



July 28, 2025

NewSun Energy

550 NW Franklin Ave., Suite 408

Bend, Oregon 97703

Subject: BPA Grid Access Transformation (GAT) Comments

To the Bonneville Power Administration (BPA) –

The region is facing a pivotal time. We cannot accept more destabilizing activities. We are in a period of necessity. One that requires the development of resources and transmission to meet the changing needs in the region.

NewSun Energy respectfully submits these comments to express significant concern regarding the pathway, initial positions, pace, scope, structure, and lack of analysis provided with BPAs' proposed GAT process. The current timeline is insufficient to fully evaluate the complex and far-reaching implications of the proposed reforms. Customers have not had enough time to review and discuss these proposals adequately. These changes affect not only the mechanics of transmission access but also the broader ability of the Pacific Northwest to develop critical energy infrastructure and meet its load service and decarbonization requirements.

We request that BPA adjust the agenda for the 7/29/25 meeting. The Agenda Review, Workshop format, and objective section are the most important conversations we need to have as a region. We request that this agenda item take up the first half of the day. We further request more customer-led presentations within the GAT process.

If the proposed changes being discussed so far are the path BPA is on, it will destroy existing precedent. It will inhibit investability in transmission and resource development in the region (this damages the existence of IPP and Marketing business cases). It will damage liquidity and create inequity in the market. It risks going as far as undermining open access and moving towards discriminatory practices, whereas BPA selects the winners and losers through business practice changes. Changes that need to be understood, analyzed holistically, and aligned with all the changes being discussed in multiple forums.

Moreover, the current design of the process risks introducing uncertainty into the regional transmission framework at a time when investment certainty is paramount. BPA must not alter foundational principles—such as rollover rights (which are crucial for long-term investments, resource development, and load service), deferral flexibility (which is crucial for contracting and cost management), pathway to LT Firm, especially from conditional products (which is needed for investing, compliance programs, system expansion, and reliability), and the integrity of previously processed Transmission Service Requests (TSRs). Without a thorough and inclusive stakeholder process, we fear a dangerous precedent is being created and implemented.

We understand the pressure and issues BPA has in processing their queues, but this process and subsequent impactful changes need time to be understood. There are a multitude of other tariff and business practice changes underway. We must ensure that the priority is getting this right and not sacrificing that goal for the goal of speed. We cannot implement policies and procedures that create a loss of confidence, instability, or development in the region. We cannot discriminate against existing entities that invest in the region under the existing set of rules. It's a dangerous precedent to set and doesn't solve the issues at hand.

The scale and ramifications of these proposed changes are of serious concern. The region and BPA, appropriately, took more time dealing with LGIA and the Data Exhibit process update reform. Yet, we are just now getting business practice updates for GI reform. This GAT process is multiple magnitudes larger and more impactful than those issues. We must consider them together in alignment because that is what creates a reliable, investable, and efficient region.

The region is currently dealing with many important and impactful decisions: BP-26 ROD, finalizing PoC, GI reform, CFS reform, WRAP/DAMKT implementation, normal operational needs, and it is summer vacation season. We urge BPA to slow down the process, hold detailed discussions on subsets of these issues, consider alternative means to study the queue, and not just look to clear the queue if that means sacrificing the long-term future of resource and transmission development in the region.

Transmission Reform & Queue Management

BPA's proposed reforms must reflect the scale and urgency of renewable energy integration. As demonstrated in Elaine Hart's study on queue congestion, the current queue size is a direct response to the region's decarbonization and electrification needs, not speculative behavior.

We strongly oppose the removal of rollover rights and deferral flexibility, which are essential for project financing and long-term planning. These mechanisms are particularly critical for clean energy developers navigating complex permitting, interconnection, and financing landscapes.

Furthermore, BPA must not retroactively alter or invalidate TSRs that have already undergone requests and are in the Transmission Service Evaluation Process (TSEP). These TSRs represent substantial investments and planning efforts, regardless of whether a confirmed offer has been issued or requests are still in the study process. This is another example of why this process needs to ensure enough time for people to engage with BPA effectively, so we can create a viable path to transmission and resource development in the region.

We must be very conscious and respectful of these proposed changes so that we do not unduly discriminate against those who have long been in the queue, waiting on BPA, and funding existing requests. Serious damage can occur if we alter the assumptions and expectations customers made to invest in the development the region desperately needs.

Forecasting, Planning, and Readiness

BPA must provide clear, detailed guidance on how Network Integration Transmission (NIT) forecasts and readiness criteria will be applied. This is especially important for Network Transmission (NT) customers experiencing trended load growth above 13 MW at a single Point of Delivery (POD), across multiple PODs, or at new Point of Receipt (POR) locations.

The proactive planning process must be transparent and inclusive of NT and PTP service. Readiness criteria must be objective, clearly defined, and inclusive of projects that are actively progressing through interconnection, funding, or market development stages. Both BPA products support load service, resource development, and market liquidity. The market needs options and liquidity, the ability to take power to load centers and market hubs, and entities willing to invest in the transmission system. BPA must consider the investments made to date and create a pathway to continue regional investment in our resources and grid.

Conditional Firm & Interim Service

BPA's approach to interim and conditional firm service must preserve flexibility and avoid penalizing projects that are awaiting grid upgrades or that have already participated in the TSEP process. All requests—whether paused during TSEP or submitted thereafter—must be evaluated transparently under the new framework, with clearly articulated criteria for inclusion. They must have a pathway to LT Firm Service because that is what the region requires for load service, resource development, to meet compliance programs obligations, to finance projects and transmission investments, and provide essential liquidity to the market.

New Point & CRC Eligibility

The New Point mechanism, developed by BPA, must remain a valid and accessible tool for demonstrating transmission needs and securing service. BPA has a unique opportunity to align its queue management processes with the region's resource development and liquidity requirements.

CRC eligibility criteria should be expanded to include, and not be limited to:

- Active generator interconnection (GI) agreements, negotiations, or study phases.
- Submission to Requests for Proposals (RFPs).
- Prior funding commitments (e.g., Preliminary Engineering Agreements, feasibility studies, EAs, and other forms of financial commitments).
- Willingness to pay Engineering, Procurement, and Construction (EPC) costs.
- Commencement of construction activities (e.g., site control, equipment procurement, groundwork).
- Active negotiations between counterparties.

- BPA must not use CRC reform as a vehicle to restrict generator access to the Mid-Columbia (MIDC) trading hub, which is vital for regional liquidity and renewable integration.

Timeline & Process Integrity

The proposed four-month timeline is inadequate to fully vet the implications of these sweeping reforms. BPA must engage in a more deliberate and inclusive stakeholder process to avoid unintended consequences that could destabilize the market or delay critical infrastructure development. Aspects such as customer presentations need a place in this process moving forward.

Policy & Market Impacts

The proposed removal of deferral rights, rollover rights, and backward-looking changes sets a dangerous precedent that could:

- Undermine project financing and investments.
- Reduce market competition and liquidity.
- Increase costs and reliability concerns for end-use loads.
- Result in the cancellation of viable projects.

BPA must ensure that its generator interconnection and transmission access processes are aligned to support diverse business models and uphold the principles of open access and non-discrimination. Now is the time to come together to facilitate the grid of the future.

Conclusion

The timing of this process creates a challenge for everyone in the region to adequately provide feedback and ensure we make appropriate changes. Many customers are dealing with the release of the BP-26 ROD, finalizing the PoC, understanding the connectivity of the multiple business practices and potential tariff changes being discussed, and balancing summer travel plans. All on top of normal operating activities.

We urge BPA to slow the Grid Access Transformation process and engage in a more comprehensive, transparent, and collaborative dialogue with stakeholders. The stakes are high: the region is in urgent need of new resource development and transmission investment. BPA must ensure that reforms are carefully calibrated to support—not hinder—the region's load service, liquidity, and clean energy transition.

Sincerely,

NewSun Energy Team