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*Via email*

U.S. Department of Energy  
Bonneville Power Administration  
techforum@bpa.gov

**RE: Comments on Proposed Changes to Transmission Business Practice on the Transition Process**

NewSun Energy Transmission Company LLC (“NewSun”), and the Pacific Northwest Renewable Interconnection & Transmission Customer Advocates (“PRITCA,” together the “Commenting Parties”) provide the following comments on the BPA’s proposed changes to its Transmission Business Practices on the Transition Process.

**About Us**

NewSun and PRITCA (the “Commenting Parties”) together represent more than 100 BPA Interconnection Customers. Collectively, the Commenting Parties comprise more than a quarter of the current BPA interconnection queue. The Commenting Parties are signatories to well over 100 study agreements, and have participated in hundreds of BPA scooping and study report meetings involving wind, solar, geothermal, battery storage and pumped storage projects ranging in size from 20 to 600 MW. PRITCA also includes BPA Transmission Customers with thousands of MW of confirmed long-term firm transmission rights on the BPA transmission system and many thousands of MW more of transmission requests for future long-term firm service. Collectively, the Commenting Parties have provided tens of millions of dollars to BPA over the past ten years for environmental studies, engineering and procurement of network upgrades, deposits for Large Generation Interconnection Agreements (“LGIAs”), and other study agreements. The Commenting Parties’ members have successfully developed hundreds of megawatts of generation that are provided to both public power and IOU loads.

July 23, 2025  
Page 2

## Comments

1. *BPA should not foreclose an individual study review option.*

BPA proposes to amend Section H(3)(c) of the Business Practice by expressly stating that BPA will not offer individual study review meetings during the Customer Review Period. BPA should shape its Business Practices by outlining processes available to customers, not by limiting the actions BPA itself will take.

BPA should retain individual study review meetings to address questions customers may have about individual study results. In the experience of Commenting Parties, BPA studies may be very difficult to parse, even for trained engineers with deep experience in transmission expansion. Individual study review meetings therefore serve an important function in assisting Interconnection Customers to understand the study results, and to identify potential errors in the study, which helps avoid even longer delays later in the process. At a minimum, BPA should not foreclose the possibility of holding such meetings altogether. Keeping this option available is beneficial both to BPA and its Interconnection Customers because these meetings provide a forum for deeper discussion, clarification, and problem-solving than may be possible in broader group settings. Making it policy to ban such meetings is unnecessary and could limit BPA's ability to address unique issues and maintain the viability of the cluster study process.

## Conclusion

The Commenting Parties urge BPA to revisit and reject its proposal to modify its Transition Process Business Practice by eliminating individual study review meetings. We believe these meetings serve an important function and BPA therefore should keep such meetings available rather than eliminating them outright.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Eric Christensen", with a long horizontal flourish extending to the right.

Eric L. Christensen  
Attorney for Commenting Parties