

EDAM Resource Adequacy Workshop #5: Transmission, Compliance Structure, Reporting and Transparency

May 26, 2026

Agenda

- Transmission
- Compliance Structure
- Reporting and Transparency
- Adjustments to Initial Stakeholder Process



Transmission

Transmission Demonstration

- Expectation to demonstrate firm, conditional firm, or Network Transmission from generation to load
 - To-be-identified portion of the capacity requirement at the time of the final Monthly Compliance Submittal (occur 60 days prior to applicable compliance month)
- Firm transmission rights are an essential component of a resource adequacy demonstration; however, consensus has not been reached on the amount of firm transmission (e.g., 75%) or what demonstration requirements should be included
 - The RA Sponsors offer 75% as starting point for the conversation
- 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 to demonstrate complete and feasible transmission paths

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
- Criteria and process for evaluating exceptions would be documented in the Business Practice Manual (BPM)

Questions

- What type of transmission requirement would best fit the program? Would a 75% showing be appropriate?
- What demonstration could support an RA participant's best efforts to acquire transmission where no long-term firm transmission is available on a required path?
- 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?



Compliance Structure

Compliance Structure

- Compliance Submittals
- Binding Months
- Compliance Determination
- Operationalization

Compliance Submittals

Participants are envisioned to submit one Annual Compliance Submittal and up to 12 Monthly Compliance Submittals each year

Annual

- Due October 15th
- Require a demonstration of 90% of the capacity requirement and a transmission requirement
- Not intended to be a binding demonstration; functions to provide visibility of the state of the regional RA need
- Participants could demonstrate up to 100% of respective monthly requirements if desired
- Application of penalties TBD

Monthly

- Due 60-days in advance of the applicable month
- Require 100% compliance with the capacity requirement and a transmission requirement
- Intended to be a binding submittal during binding program months
- Penalties would likely apply

Binding Months

- Only designated peak-demand months may carry binding capacity and transmission procurement obligations
- Binding periods are intended to align enforcement and financial accountability with the months in which regional reliability risks are highest
- Specific timing and duration of binding periods would remain subject to review and could be adjusted over time to reflect observed system stress conditions across the program footprint
- Geographic diversity will be considered when defining peak-demand months
- Further discussion of whether penalties should apply for every month with different penalties applying in peak and non-peak months will be considered through a separate program determination

Binding Months

- For non-peak or shoulder months, capacity and transmission demonstrations would be informational and would not carry binding compliance obligations
 - This approach is intended to recognize the relatively lower reliability risk during these months while supporting transparency and forward planning
 - If penalties throughout the year are deemed appropriate during policy design, lower penalties during non-peak months may be applied
- The Program Service Provider could conduct reliability analyses to identify which months present elevated system risk and should be designated as binding for compliance purposes
 - Anticipate some level of multi-year predictability about the binding months would be valuable for participants

Compliance Determination

- The RA Work Group has not yet identified a preferred framework for administrative charges or other remedies associated with a participant's failure to demonstrate 100 percent of the capacity requirement and/or the transmission requirement
- The design of any such compliance mechanisms will be further developed and refined through the stakeholder process

Operationalization

- The RA Work Group is considering an operational window that could provide participants with a final opportunity to transact and leverage regional diversity prior to the EDAM Resource Sufficiency Evaluation (RSE)
- This operational window is intended to support efficient market outcomes and risk mitigation ahead of real-time operations
- The specific design and technical details will be further developed and refined through the stakeholder process

Questions

- What are appropriate timing and percentage requirements?
- Should the program have yearly, seasonal, 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 a similar facilitated approach support compliance at key intervals?
- 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?
- Should the program determine the transmission percentage requirement after performing analysis regarding regional transmission connectivity? If so, what would be an appropriate scope for that analysis?



Reporting and Transparency

RA Metrics Report

- The PSP is envisioned to present RA study results and associated metrics, including binding and advisory PRM values and ELCC study results, to the ROWE Board of Directors
- Prior to publication, program participants and potentially other stakeholders would have an opportunity to review the results with the PSP to facilitate a technical discussion before being finalized and released for public consumption

Annual Report

- On an annual basis the PSP and Technical Oversight Committee (TOC) would report to the ROWE Board of Directors and Regulatory Advisory Group (RAG) on the status of the Yearly Compliance Submittal
- This report would reflect the aggregated results of the October 15 annual compliance submittals
- The TOC, RAG and ROWE Board of Directors may also request the PSP or TOC to report on other program topics
- The annual report is intended to provide visibility and be a forum for gauging program performance

Questions

- What information and data should be published publicly?
- Are there any proposed methods that could be considered to maintain confidentiality while balancing the need for program transparency?
- 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.
- How should the ROWE's other stakeholder forums be integrated into this reporting process?



Adjustments to Initial Stakeholder Process

Adjustments

- The spring workshops have proved to be a valuable barometer of gaining an understanding of how stakeholders are reacting to proposed design elements
- Written comments will help provide further insight but at this stage based on stakeholder feedback, the RA Sponsors and Work Group are adjusting the approach to the initial stakeholder process
- Because the goal is to be able to present a proposal to the ROWE that has broad support by all entities impacted by the program the initial stakeholder process timeline is being extended

Adjustments

To allow for more collaboration and time with stakeholders in designing the program, the following adjustments are being made:

- Extending the initial written comment period to June 17
- Wait until the fall to draft an Initial Proposal- use the summer to develop program design elements with stakeholders through workshops
- To provide time for stakeholder comments and feedback on an Initial Proposal, push out timeline for delivering a draft proposal for consideration to the ROWE to the end of 2026, rather than the fall timeframe

Next Steps

- Please submit comments
 - Written feedback and comments are a valuable tool to help provide directional guidance to the RA Sponsors and Work Group
 - Types of feedback that would be most helpful at this stage:
 - Directional feedback on proposed program design elements
 - What proposal elements do you support?
 - What proposal elements if adopted could pose challenges?
 - Issues to consider in development of design elements
 - Specific topics for summer workshops

Submit comments to resourceadequacy@rowesternenergy.org

Comments due by **Tuesday, June 17**

Next Steps

- Summer workshops
 - The RA Sponsors and Work Group will begin scoping the summer workshop topics and schedule over the course of June
 - A workshop on June 25 (9:00-11:00PT/10:00-12:00MT) will be held to communicate out more specificity about the summer schedule

Where to find materials



All workshop dates, **zoom links**, and materials are located at:
<https://rowesternenergy.org/regional-resource-adequacy/>



Reach out with questions or comments by emailing:
resourceadequacy@rowesternenergy.org

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.

Open Forum for Discussion



- Please raise your hand to be unmuted
- Announce your affiliation/entity you represent