Committee of State Representatives

November 20, 2026

Agenda

1. Chair's Welcome & Roll Call – Chris Parker, COSR Chair
2. RAAG Updates – Robin Arnold, WIEB
3. Joint Comments on Western Seams Coordination – George Lynch, WIEB
4. General WRAP Updates – Elliott Nethercutt, WIEB
5. Update on Active Proposals & Policy Changes – Elliott Nethercutt, WIEB
    a. Cost of New Entry (BPM 110)
    b. Data Center & Large Loads TF Proposal
    c. WRAP ELCC + QCC (ELCC Methodology) TF Proposal
    d. BA Represented Loads Expedited Proposal (2026-EP-08)
    e. Partial Load & Resource Participation Expedited Proposal (2026-EP-09)
6. MPEC / MRAWG Update – Elliott Nethercutt, WIEB
7. Upcoming Meetings & Important Dates – Elliott Nethercutt, WIEB
8. Review of Planning Reserve Margins – Charles Hendrix, SPP
    a. 2027/2028 Winter (Updated)
    b. 2028 Summer
9. Adjourn

** There are **No** action items for this meeting.*

1. Chair’s Welcome & Roll Call

2. RAAG Updates

3. Joint Comments on Western Seams Coordination

4. General WRAP Updates

5. Update on Active Proposals & Policy Changes

Update on Active Proposals & Policy Changes

BPM 110 - Cost of New Entry (CONE)

Summary of COSR Leadership Comments (Submitted on October 21)

- Supports the underlying methodology
- Requests additional explanation related to the source data and input values used to calculate the final CONE value, recognizing its importance for determining the determining deficiency charges.
- Recommends including key input assumptions and references to publicly available data sources in BPM 110 or supporting materials.
- Greater transparency would be consistent with the practices used in other market constructs and help stakeholders assess the reasonableness of the CONE estimate.
- Supports the proposed review schedule, update thresholds (+/-10%), and corresponding stakeholder engagement process.
- Notes that COSR will continue exploring a framework to direct deficiency charge revenues toward increasing the availability of new resources in the west.

Update on Active Proposals & Policy Changes

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BPM 110 Updates in Response to Comments from COSR & General Public:

1. Added the current CONE value to the BPM
2. Will publish supplemental report that includes input values and sources

Update on Active Proposals & Policy Developments

Data Center & Large Loads Task Force Proposal

Background

- Task force members examined two questions: 1. should data centers and other non-conforming large loads be excluded from WRAP load obligations, or have their own Planning Reserve Margins (PRMS)? [PacifiCorp] ; and 2.) should large loads with backup generation qualify for a load exclusion from WRAP for purposes of calculations and meeting the Forward Showing? [AWS]

Policy Impacts & Next Steps

- Maintain existing treatment of large loads: no changes to current policies for load exclusions, Customer Resource QCC methodology for data center backup generation, or the calculation of monthly Forward Showing PRMs. Large loads will continue to receive no special treatment under existing BPM 103 and BPM 105 rules.
- Revisit policies after operational experience: the above policies may be reassessed following the Winter 2027/2028 Forward Showing (first binding season).
- Increase flexibility for new loads with DR: new, expanded, or late-registered DR resources enabled by on-site generation may submit engineering design specifications to support initial QCC claims when there is insufficient time to complete DR testing, as required by the WRAP.
- COSR Review Period: mid-January

Update on Active Proposals & Policy Developments

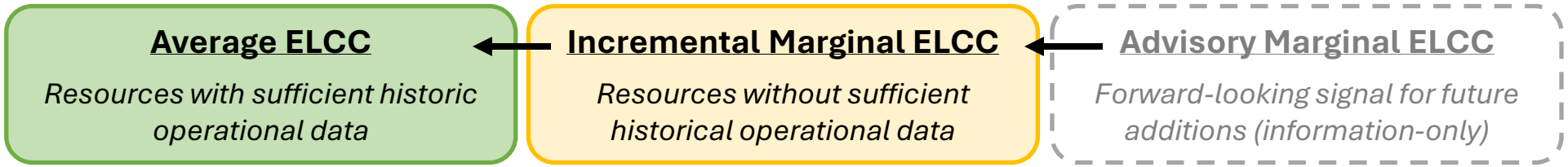
WRAP ELCC + QCC (ELCC Methodology) TF Proposal

Background

- Task force has been refining a new ELCC approach introduced by APS in February.

Policy Impacts & Next Steps

- Status: Task Force reviewed and opted to move forward with the proposal; PRC approved the proposal for public comment.
- "Hybrid" ELCC approach:



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Update on Active Proposals & Policy Changes

BA Represented Loads Expedited Proposal (2026-EP-08)

Background

- WRAP participation is established separately for each Load-Representing Entity, while Markets+ participation is structured around Balancing Authorities, creating circumstances in which a participant may need to represent loads beyond its own LRE.

Policy Impacts & Next Steps

- This APS-sponsored proposal updates existing definitions to clarify that a WRAP Participant may represent load for which it has authority, including load associated with another entity.
- Revises the existing definitions of "Participant" and "Load-Representing Entity (LRE)" in the WRAP Tariff rather than creating a new “Representing Participant” term.
- Supports Markets+ participation by allowing a BA-based participant to represent multiple loads within its footprint.
- COSR review period: November 24-December 8

Update on Active Proposals & Policy Changes

BA Represented Loads Expedited Proposal (2026-EP-08)

Proposed Tariff Modifications (Definitions; p.9)

Load Responsible Entity ("LRE"): An LRE is an entity that (i) owns, controls, purchases and/or sells resource adequacy supply, or is a Federal Power Marketing Administration or an International Power Marketing Entity, or is duly authorized by applicable legal, regulatory, contractual, or other governing authority to represent a load serving entity or multiple load serving entities as agent or otherwise, and (ii) has full authority and capability, either through statute, rule, contract, or otherwise, to:

a) submit capacity and system load data to the WRAP Program Operator at all hours;
b) submit Interchange Schedules within the WRAP Region that are prepared in accordance with all NERC and WECC requirements, including providing E-Tags for all applicable energy delivery transactions pursuant to WECC practices and as required by the rules of the WRAP Operations Program;
c) procure and reserve transmission service rights in support of the requirements of the WRAP Forward Showing Program and Operations Program; and
d) track and bilaterally settle holdback and delivery transactions.

(iii) In the absence of meeting the criteria (a) through (d) above, is duly authorized by applicable legal, regulatory, contractual, or other governing authority to coordinate with the load serving entity or load serving entities to obtain information needed to fulfill its own WRAP responsibilities as they relate to said entity or entities.

Update on Active Proposals & Policy Changes

BA Represented Loads Expedited Proposal (2026-EP-08)

Proposed Tariff Modifications (Definitions; p.11)

Participant: A Load Responsible Entity, or an entity that has been duly authorized by applicable legal, regulatory, contractual, or other governing authority to represent a Load Responsible Entity or multiple Load Responsible Entities, that is a signatory to the WRAPA.

Update on Active Proposals & Policy Changes

Partial Load & Resource Participation Expedited Proposal (2026-EP-09)

Background

- Original WRAP design required a participant to enroll all of its loads and resources into the program to allow visibility of participant's complete RA position while preventing selective inclusion of favorable loads or capacity.
- WRAP was originally designed around "full-portfolio" participation, requiring an LRE to enroll all load and resources for which it is responsible in the Western Interconnection, promoting visibility of RA positions and preventing the selective inclusion of favorable loads or capacity.
- The emergence of western markets creates circumstances where an LRE may need to participate in WRAP with only a portion of its load portfolio.

Policy Impacts & Next Steps

- Establishes a BA-based participation framework that allows an LRE to participate without enrolling its entire load and resource portfolio.
- Maintains the requirement for all WRAP-participating load to be backed by adequate resources.
- Prevents participants from creating artificially adequate WRAP portfolios.
- COSR review period: November 24-December 8

Update on Active Proposals & Policy Developments

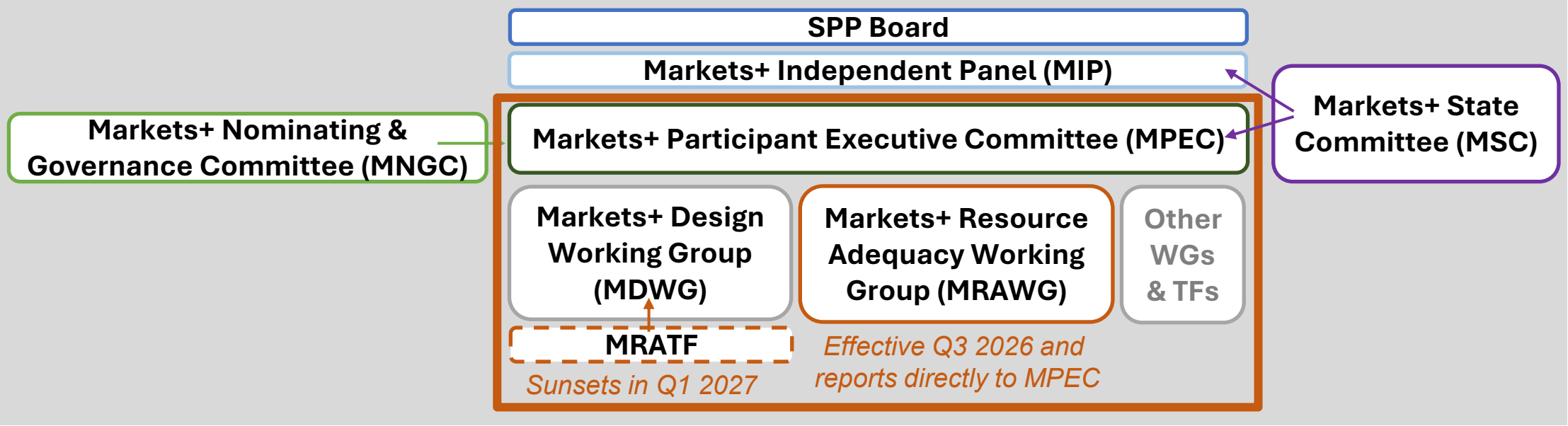
December 10 WPP Board Meeting Approval Items

Type	Title (ID)	Description	Impact(s)	COSR Review
Non-Task Force	**Uncertainty Calculation Timing Changes (2026-NTFP-06)**	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
Task Force	**Day Ahead Market Task Force (2025-TF-04)**	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	Committee Comments (10/23)
Non-Task Force	**Contingency Reserves (2026-NTFP-07)**	Updates BPM following FERC-approval of Tariff changes introduced in 2026-EP-07 to create WRAP alignment between updated RSG CR requirements following the retirement of BAL-002-WECC-3 Standard.	BPM 101, 102, 103, 202	Abstained
Non-Task Force	**Deficiency Charge Construct with Sharing Calculations (2026-NTFP-08)**	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	Abstained
New BPM	**BPM 110 - Cost of New Entry (CONE)**	Introduces BPM 110 to establish methodology and annual review process for calculating CONE. Latest BPM includes CONE value ($132.41/kW-yr) with reference to supplemental documentation, including input values and sources.	BPM 110	Leadership Comments (10/21)
Expedited	**BA Represented Loads (2026-EP-08)**	Updates existing Tariff definitions to introduce a Representing Participant authorized to represent an LRE/LSE.	Tariff	November 24 - December 8
Expedited	**Partial Load & Resource Participation (2026-EP-09)**	Creates framework to allow partial participation in WRAP, while preserving the program's reliability objectives.	Tariff, BPM 105, 108, 202	November 24 - December 8

6. MPEC / MRAWG Update

MPEC / MRAWG Update

Formation of the Markets+ Resource Adequacy Working Group (MRAWG)



Latest Developments

- MRAWG roster is still being determined; for approval in February 2027.
- MRATF will meet November 30.

MPEC / MRAWG Update

Clarification of WRAP Forward Showing Capacity Requirement for Markets+ Loads (MIR91-R)

Background

- Under current WRAP rules, certain load exclusions are permitted, but Markets+ policy assumes that all Markets+ load is covered by WRAP requirements.

Policy Impacts & Next Steps

- Ensures all Markets+ load is subject to WRAP forward-showing and operational requirements.
- Prohibits the use of WRAP load-exclusion provisions for Markets+ registered load while preserving those provisions for other WRAP participants.
- Aligns Markets+ participation with WRAP reliability objectives and closes a potential compliance gap between the two frameworks.
- Approved by MPEC (99%); advances to the Interim Markets+ Independent Panel (IMIP) for final consideration.

7. Upcoming Meetings & Important Dates

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November 2026 – January 2027

November 24: Resource Adequacy Participants Committee (RAPC) Meeting

December 1: Data Center & Large Loads Task Force Meeting

December 3: Resource Adequacy Participants Committee (RAPC) Meeting

December 10: WPP Board Meeting

December 11: COSR Monthly Meeting (WPP Board Meeting Recap | 2026 Policy Review | ELCC)

December 15: Data Center & Large Loads Task Force Meeting

December 16: Program Review Committee (PRC) Meeting

December 17: Resource Adequacy Participants Committee (RAPC) Meeting

December 29: Data Center & Large Loads Task Force Meeting

January 22: COSR Monthly Meeting

8. Review of Planning Reserve Margins

Appendix I: PRC 2026-2027 Workplan – Board Approved

