

Instructions: Please submit to techforum@bpa.gov with, "Proposed Transmission Business Practice Request" in the Subject line.

BPA F 1210.09e
(04-2019)

**U.S. DEPARTMENT OF ENERGY - BONNEVILLE POWER ADMINISTRATION (BPA)
PROPOSED TRANSMISSION BUSINESS PRACTICE REQUEST**

SECTION 1 - BPA STAFF TO COMPLETE THIS SECTION

Proposed Request (PR)#: 02

PR Receipt Date: 4/3/26

PR Title: NSET Deferral V25 Proposal

PR Completion Date: 6/17/26

PR Withdrawal Date:

SECTION 2 - SUBMITTER INFORMATION

a. Name: Amy Webster

b. Company: NewSun Energy Transmission Company LLC

c. Email: awebster@newsunenergy.net

d. Phone: (971) 268-8534

e. Only eligible customers or entities with a relevant interest may submit this request form.

Eligible customer under the terms and conditions of the BPA Tariff.

Representative of an eligible customer.
Eligible customer name:

Interested Entity.

Explain the relevancy of interest in the proposed business practice:

SECTION 3 – TYPE OF PROPOSED TRANSMISSION BUSINESS PRACTICE REQUEST

- a. Revision to Existing Business Practice New Business Practice

b. **Proposed Transmission Business Practice Request Category**

Category A – Clarifications of existing language, grammatical corrections, and/or revisions with minor significance.
(No BPA/Submitter co-hosted stakeholder meeting or conference call required.)

- **Category B** – Material revisions to existing business practices and new business practices.
(BPA/Submitter co-hosted stakeholder meeting or conference call required within 6 business days after the tech forum notice initiating the Proposed Business Practice is sent.)

Category C – Proposed business practices that are necessary to address emergencies or an urgent need; due to statutory obligations or operational, security or reliability concerns.
(BPA/Submitter co-hosted stakeholder meeting or conference call required as soon as practicable after the tech forum notice initiating the Proposed Business Practice is sent.)

Reason for Category C:

SECTION 4 - TITLE AND VERSION OF BUSINESS PRACTICE

Title: Deferral of Transmission Service (Extension for Commencement of Service)

Version Number: 24

List of affected business practice sections and subsections:

Deferral Business Practice Section A.6.b



SECTION 5 - OBJECTIVE OF PROPOSED TRANSMISSION BUSINESS PRACTICE REQUEST

a. Describe the problem/issue this request will resolve.

Under the existing rule, a deferral transmission service request (“TSR”) is refused if the parent reservation has OASIS actions that decrement capacity before confirmation. While historically a minor issue, this issue is highlighted and has become material due to BPA’s pause in queue processing, which stalls redirect requests and forces customers to withdraw them simply to complete a deferral transaction—even for de-minimis requests. This creates unnecessary disruption, administrative burden, and inefficiency in the queue.

b. Describe the impacts and benefits of the suggested change on Bonneville and stakeholders, to the extent that the submitter may know this information.

The proposed change will strike an appropriate balance between flexibility and stability during periods of uncertainty, while preserving the overall integrity of the BPA queue for all stakeholders. Absent this change, customers seeking both deferral and redirect options would be forced to abandon existing requests.

This outcome is particularly problematic now that the queue processing is paused due to circumstances outside of customers' control. The forced withdrawals mentioned above unnecessarily disrupt queue order, introduce additional volatility, and require customers to re-enter the queue through new or re-submitted requests.

This increases BPA's administrative burden and drives additional studies that are unrelated to project viability and driven solely by procedural constraints. In contrast, allowing increased flexibility for deferral and redirect requests during such periods benefits all stakeholders.

Customers retain the ability to adapt to evolving commercial and regulatory conditions while maintaining their established queue position, providing critical certainty and predictability. Preserving queue position for customers who have already invested significant time and resources reduces unnecessary churn and avoids repeated restudies that do not advance system planning outcomes. An orderly and stable queue improves administrative efficiency, supports more accurate planning assumptions, and mitigates workload spikes associated with queue disruption.

Overall, this change enhances flexibility during uncertain periods without sacrificing certainty, supports BPA's operational efficiency, and avoids outcomes that would otherwise undermine orderly queue management. Specifically, the proposed change will: preserve queue priority and capacity rights for customers that have already established a place in the queue, reduce uncertainty for developers and load-serving entities navigating complex and evolving timelines, uphold open-access principles while simplifying BPA's administrative workload and reducing unnecessary process churn, and support BPA objectives by improving efficiency, transparency, and predictability in queue management.

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SECTION 6 – TRANSMISSION BUSINESS PRACTICE PROPOSAL

In the area below, please copy and paste the transmission business practice sections(s) and language for which you are requesting revisions, with all edits red-lined or the language for the proposed new business practice. If you prefer to use an attachment to provide the proposed revisions, please add the attachment to the email message along with this form.

[A red-lined version with explanation is also attached.]

Deferral of Transmission Service (Extensions for Commencement of Service) Version 24
Section A.6.b

6. A Deferral TSR will be REFUSED if:

- a. There is insufficient capacity for the deferred time; or
- b. The Parent Reservation has OASIS actions that decrements the capacity needed to enable a Deferral TSR prior to being CONFIRMED, except in the case of pending redirect requests. In the event a Parent Reservation has both a pending Deferral Request and Redirect Request, the Redirect Request will NOT reference the Parent Reservation but will instead be tied to the new Deferral TSR AREF number.

NewSun wishes to further clarify how this business practice change would work in practice. Given the limited space available on the pdf, the specifics of the proposed change will be articulated here in this addendum. Please accept this explanation as if it were a part of the attached official form.

As NewSun understands the current process, the Parent (TSR 1 AREF No.) has associated encumbered capacity. When the deferral is requested, that capacity moves to the Deferral (TSR 2 AREF No.). So, when there is also a redirect request for the Parent (TSR 1 AREF No.), there is no longer any associated capacity under that TSR 1 AREF No. This is an operational challenge that can be remedied by adherence to the following practice: instead of the redirect referencing the Parent (TSR 1 AREF No.), it will align with the Deferral (TSR 2 AREF No.). The redirect's reference to the Parent (TSR 1 AREF No.) will be replaced with the Deferral (TSR 2 AREF No.) request. The proposed business practice language is below, with additions noted in red and underlined:

6. A Deferral TSR will be REFUSED if:
 - a. There is insufficient capacity for the deferred time; or
 - b. The Parent Reservation has OASIS actions that decrements the capacity needed to enable a Deferral TSR prior to being CONFIRMED, except in the case of pending redirect requests. In the event a Parent Reservation has both a pending Deferral Request and Redirect Request, the Redirect Request will NOT reference the Parent Reservation but will instead be tied to the new Deferral TSR AREF number.

NewSun appreciates BPA staff and stakeholders' attention to this matter and looks forward to subsequent discussions on this proposal.

Thank you,
NewSun Energy Transmission Company LLC