



July 17, 2025

NewSun Energy
550 NW Franklin Ave.
Bend, Oregon 97703

RE: Comments on BPA Business Practices – Conditional Firm Service (CFS) Version 30

To: Bonneville Power Administration (BPA),

NewSun Energy appreciates the opportunity to provide comments on the proposed Conditional Firm Service (CFS) Business Practice Version 30. We submit these comments with a spirit of collaboration and shared responsibility for the future viability of the Northwest grid.

We are deeply concerned with this business practice and the proposed changes, particularly the removal of Bridge CFS as a viable path to Long-Term Firm (LTF) service. This poses a significant threat to the viability of project finance, long-term PPAs, market liquidity, and ultimately, the clean energy transition. These changes risk undermining the very foundation of investment certainty that BPA has historically provided well.

Bridge CFS has been the cornerstone of BPA's ability to flex existing system capacity into awardable service. It has enabled projects to begin delivering power, generating revenue for BPA, while long-term upgrades are pursued. The proposed elimination of this pathway and the introduction of new discretionary reassessment and cancellation rights introduce unacceptable uncertainty.

We urge BPA to **integrate this business practice into the Grid Access Transformation (GAT) process**, where it can be evaluated holistically alongside other major reforms being discussed in that forum. The current proposal risks fragmenting policy and undermining trust in BPA's long-term commitments.

Key Concerns:

- **Loss of Bridge CFS Certainty** jeopardizes the viability of TSRs that support resource development and load service in the region, including those that have been providing funding already, such as through PEAs. Furthermore, removing a product that provides funding for BPA projects.
- **Reassessment language** appears to grant BPA unilateral authority to terminate service, even after studies and funding are complete.

- **No clear customer protection** or refund mechanisms if BPA cancels projects after PEAs or ESAs are funded.
- **Potential discrimination and market distortion**, especially if BPA reallocates ATC to junior TSRs or removes queue order. Changes must consider investments with existing requests, whether having been through complete studies or not.
- **Rolling policy risk**: New language allows BPA to change terms midstream, undermining rollover rights and long-term service continuity.
- **Unclear obligations**: Customers should retain the right to continue CF service with known curtailment exposure, not be subject to BPA's sole discretion at reassessment intervals.

Our Request:

We ask BPA to:

1. **Pause the implementation of Version 30** and move it into the GAT process for full stakeholder review, along with the multiple other business practices being considered for change and solutions moving forward.
2. **Preserve Bridge CFS** as a viable, financeable, and certain path to LTF service.
3. **Clarify and limit BPA's discretionary cancellation rights**, ensuring fair treatment and investment protection.
4. **Guarantee rollover rights** for customers who accept curtailment risk under CF service.
5. **Ensure a CFS equivalent to a Bridge product** is offered through the GAT process with rollover rights.

This is not just a policy issue; it is a grid access issue impacting project viability. It is a clean energy integration issue. It is a regional economic issue. And it is a regional investability issue. We stand ready to work with BPA and other stakeholders to ensure that Conditional Firm Service continues to serve as a bridge, not a barrier, to the long-term stability of the region.

Sincerely,

NewSun Energy