

Submitted to BPAmarketinitiatves@bpa.gov on September 17, 2026

RE: BPA's August 17, 2026 Large Load Exclusion in WRAP Workshop

The Public Power Council (PPC)¹ continues to support the Bonneville Power Administration's participation in the Western Resource Adequacy Program (WRAP). As stated in BPA's presentation the program will provide additional visibility into the resource needs and supply balance – for both BPA and the region as a whole.

Additionally, the program incentivizes investment in much needed additional resources by establishing a common methodology for accrediting resources that accounts for the attributes of those resources and by holding entities accountable for meeting their share of the regional supply need through enforceable penalties.

PPC supports the “drivers” identified by BPA in its workshop presentation as important considerations – in particular concerns around reliability and the need to minimize cost shifts between customer classes. With this in mind, we understand how BPA ended up at its recommendation to not allow large load exclusions. Key to the agency's proposed approach is pairing that decision with a commitment to work with customers to explore potential methods, in both the short term and long-term timelines, that could help reduce the impact of requiring blanket WRAP participation.

In this effort, BPA should establish clear principles to guide solution development, including limiting financial and reliability impacts to other customers. The agency should work closely with its customers, including consulting with some of those customers' large load consumers, to identify and develop policies that would facilitate WRAP participation. This could include potential policy, contractual, and operational

¹ PPC is the umbrella trade association representing the interest of the Northwest's non-profit, public power utilities that have preference rights to the output of the federal system. PPC's members rely on BPA for wholesale power and transmission services to provide economic, reliable, and environmentally responsible power supply for the communities and businesses they serve at cost. PPC's members subscribe nearly the full firm output of the Federal Columbia River Power System (FCRPS) and a large portion of the capability of BPA's transmission system. The ability to access BPA's transmission system to deliver federal and non-federal generation to their communities is critical for PPC members.

approaches both at BPA and within the WRAP program. BPA should work with customers and WRAP to explore potential solutions including:

- Accreditation for backup on-site generation as a resource through WRAP
- Developing demand response policies that could exclude or reduce forward showing obligations related to serving that load
- Eliminating or reducing the application of the program's Planning Reserve Margin (PRM) to flat or stable loads
- Allowing limited waivers or temporary load exclusion for initial entry into the program as entities work to procure sufficient resources.

This list is not intended to be exhaustive and any of these ideas would need further vetting with BPA customers and the WRAP community before adoption. PPC requests that the agency works quickly and in concert with its customers on these solutions. There was a long break between BPA's initial decision to participate in WRAP and this decision, which has not left much time before the agency's binding participation to address the challenges that customers face with large load integration into WRAP.

We appreciate BPA's thoughtful approach to this issue and support the continued work to prepare the agency and its customers for WRAP participation. Thank you for the team's hard work developing and implementing the program.

Sincerely,

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Public Power Council