

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 (EPAct). 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 EPAct.

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.

Submit the completed report with a cover letter to:

Western Area Power Administration

Attention: Georganne Myers

P.O. Box 35800

Billings, MT 59107-5800

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>) provides extensive information on integrated resource planning and reporting requirements. If you have questions or require assistance in preparing your IRP, contact your WAPA regional Energy Services representative.

IRP Content

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INTEGRATED RESOURCE PLAN (IRP) 5-Year Plan

Customer Name:
Northeast Power

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

Reporting Dates:	
IRP Due Date:	January 1, 2019
Annual Progress Report Due Date:	January 1, 2020

Customer Contact Information: Provide contact information for your organization. The contact person should be able to answer questions concerning the IRP.	
Customer Name:	Northeast Power
Address:	1410 W. 7 th Street
City, State, Zip:	Wayne, NE 68787
Contact Person:	Mandy Backer
Title:	Controller
Phone Number:	402-375-1360
E-Mail Address:	mandyb@northeastpow.com
Website:	www.northeastpow.com

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

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).

Reporting Period	
Reporting Period Start Date (mm/dd/yyyy)	01/01/2017
Reporting Period End Date (mm/dd/yyyy)	12/31/2022
Energy Sales & Usage	
Energy sales to Ultimate End Customers (MWh)	281358
Energy sales for Resale (MWh)	6065
Energy Furnished Without Charge (MWh)	
Energy Consumed by Respondent Without Charge (MWh)	
Total Energy Losses (MWh entered as positive number)	17549
Total Energy Usage (sum of previous 5 lines in MWh)	304972
Peak Demand (Reporting Period)	
Highest Hourly Summer (Jun. – Sept.) Peak Demand (MW)	71.845
Highest Hourly Winter (Dec. – Mar.) Peak Demand (MW)	52.944
Date of Highest Hourly Peak Demand (mm/dd/yyyy)	07/19/2017
Hour of Highest Hourly Peak Demand (hh AM/PM)	09:00 AM
Peak Demand (Historical)	
All-Time Highest Hourly System Peak Demand (MW)	71.845
Date of All-Time Hourly System Peak Demand (mm/dd/yyyy)	07/19/2017
Hour of All-Time Hourly Peak System Demand (hh AM/PM)	09:00 AM
Number of Customers/Meters (Year End of Reporting Period)	
Number of Residential Customers	6732
Number of Commercial Customers	649
Number of Industrial Customers	46
Other (Specify): Irrigation	683
Other (Specify): Public	244
Other (Specify): Resale	2
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 Northeast Nebraska Public Power District (Northeast Power) was formed in 1998 as a result of the consolidation of two smaller power districts: The Wayne County Public Power District and the Northeast Nebraska Rural Public Power District. At the time, the Boards of Directors felt a consolidation would be an effective way to hold down overhead costs, improve efficiency and service and ultimately keep retail electric rates low.

In 2000, Northeast Power assumed responsibility for serving 14 Villages and Towns with electric service. The Villages and Towns had previously been served by the Nebraska Public Power District, the only statewide electric company in Nebraska.

Northeast Power serves approximately 8,500 retail electric customers in Pierce, Thurston, Wayne, Dixon and Dakota Counties in Nebraska. Northeast Power operates about 3,000 miles of electric lines and over 100 miles of high voltage transmission lines. Power is delivered to the Cities of Wayne, Wakefield, Winside and Emerson over Northeast Power transmission lines from the Southwest Power Pool.

Our Purpose: "Northeast Power is dedicated to providing reliable and competitively priced electricity to our consumers while maintaining a sound financial position and effective, fair and consistent service."

Northeast serves residential, small and large commercial loads. Northeast services approximately 600 irrigation services and several grain bin drying services.

Northeast has experienced little load growth over the past ten years and anticipates minimal growth in the future. Future growth could be impacted by the siting of large industry within Northeast's service territory.

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.

Northeast has 25 full-time employees including the General Manager that report to an 8-member Board of Directors. 12 Linemen function under direction of the Operations Manager to construct and maintain the District's 3000 miles of line across 5 Nebraska counties. Assisting them is a Warehouseman, Staking Technician and Purchasing Agent. Finance and administrative customer services including billing are handled by a Controller, an Accountant, and 5 full-time Billing Clerks. All Information Technology and Systems are managed by one Technical Systems Manager.

Northeast does not have an electrical engineer on staff to develop and direct improvements. They rely on outside consultant support for the development of financial forecasts and capital plans.

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)
2007	49.516	240332
2008	50.387	281910
2009	49.895	281669
2010	48.594	278548
2011	45.732	274353
2012	49.814	288152
2013	62.474	293030
2014	64.361	283518
2015	57.603	272789
2016	67.073	291162
2017	71.845	304972

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)
2018	62	304972
2019	62	304972
2020	63	308022
2021	63	308022
2022	64	311102
2023	64	311102
2024	65	314213
2025	65	314213
2026	66	317355
2027	66	317355
2028	67	320529

Narrative Statement:

In cooperation with Big Rivers Electric Cooperative (BREC), Northeast annually evaluates its load and makes appropriate filing with the SPP. Total existing customer load growth is projected to be about 1 percent per year over the 2018-2028 forecast period, in line with historical growth.

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)).

Northeast has developed a diverse portfolio of contracted supply resources that is designed to stabilize electric rates through Market-priced contacts, and indexed pricing for price stability and savings. These contract supply portfolios include purchases from a variety of resources under short, mid, and long-term power purchases agreements (“PPAs”). Northeast’s resources also include long term purchases from traditional utilities, market purchases, WAPA and renewable PPA’s, and the possibility of renewable development of resources within the Northeast’s service area. Northeast has recently begun the termination process of its all-requirements services contract with NPPD and has begun to enter into several power purchase agreements while continuing to explore other power supply options. Provided below is a summary of Northeast’s existing resources.

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.

Resource Description (Identify resources as base load, intermediate, or peaking)	Fuel Source	Rated Capacity (MW)	In-Service Date (Year)	Estimated Expiration/Retirement Date (Year)
N/A				

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.

Resource Description	Fuel Source (If applicable)	Contracted Demand (MW)	Type of Service (Firm, Non-firm, Requirements, Other)	Expiration Date (Year)
NPPD Partial Requirements Contract	Nuclear & Coal	Capacity value decreases through contract termination in 2021	Full-Requirements (limit & reduce provisions)	2021
BREC Market Based Contract	Natural Gas capacity and market supplied energy	Capacity value increases through contract termination in 2021	Partial & Full Requirements	2026
NextEra Renewables	Wind	15 MW	Non-Firm	2042
WAPA	Hyrdo	1.95 MW	Firm	2050

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)).

Program Description	Estimated Program Savings (MW and/or MWh if known) (Include annual impact and impact over the life of the program if known.)
Conversion of rental lights to LED	Unknown
Irrigation Time of Use Rate	Unknown

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.

The possibility of load growth for Northeast would occur if a new industrial load locates within the Northeast service territory. These load changes would be reviewed with BREC and covered under the existing Northeast BREC partial and full requirements contract. BREC has the exclusive right to serve all power requirements of Northeast.

Northeast uses the following as a guideline for analyzing future resource needs:

Resource Diversity:

- Develop a portfolio of resources that includes a diverse mix of fuel and technology types.
- Evaluate a range of supply and demand resources.
- Include renewable resources in the portfolio if they offer specific value to Northeast.

Minimize Costs:

- Evaluate and select resources that will reduce and stabilize retail rates for customers.
- Develop a portfolio of resources that include a diverse mix of fuel and technology types.
- Obtain resources through a competitive procurement process that provides for price discovery and flexibility in pricing options.

Clean & Renewable Resources:

- Include competitively priced clean or renewable resources in the portfolio that will minimize environmental impacts.
- Consider renewable resources developed locally (within Nebraska) that may offer value to Northeast.

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)).

Supply-Side Option	Applicability for Implementation or Further Consideration
BREC	Northeast will review options for extending existing contract
NextEra	Existing contract in place
WAPA	Existing contract in place
Wind & Solar	Behind the meter distributed generation options reviewed as customers request

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)).

Demand-Side Option	Applicability for Implementation or Further Consideration
Peak Shaving	Northeast will continue to use time of use rates for irrigation load control to provide best value to the customer
Energy Conservation and Efficiency	Northeast can promote customer awareness of their electric usage and encourage efficiency through bill messages and social media postings.

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)).

The supply-side resources Northeast has in place will be sufficient to cover the Northeast load for the next 5 years. Northeast will work with outside engineering consultants to develop a plan to maintain the distribution and transmission facilities to ensure reliability and efficiency.

Northeast is also implementing a modern Automated Metering system and will have increased data in the future that will allow for improved analysis and decision making in the future.

SECTION 6**ENVIRONMENTAL EFFECTS****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)).

Northeast is working toward creating a diverse portfolio of power resources. Northeast has made arrangements to take its WAPA allocation directly. Additionally, Northeast has recently entered into a long-term wind contract with NextEra energy.

Northeast also has a net-metering policy and has several customers with behind the meter-wind or solar.

Northeast will continue to upgrade and maintain the distribution and transmission system for reliability and efficiency.

Northeast will educate customers on their usage patterns and encourage customers to conserve energy when possible.

All of the above actions help to minimize the impact on the environment.

SECTION 7**PUBLIC PARTICIPATION****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)).

Northeast monthly Board meetings are always open to the public, and public participation is encouraged. Review of the Integrated Resource Plan has been placed as an agenda item for public comment.

Northeast has not received any feedback in regard to the IRP.

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)).

The long-term goal of Northeast is to provide safe, reliable energy at the lowest possible cost while being a good steward of natural resources and the environment.

To accomplish this goal, Northeast will focus on:

Resource Diversity:

- Develop a portfolio of resources that includes a diverse mix of fuel and technology types.
- Evaluate a range of supply and demand resources.
- Include renewable resources in the portfolio if they offer specific value to Northeast.

This objective will be measured based on the diversity of the fuel supply mix; this objective will be met when the Northeast's portfolio is being sourced by resources relying on a range of fuel types.

Cost Minimization:

- Evaluate and select resources that will reduce and stabilize retail rates for customers.
- Develop a portfolio of resources that include a diverse mix of fuel and technology types.
- Obtain resources through a competitive procurement process that provides for price discovery and flexibility in pricing options

This objective will be measured based on retail energy prices; this objective will be met when the Northeast's retail energy price is lower than it was in 2016.

Clean & Renewable Resources:

- Include competitively priced clean or renewable resources in the portfolio that will minimize environmental impacts.
- Consider renewable resources developed locally (within Nebraska) that may offer value to Northeast.

This objective will be measured based on Northeast's energy purchases from clean or renewable resources; this objective will be met when Northeast's portfolio contains clean or renewable resources in an amount equal to the state average.

Public Outreach:

- Gain an understanding of the resource preferences of Northeast's customers and incorporate as applicable.

This objective will be measured based on the opportunities the customers have to provide input to the planning process; this objective will be met when Northeast incorporates the feedback received from its customers.

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)).

Proposed New Resource	Begin Date	Est. New Capacity (MW)	Milestones to evaluate progress and/or accomplishments
No new resources are needed. The purchase power contracts from NPPD, BREC, NextEra and WAPA provide combined capacity that is adequate to meet the forecasted peak demands.			

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
Energy efficient lighting upgrades	Ongoing	Unknown	Unknown	Northeast upgrades all rental lights to LED as repairs are needed
Use of infrared heat detection equipment	Ongoing	Unknown	Unknown	Northeast crews use infrared camera on sub equipment monthly
Tree-trimming	Ongoing	Unknown	Unknown	Northeast crews annually patrol lines and trim trees.
Electric Metering	2018	Unknown	Unknown	Installation of new AMI system will allow for improvements in rate-making and outage-management
Education Communication	Ongoing	Unknown	Unknown	Increased communications regarding energy efficiency will be posted on social media
Power Factor Improvement	2020	Unknown	Unknown	After the installation of AMI, Northeast will have the ability to monitor Power Factor by customer
Rate Designs	2019	Unknown	Unknown	New AMI metering will allow for demand driven rates in the future

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)).

Northeast's IRP has identified that there is not an immediate need for additional supply-side resources. Northeast's current power supply contracts with NPPD, BREC, NextEra and WAPA are sufficient for Northeast's projected load.

Longer-term action plans include analyzing the development and procurement of power supply options along with economically viable demand-side management programs.

Using more accurate load data from the newly implemented advanced metering system, Northeast will analyze the load of existing customers to develop and refine a more detailed methodology for forecasting Northeast's peak demand and energy requirements. The metering data will also be used in developing demand-based rates and rates that promote improved power factor.

2017 load and retail rates will be a baseline Northeast uses as a metric.

Northeast will annually review their plan and submit required updates to WAPA.

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:

	Customer will post the approved IRP on its publicly available website and send the URL to WAPA.
X	Customer would like WAPA to post the approved IRP on WAPA's website.

IRP Updates:

WAPA's customers must submit updated IRPs every five (5) years after WAPA's approval of the initial IRP.

IRP Annual Progress Reports:

WAPA's customers must submit IRP progress reports each year within thirty (30) days of the anniversary date of the approval of the currently applicable IRP. Annual progress reports can be submitted using WAPA's on-line reporting tool, which can be accessed at: <http://www.wapa.gov/FormsAuth/Login.aspx?ReturnUrl=/irpsubmit/irpsubmit.aspx>