

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

¹ https://www.westernpowerpool.org/private-media/documents/2026-03-13_Draft_PRC_Workplan.pdf.

² All WRAP BPMs can be found at: https://www.westernpowerpool.org/resources/wrap_bpms/.

³ These comments are not intended to pre-empt, supplant, or otherwise circumvent any state or provincial regulatory processes or determinations. As a standing committee of the WRAP, the COSR exists to provide state and provincial guidance on matters pertaining specifically to the program. Any comments provided by the COSR do not indicate individual member positions on proceedings in their respective states and should not be considered pre-judgment of any kind.

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