

WRAP Information Sharing

The Western Resource Adequacy Program (WRAP) is being developed to provide its Participants, and the broader western region, significantly improved reliability and substantial investment savings as we continue on our collective path towards deep de-carbonization. One of the important benefits of the WRAP will be an unprecedented level of high-quality, granular information related to all aspects of the Participants' resource adequacy. This will enable improved situational awareness for the region compared to the status quo, where necessary information is often incomplete, collected under varying methods, and of variable quality.

Understandably, there is substantial industry interest regarding the type and amount of information that will be collected by the WRAP, and the extent to which this information will be shared with neighboring regions and/or generally be made public. This paper provides the perspective of the RA Steering Committee regarding the sharing of information related to implementation (beginning with Phase 3A) and ongoing operation of WRAP.

The Steering Committee members anticipate two primary areas of information flow related to the WRAP:

First, it is anticipated that load-responsible entities (LREs) participating in the program **will be providing extensive information to the Program Operator** regarding their anticipated load and resources, as well as their import and export commitments, for each season. The Program Operator will necessarily have full visibility into this information for all of the participating LREs. This information underpins the WRAP's core function and enables it to realize the intended reliability benefits in an efficient and effective manner. This information will also be used by the Program Operator, as well by NWPP staff, to identify the evolving risks to the region's resource adequacy and to identify opportunities to potentially enhance the WRAP, under the WRAP's governance framework.

Second, it is also anticipated that the Program Operator, working in conjunction with NWPP staff and WRAP LREs, **will engage in appropriate ongoing coordination activity with neighboring regions in the Western Interconnection**. Such coordination will help support reliability across the interconnection by ensuring all regions have a common understanding of the installed physical resources and potential load conditions, as well as the aggregate resource adequacy commitments registered between the WRAP's LREs and neighboring regions. The Steering Committee members anticipate that key staff of the



Program Operator and of the NWPP, as well as representatives from the WRAP's future Participants' Committee (RAPC), will meet periodically with counterparts from peer organizations in neighboring regions to discuss ongoing coordination efforts and the sharing of specific information that advances the common goal of increased reliability. Importantly, the Steering Committee members believe such information sharing is best pursued on a peer-to-peer basis.

The members of the Steering Committee believe that both neighboring regions and the general public will **benefit from the significant increase in the quantity and quality of data arising from the WRAP.**

It is important to recognize that there will be limits to the amount of this data that will be shared beyond the WRAP, however, as the data needed to operate the WRAP necessarily includes information that could reveal the forward commercial position, and future commercial activity, of individual LREs. Critically, LREs are likely to be engaged in ongoing bilateral negotiations to purchase wholesale electricity products to meet their resource adequacy requirements, and/or to sell products that are surplus to their own requirements.

Information that reveals, directly or indirectly, the commercial position or future commercial activity of an LRE (or group of LREs) must be protected as commercially sensitive, as Participants are unlikely to be willing to continue participation in the WRAP if it undermines their commercial position or otherwise is detrimental to their ratepayers. Care must also be taken to not disclose the resource adequacy position of LREs (or groups of LREs) to other entities in the western region, who may seek to estimate the amount of surplus supply that can be expected to be available from WRAP LREs in the short-term energy markets. This could result in such supply being relied upon without entering into an explicit forward contracts to acquire a commitment of the underlying supply. It would be contrary to the reliability objectives of the WRAP to discourage participation in the WRAP or to encourage capacity "leaning" by entities outside the WRAP footprint, by failing to adequately safeguard commercially-sensitive information collected through the WRAP.

The increased quantity and quality of information related to the WRAP will provide significantly enhanced visibility into the forward supply that enables load to be served reliably in the region. Steering Committee members are optimistic that the benefits of this greater visibility can be provided to all interested parties—including neighboring regions and the general public—while respecting the sensitive nature of the information upon which the success of the WRAP ultimately depends.