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Comments to BPA on NewSun's proposed version 25 of the Deferral business practice

PGE appreciates NewSun's June 30, 2026 presentation and BPA's hosted call regarding the proposed draft version 25 of the Deferral business practice. PGE understands the administrative burden NewSun described and how the suggested edits could help resolve it. However, PGE believes the suggested edits are incomplete and requests that BPA hold another call to review complete business practice language describing the potential mechanism(s) for implementing NewSun's proposal.

The following questions illustrate where PGE believes additional clarity is needed:

1. How is the Redirect TSR updated to reflect the new Parent ARef resulting from the Deferral?
 - a. Does BPA modify the original Redirect TSR to override the Parent ARef?
 - b. Does BPA create a new Redirect TSR with a new Child Aref, with the queue time overridden to align with the originally submitted Redirect?
2. How are the requested start and stop dates of the Redirect TSR affected by the proposal?
3. At what point is the Redirect TSR modified or replaced – shortly after submission of the Deferral request, or only after the Deferral is CONFIRMED?
4. What happens to the Redirect TSR if a Challenger wins a Deferral Competition?
5. Will these events be posted publicly to ensure transparency?

As PGE considers this proposal and the questions that remain open, it appears that NewSun's recommendation shifts administrative burden to BPA, since the proposal would require manual intervention by BPA staff to implement actions that OASIS functionality does not currently support. PGE encourages BPA to consider responses to the questions above, as well as whether implementation of NewSun's proposal is consistent with the



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NAESB OASIS Standards and Communication Protocols, and what impacts it may have on TC-27 and GAT implementation.

Respectfully,

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