

Committee of State Representatives

September 25, 2026

Agenda

1. Chair's Welcome & Roll Call – Chris Parker, COSR Chair
2. RAAG / EDAM RA Updates – Robin Arnold, WIEB
3. General WRAP Updates – Elliott Nethercutt, WIEB
 - a. WRAP Membership
 - b. Colorado Addition to COSR
 - c. 2027 COSR Business Plan & Budget
4. COSR Business – Chris Parker, COSR Chair
 - a. COSR Comments for Capacity Critical Hours (CCH) by Subregion*
 - b. COSR Comments for Deficiency Charge Deferral Resolution*
5. Active WRAP Proposals & Policy Development Updates – Elliott Nethercutt, WIEB
 - a. Contingency Reserves Policy (2026-NTFP-07)
 - b. Day-Ahead Market Task Force Proposal
 - c. BPM 110: Cost of New Entry
 - d. Deficiency Charge Calculation (2026-NTFP-08)
6. Upcoming Meetings & Important Dates – Elliott Nethercutt, WIEB
7. Adjourn

* **Action Items** for this meeting.

1. Chair's Welcome & Roll Call

2. RAAG / EDAM RA Updates

3. General WRAP Updates

General WRAP Updates

WRAP Membership

Participant	Regulatory Oversight	WRAP Subregion	Signed WRAPA?	Effective Date
Public Service Company of Colorado (PSCo)	Colorado	Rockies	Yes	September 15, 2026
CORE Electric Cooperative	N/A	Rockies	Yes	January 1, 2027
Freeport-McMoRan	Arizona	SWEDE	Yes	January 1, 2027

WRAPA signed in September

General WRAP Updates

Colorado Addition to COSR

Welcome to Eric Blank, Chair, Colorado Public Utilities Commission!

State/Province	COSR Representative	Title Agency
Arizona	Nick Meyers	Commissioner, Arizona Corporation Commission
California	Darcie Houck	Commissioner, California Public Utilities Commission
Colorado	Eric Blank	Chair, Colorado Public Utilities Commission
Idaho	Dayn Hardie	Commissioner, Idaho Public Utilities Commission
Montana	Vacant	
Nevada	Tammy Cordoba	Commissioner, Public Utilities Commission of Nevada
New Mexico	Pat O'Connell	Chair, New Mexico Public Regulation Commission
Oregon	Letha Tawney	Chair, Oregon Public Utility Commission
Utah	Chris Parker	Director, Utah Division of Public Utilities*
Washington	Brian Rybarik	Chair, Washington Utilities and Transportation Commission**
Wyoming	Chris Petrie	Deputy Chairman, Wyoming Public Service Commission

*Chair

**Vice Chair

4. COSR Business

COSR Business

Capacity Critical Hours (CCH) by Subregion

Impacts of the Proposal

- Modeling shift for determining CCH:
 - Current: single set for the entire WRAP footprint
 - Proposed: based on aggregate load and applicable resource outputs for each subregion
- Alignment with the subregional framework used for other assessments and resource adequacy modeling.
- Replaces Regional Interchange Adjustment with a broader "Additional Adjustments" framework that includes:
 - Regional interchange
 - Scarcity impacts (as reflected by price)
 - Other factors that materially affect CCH

COSR Business

COSR Comments for Capacity Critical Hours (CCH) by Subregion

Summary of Key Points

- Supports the proposed subregional Capacity Critical Hours (CCH) methodology as a more accurate and regionally representative approach that better reflects localized reliability conditions, transmission constraints, and capacity availability across the expanding WRAP footprint.
- Encourages evaluation of the proposal alongside other accreditation reforms, particularly the ongoing ELCC changes, to understand their combined impacts on resource accreditation and to ensure results remain transparent, predictable, and aligned with reliability objectives.
- Supports greater clarity and transparency around the proposed "Additional Adjustments" framework, **outlining how future changes to the framework or its underlying assumptions will be communicated to stakeholders, given the important impacts related to the determination of CCH.**

COSR Business

COSR Vote

Motion: Approval to Submit COSR Comment Letter Regarding
Capacity Critical Hours (CCH) by Subregion (2026-EP-05)

Approved

WRAP-COSR Charter

Each member state or province has one vote.

Action taken by the COSR shall require the affirmative vote of a majority of its members.

COSR aims to represent the collective interests of its member states and provinces and strives for consensus positions when speaking to the WPP Board and to FERC.

COSR Business

Deficiency Charge Deferral Resolution

Impacts of the Proposal

- Introduces a Deficiency Charge Deferral mechanism during the WRAP Transition Period:
 - Eligible participants that fail their Forward Showing and do not resolve the deficiency by the end of the 60-day Cure period can defer most of the deficiency charges.
 - Eligibility requires: 1. verification that the participant's Forward Showing information was accurate and complete; and 2. an attestation that the participant made "commercially reasonable efforts" to procure capacity, including market solicitation (such as an RFP) and outreach to other program participants.
- Participants that use the deferral mechanism will retain accountability and procurement incentives through a graduated payment structure:
 - A participant will pay 15% upon enrollment, with the total amount ultimately owed depending on how quickly they pass a future Forward Showing of the same season type (*i.e.*, current winter to following winter): 40% if they pass by the second opportunity, 70% by the third, and 100% if they never pass within the deferral period or leave program without resolution.
 - The graduated partial charges are in addition to the Transition Period discounts introduced in 2025.
 - Each participant's deficiency is treated as a separate compliance obligation.
- Any deficiency-charge policy beyond the Transition Period will require WRAP stakeholder process.

COSR Business

COSR Comments for Deficiency Charge Deferral Resolution*

Impacts of the Proposal

- Supports the proposal's intent to address needs for more flexibility during the Transition Period while still maintaining the program's core objectives.
- Appreciates extensive efforts by WPP and stakeholders, noting that a longer public review period for such a significant proposal may have allowed for greater engagement, evaluation, and refinement.
- Supports the proposal's core policy rationale but **recommends WPP monitor its effectiveness by developing "deferral activity reports" aggregated by subregion, to provide transparency into the frequency and outcomes of deferrals during the Transition Period.**
- Emphasizes the importance of rigorous implementation and oversight, including consistent evaluation of attestations, highlighting the administrative complexity associated with tracking deferred charges, potentially for several participants across multiple years and seasons.
- **Introduces the concept of whether deficiency charge revenues could be reinvested in qualifying capacity, transmission, or other reliability-enhancing resources to help address the underlying capacity constraints that are contributing to deficiencies.**

COSR Business

COSR Comments for Deficiency Charge Deferral Resolution*

Impacts of the Proposal

- Highlights potential revenue reductions due to delayed collection / reduced total charges collected,
- Encourages consideration of interactions with other pending WRAP policy changes, particularly potential changes to deficiency charge calculations under the proposed Cost of New Entry (CONE) methodology, which could materially affect the financial outcomes associated with the deferral percentages.

COSR Business

COSR Vote

Motion: Approval to Submit COSR Comment Letter Regarding
Deficiency Charge Deferral Resolution (2026-EP-03)

Approved

WRAP-COSR Charter

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COSR aims to represent the collective interests of its member states and provinces and strives for consensus positions when speaking to the WPP Board and to FERC.

5. Active WRAP Proposals & Policy Development Updates

Active WRAP Proposals & Policy Development Updates

Contingency Reserves Policy (2026-NTFP-07)

Purpose & Scope

- Updates WRAP's contingency reserve (CR) policy to align with the new WPP Reserve Sharing Group (RSG) methodology (effective in July 2026) following the retirement of BAL-002-WECC-3:
 - Former RSG Requirement: 6% reserves (3% load + 3% generation proxy)
 - New RSG Requirement: 200% of the prior year's average Most Severe Single Contingency (MSSC)

Impacts of the Proposal

- Allocates contingency reserve obligations to WRAP participants based on updated load responsibility, translating the RSG BA requirement to the WRAP Load Responsible Entities (LREs) using each participant's share of load.
- Applies the same CR requirement in both the Forward Showing and Operations Program (i.e., the new RSG methodology produces a single CR requirement that can be used for both programs).
- The new CR methodology applies for Summer 2028 modeling and all subsequent Binding Seasons.
- Uses the RSG contingency reserve requirement in effect at the time of each Advance Assessment.
- Using the updated CR methodology with Summer load data from the October 2025 Forward Showing, WPP demonstrated over 2,000 MW in savings.

Active WRAP Proposals & Policy Development Updates

Contingency Reserves Policy (2026-NTFP-07)

Recent Developments

- WPP determined that Board approval of this proposal must occur alongside the approval of the new Rockies Subregion PRMs, which use modeling that already incorporates this new CR methodology.
- Without Board approval of this CR policy, WPP would need to endorse new Rockies Forward Showing PRMs using the old CR policy, which is already out of date relative to actual operations.
- WPP identified potential Tariff compliance concerns with inconsistent PRM methodologies for the Rockies vs. SW / NW subregions.
- **As a result, [NTFP-07](#) will be reconstituted as an Expedited Proposal focused exclusively on essential Tariff changes, with RAPC consideration scheduled for September 28, followed immediately by WPP Board consideration on September 30.**
- Additional considerations:
 - Commitment to update the CR policy was initially proposed with significant stakeholder support in the PRM Task Force Proposal (approved by the WPP Board in March 2026).
 - The proposal committed to updating future modeling (the scope of the NTFP-07) and to propose a way to lower already-established binding Forward Showing PRMs.
 - In shifting to an expedited proposal, WPP additionally proposes making an adjustment to the Winter 27/28 Forward Showing PRMs for the NW and SW subregions to account for this update.

Active WRAP Proposals & Policy Development Updates

BPM 110 - Cost of New Entry (CONE)

Purpose & Scope

- Addresses the need for a dedicated manual describing the inputs, calculations, annual review process, and current value of CONE.
- Governs the calculation, maintenance, and annual review of the CONE, primarily used for determining Forward Showing Deficiency Charges.
- Defines CONE as the estimated annual cost of a hypothetical new peaking natural gas-fired generation facility in the Western Interconnection.
- Uses methodology that follows a traditional framework similar to those used in other capacity markets (i.e., relies on the annualized cost of a hypothetical peaking resource and incorporating capital cost, financing, depreciation, and O&M assumptions).
- Establishes an annual review process and procedures for future updates, along with a recurring mechanism to keep the value current over time.
- Provides improved transparency for stakeholders by offering the "Current CONE Value" with documented assumptions.

Active WRAP Proposals & Policy Development Updates

Day Ahead Market Task Force Proposal - 2025 PRC Workplan Task Force 04

Purpose & Scope

- The Day-Ahead Market Task Force was established in 2025 and reconvened in 2026 to evaluate opportunities and challenges associated with the emergence of Day-Ahead Markets in the West, including WRAP's planned transition to SPP Markets+ and the operational procedures that will apply during the Interim Binding Seasons (Winter 2027/28 and Summer 2028).

Impacts of the Proposal

- Aligns WRAP's Interim Seasons with the anticipated changes that will occur when Operations Program moving to SPP in Winter 2028/2029.
- Designates the Southwest & East (SWEDE) footprint as a formal WRAP Subregion with a Central Hub (Palo Verde), similar to the Northwest Subregion's use of Mid-C.
- Moves key Energy Deployment and Holdback decisions to the Preschedule Day (deadline is 15:00 PPT), eliminating the ability of deficit participants to reduce previously requested holdback energy on the Operating Day (Operating Day sharing calculations will be informational-only).

Active WRAP Proposals & Policy Development Updates

Day Ahead Market Task Force Proposal - 2025 PRC Workplan Task Force 04

Impacts of the Proposal

- Reduces operational complexity and accommodates market participation, including:
 - Revised e-tagging requirements
 - Recognition of alternative methods for demonstrating energy delivery in the SWEDE subregion
 - New provisions supporting participants operating within Markets+
- Simplifies Energy Delivery Failure rules and associated penalties (single term).
- Updates settlement provisions throughout the WRAP Tariff and BPMs:
 - Removes concepts tied to Operating Day energy declines
 - Removes the Energy Declined Settlement Price
 - Aligns settlement calculations with Preschedule Day obligations and Energy Deployments
- Removes Tariff requirement to solicit a third-party central credit organization (simplifies WRAP credit and settlement provisions).

Active WRAP Proposals & Policy Development Updates

Deficiency Charge Calculation (2026-NTFP-08)

Purpose & Scope

- The proposal seeks to eliminate outcomes that depend on the sequencing of Summer and Winter Forward Showings, improve consistency among similarly situated participants, and better align revenue distributions with the season in which the deficiencies occur.

Impacts of the Proposal

- Further revises the new WRAP Deficiency Charge framework to more clearly separate seasonal deficiency charges from annual deficiency charges.
- This distinction is important to avoid producing different outcomes depending on whether a participant's largest deficiency occurs a Summer vs. Winter Binding Season.
- Maintains seasonal monthly deficiency charges, with participants continuing to pay for deficient months in each Binding Season.
- All revenues will be distributed to participants that were non-deficient during that same season.

Active WRAP Proposals & Policy Development Updates

Deficiency Charge Calculation (2026-NTFP-08)

Impacts of the Proposal

- Establishes a single annual maximum deficiency for each Forward Showing Year, determined after both the Summer and Winter Forward Showings are complete (rather than using the current Summer-first and incremental-Winter approach).
- Applies the annual CONE-based deficiency charge to the participant's highest monthly deficiency across the entire year, using either the Summer or Winter CONE Factor (depending on the season in which the annual maximum deficiency occurred).
- Avoids double-charging participants by crediting any monthly deficiency charge already assessed for the month that ultimately becomes the participant's annual maximum deficiency.
- Retains seasonal CONE Factors to reflect differing reliability conditions and system-wide adequacy concerns while improving consistency for participants with similar annual deficiency outcome.

Active WRAP Proposals & Policy Development Updates

September 30 WPP Board Meeting

Type	ID	Title	Description	Impact(s)	COSR Review
Expedited	2026-EP-02	New Onboarding Timeline	Adds a temporary second onboarding window in the Winter for a Winter Binding Season start and moves existing onboarding window to begin on August 1.	BPM 401	Abstained
Task Force	2025-TF-03	Demand Response QCC Task Force	Updates Capability Testing requirement for DR Resources and introduces new QCC methodology based on monthly average availability and program constraints.	BPM 105	Comments (7/15)
Task Force	2025-TF-12	ELCC Task Force: QCC for Long-Duration Storage (Part 1)	Introduces new approach for calculating the QCC of new LDS Resources that do not align with existing resource classes.	BPM 105	Comments (7/20)
Expedited	2026-EP-03	Deficiency Charge Deferral Resolution	Establishes temporary Forward Showing Deficiency Charge deferral mechanism for the WRAP Transition Period (through Winter 2028/29).	Tariff, BPM 109, 210	Comments (9/25)
Expedited	2026-EP-04	New Rockies Subregion	Creates a new Rockies Subregion to accommodate new participants and allow for PRM adoption and continued LOLE and ELCC modeling.	Tariff, BPM 102, 103, 105, 108, 206	Abstained
Expedited	2026-EP-05	CCH by Subregion	Introduces the development of Capacity Critical Hours (CCH) on a subregional basis.	Tariff, BPM 104, 108	Comments (9/25)

Active WRAP Proposals & Policy Development Updates

September 30 WPP Board Meeting

Type	ID	Title	Description	Impact(s)	COSR Review
Non-Task Force	2026-NTFP-03	P-to-P JCAF & Assurance Agreement Changes	Removes Seller's signature requirement for Participant-to-Participant JCARs and establishes agreement for embedded loads' resources	BPM 106	Comments (8/10)
Non-Task Force	2026-NTFP 04	Multi-Day / Operating Day File Prioritization	Provides clarifying language to specify that for operating hours in which both Multi-Day and Operating Day files are available, the Sharing Calculation will prioritize the use of Operating Day files for hours containing concurrent data.	BPM 202	Comments (7/20)
Non-Task Force	2026-NTFP-05	FS Deadline Extension & Deficiency Charge Clarification	Forward Showing / Cure Period deadline extension for FS software system outages and deficiency charge clarification for a participant's first binding season.	Tariff, BPM 107, 108	Comments (7/20)

Active WRAP Proposals & Policy Development Updates

September 30 WPP Board Meeting – Additional Expedited Proposals

Type	ID	Title	Description	Impact(s)	COSR Review
Expedited Proposal	2026-EP-06	Rockies FS Deadline	Adjusts the FS deadline, WPP review, and Cure Period for the Winter 2027/2028 Binding Season for the Rockies Subregion only. Establishes Rockies FS Deadline nine months after the Board's approval of the applicable FSPRMs, consistent with the amount of time provided under the standard WRAP timeline.	Tariff, BPM 101 & 108	9/28 – 9/29
Expedited Proposal	2026-EP-07	Contingency Reserves Policy	Changes the current CR requirement methodology of 3% generation / 3% load to 200% of the previous year's Most Severe Single Contingency (MSSC). The CR requirement is a first viewed on a BA basis and is then allocated to load within the BA based on load ratio share.	Tariff	9/28 – 9/29

Formerly 2026-NTFP-07 (see slide 18)

Final EPs will be sent to COSR on Monday, September 28

Active WRAP Proposals & Policy Development Updates

December 10 WPP Board Meeting

Type	ID	Title	Description	Impact(s)	COSR Review
Non-Task Force	2026-NTFP-06	Uncertainty Calculation Timing Changes	Changes the timing of the Uncertainty Factor calculation to align with the binding Sharing Calculation to ensure consistent use of the latest available load forecast.	BPM 203	Abstained
Non-Task Force	2026-NTFP-08	Deficiency Charge Construct with Sharing Calculations	Introduces updates to better align annual charges and revenue distributions with the proposed/new Deficiency Charge framework, reducing differences based on whether a participant's deficiency occurs in Summer or Winter.	Tariff, BPM 107, 108	October / November
Task Force	2025-TF-04	Day Ahead Market Task Force	Updates the WRAP Operations Program for Interim Seasons (prior to Binding) and prepares for the transition of the operations program to SPP Markets+.	Tariff, BPM 201, 202, 205, 206, 209	October / November
Other	New BPM 110	BPM 110 - Cost of New Entry (CONE)	Introduces a new BPM 110 to establish the process for calculating the Cost of New Entry (CONE), including the annual review. This section will also include the new CONE-value.	BPM 110	October / November
Expedited	2026-EP-06	Contingency Reserves for Seasons with Approved PRMs	Introduces approach to incorporate the impact of reduced contingency reserves (2026-NTFP-07) for seasons with approved PRMs.	TBD	October / November

7. Upcoming Meetings & Important Dates

Upcoming Meetings & Important Dates

September 25: Resource Adequacy Participants Committee (RAPC) Meeting

September 30 (Portland, OR): WPP Board of Directors Meeting

October 6: Data Center & Large Loads Task Force Meeting

October 8: Resource Adequacy Participants Committee (RAPC) Meeting

October 13-15 (Missoula, MT): Fall 2026 Joint CREPC-WIRAB Meeting

October 14: Program Review Committee (PRC) Meeting

October 20: Data Center & Large Loads Task Force Meeting

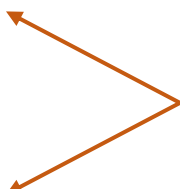
October 22: Resource Adequacy Participants Committee (RAPC) Meeting

October 23: COSR Monthly Meeting

November 20: COSR Monthly Meeting

December 10: WPP Board Meeting

December 11: COSR Monthly Meeting



Rescheduled due to November
and December holidays

Appendix I: PRC 2026-2027 Workplan – Board Approved

