

**RESOURCE ADEQUACY
PROGRAM OVERVIEW DOCUMENT**

April 27, 2026

EXECUTIVE SUMMARY

Introduction

A coalition of self-organized Extended Day Ahead Market (EDAM) Balancing Authority Areas (BAAs) and EDAM-leaning BAAs (as well as load serving entities (LSE) within a host EDAM BAA) have come together to lead the development of a regional Resource Adequacy (RA) proposal. The intent of the effort is to design a voluntary, interoperable program to leverage the diversity benefits of the EDAM footprint and complement EDAM's market-based efficiencies while ensuring that each participant maintains sufficient physical and contractual capacity to reliably meet its load obligations under a wide range of system conditions.

This Program Overview Document outlines suggested foundational principles and key design elements for a voluntary regional RA program intended to support reliable operations across the EDAM and the Western Energy Imbalance Market (WEIM). Key design elements such as governance, metrics modeling, compliance submittal requirements, resource qualification and capacity assessment, compliance structure and timelines, resource performance requirements, and reporting are foundational components that will continue to be developed with stakeholders through the initial stakeholder process.

This proposed design contemplates that initially, the voluntary program would be available to LSEs within an EDAM BAA, with an opportunity to transition over time to a BAA-based construct as regional participation and market integration mature. The program would be designed to complement EDAM's market-based efficiencies while ensuring that each participant maintains sufficient physical and contractual capacity to reliably meet its load obligations under a wide range of system conditions.

To be clear, this proposal is voluntary and is not intended to override any existing RA program. For example, many LSEs in the CAISO BAA participate in an established RA program overseen by the California Public Utilities Commission (CPUC), or their Local Regulatory Authority. Similarly, some LSEs have chosen the Western Resource Adequacy Program as their applicable RA program. This proposal is intended to provide an option for LSEs who do not fall into the aforementioned categories.

Work to date

The Program Overview Document was developed by a self-organized coalition of EDAM and EDAM-leaning BAAs. This EDAM and EDAM-leaning BAA coalition has organized itself into two groups: the RA Sponsors¹ and the RA Work Group (Work Group).² The Program Overview Document has not yet had the benefit of additional input from other potential program participants, such as LSEs within an EDAM or EDAM-leaning BAA, other prospective governing or advisory

¹ Portland General Electric (PGE), PacifiCorp (PAC), NV Energy (NVE), Public Service Company of New Mexico (PNM), the Balancing Authority of Northern California (BANC), the Los Angeles Department of Water and Power (LADWP), and Turlock Irrigation District (TID), the Imperial Irrigation District (IID)

² RA Sponsors, Idaho Power Company (IPCO), Seattle City Light (SCL), and Black Hills Energy (BHE)

bodies such as the Body of State Regulators (BOSR) or Regional Organization for Western Energy (ROWE), or the broader stakeholder community. It is the intent that an initial stakeholder process organized by the RA Sponsors and Work Group, taking place spring through fall of 2026, will provide the broader stakeholder community (including potential program participants and regulatory bodies) an opportunity to use this Program Overview Document as a guide for the development of an RA program that leverages the benefits of the rapidly expanding EDAM footprint.

Having taken the initial step of identifying suggested foundational principles and key design elements for an RA program to present to stakeholders for feedback, continued development, and refinement, the RA Sponsors desire to broaden the Work Group to other potential program participants. More details about formally broadening the Work Group will be shared at the first workshop on April 28, 2026. The Work Group will be the primary body tasked with contributing subject matter expertise and taking the pen to continue to refine, develop, and shape the proposal through the initial stakeholder process. Because this effort is being initiated by a self-organized group and does not have the benefit of using an existing stakeholder framework, the RA Sponsors and Work Group are self-funding this initial effort and encouraging Work Group members to share in this joint funding. While launching an effort outside of an established framework poses challenges, the RA Sponsors and Work Group feel the benefits of progress towards moving a proposal forward in this interim period outweigh the risks of further delaying the ability to capitalize on the reliability and customer benefits of leveraging the EDAM footprint.

Initial Stakeholder Process

After the release of the Program Overview Document, the RA Sponsors and Work Group will host a series of virtual, public stakeholder workshops. These workshops will use the Program Overview Document as a foundation to design and build the RA proposal with stakeholders. The RA Sponsors and Work Group have spent considerable time having conversations around various elements of how an RA proposal could look and within that group have reached alignment in some areas. While there has been alignment inside this group on some elements, other stakeholders have not had the opportunity to provide feedback or input. Because there has not been an opportunity for feedback to date, the RA Sponsors and Work Group did not want to release an Initial Draft Proposal (i.e., a more granular description of recommended program requirements and design) that lacks needed stakeholder engagement. The RA Sponsors and Work Group offer this initial high-level document to avoid suggesting that important program details are somehow pre-determined given the fact that the Work Group process has not been open yet outside of EDAM and EDAM-leaning BAAs.

To thread the needle of providing enough detail for stakeholders to react to in different areas to move a conversation forward while still preserving the ability for different opinions or ways of addressing design elements to be incorporated into the initial stakeholder process, the RA Sponsors and Work Group landed on the following approach. The RA Sponsors and Work Group will use the first series of workshops (spring workshops) to introduce different options to stakeholders that have enough specificity to seed the conversation for further consideration, discussion, and refinement of the key design elements. Ahead of each workshop a “Consideration Design document” will be shared with stakeholders. The Consideration Design document is not so formal as to constitute a straw or initial proposal, but functions to give enough detail for stakeholders to

be able to react to. A written comment period begins with the publication of this Program Overview document and will close two weeks after the last spring workshop, on June 10, 2026. A comment template is provided that includes questions regarding the Program Overview Document, the forthcoming Consideration Design documents, and the spring workshops; comments are welcome at any time during the open comment period. Questions posed in this document will be addressed during workshops, but written responses via comments at any point during the comment period are welcomed and helpful. The conversations, feedback, and input provided during these initial workshops coupled with written comments received from stakeholders will be used as inputs into the creation of an Initial Draft Proposal in early summer.

After an Initial Draft Proposal is shared with stakeholders (accompanied by a written comment period) in early summer, a second series of workshops (summer workshops) will be held with the goal to further develop and advance the Initial Draft Proposal. At the conclusion of the summer workshops, feedback and written comments received on the Initial Draft Proposal will inform a Revised Draft Proposal which is anticipated to be released in the fall of 2026.

After the release of the Revised Draft Proposal a concluding workshop will be held and the proposal will then be presented to the ROWE to determine whether to take it up and how to continue to move it forward, including the method for continued development, additional stakeholder process, and implementation.

For more information on workshops, materials associated with the RA initiative, and ways to participate in the initial stakeholder process, please visit <https://rowesternenergy.org/regional-resource-adequacy/>. Please note that the ROWE is not a sponsor of the initiative or the initial stakeholder process, but is lending the use of its website for hosting materials, in the same way that the Western Interstate Energy Board (WIEB) lent a landing page for posting of materials for the West Wide Governance Pathways Initiative.

Table of Contents

I. REGIONAL RA PROGRAM BENEFITS 6

II. FOUNDATIONAL PRINCIPLES 6

III. KEY DESIGN ELEMENTS..... 8

1. GOVERNANCE..... 8

A. Governance Oversight– Regional Organization for Western Energy (ROWE)..... 8

B. Stakeholder Process Oversight 8

C. Long Term Governance 9

2. RA PROGRAM METRICS MODELING 10

A. RA Metrics..... 10

3. RA PROGRAM COMPLIANCE REQUIREMENTS 12

A. Capacity Demonstration..... 13

B. Transmission Demonstration..... 14

4. RESOURCE QUALIFICATION REQUIREMENTS AND CAPACITY ASSESSMENT
15

5. COMPLIANCE STRUCTURE AND TIMELINES 17

A. Alignment with Operational Timeframes..... 17

B. Deficiency Treatment and Backstop Considerations 18

6. RESOURCE PERFORMANCE REQUIREMENTS 18

7. REPORTING & TRANSPARENCY 19

IV. NEXT STEPS 20

I. REGIONAL RA PROGRAM BENEFITS

The regional RA program is intended to enhance the reliability of the Western grid by coordinating forward capacity planning with the operational realities of the EDAM and WEIM. Today, planning and procurement responsibilities are distributed across multiple balancing authorities, each applying their own standards and methodologies. This will continue to be the case for EDAM BAAs while the EDAM Resource Sufficiency Evaluation (RSE) ensures adequate resources are available to meet next-day operational needs. A regional RA program creates transparency by establishing common accreditation methods, uniform deliverability criteria, and shared visibility into resource availability across the participating footprint. By leveraging EDAM's market data, regional load patterns, and a unified reliability assessment, the program will enable a coordinated view of system needs and resources that individual entities cannot produce on their own.

Through regional diversity sharing and common planning standards, participants should ultimately benefit from lower overall procurement obligations compared to meeting equivalent reliability requirements independently. In this way, an EDAM/WEIM-aligned RA program would strengthen grid reliability, improve transparency, reduce redundant procurement, and deliver more cost-effective outcomes for customers across the West.

II. FOUNDATIONAL PRINCIPLES

In establishing initial concepts for an RA Program, the RA Sponsors and Work Group identified a set of suggested guiding principles to aid in the discussions and to ensure that the conceptual program could work for the diverse group of BAAs. As the stakeholder process refines a conceptual design, the RA Sponsors and Work Group recommend the following principles continue to be considered:

1. Establish a common, transparent capacity counting standard, with mechanisms to incentivize adherence to the standard.

Establishing a common capacity counting standard should provide transparency and enable accountability, as well as help identify where equitable benefit sharing can occur. Given the envisioned voluntary nature of the program, it seems appropriate to pursue a balance between accountability mechanisms and potential value to participants' customers.

2. Enhance reliability by ensuring that participating entities procure adequate, deliverable capacity capable of supporting both local and system needs.

Compliance with the standard rules by all participants should provide confidence that all LSEs are procuring adequate resources that will support reliable operations even as capacity savings are realized.

3. Support efficient EDAM market operations by clarifying forward obligations, performance expectations, and the relationship between RA capacity and day-ahead scheduling, utilizing market dispatch for delivery.

Clearly defined rules and obligations should ensure that consistent resources are available for market operations.

4. Does not infringe upon or impede other regional RA programs.

Because other entities and states have different requirements and mandates around resource adequacy, this program must be able to exist alongside existing RA programs and neither create nor impact other requirements of those programs. State autonomy over RA is a building block of a successful program foundation and interoperability with existing programs in the West, such as California's RA program administered by the CPUC and the Western Resource Adequacy Program, is crucial. While interoperability is a tenet of this program principle, the logistics for how to achieve it will require continued thought, conversation, design, and robust stakeholder input.

5. Leverage transmission connectivity of the EDAM/WEIM to enable capacity savings for RA program participants and their customers.

Maximizing the use of the strong interconnection between the market entities should enhance the RA program benefits. Improved visibility of transmission connectivity through EDAM/WEIM market tools further enhances these benefits by supporting more efficient and operationally feasible RA planning and execution.

6. Minimize administrative burden and costs for participants without sacrificing reliability.

By using the existing EDAM market operator and its systems, it is expected that the costs to administer this program will be minimized. Furthermore, it is a program goal to keep costs low in order to achieve program benefits.

7. Operate as a voluntary program.

Participation in this program will be voluntary and is not envisioned to be a prerequisite for participation in EDAM, nor to prevent participation in other regional RA programs, which preserves the voluntary nature of the markets afforded to EDAM and WEIM participants.

8. Ensure non-discriminatory, comparable treatment across similarly situated program participants.

Ensure that program requirements, demonstrations, deficiency treatment and any backstop procurement mechanisms be governed by objective, transparent criteria applied consistently to support confidence.

9. Align incentives, penalties and any backstop mechanisms with cost causation and waivers that address commercial feasibility.

Consequences for non-compliance should be predictable and avoid undue exposure for participants facing constraints outside of their control, while contributing to addressing persistent deficiencies.

The RA Sponsors and Work Group seek feedback and input on the set of suggested principles to further develop and refine them with stakeholders.

III. KEY DESIGN ELEMENTS

The following section suggests a set of key design elements needed for a Resource Adequacy program. Each design element includes a narrative around different considerations that should be taken into account in the development of a program as well as particular areas where stakeholder input will be key. This document serves to introduce the elements. Consideration Design documents will be released for each element in which the subject will be described in more depth and specific questions will be posed for desired stakeholder feedback through the public comment process. The questions included in this section will be discussed during workshops and are intended to initiate stakeholder thought on each element. Written responses via comments to any of the questions at any stage of the open comment period are welcomed and would be helpful.

1. GOVERNANCE

A. Governance Oversight– Regional Organization for Western Energy (ROWE)

Governance remains a foundational issue for Western market evolution. The West Wide Governance Pathways Initiative Launch Committee published the Pathways Step 2 proposal in November 2024, creating the foundation for a fully independent governance structure that enables the West to create a suite of voluntary wholesale electricity market and related services consistent with stakeholder interest, and allowing each state to retain its unique decision-making autonomies and participate on a level playing field. Since the passage of AB 825 in September 2025, the Launch Committee has undertaken the necessary steps to establish the ROWE, with an independent board scheduled to be seated in Q3 of 2026, and staff hired in Q4 of 2026.

The RA Sponsors and Work Group propose that the ROWE be the ultimate oversight authority for the RA program. However, the RA Sponsors and Work Group propose to advance an EDAM-aligned RA program through a transitional stakeholder process while formation activities of the ROWE take place in parallel. As noted above, RA is a critical reliability function and the RA sponsors believe that significant progress can be made through this transitional stakeholder process to accelerate the ultimate adoption of an EDAM-aligned RA program.

Additionally, the RA Sponsors note that a voluntary resource adequacy program has significant differences with regard to structure and oversight compared to an energy-only market. The RA Sponsors have reviewed the Pathways Step 2 Proposal, other RA program governance structures, and comparable western organizations (RC West, WECC) and seek feedback on two separate aspects of governance: The governance of the transitional stakeholder process and the long-term governance of a resource adequacy program.

B. Stakeholder Process Oversight

The RA Sponsors and Work Group seek to advance an RA program design while recognizing that the ROWE itself is being developed. The RA Sponsors and Work Group's goal is to run an open, transparent, and inclusive stakeholder process while acknowledging the transitional nature due to the timing of the ROWE Board's seating. The RA Sponsors and Work Group are contributing staff subject matter experts to draft design documents. The RA Sponsors have also hired Utilicast as an independent facilitator of the process to advance this goal. The independent facilitator will

receive stakeholder comments and work with the RA Sponsors and Work Group to incorporate stakeholder feedback into the Initial Draft Proposal and Revised Draft Proposal.

Additionally, the RA Sponsors and Work Group note that the goal of this transitional process is to advance the design of the RA program, not finalize the design of the RA program. Once the ROWE Board is seated, the RA Sponsors will turn the Revised Draft Proposal over to the independent ROWE Board for its consideration. It will then be up to the ROWE Board to decide on next steps³.

The RA Sponsors and Work Group seek feedback from Stakeholders:

- Recognizing the transitional nature of this stakeholder process and the limited resources available to advance the RA proposal, please provide feedback and recommendations on this transitional process overall and as described in the introduction, with recommendations on how to support building trust in this process while the RA design progresses.

C. Long Term Governance

Independent governance is critical for the long-term sustainability of the RA program. Like for EDAM, the RA Sponsors and Work Group propose that the ROWE serve as the independent board overseeing this RA program and the CAISO as the program operator for the RA program. However, RA Sponsors and Work Group recognize that there are unique aspects of an RA program that may be better overseen with a different governance model adapted to RA oversight.

Beginning with the Pathways Step 2 Proposal as a foundation, RA Sponsors and Work Group seek feedback on:

- What are important elements to consider when designing a strong governance structure for an RA program?
- What governance models should the RA Sponsors and Work Group review for the RA program?
- Is BOSR's role as contemplated by the ROWE stakeholder process appropriate for state oversight of the RA program?
 - Also, BOSR currently has two public power liaisons that serve in an advisory capacity. What changes to the BOSR should be considered specifically for the RA program governance and oversight?
- What models should be considered for oversight of RA Business Practice Manual changes?
- How should the RA program approach oversight to prevent market manipulation?
- What is the appropriate stakeholder model for durable, diverse input about an RA program, and should it diverge from the general stakeholder process being developed for the ROWE?

³ This process is similar to how the independent West Wide Governance Pathways Launch Committee developed the Step One and Step Two proposals for Western governance. Specifically, the Launch Committee developed the Step One and Step Two proposals through an independent stakeholder process, with volunteer committee members from each sector, and then submitted the Step One Proposal to the CAISO Board of Governors and the WEIM Governing Body, who then took further action on those proposals.

2. RA PROGRAM METRICS MODELING

A Resource Adequacy program relies on modeling and metrics to ensure sufficient capacity is available to meet reliability objectives across a wide range of system conditions. Increasing uncertainty driven by load growth, electrification, climate volatility, renewable integration, and changing resource characteristics makes rigorous modeling essential. Robust modeling enables program administrators and stakeholders to evaluate reliability risk, account for uncertainty, and make transparent, defensible decisions about capacity requirements.

Metrics-based modeling translates reliability objectives—such as avoiding firm load shed—into actionable, comparable obligations across areas, technologies, and time horizons, while remaining adaptable as system conditions evolve.

A. RA Metrics

Stakeholder engagement is essential to the credibility, durability, and effectiveness of the RA modeling framework, and is needed across all RA metric components. Stakeholders play a critical role in:

- Shaping reliability standards and acceptable risk levels;
- Setting expectations for model transparency, documentation, and validation;
- Informing resource modeling for both commercially widespread and emerging resources;
- Defining local adequacy requirements and assumptions regarding import reliance;
- Guiding how modeling approaches evolve as the resource mix changes; and
- Helping balance tradeoffs among cost, risk, and complexity.

The RA Sponsors and Work Group propose the following core modeling metrics and analytical components be developed through the stakeholder process and have identified key questions for discussion:

a. **Reliability Standard**

Loss of Load Expectation (LOLE) and related probabilistic metrics represent the analytical foundation for quantifying reliability risk under uncertainty.

Key questions:

- How should extreme but plausible events be incorporated into reliability modeling?
- How should probabilistic results be translated into administratively usable RA requirements?

b. **Planning Reserve Margins**

The Planning Reserve Margin defines the amount of capacity required above forecast peak load to meet the program’s reliability objective.

Key questions:

- What is the right level of PRM granularity — seasonal, monthly, or hourly — and how should programs balance the accuracy gains from greater granularity against tradeoffs (e.g., procurement cost, administrative complexity, investment signal stability)?
- How sensitive should the PRM be to changes in load, resource mix, or outage assumptions?
- How often should the PRM be recalculated?

c. Load Modeling and Forecast

Accurate load modeling is essential, as load uncertainty is a primary driver of reliability risk.

Key questions:

- How should forecast uncertainty be reflected in RA requirements?
- What role should demand-side flexibility and managed load play in reliability outcomes?

d. Area Modeling

Area modeling ensures that capacity requirements reflect deliverability constraints and localized reliability risks.

Key questions:

- How much reliance on imports is acceptable during stressed conditions?
- How should deliverability constraints be reflected in RA obligations?

e. Generation and Resource Modeling

Different resource types must be modeled according to their physical and operational characteristics.

Key questions:

- How should resource modeling vary by technology?
- How should performance risks be reflected in resource modeling?
- How should correlations across resources and conditions be handled?

Metrics-based modeling is the foundation of an RA program, and thoughtful design, transparent assumptions, and broad stakeholder participation are essential to ensuring the program delivers reliable service at reasonable cost in an increasingly uncertain power system.

3. RA PROGRAM COMPLIANCE REQUIREMENTS

Clearly defined compliance submittal requirements are essential to ensuring that Resource Adequacy requirements translate into dependable reliability outcomes. Compliance submittals provide the mechanism by which load-serving entities demonstrate that sufficient qualifying capacity has been secured to meet RA obligations, enabling early identification of potential shortfalls and supporting timely corrective actions where necessary.

As system conditions become more uncertain, the structure and timing of compliance submittals take on greater importance. Submittals must balance the need for forward visibility into resource adequacy with the flexibility required to accommodate evolving loads, resource availability, and market transactions. Poorly aligned timing or unclear demonstration standards can undermine program effectiveness by masking reliability risk, encouraging late or speculative procurement, or creating unnecessary administrative burden.

The RA Sponsors and Work Group suggest several factors that guide the design of RA compliance requirements:

a. Timing and Lead Time

Compliance submittals should occur far enough in advance of the delivery period to allow for identification and mitigation of reliability risks, including opportunities for corrective actions or backstop procurement, while recognizing market liquidity and development timelines.

b. Frequency of Demonstrations

The program should consider whether capacity must be demonstrated annually, seasonally, and/or monthly, and how these demonstrations interact to balance long-term planning certainty with near-term operational reliability.

c. Level and Type of Capacity Demonstration

Requirements should clearly specify what qualifies as an acceptable demonstration, including contract characteristics, resource accreditation, locational deliverability, and performance obligations.

d. Alignment with System Operations

Compliance timelines should align with operational planning needs, including outage coordination, transmission constraints, and contingency planning.

e. Administrative Simplicity and Enforcement

Submittal processes should be transparent, standardized, and enforceable, with clear consequences for non-compliance and rules for curing deficiencies.

The RA Sponsors and Work Group suggest that the RA program compliance framework answer several foundational questions, including:

- How far in advance of the delivery period should initial and final compliance demonstrations be required?
- What mix of forward and near-term demonstrations best supports reliability while reflecting market realities?
- What minimum level of firmness, deliverability, and performance assurance is required for capacity to count toward compliance?
- How should changes in load forecasts, resource availability, or system conditions be reflected in updated compliance obligations?
- What mechanisms are needed to address late-emerging shortfalls or unforeseen resource failures?

Stakeholder engagement and input is particularly valuable in shaping submittal timing and frequency, defining acceptable capacity demonstrations, aligning compliance requirements with market and operational realities, and balancing tradeoffs among early certainty, flexibility, administrative complexity, cost, and reliability risk. Thoughtfully designed compliance requirements, informed by stakeholder input, are a core element of an effective RA program.

A. Capacity Demonstration

Capacity demonstration is as a critical element of an effective RA program because it provides the means by which reliability requirements are translated into enforceable and verifiable commitments. While planning studies and RA metrics establish the amount of capacity needed to meet reliability objectives, capacity demonstration requirements ensure that LSEs have secured sufficient qualifying resources to meet those obligations. Clear capacity demonstration rules promote accountability, transparency, and confidence that capacity counted toward RA requirements will perform when needed.

Robust capacity demonstration also provides early visibility into potential shortfalls, allowing time for corrective actions before reliability risks materialize. As uncertainty increases due to load growth, electrification, changing customer behavior, and resource transitions, effective capacity demonstration becomes an increasingly important tool for managing system reliability risk.

The RA Sponsors and Work Group suggest several core elements be addressed in designing capacity demonstration requirements, including:

a) Load Forecast and Load Obligation Determination

Capacity demonstration begins with accurate and transparent load forecasts. Forecasts should reasonably reflect expected peak demand, forecast uncertainty, weather sensitivity, and evolving load patterns. Clear translation of forecast load into RA obligations is essential so that LSEs understand both the basis for their requirements and how those requirements may change over time.

b) Resource Accreditation and Eligibility

Effective capacity demonstration depends on well-defined accreditation methodologies that reflect the expected reliability contribution of different resource types. The RA Sponsors and

Work Group suggests that resource accreditation account for factors such as availability, duration, operational constraints, performance during stressed conditions, and correlation with load, so that demonstrated capacity provides real reliability value.

c) Deliverability and Locational Considerations

Demonstrated capacity must be deliverable to load when and where it is needed. Capacity demonstration requirements should align with area or zonal adequacy rules and reflect transmission constraints, import limitations, and localized reliability needs.

In designing capacity demonstration requirements, several key questions should be addressed:

- How should load forecasts and forecast uncertainty be reflected in RA capacity obligations?
- What level of firmness, deliverability, and performance assurance is required for capacity to count toward compliance?
- How should capacity requirements adjust as system conditions, load forecasts, or resource availability change?
- How can capacity demonstration balance the need for forward certainty with flexibility to incorporate updated information?
- How should load growth assumptions be incorporated in the capacity demonstrations?
- How should non-conforming loads be treated in the load forecast modeling and capacity demonstrations?
- Should the planning reserve margin be applied to each participant's load contribution to a coincidental system peak load or to the participant's non-coincidental peak load?

The RA Sponsors and Work Group view capacity demonstration as the bridge between planning and performance in the RA program. Clear rules for determining load obligations, accrediting resources, and demonstrating capacity are essential to ensure that RA requirements deliver reliable service in practice. Stakeholder input is needed to help shape capacity demonstration requirements that are aligned with the program's reliability objectives.

B. Transmission Demonstration

The availability of firm transmission is a central, and challenging, component of resource adequacy. Across the West, long-term firm transmission availability is constrained, with limited or no available transmission capacity (ATC) on several critical paths. For example, there is no ATC on the Bonneville Power Administration transmission network to deliver generation east of the Cascades to loads west of the Cascades. Additionally, unscheduled flow management can reduce deliverability.

While non-firm transmission is frequently available, emerging system conditions, such as south-to-north flows on the California-Oregon Intertie (COI), have resulted in curtailments of non-firm service. These dynamics suggest a mismatch between resource availability and deliverability. This context raises the question of how an RA framework could establish a long-term direction for a firm transmission demonstration while maintaining flexibility in the near term.

The RA Sponsors and Work Group are considering the development of longer-term expectations for a firm transmission demonstration, alongside an interim bridging framework that reflects current transmission limitations and the lead times required to expand transmission capacity. Stakeholder input is requested on how these elements could be structured and balanced to support both durability and near-term feasibility.

The RA Sponsors and Work Group also recognize that certain circumstances—such as those involving direct access loads or other state-specific constructs—may present unique considerations. These situations may warrant exploration of whether state or local regulatory approaches are better suited to address specific issues, and how such approaches could be accommodated within a regional RA framework.

The RA Sponsors and Work Group invite stakeholder input on the following components:

- What could constitute an appropriate long-term transmission demonstration?
- What interim or bridging approaches could support progress toward a long-term objective while reflecting current transmission constraints? How might these approaches promote accountability for load-serving entities while reducing administrative burden and uncertainty associated with case-by-case waivers?
- What unique situations should be considered, and where might state or local solutions provide a more effective path? How could the RA framework accommodate those solutions?
- Are there long-term structural reforms to contract-path transmission in the West that could change the value proposition of having load-serving entities demonstrate firm transmission through an RA program?

4. RESOURCE QUALIFICATION REQUIREMENTS AND CAPACITY ASSESSMENT

Resource qualification requirements and capacity assessment are core elements of an effective Resource Adequacy program because they define which resources are eligible to contribute to system reliability and how much capacity value those resources provide. While RA planning metrics establish the total amount of capacity needed, qualification and capacity assessment determine whether individual resources can be counted toward meeting those requirements. Clear and consistent rules are essential to ensure that capacity credited for RA purposes reflects real, dependable reliability value.

As the resource mix becomes more diverse and complex, robust qualification and capacity assessment frameworks become increasingly important. Differences in technology characteristics, availability profiles, operational constraints, and performance during stressed system conditions mean that not all resources contribute equally to reliability. Well-designed qualification criteria and capacity assessments help align RA requirements with actual system needs, reduce reliability risk, and promote fair and efficient participation across resource types.

The RA Sponsors and Work Group suggest several principles that guide the design of resource qualification requirements and capacity assessment methodologies, including:

a. Eligibility and Qualification Standards

Qualification rules should clearly define the minimum technical, operational, and contractual criteria a resource must meet to participate in the RA program. These standards help ensure that only resources capable of contributing to reliability are eligible to demonstrate capacity.

b. Technology-Specific Characteristics

Capacity assessment methodologies should reflect differences across resource types, including dispatchability, availability patterns, duration limitations, environmental dependencies, operating constraints, and correlations with system load or other resources. Treating all resources as interchangeable can overstate reliability contributions and increase system risk.

c. Performance During System Stress

Qualification and capacity assessments should prioritize performance during stressed conditions, such as extreme weather events or high-risk periods. Resources that are unavailable or limited during these conditions should have their credited capacity adjusted accordingly.

d. Deliverability and Locational Requirements

Resources must be deliverable to load when and where they are needed. Qualification rules and capacity assessments should align with area or zonal adequacy requirements and reflect transmission constraints, import limitations, and local reliability needs.

e. Consistency and Transparency

Clear, predictable, and transparent qualification and accreditation rules improve confidence in the RA framework. Stakeholders should be able to understand how capacity values are determined and how changes in resource characteristics may affect accreditation over time.

Designing qualification and capacity assessment requirements raises several important questions, including:

- What minimum requirements must a resource meet to qualify for participation in the RA program?
- What resource accreditation methodologies best reflect the reliability contributions of different resource types? For example, is Effective Load Carrying Capability a reliable method to assess the capacity contribution of variable energy resources (e.g., wind and solar) and Unforced Capacity (UCAP) for thermal resources?
- How should forced outage rates, resource correlations, and operational limitations be reflected in capacity values?
- How should capacity accreditation account for resource performance during extreme or stressed system conditions?
- How often should qualification status and capacity values be reviewed or updated?
- How should new, hybrid, or emerging technologies be assessed within the framework?

Resource qualification requirements and capacity assessment represent the basis for ensuring that capacity counted toward RA obligations provides real and dependable reliability value.

Thoughtful design, grounded in physical and operational realities and informed by stakeholder input, is essential to maintaining confidence in the RA program. As system conditions and

resource technologies continue to evolve, well-designed qualification and capacity assessment frameworks will play a critical role in supporting reliable service at reasonable cost.

5. COMPLIANCE STRUCTURE AND TIMELINES

The compliance structure and associated timelines are central to ensuring that a regional Resource Adequacy program provides forward visibility into resource procurement driven by forecast load obligations and supporting reliability targets across a diverse and evolving resource mix. An effective framework should support early identification of capacity needs, enable market-based solutions, and provide sufficient opportunity to address deficiencies as the operating period approaches. Consistent with this objective, the RA Sponsors and Work Group believe that the program should prioritize market-based outcomes, including bilateral transactions, forward planning and investment in resource development and procurement, while minimizing administrative burden and preserving participant flexibility.

The RA Sponsors and Work Group consider that a regional RA program should have a multi-layered compliance framework that links forward procurement signals with nearer-term validation of resource commitments.

Stakeholder input is requested on the following questions:

- What are appropriate timing and percentage requirements
- Should the program have yearly, seasonally, monthly or any alternative combination of compliance submittals?
- Would alternative constructs (e.g., seasonal showings) better balance planning certainty with forecast uncertainty?
- Could a curated bilateral trading mechanism or similar facilitated approach support compliance at key intervals?
- What would the appropriate amount and quality of short-term contracts within capacity demonstrations be?

A. Alignment with Operational Timeframes

The RA Sponsors and Work Group envision a compliance framework that aligns with operational constructs, including EDAM. While RA programs are fundamentally planning constructs, the RA Sponsors and Work Group see potential value in exploring whether the regional diversity benefits can extend beyond the planning timeframe and into the operational timeframe.

This may include consideration of how the diversity benefits of the regional footprint can be realized through coordinated actions among participants in the near-term, particularly as system conditions and participant positions evolve closer to operations.

This may include consideration of:

- Opportunities for near-term resource sharing or rebalancing among participants, enabling more efficient use of surplus and deficit positions across the region
- Whether mechanisms such as RSE obligation sharing, reallocation, or swapping approaches could support more efficient outcomes in the operational timeframe

Stakeholder input is requested on the following questions:

- How can the program best bridge planning and operational constructs?
- Could coordinated approaches to sharing or reallocating obligations enhance the realization of regional diversity benefits in the operational timeframe, based on evolving operational system conditions?

B. Deficiency Treatment and Backstop Considerations

An effective compliance framework will require mechanisms to address situations where participants do not meet their obligations. While specific approaches remain to be developed, RA Sponsors and Work Group envision a regional RA program that will include a combination of incentives and accountability measures to support reliable outcomes.

Considerations may include:

- Structures that encourage timely procurement and discourage persistent deficiencies.
- Clearly defined consequences for non-compliance, while avoiding unnecessary rigidity.
- Deficiency penalties that are capped and aligned with cost causation.
- Limited and carefully scoped backstop mechanisms to address residual shortfalls where market solutions are insufficient.

The RA Sponsors and Work Group suggest that reliance on centralized procurement or administrative solutions should be minimized where possible, in order to preserve and strengthen the role of the bilateral procurement market. However, the potential role of a regional, programmatic backstop construct, as a last-resort reliability tool, remains an area for stakeholder discussion, as well as potential state- or BAA-specific mechanisms where multiple LSEs exist within a single BAA.

Stakeholder input is also requested on the following question:

- How should the program address non-compliance, including consideration of de minimis thresholds, repeated deficiencies, and appropriate escalation or enforcement approaches?

6. RESOURCE PERFORMANCE REQUIREMENTS

One of the goals of a Resource Adequacy Program is to establish a common capacity counting standard, with mechanisms to ensure that resources can achieve the capacity they are credited for. Therefore, the program should have robust resource performance requirements to ensure that resources are performing when needed during an event. For the RA program to be successful,

the program administrator needs confidence that the capacity for submitted resources is accurate and resources perform operationally as intended. Resource performance requirements are a pillar of an RA program by holding resources accountable under stressed conditions when they are needed the most, ensuring that system loads are reliably met. These requirements should be equitable to ensure all resources are counted fairly and are not over or under counted within the program, and could be used as a feedback loop to ensure the program has an appropriate design.

In addition to determining how to equitably count resource capacity within the program, stakeholders should consider the data required for the performance requirements. Resource and operational data from WEIM and/or EDAM could be leveraged to support resource registration and performance measurement. Leveraging market operations data could reduce administrative burden and ensure consistent data collection. Participants could submit supplemental data if market data does not fully reflect a resource's capabilities, or the program requires more data that is not available from market operations. However, utilizing already existing functions or workstreams may support the overall success of the program. Therefore, stakeholders may want to consider tradeoffs with the resource performance requirement design and potential efficiencies that could be utilized.

Stakeholder input is needed to help establish the resource performance requirements. The following questions may be helpful to consider during this process:

- When using market data, should the data cover the entire year, the binding season only, or following an event?
- When market data is not available, how should participants demonstrate resource performance?
- At what frequency should data be submitted or reviewed?
- What should be considered if a resource under performs consistently within the program?
- Should the program review the design and potentially change the resource counting metrics?
- Should the resource be required to perform a performance test during a certain set of conditions, which may impact its accreditation in the program?

7. REPORTING & TRANSPARENCY

Reporting and transparency are key to providing participants with the ability to hold an RA program accountable and ensure the program is operated in a fair and equitable manner. Reporting and transparency are staple elements in many RA constructs, and in many instances, are required.

Robust reporting and transparency can build confidence and trust in the program, provide participants with a status of how the program is performing, and can help identify areas for needed improvement or if changes to the program are working as intended. Additionally, reporting can provide additional insight into resource adequacy throughout the greater region. When designing what type of reporting is needed, stakeholders should consider how the program could balance and respect the confidentiality of individual entities as well as the potential for information to be used for market manipulation.

The following questions may be helpful to explore during stakeholder process:

- What information and data should be published? Should the information reported contain granular generator and LSE-specific data, or reported in an aggregated format?
- How should this information be reported? Does the information need to be presented in a formal meeting or will simply publicly posting the report suffice?
- How frequent should information be reported? For example, annual vs quarterly reports.

IV. NEXT STEPS

As mentioned above, a written comment period begins with the publication of this Program Overview document and will close on June 10, 2026, two weeks after the last spring workshop. Numerous questions are posed within this document that will be addressed during the upcoming workshops, but any written responses would be helpful at any point during the open comment period. A comment template with questions regarding the Program Overview document, the forthcoming Consideration Design documents, and the spring workshops has been posted for stakeholders to utilize and is located at <https://rowesternenergy.org/regional-resource-adequacy/>. Please send all written comments to resourceadequacy@rowesternenergy.org. In addition to submitting written comments by June 10, 2026, please attend and actively participate in the spring workshops. The spring workshop schedule with the zoom link for each workshop is posted on the website.

The RA Sponsors and Work Group look forward to working with stakeholders to develop a voluntary, regionally coordinated Resource Adequacy proposal designed to align with participation in WEIM and EDAM, supporting resource adequacy across the Western Interconnection through a framework that enhances reliability, improves coordination, and reflects evolving market structures.