

Committee of State Representatives

January 23, 2026

Agenda

1. Chair's Welcome and Roll Call – Chris Parker, COSR Chair
2. General WRAP & Administrative Updates – Laura Rennick, WIEB
 - a. RA principles feedback/status – Megan Decker, Staircase Advisory
3. COSR Business
 - a. COSR Leadership Election* – Chris Parker, COSR Chair
 - b. Discuss potential COSR comments on BPA non-task force proposal – Elliott Nethercutt, WIEB
 - c. COSR feedback on 2026 PRC Workplan– Elliott Nethercutt, WIEB
4. WRAP Planning Reserve Margin task force proposal – Maya McNichol, WPP
 - a. Introduction
 - b. Timeline for COSR comments
5. Upcoming Meetings & Important Dates – Elliott Nethercutt, WIEB
6. Adjourn

**Action items for this meeting.*

1. Chair Welcome & Roll Call

2. General WRAP & Administrative Updates

3. COSR Business

COSR Leadership Election

COSR Charter (Section 2): *“the COSR will hold an election each year to select a Chair and Vice Chair from among the committee members.”*

Thanks to Letha Tawney for her contributions this past year!

Motion: *Approve 2026 COSR leadership:*

- **Chair:** Chris Parker, Director – Utah Division of Public Utilities
- **Vice-chair:** Brian Rybarik, Chair – Washington UTC

BPA's Transmission Proposal (NTFP)

BPA proposes a reduction in the long-term firm transmission requirement in the forward showing:

Current Approach

Participant's total demonstrated Forward Showing Transmission shall be at least equal to 75% of the Participant's **Forward Showing Capacity Requirement** (P50 Load + PRM) at the FS Deadline



BPA Proposal Approach

Participant's total demonstrated Forward Showing Transmission shall be at least equal to 75% of the Participant's ~~FS Capacity Requirement~~ **P50 Peak Load Forecast*** at the FS Deadline

OUTCOME: Effectively removes the PRM from the Forward Showing transmission requirement by attaching the requirement to only the P50 load, as opposed to the P50 load + PRM

**P50 Peak Load Forecast: A peak load forecast prepared on a basis, such that the actual peak load is statistically expected to be as likely to be above the forecast as it is to be below the forecast.*

BPA's Transmission Proposal (NTFP)

Comments received from three WRAP participants:

APS	Idaho Power	SRP
<ul style="list-style-type: none">• Unable to support; does not believe the proposal will enhance regional RA.• Regional RA requires both resources and transmission• Current requirement (75% of FS) already reflects a compromise (many participants support expanding requirement to 100% of FS Capacity Requirement)• Excluding PRM in setting a transmission requirement is inconsistent with the PRM's intention; load closer to P100 is included in the PRM and should not be separated from transmission requirement• WRAP's deliverability requirement is critical for ensuring transmission continues to develop with day-ahead markets; weakening this component weakens future transmission development	<ul style="list-style-type: none">• Questions the proposal to remove the PRM from the FS transmission requirement calculation instead of simply reducing the transmission requirement from 75% (this would provide a more flexible approach while maintaining a direct link between transmission and total capacity requirement)• Request analysis to show impacts of reduced transmission requirement	<ul style="list-style-type: none">• Recognizes transmission (resources to loads) is a critical element of RA and that planning entities often account for load forecast error in transmission procurement• Requests some examples to demonstrate impacts of how removing the PRM portion is expected to be managed between the FS and Operations• Believes a TF and collaborative discussions may help ensure any reduction in the firm transmission requirement appropriately reflects consensus for how transmission supports RA

BPA's Transmission Proposal (NTFP)

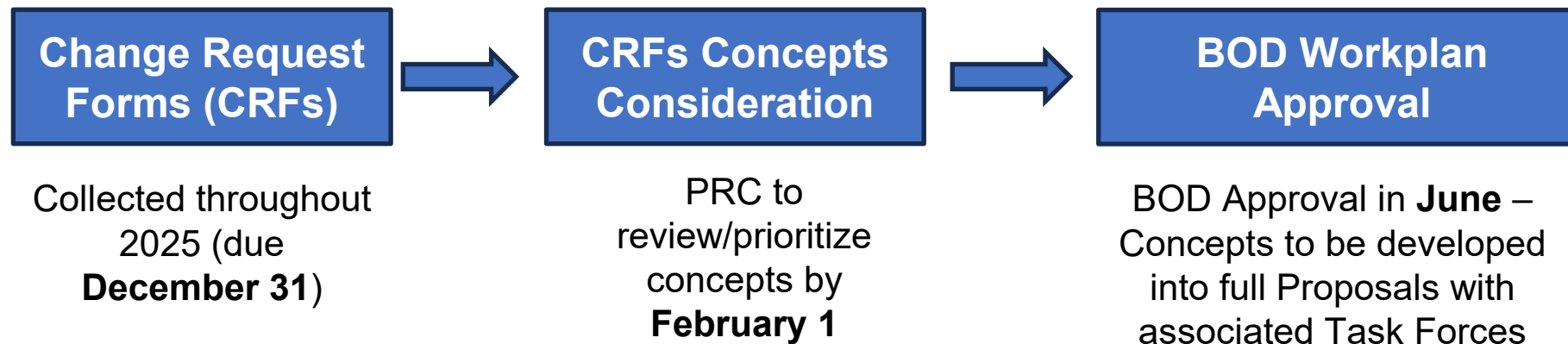
COSR engagement (comment period in early-February)

- Regional RA depends on having both adequate generation resources and enough transmission to deliver them. Will this proposal compromise the transmission deliverability component?
- Should this proposal be developed through a more robust process that involves all program participants?

PRC Workplan Development

2026 Program Review Committee (PRC) Workplan Status

The PRC serves as the “clearing house” for recommended design changes to the WRAP



- **Input from:** WRAP Participants, the COSR, the WRAP Board of Directors, other committees, stakeholders, or the public
- **For 2026 Workplan Consideration:** 12 (9 consolidated) concepts
- **COSR’s Role:** Staff is seeking COSR feedback on prioritization (complete list in Appendix I)
- **Next steps:** PRC will prioritize concepts during January 28 meeting

PRC Workplan Development

Program Review Committee (PRC) [2025 Workplan](#) Status

Concept / TF	Status	Public Comment Period	COSR Comment Period
CAISO Transmission TF	Board approved. WPP Staff preparing FERC tariff	Complete	Complete
Planning Reserve Margin (PRM) TF	Proposal complete (<u>proposal out for comment</u>). Task force agreed to final proposal and PRC approved for 4-week public comment period. <i>WPP Staff to summarize proposal at 1/23 COSR meeting.</i>	January 21 – February 4	TBD (after public comment), likely mid-late February
Day Ahead Market (DAM) TF	WPP Staff preparing to resume task force meetings in early 2026		
Demand Response (DR) QCC TF	Task force near completion of DR tool that seeks to achieve more accurate monthly DR values		
ELCC TF	Next task force from 2025 Workplan to begin in 2026 – this covers ELCC by vintage and ELCC of long-duration energy storage		
Load Growth TF	On hold until DAM TF proposal is complete		

PRC 2026 Workplan Development

COSR Feedback on PRC 2026 Concepts *(Please select your preferred topic)*

a. Transmission Accreditation

Examine impacts of large, interregional transmission projects (e.g., North Plains Connector) on PRM requirements (modeling assumptions for non-firm imports on large lines)* – NorthWestern

Capture quantifiable capacity benefits of transmission projects (include certain lines as qualifying resources, give attributed capacity values sufficient for inclusion in a participant's FS Capacity Requirement)* – RenewableNW

b. Accounting for Large Loads

Study how large loads are considered in the Forward Showing Capacity Requirement (can loads with sufficient backup generation elect to be excluded from the responsible entity's load forecast?)* – Amazon

Review and potentially modify modeling practices & policy frameworks for non-conforming, high-load-factor resources (e.g., data centers)* – PacifiCorp

c. WRAP Benefits

Establish working group to review options and determine approach that allows for the incorporation of WRAP benefits in PRM planning* – APS

d. Other Topics *(see Appendix I)*

*Requires establishment of a Task Force

4. WRAP Planning Reserve Margin (PRM) Task Force Proposal

5. Upcoming Meetings & Important Dates

Upcoming Meetings & Important Dates

Early-February: COSR Comment Period for BPA's NTFP

February 5 | 2:00pm (MT): WIRAB Monthly Meeting (2025 WECC Assessment of RA)

Mid-to-Late-February: COSR Comment Period on PRM Proposal

February 27 | 10:00am (MT): COSR Monthly Meeting

March 27 | 10:00am (MT): COSR Monthly Meeting

May 12-14: Spring 2026 Joint CREPC-WIRAB Meeting (San Diego, CA)

6. Adjourn

Appendix I: PRC 2026 Workplan Concepts

#	Change Request(s)	Topic	Summary / Proposed Action
1	2025-CRF-007 <i>Chelan PUD</i> 2025-CRF-011 <i>SCL</i>	WRAP E-Tags	Establish programmatic approach for identifying WRAP-specific E-Tags (SPP market mechanism to deliver energy through the WRAP program during a sharing event).
2	2025-CRF-009 <i>Northwestern</i> 2025-CRF-010 <i>RenewableNW</i>	Transmission Accreditation*	<u>NorthWestern proposes forming a TF to examine how the North Plains Connector (NPC) project would impact PRM requirements in the WRAP (consideration of modeling assumptions for non-firm imports on NPC and/or other lines and/or similar assessments or modeling treatment).</u> Renewable NW proposes capturing quantifiable capacity benefits of transmission projects. This would involve modifying the BPM to <u>include certain transmission lines as qualifying resources to be attributed capacity values sufficient for inclusion in a participant's FS Capacity Requirement.</u>
3	2025-CRF-012 <i>SCL</i>	Shoulder Month PRMs	<u>Establish a limited exception that allows relief from deficiency charges in designated shoulder months when PRM-driven FS Capacity Requirements materially exceed a participant's historical seasonal peak load (exception allowed once per season, subject to defined trigger conditions and verification requirements).</u>
4	2025-CRF-013 <i>SCL</i>	Inter-Participant JCAFs	Allow <u>participant qualifying contracts within the WRAP program to be validated without requiring executed JCAF signatures,</u> provided that other conditions are met.

*Suggested topic for COSR

Appendix I: PRC 2026 Workplan Concepts

#	Change Request(s)	Topic	Summary / Proposed Action
5	2025-CRF-014 <i>Amazon</i>	Large Loads*	Amazon proposes amending BPM 103 – “Participate Forward Showing Capacity Requirements” to <u>clarify that loads with sufficient backup generation can elect to exclude their load from the Load Responsible Entity’s load forecast.</u>
	2025-CRF-019 <i>PacifiCorp</i>		PacifiCorp recommends <u>reviewing and potentially modifying modeling practices and policy frameworks for non-conforming, high-load-factor resources (e.g., data centers); better understand capacity requirements to meet 1-in-10 LOLE standard.</u>
6	2025-CRF-015 <i>APS</i>	WRAP Benefits*	Establish a mechanism to reflect capacity reductions associated with WRAP participation in their RA and capacity expansion planning. Proposal to <u>establish a working group to review options and determine approach that allows for the incorporation of WRAP benefits in PRM planning.</u>
7	2025-CRF-016 <i>BPA</i>	Non-WRAP BAA Loads	<u>Provide WRAP Participants with the option of treating loads located in BAA’s external to the WRAP footprint in the same manner as they treat long-term sales external to the WRAP footprint.</u>
8	2025-CRF-017 <i>BPA</i>	CRE Waiver	Proposal to formally include efforts around the RAPC resolution to reform Forward Showing charges and the definition of commercially reasonable efforts. <u>The goal is to ensure that this discussion is held at the PRC level (via the PRC change process) as well as at the RAPC.</u>
9	2025-CRF-018 <i>BPA</i>	Load Responsibility Transfer	Proposal would <u>allow the LRE to hold responsibility in the Forward Showing (planning responsibilities), but shift load responsibility to the load's BA during the operations program.</u> This ‘Transfer’ of load would align Load Service Responsibility with what has been contracted for in real-time operations. Uncertainty in the sharing calculation would also shift, aligning with actual delivery.

*Suggested topic for COSR