



**Western Interconnection  
Regional Advisory Body**

**2027 Business Plan and Budget**

**June 18, 2026**

**Approved by  
Appointed Members of the  
Western Interconnection Regional  
Advisory Body**

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## Introduction

The proposed 2027 budget for the Western Interconnection Regional Advisory Body (WIRAB) totals \$882,845, representing an increase of \$20,365 or 2.4% over the approved 2026 budget. This increase is slightly less than the 3.3% increase projected for 2027 in the 2026 Business Plan and Budget.

Total proposed staffing for 2027 remains unchanged at 3.0 full-time equivalents (FTEs), with only internal allocation adjustments. The primary driver of the budget increase is slightly higher personnel costs, reflecting standard 4% cost-of-living and merit adjustments, as well as the strategic labor allocation of a Deputy Director for a total increase of \$15,319 or 5.3%. Indirect expenses increased by \$5,046 or 1.8% due to higher personnel costs; however, the indirect rate declined from 96.8% in 2026 to 93.6% in 2027. Meeting, travel, and contractual/consulting expenses remain flat.

WIRAB's total funding requirement for 2027 is \$711,845, calculated as total statutory expenses of \$882,845 less \$171,000 in required statutory working capital. The proposed funding assessment is \$709,845, an increase of \$3,765 or 0.5% over the 2026 assessment. This modest increase supports assessment stability and helps avoid significant funding fluctuations in future budget periods. The assessment increase is significantly lower than the 2.6% projected for 2027 in the 2026 Business Plan and Budget.

The 2027 funding assessment includes the use of \$171,000 in working capital reserves. WIRAB proposes to allocate the funding assessment at \$603,165 or 85% to the U.S. portion and \$106,680 or 15% to the Canadian portion.

Table 1. WIRAB Resources for 2027

| WIRAB - Total Resources<br>(in whole dollars)    | 2027 Budget  | U.S.        | Canada      | Mexico |
|--------------------------------------------------|--------------|-------------|-------------|--------|
| Statutory FTEs*                                  | 3.00         |             |             |        |
| Non-statutory FTEs                               |              |             |             |        |
| <b>Total FTEs</b>                                | 3.00         |             |             |        |
| Statutory Expenses                               | \$ 882,845   |             |             |        |
| Non-Statutory Expenses                           |              |             |             |        |
| <b>Total Expenses</b>                            | \$ 882,845   |             |             |        |
| Statutory Inc(Dec) in Fixed Assets               |              |             |             |        |
| Non-Statutory Inc(Dec) in Fixed Assets           |              |             |             |        |
| <b>Total Inc(Dec) in Fixed Assets</b>            | \$ -         |             |             |        |
| Statutory Working Capital Requirement            | \$ (171,000) |             |             |        |
| Non-Statutory Working Capital Requirement        | 0            |             |             |        |
| <b>Total Working Capital Requirement</b>         | \$ (171,000) |             |             |        |
| Total Statutory Funding Requirement              | \$ 711,845   |             |             |        |
| Total Non-Statutory Funding Requirement          | \$ -         |             |             |        |
| <b>Total Funding Requirement</b>                 | \$ 711,845   |             |             |        |
|                                                  |              |             |             |        |
| <b>Statutory Funding Assessments<sup>1</sup></b> | \$ 709,845   | \$ 603,165  | \$ 106,680  | \$ -   |
| <b>Non-Statutory Fees</b>                        |              |             |             |        |
| NEL**                                            | 882,447,179  | 749,827,047 | 132,620,132 | -      |
| NEL%                                             | 100.0%       | 85%         | 15%         | 0.0%   |

\* Full time equivalent

\*\*Net energy for load

<sup>1</sup> The allocation of the statutory assessments was updated to reflect NEL data on August 4, 2026.

## Organizational Overview

The Federal Energy Regulatory Commission (FERC or Commission) created WIRAB in April 2006, upon petition of ten Western Governors and in accordance with Section 215(j) of the Federal Power Act (FPA). The Governors invited all U.S. states, Canadian provinces, and Mexican jurisdictions with territory in the Western Interconnection to join WIRAB and to participate in WIRAB's activities as a regional advisory body charged with advising FERC, the North American Electric Reliability Corporation (NERC), and the Regional Entity (i.e., the Western Electricity Coordinating Council or WECC) on matters of electric grid reliability.

In July 2006, FERC issued an order granting the Governors' petition to establish WIRAB.<sup>2</sup> In its order, FERC determined that WIRAB should receive funding for its Section 215(j) activities and directed WIRAB to annually develop a budget and related information for submittal through the Electric Reliability Organization (ERO) budget approval process. The Commission instructed WIRAB to develop a budget in a form similar to that specified for regional entities as set forth in Order 672.<sup>3</sup> FERC also required WIRAB to identify the portion of its funding to be received from Canada and Mexico.

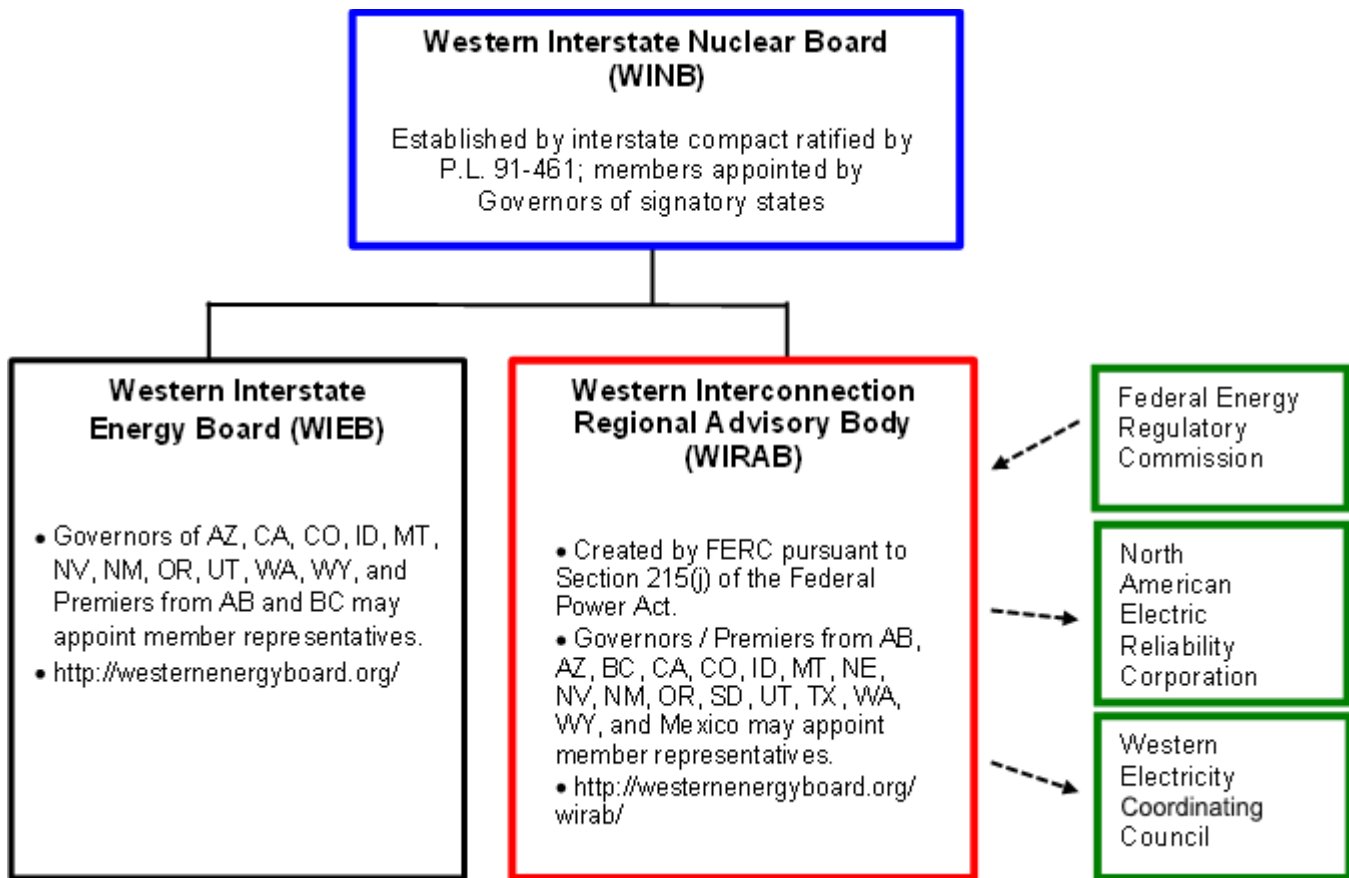
The Governors created WIRAB as a standing advisory committee to the Western Interstate Nuclear Board (WINB), which was formed pursuant to the Western Interstate Nuclear Compact, P.L. 91-461. WIRAB has the same status under the compact as the Western Interstate Energy Board (WIEB). Below is a chart that illustrates these organizational relationships.

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<sup>2</sup> Order on Petition to Establish a Regional Advisory Body for the Western Interconnection, 116 FERC ¶ 61,061, Docket No. RR06-2-000, July 20, 2006.

<sup>3</sup> Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of Reliability Standards, Order 672, Docket RM05-30-000, Feb. 3, 2006, P. 228. "Each Regional Entity must submit its complete business plan, entire budget, and organizational chart to the ERO for it to submit to the Commission. The complete business plan and the entire budget will provide the Commission with necessary information about any non-statutory activities, the source of their funding, and whether the pursuit of such activities presents a conflict of interest for the Regional Entity. For a Cross-Border Regional Entity, this information will also inform the Commission as to what portion of the budget is expended upon activities within the United States."

Figure 1. Organizational Relationships



## Membership and Governance

All U.S. states with territory in the Western Interconnection (Arizona, California, Colorado, Idaho, Montana, Nebraska, Nevada, New Mexico, Oregon, South Dakota, Texas, Utah, Washington, and Wyoming) the Canadian provinces of Alberta and British Columbia, and the Mexican state of Baja California are eligible to appoint members to WIRAB. Member representatives of WIRAB are appointees of the respective Governors and Premiers, or representative-designated alternates. Below is the list of current WIRAB member representatives (as of April 1, 2026):

Figure 2. WIRAB Membership List

| WIRAB Member Representatives |                      |                                                                                                                  |                  |
|------------------------------|----------------------|------------------------------------------------------------------------------------------------------------------|------------------|
| State/Province               | Name                 | Title/Agency                                                                                                     | WIRAB Leadership |
| Alberta                      | Sandy Lee            | Director, Generation, Transmission and Markets Policy, Utilities, Alberta Affordability and Utilities            |                  |
| Arizona                      | Lea Marquez Peterson | Commissioner, Arizona Corporation Commission                                                                     | Chair            |
| British Columbia             | Chris Gilmore        | Assistant Deputy Minister, Electricity and Utility Regulation Division, Ministry of Energy and Climate Solutions |                  |
| California                   | Siva Gunda           | Vice Chair, California Energy Commission                                                                         | Vice-Chair       |
| Colorado                     | James Lester         | Senior Policy Lead on Transmission, Climate and Energy, Colorado Energy Office                                   |                  |
| Idaho                        | Cally Younger        | Administrator, Idaho Governor's Office of Energy and Mineral Resources                                           |                  |
| Mexico                       | Vacant               |                                                                                                                  |                  |
| Montana                      | Sonja Nowakowski     | Director of the Montana Department of Environmental Quality                                                      |                  |
| Nebraska                     | Tim Texel            | Executive Director, Nebraska Power Review Board                                                                  |                  |
| Nevada                       | Vacant               |                                                                                                                  |                  |
| New Mexico                   | Vacant               |                                                                                                                  |                  |
| Oregon                       | Janine Benner        | Director, Oregon Dept of Energy                                                                                  |                  |
| South Dakota                 | Jon Thurber          | Utility Analyst, South Dakota Public Utilities Commission                                                        |                  |
| Texas                        | Vacant               |                                                                                                                  |                  |
| Utah                         | Emy Lesofski         | Director, Utah Office of Energy Development                                                                      |                  |
| Washington                   | Elizabeth Osborne    | Senior Energy Policy Analyst, Washington State Energy Office                                                     |                  |
| Wyoming                      | Chris Petrie         | Commissioner, Wyoming Public Service Commission                                                                  |                  |

WIRAB holds two in-person meetings each year, usually in Spring and Fall. These meetings are open to the public. WIRAB also holds monthly open conference calls to discuss current and emerging issues and hosts periodic webinars with presentations from subject matter experts on key electric grid reliability topics.

## Statutory Functional Scope

FERC established WIRAB as a Regional Advisory Body under section 215(j) of the FPA. The language in Section 215(j) specifically provides for WIRAB's authority to advise FERC, NERC, and WECC on whether reliability standards, budgets and fees, governance, compliance, assessments, strategic direction, and other activities conducted pursuant to Section 215 are just, reasonable, not unduly discriminatory, or preferential, and in the public interest.

WIRAB's advice to FERC, NERC, and WECC can be grouped into four categories that are appropriately funded under Section 215 of the FPA, including:

1. Governance and Strategic Planning;
2. Emerging Trends and System Risks;
3. Periodic Reliability Assessments; and
4. Reliability Standards and Proactive Enforcement.

WIRAB's activities in each of these categories are described in Section A – Statutory Activities.

## 2027 Strategic Initiatives

The Western Interconnection is vital to the region's economy and the well-being of its people. It serves a population of nearly 90 million, and electricity is increasingly central to meeting the demands of everyday life. While energy efficiency has reduced growth in some traditional electricity uses, the electrification of transportation and homes and the rapid expansion of energy-intensive industries, including data centers and other large loads, are introducing new dynamics to the system. Historically, electricity supply and demand were relatively predictable, but today demand is growing, and supply is becoming more variable, and accompanied by increasing expectations for reliable service.

At the same time, the generation resource mix used to meet these demands continues to evolve. Environmental policies, market dynamics, technological innovation, and the retirement of aging infrastructure are reshaping the Western power system. Inverter-based resources such as solar photovoltaics continue to experience rapid growth, particularly in California and the Desert

Southwest, while utility-scale wind continues to expand in regions with strong wind resources. These developments require long-distance transmission infrastructure to connect generation to population centers. In addition, energy storage technologies, such as battery storage and emerging long-duration energy storage, are playing an increasingly important role in supporting the integration of weather-dependent resources. Natural-gas infrastructure continues to play an important role in providing both energy and flexibility for the electric system. Meanwhile, the continued retirement of traditional thermal generation, including coal, is altering system operations and requiring new approaches to ensure reliability.

The Western Interconnection also faces increasing challenges from extreme natural events. Wildfires, droughts, prolonged heat waves, and periods of extreme cold are affecting both grid infrastructure and system operations. These environmental risks complicate utility planning and operations while many jurisdictions incorporate climate and environmental considerations into energy infrastructure decisions. Ensuring the continued reliability of the grid amid these evolving conditions remains a critical priority.

Transmission planning, siting, and development are essential to maintaining a reliable and resilient grid in the West. As the resource mix evolves and the system grows more complex, adequate transmission infrastructure is necessary to deliver electricity to where it is needed, maintain system stability, and manage congestion. Planning and developing new and upgraded transmission lines will be critical to integrating new generation resources, serving new loads, and maintaining reliability across the region.

Grid modernization efforts present both opportunities and challenges. The continued growth of distributed energy resources, such as rooftop solar, highlights the need for improved coordination between Bulk Power System operators and distribution system operators. At the same time, integrating new technologies designed to enhance efficiency and reliability may introduce new operational complexities and potential vulnerabilities. Continued research, development, deployment, and understanding of advanced technologies and operational tools will be necessary to support reliability. Ensuring the cyber and physical security of critical grid infrastructure across the Western Interconnection is also essential.

Finally, the evolving structure of Western electricity markets presents both opportunities and challenges for reliability. The West now has three organized wholesale electricity markets

(CAISO, SPP RTO West, and AESO) and two energy imbalance markets with day-ahead services. Emerging regional market structures will change how electricity is scheduled, dispatched, and delivered across the West. At the same time, efforts to coordinate resource adequacy across large portions of the region are advancing, potentially reshaping how utilities and system operators demonstrate their ability to reliably meet customer demand.

In light of these developments, WIRAB has identified a set of strategic initiatives for 2027 that encourage WECC, the Electric Reliability Organization (ERO), and industry stakeholders to address emerging reliability risks and opportunities. Through these initiatives, WIRAB aims to support a reliable and resilient electric grid in the Western Interconnection and ensure that WECC and its stakeholders remain well positioned to navigate the evolving energy landscape in the West.

***Initiative 1: (Gas-Electric Coordination) Advise WECC on Interdependencies Between the Natural Gas and Electric Systems and the Implications for the Reliable Operation of the Western Interconnection.***

The natural gas and electric systems in North America are increasingly interdependent. Natural-gas-fired generation now represents a significant share of the resource mix used to meet electricity demand, particularly as coal generation retires and variable renewable resources grow. As a result, the reliability of the bulk power system (BPS) is increasingly influenced by the performance of natural gas production, transportation, and storage infrastructure.

In addition, a broader set of resources, including demand-side flexibility, energy efficiency, energy storage, and hybrid resource configurations, are playing an increasingly important role in shaping system operations and peak demand. These resources may reduce or shift reliance on natural gas generation under certain conditions, while also introducing new operational interdependencies that should be reflected in gas-electric coordination analysis.

In the Western Interconnection, this relationship has evolved significantly over the past decade. In 2018, WECC commissioned a comprehensive study of the gas-electric interface to evaluate risks associated with growing reliance on natural gas generation. The study found that the retirement of baseload generation combined with increasing renewable penetration would likely increase reliance on natural gas resources for both energy and system flexibility. It also identified vulnerabilities related to gas infrastructure disruptions, pipeline constraints, and limited gas storage

in certain regions of the West.

Since that study was completed, the Western electric system has undergone substantial change. The resource mix now includes significantly higher penetrations of variable inverter-based resources (IBRs), additional thermal retirements, and evolving operational patterns that place greater emphasis on flexible generation to manage variability and ramping needs. Additionally, large load growth and electrification are causing rapid changes in demand. At the same time, extreme weather events have highlighted the vulnerability of both the gas and electric systems during periods of simultaneous stress. These events demonstrate how fuel supply constraints, infrastructure outages, or operational misalignment between the two systems could affect reliability across wide areas of the Western Interconnection.

Recognizing these changes, WECC has begun planning for an updated gas-electric interdependency assessment to examine how the relationship between the two systems has evolved over the past decade and to identify emerging reliability risks. This effort provides an opportunity for state and provincial regulators to ensure that the analysis reflects current system conditions, operational realities, and policy developments shaping the region's energy future.

The goals of this initiative include:

- Supporting WECC's updated gas-electric interdependency study and ensuring it reflects current system conditions, including higher penetrations of inverter-based resources, accelerating thermal retirements, and the growing role of demand-side flexibility, energy efficiency, and energy storage in shaping net load and peak demand.
- Encouraging WECC to incorporate a full portfolio of supply- and demand-side resources in interdependency modeling, including demand response, flexible loads, energy efficiency, and storage, to better evaluate the evolving role of natural gas within the broader resource mix and avoid over-reliance on any single resource type.
- Encouraging analysis that evaluates how disruptions in natural gas infrastructure, such as pipeline outages, supply constraints, or extreme weather impacts, could affect the reliable operation of the Bulk Power System.
- Coordinating with large load flexibility efforts, to assess how flexible demand from large loads

may influence both electric system operations and natural gas system requirements.

- Ensuring study findings are translated into practical insights and guidance for state and provincial energy offices on planning coordination between gas and electric infrastructure.
- Identifying operational, planning, or regulatory gaps at the gas-electric interface that may warrant new or updated NERC reliability standards, regional reliability guidance, or improved industry coordination practices.

To achieve these goals, WIRAB staff will:

- Participate in WECC technical forums and stakeholder processes supporting the updated gas-electric interdependency study.
- Encourage engagement from state and provincial policymakers to ensure the study addresses reliability issues most relevant to the states and provinces.
- Review study assumptions, scenarios, and modeling approaches to ensure they reflect emerging operational conditions in the Western Interconnection.
- Facilitate dialogue between WECC, NERC, regulators, and industry stakeholders on potential reliability risks identified at the gas-electric interface.
- Communicate key findings and policy implications to WIRAB members and support discussions on potential actions to strengthen reliability planning and coordination across the region.

Through this initiative, WIRAB will help ensure that WECC's work on gas-electric coordination provides actionable insights that support informed policymaking and help maintain the reliable operation of the Western Interconnection as the energy system continues to evolve.

***Initiative 2: (Large Load Integration) Advise WECC and States to Address the Reliability Risks of Resource Procurement Competition Associated with Behind-the-Meter and Co-Located Resources at Large Load Facilities.***

The Western Interconnection is experiencing substantial and accelerating electric load growth driven by the proliferation of large loads. Data centers and other computational load entities

are connecting to the bulk power system faster and at greater scale than at any prior point in the interconnection's history. While this growth supports economic and regional policy goals, it presents significant reliability challenges, particularly where the pace of load development exceeds the capacity of existing frameworks to plan for, interconnect, and oversee these resources.

Demand across the Western Interconnection is expected to grow 25 percent over the next decade. The Basin and Northwest subregions face the most acute resource adequacy risk, with loss of load projected in both subregions even if all planned resources come online. Critically, 80 percent of planned resource additions in those subregions are Tier 3 speculative resources, lacking a signed interconnection agreement or power purchase agreement.

Regulated utilities in these high-risk subregions are competing in a constrained resource market to procure the contracted capacity needed to meet native load obligations and resource adequacy requirements. Computational load entities and other large load developers are increasingly active in the same market. Current assessment frameworks do not capture this competition, potentially understating the adequacy risk facing regulated utilities and their customers.

The procurement competition dynamic is compounded by the growing presence of behind-the-meter (BTM) and co-located generation and energy storage resources at large load facilities. These configurations interact with the BPS in ways that balancing authorities, reliability coordinators, and transmission planners cannot fully observe. NERC has identified this visibility gap as a significant reliability risk and has documented more than 1,000 MW of unexpected large load reductions across multiple BPS disturbance events in 2024 and 2025. At scale, their aggregate effect on net load variability, frequency response, and voltage stability becomes material to interconnection-wide reliability.

Western utilities, transmission providers, and regulators are operating without consistent guidance on BTM visibility, co-location treatment, or the reliability implications of large load resource acquisition on utility planning and operations. Through this initiative, WIRAB will encourage WECC and Western states to address the reliability risks of resource procurement competition between regulated utilities and large technology companies and to develop requirements for BTM visibility and co-location treatment at large load facilities.

The goals of this initiative include:

- Encouraging WECC to assess the frequency, magnitude, and geographic concentration of resource procurement competition between computational load entities and regulated utilities, with particular attention to high-risk subregions identified in the Western Assessment of Resource Adequacy.
- Advising WECC to identify whether current resource adequacy assessment methodologies require modification to reflect the distinction between resources serving native load and those dedicated to large load facilities.
- Ensuring WECC's engagement with utilities and regulators addresses whether existing state interconnection rules, integrated resource planning processes, and planning tools are adequate to manage the reliability risks introduced by large load participation in resource procurement.
- Advising WECC to identify what visibility, data sharing, and registration requirements should apply to BTM and co-located resources above a material BPS impact threshold.
- Encouraging WECC to develop interconnection and operational guidance or standards that account for the reliability implications of co-located generation and storage at large load facilities.

To achieve these goals, WIRAB staff will:

- Engage with WECC's Reliability Assessment Committee (RAC), NERC's Large Load Working Group, and related Reliability and Security Technical Committee (RSTC) bodies to monitor developments related to procurement competition dynamics, BTM resource visibility, and co-location treatment.
- Encourage WECC to study the reliability implications of large load resource acquisition at the interconnection and subregional level and make findings available to state and provincial energy offices and utility commissions.
- Monitor FERC's large load interconnection rulemaking and co-location proceedings and identify where Western-specific guidance may be warranted in advance of or in complement to national regulatory action.

- Participate in WECC technical committee processes to assess whether existing interconnection agreements and adequacy reporting requirements are adequate to manage the resource adequacy risks introduced by procurement competition.
- Host briefings and discussions to engage WIRAB members and Western regulators on procurement competition dynamics and BTM and co-location challenges in the Western Interconnection.

Through this initiative, WIRAB will help ensure that resource adequacy assessments, interconnection frameworks, and regulatory oversight in the Western Interconnection account for the reliability risks posed by large load resource procurement competition and the growing presence of behind-the-meter and co-located resources at large load facilities.

***Initiative 3: (Extreme Weather Risks) Advise WECC to Incorporate Extreme Weather and Climate-Driven Scenarios into Reliability Assessments and Long-Term Planning Processes***

Extreme weather is becoming an increasingly significant driver of reliability risk for the BPS. Across the West, major reliability events have frequently occurred when extreme weather simultaneously affects generation, transmission, and demand conditions across wide geographic areas. Increasingly, electricity demand is becoming more sensitive to weather conditions. In addition to electrification trends, rising temperatures are driving greater adoption and use of air conditioning across the West—including in regions such as the Pacific Northwest where cooling demand has historically been limited. In some cases, wildfire smoke and poor air quality are further increasing indoor cooling needs, compounding peak demand during extreme heat events. As the resource mix evolves and electrification increases demand sensitivity to weather conditions, traditional planning assumptions based on historical weather patterns may underestimate the likelihood and severity of future reliability challenges.

In the Western Interconnection, climate-driven stressors are already influencing both system operations and long-term planning. Prolonged drought conditions can reduce hydroelectric generation availability, increasingly intense heat events can drive electricity demand beyond historical peak levels, and wildfire activity can disrupt transmission infrastructure and generation availability. These risks are often correlated and can occur simultaneously across multiple regions, creating compound system stress that may not be fully captured in traditional deterministic

planning scenarios.

Recent winter events across the Pacific Northwest, Alberta, and British Columbia demonstrated that reliability challenges can extend across wide geographic areas and persist for longer durations than many planning models assume. At the same time, resource adequacy assessment practices across North America are evolving to incorporate probabilistic weather modeling, multi-year weather datasets, and resilience considerations into reliability planning.

Beginning in 2026, NERC plans to incorporate extreme weather and fuel supply scenarios into its Long-Term Reliability Assessment (LTRA). At the regional level, implementation of FERC Orders 1920/1920A/1920B will require transmission providers to conduct long-term (20-year) transmission planning with meaningful state engagement. However, across the three Western transmission planning regions key planning assumptions such as load growth projections, policy drivers, and resource development trajectories remain inconsistent. These differences risk producing fragmented long-term transmission plans for what is a physically unified Western Interconnection.

Through this initiative, WIRAB will encourage WECC to incorporate extreme weather and climate-driven scenarios into regional reliability assessments and to promote greater consistency in how these risks are reflected in long-term transmission planning models and data sets. This includes ensuring that Western-specific climate scenarios, such as extreme heat coinciding with reduced hydro availability or wildfire-driven transmission outages, are considered in both reliability assessments and long-term transmission planning frameworks. WECC's datasets and models serve as the basis for ongoing long-term transmission assessments across the region and will likely be vital to Order 1920 implementation.

The goals of this initiative include:

- Encouraging WECC to develop Western-specific climate scenarios for use in reliability assessments and planning studies.
- Advising WECC to incorporate changing demand characteristics, including increased weather sensitivity of load due to air conditioning adoption, electrification, and behavioral responses to extreme weather and air quality, into reliability assessments and scenario development.

- Promoting integration of multi-stressor scenario analysis that captures both supply-side constraints (e.g., low hydro, wildfire-related outages) and demand-side impacts (e.g., extreme heat and electrification-driven peak shifts) into the Western Assessment of Resource Adequacy (WARA), and long-term reliability assessments.
- Supporting improved consistency in long-term planning assumptions across planning regions, particularly regarding load growth, resource mix, and climate-driven reliability risks.
- Encouraging meaningful engagement from state and provincial policymakers in reliability assessments to ensure state and provincial considerations and policy goals are reflected in long-term assessments.
- Providing policymakers with reliability insights that reflect the compound climate risks and long-term infrastructure needs facing the Western Interconnection.

To achieve these goals, WIRAB staff will:

- Engage with WECC technical committees and stakeholder processes addressing extreme weather risks and long-term reliability planning.
- Review how evolving load shapes and increasing weather sensitivity are incorporated into WECC reliability assessments and planning scenarios.
- Encourage collaboration between WECC, transmission planners, states, and regional organizations to develop realistic Western-specific climate scenarios for planning and reliability analysis.
- Monitor the implementation of transmission planning processes across the West and to help ensure that information is available to WECC for incorporation into reliability planning.
- Communicate emerging reliability risks and planning considerations to WIRAB members and support dialogue on potential policy and planning responses.

Through this initiative, WIRAB will help ensure that reliability assessments and long-term planning processes in the Western Interconnection account for evolving climate conditions, extreme weather risks, and the need for coordinated regional planning.

***Initiative 4: (Large Load Flexibility) Advise WECC and States to Close the Reliability Gap on Large Load Emergency Operations and Demand Response in the Western Interconnection***

The rapid integration of large loads into the Western Interconnection has created significant gaps in operational readiness. Data centers and other computational load entities may exhibit rapid, uncoordinated load reductions that can materially affect bulk power system stability. At the same time, these loads represent a substantial and largely untapped source of demand flexibility that, if properly coordinated, could support grid reliability during emergencies. Developing the operational protocols, communication requirements, and emergency curtailment obligations that would allow balancing authorities and reliability coordinators to manage their behavior during declared system emergencies is an urgent reliability priority for the Western Interconnection.

NERC's incident analysis has documented the scale of these risks. As example, in a July 2024 disturbance in a high-concentration data center area, a routine transmission fault caused approximately 1,500 MW of large load to drop simultaneously. System operators did not anticipate the load loss and had no protocols to manage the disturbance. NERC has responded to the reliability risks posed by large loads with escalating action, progressing from informational guidance to mandatory directives as the implications for bulk power system operations have become clearer, and WECC's Large Load Risk Assessment has similarly warned that significant loss of large load can cause instability, uncontrolled separation, and cascading outages throughout the interconnection.

The operational risks posed by large loads during system emergencies remain largely unaddressed in the Western Interconnection. Western utilities, balancing authorities, and reliability coordinators currently lack consistent protocols for communicating with large load operators during disturbances, managing uncoordinated large load reductions, or directing large loads to curtail during declared emergencies. As large load development accelerates across the region, the absence of a coordinated operational framework poses a growing risk to the reliable operation of the Western Interconnection.

Through this initiative, WIRAB will encourage WECC and Western states to ensure adequate frameworks for large load emergency operations and demand response are developed to ensure reliability and that complement NERC's ongoing standards work and address the

operational reliability risks the region faces now.

The goals of this initiative include:

- Advising WECC to ensure the development of an adequate framework for large load emergency operating protocols and demand response expectations.
- Encouraging WECC to assess the potential demand response contribution of large loads in the Western Interconnection and evaluate how that flexibility can be incorporated into resource adequacy and emergency planning.
- Ensuring Western state regulators, utilities, and balancing authorities are equipped to establish clear reliability expectations for large load customers in interconnection and operating agreements.
- Promoting consistency in how Western utilities and balancing authorities communicate with and manage large loads during declared emergency conditions.
- Identifying whether existing NERC reliability standards, including emergency operations standards, adequately address large load behavior during system disturbances.

To achieve these goals, WIRAB staff will:

- Monitor NERC's actions on large load interconnections and identify areas where Western-specific guidance may be warranted.
- Engage with WECC's technical committees to promote the development of emergency operating protocols for large loads.
- Encourage WECC to convene utilities, balancing authorities, reliability coordinators, and large load operators to develop coordinated approaches to large load demand response and emergency curtailment.
- Collaborate with state and provincial energy offices and utility commissions to assess whether existing state regulatory tools and interconnection agreements provide adequate mechanisms for large load emergency management.

- Host briefings and discussions to engage WIRAB members and Western regulators on large load operational risks and the demand response frameworks being developed in other jurisdictions.

Through this initiative, WIRAB will help ensure that Western utilities, balancing authorities, and regulators have the operational frameworks and regulatory tools needed to manage large load behavior during system emergencies and to capture the demand flexibility these loads can provide to support reliability in the Western Interconnection.

## 2027 Budget and Assessment Impacts

The proposed 2027 WIRAB budget totals \$882,845, an increase of \$20,365 or 2.4% over the approved 2026 budget. Staffing remains unchanged at 3.0 FTEs, supported by two dedicated WIRAB staff and five additional technical staff allocations. The total 2027 funding requirement is \$711,845, with a proposed funding assessment of \$709,845, an increase of \$3,765 or 0.5% from 2026. This modest assessment increase supports continued assessment stabilization while incrementally drawing down reserves to 25% of budgeted expenses. The 2027 budget includes the use of \$171,000 in working capital reserves.

### Personnel and Indirect Expenses

Direct labor expenses increased from \$290,386 in 2026 to \$305,705, a \$15,319 or 5.3% increase. This reflects a budgeted 4% cost-of-living and merit adjustment and various labor allocation changes. WIRAB applies a single-rate methodology for indirect expenses, which include office, medical, and retirement costs, as well as holiday, vacation, and sick leave. The indirect rate declined from 96.8% to 93.6% of direct labor costs. Table 2 summarizes personnel and indirect expenses per FTE for the approved 2026 budget and the proposed 2027 budget.

Table 2. Personnel and Indirect Expense Analysis, 2026 - 2027

| WIRAB - Personnel and Indirect Expense Analysis 2027 |                |                    |                |              |             |
|------------------------------------------------------|----------------|--------------------|----------------|--------------|-------------|
| STATUTORY                                            |                |                    |                |              |             |
|                                                      | Budget<br>2026 | Projection<br>2026 | Budget<br>2027 | Change<br>\$ | Change<br>% |
| <b>Personnel</b>                                     |                |                    |                |              |             |
| Direct Labor                                         | \$ 290,386     | \$ 290,386         | \$ 305,705     | \$ 15,319    | 5.3%        |
| FTEs                                                 | 3.00           | 3.00               | 3.00           | -            | 0.0%        |
| Cost per FTE                                         | \$ 96,795      | \$ 96,795          | \$ 101,902     | \$ 5,106     | 5.3%        |
| <b>Indirect</b>                                      |                |                    |                |              |             |
| Indirect Rate                                        | 96.8%          | 96.8%              | 93.6%          |              | -3.3%       |
| Indirect Expense                                     | \$ 281,094     | \$ 281,094         | \$ 286,140     | \$ 5,046     | 1.8%        |
| FTEs                                                 | 3.00           | 3.00               | 3.00           | -            | 0.0%        |
| Cost per FTE                                         | \$ 93,698      | \$ 93,698          | \$ 95,380      | \$ 1,682     | 1.8%        |

### Meeting Expense

Meeting expenses remain flat at \$110,500 in the 2027 budget and support two major in-person meetings annually involving state and provincial agencies with electric power responsibilities in the Western Interconnection. Where feasible, WIRAB meetings will be coordinated with other Western regional meetings. Webinars and monthly conference calls will continue to be used to address emerging issues, provide member updates, and develop positions on Western Interconnection reliability matters.

### Travel Expense

Travel expenses remain unchanged at \$80,500. Member travel to biannual meetings and reliability conferences totals \$42,400, while staff travel to WIRAB, WECC, NERC, FERC, and related meetings accounts for \$38,100. Travel and lodging costs are based on historical experience and current economic conditions.

### Consultants and Contracts

Contracted technical support remains budgeted at \$100,000 for 2027, consistent with the approved 2026 budget. These funds support specialized expertise related to grid operating practices, reliability standards, and compliance, enabling WIRAB to provide technically sound advice to FERC, NERC, and WECC under Section 215(j).

Table 3. Budget Comparison 2026-2027

| WIRAB - Statement of Activities and Change in Working Capital<br>2026 Budget & Projection, and 2027 Budget |                     |                     |                |             |                     |                          |             |
|------------------------------------------------------------------------------------------------------------|---------------------|---------------------|----------------|-------------|---------------------|--------------------------|-------------|
| STATUTORY                                                                                                  |                     |                     |                |             |                     |                          |             |
|                                                                                                            | 2026<br>Budget      | 2026<br>Projection  | 2026<br>Change | % Change    | 2027<br>Budget      | 2027<br>v 2026<br>Change | % Change    |
| <b>Funding</b>                                                                                             |                     |                     |                |             |                     |                          |             |
| <b>WIRAB Funding</b>                                                                                       |                     |                     |                |             |                     |                          |             |
| Assessments                                                                                                | \$ 706,080          | \$ 706,080          | \$ -           | 0.0%        | \$ 709,845          | \$ 3,765                 | 0.5%        |
| Penalty Sanctions                                                                                          | -                   | -                   | -              | -           | -                   | -                        | -           |
| <b>Total WIRAB Funding</b>                                                                                 | <b>\$ 706,080</b>   | <b>\$ 706,080</b>   | <b>\$ -</b>    | <b>0.0%</b> | <b>\$ 709,845</b>   | <b>\$ 3,765</b>          | <b>0.5%</b> |
| Membership Dues                                                                                            | -                   | -                   | -              | -           | -                   | -                        | -           |
| Interest                                                                                                   | 2,000               | 2,000               | \$ -           | 0.0%        | 2,000               | \$ -                     | 0.0%        |
| Miscellaneous                                                                                              | -                   | -                   | -              | -           | -                   | -                        | -           |
| <b>Total Funding (A)</b>                                                                                   | <b>\$ 708,080</b>   | <b>\$ 708,080</b>   | <b>\$ -</b>    | <b>0.0%</b> | <b>\$ 711,845</b>   | <b>\$ 3,765</b>          | <b>0.5%</b> |
| <b>Expenses</b>                                                                                            |                     |                     |                |             |                     |                          |             |
| <b>Personnel Expenses</b>                                                                                  |                     |                     |                |             |                     |                          |             |
| Direct Labor                                                                                               | 290,386             | 290,386             | -              | 0.0%        | 305,705             | \$ 15,319                | 5.3%        |
| Payroll Taxes                                                                                              |                     |                     | -              | -           |                     | -                        | -           |
| Benefits                                                                                                   |                     |                     | -              | -           |                     | -                        | -           |
| Retirement Costs                                                                                           |                     |                     | -              | -           |                     | -                        | -           |
| <b>Total Personnel Expenses</b>                                                                            | <b>\$ 290,386</b>   | <b>\$ 290,386</b>   | <b>\$ -</b>    | <b>0.0%</b> | <b>\$ 305,705</b>   | <b>\$ 15,319</b>         | <b>5.3%</b> |
| <b>Meeting Expenses</b>                                                                                    |                     |                     |                |             |                     |                          |             |
| WIRAB Meetings                                                                                             | \$ 110,500          | \$ 110,500          | \$ -           | 0.0%        | \$ 110,500          | \$ -                     | 0.0%        |
| State Travel                                                                                               | 42,400              | 42,400              | \$ -           | 0.0%        | 42,400              | \$ -                     | 0.0%        |
| Staff Travel                                                                                               | 38,100              | 38,100              | \$ -           | 0.0%        | 38,100              | \$ -                     | 0.0%        |
|                                                                                                            |                     |                     | \$ -           | -           |                     | \$ -                     | -           |
| <b>Total Meeting Expenses</b>                                                                              | <b>\$ 191,000</b>   | <b>\$ 191,000</b>   | <b>\$ -</b>    | <b>0.0%</b> | <b>\$ 191,000</b>   | <b>\$ -</b>              | <b>0.0%</b> |
| <b>Operating Expenses</b>                                                                                  |                     |                     |                |             |                     |                          |             |
| Consultants & Contracts                                                                                    | \$ 100,000          | \$ 100,000          | \$ -           | 0.0%        | \$ 100,000          | \$ -                     | 0.0%        |
| Office Rent                                                                                                | -                   | -                   | -              | -           | -                   | -                        | -           |
| Office Costs                                                                                               | -                   | -                   | -              | -           | -                   | -                        | -           |
| Professional Services                                                                                      | -                   | -                   | -              | -           | -                   | -                        | -           |
| Miscellaneous                                                                                              | -                   | -                   | -              | -           | -                   | -                        | -           |
| Depreciation                                                                                               | -                   | -                   | -              | -           | -                   | -                        | -           |
| <b>Total Operating Expenses</b>                                                                            | <b>\$ 100,000</b>   | <b>\$ 100,000</b>   | <b>\$ -</b>    | <b>0.0%</b> | <b>\$ 100,000</b>   | <b>\$ -</b>              | <b>0.0%</b> |
| <b>Total Direct Expenses</b>                                                                               | <b>\$ 581,386</b>   | <b>\$ 581,386</b>   | <b>\$ -</b>    | <b>0.0%</b> | <b>\$ 596,705</b>   | <b>\$ 15,319</b>         | <b>2.6%</b> |
| <b>Indirect Expenses</b>                                                                                   | <b>\$ 281,094</b>   | <b>\$ 281,094</b>   | <b>\$ -</b>    | <b>0.0%</b> | <b>\$ 286,140</b>   | <b>\$ 5,046</b>          | <b>1.8%</b> |
| <b>Other Non-Operating Expenses</b>                                                                        | <b>\$ -</b>         | <b>\$ -</b>         | <b>\$ -</b>    | <b>-</b>    | <b>\$ -</b>         | <b>\$ -</b>              | <b>-</b>    |
| <b>TOTAL BUDGET (B)</b>                                                                                    | <b>\$ 862,480</b>   | <b>\$ 862,480</b>   | <b>\$ -</b>    | <b>0.0%</b> | <b>\$ 882,845</b>   | <b>\$ 20,365</b>         | <b>2.4%</b> |
| <b>CHANGE IN WORKING CAPITAL (=A-B)<sup>1</sup></b>                                                        | <b>\$ (154,400)</b> | <b>\$ (154,400)</b> | <b>\$ -</b>    | <b>-</b>    | <b>\$ (171,000)</b> | <b>\$ (16,600)</b>       | <b>-</b>    |
| <b>FTEs</b>                                                                                                | 3.00                | 3.00                | -              | 0.0%        | 3.00                | -                        | 0.0%        |

## Statutory Assessments

WIRAB's proposed funding assessment of \$709,845 is allocated at \$603,165 or 85% to the U.S. portion; and \$106,680 or 15% to the Canadian portion, based on 2025 NEL data received and updated on August 4, 2026.

## Key Assumptions

The WIRAB 2027 Business Plan and Budget is based on the following assumptions:

- There will be no significant expansion of the FERC responsibilities as a result of legislation or administrative actions.
- There is a continued minor expansion of NERC and WECC responsibilities due to FERC Order 901 requiring NERC to develop new or modify reliability standards to address inverter-based resources.
- There is a minor expansion of NERC and WECC activities related to large loads including potential registration and reliability standards for certain large computational load entities.
- WIRAB will monitor reliability coordination activities at the RC West, SPP, the AESO, and BC Hydro.
- WIRAB will monitor resource adequacy and transmission planning activities at the Western Power Pool and within the Western Interconnection.
- WIRAB will hold two in-person meetings in 2027.
- WIRAB will organize and sponsor webinars and workshops on key reliability issues for WIRAB members, state and provincial representatives, industry representatives, and other interested stakeholders.
- WIRAB will attend all WECC Board of Directors and Member Advisory Committee (MAC) meetings.
- WIRAB will monitor all NERC Board of Trustees meetings and attend select NERC meetings and workshops.
- WIRAB will annually visit FERC in its offices.
- WIRAB will monitor all FERC business meetings.
- WIRAB will attend FERC technical conferences on reliability issues.

## Section A – Statutory Activities

### 2027 Business Plan and Budget

WIRAB's advice to the FERC, NERC, and WECC can be grouped into four categories that are appropriately funded under Section 215 of the FPA:

1. **Governance and Strategic Planning:** Section 215(j) of the FPA authorizes WIRAB to provide advice to the FERC on the governance, strategic direction, budget, and fees of WECC.
2. **Emerging Trends and System Risks:** WIRAB must maintain awareness of system conditions, emerging trends, and system risks in order to provide effective and technically sound advice regarding the strategic direction of the FERC, NERC, and WECC. WIRAB also uses knowledge of emerging trends and risks to provide advice to WECC on reliability readiness activities and proactive compliance efforts. These activities are appropriately funded under Section 215(j) of the FPA.
3. **Periodic Reliability Assessments:** Section 215(g) of the FPA requires NERC to conduct periodic assessments of the reliability and adequacy of the BPS. WECC assists NERC in performing this statutory activity. WIRAB works closely with WECC to improve reliability and resource adequacy assessments in the Western Interconnection.
4. **Reliability Standards and Proactive Enforcement:** Section 215(j) of the FPA authorizes WIRAB to provide advice to the FERC on whether reliability standards are just, reasonable, not unduly discriminatory, or preferential, and in the public interest. WIRAB works closely with WECC to identify emerging problems or conditions that should be considered in the course of requesting, drafting, and voting on amendments to existing standards and in developing new standards.

WIRAB's activities in each of these categories are described in the following subsections.

## **Governance and Strategic Planning**

Section 215(j) of the FPA authorizes WIRAB to advise the FERC, NERC, and the regional entity (i.e., WECC) on the governance, strategic direction, budget, and fees of WECC. To inform WIRAB on governance matters, WIRAB staff engages with the WECC Board of Directors, management, Technical Committees, and Member Advisory Committee (MAC). Through this engagement, WIRAB monitors developments related to WECC's organizational governance, strategic direction, and business plan and budget. This engagement informs WIRAB's efforts to evaluate the effectiveness and efficiency of operations at WECC and to ensure that all "activities conducted pursuant to Section 215 are just, reasonable, not unduly discriminatory or preferential, and in the public interest."

WIRAB staff also conduct open monthly meetings with WIRAB Members. During these teleconference meetings, WIRAB staff provides WIRAB Members, WECC's Class 5 Representatives (i.e., representatives of state and provincial governments), and other interested stakeholders with regular updates on current and upcoming activities at WECC, NERC, and other reliability topics in the Western Interconnection. These meetings provide WIRAB Members with an opportunity to develop and review WIRAB's written Advice. During these webinars, WIRAB staff also provide opportunities for WECC staff to engage with and discuss governance-related activities with WIRAB Members. WIRAB provides WECC with Advice with a single common voice from the states and provinces on operational practices and performance, annual business plans and budgets, strategic planning, committee charters, proposed bylaw amendments, fees, and other matters.

WIRAB also advises on organizational reviews of WECC and monitors and participates in the implementation of the recommendations that the WECC Board develops during these organizational reviews. WIRAB and WIRAB staff will continue to engage with WECC and to provide Advice and guidance to the organization as appropriate.

## **Emerging Trends and System Risks**

WIRAB staff engages in the following ongoing activities in order to provide independent expert advice on emerging reliability trends and system risks:

***Event Analysis and Situational Awareness:***

Understanding important operational issues facing the bulk power system (BPS) today, as well as in the past, is key to maintaining and improving reliability in the Western Interconnection. Event analysis and situational awareness matters should be discussed in open and transparent forums, when appropriate. These types of discussions bring together utility operators, who deal with these types of issues on a day-to-day basis, with thought leaders to provide different perspectives that can add value to tackling reliability challenges. It is important to share lessons learned and to promote best practices to ensure that system operators have access to the tools and knowledge necessary to maintain a reliable grid in real-time.

WIRAB members and the WIRAB staff engage in relevant discussions and activities by attending and participating in WECC and NERC technical committee meetings, monitoring the western Reliability Coordinators, and monitoring reliability activities in other forums. WIRAB staff also provides leadership by conducting educational webinars and develops panel sessions for WIRAB's in-person meetings. These outreach opportunities are designed to promote discussions among Western regulators, policymakers, and other stakeholders regarding emerging trends and risks associated with system events.

***Expanding Market Operations:***

Organized markets continue to expand in the Western Interconnection. The California Independent System Operator (CAISO) Western Energy Imbalance Market (WEIM) continues to gain new participants, and CAISO will soon offer day-ahead market services to WEIM participants through their Extended Day-Ahead Market (EDAM). The Southwest Power Pool (SPP) also offering market services Balancing Authorities (BAs) and Transmission Operators (TOPs) within the Western Interconnection with services through its day ahead market: Market+. Some western utilities have joined SPP's full RTO with expansion into the Western Interconnection. Additionally, the West-Wide Governance Pathways Initiative is moving forward to create the Regional Organization for Western Energy (ROWE) to provide independent governance to EDAM and WEIM. These market reforms could result in significant changes to system operations (e.g., transmission scheduling, congestion management, etc.) and create new reliability challenges and opportunities for the Western Interconnection. The Western Power Pool's Western Resource Adequacy Program (WRAP) is in a non-binding period, and when it moves to fully binding

operations it will allow Western participants to coordinate resource adequacy requirements necessary to maintain reliability. Additionally, market participants are exploring new resource adequacy constructs to support market operations.

WIRAB staff monitors market reform efforts in the Western Interconnection and provides a forum for discussions about reliability-related issues associated with developing multiple markets in the Western Interconnection. WIRAB staff monitors and participates in forums that are exploring these reliability issues associated with markets taking place at public utility commissions, regional TOP meetings, and ISO/RTO workshops. Additionally, WIRAB staff engages in relevant WECC technical committee meetings and activities, such as those of WECC's Reliability Risk Committee. WIRAB will continue to provide advice to WECC and to make recommendations as appropriate on reliability challenges and opportunities associated with expanding market operations in the Western Interconnection.

### ***Essential Reliability Services:***

As the resource mix continues to change, some reliability services that have traditionally been provided by synchronous generating resources may not be available to the same extent in the future as the BPS is becoming increasingly reliant on variable inverter-based resources. The electric utility industry must examine alternative opportunities to provide these essential reliability services and develop practices today that support ongoing BPS reliability under a new paradigm. Inverter-based resources, specifically solar PV generation, have historically been regarded as unable to provide grid supporting services, such as frequency support and voltage control, traditionally provided by synchronous resources. However, new power electronic technologies available through advanced inverters and other grid-enhancing technologies now enable inverter-based generation to provide grid support similar to synchronous generators if programmed correctly. FERC Order 901, which requires NERC to develop new or modify reliability standards to address inverter-based resources, will address some reliability gaps related to inverter-based resources in data sharing, model validation, planning and operational studies, and performance and ride-through requirements. The West has been at the forefront of the inverter-based resource issue and there may continue to be a need for additional policies and practices to account for emerging technologies to support grid reliability in the future in the Western Interconnection.

WIRAB Members and WIRAB staff develop expertise by attending, participating in, and

monitoring WECC's Technical Committees, NERC's Reliability Issues Steering Committee (RISC), Reliability and Security Technical Committee (RSTC), the FERC's Reliability Technical Conferences, and other forums within the industry such as the Energy Systems Integration Group (ESIG). WIRAB provides advice on policies regarding the risks associated with the provision of essential reliability services in the Western Interconnection. Additionally, WIRAB leverages subject matter expertise via consultant projects to educate and inform WIRAB Advice. WIRAB staff also provide periodic outreach webinars and develop panel sessions for WIRAB's in-person meetings to discuss emerging trends. These forums provide an opportunity to inform Western policymakers and other interested stakeholders of the emerging risks associated with the changing resource mix and the importance of maintaining essential reliability services in the Western Interconnection.

### ***Load Growth and Large Loads:***

The Western Interconnection is experiencing a surge in electricity demand driven by electrification efforts and the rapid emergence of large loads, such as advanced manufacturing facilities and data centers. These loads often require hundreds of megawatts of new demand, may be clustered in locations with limited transmission capacity, and can be deployed much faster than utility infrastructure can be upgraded. This imbalance presents significant reliability planning and operational challenges.

WIRAB monitors the potential system risks from this unprecedented load growth by engaging with regulators, utilities, WECC and NERC technical committees, and other industry forums. WIRAB staff also participates in discussions around transmission and distribution system impacts, utility interconnection processes, and the adequacy of planning models and assumptions to address fast-evolving load scenarios. WIRAB advises WECC to work with industry stakeholders to evaluate accelerated load scenarios and large load impacts on the reliability of the Western Interconnection.

### **Periodic Reliability Assessments**

Assessing the reliability implications of a changing resource mix is a high priority for WIRAB. WIRAB strives for WECC to produce high-quality assessments that address the reliability implications of the changing resource mix in the Western Interconnection over a 10- to 20-year timeframe to inform policymaking in the West. Production cost modeling can identify the

economic dispatch of a potential new resource mix for every hour over a future year and identify critical hours of system stress. Power flow analysis then examines these critical stress hours for traditional reliability parameters. The integrated use of production cost modeling and power flow analysis will be essential for future reliability assessments of the Western Interconnection.

Additionally, the Western Power Pool (WPP), through its Western Transmission Expansion Coalition (WestTEC) initiative, is completing a collaborative, West-wide effort aimed at formulating an actionable transmission plan to cater to the future energy grid's requirements. A West-wide transmission plan will have significant reliability implications that require adherence to the principles of transparency, independence, and inclusivity, with consideration for interconnection-wide transmission planning perspectives. WECC has contributed both time and money to support this effort.

WIRAB will monitor the WestTEC initiative and advise WECC on its participation in the effort and next steps. Additionally, WIRAB monitors, advises, and participates in WECC's RAC to promote improved reliability assessments of the Western Interconnection. WIRAB will encourage and support the RAC in its efforts to integrate WECC's data and modeling capability to perform roundtrip reliability assessments that combine power flow analysis and production cost modeling. WIRAB will also monitor, engage, and communicate findings on leading research about the integration of variable energy resources into the Western Interconnection, such as the work of NERC's Inverter-Based Resource Subcommittee. WIRAB maintains a non-voting member status of the Energy Systems Integration Group (ESIG) where WIRAB staff engage in technical working groups and workshops to discuss emerging issues, which helps to inform WIRAB's advice to WECC, NERC and FERC. Further, WIRAB staff monitors and engages with national laboratories, academic and industry trade organizations such as the Institute of Electrical and Electronics Engineers (IEEE), registered entity activities, and other forums investigating the flexibility and reliability of the power system. WIRAB also provides outreach to Western states and provinces on the policy implications associated with new research.

## Reliability Standards and Proactive Enforcement

WIRAB staff engages in the following ongoing activities to provide independent expert advice on the development and proactive enforcement of reliability standards:

### *Operations and Planning Reliability Standards:*

Reliability standards were created to provide the minimum requirements for planning and operating the electric grid. The compliance and enforcement of these reliability standards ensure there is oversight and accountability of BPS owners and operators to maintain system-wide reliability. Reliability standards must be strict enough to guarantee that system reliability is maintained, but flexible enough to respond to the changing industry. It is essential to develop and review reliability standards to ensure they effectively preserve reliability while not being overly burdensome on the entities required to comply.

WIRAB staff develop WIRAB advice on the development and proactive enforcement of reliability standards by contracting with subject matter experts with direct knowledge of the efficacy of reliability standards and the burden of compliance on regulated entities. WIRAB staff attends, participates, or monitors WECC's Technical Committee meetings, WECC's Standards Committee meetings, WECC's Reliability and Security Workshop, NERC's standard development process, and other industry forums. When necessary, WIRAB provides written advice to WECC, NERC, and FERC on the implementation of specific standards or regional criteria within the Western Interconnection and standards that have a significant impact on the Western Interconnection. WIRAB staff also conduct educational webinars and in-person panel discussions for WIRAB's meetings to consider emerging trends that may require changes to reliability standards in the Western Interconnection.

### *Physical and Cyber Security:*

The electric grid's physical and cyber security continues to represent issues of growing concern in the Western Interconnection and across the ERO. The Western Interconnection has experienced physical and cyber incidents that have potentially impacted system reliability. Experiences worldwide demonstrate there are targeted threats to the electric grid reliability related to physical and cyber security. The Critical Infrastructure Protection (CIP) standards provide a baseline level set of requirements for registered entities to maintain the protection of critical assets

of the BPS. The CIP standards must be risk-based to ensure that critical assets are protected while maintaining the flexibility to respond to the changing nature of potential threats. It is essential to develop and review the CIP standards to effectively preserve reliability while not being overly burdensome on the entities required to comply.

WIRAB stays abreast of significant incidents that have compromised both the physical and cyber security of the grid through secure briefings and updates from security experts. WIRAB works with WECC and subject matter experts to educate regulators on the steps registered entities take to maintain the physical and cyber security of the grid. WIRAB continues to monitor the development of NERC's CIP standards and will provide advice when appropriate. WIRAB staff observes NERC's GridEx exercises, which allow utilities to demonstrate how they would respond to coordinated cyber and physical security events. WIRAB encourages entities to broadly share lessons learned and best practices across the Western Interconnection.

## Section B – Supplementary Financial Information

### 2027 Business Plan and Budget

#### Working Capital Reserve

WIRAB projects a working capital reserve of \$656,600 as of December 31, 2026, compared to a projected reserve of \$485,600 as of December 31, 2027, representing 55% of budgeted expenses, a slight decrease from 60% in 2026. While WIRAB's long-term target reserve level is 25% of budgeted expenses, reserves are projected to be drawn down incrementally to reach this target by 2029. To support assessment stabilization and avoid significant fluctuations across budget cycles, a higher reserve level is maintained in 2027 to facilitate a gradual and consistent drawdown. The excess working capital reserve results in a \$171,000 reduction in WIRAB's 2027 funding requirement.

In its 2018 Business Plan and Budget, WIRAB changed its reserve policy to stabilize statutory assessments while reducing its surplus financial reserve over several budget cycles. FERC allows WIRAB to carry a financial reserve under the proviso that any excess reserves be used to offset future assessments. WIRAB's funding assessments are calculated nine months in advance of each budget year. This assessment is fixed, meaning that, once approved, it cannot be decreased or increased mid-year to match actual expenses more closely. The financial reserve allows for some budgetary flexibility.

Table B-1. Working Capital Reserve Analysis 2026 - 2027

| WIRAB - Working Capital Reserve Analysis 2025 - 2027                                |                  |
|-------------------------------------------------------------------------------------|------------------|
| STATUTORY                                                                           |                  |
| <b>Beginning Working Capital Reserve (Deficit), December 31, 2025</b>               | 810,981          |
| Plus: 2026 Funding (from LSEs or designees)                                         | 706,080          |
| Plus: 2026 Other funding sources                                                    | 2,000            |
| Minus: 2026 Projected expenses & capital expenditures                               | (862,480)        |
| <b>Projected Working Capital Reserve (Deficit), December 31, 2026</b>               | <b>656,600</b>   |
| <b>Desired Working Capital Reserve, December 31, 2027</b>                           | 485,600          |
| Minus: Projected Working Capital Reserve, December 31, 2026                         | (656,600)        |
| <b>Increase(decrease) in funding requirement to achieve Working Capital Reserve</b> | <b>(171,000)</b> |
| 2027 Expenses and Capital Expenditures                                              | 882,845          |
| Less: Penalty Sanctions                                                             | 0                |
| Less: Other Funding Sources                                                         | (2,000)          |
| Adjustment: To achieve desired Working Capital Reserve                              | (171,000)        |
| <b>2027 NERC Assessment</b>                                                         | <b>709,845</b>   |

Table B-2. 2026 Approved Budget with 2027 – 2029 Projections

WIRAB projects a 2.4% increase in its annual budget for 2027, followed by 2.7% increases in both 2028 and 2029. These modest increases reflect standard cost-of-living and merit adjustments, while all other direct costs are assumed to remain flat.

| WIRAB - 2026 Budget and 2027 - 2030 Projections     |                     |                     |                                                                    |  |                     |                                                                    |  |                    |                                                                    |  |
|-----------------------------------------------------|---------------------|---------------------|--------------------------------------------------------------------|--|---------------------|--------------------------------------------------------------------|--|--------------------|--------------------------------------------------------------------|--|
| STATUTORY                                           |                     |                     |                                                                    |  |                     |                                                                    |  |                    |                                                                    |  |
|                                                     | 2026<br>Budget      | 2027<br>Projection  | Change<br>2027 Projection<br>v 2026 Budget<br>Over(Under) % Change |  | 2028<br>Projection  | Change<br>2028 Projection<br>v 2027 Budget<br>Over(Under) % Change |  | 2029<br>Projection | Change<br>2029 Projection<br>v 2028 Budget<br>Over(Under) % Change |  |
| <b>Funding</b>                                      |                     |                     |                                                                    |  |                     |                                                                    |  |                    |                                                                    |  |
| <b>WIRAB Funding</b>                                |                     |                     |                                                                    |  |                     |                                                                    |  |                    |                                                                    |  |
| Assessments                                         | \$ 706,080          | \$ 709,845          | \$ 3,765 0.5%                                                      |  | \$ 736,200          | \$ 26,355 3.7%                                                     |  | \$ 844,500         | \$ 108,300 14.7%                                                   |  |
| Penalty Sanctions                                   | -                   | -                   | -                                                                  |  | -                   | -                                                                  |  | -                  | -                                                                  |  |
| <b>Total WIRAB Funding</b>                          | <b>\$ 706,080</b>   | <b>\$ 709,845</b>   | <b>\$ 3,765 0.5%</b>                                               |  | <b>\$ 736,200</b>   | <b>\$ 26,355 3.7%</b>                                              |  | <b>\$ 844,500</b>  | <b>\$ 108,300 14.7%</b>                                            |  |
| Membership Dues                                     | -                   | -                   | -                                                                  |  | -                   | -                                                                  |  | -                  | -                                                                  |  |
| Testing Fees                                        | -                   | -                   | -                                                                  |  | -                   | -                                                                  |  | -                  | -                                                                  |  |
| Services & Software                                 | -                   | -                   | -                                                                  |  | -                   | -                                                                  |  | -                  | -                                                                  |  |
| Workshops                                           | -                   | -                   | -                                                                  |  | -                   | -                                                                  |  | -                  | -                                                                  |  |
| Interest                                            | 2,000               | 2,000               | \$ - 0.0%                                                          |  | 2,000               | \$ - 0.0%                                                          |  | 2,000              | \$ - 0.0%                                                          |  |
| Miscellaneous                                       | -                   | -                   | -                                                                  |  | -                   | -                                                                  |  | -                  | -                                                                  |  |
| <b>Total Funding (A)</b>                            | <b>\$ 708,080</b>   | <b>\$ 711,845</b>   | <b>\$ 3,765 0.5%</b>                                               |  | <b>\$ 738,200</b>   | <b>\$ 26,355 3.7%</b>                                              |  | <b>\$ 846,500</b>  | <b>\$ 108,300 14.7%</b>                                            |  |
| <b>Expenses</b>                                     |                     |                     |                                                                    |  |                     |                                                                    |  |                    |                                                                    |  |
| <b>Personnel Expenses</b>                           |                     |                     |                                                                    |  |                     |                                                                    |  |                    |                                                                    |  |
| Direct Labor                                        | 290,386             | 305,705             | 15,319 5.3%                                                        |  | 317,900             | \$ 12,195 4.0%                                                     |  | 330,600            | \$ 12,700 4.0%                                                     |  |
| Payroll Taxes                                       | -                   | -                   | -                                                                  |  | -                   | -                                                                  |  | -                  | -                                                                  |  |
| Benefits                                            | -                   | -                   | -                                                                  |  | -                   | -                                                                  |  | -                  | -                                                                  |  |
| Retirement Costs                                    | -                   | -                   | -                                                                  |  | -                   | -                                                                  |  | -                  | -                                                                  |  |
| <b>Total Personnel Expenses</b>                     | <b>\$ 290,386</b>   | <b>\$ 305,705</b>   | <b>\$ 15,319 5.3%</b>                                              |  | <b>\$ 317,900</b>   | <b>\$ 12,195 4.0%</b>                                              |  | <b>\$ 330,600</b>  | <b>\$ 12,700 4.0%</b>                                              |  |
| <b>Meeting Expenses</b>                             |                     |                     |                                                                    |  |                     |                                                                    |  |                    |                                                                    |  |
| WIRAB Meetings                                      | \$ 110,500          | \$ 110,500          | \$ - 0.0%                                                          |  | \$ 110,500          | \$ - 0.0%                                                          |  | \$ 110,500         | \$ - 0.0%                                                          |  |
| State Travel                                        | \$ 42,400           | \$ 42,400           | \$ - 0.0%                                                          |  | \$ 42,400           | \$ - 0.0%                                                          |  | \$ 42,400          | \$ - 0.0%                                                          |  |
| Staff Travel                                        | \$ 38,100           | \$ 38,100           | \$ - 0.0%                                                          |  | \$ 38,100           | \$ - 0.0%                                                          |  | \$ 38,100          | \$ - 0.0%                                                          |  |
| <b>Total Meeting Expenses</b>                       | <b>\$ 191,000</b>   | <b>\$ 191,000</b>   | <b>\$ - 0.0%</b>                                                   |  | <b>\$ 191,000</b>   | <b>\$ - 0.0%</b>                                                   |  | <b>\$ 191,000</b>  | <b>\$ - 0.0%</b>                                                   |  |
| <b>Operating Expenses</b>                           |                     |                     |                                                                    |  |                     |                                                                    |  |                    |                                                                    |  |
| Consultants & Contracts                             | \$ 100,000          | \$ 100,000          | \$ - 0.0%                                                          |  | \$ 100,000          | \$ - 0.0%                                                          |  | \$ 100,000         | \$ - 0.0%                                                          |  |
| Office Rent                                         | -                   | -                   | -                                                                  |  | -                   | -                                                                  |  | -                  | -                                                                  |  |
| Office Costs                                        | -                   | -                   | -                                                                  |  | -                   | -                                                                  |  | -                  | -                                                                  |  |
| Professional Services                               | -                   | -                   | -                                                                  |  | -                   | -                                                                  |  | -                  | -                                                                  |  |
| Miscellaneous                                       | -                   | -                   | -                                                                  |  | -                   | -                                                                  |  | -                  | -                                                                  |  |
| Depreciation                                        | -                   | -                   | -                                                                  |  | -                   | -                                                                  |  | -                  | -                                                                  |  |
| <b>Total Operating Expenses</b>                     | <b>\$ 100,000</b>   | <b>\$ 100,000</b>   | <b>\$ - 0.0%</b>                                                   |  | <b>\$ 100,000</b>   | <b>\$ - 0.0%</b>                                                   |  | <b>\$ 100,000</b>  | <b>\$ - 0.0%</b>                                                   |  |
| <b>Total Direct Expenses</b>                        | <b>\$ 581,386</b>   | <b>\$ 596,705</b>   | <b>\$ 15,319 2.6%</b>                                              |  | <b>\$ 608,900</b>   | <b>\$ 12,195 2.0%</b>                                              |  | <b>\$ 621,600</b>  | <b>\$ 12,700 2.1%</b>                                              |  |
| <b>Indirect Expenses</b>                            | <b>\$ 281,094</b>   | <b>\$ 286,140</b>   | <b>\$ 5,046 1.8%</b>                                               |  | <b>\$ 297,600</b>   | <b>\$ 11,460 4.0%</b>                                              |  | <b>\$ 309,400</b>  | <b>\$ 11,800 4.0%</b>                                              |  |
| <b>Other Non-Operating Expenses</b>                 | <b>\$ -</b>         | <b>\$ -</b>         | <b>\$ - -</b>                                                      |  | <b>\$ -</b>         | <b>\$ - -</b>                                                      |  | <b>\$ -</b>        | <b>\$ - -</b>                                                      |  |
| <b>TOTAL BUDGET (B)</b>                             | <b>\$ 862,480</b>   | <b>\$ 882,845</b>   | <b>\$ 20,365 2.4%</b>                                              |  | <b>\$ 906,500</b>   | <b>\$ 23,655 2.7%</b>                                              |  | <b>\$ 931,000</b>  | <b>\$ 24,500 2.7%</b>                                              |  |
| <b>CHANGE IN WORKING CAPITAL (=A-B)<sup>1</sup></b> | <b>\$ (154,400)</b> | <b>\$ (171,000)</b> | <b>\$ (16,600) -</b>                                               |  | <b>\$ (168,300)</b> | <b>\$ 2,700 -</b>                                                  |  | <b>\$ (84,500)</b> | <b>\$ 83,800 -</b>                                                 |  |
| <b>FTEs</b>                                         | <b>3.00</b>         | <b>3.00</b>         | <b>- 0.0%</b>                                                      |  | <b>3.00</b>         | <b>- 0.0%</b>                                                      |  | <b>3.00</b>        | <b>- 0.0%</b>                                                      |  |

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## Section C – Non-Statutory Activities

### 2027 Business Plan and Budget

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WIRAB does not engage in non-statutory activities.

## Section D – Additional Consolidated Financial Statements

### 2027 Business Plan and Budget

#### Statement of Financial Position

Table D-1 provides WIRAB's Statement of Financial Position as of the following dates:

- As of June 30, 2025, per audit
- As of December 31, 2026, projected
- As of December 31, 2027, as budgeted

**Table D-1. Statement of Financial Position, Three-Year Comparison**

| WIRAB - Statement of Financial Position |                                   |                                           |                                          |  |
|-----------------------------------------|-----------------------------------|-------------------------------------------|------------------------------------------|--|
| STATUTORY                               |                                   |                                           |                                          |  |
|                                         | As of<br>June 30, 2025<br>(Audit) | As of<br>December 31, 2026<br>(Projected) | As of<br>December 31, 2027<br>(Budgeted) |  |
| <b>Assets</b>                           |                                   |                                           |                                          |  |
| Cash and Investments                    | \$ 1,039,105                      | \$ 656,600                                | \$ 485,600                               |  |
| <b>Total Assets</b>                     | <b>\$ 1,039,105</b>               | <b>\$ 656,600</b>                         | <b>\$ 485,600</b>                        |  |

## Appendix A – Organization Chart

### 2027 Business Plan and Budget

The WIRAB Staff Organization Chart is shown below.

