

TO: Western Interstate Energy Board

FROM: Laura Rennick

DATE: September 15, 2025

SUBJECT: WIEB Annual Summary: August 2024-July 2025

WESTERN INTERSTATE ENERGY BOARD (WIEB)

This memo serves as an annual progress report on activities undertaken by the Western Interstate Energy Board (WIEB) and the committees that it supports over the past year. Additional information on the activities summarized in this report is available on <u>WIEB's website</u>.

WIEB LEADERSHIP ELECTIONS AND GOVERNOR APPOINTMENTS

- On August 28, 2025, WIEB representatives elected the following officers:
 - o WIEB Chair Maren Mahoney (Director, Arizona Governor's Office of Resiliency)
 - WIEB First Vice Chair Janine Benner (Director, Oregon Department of Energy)
 - WIEB Second Vice-Chair Dwayne McClinton (Director, Nevada Governor's Office of Energy)
 - WIEB Treasurer Emy Lesofski (Director, Utah Office of Energy Development)
- In past year, the following appointments were made to WIEB:
 - o Maren Mahoney, Director, Arizona Governor's Office of Resiliency
 - o Cally Younger, Administrator, Idaho Governor's Office of Energy and Mineral Resources
 - o Emy Lesofski, Director, Utah Office of Energy Development
 - o Glenn Blackmon, Director of the Energy Policy Office, Washington State Department of Commerce

WIEB NEW HIRES

Over the past year, WIEB has continued to build its team to meet the needs of the states. In November 2024, WIEB hired Sarah Hegge to fill a new position as Office Manager, providing crucial support to the operations of the organization. In July 2025, Anna Strange was hired to fill the position of Events and Communications Manager expanding capacity to not only facilitate various convenings and events, but also to improve and grow the communications from WIEB and the committees. Finally, and also in July 2025, Marissa Moers was hired to fill the role of Reliability Analyst to help support the work of WIRAB, expanding the capacity to track and analyze reliability issues in the Western Interconnection.

NUCLEAR ENERGY PROGRAM

WIEB convenes two nuclear energy program committees for states. The High-Level Radioactive Waste Committee began in the 1980s to engage in spent nuclear fuel and high-level radioactive waste transportation issues in eleven Western states. The Waste Isolation Pilot Plant Transportation Technical Advisory Group works with DOE to resolve issues related to the movement of defense-generated transuranic waste to the Waste Isolation Pilot Plant in New Mexico.

In September 2024, WIEB participated in a new style of Waste Isolation Pilot Plant (WIPP) transportation emergency preparedness exercise, called a WIPP Road-TREX, in three towns along Interstate 80 in Nevada. The Road-TREX, conducted in collaboration with DOE's Office of Environmental Management's Transportation Emergency Preparedness Program and DOE's Carlsbad Field Office (DOE-CBFO), featured classroom training in the morning followed by three drill-style exercises in the afternoon, with a concurrent tabletop exercise for local emergency response leadership. The Road-TREX was very well received by the participants; WIEB anticipates that more states will pursue this type of WIPP TREX in the future.

Also in September 2024, WIEB's High-Level Radioactive Waste Committee (HLRWC) submitted comments to DOE, the Washington State Department of Ecology, and the Environmental Protection Agency on the Hanford Holistic Agreement, the result of two years of federally mandated negotiations between the three entities that lays out many new milestones associated with the continued cleanup of the Hanford site in southeastern Washington state. The comments focus on the cleanup of high-level radioactive tank waste, which will have to be moved through some Western states for treatment and/or disposal under the new agreement.

In November of 2024, WIEB's HLRWC and Waste Isolation Pilot Plant Transportation Technical Advisory Group (WIPP TAG) held their fall meeting in San Luis Obispo, CA. During the meeting on the first day, discussion topics included the history of the WIPP transportation program in the West, led by the former HLRWC Chair, Ken Niles; and a look at federal preemption of state regulations under the Hazardous Materials Transportation Act. On day two, meeting attendees toured the Diablo Canyon Nuclear Generating Station, guided by Pacific Gas and Electric employees. The tour group viewed one of Diablo's breakwaters, which protects the water pumps and intake structure from any large waves, and which has also created a cove with unique marine life. In addition, the tour group walked on the turbine deck and experienced the training control room, an identical copy of the real control room where plant operators train on possible emergency scenarios.

In January 2025, the WIPP TAG submitted comments on DOE-CBFO's Legacy TRU [transuranic] Waste Disposal Plan, which DOE-CBFO was directed to create by the New Mexico Environment Department in the latest iteration of the New Mexico WIPP Hazardous Waste Facility Permit. The WIPP TAG encouraged DOE to prioritize any available inventories of TRU waste from the cleanup of legacy nuclear weapons production sites such as Los Alamos National Laboratory and the Hanford site before disposing of any so-called "surplus plutonium" in the WIPP panel reserved for legacy TRU waste.

In May 2025, WIEB hosted the National Transportation Stakeholders Forum (NTSF) Annual Meeting in Las Vegas, Nevada, bringing to a culmination many months of planning with the NTSF group members. The meeting format, meeting space, and presentations were very well received by attendees. In conjunction with the NTSF Annual Meeting, the HLRWC and WIPP TAG held their spring meeting, which included continued discussion of the planned 2027 shipment of the High Burnup Research Cask of spent nuclear fuel from the North Anna Nuclear Power Plant in Virginia to the Idaho National Laboratory in Idaho Falls. There was also discussion of planning for the resumption of TRU waste shipments from Hanford to WIPP, slated to begin again in 2028. In addition, some attendees were able

to tour the Nevada Nuclear Security Site, formerly known as the Nevada Test Site, which was used from 1951-1992 to conduct 100 atmospheric and 828 underground nuclear weapons tests. The craters and debris left over from these tests were a sobering reminder of nuclear weapons' destructive power.

COMMITTEE ON REGIONAL ELECTRIC POWER COOPERATION

The Committee on Regional Electric Power Cooperation (CREPC) is a joint standing committee of WIEB and the Western Conference of Public Service Commissioners. WIEB provides the staffing and support for CREPC.

In March 2025, CREPC leadership transitioned to two new co-chairs: James Lester, Senior Advisor at the Colorado Energy Office, and Gabriel Aguilera, Chair of the New Mexico Public Regulation Commission.

CREPC, along with WIRAB, successfully hosted the Spring 2025 Joint CREPC-WIRAB meeting in San Diego, California, and began preparations for the Fall 2025 Joint CREPC-WIRAB meeting in Portland, OR.

WIEB activities supported by a subcontract with the National Renewable Energy Laboratory (NREL) continued during this period. Under this agreement with NREL, in April 2025, WIEB extended its contract with AESL Consulting to continue their support of the Markets+ State Committee through September 2025. Funding for the AESL contract will be transferred to the MSC budget funded through Phase II of Markets+ by the end of September in order to continue support to the MSC. The NREL subcontract includes funding for WIEB staff to attend regional conferences such as NARUC and NASEO, funding for staff support of the CREPC Transmission Collaborative, and strengthens WIEB's support of CREPC regional electricity efforts and collaboration with the U.S. Department of Energy. WIEB's subcontract with NREL is set to expire on April 25, 2026, and DOE has indicated that it will not be renewed.

WIEB's Cooperative Agreement with the U.S. Department of Energy's Grid Deployment Office received approval of its Budget Year 2 funding in April 2025. The total agreement term is for five years and supports the joint CREPC-WIRAB meetings as well as a WIEB Leadership Delegation trip to Washington, D.C., to meet with officials from DOE and FERC. The Cooperative Agreement also includes funding for a Markets and Resource Adequacy Analyst with WIEB. In Years 1 and 2, the Cooperative Agreement supported CREPC's work with Energy Strategies on the "State Exploration of Western Transmission Cost Allocation Frameworks" study. The final technical report and final policy brief were published in August 2025.

In addition to finalizing the Energy Strategies study, the CREPC Transmission Collaborative (CREPC TC) continued to facilitate state and provincial representation and feedback in the Western Transmission Expansion Coalition ("WestTEC") effort being facilitated by the Western Power Pool, and discussed other transmission issues as they arose, including receiving updates on The Western Transmission Consortium as that effort evolves and starts to identify transmission projects for development.

The CREPC 1920 Ad Hoc Committee continued to convene the Regional State Entities (RSEs) in WestConnect and NorthernGrid to discuss requirements around regional planning transmission cost allocation. The committee drafted a proposal around the structure of a State Agreement Process (i.e., what triggers it, what are the deadlines for decisions once a project is identified, what constitutes "agreement", etc.) that would allow states to develop an alternative cost allocation methodology after a project is selected for cost allocation within a regional plan, reviewed and discussed the regional planning organization's proposals for a default *ex ante* methodology that would apply to all projects selected for cost allocation absent the states reaching agreement on an alternative method, and began discussions on the potential for a state-proposed *ex ante* methodology that the utilities would be required to file at FERC alongside their own preferred method.

OTHER WIEB PROJECTS, PARTNERSHIPS, AND INITIATIVES

WIEB'S RESERVE EXPENDITURE PROGRAM

The WIEB Board adopted the Reserve Expenditure Program (REP) on July 27, 2017. Under the REP, the Board invites member states and provinces to propose studies on energy and non-energy projects. The dual purpose of the REP is to attain a targeted level of financial reserves and produce useful studies and projects for WIEB's member states and provinces.

As of August 2025, WIEB has completed 9 REP projects since 2021. One project was completed over the last year: Greenhouse Gas Accounting and Reporting in the Western States.

From December 2024 to February 2025, WIEB hosted a <u>two-part webinar series</u> on greenhouse gas accounting and reporting across the Western Interconnection. The series was designed to enhance collaboration and understanding of GHG accounting and reporting principles, requirements, voluntary programs, market mechanisms, and regional coordination. The first webinar, "GHG Accounting and Reporting in the Western States," held on December 16, 2024, provided a platform for industry representatives to discuss regional trends and examine GHG practices across the West. The second webinar, "State policies, Approaches, and coordination, for GHG Reporting and Accounting," held on February 16, 2025, focused on state and provincial specific policies, both within their own jurisdictions and across the broader region. The project brought together state and provincial energy office directors and staff, utility commissioners and staff, air quality regulators, and industry stakeholders to address the intersection of GHG policy, market development, and regional coordination.

Two other REP projects are in progress: Electrification Trends in Western States and the Challenges and Opportunities of Large Industrial Electricity Loads. These projects will be completed in the coming year.

WIEB staff intends to announce a new round of study requests for REP projects in the fall of 2025.

SHULTZ ENERGY FELLOWSHIP

In 2024, WIEB hosted two Shultz Energy Fellows from Stanford University. The fellows analyzed transmission use and congestion in the Western states. Using publicly available Locational Marginal Price (LMP) data, the fellows analyzed trends in congestion and transmission usage across the Western Energy Imbalance Market. They shared their findings with regulators, policymakers, and stakeholders across the region with the intent to enhance the understanding of the Western transmission system and provide meaningful insight to incorporate into resource planning, transmission planning, and cost allocation analysis. The presentation can be found here.

WIEB welcomed the 2025 Shultz Energy Fellows this June. This summer's fellows investigated existing resource adequacy frameworks and reliability challenges in the Western Interconnection. Through stakeholder interviews, they analyzed the California Public Utilities Commission's Slice-of-Day and the Western Power Pool's Western Resource Adequacy Program, comparing program requirements and methodologies, and learning stakeholder perspectives to better understand challenges related to regional coordination, resource planning, and implementation, particularly in the context of expanding regional markets. Their work culminated in a presentation which is available here.

WEST-WIDE GOVERNANCE PATHWAYS INITIATIVE

In July 2023, several state commissioners sent a letter to WIEB and CREPC leadership to propose "the creation of an entity that could serve as a means for delivering a market that includes all states in the Western Interconnection, including California, with independent governance," known as The West-Wide Governance Pathways Initiative. In October 2023, with the help of the Regulatory Assistance Project, a Launch Committee was formed. WIEB staff continues to monitor committee meetings and have provided a landing page to host materials for the Pathways initiative on its website. In 2024, the Launch Committee submitted, and the California ISO Board of Governors and Western Energy Markets (WEM) Governing Body approved, a proposal to change the California ISO governance structure to implement the Pathways Step 1 proposal. The Step 1 proposal moves the California ISO's Western Energy Imbalance (WEIM) and Extended Day-Ahead Market (EDAM) markets to a "primary authority" model. Under this model, a proposal is sent to the WEM Governing Body first for review and approval, and if approved (by majority vote) it would be placed on a consent agenda for the California ISO Board of Governors. The Board would then have the option to simply approve the consent agenda item or remove the matter from the consent agenda for a full discussion of the proposal. The Step 1 proposal also included a modification to the dispute resolution process at FERC to include a dual-filing option. Under this dual filing option, which would be available only after an initial proposal is not approved and staff conduct a stakeholder process to review a possible alternative, the two bodies could each approve a different proposal. In that case, the two proposals would be filed at FERC as "co-equal" proposals in a single document, with neither option presented as preferred over the other. FERC could then approve either proposal or potentially adopt elements of each proposal. The design is modeled off of the ISO-New England approach, which is also known as a "jump ball" approach. The Step 1 design took effect July 1, 2025, once certain trigger criteria were satisfied that relate to the collective entities committed to EDAM. The Pathways initiative is now in Step 2 of the overall process, which establishes the details and governing documents of the new Regional Organization (RO) that would oversee CAISO's WEIM and EDAM. In order for Step 2 to be implemented, legislation in California must be passed to transition the California ISO's governance to the independent RO. On September 13, California lawmakers passed the landmark bill to begin this transition. The WEM Body of State Regulators (BOSR) has been actively in tracking and providing input on these developments that will impact state regulators.

WESTERN INTERCONNECTION REGIONAL ADVISORY BODY

During this reporting period, WIRAB was led by:

- Chair: Commissioner Mary Throne, Wyoming Public Service Commission
- Vice-Chair: Commissioner Lea Márquez Peterson, Arizona Corporation Commission

In 2024, WIRAB partnered with Elevate Energy Consulting to complete an <u>Inverter-Based Resource (IBR) Risk Assessment Report</u>. The report offered a comprehensive analysis of past and current efforts to integrate IBRs, identified reliability risks and gaps, and proposed regulatory and policy recommendations to support a more reliable and resilient Western Interconnection. In November 2024, WIRAB formally endorsed the report and began working with WECC and stakeholders to prioritize implementation of the recommendations.

To advance one of the report's key recommendations, WIRAB submitted formal *Advice to FERC* in March 2025 in response to the *Notice of Proposed Rulemaking (NOPR)* in Docket No. RM25-3-000, which proposed updates to NERC Reliability Standards PRC-024-4 and created a new standard PRC-029-1 addressing frequency and voltage protection settings and ride-through requirements for IBRs. In July 2025, FERC approved the standards, incorporating some of WIRAB's recommendations.

Building on this momentum, WIRAB launched a new initiative in May 2025: the *Industry Advisory Group (IAG)* on *Harmonizing IBR Interconnection Requirements in the West*. This project addresses another major recommendation from the IBR Risk Assessment Report, developing a standardized Facility Interconnection Requirements (FIR) template. The IAG, composed of industry stakeholders, meets monthly and will deliver a publicly available FIR template by the end of 2025 to support more consistent and effective IBR interconnection practices across the Western Interconnection.

In addition to its IBR-focused efforts, WIRAB remained engaged in WECC governance and strategic planning. Key activities included:

- Providing Advice to WECC on its <u>Long-Term Strategy</u> and <u>2026 Business Plan and Budget</u>;
- Participating directly in WECC's Organizational Review under Section 4.9 of the WECC Bylaws. This review
 resulted in proposed bylaw revisions to streamline governance and reinforce WECC's focus on reliability.
 The revised bylaws are expected to be approved in Q3 2025.

On **August 1, 2025**, Commissioner Mary Throne stepped down from WIRAB following her departure from Wyoming state government. On **August 5, 2025**, WIRAB elected new leadership:

- Chair: Commissioner Lea Márquez Peterson, Arizona Corporation Commission
- Vice-Chair: Commissioner Siva Gunda, California Energy Commission

STATE AND PROVINCIAL COMMITTEES

WESTERN ENERGY MARKETS BODY OF STATE REGULATORS

The Western Energy Market (WEM) Body of State Regulators (BOSR) continues to be actively engaged in California ISO activities that impact the Western Energy Imbalance Market (WEIM) and Extended Day-Ahead Market (EDAM). Members have spent much of the last six months understanding the complexities of two market initiatives that took place this year: 1) Price Formation Enhancements and 2) EDAM Congestion Revenue Allocation. The committee also spent time understanding the Greenhouse Gas Reporting and Accounting Framework currently proposed for states that have GHG policies and compliance programs, while respecting states that do not.

At the BOSR's October 2024 meeting in San Diego, the BOSR elected Chair Gabriel Aguilera of the New Mexico Public Regulation Commission to Chair of the BOSR and Commissioner John Hammond of the Idaho Public Utilities Commission to Vice-Chair.

In December 2024, the BOSR hosted a virtual Western Electricity Markets Training Forum with Stanford professors Frank Wolak and Mark Thurber, as well as the California ISO. Participants walked through game-based wholesale electricity market simulations that covered the topics of auction pricing fundamentals, market power, the effects of transmission constraints on prices, settlements, and the role of the day-ahead market.

The Western Energy Markets Nominating Committee, of which Vice-Chair Hammond is the BOSR representative, assembled this spring to address two vacancies on the Western Energy Markets Governing Body: Governing Body members John Prescott and Andrew Campbell both had terms that expired June 30,2025. The WEM Governing Body announced the reappointment of Governing Body Member Campbell and elected Deborah Smith to fill the seat vacated by John Prescott. Deborah Smith has been a respected leader in the utility sector for nearly 30 years and was most recently the CEO at Seattle City Light. The Governing Body named Rebecca Wagner the Chair and Andrew Campbell as Vice-Chair.

BOSR has also been actively engaged in the West-Wide Governance Pathways Initiative, specifically focusing on the work toward establishing a new Regional Organization (RO). Now that the Pathways Step 2 process will proceed, BOSR will remain heavily engaged in this effort as the region works to establish the details of the RO tariff.

MARKETS+ STATE COMMITTEE

Since the filing of the Markets+ Tariff at the Federal Energy Regulatory Commission in March 2024, the Markets+ State Committee (MSC) continues to be actively engaged in the Markets+ development process, participating in the various working groups and task forces as the Southwest Power Pool (SPP) and stakeholders began work on the Markets+ Protocols.

At the Spring 2024 Joint CREPC-WIRAB Meeting, the MSC met in executive session to finalize their policy positions in relation to the Markets+ Tariff. The comments submitted by the MSC to the Federal Energy Regulatory Commission (FERC) can be found here. The MSC followed the Tariff review process throughout 2024 when FERC requested additional information from SPP in a letter sent on July 31, 2024. Many of the issues raised by FERC were described in the MSC's original comments. On January 16, 2025, FERC approved the Markets+ Tariff.

At the Fall 2024 Joint CREPC-WIRAB Meeting, the MSC reviewed their 2025 Business Plan and Budget (BP&B) and discussed the process for WIEB to secure funding from SPP. Since the MSC's funding is allocated to all Markets+ Market Participants, the Chair of the MSC and WIEB Staff presented the 2025 BP&B to the Markets+ Participant Executive Committee (MPEC) for their review before a final presentation to and request for approval from the Interim Markets+ Independent Panel (IMIP). The drafting and review process of the 2025 BP&B was successful, and the 2025 BP&B was presented to the MPEC in April 2025 at their quarterly meeting and approved by the IMIP in May 2025. A Memorandum of Understanding (MOU) was executed and approved by WIEB and SPP in July 2025 to solidify the funding process.

Throughout 2025, the MSC has been engaged with the Markets+ Interim Governance Task Force (MIGTF) to review Markets+ governance ahead of Phase 2. At the Spring 2025 Joint CREPC-WIRB meeting, the MSC met in executive session to address some governance issues raised by members, particularly on the issue of the MIP member election process. Following the meeting, the MSC worked with the MIGTF leadership to draft a request for the MPEC direct the MIGTF to undertake the review of the MIP member election process. This would include reviewing the MPEC's approval process and investigating whether it is feasible to add criteria or other guidelines for a MPEC member and/or sector to a MIP member or slate put forth by the Markets+ Nominating and Governance Task Force (MNGC). This issue remains ongoing.

WESTERN RESOURCE ADEQUACY PROGRAM COMMITTEE OF STATE REPRESENTATIVES

Throughout fall 2024 and into 2025, the Western Resource Adequacy Program (WRAP) Committee of State Representatives (COSR) has been actively engaging in the WRAP stakeholder process following the announcement of WRAP Participants to delay the first binding season and work through Participant challenges with the transition as outlined in the Revised Transition Plan (RTP). The Resource Adequacy Participants Committee (RAPC) completed the RTP in August of 2024, and the COSR endorsed the RTP in comments filed in September 2024 on the WPP website here. The WPP Board of Directors endorsed the RTP and tariff changes at their meeting on September 24, 2024, and FERC has since approved the RTP.

The COSR has also been working through a request for more programmatic data ahead of the Forward Showing (FS) seasons. COSR staff filed a formal request to the RAPC, and individual members will be following up with their

respective State-Regulated WRAP Participants for more information. The COSR and RAPC met in a joint closed session in July 2025 for a more in-depth discussion and presentation on the Summer 2025 data. It is anticipated that these joint COSR-RAPC sessions will occur on a semi-regular basis to bolster committee relationships and interaction ahead of the FS seasons.

In April 2025, the Program Review Committee (PRC), with member input, put forth a workplan for what they will undertake for the remainder of the year and into 2026. The COSR weighed in on the prioritization exercise at the inperson PRC meeting in January 2025. Throughout 2025, the PRC will be focusing on: Load Growth Factor, Day-Ahead Market Optimization, CAISO Transmission, and Demand Response. Three (3) WRAP Task Forces have also been created that the COSR will track: Day-Ahead Market, Planning Reserve Margin, and CAISO Transmission.

MEETINGS AND EVENTS

RECENT MEETINGS

FALL 2024 JOINT CREPC-WIRAB MEETING

Fall 2024 Joint CREPC-WIRAB Meeting Page

The Fall 2024 Joint CREPC-WIRAB Meeting was held in San Diego, CA, from Wednesday, October 22, to Friday, October 24, 2024. Agenda topics included wholesale electricity markets, resource adequacy, transmission, and emerging technologies.

SPRING 2025 JOINT CREPC-WIRAB MEETING

Spring 2025 Joint CREPC-WIRAB Meeting Page

The Spring 2025 Joint CREPC-WIRAB Meeting was held in San Diego, CA, from Wednesday, April 2, to Friday, April 4, 2024. Agenda topics included wholesale electricity markets, resource adequacy, transmission, and emerging technologies.

UPCOMING MEETINGS

FALL 2025 JOINT CREPC-WIRAB MEETING
October 1-3, 2025
Hilton Portland Downtown, Portland, OR

Fall 2025 Joint CREPC-WIRAB Meeting Page