

August 15, 2025

NewSun Energy

550 NW Franklin Ave., Suite 408

Bend, Oregon 97703

RE: Formal Comments on BPA Grid Access Transformation (GAT) Process

Executive Summary – NewSun Energy Principles for BPA Grid Access Transformation

NewSun Energy appreciates the opportunity to participate in the Grid Access Transformation (GAT) process and offers the following principles and recommendations to guide BPA's policy development and implementation. These principles are intended to support a fair, transparent, and forward-looking transmission system that maintains open access and ensures long-term reliability and equity across all customer types.

Core Principles and Recommendations

1. Preserve Open Access

- BPA must maintain open access to its transmission system for all customer types, including IPPs, marketers, direct access providers, and load-serving entities (LSEs), regardless of generation ownership.

2. Tariff Compliance

- All proposed changes must align with the current BPA Tariff or initiate a formal Tariff proceeding to ensure legal and procedural integrity.

3. Forward-Looking Reform

- BPA should avoid retroactive changes. Reforms must be applied to the future state, where they can be appropriately managed and evaluated.

4. Certainty in Long-Term Firm Transmission

- Any changes must provide a clear and reliable path to securing long-term firm transmission service.

5. Roll-Over Rights

- Roll-over rights must be preserved in all transmission service offerings to ensure continuity and investment certainty.

6. Bridge Products for Transition

- Transitional service offerings must be structured as bridge products and must not be subject to reassessment or reclassification.

7. **Balanced Financial Commitments**

- Security deposits and financial commitments must be designed equitably across entity types. Large cost shifts will impact entities differently. BPA should explore ways to reduce costs and barriers to entry in helping to expand the transmission system.

8. **Redirect Rights**

- BPA must not restrict the ability of firm transmission customers to exercise their redirect rights.

9. **Batch Study of the Queue**

- BPA should resume queue processing and begin batch studies. NewSun recommends batch sizes of no less than **10 GW** to ensure efficiency and scale.

10. **Customer Transmission Rights**

- Customers must retain the right to request transmission anywhere on the system to support diverse business models and use cases. BPA should not determine the validity of business decisions related to transmission use.

11. **Non-Firm Service Limitations**

- Long-term non-firm service offerings must not provide access to short-term firm Available Transfer Capability (ATC), to preserve system integrity and fairness.

NewSun Energy urges BPA to adopt these principles as foundational elements of the GAT process. These recommendations are designed to support a robust, equitable, and future-ready transmission system that meets the needs of all stakeholders while maintaining regulatory compliance and operational excellence.

Request for Additional Topic-Specific Workshops and Customer-Led Presentations in Grid Access Transformation (GAT) Process

Request for Customer-Led Workshops

To strengthen stakeholder alignment, operational readiness, and understanding of the potential impacts of these proposed changes, we are formally requesting that BPA incorporate **customer-led presentations** as a required component of the transition phase. These presentations should provide customers with a platform to:

- Share concerns, insights, and impacts.
- Offer implementation insights, consequences, and lessons learned.
- Allow the region to hear all insights before any final decisions are made.

This process and flexibility are essential to accommodate the complexity of this effort, ensure full stakeholder engagement, and address outstanding concerns.

Request for Topic-Specific Workshops

Furthermore, NewSun respectfully requests that BPA schedule **dedicated workshops** focused on the following critical topic areas:

- **Commercial Readiness Criteria**
- **Security Deposits and Financial Commitments**
- **Bridge Products & Eligibility**
- **Study Process, including Model Inputs and Assumptions**

These topics are foundational to the success of BPA's Grid Access Transformation and deserve focused attention. Each topic area should be addressed in an individual workshop to allow for deep dives, stakeholder feedback, and collaborative problem-solving. We believe these additions will significantly enhance the quality, transparency, and accountability of the transition process and respectfully urge BPA to adopt them as standard practice.

Conclusion

NewSun Energy formally requests a **customer-led workshop** and urges BPA to allow time for **additional, other customer-led workshops and topic-specific workshops** to support a more comprehensive and collaborative dialogue. Allowing for customer-led presentations is a key first step in achieving this productive engagement.

The stakes are high: the region urgently needs 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.

We look forward to continued collaboration and constructive engagement with BPA leadership and staff.

Sincerely,

NewSun Energy