

August 22, 2025

NewSun Energy

550 NW Franklin Ave., Suite 408

Bend, Oregon 97703

RE: Comments on BPA Grid Access Transformation (GAT) – Future State Proposal

NewSun Energy appreciates BPA's efforts to modernize and improve the transmission system through the Grid Access Transformation (GAT) initiative. However, we remain unclear on several critical aspects of the **Future State proposal** and respectfully submit the following initial comments and questions for BPA leadership consideration.

General Concern: Lack of Clarity

At this stage, it is difficult to fully understand what BPA is proposing under the Future State framework. The materials presented raise more questions than answers, and we are concerned that the scope and implications of the proposed changes have not been clearly articulated. Furthermore, we fail to understand what the process will look like moving from the transition phase to the future state phase.

Key Questions and Areas of Uncertainty

1. What is the Future State intended to solve?

- BPA has not clearly defined the problem statement or how the Future State addresses it. Is this about queue management, system reliability, or commercial reform?
- How will BPA manage studying future requests they receive?
 1. How will this look during and after the transition phase is completed?
 2. When does BPA anticipate the conclusion of the transition state?

2. What is the structure of the Future State?

- Is BPA proposing a new service model, a new planning framework, or a new tariff structure? The terminology used is inconsistent and lacks operational detail.
- What will the model inputs and assumptions be within the future state?

3. How does the Future State interact with existing rights and processes?

- Will current TSRs, rollover rights, redirect rights, and pathways to Long-Term Firm be preserved? How will transitional products be treated? Will the process to request transmission change?
- What impacts will it have on how BPA currently studies and awards the system?

1. ATC changes, flow gate encumbrance changes, redirect changes, etc.?

4. What is the role of customer forecasts and scenario modeling?

- BPA references future load and resource forecasts, but it is unclear how these will be used to inform transmission planning or service offerings.
- What assumptions and inputs will BPA maintain in their models to study what future and current requests look like?

5. What is the timeline and process for implementation?

- The proposed changes appear sweeping, yet there is no clear roadmap, stakeholder engagement plan, or regulatory pathway outlined.
- How do we get from the transition phase to the future state phase? What is this based on, and how long of a transition period do we expect?

6. How will equity and open access be maintained?

- BPA must ensure that all customer types—IPPs, COUs, LSEs, and Marketers—retain fair access to the system. The Future State must not become a gatekeeping mechanism.
- Customers must retain the right to request transmission to meet their individual business case, risk assessment, and needs. BPA cannot be the arbiter of what is or is not a justified use of the transmission system beyond meeting its statutory obligations.

Request for Clarification and Engagement

NewSun Energy respectfully requests that BPA:

- Provide a detailed explanation of the Future State proposal, including its objectives, structure, and implications.
- Host dedicated workshops focused solely on unpacking the Future State framework and including how it aligns to the transitional period.
- Clarify how stakeholder input will be incorporated before any formal adoption or implementation.

We look forward to working collaboratively with BPA to ensure that the Future State is transparent, equitable, and aligned with regional reliability, transition phase, capacity, and clean energy goals.

Sincerely,

NewSun Energy