.
- Reduce reliance on conservative margins currently used to meet adequacy targets.
- Align planning with evolving risk profiles as RA concerns shift from peak capacity to long-duration energy adequacy.

**Proposed solution to the issue described:**

Open to various solutions. Current suggestion is a study that would provide a liquidity assumption from WRAP to each participant that could support independent capacity expansion modeling. Proposal is to set a working group to navigate a variety of options and select what would be most impactful to allow the incorporation of WRAP benefits in PRM planning and continue to protect confidentiality of participant data.

**Specific document and language you would like changed:**

BPM 101 - Advance Assessment

**Suggestion for how language could be updated to address issue:**

-

**Describe the benefits that will be realized from this change:**

Significant customer savings from avoided capacity development.

**Any data/information that would characterize the importance of the issue:**

WRAP capacity requirements have traditionally been lower than independent planning. The amount varies by entity.

## 2025-CRF-016 / BPA / Non-WRAP BAA Loads

**WRAP Area:**

FS Capacity Requirement

**Tarriff Change:**

Yes

**Time Score:**

Medium

**Lead Sponsor:** Matt Hayes

mchayes@bpa.gov

**Co-Sponsor:****Summary:** Treat loads external to the WRAP footprint in the same manner as external long-term sales**Description of the issue:**

**Provide WRAP Participants with the option of treating loads located in BAA's external to the WRAP footprint in the same manner as they treat long-term sales external to the WRAP footprint.**

This change would allow participants to ensure that all loads are accounted for but remove these loads from the WRAP sharing obligation. Loads in BAA's not in the WRAP footprint must still be served by the participant; however, they are served through various mechanisms, including market-based purchases and through contractual agreements with those BAA's and are subject to a Market's sufficiency test (currently in real time and will likely soon be tested in both the day ahead and real time). WRAP treating these loads in the same manner as a long-term external sale ensures that the participant is still accounting for both the load and the use of resource capacity to serve that load in their Forward Showing, while separating that load from the Ops Program to reflect how this load is outside the WRAP footprint and is not served through the same mechanics as most WRAP load.

**Proposed solution to the issue described:**

- Treat load in BAA's external to the WRAP footprint as a contract obligation, identifying the specific load as a contract to the external BAA, which subtracts the corresponding system capacity "used" to serve the loads from the Participant's total QCC portfolio in the FS workbook (Removing both the obligation and the corresponding surplus capacity from the FS calculations). This is consistent with how long-term sales are treated.
- Add a Performance Adjustment delta to the sharing calculation in the OPS program for "loads in external BAA's". This performance delta would be calculated based on the actual forecasted load in BAA's external to WRAP, versus the FS capacity allocated to this same load. This preserves the LRE's obligation to serve these loads, ensures that any changes in that loads are accurately accounted for in all phases of the program, and prevents the participant from having a sharing obligation that is external to the current WRAP footprint (e.g. in a BAA that is not part of the current Program).
- In real operations, the LRE delivers an hourly schedule of generation to meet forecasted loads in an external BAA.

**Specific document and language you would like changed:**

-

**Suggestion for how language could be updated to address issue:**

-

**Describe the benefits that will be realized from this change:**

WRAP treating these loads in the same manner as a long-term external sale ensures that the participant is still accounting for both the load and the use of resource capacity to serve that load in their Forward Showing, while separating that load from the Ops Program to reflect how this load is outside the WRAP footprint and is not served through the same mechanics as most WRAP load.

**Any data/information that would characterize the importance of the issue:**

-

## 2025-CRF-017 / BPA / CRE Waiver

**WRAP Area:**

FS Demonstration

**Tarriff Change:**

Yes

**Time Score:**

Medium

**Lead Sponsor:** Matt Hayes

mchayes@bpa.gov

**Co-Sponsor:**

**Summary:** Proposal to waive all CONE charges/payments if commercially reasonable efforts have been made

**Description of the issue:**

Bonneville views this CRF as part of the ongoing discussion regarding the RAPC resolution to reform Forward Showing charges and the definition of commercially reasonable efforts. The goal of this CRF is to ensure that this discussion is held at the PRC level (via the PRC change process) as well as at the RAPC.

The discussion on Forward Showing charges should include exploring the option to waive charges if commercially reasonable efforts have been made because:

- a. Deferring the CONE penalty or partial CONE payment if commercially reasonable efforts have been demonstrated deters broad participation in the Program. The CONE penalty does nothing to resolve physical constraints or other factors that may have prevented a participant from meeting Forward Showing obligations despite commercially reasonable efforts.
- b. Charges should be applied to situations of negligence or nefarious intent rather than situations where a participant attempted to meet the obligations but failed due to external constraints.

**Proposed solution to the issue described:**

Waive all CONE charges/payments **if** commercially reasonable efforts have been made and demonstrated.

**Specific document and language you would like changed:**

-

**Suggestion for how language could be updated to address issue:**

-

**Describe the benefits that will be realized from this change:**

Will likely drive broader and more sustained WRAP membership.

**Any data/information that would characterize the importance of the issue:**

-

## 2025-CRF-018 / BPA / Load Responsibility Transfer

**WRAP Area:**

FS Capacity Requirement /  
Operations Program

**Tarriff Change:**

Yes

**Time Score:**

Medium

**Lead Sponsor:** Matt Hayes  
mchayes@bpa.gov

**Co-Sponsor:**

**Summary:** Loads Transfer between Forward Showing and Operations

**Description of the issue:**

The WRAP methodology holds the Load Responsible Entity (LRE) accountable for load from Forward Showing through Operations, even when contractual agreements exist for another party to serve that load in real-time. This discrepancy means WRAP calculations don't reflect real-world load service arrangements, misaligning responsibility and uncertainty calculations, particularly in the operational window. How these loads are served in a world with Day Ahead Markets should also be considered.

**Proposed solution to the issue described:**

Modify the WRAP methodology to allow the LRE to hold responsibility in the Forward Showing (planning responsibilities) but shift the load responsibility to the load's BA during the Operations program. This 'Transfer' of load would align Load Service Responsibility with what has been contracted for in real-time operations. The uncertainty in the sharing calculation would also shift, aligning with actual delivery.

**Specific document and language you would like changed:**

-

**Suggestion for how language could be updated to address issue:**

-

**Describe the benefits that will be realized from this change:**

This change will more accurately align the Program with how loads are served in reality. Allowing a Transfer of load would align WRAP Operations Program calculations with real-time operations for participants with existing contracts. This ensures Operations Program uncertainty aligns with the party serving the load in the operating hour, while the LRE remains responsible for all forward planning requirements. Aligning deliveries with the BA the load resides in will also help to realign the Program with how load will be served in future Day Ahead Markets.

**Any data/information that would characterize the importance of the issue:**

-

## 2025-CRF-019 / PAC / Data Center Loads

**WRAP Area:**

FS Capacity Requirement

**Tarriff Change:**

Yes

**Time Score:**

Long

**Lead Sponsor:** Benjamin Faulkinberry  
benjamin.faulkinberry@@pacificorp.com**Co-Sponsor:****Summary:** Program Consideration of Data Center Additions and Other Large Non-Conforming Loads**Description of the issue:**

A substantial portion of projected utility load growth is driven by large, non-conforming, high-load-factor resources such as data centers. As these loads represent an increasing share of the WRAP footprint, existing modeling practices and policy frameworks may require adjustment. WRAP should explicitly incorporate this trend when establishing Forward Showing capacity obligations for Participants. Furthermore, WRAP must ensure that Participants introducing these loads earlier, or maintaining portfolios with higher concentrations of such resources, are not disproportionately burdened with capacity requirements necessary to achieve the regional 1-in-10 LOLE reliability standard.

**Proposed solution to the issue described:**

Potential program adjustments could include:

-Separate treatment of large non-conforming loads. Participants with significant loads meeting defined criteria may be permitted to bifurcate these loads in Forward Showing submissions. These loads could require a distinct PRM or capacity requirement reflecting their non-weather-sensitive, high-load-factor characteristics while maintaining the 1-in-10 LOLE standard.

-Loads with curtailment provisions in their utility service agreements are not included in a Participant's Forward Showing.

-Locally resource-adequate loads are treated as demand response by the program, or not included in a Participant's Forward Showing.

**Specific document and language you would like changed:**

-

**Suggestion for how language could be updated to address issue:**

-

**Describe the benefits that will be realized from this change:**

Studying the impact of load growth from this customer category offers multiple benefits for Participants and strengthens WRAP's credibility. Analysis may show that lower

capacity requirements for these loads are feasible without compromising the 1-in-10 LOLE standard, provided they meet program-defined criteria.

Even if no policy changes result, Participants will gain publicly available resources to support discussions with regulators and prospective customers considering these load types.

**Any data/information that would characterize the importance of the issue:**

Load service for this customer class is frequently highlighted in industry and traditional media. Industry assessments, including WECC's resource adequacy reports, attribute a significant share of forecasted load growth to these customers.

## Appendix B – PRC Minutes Dec. 18<sup>th</sup>, 2024; 9-10am PPT

Sector	Representatives (bold in attendance)
RAPC/Participant Investor-owned Utilities (IOUs)	<ul style="list-style-type: none"> <li>• Phil Haines (Sachi Begur as alternate)</li> <li>• Camille Christen</li> <li>• Lindsey Schlekeway (Rodger Manzano as proxy)</li> <li>• Mike Goodenough</li> </ul>
RAPC/Participant Publicly-owned utilities (POUs)	<ul style="list-style-type: none"> <li>• Michael Reynolds (Jerret Fischer as proxy)</li> <li>• Ray Johnson (Leah Marquez-Glynn as proxy)</li> <li>• Garrison Marr</li> <li>• Mike Bradshaw</li> </ul>
RAPC/Participant Retail Competition Load Responsible Entity (LRE)	<ul style="list-style-type: none"> <li>• Ian White</li> <li>• Bill Goddard</li> </ul>
Federal Power Marketing Administration	<ul style="list-style-type: none"> <li>• Jeff Cook (Rachel Dribble as proxy)</li> <li>• Rachel Dibble</li> </ul>
Independent power producers/marketers	<ul style="list-style-type: none"> <li>• John Cooper (Benjamin Fitch Fleischmann as proxy)</li> <li>• Benjamin Fitch Fleischmann</li> </ul>
Public interest organizations	<ul style="list-style-type: none"> <li>• Fred Huetten (Max Greene as proxy)</li> <li>• Max Greene</li> </ul>
Retail customer advocacy group	<ul style="list-style-type: none"> <li>• Bela Vastag</li> </ul>
Industrial customer advocacy group	<ul style="list-style-type: none"> <li>• Sommer Moser (Tyler Pepper as proxy)</li> </ul>
Load Serving Entity (LSE) (or representative) with loads in the WRAP represented by another LRE and otherwise not eligible for any other sector	<ul style="list-style-type: none"> <li>• Chris Allen</li> </ul>
COSR	<ul style="list-style-type: none"> <li>• Chris Parker (Gia Anguiano as alternate)</li> </ul>

### Meeting Objectives

1. Provide Updates on Next Steps and Change Control Process

### Discussion Topics

- (I) Agenda Overview
- (II) COSR Representative Introduction  
*Chris Parker is the Director of Utah's Utilities and is the Vice Chair of the Community of State Representatives (COSR). He is looking forward to working with everyone.*
- (III) PRC Charter Finalization  
*The committee discussed the adjustments in the PRC Charter. Shifting focus from BPMs to Change Request Form (CRF) considerations, including workplan and proposal development, CRF compilation, prioritization, and board approval processes. The cadence for future meetings and minimum terms were also reviewed. Snohomish moved to approve the charter, seconded by NVEC. The motion passed, finalizing the PRC Charter.*
- (IV) NTFP Update  
*The meeting focused on two considerations: whether the submitted ideas, along with their proposed solutions, are ready for public and COSR comments, as well as PRC, RAPC, and board review. The focus is on readiness for comment, rather than subjective evaluation of the ideas themselves.*
  - I. Consideration of [2024-CRF-006](#) (aka 2024-NTFP-04) Status
    - i. Load Transfer and BPM 103 P50 Peak Load Forecast Methodology

*The Lead Sponsor: Garrison Marr (Snohomish County PUD)  
Co-sponsors: BPA and TEA*

*The proposal addresses the need for a revised load forecast methodology to better reflect forward-looking load responsibilities, particularly with changes to BPA power products in 2025. The current methodology is based on historical data, but the update seeks to align with future load share responsibilities. It allows for the addition or removal of load, improving accuracy in forecasting. The proposal would fix the BPM 103 methodology to accommodate load transfers and new loads.*

*Outcome: SRP moved to advance 2024-CRF-006 through the NTFP process for comment. Powerex seconded. The motion passed, and the proposal will move to comment.*

b. Consideration of [2024-CRF-009](#) Status

i. Definition of Generation and Transmission Facilities in BPM 209

*Lead Sponsor: Michael Reynolds (SRP)*

*The discussion focused on two terms in BPM 209 Section 7.3: "generation facility" and "transmission facility," which may benefit from formal definitions. The concern is that participants could expect automatic approval for a waiver in case of a generation or transmission facility outage or derate. The proposal aims to clarify that waivers would only apply when an outage or derate is relevant to meeting WRAP obligations, rather than being a general exemption. It was suggested that ownership of the asset is less important than whether the participant has the right to use it to meet WRAP obligations.*

*The proposal recommends capitalizing "generation facility" and "transmission facility" and adding definitions for each.*

*Outcome: Tacoma moved to approve the proposal for comment, seconded by Calpine. The motion passed with no opposition.*

(V) Change Control Process

*Please reference PowerPoint "PRC Concept Prioritization & LOE." The PowerPoint will act as a reference for the change Control Process moving forward.*

a. Draft Methodologies

i. High-level PA Level of Effort Review (Pre-PRC Prioritization)

*See slide 4, 5, 6 in PowerPoint "PRC Concept Prioritization & LOE"*

ii. PRC Prioritization of Concepts for Workplan consideration

*See slide 7 in PowerPoint "PRC Concept Prioritization & LOE"*

iii. Detailed PA/PO Level of Effort Review (Post-PRC Prioritization)

*See slide 8 in PowerPoint "PRC Concept Prioritization & LOE"*

*The goal is to prioritize submissions, focusing on those that are straightforward or critical with larger effort. Due to limited resources, some CRFs may not be addressed. As task forces continue developing proposals into next year, the PRC will need to*

*consider what resources are already committed to these efforts when working on 2026.*

*Co-Chairs Ray Johnson and Max Green propose to move forward with the process and allow for flexibility without having a formal vote.*

*Important to note, the concept of membership within WPP was formalized last year with the adoption of new bylaws, and participants in reliability programs like WRAP are already considered members. To formalize this, members will be asked to provide a point of contact. Carla Hudson from WPP will send an email requesting contact information. A similar process will be followed for allied partners, requiring them to sign an agreement to abide by WPP policies.*

*Upcoming Events: The PRC meeting is on the 23rd, followed by pickleball. The annual member meeting will be on the 24th. There are no fees, and the events are open to anyone interested in becoming a stakeholder.*

b. Concept & NTFP Submissions Update

*There are 35 Change Requests, with all but one from participants. The exception is Form, an external entity developing new 100-hour batteries. WPP is assisting all sponsors with their NTFP submissions and coordinating where duplicate ideas have been submitted, encouraging co-sponsorship or withdrawal of one to remove duplication of efforts. While Change Request forms can still be submitted until year-end, we appreciate those who submitted by the 15<sup>th</sup>, allowing time to make necessary edits. The meeting on 1/23 will review at least 30 submissions, possibly more.*

(VI) Next Steps

a. Meeting 1/15 9am PT

*WPP will determine if there are more NTFP to consider on 1/15, and will get ready for the meeting on 1/23 and what to expect there.*

b. (In-Person) Meeting 1/23 9am-12pm, Salt River Project's Pera Club, Tempe, AZ

*Meeting is adjourned at 9:55 AM.*

## Appendix C – PRC Minutes Jan. 28<sup>th</sup>, 2026; 12-4pm PPT

Sector	Representatives (bold in Attendance)
RAPC/Participant Investor-owned Utilities (IOUs)	<ul style="list-style-type: none"> <li>• Phil Haines (Sachi Begur as alternate)</li> <li>• Camille Christen (<b>Nicole Blackwell as proxy</b>)</li> <li>• Brandon Holmes</li> <li>• Mike Goodenough (Raj Hundal as Proxy)</li> </ul>
RAPC/Participant Publicly owned utilities (POUs)	<ul style="list-style-type: none"> <li>• Michael Reynolds (Camille Christen as proxy)</li> <li>• Ray Johnson (Camille Christen as proxy)</li> <li>• Michael Frantz</li> <li>• Mara Kontos</li> </ul>
RAPC/Participant Retail Competition Load Responsible Entity (LRE)	<ul style="list-style-type: none"> <li>• Ian White</li> <li>• Bill Goddard</li> </ul>
Federal Power Marketing Administration	<ul style="list-style-type: none"> <li>• Meg Albright (Steve Bellcoff as proxy)</li> <li>• Nita Zimmerman (Steve Bellcoff as proxy)</li> </ul>
Independent power producers/marketers	<ul style="list-style-type: none"> <li>• John Cooper (Benjamin Fitch Fleischmann as proxy)</li> <li>• Benjamin Fitch Fleischmann (Max Greene as proxy)</li> </ul>
Public interest organizations	<ul style="list-style-type: none"> <li>• Fred Huette (Max Greene as proxy)</li> <li>• Max Greene (Fred Huette as proxy)</li> </ul>
Retail customer advocacy group	<ul style="list-style-type: none"> <li>• Bela Vastag (Alyson Anderson as proxy)</li> </ul>
Industrial customer advocacy group	<ul style="list-style-type: none"> <li>• Sommer Moser (Tyler Pepper as proxy)</li> </ul>
Load Serving Entity (LSE) (or representative) with loads in the WRAP represented by another LRE and otherwise not eligible for any other sector	<ul style="list-style-type: none"> <li>• Damon Pellicori</li> </ul>
COSR	<ul style="list-style-type: none"> <li>• Chris Parker (Elliot Nethercutt as alternate)</li> </ul>

### Meeting Objectives

- Review and prioritize Concepts for inclusion in the 2026 Workplan, in preparation for the Level of Effort review beginning February 1.

### Discussion Topics

- I. Agenda Overview
- II. 2026 Workplan:
  - a. Introductions (10 Minutes)
  - b. Process Overview (20 Minutes) – See PowerPoint
    - i. PRC reviewed governance process for concepts submitted via the Change Request Portal.
    - ii. 12 eligible concepts submitted for 2026; staff recommended consolidation to 9 concepts.
    - iii. WPP presented a high-level Level of Effort (LOE) assessment (Short/Medium/Long) to inform prioritization.
    - iv. PRC conducted a single-round prioritization exercise.

c. Concept Sponsors present submissions (120 Minutes) – See CRF Compilation Slides for overview

i. CRF-07 / CRF-11 – WRAP E-Tags (Chelan PUD / SCL)

Notes:

- Both concepts relate to the creation of WRAP E-Tag identifiers/designations.
- Spoke with Sponsors and interested in consolidating (which maintains each of their concerns) into a single Task Force.
- Considered a low-complexity, short-duration task.
- Questions raised on interaction with existing market requirements (e.g., M+)

ii. CRF-09 / CRF-10 – Regional Transmission for Capacity (NWE / RNW)

Notes:

- CRF-09 (Regional Transmission) and CRF-10 (Transmission for Capacity) recommended for consolidation into a single task force
- RNW proposal focuses on accrediting transmission toward capacity/QCC; NWE proposal focuses on PRM impacts and modeling treatment.
- Concept explores whether inter-regional transmission (e.g., diversity transfers such as North Plains Connector) can provide measurable capacity and reliability value.
- Discussion emphasized evaluating feasibility and methodology (e.g., ELCC-based approaches), without presupposing outcomes or PRM reductions.
- Potential tariff changes may be required depending on findings.
- Recognized as analytically complex, with significant modeling and data considerations.
- Broad support for a task force to establish a structured framework, clarify assumptions (firm vs. non-firm), and assess implications before drawing conclusions.

iii. CRF-12 – Shoulder Month PRMs (SCL)

Notes:

- Proposes limited relief from deficiency charges during shoulder months.
- Intended to address volatility where PRM-driven requirements exceed historical peak load.

- Discussion noted interaction with PRM Task Force outcomes and timing of implementation.
  - Concept considered specific in scope; questions raised about consistency and applicability across participants.
- iv. CRF-13 – Inter-Participant JCAFs (SCL)
- Proposes streamlining Joint Capacity Accreditation Forms (JCAFs).
  - Would reduce administrative burden by limiting signature requirements to a one-time execution.
  - No change to substantive obligations; focused on process efficiency.
  - Generally viewed as a lower-complexity concept.
- v. CRF-14 / CRF-19 – Large Load Exclusion / Data Center Loads (AWS / PacifiCorp)
- Notes:
- Recommended consolidation into a joint task force.
  - Focuses on how large loads (e.g., data centers) are treated for capacity obligations.
  - Explores criteria for excluding load with adequate behind-the-meter generation.
  - Emphasis on maintaining the 1-in-10 LOLE standard while improving equity and planning certainty.
  - Data availability, verification, and policy clarity identified as key considerations.
- vi. CRF-15 – WRAP Benefits (APS)
- Notes:
- Proposes analysis to quantify benefits of WRAP participation using LOLE-based methods.
  - Not intended to reduce capacity requirements or change compliance obligations.
  - Concept framed as informational, leveraging existing submitted data.
  - Concerns noted around interpretation, confidentiality, and public dissemination of aggregate results.

vii. CRF-16 – Non-WRAP BAA Loads (BPA)

Notes:

- Proposes treating non-WRAP BAA loads as contracted sales for Forward Showing purposes.
- Would dedicate generation to serve those loads but exclude them from real-time operations.
- Intended to better align WRAP compliance with operational reality.
- Discussion noted applicability may extend beyond BPA.

viii. CRF-17 – CRE Waiver (BPA)

Notes:

- Proposal to provide relief related to Clean Resource Eligibility (CRE)
- Feedback suggested reframing as a deferral rather than a waiver.
- Concept scope remains narrow and targeted.

ix. CRF-18 – Load Responsibility Transfer (BPA)

Notes:

- Resubmission of a prior-year concept.
- Aims to better align WRAP compliance with how load responsibility transfers occur operationally.
- Specific to WRAP participants; focused on structural alignment rather than policy expansion.

d. Prioritize CRFs (60 Minutes)

As a result of the prioritization exercise by the PRC, this is the priority order:

1. CRF-07/11 E-Tags (CPUD / SCL)
2. CRF-09/10 Regional Tx For Capacity (NWE / RNW)
3. CRF-12 Shoulder Month PRMs (SCL)
4. CRF-13 P-to-P JCAFs (SCL)
5. CRF-16 Non-WRAP BAA Loads (BPA)
6. CRF-14/19 Data Center / Larger Loads (AWS / PAC)
7. CRF-18 Load Responsibility Transfer (BPA)
8. CRF-17 CRE Waiver (BPA)
9. CRF-15 WRAP Benefits (APS)

2026 Plan Option 1:

Year	Stream #1	Stream #2
2026	Jul–Aug: CRF-07/11 E-Tags (S) Sep–Dec: CRF-12 Shoulder month PRM (M)	Jul–Dec: CRF-09/10 Regional Tx for Capacity (L)
2027	Jan–Feb: CRF-13 P-to-P JCAF (S) Mar–Jun: CRF-16 Non-WRAP BAA Loads (M)	Jan–Jun: CRF-14/19 Data Center/Large Loads (L)

2026 Plan Option 2:

Year	Stream #1	Stream #2
2026	<u>Jul-Aug:</u> CRF-07/11 E-Tags (S) <u>Sep-Dec:</u> CRF-12 Shoulder month PRM (M)	<u>Jul-Aug:</u> CRF-13 P-to-P JCAF (S) <u>Sep-Dec:</u> CRF-16 Non-WRAP BAA Loads (M)
2027	<u>Jan-Jun:</u> CRF-09/10 Regional Tx for Capacity (L)	<u>Jan-Jun:</u> CRF-14/19 Data Center/Large Loads (L)

Notes:

- Focus of today’s meeting was prioritization; voting mechanics can be refined later.
- PRC deadline: first draft due by March 15, followed by a one-month comment period.

Motion

- Stebe Belcoff (BPA) moved to keep current prioritization while creating two streams in the workplan; seconded by Michael Reynolds (SRP).
  - Discussion noted that some participants were not present; approaches encouraging broader feedback were supported.
  - Motion passed.
- e. Review indicative Workplan (30 Minutes)
- Two alternative two-stream indicative workplans reviewed.
  - Discussion highlighted tradeoffs between advancing short, near-term items versus initiating long, complex efforts earlier.
  - Emphasis that today’s decision was prioritization, not final sequencing.

III. 2026 Workplan Next Steps

- a. 2026 PRC Workplan Development
  - i. Feb 1 – Feb 15: Level of Effort Review
  - ii. Feb 15 – Mar 15: Draft Workplan refinement and completion
- b. PRC Meetings (Workplan Checkpoints)
  - i. Feb 11: Initial feedback following LOE review start
  - ii. Feb 25: Review refined concepts and prioritization
  - iii. Mar 11: Final input on Draft Workplan

IV. Any Other Business

- a. PRM Task Force Proposal

- i. Feb 10th: Q&A Session for PRM Task Force Proposal
- ii. Comment Period Closes Feb 18th

## Appendix D – PRC Minutes Feb. 11<sup>th</sup>, 2026; 8:30-10am PPT

Attendance:

Sector	Representatives (bold in Attendance)
RAPC/Participant Investor-owned Utilities (IOUs)	<ul style="list-style-type: none"> <li>• Phil Haines (Sachi Begur as proxy)</li> <li>• Camille Christen</li> <li>• Brandon Holmes (Tyler Moore as Proxy)</li> <li>• Mike Goodenough (Dan O’Hearn as Proxy)</li> </ul>
RAPC/Participant Publicly owned utilities (POUs)	<ul style="list-style-type: none"> <li>• Michael Reynolds (Camille Christen as proxy)</li> <li>• Ray Johnson</li> <li>• Mara Kontos</li> <li>• Michael Frantz</li> </ul>
RAPC/Participant Retail Competition Load Responsible Entity (LRE)	<ul style="list-style-type: none"> <li>• Ian White</li> <li>• Bill Goddard</li> </ul>
Federal Power Marketing Administration	<ul style="list-style-type: none"> <li>• Meg Albright (Steve Bellcoff as proxy)</li> <li>• Nita Zimmerman (Steve Bellcoff as proxy)</li> </ul>
Independent power producers/marketers	<ul style="list-style-type: none"> <li>• John Cooper (Max Greene proxy)</li> <li>• Benjamin Fitch Fleischmann (Max Greene as proxy)</li> </ul>
Public interest organizations	<ul style="list-style-type: none"> <li>• Fred Huette (Max Greene as proxy)</li> <li>• Max Greene (Fred Huette as proxy)</li> </ul>
Retail customer advocacy group	<ul style="list-style-type: none"> <li>• Bela Vastag (Alyson Anderson as proxy)</li> </ul>
Industrial customer advocacy group	<ul style="list-style-type: none"> <li>• Sommer Moser (Tyler Pepper as proxy)</li> </ul>
Load Serving Entity (LSE) (or representative) with loads in the WRAP represented by another LRE and otherwise not eligible for any other sector	<ul style="list-style-type: none"> <li>• Damon Pellocori</li> </ul>
COSR	<ul style="list-style-type: none"> <li>• Chris Parker (Elliott Nethercutt as alternate)</li> </ul>

### Meeting Objectives

- Discuss WPP’s Level of Effort Review to inform draft 2026 Workplan.
- Seek PRC endorsement of 2026-NTFP-01 (WPP BPM Annual Review).

### Discussion Topics

V. Agenda Overview

VI. WRAP Proposals:

a. Expedited Proposal for BPM 105 Edits (Align VER Zones with Subregions) –

Board approved

- Board-approved expedited proposal aligning wind and solar zones with updated subregions.
- Idaho incorporated into the Northwest subregion.
- BPMs and maps updated on the WPP website.
- No comments or questions raised.

b. 2025-NTFP-04 – BPA’s Proposal Update

- BPA reviewing public comments; no decisions yet on next steps.

- Reminder: proposal will be revised as needed before COSR comment period.

c. [2026-NTFP-01](#) (WPP BPM Annual Review): Seeking PRC Endorsement

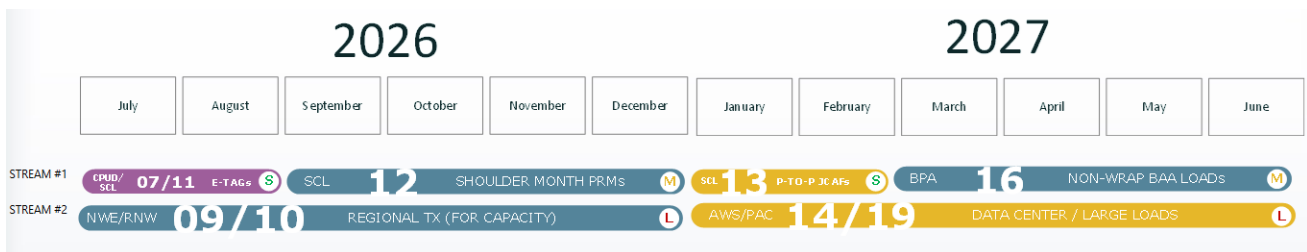
- i. Received no public comments
- Non-task force proposal addressing non-substantive edits (typos, grammar, clarifications).
- One public comment received from BPA; incorporated.
- Proposed edit to BPM 105 regarding operational testing timelines withdrawn and to be addressed via a separate NTFP.
- Motion: PRC endorsement of 2026-NTFP-01
  - Moved and seconded
  - Approved with no opposition

VII. 2026 Workplan:

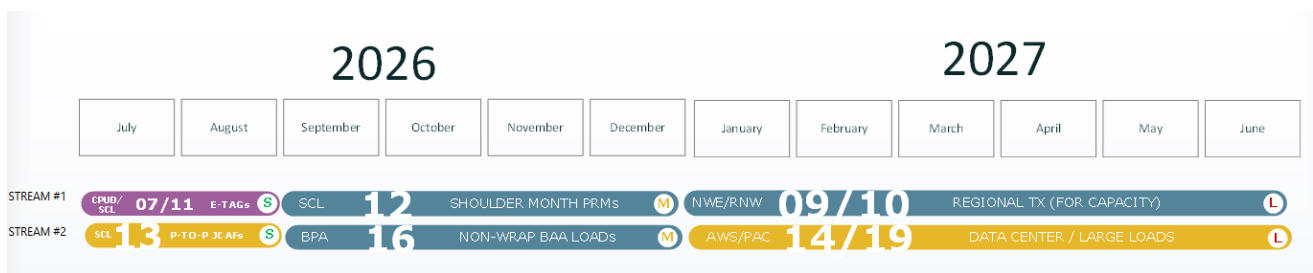
a. Level of Effort review update

- PRC previously prioritized 9 concepts into 2 workstreams.
- LOE assumptions:
  - Short = 2 months
  - Medium = 4 months
  - Long = 6 months
- Three indicative workplan options reviewed:

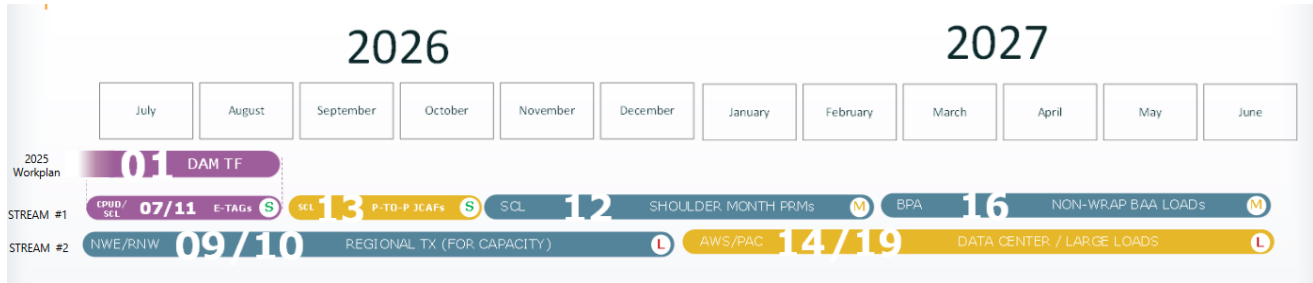
Workplan 1: Strict prioritization order



Workplan 2: Emphasis on early wins (short/medium concepts first)



Workplan 1A: Hybrid approach informed by LOE, bandwidth, and implementation timing



- Key Discussion Themes
  - Desire to advance “early win” items that could be implemented before the first binding season.
  - E-Tags: Proposed to be absorbed into the Day-Ahead Markets Task Force due to overlap; DAM TF currently paused.
- Shoulder Month PRMs:
  - Distinct from PRM Task Force scope due to deficiency charge implications.
  - Seattle emphasized material concern and potential participation impacts.
  - Discussion on whether and how this could align with PRM Task Force outcomes.
- Recognition of bandwidth constraints and dependency on completing 2025 workplan task forces first.
- Clarification that task forces are considered complete once proposals are issued for public comment, though meetings may continue during approval.

VIII. 2026 Workplan Next Steps

c. 2026 PRC Workplan Development

- iii. Feb 1 – Feb 15: Level of Effort Review
- iv. Feb 15 – Mar 15: Draft Workplan refinement and completion
- v. Mar 15 – Apr 15: Draft workplan out for comment

- d. PRC Meetings (Workplan Checkpoints)
  - i. Feb 11: Initial feedback following LOE review start
  - ii. Feb 25: Review refined concepts and prioritization
  - iii. Mar 11: Final input on Draft Workplan
  
- IX. Any Other Business
  - a. PRM Task Force Proposal
    - i. Comment Period Closes Feb 18th

## Appendix E – PRC Minutes Feb. 25<sup>th</sup>, 2026; 8:30-10am PPT

### Attendance:

Sector	Representatives (bold in Attendance)
RAPC/Participant Investor-owned Utilities (IOUs)	<ul style="list-style-type: none"> <li>• Phil Haines (Sachi Begur as proxy)</li> <li>• Camille Christen</li> <li>• Brandon Holmes (Tyler Moore as Proxy)</li> <li>• Mike Goodenough (Dan O’Hearn as Proxy)</li> </ul>
RAPC/Participant Publicly owned utilities (POUs)	<ul style="list-style-type: none"> <li>• Michael Reynolds (Camille Christen as proxy)</li> <li>• Ray Johnson</li> <li>• Mara Kontos</li> <li>• Michael Frantz</li> </ul>
RAPC/Participant Retail Competition Load Responsible Entity (LRE)	<ul style="list-style-type: none"> <li>• Ian White</li> <li>• Bill Goddard</li> </ul>
Federal Power Marketing Administration	<ul style="list-style-type: none"> <li>• Meg Albright (Steve Bellcoff as proxy)</li> <li>• Nita Zimmerman (Steve Bellcoff as proxy)</li> </ul>
Independent power producers/marketers	<ul style="list-style-type: none"> <li>• John Cooper</li> <li>• Benjamin Fitch Fleischmann</li> </ul>
Public interest organizations	<ul style="list-style-type: none"> <li>• Fred Huette (Max Greene as proxy)</li> <li>• Max Greene (Fred Huette as proxy)</li> </ul>
Retail customer advocacy group	<ul style="list-style-type: none"> <li>• Bela Vastag (Alyson Anderson as proxy)</li> </ul>
Industrial customer advocacy group	<ul style="list-style-type: none"> <li>• Sommer Moser (Tyler Pepper as proxy)</li> </ul>
Load Serving Entity (LSE) (or representative) with loads in the WRAP represented by another LRE and otherwise not eligible for any other sector	<ul style="list-style-type: none"> <li>• Damon Pellocori</li> </ul>
COSR	<ul style="list-style-type: none"> <li>• Chris Parker (Eliott Nethercutt as alternate)</li> </ul>

### Meeting Objectives

- Discuss WRAP Proposal updates and draft 2026 Workplan prioritization of concepts.

## Discussion Topics

- I. Agenda Overview
- II. WRAP Proposals:
  - a. PRM Task Force Proposal
    - Five comment sets received (three Task Force members; two non-Task Force participants).
    - Task Force met February 24 to review comments.
    - Decision: Reopen discussion on topics where changes or reconsideration were requested.
    - Next three meetings dedicated to evaluating potential revisions.
    - Goal: Issue updated proposal for additional comment by 3/18 (if revisions warranted).
  - III. 2025 Workplan Update:
    - a. Demand Response QCC Task Force
      - Draft proposal and BPM 105 redlines under development.
      - Methodology shifts from seasonal claim-based QCC to monthly QCC using 10-year Capacity Critical Hour dataset.
      - Tool incorporates dispatch constraints (daily/weekly/monthly limits), blackout periods, and fatigue functionality.
      - User guide to accompany Excel tool (non-governed document).
      - Next meeting to review draft proposal and testing framework updates.
    - b. ELCC+ QCC Task Force
      - Second meeting held; Co-Chairs confirmed. Mike Thompson (Form) and Akhil Mandadi (APS)
      - Initial meetings focused on:
        - Current ELCC process overview.
        - Current QCC accreditation pathway.
        - Problem statements from sponsors.
        - Bi-weekly meetings established.
- IV. WRAP 2026 Prioritization Update

### RAPC Input (In-Person Meeting Recap)

- RAPC provided early input ahead of public comment period.
- Emphasized focus on issues critical to the March 31 Forward Showing deadline for first binding season (Winter 2027–28).
- Recommended prioritizing items that materially affect binding readiness and participant certainty.
- Acknowledged PRC retains full authority over Workplan decisions and reprioritization flexibility.

### Proposed Workplan Refinements

#### Key Adjustments:

- Reboot Day-Ahead Market (DAM) Task Force (including e-Tags concept).
- Prioritize Large Loads / Data Centers concept ahead of Regional Transmission.
- Consider initial scoped discussion (e.g., white paper) on Regional Transmission as Capacity prior to full modeling effort.
- Advance Non-WRAP BAA Loads following ELCC and load-related discussions.
- Address Participant-to-Participant JCAF via Non-Task Force Proposal (NTFP) route rather than full Task Force.
- Address Forward Showing Deficiency Deferral via expedited proposal; assess overlap with PRM discussions.
- Deprioritize certain lower-impact 2025 items (e.g., capability testing off-season; joint owner flexibility) unless needed.

#### Committee Discussion

- General acknowledgment that the revised draft reflects stakeholder input and workload realities.
- Recognition of the need to balance:
  - Binding readiness,
  - Staff and stakeholder bandwidth,
  - Interaction between 2025 and 2026 Workplan items.
- No formal action taken; direction provided to staff to draft refined Workplan package.

#### V. 2026 Workplan Next Steps

- Staff to circulate draft 2026 Workplan package to PRC in advance of March 11 meeting.
- PRC to review and provide final input at March 11 meeting.
- Target to release Draft Workplan for public comment by March 15 (one-month comment period).
- Members encouraged to provide interim feedback to Chairs and staff prior to next meeting.
- 2026 PRC Workplan Development
  - i. Feb 15 – Mar 15: Draft Workplan refinement and completion
  - ii. Mar 15 – Apr 15: Draft workplan out for comment
    - PRC Meetings (Workplan Checkpoints)
      - i. Mar 11: Final input on Draft Workplan

# Appendix F – 2026 Workplan Stakeholder Review

## Comments

### Comment Prompts

01. Please supply any comments on the draft Task Force Schedule found in Figure 5 (Schedule III)
02. Please supply any comments on Concepts that would provide valuable clarification ahead of the March 31st, 2027, Forward Showing Deadline for the first Binding Season of Winter 2027-2028
03. Please supply any comments on the Executive Summary
04. Please supply any comments on Section 1. Background
05. Please supply any comments on Section 2. PRC Prioritization Exercise
06. Please supply any comments on Section 3. Detailed Level of Effort Review
07. Please supply any comments on Section 4. Proposed Schedule and Plan of Action
08. Please supply any comments on Appendix A - Change Request Form Compilation
09. Please supply any comments on Appendix B - PRC Minutes Dec. 18th, 2024
10. Please supply any comments on Appendix C - PRC Minutes Jan. 28th, 2026
11. Please supply any comments on Appendix D - PRC Minutes Feb. 11th, 2026

General Comment

Tacoma Power (Thad LeVar – tlevar@tacoma.gov)

**01. Please supply any comments on the draft Task Force Schedule found in Figure 5 (Schedule III)**

This timeline appropriately balances the issues prioritized by the PRC into manageable workstreams.

**02. Please supply any comments on Concepts that would provide valuable clarification ahead of the March 31st, 2027, Forward Showing Deadline for the first Binding Season of Winter 2027-2028**

The prioritization of PRM issues, along with consolidating the potential for deficiency charge deferrals with the PRM discussion, focuses on the issues most crucial to address in preparation for the first Binding Season of Winter 2027-28.

**03. Please supply any comments on the Executive Summary**

Tacoma Power appreciates the work of the PRC and its members, both in submitting CRFs and participating in the prioritization discussions. We support the draft workplan and hope that the work and expertise already created by task forces in 2025 and 2026 can carry forward as a starting point for the upcoming workstreams.

**04. Please supply any comments on Section 1. Background**

Tacoma Power values this background information and does not have any specific comments on this section.

**05. Please supply any comments on Section 2. PRC Prioritization Exercise**

Tacoma Power believes the Prioritization Exercise gave participants an opportunity to discuss the issues that are most critical in the short-term and long-term. We also believe there are lessons to be learned from this year's exercise. In hindsight, the secret-ballot nature of the voting process seemed complicated. A committee discussion of prioritization, with iterative roll-call votes as that discussion evolves, could be an option to consider in the future. We support the current prioritization and workstream, and hope that future attention can be given to any CRF that was not prioritized during this year's process. Tacoma Power sees value in future prioritization of the proposal to provide additional transparency to WRAP benefits through resource estimates.

**06. Please supply any comments on Section 3. Detailed Level of Effort Review**

Tacoma Power does not have any comments specific to this section but supports the outcomes described in it.

**07. Please supply any comments on Section 4. Proposed Schedule and Plan of Action**

Tacoma Power supports the outcomes described in this section. Given the substantive forward showing design changes proposed by the current PRM Task Force, the first task of any Shoulder Month PRM (SCL #12) analysis should be to review the PRM Task Force proposal to determine whether further PRM changes are needed or whether the forward showing process with the PRM Task Force proposals sufficiently meets participant needs. It may be that with the PRM Task Force’s proposed changes to the forward showing, particularly the proposed shortening of the seasons, a second PRM change process is unnecessary.

**08. Please supply any comments on Appendix A - Change Request Form Compilation**

Tacoma Power does not have any comments specific to this section but appreciates the transparent process represented within that compilation.

**General Comment**

Tacoma Power appreciates the opportunity to comment on this draft workplan, and the work of WRAP and WRAP Participants to evaluate priorities in advance of the Winter 2026-27 Binding Season. Considering that approaching deadline, this draft workplan appropriately prioritizes the most crucial issues. The task forces that have been operating throughout 2025 and 2026 have made meaningful progress and built a valuable knowledge base. We hope the continuing workstreams described in the draft workplan can build on that progress and knowledge base. We recognize that not every issue submitted to the PRC was able to be included in this Draft Workplan, and we hope that issues that were not prioritized here can receive continued attention later. Specifically, Tacoma Power agrees that participants would gain significant value from a more transparent quantification of WRAP benefits and capacity savings.

NorthWestern Energy (Quinn McCarthy –  
quinn.mccarthy@northwestern.com)

**01. Please supply any comments on the draft Task Force Schedule found in Figure 5 (Schedule III)**

NorthWestern appreciates the PRC’s, WPP’s, and RAPC’s thoughtful prioritization of the 2025 CRFs in the PRC’s 2026 DRAFT Workplan. In regard to NorthWestern and Renewable Northwest’s joint 2025-CRF-9/10, NorthWestern requests that the PRC clarify the “Workgroup (White paper)” stream, occurring in August/September 2026, to specifically indicate the following: “2025-CRF-9/10 concept sponsors and any additional interested parties, known as the Regional Transmission Workgroup, will meet as necessary during the months of August and September 2026, along with assigned WPP and SPP personnel, to draft preliminary indicative policy regarding the treatment of new regional transmission in the program. Additionally, the Workgroup will work with SPP and WPP staff to define and plan modeling work, possibly within the 2026 Advanced Assessment LOLE modeling (for the S28 & W28-29 seasons), to quantify the potential of: 1) NPC Project Diversity Transfers & FS PRM Decremental Effect 2) NPC Project as a Qualifying Resource with defined Qualifying Capacity Contribution (QCC) values” These two additional NPC Project scenarios would be in addition to the study work outlined in the S28 & W28-29 Study Scope Document. The Summer 2028 LOLE Studies should be completed by 10/31/26 and the Winter 28-29 LOLE Studies should be completed by 3/31/27. NorthWestern requests that SPP provide the Regional Transmission Workgroup with the NPC Project S28 and W28-29 scenario LOLE modeling results as soon as the results become available. The modeling results would be valuable to the Regional Transmission Workgroup in assessing the potential value that regional transmission projects could provide to WRAP participants. The Regional Transmission Workgroup and any additional interested parties would convene in April 2027 to form the Regional Transmission Task Force. This Regional Transmission Task Force would discuss the results of SPP’s NPC Project LOLE modeling and further develop the 2025-CRF-9/10 concepts into a formal Proposal during the period April 2027 through October 2027.

**05. Please supply any comments on Section 2. PRC Prioritization Exercise**

NorthWestern would like to thank the PRC for formally prioritizing NorthWestern and Renewable Northwest’s joint 2025-CRF-9/10 as the second highest 2025 Change Request Form ranking during the PRC’s 1/28/26 meeting. The high prioritization of 2025-CRF-9/10 reflects the PRC’s recognition of the very high value proposition that regional transmission projects could provide to the WRAP.

## Renewable Northwest (Kyle Unruh – [kyle@renewablenw.org](mailto:kyle@renewablenw.org))

### **01. Please supply any comments on the draft Task Force Schedule found in Figure 5 (Schedule III)**

Renewable Northwest (“RNW”) appreciates the opportunity to comment on the Draft Workplan, specifically regarding the approach of the draft Task Force Schedule toward the combined RNW-Interwest Energy Alliance-GridLab-Northwestern Energy (“NWE”) 2025-CRF-9/10 addressing interregional transmission. RNW was pleased that 2025-CRF-9/10 received the second-highest prioritization at the January 28, 2026 Program Review Committee (“PRC”) meeting. This prioritization appears to reflect a broad, cross-sector consensus that relieving transmission constraints and improving interregional connectivity will support regional adequacy and offer solutions to problems facing the western electricity grid. The draft Task Force Schedule attempts to balance that high priority with the need to address certain program changes for WRAP participants before the March 31, 2027 Forward Showing (“FS”) Deadline. Accordingly, rather than standing up a full interregional transmission Task Force in 2026, the Task Force Schedule contemplates developing a white paper on the topic in Q3 2026 then convening a Task Force in Q2 2027. Regarding the white paper, RNW supports the comments of NWE. Specifically, RNW requests that the process of developing the white paper be open and, at a minimum, include representatives from the concept sponsors. RNW also requests that white paper development include modeling to assess both PRM and QCC methods for crediting the value of transmission for resource adequacy. RNW understands that Grid United, the developer of the interregional North Plains Connector transmission line, has offered the use of its in-house ELCC software, SERVIM, to support this modeling effort. RNW encourages WPP to work with Grid United on appropriate modeling to support eventual program changes. Regarding the Task Force, RNW requests that the final Workplan explicitly reflect the flexibility to accelerate the start date ahead of April 2027 if possible. RNW appreciates that the April 2027 date immediately follows the March 31, 2027 FS Deadline that is driving the accelerated time frame for some other Task Forces, and that the approach currently reflected in the draft Workplan allows Task Forces with time-sensitive work before the FS Deadline to go first in time while still making progress on interregional transmission. Including language acknowledging the possible acceleration of the interregional transmission Task Force would similarly reflect the high prioritization of this Task Force’s work. Accelerating the Task Force may also be appropriate if the contemplated white paper offers a clear path forward on interregional transmission.

### **General Comment**

RNW appreciates that WRAP's governance process channels the change process through the PRC, the body reflecting broad, sector-based representation. In approving the WRAP Tariff, FERC specifically found that the "governance structure" – including the PRC, which comprises representatives of interested sectors as well as participants – "strikes a reasonable balance between allowing Participants to make decisions and enabling interested non-Participant stakeholders to observe and comment on those decisions." *Nw. Power Pool*, 182 FERC ¶ 61,063, 61,519 (2023). FERC stressed the importance of adequate "openness and inclusiveness" in the governance process. *Id.* Given this, RNW also appreciates RAPC's attempt to problem-solve and identify a path forward that reflects the priority afforded to interregional transmission by the PRC while still making progress on Task Forces necessary to allow participants to meet their FS obligations and remain in the program. However, we note that the draft Task Force Schedule currently reflects an approach developed by RAPC. In the spirit of WRAP's FERC-approved governance structure, we encourage WPP and the PRC to consider adopting the clarifications set forth in our comments above and NWE's comments in order to more fully reflect the interests of both participants and non-participants.

Grid United (Jackson Parthasarathy –  
Jackson.parthasarathy@gridunited.com)

**01. Please supply any comments on the draft Task Force Schedule found in Figure 5 (Schedule III)**

Grid United appreciates the extensive work reflected in the Draft 2026 Workplan and commends the PRC for maintaining flexibility ahead of the first binding season. We recognize that interregional transmission concepts, including 2025 CRF 09/10 REGIONAL TX (FOR CAPACITY), were initially ranked as the second highest priority during the PRC prioritization exercise on January 28, 2026. We further acknowledge that, through subsequent discussions, these concepts were deprioritized relative to efforts viewed as having more “immediately deliverable outcomes” prior to the first binding Forward Showing. While Grid United understands and respects the need to focus on near term binding readiness, we believe that the interregional transmission workstream is uniquely positioned to advance efficiently and with relatively modest incremental burden on WPP and SPP staff. Grid United has existing technical expertise, prior stakeholder engagement, and licensed modeling capabilities using SERVIM, the same production cost and reliability modeling platform currently relied upon by SPP and WRAP. Leveraging this foundation, Grid United believes that meaningful progress on this concept can be achieved through a short or medium level of effort rather than a Long six month Task Force cycle. With respect to the August–September workgroup contemplated for development of a white paper related to 2025 CRF 09/10, Grid United respectfully seeks clarity regarding the intended outcome of this process. Grid United stands ready to contribute staff time and analytical resources to support a structured, transparent, and technically grounded effort that results in a clearly articulated preliminary policy proposal supported by modeling results. In our view, a focused two month white paper effort has the potential to substantially narrow outstanding policy questions and reduce the scope of subsequent Task Force work. Accordingly, Grid United encourages the PRC to view the white paper process as an opportunity to materially reduce the remaining time required to complete this workstream. Successful completion should enable the PRC to reconsider the current “Long” time score assigned to 2025 CRF 09/10 and potentially advance the full Task Force effort on an accelerated schedule more commensurate with its original prioritization and broad stakeholder interest. Prioritizing this effort would provide needed policy clarity for interregional transmission investments such as North Plains Connector that have the potential to deliver material capacity value to the WRAP, thereby reducing uncertainty and encouraging development of additional projects that benefit WRAP participants. This workstream should be treated as a priority given the magnitude of potential savings for

participants and their ratepayers. Preliminary Grid United analysis indicates that the North Plains Connector alone could yield on the order of 1,500 MW (1,500,000 kW) of capacity value to the WRAP, equivalent to approximately \$138 million per year when applying the 2022 WRAP CONE of \$91.81 per kW-year. These estimates are conservative, as they rely on an outdated CONE value and do not capture the growing diversity of the eastern and western grids.

#### **06. Please supply any comments on Section 3. Detailed Level of Effort Review**

Grid United seeks clarification regarding the apparent inconsistency in the timing of the 2025-CRF-09/10 Regional Transmission for Capacity Task Force as depicted across figures in the Draft Workplan. Specifically, Figure 3 appears to indicate a January 2027 start, while Figure 5 suggests an April 2027 initiation. More broadly, Grid United appreciates the PRC's recognition of staff and stakeholder bandwidth constraints as reflected in the level of effort review. At the same time, we believe the long-time score currently assigned to 2025-CRF-09/10 overstates the incremental effort required to advance this concept, particularly given the availability of participant-led analytical support. Grid United is prepared to coordinate closely with WPP and SPP staff and WRAP stakeholders to execute a transparent study process that accelerates progress while maintaining technical rigor and stakeholder confidence. In our view, a participant-supported modeling effort that aligns with existing SERVIM methodologies can significantly reduce staff burden and shorten development timelines, allowing this important concept to advance without detracting from higher-priority binding season preparations.

#### **07. Please supply any comments on Section 4. Proposed Schedule and Plan of Action**

Grid United appreciates and strongly supports the PRC's stated commitment to flexibility in the Draft 2026 Workplan, including its recognition that while Concept Prioritization should remain the foundation of the Workplan, the PRC should retain discretion to respond to special circumstances such as shifts in priorities, staffing availability, or workstream readiness. We are encouraged by this approach and view it as particularly relevant to 2025-CRF-09/10 because it was initially voted as the second top priority for 2026. Should the proposed white paper and associated analytical work result in a clear, well-supported preliminary policy proposal with broad stakeholder alignment, Grid United respectfully requests that the PRC consider using this built-in flexibility to reassess the timing and priority of this effort. Doing so would be consistent with the Workplan's stated intent and would allow the PRC to advance a mature, high-value policy outcome without disrupting near-term binding-season readiness.

**General Comment**

Grid United respectfully submits the following comments on the Draft PRC 2026 Workplan. We appreciate the significant effort undertaken by the PRC, WPP staff, and RAPC to align the Workplan with participant needs as the WRAP prepares for its first binding Forward Showing deadline of March 31, 2027, for Winter 2027–2028. The Draft Workplan reflects a thoughtful balancing of ambition, staff bandwidth, and participant readiness during a critical program transition.

AWEC (Sommer Moser – sommer@pepplemoser.com)

**01. Please supply any comments on the draft Task Force Schedule found in Figure 5 (Schedule III)**

AWEC finds that the Task Force Schedule is appropriate and in particular supports inclusion of concepts AWS/PAC - 14/19 (Data Center/Large Loads) in the 2026 Draft Workplan beginning July 2026. Given the growth of large loads in utility service territories who are participating or plan to participate in WRAP, addressing the appropriate treatment of these large loads is both critical and timely. WRAP participants are making decisions today on resources necessary to meet capacity requirements, and any further delay in addressing the appropriate treatment of non-conforming loads only risks potential over-procurement of resources to the detriment of ultimate ratepayers who will be responsible for these costs.

**02. Please supply any comments on Concepts that would provide valuable clarification ahead of the March 31st, 2027, Forward Showing Deadline for the first Binding Season of Winter 2027-2028**

Consistent with AWEC's response to Question 1, consideration of changes necessary to address the unique nature of non-conforming loads is necessary well in advance of the March 31, 2027 Forward Showing Deadline because resource acquisitions will need to be made well in advance of this deadline in order for a Participant to meet Forward Showing obligations. Over procurement of capacity and/or the failure to recognize the resource adequacy benefits that some non-conforming loads offer will serve to unnecessarily increase costs to retail consumers and may chill retail customer investment in, and reliance on, co-located and/or behind-the-meter resources. Because utilities and their end-use consumers are making resource procurement decisions now, time is of the essence to address WRAP's treatment of non-conforming loads.

**08. Please supply any comments on Appendix A - Change Request Form Compilation**

Regarding 2025-CRF-015, AWEC supports Amazon's requests for clear requirements on load exclusion, including how that standard applies for loads with dedicated backup generation or energy storage systems. AWEC agrees that ensuring the option of load exclusion for loads with dedicated backup generation or energy storage systems will serve to promote reliability both now and in the future. Regarding 2025-CRF-019, AWEC supports PacifiCorp's proposal to consider the appropriateness of separate treatment for large non-conforming loads, including whether such loads should be assessed an alternative planning reserve margin given their lack of (or lower) contribution to system peak. AWEC also supports exploration of options to exclude of loads with curtailment provisions from a

Participant’s Forward Showing as well as options to adjust Forward Showing requirements for loads with co-located resources, including behind-the-meter resources, by treating them as demand response or excluding them from a Participant’s Forward Showing.

**General Comment**

The Alliance of Western Energy Consumers (“AWEC”) is a trade organization whose members include many of the Pacific Northwest’s largest employers and consumers of electricity and natural gas. AWEC’s members are responsible for providing tens of thousands of highly paid, technical, family-wage jobs across a broad range of industry sectors such as agriculture, aeronautics, air products, metals, pulp and paper, and more. As such, AWEC’s members provide significant economic benefits to the communities in which they are located. Many of AWEC’s members’ host utilities are committed to going binding in Winter 2027 or are themselves customers of Bonneville Power Administration who will participate on their behalf. As such, AWEC’s members are retail consumers who bear the costs and will receive the benefits of WRAP participation. AWEC supports a robust resource adequacy program to ensure reliability in the Pacific Northwest and beyond, particularly given the evolving energy landscape. AWEC is also a proponent of ensuring that resource procurement, and ultimately cost allocation, are driven by the principle of cost causation and preserving customer choice when doing so will result in efficient rates and reliable service.

Committee of State Representatives (Elliot Nethercutt –  
enethercutt@westernenergyboard.org)

**General Comment**

**To:** WRAP Program Review Committee

**From:** Committee of State Representatives

**Date:** April 15, 2026

**RE:** COSR Comments on the Western Resource Adequacy Program 2026 Draft PRC Workplan

Dear Program Review Committee Members:

Thank you for the opportunity to review the Western Resource Adequacy Program's (WRAP) 2026 Draft PRC Workplan (1), as developed by the Program Review Committee (PRC), with input from the Resource Adequacy Participants Committee (RAPC) and posted for comment on March 13, 2026. The Committee of State Representatives (COSR) recognizes the significant level of effort and collaboration required to develop this Workplan over the past three months. In accordance with the WRAP's *Business Practice Manual (BPM) 301 – PRC Workplan Development and Approval* (2), the COSR and other stakeholders are granted an opportunity to provide comments and recommended design changes to the WRAP, including the annual Workplan. Our comments are as follows: (3)

Following multiple reviews and discussions of the PRC 2026 Workplan, the Committee of State Representatives (COSR) supports the proposed prioritization and sequencing of significant issues that will affect the WRAP. Specifically, a robust resource adequacy framework would benefit from policies that account for the rapid emergence of large, non-conforming, high-load-factor resources across the West (Concepts 14/19). Initiating a Task Force in 2026 will enable participants to more quickly develop an improved understanding of how these large loads may affect resource procurement decisions and load obligations in advance of the March 31, 2027 Forward Showing (FS) deadline. The COSR also welcomes the Workplan's development of a whitepaper later this year to explore the initial scope and indicative policy direction for Regional Transmission Capacity, prior to the formation of the Task Force and full modeling efforts in 2027 (Concepts 09/10). Assessing regional transmission could promote an improved understanding of potential transfers that would otherwise not exist, potentially lowering planning reserve margins (PRMs) in the WRAP regions by leveraging new interchange import capacity. Similarly, the COSR supports future efforts to examine certain

transmission lines for potential inclusion as a qualifying resource with attributed capacity values sufficient for inclusion in a participant’s FS Capacity Requirement.

The COSR further acknowledges the Program Administrator’s efforts, consistent with BPM 301, to account for the time and resource demands placed on WRAP participants and Western Power Pool (WPP) staff in executing the proposed 2026 Concepts, as well as the remaining 2025 Workplan Concepts. The proposed Workplan appropriately leverages multiple short-term implementation pathways outside of traditional workstreams (e.g., Non-Task Force Proposals (NTFP), expedited workstreams, and whitepapers) to advance critical program enhancements ahead of the first Binding Season. The COSR agrees that certain initiatives, including the WRAP E-Tags and Inter-Participant Joint Contract Accreditation Form (JCAFs) proposals, can be addressed on a shorter timeline and ultimately reduce administrative burden for participants.

Recognizing the amount of work to be completed within a short timeframe, the COSR values continued updates, especially related to the Day-Ahead Market Optimization and Deficiency Deferral efforts. Developing an advanced understanding of these important and complex enhancements will enable the COSR to provide well-informed comments. The COSR would also appreciate further clarification regarding the procedural impacts of various 2025 and 2026 Workplan Concepts to be completed in 2026 (i.e., which Concepts will require BPM updates and/or tariff changes). Ultimately, the COSR supports the 2026 Workplan’s approach and views it as a pragmatic means of addressing priority issues, given the limited time and resources.

*Following a vote at the COSR monthly meeting on March 27, 2027, the Committee endorsed these comments by a majority of the current members. The COSR appreciates the continued efforts of the PRC, the RAPC, and WPP staff to prioritize and implement program enhancements.*

Respectfully,

The Committee of State Representatives

**Chris Parker**

Chair, Committee of State Representatives  
Director, Utah Division of Public Utilities

**Brian Rybarik**

Vice Chair, Committee of State  
Representatives  
Chairman, Washington Utilities and  
Transportation Commission

**01. Please supply any comments on the draft Task Force Schedule found in Figure 5 (Schedule III)**

APS appreciates the discretion and flexibility exercised by the PRC and WPP in developing the 2026 Workplan Schedule III. In particular, APS found the sequencing reflected in Schedule III to be responsive to participant feedback provided through RAPC discussions, especially with respect to prioritizing concepts that support readiness for the first binding Forward Showing. APS supports the approach of limiting the schedule to two concurrent PRC workstreams, which appropriately balances progress on critical policy issues with stakeholder and WPP staff bandwidth constraints. The incorporation of buffers and alternative development paths (i.e. scoped white papers and non-task-force proposals) is a pragmatic recognition of implementation risk and uncertainty. Overall, Schedule III reflects a thoughtful integration of prioritization, level-of-effort realities, and participant needs.

**02. Please supply any comments on Concepts that would provide valuable clarification ahead of the March 31st, 2027, Forward Showing Deadline for the first Binding Season of Winter 2027-2028**

APS believes the following concepts would provide the most value in advance of the March 31, 2027 Forward Showing deadline for the first binding Season (Winter 2027–2028): • Day-Ahead Market Optimization • Effective Load Carrying Capability (ELCC) approach • Forward Showing Deficiency Deferral Resolution • Participant-to-Participant Joint Capacity Accreditation Forms (JCAFs) APS supports the draft Workplan as presented under Schedule III, which appropriately positions each of these items for completion, clarification or meaningful progress ahead of the Forward Showing deadline. Advancing these concepts on the proposed timeline will materially improve participant certainty and support successful execution of WRAP during the first binding period.

**General Comment**

APS supports adoption of the 2026 PRC Workplan as drafted. The Workplan reflects a balanced approach that prioritizes participant readiness for the first binding WRAP Forward Showing while acknowledging practical implementation constraints. APS appreciates the continued collaboration among WPP, PRC, RAPC and other stakeholders and looks forward to productive engagement through the upcoming Task Forces and proposal development efforts.

## Bonneville Power Administration (mchayes@bpa.gov)

### **General Comment**

Bonneville appreciates the opportunity to comment on this workplan, and for all the coordination and effort put in by the WPP, WRAP members, and stakeholders in compiling this workplan.

Bonneville supports this workplan, but does have a few minor comments for consideration:

1. Including all previous revisions in the current draft of the workplan makes for a cluttered read. Bonneville suggests retaining these versions for reference, but only including the latest draft when sending out for comment
2. We would like to recognize the volume of high priority issues brought to the PRC as participants head towards the first binding season and recognize that this plan and the priorities approved in it may not meet every participant's needs prior to the program going binding. Participants may need to bring NTFP's forward to resolve issues that were not prioritized, or for issues that got prioritized later then needed to address issues impacting compliance with the binding program. NTFP consideration should not be delayed because the issue is scheduled to be addressed via a task force later in the PRC workplan. An influx of NTFP's will have an impact on WPP Staff time, as well as participants and PRC review efforts.

## Appendix G – WPP Board Meeting Jun. 4<sup>th</sup>, 2026

[Minutes to be posted when approved at Q3 Board Meeting September 30, 2026]