

# Regional Resource Adequacy Workshop #11: Transmission and Governance

September 3, 2026

# Agenda

- Transmission Requirement Draft Straw Proposal
- Governance Update
  - RA Program Operational Roles
  - Policy & Process Governance
    - Stakeholder Process: Tariff Changes
  - Technical Review Committee (TRC)
    - Structure
    - Open Meetings
  - BOSR Role
  - Business Practice Manuals

# Transmission Requirement Draft Straw Proposal



# Proposal at a glance

The revised approach establishes a distinction between constrained and secondary transmission legs, simplifies compliance administration, and narrows exceptions for transmission deficiencies based on inherent flexibility in core design.

## Core structure

Transmission legs are classified as constrained or secondary, with a more stringent demonstration applied to constrained legs. The classification methodology will be determined later and may incorporate historical curtailment data.

## Monthly showing

Require a transmission demonstration at the monthly compliance showing — qualifying firm, conditional firm, NITS, redirectable firm or conditional rights on the same transmission system, or an equivalent TSR queue position.

## Cure principle

Require the participant to procure the highest-quality transmission available during the cure period, using an attestation approach rather than continuous program validation.

## Non-firm use

Permit non-firm as a limited cure tool only when the firm or conditional firm options to comply with the transmission requirements for the constrained and secondary legs, respectively, are not available.

## Exceptions

Retain narrowly framed case-by-case exceptions — for example, transmission outages and derates.

## Operational handoff

End the RA cure process for constrained legs before the applicable EDAM modeling, registration, or bid-submission deadline. The exact cutoff remains open pending EDAM and transmission-provider timelines.

# Design principles

Preserve reliability without making firm-service scarcity an automatic compliance failure

01

## Reliability first

Load-serving entities (LSEs) shall pursue the highest-quality transmission available.

02

## Flexibility when firm is unavailable

Recognize constrained firm ATC and short-term release timing without making non-firm the default RA compliance product.

03

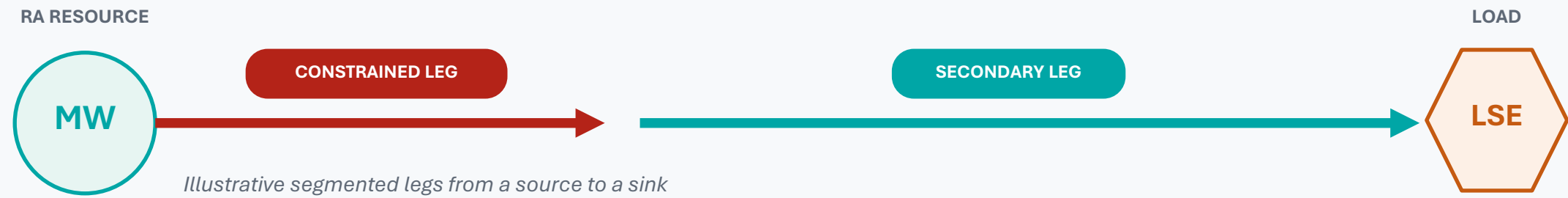
## Administrative simplicity

Combine a 60-day forward showing, a cure period with attestations, and retrospective reporting for secondary legs.

**Design test: Is the requirement reliability-based, workable under real transmission release timelines, and simple enough to administer consistently?**

# Classify each delivery leg

Compliance treatment depends on whether the leg presents a material deliverability concern



## Constrained leg

A segment designated under an approved methodology as presenting material deliverability concern during capacity-critical conditions. Methodology remains open; may draw on historical curtailment and constraint data, with a Transmission Service Provider (TSP)-input starting point.

## Secondary leg

Any segment not designated as constrained. “Secondary” means less stringent compliance treatment, not that the leg can never bind.

## Geographic framing

Potential simplification: frame compliance from a regional hub or BA border to the point of delivery. Hub-to-load only when paired with LD or equivalent firm-delivery provisions.

**Periodic reassessment may move legs between classifications as system conditions and TTC/ATC change.**

# Monthly transmission demonstration

Apply the showing to the MW quantity associated with the participant’s QC requirement

**MONTHLY  
SHOWING**

**[75%]**

This percentage is still  
under discussion

**of associated QC  
MW**

## Constrained legs

Qualifying transmission may include: firm PTP, conditional firm PTP, NITS at NERC priority 6 or 7; an equivalent TSR queue position; or redirectable firm/conditional rights to an alternate POD on the same system.

## Secondary legs

Demonstrate transmission or a qualifying deliverability commitment for [75%] of the associated MW. Procure firm or conditional firm when reasonably available. Constrained-leg products also satisfy this requirement.

**If short-term product release  
occurs after the monthly  
showing**



**Identify the expected product and complete procurement  
during the cure period, subject to cure conditions.**

**Open mechanics: monthly showing percentage, redirect eligibility, “reasonably available” standard, and TSR-queue procurement obligation.**

# Cure and quality improvement

The cure period closes a genuine gap; it is not a general option to enter compliance uncovered and reliant wholly on non-firm



**NON-FIRM GATE**  
(under discussion; no Work Group consensus yet)

Allowed only when firm PTP, conditional firm, and NITS are unavailable (and demonstrated); paired with a binding firm-energy commitment (e.g., WSPP Schedule C) and enforceable LD damages; procured by the cure cutoff. An RA penalty adder may apply.

Open policy issue: Can non-firm cure all or only part of a constrained-leg deficiency?

# Limited exceptions and special treatment

Exceptions remain narrow because the core design provides flexibility

## Outage or derate

No penalty for an eligible unplanned transmission outage or derate. Mechanics still need to distinguish events occurring before versus after the monthly forward showing and define possible restoration obligations.

## Curtable load

LSEs with load contractually committed to be curtailed on a transmission non-delivery may be exempted from obtaining transmission for that load, programmatically or through the QC obligation. May require the host BA to control load shedding based on tag curtailments.

## Host-BA option

Where authorized by the local regulatory authority, an LSE serving retail load in another LSE's host BAA may rely on an eligible host-BA queue position or arrangement, supported by a joint attestation. An LSE's own equivalent queue position gets the same treatment.

**Common requirement: documented eligibility, defined quantity and path, clear responsibility, and auditable support.**

# Verification, consequences, and learning

Use risk-based oversight and periodic reassessment rather than continuous transaction monitoring

**Verification for use of non-firm** Use attestation and record retention as the primary method; targeted review on complaint, audit, deficiency, or delivery failure

**Non-firm reporting** Report curtailment-related delivery failures and the affected MW quantity and period

**No continuous monitoring** Avoid a standing requirement for the PSP to monitor weekly purchases or reconstruct transmission availability continuously

**Leg reassessment** Periodically update constrained and secondary designations under an approved methodology; align with Transmission Provider planning cycles and give advance notice

**Consequences of non-delivery** Apply contract remedies and enforceable LDs; calibrate any RA penalty and avoid duplicating market charges

**Program learning** Standing taskforce monitors effectiveness and evaluates transmission optimization alongside EDAM's common network model

# Open Issues

The following open issues will need further discussion and development with stakeholders.

|                                                                                                                         |                                                                                                                                          |                                                                                                                   |
|-------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|
| <b>1. Compliance percentage</b><br>Confirm [75%] or another percentage for constrained and secondary legs.              | <b>5. Shorter term transmission product timing</b><br>Document when monthly/weekly/daily products post and shorter-product availability. | <b>9. Classification method</b><br>Define methodology, data sources, reassessment cadence, and transition notice. |
| <b>2. Non-firm cure limit</b><br>Whether non-firm may cure, and if so all or only part of a constrained-leg deficiency. | <b>6. Evidence standard</b><br>Finalize attestation language and targeted-review documentation.                                          | <b>10. Redirects mechanics</b><br>Determine how redirects are used for monthly compliance and cure.               |
| <b>3. Cure cutoff</b><br>Confirm EDAM deadlines; select [X days] before the operational deadline.                       | <b>7. Outage/derate mechanics</b><br>Define eligibility, notice, duration, and restoration obligations.                                  | <b>11. TSR-queue obligations</b><br>Whether to require ongoing procurement while holding the queue position.      |
| <b>4. Non-delivery penalties</b><br>Whether to add a penalty on top of LDs and how it connects to the must-offer phase. | <b>8. Curtailable load</b><br>Set the resource/load-side showing and alignment with commission requirements.                             |                                                                                                                   |

# Governance Update



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## **RA Program Operational Roles**

Feedback from stakeholders provides general support for the program operational roles and responsibilities.

These are the institutional entities responsible for developing, implementing, and overseeing the Regional RA Program.

**Independent Board:** ROWE Board

**Program Coordinator:** ROWE

**Program Service Provider:** CAISO

**Program Assessor:** Dept. of Market Monitoring

# Policy & Process Governance: Stakeholder Process - Tariff Changes

- The main stakeholder process of any RA Program Tariff design would occur through the ROWE Stakeholder Process consistent with the Pathways Step 2 Proposal, with slight adjustments to incorporate RA as an additional voluntary ROWE service offering.
- The Catalogue and Roadmap process would add two new categories for initiatives:
  - Resource Adequacy Compliance Initiatives
  - Resource Adequacy Discretionary Initiatives
- RA Initiative prioritization would occur by:
  - Stakeholders through the Roadmap process, or
  - The Technical Review Committee (TRC) prioritizing an issue through its own majority vote, feeding into the Roadmap process
- The stakeholder process for RA Initiatives would be subject to the same working group structures and indicative voting, including the remand process.

# Policy & Process Governance: Stakeholder Process - Tariff Changes

- In the stakeholder initiative phase, when a Draft Final Proposal is brought to stakeholders for indicative voting it will be also brought to the Technical Review Committee (TRC).
- During an indicative vote a remand may be triggered in two ways:
  - Through the existing ROWE Remand Process or
  - By a majority vote of the TRC
- As with all such processes, it is anticipated that the stakeholder process may evolve to reflect lessons learned.

# Technical Review Committee (TRC): Structure

- The TRC will act as the ‘RA Program Sector’.
- An RA Program Participant would be defined as:
  - A load serving entity (LSE) within a Balancing Authority that is participating in either WEIM or EDAM that voluntarily chooses to participate in the Regional RA Program and has load subject to the RA showing and compliance obligations.
- Any Program Participant will receive a seat on the TRC.
- A BOSR liaison will sit on the TRC.

# Technical Review Committee: Open Meetings

- TRC meetings that discuss issues surrounding tariff initiatives will generally be open to all stakeholders and follow the open meeting and data sharing rules of the ROWE.
- Advanced notice of the date, time, location and an agenda will be published.
- All TRC decisional items will be placed in any open meeting agenda and allotted adequate time for public comment and deliberation.
- The TRC may discuss commercially sensitive information in closed executive sessions (to be determined by the TRC Chair). However, closed executive sessions are anticipated to be the exception, not a routine occurrence, and cannot be convened for mere convenience.
- No action on any Tariff or BPM can be taken by the TRC in executive session.
- The BOSR liaisons may attend the TRC executive session under confidentiality provisions applicable to all TRC members.
- The TRC will provide a written public agenda for any executive session to indicate the general topics discussed.

# Body of State Regulators (BOSR) Role

- To appropriately scope the role of the BOSR, better definition and further development of the RA program scope and structure is needed.
- The RA Sponsors are working with BOSR representatives to develop an appropriate oversight role for the BOSR, including the role of public power.

# Business Practice Manuals

- The ROWE Board has the ultimate authority to resolve disputes about any RA-related business practice manual (BPM) that carries out a tariff provision under RO sole authority.
- ROWE staff, as program administrator, would likely continue to administer the day-to-day, or week-to-week, process of developing potential changes to BPMs.
- All stakeholders will have an opportunity to provide input and feedback on BPMs.
- Additionally, temporary or standing work groups consisting of stakeholders that are not TRC members (including other market participants such as independent power producers) may be created for technical topics that have significant impacts to other stakeholders.

# Business Practice Manuals

- BPM changes will be approved by the TRC.
- Public review and comment periods will continue, similar to the CAISO's current BPM review process today.
- However, as the ROWE Tariff and process have yet to be developed, we expect continued evolution of this framework consistent with ROWE's development of this process under their administration.

# Timeline: 2026

To allow for more collaboration with the goal of developing an Initial Proposal with broad support, the following schedule is proposed:



# Timeline: 2027

Dates are approximate; feedback from Initial ROWE Board may result in changes to timeline



# Summer/Fall Workshops

## September

- Workshop #12, September 10: Technical Design and Compliance
- Workshop #13, September 17: Updates on Governance, Technical Design, Transmission, Compliance, and Data

**\*Comments on September workshops due 10/1**

The issue of how to address data will be included in workshops but the Work Group is still determining timing and where to best incorporate these discussions

# 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](mailto: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