

Committee of State Representatives

March 27, 2026

Agenda

1. Chair's Welcome and Roll Call – Chris Parker, COSR Chair
2. General WRAP & Administrative Updates – Laura Rennick, WIEB
3. EDAM RA Update – Robin Arnold, WIEB
4. Updates on WRAP Developments – Elliott Nethercutt, WIEB
 - a. BPA Transmission Non-Task Force Proposal (NTFP)
 - b. 2026 WRAP Draft PRC Workplan
 - c. Planning Reserve Margin (PRM) Task Force Proposal
5. COSR Business – Chris Parker, COSR Chair
 - a. Approve 2026 Draft PRC Workplan Comments*
 - b. Approve Development of PRM Task Force Proposal Comments*
6. Review of Recent Western Resource Adequacy Analyses
 - a. E3: RA and the Energy Transition in the PNW (Phase I Assumptions) – Arne Olsen, E3
7. Upcoming Meetings & Important Dates – Elliott Nethercutt, WIEB
8. Adjourn

**Action Items for this meeting.*

1. Chair's Welcome & Roll Call

2. General WRAP & Administrative Updates

3. EDAM RA Update

4. Update on WRAP Developments

Update on WRAP Developments

Concept / TF	Status	Public Comment Period	COSR Comment Period
BPA Transmission Non-Task Force Proposal (NTFP)	BPA is reviewing comments from Idaho Power, SRP, and APS; no further updates	Concluded	TBD
2026 Draft PRC Workplan	Out for public comment (including COSR) <i>Supporting Materials</i> <ul style="list-style-type: none"> • <i>Draft COSR comments</i> • <i>Appendix I: Proposal Summary</i> • <i>Appendix II: Workplan Prioritization Options</i> 	March 13 – April 15	
Planning Reserve Margin (PRM) TF Proposal	Proposal complete; public comment period complete <i>Supporting Materials</i> <ul style="list-style-type: none"> • <i>Appendix III: WPP & WIEB summaries of public comments; PRM timeline slides</i> • <i>Draft comment points (Slides 13-15)</i> 	Concluded	March 20 – April 3

Update on WRAP Developments

2026 Draft PRC Workplan

Process Overview

- Concept prioritization in January was foundational, with subsequent adjustments in response to Participant feedback and RAPC input.
- Schedule III was ultimately selected, which incorporates the ongoing 2025 Workplan schedule and other WRAP workstreams.
- There are 2 work streams that include Proposals / Task Forces with sequencing based on consideration for WPP and WRAP Participant's staffing availability.

Update on WRAP Developments

2026 Draft PRC Workplan

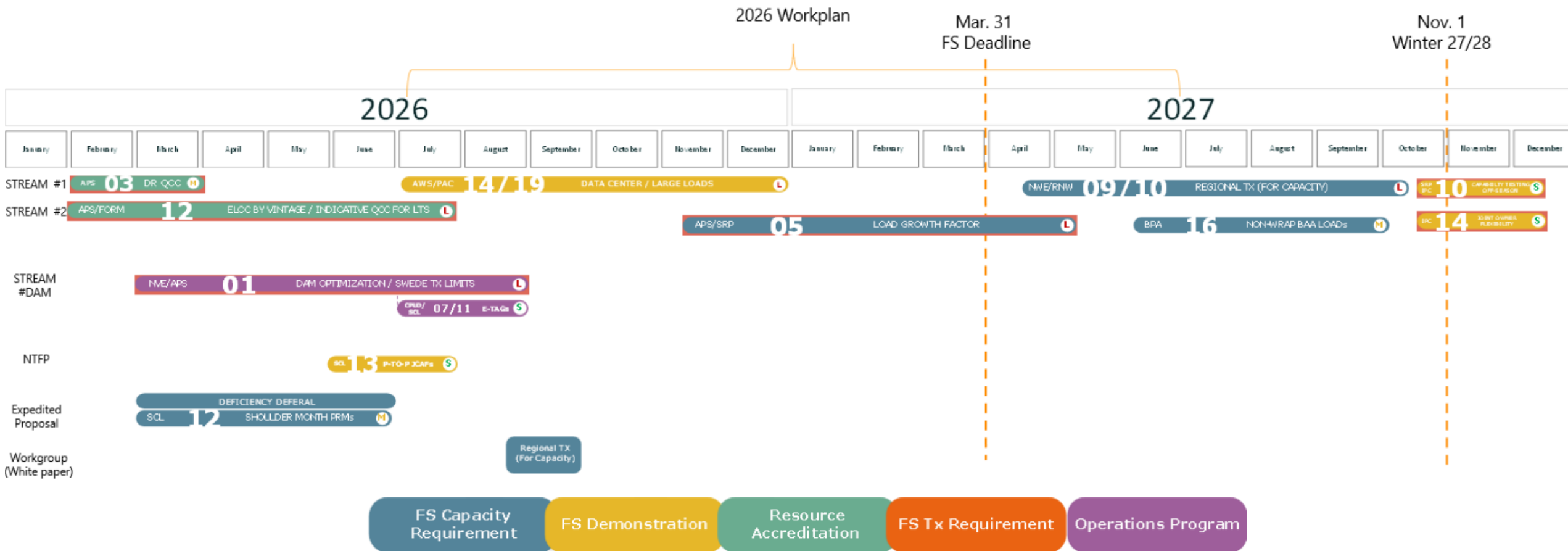
Process Overview

- Concepts due by **end of 2025**
- The PRC will prioritize Concepts at its in-person meeting (**January 28, 2026**)
- Program Administrator/Program Operator (PA/PO) detailed level of effort (LOE) review of each PRC prioritized Concept by **February 15, 2026**
- Following PRC prioritization and detailed PA/PO LOE review, the PRC will begin drafting its draft Workplan between **February 15 - March 13, 2026**
- Stakeholder comment period (including COSR): **March 13 - April 15, 2026**
- PRC responds to comments and continues revision of Workplan, to be approved by the WPP Board in **June 2026**

Update on WRAP Developments

2026 Draft PRC Workplan

Schedule III*



*Other proposed schedules previously considered by the PRC are included in Appendix II. Concepts with a red border are currently part of the 2025 PRC Workplan.

Update on WRAP Developments

2026 Draft PRC Workplan

Summary of [COSR Draft Comment Letter](#)

- **Paragraph 1:** Background / overview
- **Paragraph 2:** Support of prioritization; appreciation for addressing large loads
- **Paragraph 3:** Support for 2026 regional transmission whitepaper ahead of TF efforts in 2027
- **Paragraph 4:** Recognition of streamlining other concepts by utilizing alternative pathways
- **Paragraph 5:** Request for more continued updates on DAM and Deficiency Deferral proposals; request for additional clarification on procedural impacts

Update on WRAP Developments

Planning Reserve Margin (PRM) TF Proposal

Summary of Updates

Component	Change		
Modeling Timeline	Sets advisory FSPRMs 5 years ahead of FS Deadline <ul style="list-style-type: none"> If a Subregion observes a 10% “load trigger” due to participant entry/exit,* a new study will be conducted with updated data; new FSPRMs presented to WPP Board 3 years ahead of FS Deadline If load trigger is not met, advisory FSPRMs presented to WPP Board 3 years ahead of FS Deadline 		
Binding Season	Updated Seasonal Durations <ul style="list-style-type: none"> Summer: Jun 1 – Sep 15 (removes Mar 1-5) Winter: Nov 20 – Feb 28/29 (removes Nov 1-19) 	Updated Peak Months <ul style="list-style-type: none"> Summer Peak Months: Jun, Jul, Aug Winter Peak Months: Dec, Jan, Feb 	
LOLE Study Methodology	Contingency Reserve Requirements <ul style="list-style-type: none"> With the anticipated retirement of BAL-002-WECC-3 Standard, create an NTFP to address alignment between WRAP LOLE model and changing Reserve Sharing Group (RSG) requirements 	Historical Weather Years (Clarification) <ul style="list-style-type: none"> Use a rolling 40 years of weather data for LOLE modeling (as opposed to continually adding years) 	Peak P50 Load Values <ul style="list-style-type: none"> Apply Seasonal Peak Load approach for Summer (currently used for Winter)
Other	Added language to clarify WRAP governance pathways for future policy changes		

*The average peak load for a single participant in each subregion ~10%.

Update on WRAP Developments

Planning Reserve Margin (PRM) TF Proposal

COSR Draft Comment Points

Component	Change
Modeling Timeline	Sets advisory FSPRMs 5 years ahead of FS Deadline <ul style="list-style-type: none">• If a Subregion observes a 10% “load trigger” due to participant entry/exit,* a new study will be conducted with updated data; new FSPRMs presented to WPP Board 3 years ahead of FS Deadline• If load trigger is not met, advisory FSPRMs presented to WPP Board 3 years ahead of FS Deadline

- *The COSR acknowledges benefits of added transparency and predictability by setting the advisory FSPRMs 5 years in advance—longer than most established RA paradigms across the country.*
- *State commissions are responsible for overseeing planning and procurement with consideration for the program's binding PRMs. Generally, more flexibility and optionality would be preferred. However, the COSR understands that other key elements of each participant's RA commitment (e.g., loads, capacity accreditation) will continue to be set closer to the FS deadline, and that advanced commitment through planning and procurement is particularly important in an environment with relative resource scarcity and longer lead times for resource procurement (e.g., supply chain concerns). The COSR understands that the 5-year advance notice will support regional RA.*
- *The COSR would appreciate the inclusion of language explaining how participants arrived at the 10% “load trigger.”*

Update on WRAP Developments

Planning Reserve Margin (PRM) TF Proposal

COSR Draft Comment Points

Component	Change	
Binding Season	Updated Seasonal Durations <ul style="list-style-type: none">• Summer: Jun 1 – Sep 15 (removes Mar 1-5)• Winter: Nov 20 – Feb 28/29 (removes Nov 1-9)	Updated Peak Months <ul style="list-style-type: none">• Summer Peak Months: Jun, Jul, Aug• Winter Peak Months: Dec, Jan, Feb

- *The COSR recognizes that the WRAP’s large geographic footprint provides significant benefits, including operating efficiencies, resource diversity, and the ability to share pooled resources. These benefits are accompanied by challenges associated with establishing a single seasonal duration for all participants, given the substantial variation in summer and winter temperature patterns throughout the West. The COSR ultimately supports the updated seasonal durations and identified Peak Months.*

Update on WRAP Developments

Planning Reserve Margin (PRM) TF Proposal

COSR Draft Comment Points

Component	Change		
LOLE Study Methodology	Contingency Reserve Requirements <ul style="list-style-type: none"> With the anticipated retirement of BAL-002-WECC-3 Standard, create an NTFP to address alignment between WRAP LOLE model and changing Reserve Sharing Group (RSG) requirements 	Historical Weather Years (Clarification) <ul style="list-style-type: none"> Use a rolling 40 years of weather data for LOLE modeling (as opposed to continually adding years) 	Peak P50 Load Values <ul style="list-style-type: none"> Apply Seasonal Peak Load approach for Summer (currently used for Winter)

- *The COSR supports the two proposed changes related to the LOLE study parameters. Specifically, clarifying the use of a rolling 40 years of historical weather for all participants will create consistency and sees benefits in slightly skewing the study toward more recent weather years.*
- *The COSR supports addressing potential changes in WECC contingency reserves with the anticipated retirement of WECC’s BAL-002-WECC-3 Standard through an NTFP to implement the necessary changes to maintain alignment between the WRAP and Reserve Sharing Group (RSG) programs.*

5. COSR Business

COSR Business

PRC 2026 Workplan: COSR Comments

Motion to Approve draft comment letter on the 2026 PRC Workplan for submission to the Western Power Pool's WRAP Program Review Committee.

COSR Business

Planning Reserve Margin (PRM) TF Proposal: COSR Comments Points

Motion to Approve the development of a comment letter for subsequent Committee review, with a separate email vote for approval prior to submission to the Western Power Pool.

6. Review of Recent Western Resource Adequacy Analyses

7. Upcoming Meetings & Important Dates

Upcoming Meetings & Important Dates

March 20 – April 3: COSR Comment Period on PRM TF Proposal

March 13 – April 15: General Comment Period on 2026 PRC Workplan

April 24: COSR Monthly Meeting

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

8. 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

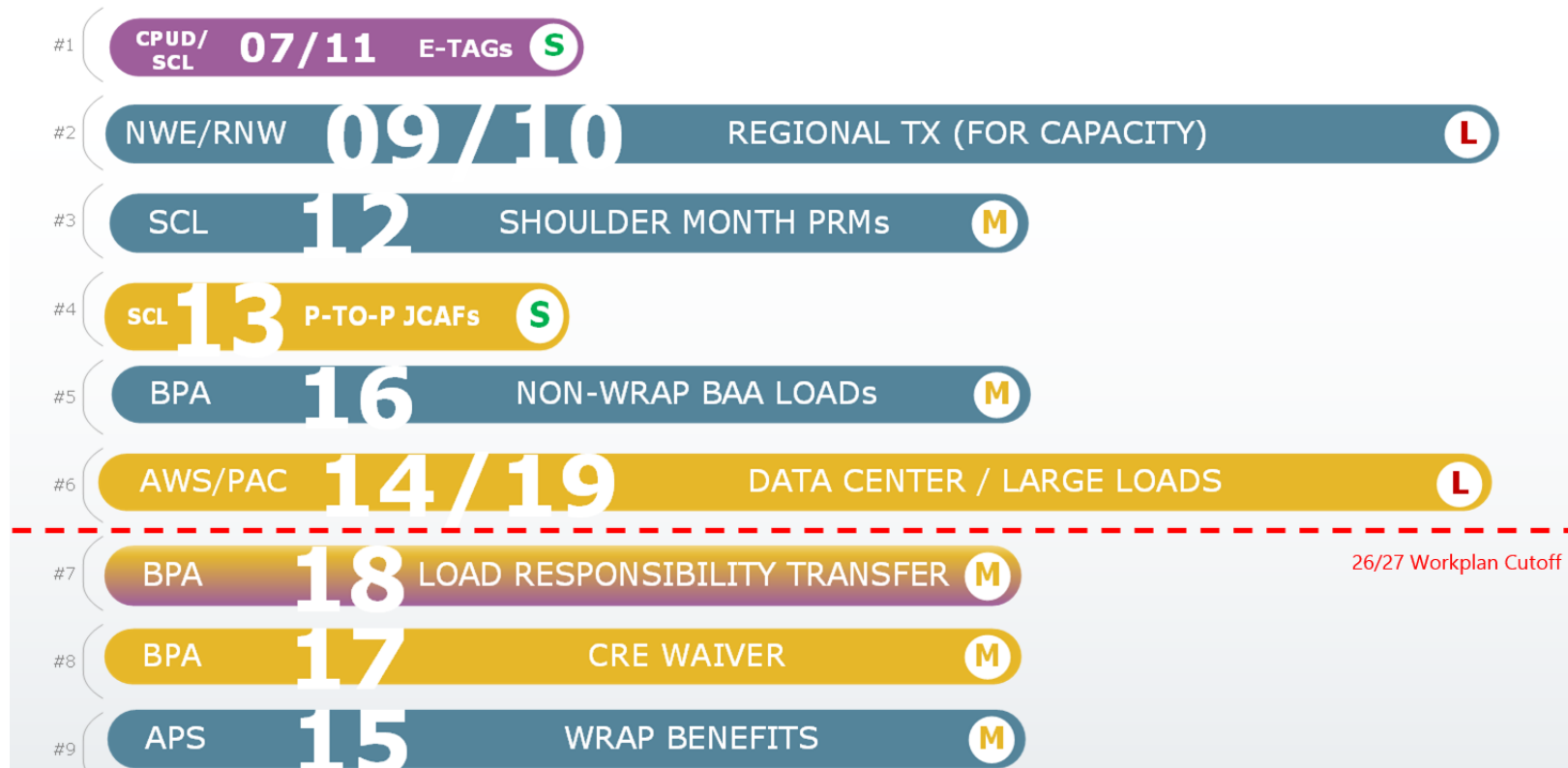
Appendix I: PRC 2026 Workplan Concepts

#	Change Request(s)	Topic	Summary / Proposed Action
5	2025-CRF-014 <i>Amazon</i> 2025-CRF-019 <i>PacifiCorp</i>	Large Loads*	<p>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></p> <p>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></p>
6	2025-CRF-015 <i>APS</i>	WRAP Benefits*	<p>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></p>
7	2025-CRF-016 <i>BPA</i>	Non-WRAP BAA Loads	<p><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></p>
8	2025-CRF-017 <i>BPA</i>	CRE Waiver	<p>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></p>
9	2025-CRF-018 <i>BPA</i>	Load Responsibility Transfer	<p>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.</p>

*Suggested topic for COSR

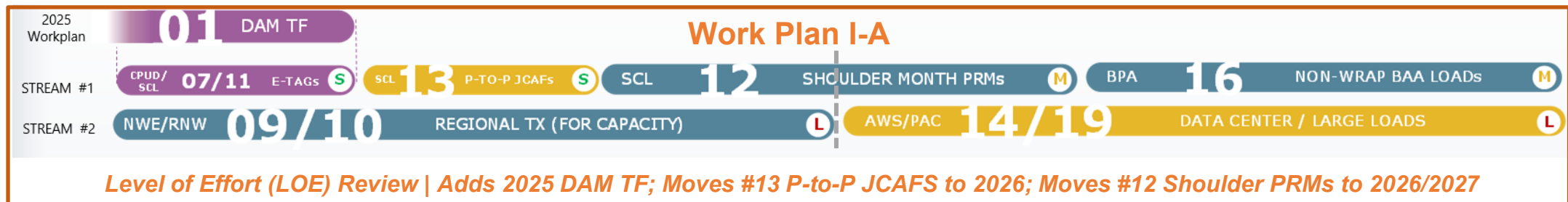
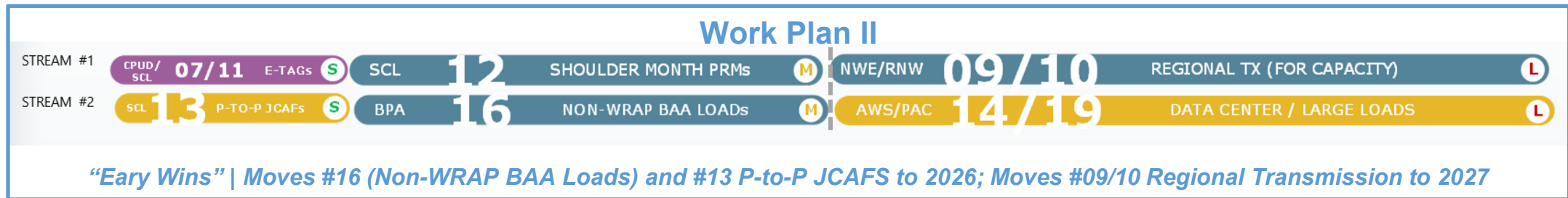
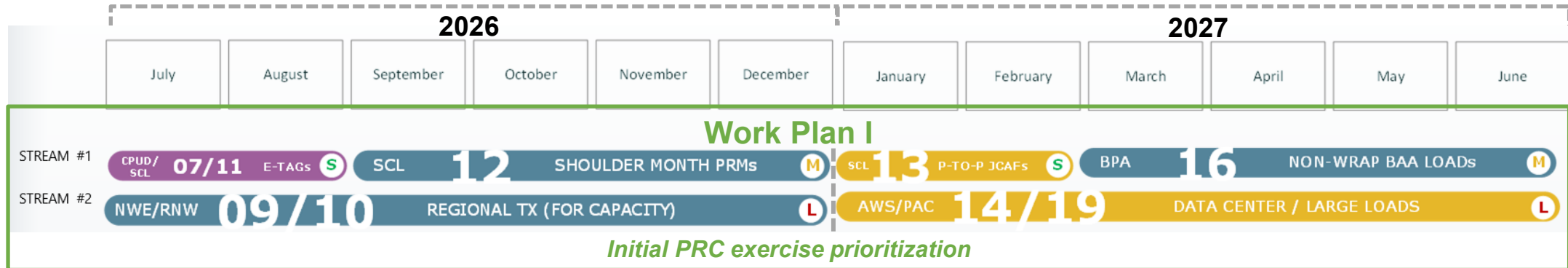
Appendix II: PRC 2026 Workplan Development

PRC 2026 Workplan Development: Initial Prioritization Exercise Results



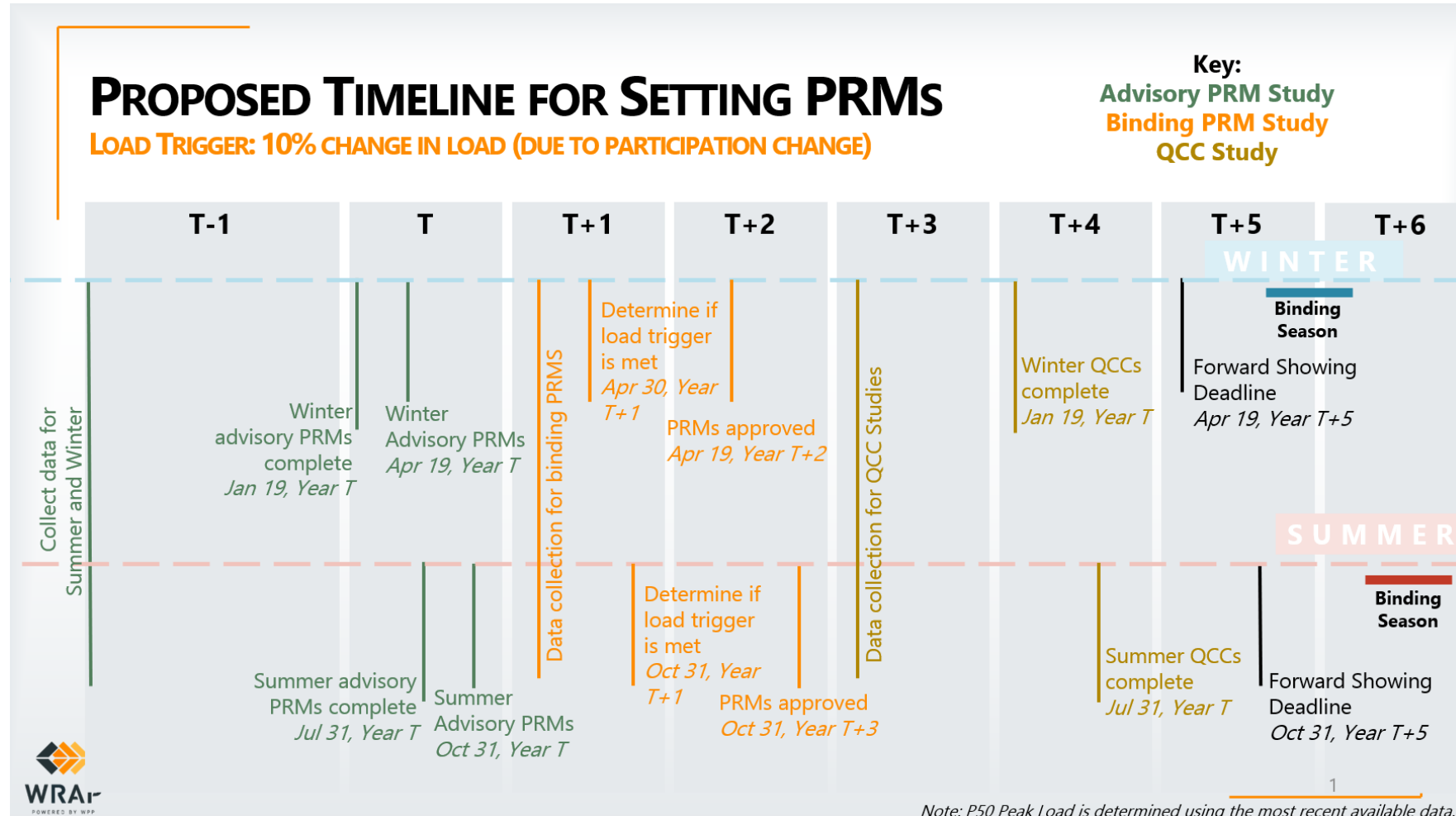
Appendix II: PRC 2026 Workplan Development

Other Work Plan Schedules Considered by PRC



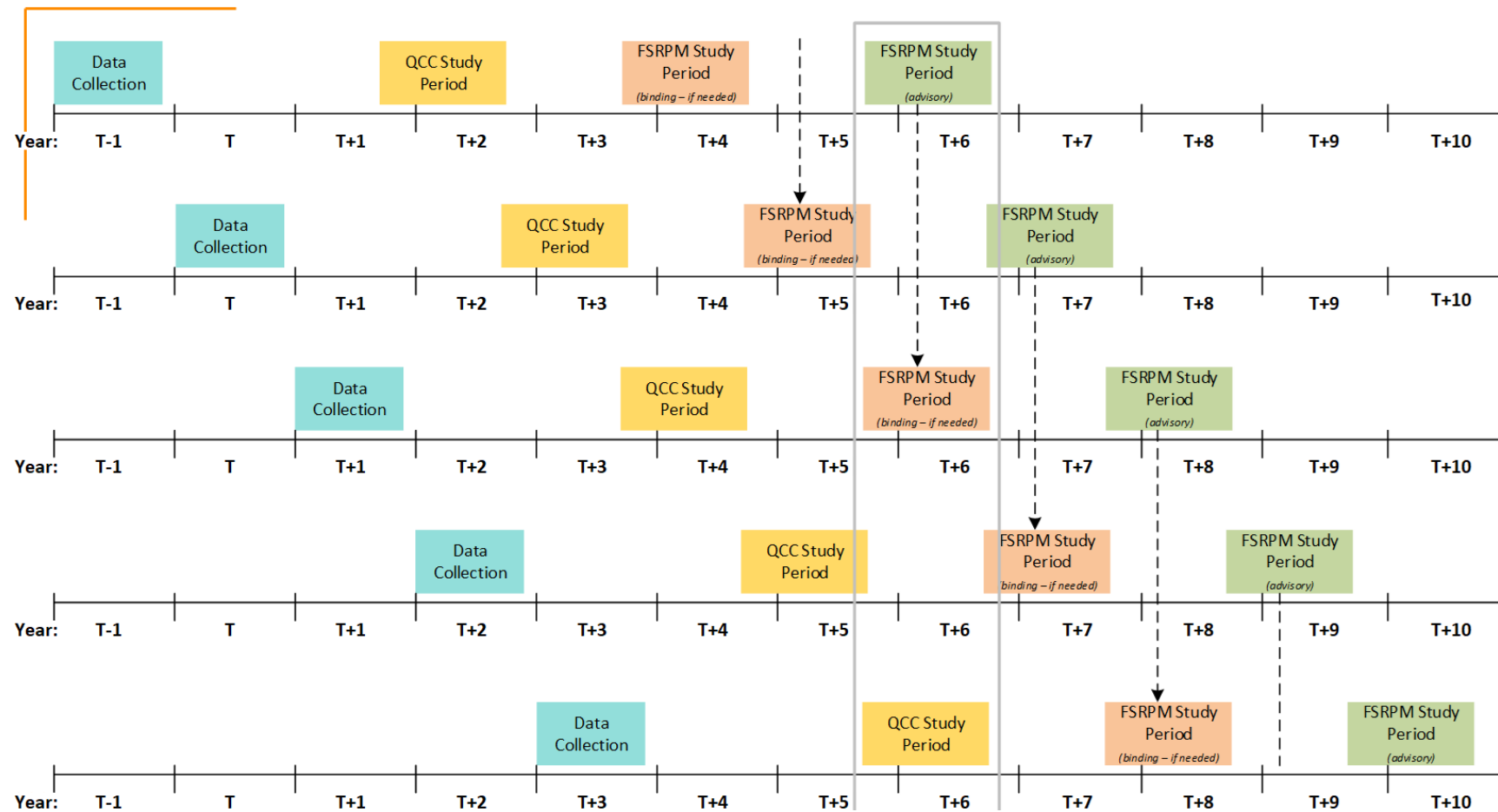
Appendix III: PRM TF Proposal

Planning Reserve Margin (PRM) TF Proposal: Timeline



Appendix III: PRM TF Proposal

Planning Reserve Margin (PRM) TF Proposal: Timeline



Appendix III: PRM TF Proposal

Summary of Comments (Also see [WPP Summary](#))

Proposal Component	Tacoma Power	Idaho Power Company (IPC)	Arizona Public Service (APS)	Salt River Project (SRP)	Seattle City Light (SCL)
FSPRMs Timing	Supports	Supports; recognizes the benefits of locking in the FSPRM both 5 years and 10 years (advisory) in advance; offers strategies to address uncertainty	Does NOT support proposal as drafted. Concerned with misalignment between proposed timing for approval of binding FSPRMs—5 years in advance of the FS Deadline—and the WRAP withdrawal- notification framework. Changes in participation could impact the WRAP’s ability meet the 1:10 LOLE	Advocates for steps to reduce misalignment, including a potential “no greater than” treatment (allows Program Operator to lower PRM requirement within 5-year window if participation changes or transmission is added)	Fixing PRMs 5-years in advance creates misalignment between modeled monthly PRMs and observed reliability risk—particularly in high June PRM
Winter Binding Season	Supports	Supports	Supports; agrees periodic review will be important as system conditions, weather patterns, and load characteristics evolve	Concerned with modifying duration of the winter season when this change is combined with the described prescriptive definition of risk carried in shoulder months. Shifts share of winter risk into a relatively small number of days—particularly in November	Supports; highlights needed attention regarding summer shoulder periods—particularly June
Updated LOLE Study Methodology	Concerns about high June PRMs; misalignment with actual system conditions & could negatively affect multiple participants; suggests new TF efforts to address the issue	Supports	Supports but notes that the effectiveness of all these enhancements is dependent on reasonable alignment between modeled assumptions and actual participation levels over time	Concerned that assigning higher allowable risk in shoulder months will result in higher capacity requirements in peak months (shoulder month requirement reduced at expense of peak months). Recommends removing prescriptive monthly risk assignment and allow Program Operator to retain existing autonomy to iteratively allocate risk based on initial simulations to balances Participant capacity requirements across season	Does NOT support the current treatment of June. PRM creates planning & procurement challenges; recommends TF reexamine
Implementation Plan & Feasibility	Supports	Supports; this proposal should inform future TFs (Load Forecasting and QCC/ELCC)	Implementation Plan would be strengthened by explicitly addressing how material participation changes after binding PRM approval would be evaluated and managed. Clear checkpoints or adjustment pathways needed to promote reliability objectives throughout FS horizon	If there should be a situation where circumstances materially change after FSPRM is set, recommends path where participants can submit NTFP to change BPM, allowing an out-of-cycle FSPRM update	Supports; notes that implementing earlier FSPRM metrics & revised methodology without addressing June PRM concern may lead to volatility / misalignment that proposal sought to correct

Appendix IV: 2025 Workplan Continuation

Status of 2025 Workplan Continuation

Concept / Task Force	Purpose	Status
CAISO Transmission	Review & update WRAP tariff language for CAISO “high-priority wheeling through” or equivalent products that may not utilize NERC Priority designation, as eligible to meet FS Transmission Requirement	Board approved. WPP Staff preparing FERC tariff
Planning Reserve Margin	Adjusts PRM timing for approval 5 years ahead of FS; modifies duration of binding Winter Season; updates methodology & limit variability	Complete – general comment period closed; TF to reexamine items identified in comments
ELCC + QCC	Explores ELCC methodology / capacity values with intention to provide clarity and consistency between planning cycles	Underway; targeting June completion
Day Ahead Market (DAM) Optimization	Establish market-based footprints and optimize operations	On hold; restart targeting Q2, 2026; ongoing WPP/SPP discussions
Demand Response QCC	DR tool (monthly values, accounting for constraints)	Near completion
Load Growth Factor	Reexamine and update 1.1% Load Growth Factor	On hold

Remaining from 2025 Work Plan