

October 13, 2025

To: Western Resource Adequacy Program’s Resource Adequacy Participants Committee
From: Chris Parker, Chair of the Committee of State Representatives
Letha Tawney, Vice Chair of the Committee of State Representatives
RE: Open Letter to Participants in the Western Resource Adequacy Program

As the October 31 deadline to exit the Western Resource Adequacy Program (WRAP) before the first binding period quickly approaches, we thought it important to express our views as the Chair and Vice Chair of the Committee of State Representatives (COSR). Given the short timeline, these views are our own; we intend to take these views into further discussion with the full COSR and other state representatives who are united around a common goal: maintaining electric reliability at the lowest reasonable cost across the Western Interconnection.

We reiterate our support for the promise of WRAP: to provide transparency into the resource adequacy position of our region, to fairly allocate responsibility for closing any gaps to meeting these shared resource needs, and to enable access to regional resource diversity to lower the future costs of maintaining reliability. Accountability to a common regional resource adequacy construct helps regulators understand the scale of the resource need and how it is allocated among load serving entities; this combination gives regulators shared understanding and confidence in the procurement needed across the region and for our respective utilities, even as they may pursue differing resource mixes. These benefits are even more important at a time when the region is grappling with growing loads, extreme weather is driving record peaks while impacting the performance of generators, and new reliability risks such as wildfire are emerging.¹

These benefits, we recognize, are not easy to achieve. During the non-binding phase, as participants work toward new standardized metrics, data quality has been uneven; this, in turn, limits WRAP’s ability to deliver the full picture of the region’s reliability position that states desire. Exceptional load growth projections and procurement challenges of all kinds have slowed utilities’ ability to close short positions and raised concerns around the program’s deficiency charges. Furthermore, the creation of two day-ahead markets in the West has led to evolving market footprints and introduces still more complexity and uncertainty.

¹ NERC Long Term Assessment, Updated July 15, 2025
https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_Long%20Term%20Reliability%20Assessment_2024.pdf

At this critical moment we have a core priority to share with the program, its committed participants, and those considering departure: Customers are best served by a complete and accurate understanding of regional resource adequacy across the broadest possible footprint and an organizing force to prompt utilities to take timely, coordinated action to ensure reliability.

Maintaining a broad footprint will take an express commitment from the program and all participants to make changes to mitigate risks and address the new complexity of two markets. Particularly in the face of procurement realities, equitably valuing all resources available to meet needs during high-risk hours is crucial. Many of these changes are already underway within WRAP and it will require dedicated effort from all participants to see these changes through and recognize the diversity benefits available to the larger footprint. We recognize that utilities also need regulators to understand and support the value of taking these risks and making these efforts. This letter is meant to offer our support, and to indicate our intention and commitment to working with our state colleagues to broaden that support.

Utilities must make resource commitments with imperfect information, and the upcoming decisions are no different. We recognize the cost of lost load is measured in life safety impacts and broad economic disruption. As regulators, we are aligned with utility efforts to ensure reliability in spite of uncertainty. Efforts that preserve transparency and an equitable allocation of resource gaps are particularly valuable.

Even if this month closes with a smaller binding WRAP footprint than it opened with, transparency and accountability around resource adequacy will remain our priority, and it will become imperative that work continue within WRAP and across the interconnection to capture the diversity value of the largest possible regional footprint. We stand ready to support that work.

Sincerely,

/s/ Chris Parker
Chris Parker
Chair of the Committee of State
Representatives and Director of the Utah
Division of Public Utilities

/s/Letha Tawney
Letha Tawney
Vice Chair of the Committee of State
Representatives and Chair of the Oregon
Public Utility Commission

CC: Committee of State Representatives
Western Power Pool