

May 28, 2024

**From:** Committee of State Representatives

**To:** Western Resource Adequacy Program Resource Adequacy Participants Committee (RAPC)

**RE:** Response to April 22 Letter from RAPC to Western Stakeholders

Dear Resource Adequacy Participants Committee,

The Committee of State Representatives (COSR)<sup>1</sup> appreciates your dedication to ensuring the success of the Western Resource Adequacy Program (WRAP) and regional reliability, despite the challenges described in your April 22 [letter](#) that have led participants to elect not to comply with WRAP's binding requirements in Summer 2026.

The COSR is concerned about changes in the state of reliability in the region over the past few years and agrees that these changes reaffirm the need for WRAP and for collaboration between COSR and participants. The COSR will work actively with the Resource Adequacy Participants Committee (RAPC) and Western Power Pool (WPP) to better understand the ongoing challenges and to support stakeholder efforts to ensure WRAP success. We understand that the RAPC is currently developing a tariff change proposal for a revised transition plan that identifies potential pathways to binding operations.

We offer this letter to emphasize, however, the most important underlying goal of our engagement with WRAP: to protect the public interest by ensuring the utilities in our states can reliably meet their load obligations. We expect that further time spent in the non-binding phase, as well as any changes to the requirements for binding status, will reflect WRAP's and each participant's firm commitment to improving regional reliability. The COSR recognizes that adapting to the uniform regional WRAP metrics may be a challenge in the short term, and that modifications to WRAP may be warranted. As it stands, however, participation in the WRAP is the only vehicle that currently exists for gaining a regional picture of resource adequacy. We are committed—and we expect participants to be committed—to making good on the value WRAP promises.

While we prepare for our review of the tariff change proposal as part of the WRAP governance process, we take this opportunity to outline some of our priorities and expectations.

### Data Quality

WRAP's primary value proposition during its non-binding phase is to provide visibility into resource adequacy—both regionally and for individual utilities—that cannot be achieved through review of single-utility Integrated Resource Plans. To deliver this value, participants must provide WRAP with timely, accurate, granular data about their load and resource positions, and WRAP must be able to share enough information to promote broader understanding of the reliability picture and, if needed, action to improve

---

<sup>1</sup> The Committee of State Representatives is a standing committee of the Western Resource Adequacy Program established in accordance with the WRAP Bylaws to support state and provincial engagement and share these perspectives on matters pertaining to the WRAP. For more information about the COSR, you may access the COSR charter here: <https://www.westernenergyboard.org/wp-content/uploads/WRAP-COSR-Charter.pdf>.

it. Without this commitment to data quality, some may question whether the value of a longer non-binding phase is commensurate with its cost. The COSR intends to work with the RAPC and WPP to identify areas where submission of participant data needs to improve (e.g., better quality, additional detail, more transparency) to meet WRAP requirements and, ideally, provide a clearer analysis of regional challenges to binding participation.

Access to accurate and comprehensive data both within our individual states and WRAP is essential for making informed assessments and planning for future needs. In pursuit of these goals, COSR members will be formally requesting WRAP Participants work with WPP to provide regulators with data relevant to the WRAP Participants in their respective states. With such information and open dialogue between COSR members, WPP, and the State-Regulated WRAP Participants (SRWPs), COSR members can gain a more comprehensive understanding of the resource adequacy position of our regulated entities and make more effective decisions within our states and as a region to support our goals of reliability and WRAP success.

The COSR recognizes the need to protect commercially sensitive data and will take reasonable precautions to protect this information and ensure all data acquired is used responsibly and in compliance with the WRAP tariff and any entity's specific privacy agreements. At the same time, we would like to work with WPP and the RAPC to improve the flow of useful public information from the WRAP.

#### Changes to Binding Provisions

For a voluntary program to deliver wide regional visibility and improve resource adequacy at the lowest aggregate cost, WRAP needs to promote participation by as much of the West's load as possible. Participants' binding commitments are essential to avoid free ridership and enable all Participants to benefit from WRAP during load excursions and other extreme events. We understand from your April 22 letter that short-term challenges with securing the supply and associated transmission to meet WRAP's standards prevented a critical mass from going binding in 2026 and may necessitate to standards and charges to enable that critical mass in the future. As the RAPC considers those changes, we encourage RAPC to continue to strive to balance risk and value for all participants.

We appreciate your attention to these issues, and we look forward to future collaboration with the RAPC, WPP, and other stakeholders and reviewing the RAPC's proposal in the days and months ahead.

Respectfully,  
The Committee of State Representatives  
(*signatures continue on next page*)

**Tammy Cordova**  
Chair, Committee of State Representatives  
Commissioner, Nevada Public Utilities  
Commission

**Chris Parker**  
Vice Chair, Committee of State  
Representatives  
Director, Utah Division of Public Utilities

**Arizona**

Nick Myers  
Commissioner, Arizona Corporation  
Commission

**New Mexico**

Jim Ellison  
Commissioner, New Mexico Public  
Regulation Commission

**California**

Darcie Houck  
Commissioner, California Public Utilities  
Commission

**Oregon**

Megan Decker  
Chair, Oregon Public Utility Commission

**Idaho**

John Hammond  
Commissioner, Idaho Public Utilities  
Commission

**Washington**

Dave Danner  
Chair, Washington Utilities and  
Transportation Commission

**Montana**

James Brown  
President, Montana Public Service  
Commission

**Wyoming**

Chris Petrie  
Commission, Wyoming Public Service  
Commission

CC: Jeff Guldner, Arizona Public Service  
Dennis Vermillion, Avista  
Sean Fallmer, Calpine Energy Solutions  
Lisa Grow, Idaho Power  
Brian Bird, NorthWestern  
Doug Cannon, NV Energy  
Cindy Crane, PacifiCorp  
Maria Pope, Portland General  
Pat Vincent-Collawn, PNM  
Mary Kipp, Puget Sound Energy  
Wael Sawan, Shell  
Sarah Edmonds, Western Power Pool