

Consideration Design Document: Compliance Submittal Requirements, Load Forecasting, and Transmission

Stakeholder Workshop #4: May 21, 2026

I. Introduction

The RA Sponsors and Work Group have created a series of Consideration Design Documents to provide a starting point for the conversation with stakeholders around the joint development of key design elements for a Resource Adequacy program. The content offered in these documents is intended to give stakeholders enough specificity to provide constructive feedback and frame a discussion but should not be construed as a firm proposal. The concepts in this document represent possible design options that the RA Sponsors and Work Group have been able to coalesce around to present to stakeholders for input as an initial starting point. Written comments and discussion during the spring workshops are meant to draw out areas of stakeholder support, identify questions that need to be answered, flag issues that may require continued refinement through the initial stakeholder process and determine areas that will need a different approach. It is intended that stakeholders will review this document in preparation for Workshop #4 held on May 21, 2026. All documents and workshop information including the Zoom link are posted publicly at: <https://rowesternenergy.org/regional-resource-adequacy/>

II. Background

A regional Resource Adequacy (RA) program is intended to provide participants, regulators, and other stakeholders with confidence that sufficient resources should be available to serve load under a range of system conditions. To achieve this, the program must be supported by clear and consistent policies that allow stakeholders to understand how obligations are determined and how compliance is demonstrated.

Well-defined compliance submittal requirements promote transparency and predictability, enabling participants to plan effectively while allowing oversight entities to assess program performance on a comparable basis.

A common approach to load forecasting helps ensure that resource adequacy targets are grounded in realistic and consistently applied expectations of future demand. Each participant likely has proprietary methods for forecasting load. A common method at the program level, while likely not as intricate, creates consistency among participants and minimizes potential for individual results to be based on varied assumptions when calculating a value.

Requiring a demonstration of connectivity of resources to load provides assurance resources claimed in a compliance submittal can serve customers under the stressed system conditions a RA program is meant to address.

Together, these policy areas support a shared framework that balances flexibility for participants with the reliability outcomes stakeholders expect.

III. Proposed Draft Policy Language – Compliance Submittal Requirements

A. Annual Compliance Submittal

Each participant is envisioned to demonstrate, for each month of the compliance year, at least 90 percent of its applicable capacity requirement and whatever its applicable transmission requirement is. These partial showings are intended to support year-round resource adequacy by demonstrating that participants are making sufficient progress toward meeting their full compliance obligations.

The Annual Compliance Submittal, proposed to be due by October 15th, may be informational in nature and may not be a compliance determination. Failure to meet the 90 percent or the transmission demonstration thresholds would not result in penalties, charges, or violations of program requirements. Further discussion if penalties should apply for the annual showing and if only the monthly showing will face penalties will be considered through a separate program determination. This filing is intended to provide transparency to participants and stakeholders, enable early identification of potential compliance risks, and support participants' planning in advance of final monthly compliance submittals.

B. Monthly Compliance Submittal

Each participant is envisioned to demonstrate 100 percent of its applicable monthly capacity requirement and a transmission requirement that will be driven by a consensus, after a robust discussion around grid realities and market analysis. The Monthly Compliance Submittal would be submitted no later than 60 days prior to the applicable operating month.

At this stage of the program, the capacity and transmission demonstrations are intended to carry financial risk if the applicable requirements are not met. The specific charge amounts, assessment methodology, and enforcement mechanics associated with non-compliance will be established through a separate program determination and are not described here.

Requiring a full 100 percent capacity demonstration on a monthly basis provides important reliability benefits. This requirement ensures that participants have fully secured the resources necessary to meet their obligations prior to the highest-risk operating periods, reduces the likelihood of last-minute procurement shortfalls, and increases confidence in the system's ability

to withstand seasonal variability and unexpected system conditions. The Monthly Capacity Submittal serves as a final confirmation that forward procurement is complete and that participants are prepared to reliably serve load under both expected and stressed conditions.

C. Capacity Requirement

A participant's monthly capacity requirement is envisioned to be based on a monthly Planning Reserve Margin (PRM) applied to a monthly load forecast value. The origin of the load forecast value will be discussed in a subsequent section on a proposed load forecast methodology.

D. Planning Reserve Margin

Planning Reserve Margins (PRM) would be calculated and applied on a monthly basis to reflect seasonal variation in load, resource availability, and system reliability risk. Monthly PRM granularity enables the program to align reserve requirements more closely with actual system conditions in each operating month, rather than relying on annual averages. The PRM would be uniform across all participants within a given month.

E. Capacity Demonstration

Participants are envisioned to submit a compilation of resources with Qualifying Capacity (QC) values in their annual and monthly Compliance Submittals to demonstrate sufficient capacity to meet the program's capacity requirement for each month of the compliance year. Generation resource QC values would be provided by the Program Service Provider (PSP) as an annual modeling output. QC values for energy and capacity contracts would not be determined by the PSP.

Comment is sought on the following questions:

- 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 should be 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?

IV. Rationale and Policy Considerations – Compliance Submittal Requirements

The program design elements outlined above are proposed to enhance transparency, improve planning discipline, and support market-based solutions to emerging deficiencies. The Annual Compliance Submittal of a 90 percent capacity demonstration is intended to provide early visibility into aggregate system conditions and potential shortfalls, allowing participants and stakeholders to assess risk well in advance of the operating period. This forward look is designed to encourage timely resource procurement or bilateral transactions by signaling where capacity may be needed.

Monthly PRM values are proposed to better align reserve requirements with seasonal variations in load, resource availability, and reliability risk, thereby improving the accuracy and relevance of RA obligations. Finally, monthly compliance submittals due 60 days ahead of the operating month, demonstrating 100 percent of program requirements, provide a clear and enforceable checkpoint that procurement is complete before each operating month. Together, these elements are intended to balance transparency and confidentiality, promote efficient resource procurement or bilateral market activity, and strengthen confidence in the program's ability to support reliable system operations.

The appropriate level of detail to be shared with the compliance submittals, particularly for the Annual Compliance Submittal, remains to be determined to protect commercially sensitive information.

V. Proposed Draft Policy Language – Load Forecasting

A. Monthly Load Forecast Determination

The program proposes a coincident peak load forecasting methodology grounded in a five-year historical lookback period based on regional coincident peak loads. Under this approach the median (P50) coincident peak load would be calculated using the actual coincident peak loads of the program footprint for each month from the past five years. A participant's individual contribution to the coincident system peak is proposed to determine the basis for its load forecast value. The RA Work Group anticipates that this particular individual participant calculation methodology may require deeper evaluation and discussion by potential participants and other stakeholders.

Participants' individual P50 coincident peak load forecasts would be determined and provided alongside other program metrics. These forecasts could be issued no later than two years prior to the start of the applicable Compliance Period to support advance planning and procurement activities.

A default load growth percentage could be applied to the P50 load forecast. The specific value of this default growth rate remains to be established and would be subject to further program development and stakeholder input.

Participants could propose adjustments to the default load growth assumption where individual circumstances materially affect expected load trajectories. Such circumstances may include, but would not be limited to, significant anticipated load expansions, material load reductions, or jurisdiction-specific policy drivers. Any proposed adjustment would be submitted in advance of the Monthly Compliance Submittal and supported by transparent documentation demonstrating how and why the participant's expected load trajectory differs materially from the regional default assumption.

Comment is sought on the following questions:

- How should load forecasts and forecast uncertainty be reflected in RA capacity obligations?
- 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?
- Would coincident peak load evaluation based on the hours of highest load, or the peaks on highest load days be a more beneficial alternative? Would analysis of whether an expanded data set would potentially change results or show additional stability be helpful to explore?
- Is input on how to account for changing load patterns and whether projected load shape changes be considered when assigning coincident peak contributions for future years warranted?
- Is the five-year historical look back the appropriate period to determine the basis for the load forecast value?
- How should Demand Response, Energy Efficiency, Behind-the-meter Distributed Energy Resources adoption be incorporated into the determination of participants' load forecast?

VI. Rationale and Policy Considerations – Load Forecasting

The coincident peak load forecasting methodology is proposed to better align each participant's resource adequacy obligation with its contribution to system-wide stress conditions. By basing requirements on coincident system peaks rather than individual gross load peaks, the methodology would more accurately reflect the periods when the system is most at risk and capacity is most valuable. This approach could improve equity among participants by tying individual obligations to their relative impact on overall system reliability during stressed conditions.

In addition, a coincident peak framework could create more effective incentives for demand reduction and load-control actions during system-wide stress events, rather than during participant-specific peak hours that may not align with broader reliability needs. Aligning load obligations with coincident peaks may also support more efficient operational signals by encouraging behavior that reduces aggregate system risk. Overall, the methodology is intended to better integrate participant actions with regional reliability outcomes.

The RA Work Group recognizes that some participants may serve large non-conforming loads, such as customers with on-site generation, curtailable demand, or load profiles that do not increase during system-stress conditions. These loads may warrant differentiated treatment within the load-forecasting or accreditation framework to ensure they are accurately represented and do not distort system-wide resource adequacy assessments. While no specific methodology is proposed at this time, the RA Work Group is seeking stakeholder input on modeling approaches and analytical proposals for how such loads could be appropriately incorporated into the regional RA program's forecasting and compliance structure.

The RA Work Group also recognizes that further load-serving entity and other stakeholder discussions may be warranted about the merits and any identified downsides of the coincident peak load approach and individual RA obligations based on participants' relative impact on that peak load.

VII. Proposed Draft Policy Language – Transmission

A. Transmission Demonstration

Participants would be expected to demonstrate firm, conditional firm, or Network Transmission from generation to load for some to-be-identified portion of the capacity requirement at the time of the final Monthly Compliance Submittal, which is proposed to occur 60 days prior to the applicable compliance month. The RA Work Group anticipates a deeper evaluation of potential transmission paths or legs that might have more stringent program requirements than other paths or legs.

Where Network Transmission is not relied upon, participants could be required to provide relevant OASIS transmission information in order to demonstrate complete and feasible transmission paths.

B. Exceptions and Alternate Transmission Compliance

Participants could request exceptions to the transmission demonstration requirement where current system conditions warrant alternative treatment, such as outages, derates, system constraints, or pending firm transmission requests in the queue. The criteria and process for evaluating such exceptions would be documented in the program's Business Practice Manual (BPM).

Some questions the Work Group seeks feedback from stakeholders on are:

- How should the need to demonstrate transmission from generation to load be balanced with current system constraints and challenges in acquiring firm transmission?
- What actions could demonstrate that a participant is working to cure their transmission demonstration shortfall?

VIII. Rationale and Policy Considerations – Transmission

Transmission demonstration requirements are a way to increase confidence that capacity relied upon for RA can be delivered to load during periods of system stress. Participants may also see value in a consistent regional framework that clarifies expectations and reduces uncertainty around how deliverability is assessed across the footprint.

At the same time, RA Workgroup members recognize that regional transmission constraints, evolving system conditions, and development timelines may limit the feasibility of strict transmission demonstrations in all cases. Accordingly, flexibility mechanisms and exception processes are important to ensure the program can accommodate legitimate system limitations without undermining overall reliability objectives. This balance could allow participants to meet RA obligations in a credible manner while preserving operational and commercial flexibility.

The RA Work Group notes that transmission requirements are a uniquely challenging RA program feature in the West, compared to RA programs in other regions, due to the contract-path, point-to-point transmission paradigm that remains the norm in the West. Further stakeholder and potential program participant input is needed on this topic.

IX. Next Steps

The concepts introduced in this document will be discussed during the May 21 public stakeholder meeting. A written comment period for additional feedback will be open through June 10. Stakeholders are greatly encouraged to submit written comments using the comment template to resourceadequacy@rowesternenergy.org. The comment template, details on upcoming workshops, and all materials pertaining to the initial stakeholder process can be found by visiting <https://rowesternenergy.org/regional-resource-adequacy/>