

To: WRAP Planning Reserve Margin Proposal – PRC Workplan Task Force 2

From: Committee of State Representatives

Date: April 9, 2026

RE: COSR Comments on Planning Reserve Margin Proposal – PRC Workplan Task Force 2

Dear PRM Task Force Members:

The Committee of State Regulators (“COSR”) appreciates the opportunity to provide feedback on this PRM proposal,¹ which includes modifications to the Forward Showing Planning Reserve Margin (FSPRM) and Capacity Requirements related to timing and modeling methodology for the Western Resource Adequacy Program (WRAP). The draft proposal includes three components: modeling timelines for advisory and binding FSPRMs, modifications related to the binding season and Peak months, and Loss of Load Expectation (“LOLE”) study methodology. The COSR recognizes the significant level of effort and collaboration required to develop this updated proposal. In accordance with Section 4.2 of the WRAP’s *Business Practice Manual (BPM) 302 – Proposal Development and Consideration*,² the COSR and other stakeholders are granted an opportunity to provide comments and recommended design changes to the WRAP. The COSR recognizes that this proposal is broadly intended to enhance predictability and reduce volatility of the Forward Showing obligation for WRAP participants. The Committee offers the following feedback for consideration:³

Modeling Timeline

With respect to modeling timing, the COSR understands that this proposal would establish five-year advisory FSPRMs in advance of the Forward Showing deadline, with the potential for a restudy to be WPP Board-approved three years in advance, should significant participation changes materialize. The COSR notes that this advanced notice period is longer than those employed by most established resource adequacy paradigms across the country, allowing for greater certainty for utilities and for state regulators who are ultimately responsible for overseeing planning and procurement with consideration for the program's binding PRMs. Ongoing flexibility to address changing conditions closer to the Forward Showing deadline can be addressed through the other key elements of each participant’s RA commitment (e.g., loads, capacity accreditation). However, 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 and permitting challenges). The COSR understands that the 5-year advance notice will ultimately support regional RA, with some flexibility as needed.

¹ COSR Comment on Planning Reserve Margin Proposal - PRC Workplan Task Force 2:

https://www.westernpowerpool.org/private-media/documents/PRC_2025_Workplan_-_PRM_Task_Force_Proposal_-_2026-03-20.pdf.

² All WRAP BPMs can be found at: https://www.westernpowerpool.org/resources/wrap_bpms/.

³ These comments are not intended to pre-empt, supplant, or otherwise circumvent any state or provincial regulatory processes or determinations. As a standing committee of the WRAP, the COSR exists to provide state and provincial guidance on matters pertaining specifically to the program. Any comments provided by the COSR do not indicate individual member positions on proceedings in their respective states and should not be considered pre-judgment of any kind.

Regarding the “load trigger” provision, the COSR would appreciate additional insight related to how the Task Force arrived at the 10 percent criteria that would initiate a restudy. The COSR recommends including further justification for this threshold (i.e., language to clarify that the average peak load for a single participant in each subregion is 10 percent). The COSR would also appreciate continued updates on potential implications that the Day-Ahead Markets Task Force may have on the existing two WRAP Subregions.

Binding Seasons: Duration & Peak Months

The COSR recognizes the theoretical program benefits, including operating efficiencies, increased resource diversity, and the ability to share pooled resources across a wide region. The COSR further understands that modeling across two large subregions introduces other challenges related to identifying seasonal binding windows that capture the significant variation of summer and winter temperature patterns throughout the West. The COSR encourages continued consideration of how binding season constructs can reflect these regional differences, while preserving the reliability and efficiency advantages afforded by the program’s scale.

LOLE Study Methodology

The COSR supports the proposed updates to the LOLE study methodology and agrees that clarifying the use of a rolling forty-year set of historical weather data for all participants will enhance analytical consistency. The COSR further supports addressing potential changes to contingency reserve assumptions in light of the anticipated retirement of the BAL-002-WECC-3 Reliability Standard through a Non-Task Force Proposal to implement the necessary changes to maintain alignment between the WRAP and the Reserve Sharing Group (RSG) programs.

The COSR appreciates the continued engagement of stakeholders and looks forward to further dialogue as this proposal is refined and implemented. Additionally, we appreciate Commissioner O’Connell’s thoughtful comments and encourage WRAP to explore ways to refine and alter its tools to more accurately reflect current system conditions and changing patterns of risk.

Following an email vote, the COSR endorsed these comments by a majority of the current members (note that not every member responded to the vote before the comment deadline). New Mexico Commissioner Pat O’Connell did not endorse these comments and provided a dissenting perspective, included as Attachment A.

Respectfully,

The Committee of State Representatives

Chris Parker

Chair, Committee of State Representatives
Director, Utah Division of Public Utilities

Brian Rybarik

Vice Chair, Committee of State Representatives
Chairman, Washington Utilities and
Transportation Commission

Attachment A: Dissenting Comments of Commissioner O'Connell (New Mexico)

I recognize and appreciate the effort and collaboration required to develop this updated proposal. This dissent is offered as hopeful encouragement to WRAP to move beyond a planning reserve margin (PRM) construct. Southwest Reserve Sharing Group (SRSG) has shown that stakeholders working together can use common goals to reduce costs while improving reliability. WRAP can do the same with resource adequacy.

Despite past success, PRM is likely to obscure risk and provide a false sense of resource adequacy. Use, production and management of electricity is rapidly evolving. The hours that are critical for reliability are frequently not the highest load hours. Focusing on a handful of hours is inaccurate and misleading. The simplifying assumptions embedded in PRM algebra move the metric further away from reality every day. A measure that is detached from risk also creates potential for expensive waste and duplication. Simplifying away complexity is now a formula for higher bills and lights out.

A modern, probabilistic approach is more likely to show the type of success enjoyed by SRSG. Leaving behind the old, familiar simplifications will require trust. Accountability is important. Interactivity and diversity provide benefits. Please continue the effort and collaboration. I will contribute to any effort to develop modern resource adequacy programs.