**From:** Spear, Justin  
**Sent:** Tuesday, October 14, 2025 8:47 AM  
**Subject:** WAPA's WEQ/WLR Comments

Good morning,

WAPA appreciates the opportunity to comment on the proposed WLR business practice. WAPA is concerned that the proposed 5% curtailment threshold referenced in XXX-3.4 requires clarification to remove ambiguity regarding counterflow impacts on relief obligation. WAPA requests the team consider including an allowance for TDF of Negative Influence on a Constrained Facility or Constrained Flowgate on proposed transactions to be curtailed, as part of the evaluation and approval action process.  This would also impact the Reloading Implications based on Transmission Service levels as described in 2.1. Further, WAPA suggests the team consider updating the language in XXX-3.4 to state: “The curtailment threshold for the Western Interconnection shall be +0.05 (positive 5%) or greater on the constrained facility or constrained flowgate.”

WAPA also suggests that NAESB update the reference, as appropriate, throughout the document from BA to BAA (balancing authority area), when referring to the metered boundary area rather than the registered entity.

Respectfully,

**Justin B. Spear | Senior Power Operations Specialist**

Western Area Power Administration | RMR | Loveland, CO

