

To: WRAP Program Review Committee

From: Committee of State Representatives – Leadership

Date: April 21, 2026

RE: COSR Comment on 2026-NTFP-02: Edits to BPMs 105 and 202 (Operational Testing timeline & load forecasting clarification)

Dear Program Review Committee Members:

Thank you for the opportunity for the Committee of State Representatives (COSR) to review the Non-Task Force Proposal (NTFP) introduced and sponsored by the Western Power Pool (WPP). Recognizing that this proposal is limited to specific implementation provisions that directly impact WRAP Participants, the COSR will not be providing formal comments from the entire committee. However, COSR Leadership acknowledges the benefits of allowing annual Operational Tests for Qualifying resources to continue through the end of the Cure Period, which will effectively provide 60 additional days for Participants to cure any identified deficiency. This change offers more flexibility to address deficiencies ahead of the Forward Showing submittal due date, which could improve program compliance. The full COSR will be informed of the proposal and these Leadership Comments at the upcoming monthly meeting on April 24.

Similarly, we welcome continued enhancements to the Business Practice Manual (BPM) that provide more clarity, especially related to consistent Load Forecast data between the Operations Program and the Forward Showing.

We appreciate the continued efforts to refine and strengthen the program.

Respectfully,

Chris Parker

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

Brian Rybarik

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