

Western Resource Adequacy Program
Committee of State Representatives

2026 Business Plan and Budget

November 07, 2025

Approved by:
Appointed Members of the
Committee of State Representatives

1600 Broadway, Suite 1020

Denver, CO 80202

720-897-4600

www.westernenergyboard.org

Table of Contents

Introduction.....	3
Organizational Overview	4
Membership and Governance	6
Recent Activities and 2026 Strategic Priorities and Goals.....	7
2026 Budget and Assumptions.....	8
Working Capital Reserve and Funding Requirement	11
Budget Projections for 2027 and 2028.....	12

Introduction

The Western Resource Adequacy Program (WRAP) Committee of State Representatives' (COSR) proposed budget for 2026 is \$235,400. The budget is based upon employment of 1.15 full-time equivalent (FTE) employees, consisting of six (6) Western Interstate Energy Board (WIEB) staff in 2026. The following table summarizes the proposed COSR budget for calendar year 2026:

Table 1. COSR Budget for 2026

Total Resources	2026
Total FTEs	1.15
Total Expenses	\$ 235,400
Targeted Working Capital Reserve	\$ 58,850
Total Funding Requirement	\$ 294,250
Projected Working Capital Reserve	\$ 67,636
Increase or (Decrease) to Achieve Desired Worki	\$ (8,786)
2026 Funding Requirement	\$ 226,614
Less: 2026 Other Income	\$ -
Total 2026 Funding Assessment	\$ 226,614

The COSR funding assessment is allocated to State-Regulated WRAP Participants (SRWPs) using the following methodology as specific in the SRWP contract:

- 1) Determine SRWP's load for each applicable state (i.e., each state where the SRWP serves load that is subject to WRAP) using the most recent publicly available EIA data.
- 2) For each state, add up the total WRAP load (which may be comprised of one or more SRWPs).
- 3) A limit is set to distinguish between small and large load states using a 10,000,000 MWh threshold.
- 4) If a state's total WRAP load is above the threshold, it is assigned an equal proportion of the total WIEB expense based on the total number of WRAP states (e.g., if there are ten WRAP states, the large load state receives one-tenth of the total expense).

- 5) If a state's total WRAP load is below the threshold, it is assigned half the proportion of the total expense compared to large load states (e.g., if there are ten WRAP states, the small load state receives one-twentieth of the total expense).
- 6) This allocation method leaves a residual amount of total expense that is then assigned equally to the large load states.
- 7) Each SRWP's load in each state is then assigned a proportion of the total state allocation according to that SRWP's respective share of that state's WRAP load.
- 8) Each SRWP's total expense share by state is then added together to get each SRWP's compensation share of the total expense.

The following table summarizes the adjusted funding allocation by state for 2026:

Table 2. COSR Funding Allocation by State for 2026

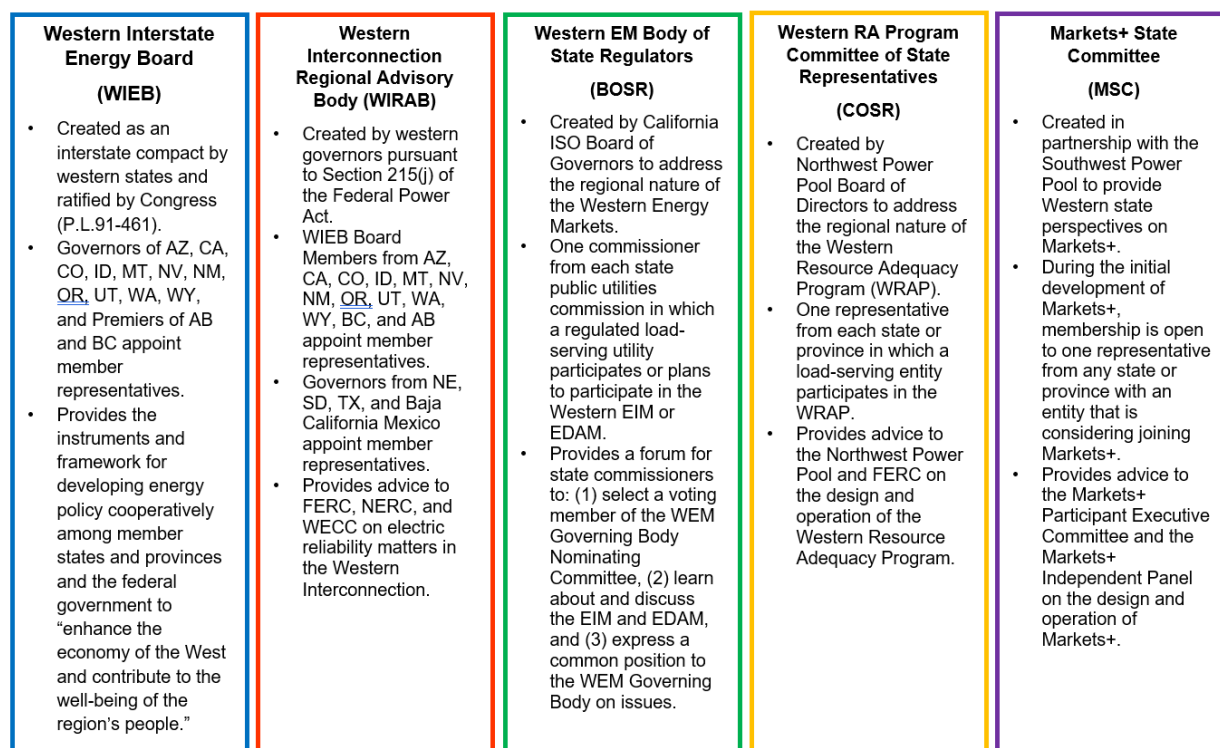
State	2026 Funding Assessment
Arizona	\$30,215.20
California	\$11,330.70
Idaho	\$30,215.20
Montana	\$11,330.70
Nevada	\$30,215.20
New Mexico	\$11,330.70
Oregon	\$30,215.20
Utah	\$30,215.20
Washington	\$30,215.20
Wyoming	\$11,330.70
Total	\$226,614.00

Organizational Overview

The COSR is a standing committee of WRAP, a first-of-its-kind reliability program in the West administered by the Western Power Pool (WPP). The WRAP tariff was approved by the Federal Energy Regulatory Commission (FERC) at the beginning of 2023, and the COSR was established soon after in April 2023 in accordance with the WRAP Bylaws. The COSR aims to support state and provincial engagement in WRAP activities and share perspectives on pertinent

program matters with WRAP participants and other stakeholders. The COSR provides advice to the WPP Board of Directors, Program Review Committee (PRC), Resource Adequacy Participants Committee (RAPC), any associated working groups and task forces, and FERC on matters related to WRAP governance, program design, and operations.

The COSR has chosen to rely on the Western Interstate Energy Board (WIEB) as the vehicle to obtain independent staff support. WIEB was founded in 1970 pursuant to the Western Interstate Nuclear Compact, P.L. 91-461. WIEB provides the instruments and framework for developing energy policy cooperatively among member states and provinces and the federal government to enhance the economy of the West. WIEB currently shares staff resources with five (5) other regional committees: The Committee on Regional Electric Power Cooperation (CREPC), the High-Level Radioactive Waste Committee (HLRWC), the Western Interconnection Regional Advisory Body (WIRAB), the Western Energy Markets Body of State Regulators (BOSR), and the Markets+ State Committee (MSC). The CREPC was established in 1982 as a joint committee of WIEB and the Western Conference of Public Service Commissioners (WCPSC) to focus on electric power system policy issues that require regional cooperation in the West. The HLRWC was established in the 1980s to provide state perspectives on emerging issues surrounding the Nation's nuclear waste program with a focus on the transportation of spent nuclear fuel and high-level radioactive waste. The WIRAB was established by FERC in 2006 upon petition of the Western Governors to advise on matters pertaining to electric grid reliability in the Western Interconnection. The BOSR was established in 2015 as part of a governance proposal adopted by the California Independent System Operator (CAISO) Board of Governors to address the regional nature of its energy market and support state engagement in CAISO developments. The MSC was established in April 2023 to support state engagement in the Markets+ development, a real-time and day-ahead wholesale electricity market offering for the West administered and operated by the Southwest Power Pool (SPP). WIEB, CREPC, HLRWC, WIRAB, BOSR, MSC, and COSR are independent sister organizations that share operational resources but maintain independent governance, decision-making, and funding. The following chart illustrates the organizational relationships:

Figure 1. Organizational Relationships

Membership and Governance

The COSR is composed of one representative from each state or provincial jurisdiction that regulates at least one (1) WRAP Participant. State and provincial representatives are nominated by the Chair or President of their respective public utility commission and may include representatives from the state or provincial energy offices or state- or provincial-funded consumer advocates. The following table illustrates the current COSR members and their respective agencies:

Table 3. COSR Membership List

State	Representative	Title and Agency
Arizona	Nick Myers	Commissioner, Arizona Corporation Commission
California	Alice Reynolds	President, California Public Utilities Commission
Idaho	Dayn Hardie	Commissioner, Idaho Public Utilities Commission
Montana	Vacant	
Nevada	Tammy Cordova	Commissioner, Public Utilities Commission of Nevada
New Mexico	Vacant	
Oregon	Letha Tawney**	Chair, Oregon Public Utility Commission
Utah	Chris Parker*	Director, Utah Division of Public Utilities
Washington	Brian Rybarik	Chairman, Washington Utilities and Transportation Commission
Wyoming	Chris Petrie	Deputy Chairman, Wyoming Public Service Commission

* Chair

** Vice Chair

Recent Activities and 2026 Strategic Priorities and Goals

Following the announcement of the delay to the first WRAP binding season in 2024, COSR actively engaged in the stakeholder process to overcome challenges raised by Participants in the Revised Transition Plan (RTP). Part of this engagement included a joint meeting with the Resource Adequacy Participants Committee (RAPC) to address the COSR's concern over the participant data being made available to WPP and the completion of participant workbooks. COSR Staff worked with COSR Leadership to develop a template for individual COSR members to use when requesting information from their respective State-Regulated WRAP Participants (SRWPs) to better understand their participant in WRAP and the barriers, if any, to participation in the binding program.

The COSR also participated in the Program Review Committee (PRC) development of its 2025-2026 workplan. COSR Staff reviewed the draft PRC Workplan with the COSR and has continued to monitor and provide updates to COSR members on three (3) new WRAP Task Forces created to work on Day-Ahead Markets, CAISO Transmission, and the Planning Reserve Margin (PRM). This work will continue through 2026, and COSR Staff will remain engaged through the task forces' lifespans.

Recently, some WRAP participants have been focused on decision-making ahead of the October 31, 2025, deadline for providing the program with notice of a participant's intention not to go binding in Winter 2027/2028. COSR staff have kept members informed and provided a forum for states to engage as desired. The default expectation for participants who provide notice is two years of continued non-binding program participation, and COSR expects to remain engaged across all program participants.

Regardless of exit notices, with a critical mass of binding participants WRAP will continue its development to go-live and binding operations, making consistent and informed regulator engagement on WRAP programmatic development crucial to enhancing reliability in the West. To best enable that engagement throughout 2026, COSR aims to work with its staff to:

- Advance the education and understanding among Western commissioners of WRAP initiatives and WRAP coordination with the emerging wholesale electricity markets and other regional and/or localized resource adequacy programs.

- Facilitate COSR input into the WRAP Task Forces, educating members on task force development, issue and proposal scoping, and related stakeholder engagement and collaboration.
- Provide a forum for discussion and opportunities to form a common state/provincial perspective on issues relating to reliability and resource adequacy, including but not limited to:
 - Organizing at least two (2) in-person COSR meetings,
 - Holding virtual monthly COSR meetings,
 - Facilitating COSR-created task forces, as necessary, and
 - Organizing other workshops or webinars, as necessary.
- Support the COSR's engagement in relevant WRAP processes by:
 - Tracking, reporting, and participating in stakeholder- and WPP-led initiatives relevant to COSR member interest(s), including those that relate to policy, program design, reliability, or governance,
 - Arranging and/or providing briefings and training on policy-oriented and technical WRAP matters, such as technical program enhancements or other developments in the resource adequacy space that may impact WRAP operations,
 - Developing internal expertise, either through COSR staff or consultant support, to better engage the COSR members in conversation with WRAP Participants, WRAP stakeholders, WPP, and the WPP Board of Directors, and
 - Facilitating COSR consideration and uptake of consensus positions relevant to WRAP initiatives or other regional activities that may impact WRAP operations.
- Engage with other key organizations and partners in the West, such as BOSR, MSC, and WIRAB, as well as WRAP Participants and stakeholders, regulators and policymakers from other regions, and FERC on pertinent program matters including but not limited to seams management, regional resource adequacy outlook(s), and expanded programmatic data analysis.

2026 Budget and Assumptions

The COSR's proposed budget for 2026 is \$235,400, an increase of \$8,600 (3.8%) from 2025.

The budget is based upon employment of 1.15 FTE in 2026, at a direct labor expense of

\$104,143 and an indirect expense of \$100,800. This is an increase of 10.9% and 13%, respectively, to address cost-of-living adjustments and increased staff support required to respond to developing and ongoing WRAP initiatives. The 2026 COSR budget is based on the following key assumptions:

- The COSR will hold regular monthly business meetings to address ongoing WRAP initiatives and program development.
- The COSR will organize and sponsor webinars and workshops on key WRAP issues for state and provincial representatives, industry personnel, and other interested stakeholders.
- A COSR representative will participate in WPP Board of Directors meetings.
- A COSR representative will participate in PRC and RAPC meetings. A COSR staff member will be appointed to monitor RAPC meetings in Executive Session, in accordance with a signed non-disclosure agreement.
- COSR members will participate in other WRAP-stakeholder meetings and workshops on relevant topics.
- The COSR will monitor WRAP PRC Task Forces as they arise, including the current task forces on Day-Ahead Markets, CAISO Transmission, and the Planning Reserve Margin (PRM) and engage with task force membership as necessary to advance the discussion and seek resolution.

Personnel and Indirect Expenses

Personnel expenses in the COSR's budget total to \$104,143 for a total of 1.15 FTE. The FTE breakdown is allocated to 0.10 FTE to the Executive Director, 0.05 to the Deputy Director, 0.10 to the Director of State, Federal, and International Affairs, 0.45 to the Program Associate – Markets and Resource Adequacy, 0.40 to the Markets and Resource Adequacy Analyst, and 0.05 to the Events and Communications Manager. WIEB uses a single rate method for indirect expenses. The indirect expenses include office expenses, medical and retirement expenses, as well as holiday, vacation, and sick leave for COSR staff. The indirect rate is a percentage of the direct labor expense associated with COSR activities. The indirect rate is 96.8% in the 2026 budget, an increase of 1.8% from 2025 as a result of an increase in WIEB FTEs in fiscal year 2026.

Table 4. Personnel and Indirect Expense Analysis, 2025 & 2026

Personnel and Indirect Expense Analysis					
Description	Budget 2025	Budget 2026	Variance \$	Variance %	
Salary Expense	\$ 93,900	\$ 104,143	\$ 10,243	10.91%	
FTEs	1.05	1.15	0.10	9.52%	
Cost per FTE	\$ 89,429	\$ 90,559	\$ 1,131	1.26%	
Indirect Rate	95.0%	96.8%	1.8%	1.89%	
Indirect Expense	\$ 89,200	\$ 100,800	\$ 11,600	13.00%	
FTEs	1.05	1.15	0.10	9.52%	
Cost per FTE	\$ 84,952	\$ 87,652	\$ 2,700	3.18%	

Meeting Expense

Meeting expenses remain flat at \$10,000 in 2026. The COSR holds two in-person meetings per year that include participation by state representatives. In 2026, the COSR will hold two in-person meetings, one in Spring 2026 and another in Fall 2026. Whenever feasible, COSR meetings will be coordinated with other meetings of the Western states and provinces. The COSR also conducts monthly conference calls to update members on current activities and to develop positions on related issues, as well as other relevant Western market and governance related matters.

Travel Expense

Travel costs total \$18,000 in 2026, a \$13,200 (42.3%) decrease from 2025. It is estimated that COSR members will make up to six (6) trips, as needed, to attend in-person meetings, training, and other appropriate in-person meetings that relate to COSR activities, which account for \$9,000. COSR staff will make up to six (6) trips to attend in-person meetings, which account for \$9,000 in travel expenses.

Consultants and Training

In 2026, the budget does not include funding for consulting expenses. It is anticipated that in 2027 consulting support will be required and is estimated at a funding level of \$50,000 for

continued COSR development and technical expertise with market mechanisms and concepts. Staff training in 2026 remains flat at \$2,500, to further develop internal technical expertise.

Working Capital Reserve and Funding Requirement

The 2026 COSR funding requirement is \$226,614, a decrease of \$11,526 (4.8%) from 2025. The slight decrease in this year's funding assessment reflects the ongoing stabilization of the budget and reserves following last year's inaugural working capital reserve allocation. This represents a normal fluctuation as we transition from the first-year budget to a sustained, second year allocation. The 2026 target working capital reserve is \$58,850 or twenty-five percent (25%) of the budget. In 2025, the initial target working capital reserve was \$11,340, or five percent (5%) of the budget. The COSR has determined that an increase from 5% to 25% is an appropriate second year working capital reserve target for 2026 as operations shift from first year immediate short-term projections, to a more data driven long-term approach for future goals and needs. The level of reserves will continue to be based on actual year-to-date spending in future budget periods. Reserves are intended to provide for unexpected expenses or losses. The reserve policy will be reviewed in future years when budget risks can be more clearly identified. The adjustment to the funding requirement to meet the desired level of reserves is the mechanism by which the COSR will ensure that budget surpluses in any given budget year will be used to reduce the funding requirement in the subsequent budget year. The following table provides the 2026 working capital reserve analysis:

Table 5. Working Capital Reserve Analysis, 2026

COSR - Working Capital Reserve Analysis 2026	
Beginning Working Capital Reserve (Deficit), December 31, 2024	40,996
Plus: 2025 Funding (from SRWPs)	238,140
Plus: 2025 Other funding sources	0
Minus: 2025 Projected expenses & capital expenditures	211,500
Projected Working Capital Reserve (Deficit), December 31, 2025	67,636
Targeted Working Capital Reserve, December 31, 2026	58,850
Minus: Projected Working Capital Reserve, December 31, 2025	67,636
Increase(decrease) in funding requirement to achieve Working Capital Reserve	(8,786)
2026 Expenses and Capital Expenditures	235,400
Less: Other Funding Sources	0
Adjustment: To achieve desired Working Capital Reserve	(8,786)
2026 COSR Assessment	226,614

Budget Projections for 2027 and 2028

The COSR projects a one-time budget increase of 25.1% in 2027 as a necessary adjustment to add ongoing funding for contractual support, similar to the contractual support other WIEB committees have generally included in their budgets; this is a direct result of the committee's strategic restructuring to right-size and enhance its capacity and effectiveness. Contractual support for the COSR was secured in 2025 through available WIEB funding outside of the COSR budget, which is set to expire in 2026.

In 2028, the COSR projects the return to a modest budget increase of 3.2% to account for normal inflation and labor increases. These increases are consistent amongst the regional committees supported by WIEB. The following table provides projections for the 2027 and 2028 budgets and changes in working capital:

Table 6. Projections of the 2026, 2027, and 2028 Budgets and Change in Working Capital

Statement of Activities and Change in Working Capital 2026, 2027, and 2028 Budget Projections							
	2026	2027	Variance 2027 Projection v 2026 Budget		2028	Variance 2028 Projection v 2027 Budget	
	Budget	Projection	Over(Under)	% Change	Projection	Over(Under)	% Change
Funding							
COSR Funding							
Assessments	\$ 226,614	\$ 250,480	\$ 23,866	10.5%	\$ 304,575	\$ 54,095	21.6%
	-	-	-		-	-	
Total Funding (A)	\$ 226,614	\$ 250,480	\$ 23,866	10.5%	\$ 304,575	\$ 54,095	21.6%
Expenses							
Personnel Expenses							
Direct Labor	104,143	108,300	4,157	4.0%	112,600	\$ 4,300	4.0%
Total Personnel Expenses	\$ 104,143	\$ 108,300	\$ 4,157	4.0%	\$ 112,600	\$ 4,300	4.0%
Meeting Expenses							
COSR Meetings	10,000	10,300	300		10,600	300	
State Travel	9,000	9,300	300		9,600	300	
Staff Travel	9,000	9,300	300		9,600	300	
Total Meeting Expenses	\$ 28,000	\$ 28,900	\$ 900	3.2%	\$ 29,800	\$ 900	3.1%
Operating Expenses							
Consultants & Contracts	\$ -	\$ 50,000	50,000		\$ 50,000	-	
Staff Training	2,500	2,600	100	4%	2,700	100	
Total Operating Expenses	\$ 2,500	\$ 52,600	\$ 50,100	2004.0%	\$ 52,700	\$ 100	0.2%
Total Direct Expenses	\$ 134,643	\$ 189,800	\$ 55,157	41.0%	\$ 195,100	\$ 5,300	2.8%
Indirect Expenses	\$ 100,800	\$ 104,800	\$ 4,000	4.0%	\$ 109,000	\$ 4,200	4.0%
Other Non-Operating Expenses	\$ -	\$ -	\$ -	-	\$ -	\$ -	-
TOTAL BUDGET (B)	\$ 235,443	\$ 294,600	\$ 59,157	25.1%	\$ 304,100	\$ 9,500	3.2%
CHANGE IN WORKING CAPITAL (=A - B)	\$ (8,829)	\$ (44,120)	\$ (35,291)	-	\$ 475	\$ 44,595	-
FTEs	1.15	1.15	-	0.0%	1.15	-	0.0%