

## INTEGRATED RESOURCE PLAN (IRP)

Western Area Power Administration's (WAPA) customers must comply with the requirements of the Energy Planning and Management Program (EPAMP (10 CFR Part 905)) to meet the objectives of Section 114 of the Energy Policy Act of 1992 (EPAAct). A WAPA customer is any entity that purchases firm capacity with or without energy, from WAPA under a long-term firm power contract. Integrated resource planning allows customers to meet the objectives of Section 114 of EPAAct.

Integrated resource planning is a planning process for new energy resources that evaluates the full range of alternatives, including new generating capacity, power purchases, energy conservation and efficiency, renewable energy resources, district heating and cooling applications, and cogeneration, to provide reliable service to electric consumers. An IRP supports utility-developed goals and schedules. An IRP must treat demand and supply resources on a consistent and integrated basis. The plan must take into account necessary features for system operation, such as diversity, reliability, dispatchability, and other risk factors. The plan must take into account the ability to verify energy savings achieved through energy efficiency and the projected durability of such savings measured over time. (See 10 CFR § 905.11 (a)).

### **Who May Use This Form:**

Utilities that primarily provide retail electric service that have limited staff, limited resource options, and obtain a significant portion of its energy needs through purchase power contracts are eligible to use this form. Utilities using this form may generate a limited amount of energy if the generating resources are primarily used as back up resources, to support maintenance and outages, or during periods of peak demand.

### **Completing This Form:**

To meet the Integrated Resource Planning reporting requirement, complete this form in electronic format in its entirety. Unaddressed items will be deemed incomplete and the IRP may not be eligible for approval. All of the data fields in this form automatically expand. Additional information may be attached to and submitted with this report. WAPA reserves the right to require supporting back-up materials or data used to develop this report. If there is any conflict between this form and the requirements defined in EPAMP, the requirements in EPAMP shall prevail.

## EPAMP Overview

The Energy Planning and Management Program (EPAMP) is defined in the Code of Federal Regulations in Title 10, Part 905 (10 CFR 905). The purposes of EPAMP are to meet the objectives of the Energy Policy Act of 1992 (EPAAct) while supporting integrated resource planning; demand-side management, including energy efficiency, conservation, and load management; and the use of renewable energy.

EPAMP was initially published in the Federal Register at 60 FR 54714 on October 20, 1995, and revised in 65 FR 16795 on March 30, 2000, and 73 FR 35062 on June 20, 2008. 10 CFR § 905.11 defines what must be included in an IRP.

WAPA's Energy Services Web site

(<https://www.wapa.gov/EnergyServices/Pages/energy-services.aspx>) provides extensive information on integrated resource planning and reporting requirements. If you have questions or require assistance in preparing your IPR, contact your WAPA regional Energy Services representative.

## IRP Content

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# INTEGRATED RESOURCE PLAN (IRP) 5-Year Plan

<b>Customer Name:</b>

<b>IRP History:</b> Check one as applicable.	
	<b>This is the submitter's first IRP submittal.</b>
<input checked="" type="checkbox"/>	<b>This submittal is an update/revision to a previously submitted IRP.</b>

<b>Reporting Dates:</b>	
<b>IRP Due Date:</b>	07/01/2025
<b>Annual Progress Report Due Date:</b>	07/01

<b>Customer Contact Information:</b> Provide contact information for your organization. The contact person should be able to answer questions concerning the IRP.	
<b>Customer Name:</b>	City of Gillette
<b>Address:</b>	611 N Exchange Ave
<b>City, State, Zip:</b>	Gillette, Wyoming, 82716
<b>Contact Person:</b>	David Freeman
<b>Title:</b>	Electrical Engineer
<b>Phone Number:</b>	307-686-5276
<b>E-Mail Address:</b>	<a href="mailto:Davidf@gillettewy.gov">Davidf@gillettewy.gov</a>
<b>Website:</b>	Gillettewy.gov

<b>Type of Customer:</b> Check one as applicable.	
<input checked="" type="checkbox"/>	<b>Municipal Utility</b>
<input type="checkbox"/>	<b>Electric Cooperative</b>
<input type="checkbox"/>	<b>Federal Entity</b>
<input type="checkbox"/>	<b>State Entity</b>
<input type="checkbox"/>	<b>Tribal</b>
<input type="checkbox"/>	<b>Irrigation District</b>
<input type="checkbox"/>	<b>Water District</b>
<input type="checkbox"/>	<b>Other (Specify):</b>

**SECTION 1****UTILITY/CUSTOMER OVERVIEW****Customer Profile:**

Enter the following data for the most recently completed annual reporting period. Data may be available on form EIA-861, which you submit to the U.S. Energy Information Administration (EIA).

<b>Reporting Period</b>	
Reporting Period Start Date (mm/dd/yyyy)	01/01/2024
Reporting Period End Date (mm/dd/yyyy)	12/31/2024
<b>Energy Sales &amp; Usage</b>	
Energy sales to Ultimate End Customers (MWh)	338,383
Energy sales for Resale (MWh)	0
Energy Furnished Without Charge (MWh)	1,916
Energy Consumed by Respondent Without Charge (MWh)	0
Total Energy Losses (MWh entered as positive number)	13,490
Total Energy Usage (sum of previous 5 lines in MWh)	353,789
<b>Peak Demand (Reporting Period)</b>	
Highest Hourly Summer (Jun. – Sept.) Peak Demand (MW)	79.1
Highest Hourly Winter (Dec. – Mar.) Peak Demand (MW)	70.2
Date of Highest Hourly Peak Demand (mm/dd/yyyy)	07/24/2024
Hour of Highest Hourly Peak Demand (hh AM/PM)	08 AM
<b>Peak Demand (Historical)</b>	
All-Time Highest Hourly System Peak Demand (MW)	79.64
Date of All-Time Hourly System Peak Demand (mm/dd/yyyy)	07/18/2022
Hour of All-Time Hourly Peak System Demand (hh AM/PM)	05 PM
<b>Number of Customers/Meters (Year End of Reporting Period)</b>	
Number of Residential Customers	14085
Number of Commercial Customers	2229
Number of Industrial Customers	537
Other (Specify):	
Other (Specify):	
Other (Specify):	
Other (Specify):	
Other (Specify):	

**Customer Service Overview:**

Describe your customer service territory and the services provided. Include geographic area, customer mix, key customer and significant loads, peak demand drivers, competitive situation, and other significant or unique aspects of the customer and/or service territory. Provide a brief summary of the key trends & challenges impacting future resource needs including population changes, customer growth/losses, and industrial developments.

The City of Gillette (“the City”) is a municipal utility providing electric services to the retail customers located in the City of Gillette, Wyoming. With an estimated population of 33,846, Gillette is one of the more populated areas of the state. Within the area of approximately 23 square miles, the City serves a mix of residential, commercial, and industrial electric customers in addition to City owned facilities that are located outside of City limits.

The primary industries in the surrounding areas are primarily coal and oil production, with the City’s interaction with these industries to be providing service to the supporting commercial and residential sectors. This leads to a significant portion of the City’s load base to be driven by residential heating and cooling loads where the peaks are seen in hottest days of summer and the coldest days in winter respectively.

With the uncertainty in these primary sectors looking forward in the future, the City is expecting neither any substantial growth or losses in either customer load or in industrial development.

### Electricity Utility Staff & Resources:

Summarize the number of full-time equivalent employees by primary functions such as power production, distribution, and administration. Describe any resource planning limitations, including economic, managerial, and/or resource capabilities.

The City of Gillette has the following breakdown of employees:

- 1) Line crews. 12 Linemen and 1 Meter tech split among 3 crews, their primary duties are maintaining and construction of upgrades to the distribution and transmission system.
- 2) Electric designers. 2 Electric designers with the primary duties of updating and administrating City distribution mapping, easements used by City of Gillette Electrical, tracking environmental regulations pertaining to distribution equipment, and involved in planning of new developments among other duties.
- 3) Project Manager. 1 Project manager who designs, oversees, and records City and Developer driven projects.
- 4) Engineering Staff. 2 Engineers who act in support to other electrical staff, administer the City fiber optic network, and coordinate with Black Hills Energy on system energy supply among other duties.
- 5) Administration. 1 Electric Superintendent who is administers both long and short-term planning on the distribution and transmission system among other duties. 1 Utilities Director who oversees system energy supply among other duties.

As mentioned, the City of Gillette partners with Black Hills Energy through bilateral agreements to supply the City with its energy supply requirements, forecast information, and generation resource administration.

As can be seen in the breakdown, the major limitation the City has in planning limitations is in staff time. Each category of staff has a variety of duties which, while allowing for unique and valuable insights into the planning process, does not allow for extreme specialization. As such, any goals set within resource planning must be weighed against multiple sets of priorities.

### Historical Energy Use:

Enter the peak system demand and total annual energy use for the preceding ten (10) reporting years. For total energy, include retail sales, energy consumed or provided without charge, and system losses.

Reporting Year	Peak Demand (MW)	Total Energy (MWh)
2014	70.95	335,277
2015	72.14	339,623
2016	77.67	338,796
2017	77.88	338,641

<b>2018</b>	74.00	340,674
<b>2019</b>	69.00	342,525
<b>2020</b>	71.67	332,611
<b>2021</b>	71.62	339,855
<b>2022</b>	79.64	352,153
<b>2023</b>	78.75	349,091

## SECTION 2 | FUTURE ENERGY SERVICES PROJECTIONS

### Load Forecast:

Provide a load forecast summary for the next ten (10) years; **and** provide a narrative statement describing how the load forecast was developed. Discuss any expected future growth. If applicable, you may attach a load forecast study and briefly summarize the results in this section. (See 10 CFR § 905.11 (b) (5)).

Load Forecast:

Reporting Year	Peak Demand (MW)	Total Energy (MWh)
2025	75.9	369,243
2026	77.0	374,514
2027	78.1	379,779
2028	79.2	379,584
2029	80.3	384,215
2030	81.4	389,321
2031	82.5	394,337
2032	83.6	399,274
2033	84.8	404,254
2034	85.9	409,382

Narrative Statement:

Black Hills Energy prepares an energy and peak demand forecast on an annual basis on behalf of the City. The purpose of this forecast is the basis for conducting resource planning studies, transmission reservation planning, and other related planning activities. The forecasting methodology is based on a time series methodology over 25-years of monthly metered consumption data. The City's most recent forecast, conducted in January 2025, projects average annual peak demand and energy growth of 1.19 percent for the next 10 years.

## SECTION 3

## EXISTING SUPPLY-SIDE RESOURCES

### Existing Supply-Side Resource Summary:

Provide a general summary of your existing supply-side resources including conventional resources, renewable generation, and purchase power contracts (including Western Area Power Administration contracts). Describe the general operation of these resources and any issues, challenges, or expected changes to these resources in the next five (5) years. (See 10 CFR § 905.11 (b) (1)).

The City's supply-side resources consist of five primary resources.

#### 1. WyGen III Facility

In 2010 the City acquired a 23 percent ownership interest in the 100 MW Wygen III plant. Wygen III is an efficient mine-mouth coal power plant located at the Wyodak Energy Complex, near Gillette, Wyoming. Wygen III began commercial operation on April 1, 2010 and employs state-of-the-art emissions control technology, including mercury emissions reduction. It also features air-cooled steam condensing. The ownership interest provides the City with approximately 23 MW of capacity for the life of the plant.

#### 2. Combustion Turbine No. 2

In 2014 the City acquired a 40 MW simple-cycle gas-fired combustion turbine for meeting its peaking requirements. The unit, referred to as CT2, entered commercial operation in 2009 and is also located at the Wyodak Energy Complex. The city purchased the plant from Black Hills Electric Generation, LLC ("BHEG"). During the acquisition of CT2, the City entered into an agreement with BHEG for the purchase of economy energy. While not attributed to any one resource, the agreement allows the City to take advantage of non-firm energy that is priced lower than the cost of producing energy from CT2.

#### 3. Purchase Power Agreement (PPA)

In 2019 the City entered a PPA with Black Hills Wyoming to purchase 5 MW from Wygen I. This coal fired plant is located at the Wyodak Energy Complex east of Gillette. The City started receiving energy from this agreement in January 2023.

#### 4. Western Area Power Administration Loveland Area Projects

The City purchases firm capacity and energy under long-term contract from Western. The Agreement provides for the continued delivery of 3-4 MW purchase of power from Western Loveland Area Projects.

#### 5. Peaking Energy Contract

This agreement provides the remainder of the capacity and energy required for the city of Gillette.

#### 6. City of Gillette Net Metering Program

While there is a small amount of net metering generation within the City (as listed in the existing power purchase resources), the overall amount of capacity and slow rate adoption means net metering is typically not considered in any resource planning.

**Existing Generation Resources:**

List your current supply-side resources, including conventional resources and renewable generation. If you do not own any generating resources, insert N/A in the first row. Insert additional rows as needed.

<b>Resource Description</b> (Identify resources as base load, intermediate, or peaking)	<b>Fuel Source</b>	<b>Rated Capacity (MW)</b>	<b>In-Service Date (Year)</b>	<b>Estimated Expiration/Retirement Date (Year)</b>
WYGEN III 23% Share	Coal	23	2010	-
Combustion Turbine 2	Natural Gas	40	2009	-

**Existing Purchase Power Resources:**

List your current purchase power resources. Define whether the contract provides firm service, non-firm service, all requirements or another type of service. Include Western Area Power Administration resources. If applicable, include a summary of resources that are under a net metering program. Insert additional rows as needed.

<b>Resource Description</b>	<b>Fuel Source</b> (If applicable)	<b>Contracted Demand (MW)</b>	<b>Type of Service</b> (Firm, Non-firm, Requirements, Other)	<b>Expiration Date (Year)</b>
WYGEN I PPA	Coal	5	Firm	2042
Western Area Power Administration Loveland Area Projects	Hydro	2-4	Firm	2054
Net Metering Distributed Generation	Solar	0.316		N/A
Peaking	System Mix		Requirements	-

**SECTION 4****EXISTING DEMAND-SIDE RESOURCES**

Demand-side programs alter a customer's use pattern and include energy conservation, energy efficiency, load control/management, education, and distribution system upgrades that result in an improved combination of energy services to the customer and the ultimate consumer.

**Existing Demand-Side Resources:**

List your current demand-side programs, including energy conservation, energy efficiency, load control/management, education, or maintenance plans, or system upgrades. Programs may impact the utility distribution system, municipally owned facilities, and/or end-user energy consumption. Refer to Section 9 of this form for a list of example programs. Insert additional rows as needed.

*(See 10 CFR § 905.11 (b) (1)).*

<b>Program Description</b>	<b>Estimated Program Savings (MW and/or MWh if known)</b> (Include annual impact and impact over the life of the program if known.)
N/A	N/A

## SECTION 5

# FUTURE RESOURCE REQUIREMENTS AND RESOURCE OPTIONS

### **Balance of Loads and Resources (Future Resource Requirements):**

Provide a narrative statement that summarizes the new resources required to provide retail consumers with adequate and reliable electric service during the 5-year resource planning period. Identify any federal or state regulations that may impact your future resource requirements. If you are not experiencing or anticipating load growth and a need for new resources, describe your current procedure to periodically evaluate the possible future need for new resources.

With the City being a small utility not experiencing or expecting major growth, the objective is to evaluate load growth and change while minimizing devoted staff time. To accomplish this, at the end of each season City staff record the seasonal peak, total energy requirement, and daily extrema of load.

These values are then compared to historical values on the seasonal basis to determine what the growth from previous years have been, as well as comparing the seasonal peak vs the daily extrema to determine whether seasonal extreme values are due to interconnected load factors or driven by major events.

This measurement strategy accomplishes the City's goal of staying aware of the potential need for resources balanced with staff time in several ways:

1) Frequency of evaluation

Since the evaluation is happening twice a year, any serious deviation from trends seen in historical and forecast values can be caught early and accounted for in energy supply planning.

2) Normalization to seasonal effects

As can be seen in graph 5.1 below, the City of Gillette is a summer peaking utility with the winter capacity requirements being lower than the summer and system peaks. Conducting evaluations on a bi-annual basis allows for that difference to be recorded and compared to data that is of similar nature. It also allows for possible solutions to future energy supply needs to be more custom-tailored to the season of applicability.

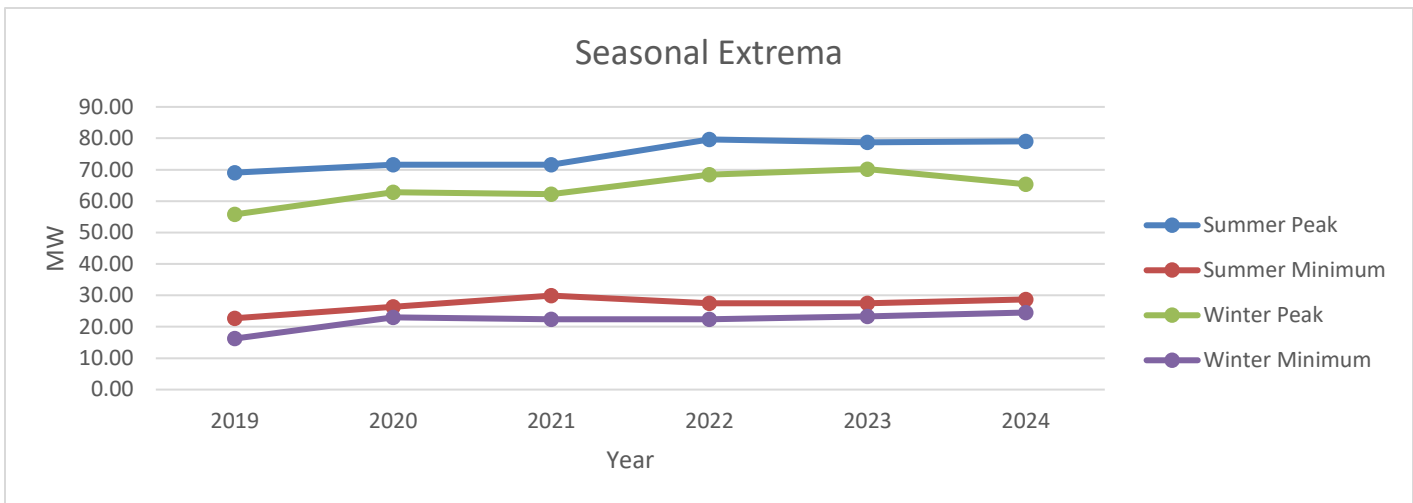
3) Snapshot of daily energy requirements.

Aggregating data on a daily time stamp as well as a seasonal one allows for the recording of trending data that would be missed if data was just aggregated on an annual or seasonal basis. This becomes especially important when one considers that many demand management strategies would be effective on shifting or conserving load on the daily time horizon instead of the annual or seasonal one. An example of the value of aggregation of daily data can be seen in graph 5.2 below in comparison to graph 5.1. While the summer seasonal peak tends to be much higher than the winter one, the daily peaks are much closer. Additionally, observing that there is a larger spread between the summer extrema than winter shows that demand management strategies may be more effective during the summer months than the winter. This is just

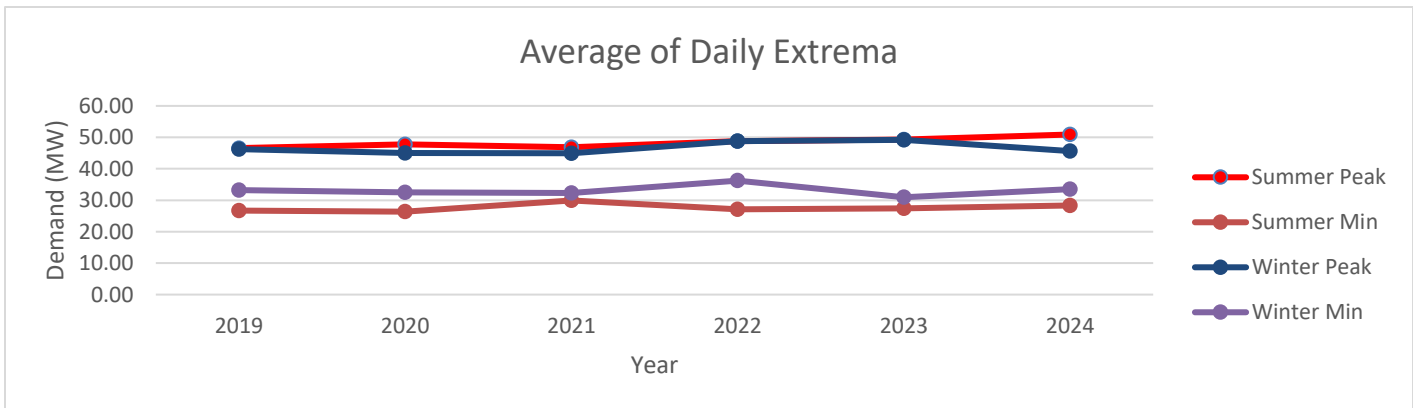
an example of the value in the City's plan on evaluating daily data as well as seasonal data for the purpose of energy supply planning.

- 4) Conservation of staff time.  
With the City of Gillette being a small utility with planning staff also taking on other duties, smaller more frequent studies allow for prioritization within numerous other tasks.

This measurement strategy is proving to be robust and currently is reinforcing the previously identified result that no current supply planning programs on the supply or demand side is needed currently.



Graph 5.1: The historical seasonal extrema values for the City of Gillette



Graph 5.2: The historical daily extrema values for the City of Gillette, broken down by season

**Identification of Resource Options**

Identification and comparison of resource options is an assessment and comparison of existing and future supply-side and demand-side resources available to a customer based upon size, type, resource needs, geographic area, and competitive situation. Resource options evaluated must be identified. The options evaluated should related to the resource situation unique to each WAPA customer as determined by profile data such as service area, geographical characteristics, customer mix, historical loads, projected growth, existing system data, rates, financial information, and load forecast. (See 10 CFR § 905.11 (b) (1)).

Considerations that may be used to develop potential resource options include cost, market potential, consumer preferences, environmental impacts, demand or energy impacts, implementation issues, revenue impacts, and commercial availability. (See 10 CFR § 905.11 (b) (1) (iii)).

**Future Supply-side Options:**

List the future supply-side resource options that were considered and evaluated, including, but not limited to conventional generation, renewable generation, and power purchase contracts. Include a brief discussion on the applicability of each option for further consideration or implementation based on your system requirements and capabilities. If new resources are not required during the 5-year resource planning period, please indicate that below. Insert additional rows as needed. (See 10 CFR § 905.11 (b) (1)).

<b>Supply-Side Option</b>	<b>Applicability for Implementation or Further Consideration</b>
N/A	N/A

**Future Demand-side Options:**

List the future demand-side resource options that were considered and evaluated. Demand-side programs alter a customer's use pattern and include energy conservation, energy efficiency, load control/management, education, and distribution system upgrades that result in an improved combination of energy services to the customer and the ultimate consumer. Include a brief discussion on the applicability of each option for further consideration or implementation based on your system requirements and capabilities. Insert additional rows as needed. (See 10 CFR § 905.11 (b) (2)).

<b>Demand-Side Option</b>	<b>Applicability for Implementation or Further Consideration</b>
Peak Shaving	While current data is showing that no steps are needed, the wide gap between daily system peaks and minimums shows that there are potential for peak shaving programs to be effective if future loads grow larger than forecast amounts.  Continued evaluation of energy supply requirements will show if this demand side option becomes necessary.

**Resource Options Chosen:**

Describe the resource options that were chosen for implementation or further consideration and clearly demonstrate that decisions were based on a reasonable analysis of the options. Resource decisions may strike a balance among applicable evaluation factors such as cost, market potential, customer preferences, environmental impacts, demand or energy impacts, implementation issues or constraints, revenue impacts, and commercial availability. (See 10 CFR § 905.11 (b) (1) (iv)).

At this time, neither historical nor forecast data suggest that new supply-side resource options are necessary within the next five years to ten years. As such, the City is currently not evaluating any new resource options.

**Environmental Effects:**

To the extent practical, WAPA customers must minimize environmental effects of new resource acquisitions and document these efforts. IRPs must include a qualitative analysis of environmental impacts in summary format. Describe the efforts taken to minimize adverse environmental effects of new resource acquisitions. Describe how your planning process accounts for environmental effects. Include a discussion of policies you conform with or adhere to, and resource decisions that have minimized or will minimize environmental impacts by you and/or your wholesale electricity supplier(s). WAPA customers are neither precluded from nor required to include a qualitative analysis of environmental externalities as part of the IRP process. If you choose to include a quantitative analysis, in addition to the summary below, please attach separately. (See 10 CFR § 905.11 (b) (3)).

The City complies with all applicable provisions of the state and federal environmental regulations at its existing power plants and substation facilities. The City has considered impacts on the environment when developing this IRP. Any new power supply resources developed by the City as part of this IRP will comply with the Clean Air Act and Clean Water Act and will include emissions control technologies as may be required to help reduce the impact of the emissions on the environment.

The City has also implemented conservation programs and measures at City owned facilities and water supply locations. These conservation programs are designed to reduce energy usage and associated environmental impacts.

**Public Participation:**

Customers must provide ample opportunity for full public participation in preparing and developing an IRP. Describe the public involvement activities, including how information was gathered from the public, how public concerns were identified, how information was shared with the public, and how your organization responded to the public's comments. (See 10 CFR § 905.11 (b) (4)).

As described below, the City will encourage and welcome public participation, developed a process for collecting the comments of its stakeholders, and has incorporate public comments into the plan as appropriate. Provided below is a description of the public participation process as implemented by the City.

- 1.1. On June 16, 2025, the City will post an announcement on its public website providing notice that the draft IRP would be presented to the public for stakeholder comment. The notice will include the date, time, and location of the public presentation, and will include instructions for providing written comments prior to the public participation process. The website will also include access to the draft IRP document.
- 1.2. The notice will be displayed in the Gillette News Record prior to the City Council meeting on July 1, 2025
- 1.3. During the City Council meeting on July 1, 2025, the public hearing will be conducted and a Resolution adopting the IRP is planned to be approved by the Governing Body. The Resolution and meeting minutes will be included as an Exhibit in the final IRP
- 1.4. The City video will record the City Council meeting to accurately capture and collect any comments provided by the public. The video recording will be able to be accessed via the City's Gillette Public Access website.

## SECTION 8

## ACTION PLAN & MEASUREMENT STRATEGIES

### **Action Plan Summary:**

Describe the high-level goals and objectives that are expected to be met by the implementation of this resource plan within the 5-year resource planning period. Include longer term objectives and associated time period(s) if applicable. (See 10 CFR § 905.11 (b) (2)) and (See 10 CFR § 905.11 (b) (6)).

In light of the small amount of growth that the City has historically seen, the primary goals of this resource plan are to monitor the City's energy requirements and evaluate possible future needs of energy supply acquisition or demand management.

Comprehensive monitoring of the City's requirements is accomplished by setting and continuing a program of monitoring seasonally the energy and demand City's requirements. The frequency of this measurement allows for trendlines to show in seasonally corrected data, and the early identification of any change in the expected growth of City Requirements.

**Specific Actions:**

List specific actions you will take to implement your plan over the 5-year planning horizon.

**New Supply-Side Resource Acquisitions:**

List new resource options your organization is planning to implement, investigate, or pursue in the next five years. Include conventional generation, renewable resources, net metering programs, and purchase power contracts. Include key milestones such as the issuing an RFP, executing a contract, or completing a study. (See 10 CFR § 905.11 (b) (2)).

<b>Proposed New Resource</b>	<b>Begin Date</b>	<b>Est. New Capacity (MW)</b>	<b>Milestones to evaluate progress and/or accomplishments</b>
N/A	N/A	N/A	N/A

### New Demand-Side Programs & Energy Consumption Improvements:

List energy efficiency, energy conservation, and load management programs your organization is planning to implement or evaluate in the next five years. Include key milestones to evaluate the progress of each program. Insert additional rows as needed. (See 10 CFR § 905.11 (b) (2)).

Example programs could include:

- Education programs & communications
- Energy efficient lighting upgrades
- Energy audits
- Weatherization & Insulation
- Window/doors upgrades
- Boiler, furnace or air conditioning retrofits
- Programmable thermostats
- Equipment inspection programs
- Use of infrared heat detection equipment for maintenance
- Tree-trimming/brush clearing programs
- Electric motor replacements
- Upgrading distribution line/substation equipment
- Power factor improvement
- Loan arrangements for energy efficiency upgrades
- Rebate programs for energy efficient equipment
- Key account programs
- Load management programs
- Demand control equipment
- Rate designs
- Smart meters (Time-of-Use Meters)

Proposed Items	Begin Date	Est. kW capacity savings per year	Est. kWh savings per year	Milestones to evaluate progress and/or accomplishments
N/A	N/A	N/A	N/A	N/A

**Measurement Strategies:**

Describe your plan to evaluate and measure the actions and options identified in the IRP to determine if the IRP's objectives are being met. The plan must identify and include a baseline from which you will measure the IRP implementation's benefits. (See 10 CFR § 905.11 (b) (6)).

As no new actions or options currently need to be implemented, no measurement of the effectiveness of those actions will be conducted.

**SECTION 9****SIGNATURES AND APPROVAL****IRP Approval:**

Indicate that all of the IRP requirements have been met by having the responsible official sign below; **and** provide documentation that the IRP has been approved by the appropriate governing body (i.e. provide a copy of the minutes that document an approval resolution). (See 10 CFR § 905.11 (b) (4)).

(Name – Print or type)	(Title)
(Signature)	(Date)

**Other Information:**

(Provide/attach additional information if necessary)

**IRP Posting Requirement:**

10 CFR § 905.23 of the EPAMP as amended effective July 21, 2008, facilitates public review of customers' approved IRPs by requiring that a customer's IRP be posted on its publicly available Web site or on WAPA's Web site. Please check the method in which you will comply with this requirement within thirty (30) days of receiving notification the IRP has been approved:

<input checked="" type="checkbox"/>	Customer will post the approved IRP on its publicly available website and send the URL to WAPA.
<input type="checkbox"/>	Customer would like WAPA to post the approved IRP on WAPA's website.