

To: Administrator Kavulla

Bonneville Power Administration

From: Brandon Oyer

Amazon Web Services

Re: Comments on WRAP Implementation for Comment Period Closing 9/17/2026

Date: September 17, 2026

Amazon Data Services, Inc. (ADS) appreciates the opportunity to submit these comments and requested actions as the Bonneville Power Administration (BPA) considers its implementation of the Western Resource Adequacy Program (WRAP). Most of ADS' load in Oregon is included in WRAP through Bonneville Power Administration as the transmission provider and Load Responsible Entity, and through Umatilla Electric Cooperative's Load Following Power Sales Agreements with BPA. With most of ADS's load subject to WRAP classified as a New Large Single Load, BPA's rates and policies require that the customer acquire and provide WRAP-eligible resources.

ADS supports resource adequacy (whether WRAP or alternative frameworks) and appreciates the importance of firm and reliable load and resource planning. Like BPA, ADS values highly reliable electric supply to critical loads. As a customer-obsessed organization, ADS is keenly focused on maintaining the highest reliability possible for AWS customers and their critical business functions. ADS' commitment to reliability has resulted in substantial investments in generation for its many data centers in the Pacific Northwest, both in the form of on-site backup generation, large scale renewable and battery storage near our loads, and firm PPAs wheeled over BPA's transmission system.

However, the currently unclear rules of the program paired with the extended timelines associated with bringing new eligible resources online require dictate that BPA and the region take a measured approach to transitioning into that future state.

To balance the important goal of resource adequacy with the ability of the region to grow and businesses like ADS to reasonably plan and adapt to changing regulatory structures, ADS requests that BPA take several definitive steps to ease the transition into full WRAP implementation. These steps are detailed below.

Background

ADS develops and operates data centers to support cloud computing services offered by its affiliate Amazon Web Services (AWS). AWS provides the world's most comprehensive and broadly adopted cloud computing services, offering over 240 fully featured services from data centers globally. Amazon.com, Inc. ("Amazon"), AWS' parent company, has invested in over 600 renewable energy projects across 28 countries, and met its goal to match 100% of the electricity consumed by its global operations with renewable energy in 2023.

ADS has been constructing and operating data centers in eastern Oregon since 2011 to serve AWS and its customers. Since 2012, AWS has invested \$54.8 billion in the state and employs over 2,500 employees that work in our Oregon data centers. We have also supported over 9,500 jobs in the region which includes jobs that build, connect, power, operate, and maintain our infrastructure. In 2025, AWS contributed significantly to the local economy through property taxes and fee payments amounting to \$71.3 million making us the highest taxpayer in both Morrow and Umatilla Counties.

Requested BPA Actions

ADS perceives two critical problems with BPA's proposed WRAP implementation at present: 1) insufficient timeline between clear programmatic design and participant implementation, and 2) extended timelines associated with interconnecting and delivering assets over the BPA system that would promote resource adequacy.

In terms of the insufficient timeline – significant aspects of the WRAP program requirements are currently in flux. In four months, BPA will require that its customers responsible for WRAP-eligible capacity submit resource information to BPA. In 16 months, absent additional products or accommodation by BPA, customers will be subject to significant penalties if they are unable to acquire sufficient qualifying resources.

At the same time, the program is still evolving, imparting significant uncertainty to entities like ADS regarding resource needs, financial risks and investments. For example, Western Power Pool is currently conducting discussions on how the WRAP tariff and business practice should be altered to accommodate large loads, including critical topics such as demand response and the reliability benefits of backup generation. These discussions may significantly alter the nature of BPA and ADS's WRAP obligations. Additionally, the exact methodology for critical elements of ADS obligations such as Effective Load Carrying Capability (ELCC) of certain types of resources is still uncertain.

In the face of these too-short timelines and fluid requirements ADS requests that BPA either:

1. By no later than Summer 2027 set rates for BP-29 to extend the WRAP product for NLSLs currently provided in BP-26;
2. Delay the binding period for WRAP participation to BP-31; or,
3. Allow load exclusion for BP-29, and work to adjust rules for any organized market that BPA enters during BP-29 to accommodate such excluded load.

In terms of the second critical problem, the extended timeline associated with interconnecting and delivering assets over the BPA system – ADS is eager to begin investing in resources that will grow with its regional loads and assure increased regional reliability. But BPA's own timelines, requirements and processes materially hinder the timely addition of such resources.

In concert with the above requests to address timeline, ADS requests that BPA:

1. Immediately adjust BPA business practices to pause any requirements that BPA studies or facilities be complete prior to the energization of behind-the-meter resources or storage devices, if such resources or storage devices are below the load at that point and are not expected to flow back on to the BPA transmission system.
2. Establish an expedited path for funding and construction of transmission facilities outside of the current queue process for customers willing to make financial commitments early.
3. Immediately allow interested utility partners to assume construction and ownership responsibilities of planned local high-voltage transmission facilities.
4. Advocate for quick clarity on appropriate WRAP accreditation or diminished resource obligations for large loads with stand-by back-up generation.

With these actions, ADS is confident that in a matter of years, the region will see material progress in grid capacity and regional resource adequacy. Absent these actions, if BPA adheres to the presently planned WRAP deadlines, BPA risks halting regional economic development and further delaying critical integration of resources into the growing grid.

Thank you for the opportunity to engage on this important topic. ADS looks forward to working with BPA to responsibly grow the system to meet the needs of our changing world.

Sincerely,

Signed by:
Brandon Oyer
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Brandon Oyer