WRAP Status for COSR

OCTOBER 2026

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

RECENT DEVELOPMENTS / NEAR-TERM COMMITTEE ACTION ITEMS

- During the October 23 monthly meeting, COSR reviewed leadership and committee comments that were submitted on the Day Ahead Market Task Force Proposal and new Cost of New Entry (CONE) Business Practice Manual (BPM). COSR also reviewed two non-task force proposals (NTFPs) for which it had previously abstained from submitting comments.
- On October 26, WPP filed with FERC (Docket No. ER27-274-000), opening a public comment window through November 16. This filing primarily concerns changes in response to the Deficiency Charge Deferral expedited proposal (2026-EP-03), for which COSR submitted comments in September.
- WIEB staff presented the COSR 2027 Business Plan & Budget. The draft budget was distributed on October 20, with comments requested by October 30. No comments were received; COSR will conduct an email vote on the proposed budget through November 6.

RECENT & FORTHCOMING PROGRAM POLICY CHANGES	STATUS
Cost of New Entry (BPM-110) Establishes a dedicated BPM for calculating and updating the CONE value used to determine Forward Showing Deficiency Charges. It defines CONE as the estimated annual cost of a hypothetical new peaking natural gas-fired generation facility in the Western Interconnection, using a standardized methodology that reflects gross resource costs without offsetting anticipated market revenues. The manual also establishes an annual review process for future updates, with an initial proposed CONE value of $131.87/kW-year.	*COSR Leadership comments: 10/21* *PRC consideration: 11/18* *RAPC consideration: 11/19* *WPP Board consideration: 12/10*
Day Ahead Market Task Force Proposal (2025-TF-04) Initially established in 2025 and reconvened in 2026, this task force was formed to evaluate the opportunities and challenges associated with the emergence of day ahead markets in the West. This includes policy during the Interim Binding Seasons (Winter 2027/28 and Summer 2028) before WPP transitions the WRAP Operations Program to SPP / Markets+. As part of this effort, the proposed changes streamline the WRAP framework by updating timelines, settlement provisions, and operational responsibilities, while removing tariff provisions that are no longer needed or are expected to be addressed through Markets+. The changes also formally designate the Southwest & East (SWEDE) footprint as a WRAP Subregion Palo Verde as the default central hub, simplifying the related administration of WRAP sharing transactions and transmission assumptions.	*COSR comments: 10/ 23* *PRC consideration: 11/18* *RAPC consideration: 11/19* *WPP Board consideration: 12/10*
Contingency Reserves (2026-NTFP-07) In September, essential near-term Tariff updates were approved by the WPP Board through an expedited proposal (2026-EP-07) and subsequently filed with FERC under Docket No. ER26-3900. This EP addressed near-term Planning Reserve Margin (PRM) modeling revisions in the WRAP needed for alignment with WPP's updated Reserve Sharing Group contingency reserve (CR) requirements. The EP and FERC filing ensured consistent modeling for all WRAP subregions. This non-task force proposal includes the related BPM updates with additional details to align with the FERC filing.	*COSR Abstained* *PRC consideration: 11/18* *RAPC consideration: 11/19* *WPP Board consideration: 12/10*
Deficiency Charge Construct with Seasonal Calculations (2026-NTFP-08) This proposal revises the WRAP Deficiency Charge framework to improve consistency and better align charges and revenue distributions with when deficiencies occur. Monthly seasonal deficiency charges would remain, but the separate Summer and Winter annual calculations would be replaced with a single annual maximum deficiency charge determined after both seasonal showings are complete. Any monthly deficiency charges already paid would be credited toward the annual assessment to avoid double charging, while seasonal attribution and CONE factors would be retained for administration and reliability purposes.	*COSR Abstained* *PRC consideration: 11/18* *RAPC consideration: 11/19* *WPP Board consideration: 12/10*
Task Force – Data Centers & Large Loads Members of the task force evaluated whether existing WRAP policies should be modified to address data centers and other large loads with behind-the-meter backup generation, including whether such loads should be excluded from WRAP load obligations or receive additional capacity value through the Customer Resource Qualifying Capacity Contribution (QCC) methodology. Following its review, the task force recommended maintaining existing policies and revisit related policies after the Winter 2027/28 Forward Showing, following operational experience in the first binding season. The task force identified a near-term change to allow participants with new, expanded, or late-registered	*In development; COSR review period expected in December* *WPP Board consideration: 12/10 (targeted)*

demand response resources to submit engineering design specifications to WPP that may allow inclusion of a higher QCC claim when WRAP testing cannot be completed in time for a given season.	
Partial Loads Expedited Proposal (2026-EP-08) This proposal establishes a flexible framework for partial load and resource participation in WRAP that can accommodate evolving market structures without tying participation rules to Markets+ requirements. Participation would be based on objective Balancing Authority Area (BAA) boundaries, requiring participants to include all load served within a participating BAA rather than selectively enrolling individual customers or load segments. The proposal also establishes corresponding resource registration, designation, and attestation requirements to ensure participating load is supported by sufficient capacity, while limiting WRAP obligations and financial responsibility to load actually enrolled in the program. The framework is intended to preserve WRAP's ability to evaluate resource adequacy where partial participation could create reliability risks and to remain adaptable to future changes in Western markets and resource adequacy programs.	*In Development; RAPC consideration: 11/12 or 11/19* *COSR consideration: late-November*
Representing Participant Expedited Proposal (2026-EP-09): Arizona Public Service (APS) introduced this proposal to add a definition for a "Representing Participant" to the Tariff to allow engagement in the WRAP from a Participant that has been authorized to represent a load responsible entity (i.e., load serving entity).	*In Development; RAPC consideration: 11/12 or 11/19* *COSR consideration: late-November*
WRAP ELCC + QCC Task Force (ELCC Methodology) Task force members provided input for the development of a proposal with two-tranche ELCC accreditation with marginal ELCC guidance for future resource. Proposal is under development.	*In development; COSR review period expected in early-2027* *WPP Board consideration: March 2027*