

WRAP Status for COSR

SEPTEMBER 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

- Western Power Pool (WPP) Board approved six expedited proposals, two task force proposals, and four non-task force proposals, as well as the conditional approval of the Rockies Subregion Planning Reserve Margins (PRM) for Summer 2027 and Winter 2027/2028. Following these approvals, WPP filed the following proposals with FERC, consolidated as [Docket No. ER26-3900](#):
 - Rockies Subregion ([2026-EP-04](#))
 - Rockies Forward Showing Deadline ([2026-EP-06](#))
 - Contingency Reserve ([2026-EP-07](#))
 - Capacity Critical Hours (CCH) by Subregion ([2026-EP-05](#))
- Eric Blank, Chair, Colorado Public Utilities Commission has officially joined the COSR.
- Freeport-McMoRan, a regulated Arizona self-supply entity, signed an agreement to join WRAP in September.

FORTHCOMING PROGRAM CHANGES & RECENT POLICY APPROVALS	STATUS
RAPC – Deficiency Charge Deferral Resolution (2026-EP-03) This proposal allows qualifying participants with unresolved Forward Showing Deficiency Charges during the Transition Period to defer a portion of those charges based on commercially reasonable procurement efforts, with the final deficiency charge ranging from 40% to 100%, depending on how quickly the participant achieves compliance in a future Forward Showing of the same season type. The proposal also includes a separate compliance schedule for the participants in the Rockies Subregion.	COSR Comments submitted on September 25 WPP will be providing a letter in response to these comments. Approved by WPP Board on September 30.
Rockies Subregion (2026-EP-04) This proposal establishes the new Rockies Subregion within WRAP by updating the Tariff and BPMs to support Rockies-specific reliability modeling, reserve margin calculations, qualifying capacity assessments, and settlement pricing, enabling more than 7,500 MW of new load to participate in the program.	COSR Abstained Endorsed by RAPC on September 28 Approved by WPP Board on September 30 and filed with FERC under Docket No. ER26-3900 .
Rockies Forward Showing Deadline (2026-EP-06) This expedited proposal is in response to FERC’s September 21 denial of WPP’s waiver request by establishing a temporary Rockies-specific Tariff and BPM timeline for the Winter 2027/28 Binding Season, preserving the standard nine-month planning window and 60-day Cure Period while enabling Rockies participants to complete the Forward Showing process.	COSR Abstained Endorsed by RAPC on September 28 Approved by WPP Board on September 30 and filed with FERC under Docket No. ER26-3900 .
Contingency Reserves (2026-EP-07) This proposal updates WRAP's contingency reserve (CR) methodology to align with the WPP Reserve Sharing Group's (RSG) new MSSC-based requirement, enabling consistent application across WRAP programs. For the WRAP, it will become effective for Summer 2028 (modeling underway) and subsequent seasons. The expected impacts of the new CR requirement are expected to reduce PRMs across the WRAP footprint. To avoid WRAP Tariff compliance concerns, WPP determined that Board approval of this proposal should occur concurrently with approval of the new Rockies Subregion PRMs, which incorporate this proposed CR methodology. As a result, 2026-NTFP-07 will remain a separate proposal for WPP Board consideration in December, while essential near-term Tariff updates were reintroduced through this expedited proposal 2026-EP-07.	COSR Abstained Endorsed by RAPC on September 28 Approved by WPP Board on September 30 and filed with FERC under Docket No. ER26-3900 .
Capacity Critical Hours (CCH) by Subregion (2026-EP-05) Modifies how WRAP identifies CCH, moving from a single set of critical hours for the entire WRAP footprint to separate CCH calculations for each WRAP subregion. The proposal recognizes that transmission constraints limit the ability of resources located in one area to serve another, so each subregion's critical hours would be based on its own load and resource conditions. It also replaces the current regional interchange adjustment with a more flexible "Additional Adjustments" framework that can account for factors such as interchange, scarcity, or other system conditions. The goal is to make resource accreditation and reliability modeling better reflect actual subregional reliability needs and transfer limitations. Any future WRAP metrics and qualifying capacity calculations would use this revised methodology.	COSR Comments submitted September 25 Endorsed by RAPC on September 28 Approved by WPP Board on September 30 and filed with FERC under Docket No. ER26-3900 .

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Cost of New Entry (CONE) (BPM 110) BPM 110 establishes a dedicated manual governing the calculation, maintenance, and annual review of the Cost of New Entry (CONE), which is used primarily 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 and applies a methodology consistent with other capacity markets, incorporating capital, financing, depreciation, and O&M costs. The manual also establishes a recurring review and update process to keep the CONE value current over time. In addition, it improves transparency by documenting the methodology, assumptions, and current CONE value in a single location.	<i>The public comment window closed on September 30. Comments were submitted by two stakeholders:</i> <i>Idaho Power Company</i> <i>Pacific Northwest Generating Cooperative</i> <i>The comment window for the COSR is expected in October or November, followed by WPP Board consideration in December.</i>
Deficiency Charge Calculation (2026-NTFP-08) Revises the WRAP Deficiency Charge framework to more clearly separate seasonal and annual deficiency charges, with the goal of eliminating outcomes that depend on the sequencing of Summer and Winter Forward Showings, improving consistency among similarly situated participants, and better aligning revenue distributions with the season in which deficiencies occur. Participants would continue to pay monthly deficiency charges for deficient months within each Binding Season, with revenues distributed to non-deficient participants from that same season. The proposal also establishes a single annual maximum deficiency for each Forward Showing Year after both Summer and Winter Forward Showings are complete and applies the annual CONE-based deficiency charge to that highest deficiency using the applicable seasonal CONE Factor. To prevent double charging, any monthly deficiency charge previously assessed for the month that becomes the annual maximum deficiency would be credited back. The proposal retains seasonal CONE Factors to reflect differing reliability conditions while producing more consistent outcomes for participants with similar annual deficiencies.	<i>The public comment window closed on September 30. Comments were submitted by two stakeholders:</i> <i>Idaho Power Company</i> <i>SRP</i> <i>The comment window for the COSR is expected in October or November, followed by WPP Board consideration in December.</i>
Day-Ahead Market Task Force Proposal (2025 PRC Workplan Task Force 04) This task force reconvened in May 2026 to address opportunities and challenges associated with emerging Western day-ahead markets and WRAP's planned transition to Markets+. Key elements of the proposal include: (1) removing the Tariff requirement to solicit a third-party central credit organization; (2) designating the Southwest and East (SWEDE) Subregion as a subregion with a Central Hub (Palo Verde); (3) eliminating a participant's ability to reduce previously claimed Holdback Capacity on the Operating Day and moving key tagging and scheduling activities to the Preschedule Day; (4) clarifying how Energy Delivery Failures are determined for participants both inside and outside organized markets; (5) removing the distinction between Covered and Non-Covered Energy Delivery Failures; and (6) simplifying settlement provisions to reflect these operational changes and accommodate participants operating in Markets+, other organized markets, or bilateral/non-market environments. Overall, the proposal seeks to reduce operational variability, streamline compliance and settlements, and better align WRAP operations with evolving Western market structures.	<i>The COSR reviewed the key points of the proposal during the July, August, and September meetings. This proposal is not scheduled for WPP Board approval until their December meeting. WIEB staff will send a summary of the proposal to support the COSR during their comment window.</i> <i>The comment window for the COSR is expected in October or November</i>
Task Force – Data Centers & Large Loads Proposal 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 potential policy changes.	<i>The task force kicked off in late July and is holding biweekly meetings. Meeting dates/times and registration links are posted on the <i>WPP website</i>.</i>
Task Force – ELCC Methodology This 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.	<i>This task force is on hold as WPP continues to draft the proposal based in input received in June, July, and August. This proposal is not expected to be sent to the WPP Board until early 2027. The draft proposal will be reviewed during future COSR Meeting in late 2026 or early 2027.</i>