

WRAP Status for COSR

JULY 2026

At-a-glance status updates, prepared monthly by Western Interstate Energy Board for the Committee of State Representatives (COSR)

HIGHLIGHTS / ACTION ITEMS

- On July 20, following Committee review, COSR Leadership submitted comments letters on three WRAP Proposals: [QCC for New Long Duration Storage; 2026-NTFP-04](#) (Edits to BPM 202 on MD / OD File Prioritization) and [2026-NTFP-05](#) (Clarification of FS Deficiency Charges & FS Deadline Extension Due to FS Software Failures)
- The COSR comment period is open through August 10 on [2026-NTFP-03](#) (Participant-to-Participant JCAF and Embedded Entity Resource Agreement Changes).
- The following three WRAP proposals are approaching completion with the COSR comment period expected in August or September: 1. Two-Tranche ELCC Proposal; 2. Day-Ahead Market Proposal; 3. Deficiency Charge Deferral Expedited Proposal.

PROGRAM FUNCTIONS / PROPOSAL DEVELOPMENT	STATUS
2026-NTFP-03 (Participant-to-Participant JCAF and Embedded Entity Resource Agreement Changes) Purpose: This NTFP introduces two changes to the BPM: 1.) removes the requirement for Joint Contract Accreditation Forms (JCAF) signatures between participants and 2.) allows a WRAP Participant and its customer to agree to the use of the customer's associated resources / contracts (in addition to the load) in the Participant's Forward Showing Demonstration.	WIEB will provide supporting materials, collect Committee feedback, and develop a comment letter on behalf of COSR Leadership for review (to be submitted before the comment period closes on August 10).
Task Force – Data Center & Large Loads As the first effort in the 2026-2027 PRC Workplan, this task force will examine how large loads are treated for capacity obligations (potentially excluding loads with adequate on-site generation) and review the BPM and Tariff other data availability, verification, and policy clarity.	The task force will kick off on July 28 and continue with biweekly meetings through the fall/winter. Meeting times and registration is posted on the WPP website .
Task Force – ELCC + QCC The first effort is complete; COSR Leadership submitted comments on the QCC for New Long Duration Storage proposal on July 20, 2026. The second task force effort involves the development of a new approach for capacity accreditation. This is a “two-tranche” (average and incremental) ELCC accreditation approach (depending on the amount of operational data available for the resource). A separate marginal ELCC would be performed to provide information and guidance for future resources. COSR will review and discuss the proposal during their monthly meeting in August.	This task force is nearing completion of a draft proposal for a “two-tranche” ELCC accreditation approach. The COSR previewed the proposal during the July meeting. An in-depth review of the latest draft will be provided by WIEB during the August meeting.
Task Force – Day-Ahead Market This task force was established in Summer 2025, paused in late-2025, and reconvened in May 2026 to identify and address opportunities and challenges associated with the implementation of Day-Ahead Markets in the West, including the transition of WRAP's Operations Program to SPP Markets+ (including considerations for the interim binding seasons). Key elements of the proposal include: 1. Removal of Tariff Required Credit Competitive Solicitation; 2. Southwest Subregion Holdback Allocation; 3. Energy Deployment Timeline and Logistics; 4. Energy Delivery Failures; and 5. Markets+ and WRAP Settlements Clarification.	The COSR reviewed the key points of the proposal during the July meeting. An in-depth review of the latest draft will be provided by WIEB during the August meeting.
Deficiency Charge Deferral Expedited Proposal The proposal will establish an additional Transition Period mechanism to support Participants actively developing future qualifying resources, while preserving the intent of deficiency charges and maintaining accountability for addressing capacity deficiencies. The latest draft (subject to change) will allow eligible participants that fall short of their Forward Showing Capacity Requirements to defer deficiency charges by linking the shortfall to a qualifying future resource or contracted "Deferral Resource" expected to be operational within 3 years. Deficiency charges associated with the deferred MW are accrued but not collected while the resource remains within its allowed development period, or "shot clock." If the deficiency is resolved by the new resource addition before the shot clock expires, the participant pays a reduced portion the accumulated deferred charges.	The draft is currently being discussed and finalized by the RAPC. A concurrent expedited review period (including the COSR) is expected to begin in early September. An in-depth review of the latest draft will be provided by WIEB during the August meeting.