

Initial Comments Regarding BPA October 19, 2026 GAT Workshop Proposals (SPRINT, PLAID, RAPID, and Open Season)

Dear Bonneville,

These comments are submitted on behalf of NewSun Energy LLC (“NSE”) regarding BPA's October 19, 2026 Grid Access Transformation ("GAT") Workshop introducing the Speed to Power Request for Interim Non-firm Transmission (“SPRINT”), Paired Load and Integrated Dispatch (“PLAID”), Rapid Access Products & Interconnection Delivery (“RAPID”), and Open Season proposals. These comments supplement NSE’s previously filed Future State comments and preserve all rights and objections.

At the outset, NSE appreciates BPA's efforts to address growing regional load, transmission constraints, and resource adequacy challenges. We recognize the importance of developing pathways that support economic growth, transmission expansion, new generation, energy storage deployment, and reliability across the Pacific Northwest.

However, BPA has introduced a suite of significant transmission, interconnection, planning, and cost allocation reforms without providing sufficient information, analysis, proposal detail, or stakeholder process to allow thoughtful review. The current schedule does not provide a reasonable opportunity for interested parties to understand the proposals, evaluate the consequences, identify unintended impacts, or provide informed feedback.

BPA Has Not Provided Sufficient Information for Meaningful Comments

The October 19 workshop raised substantially more questions than answers. Throughout the workshop, stakeholders repeatedly sought clarification regarding:

- Open access implications.
- Comparability concerns.
- Cost allocation methodologies.
- Transmission service terms.
- Curtailment frameworks.
- Resource adequacy implications.
- Interaction with existing transmission rights, including ST ATC and redirects.
- Interaction with TC-27.
- Treatment of existing queue positions.
- Criteria for selecting "high value" projects.
- Reliability and operational assumptions.
- Staffing requirements and implementation feasibility.

Numerous questions posed during the workshop remained unanswered or were deferred to future workshops and future proposal releases. As reflected in the workshop discussions, stakeholders sought but did not receive sufficient information to inform stakeholder comments and perspectives.

SPRINT Eligibility and Priority

Stakeholders requested clarification regarding:

- Whether SPRINT participants would effectively move ahead of existing transmission customers awaiting studies or service.
- How BPA intends to address customers who have been waiting in the queue while BPA completes studies and facilities processes.
- How unsuccessful SPRINT applicants with existing queue positions would be treated.
- What rights and obligations accompany participation in SPRINT.

Open Access and Comparability Concerns

Whether BPA has evaluated open access and comparability implications associated with these proposals.

- Whether BPA intends to follow FERC guidance regarding large load curtailment policies.
- Whether BPA's proposal is consistent with existing transmission rights and service expectations.
- Is BPA deciding to abandon Open Access principles as a guiding objective with future processes?

These questions go directly to the legal and policy foundation of the proposals and remain largely unanswered.

Criteria for Awarding Service

BPA repeatedly referenced selecting projects based upon value, economics, reliability, net present value, and other benefits.

Stakeholders requested clarification regarding:

- What constitutes the "highest value proposal."
- NPV is a black box that needs to be articulated in further detail as to what and how BPA will evaluate it.
- How reliability, resource adequacy, generation enablement, and transmission planning benefits will be considered.

The workshop provided no detailed methodology, examples, quantitative framework, weighting criteria, or sensitivity analysis. Without this information, stakeholders cannot reasonably evaluate the proposals, nor the potential discriminatory or unintended consequences that may result.

Generation, Resource Adequacy, and Co-Located Resources

Numerous questions sought explanation regarding:

- The meaning of "co-located generation."
- Has BPA considered how the non-firm transmission pathway impacts the region's ability to meet RA requirements?
- What are the potential impacts on the short-term ATC market?
- Does this impact the proposed CFS awards through TC-27?
- Assumptions made on the likelihood of curtailments with all these new transmission awards.
- What is the pathway to LTF from the non-firm solution?

These are fundamental design issues that remain unresolved.

Transmission Service and Commercial Structure

Participants requested clarification regarding:

- The meaning of a required "path to firm" commitment.
- How transmission service would function when generation and load are located behind the same delivery point or separate points.
- What product customers are actually bidding for in the proposed Open Season framework.
- How has BPA reconciled awarding GWs of new non-firm transmission, with pathways to LTF, through the different programs, against impacts to the system, existing encumbrances, and the existing short-term market.

These issues affect project finance, operational flexibility, and customer decision-making, yet BPA has not provided sufficient detail.

Cost Allocation, Staffing, and Implementation

Workshop participants also sought information regarding:

- Direct assignment of upgrade costs.
- It is uncertain whether all the proposed new fees and study deposits are non-refundable.
- What level of staffing is needed to perform all of this and the associated cost.
- What sort of "Blank Check" is BPA asking for?

No comprehensive staffing, budgeting, implementation, or resource-impact analysis has been provided. Sign up, we will rush some things forward, and trust us everything will work out, was the message received.

Potential Impacts on TC-27 Have Not Been Analyzed

NSE is particularly concerned that BPA introduced these proposals immediately following the TC-27 objection deadline without providing any analysis regarding how the proposals interact with TC-27.

As currently understood:

- SPRINT appears intended to allocate transmission capability to new large loads on an expedited basis.
- PLAID similarly contemplates significant new load additions.
- Open Season proposals contemplate new mechanisms for allocating transmission capacity.
- RAPID introduces additional pathways that may affect planning and transmission development priorities.

Yet BPA has not explained:

- How these proposals affect existing transmission rights.
- How these proposals affect available ATC. In both the short-term and long-term market.
- How these proposals affect Conditional Firm Service.
- How these proposals interact with TC-27 transition requests.
- Whether existing queue positions are preserved.
- Whether transmission capability that might otherwise support TC-27 awards will be redirected to these initiatives.

These issues are critically important and should be fully analyzed before BPA proceeds further.

Additional Workshops and Extension of Comment Deadlines Are Necessary

The October 19 workshop served primarily as an introduction to a series of concepts that remain largely undeveloped.

Notably:

- BPA indicated candidate sites will not be released until a future workshop. This is a very important aspect of the proposal, along with how it impacts transmission, that lacks sufficient clarity to inform stakeholders' ability to comment effectively.

Meaningful stakeholder engagement requires access to sufficient information before comments are due. Stakeholders cannot reasonably evaluate proposals that remain incomplete, where key criteria have not been released, and where central aspects of implementation remain undefined.

Accordingly, NSE respectfully requests that BPA:

1. Conduct at least two additional stakeholder workshops dedicated to SPRINT, PLAID, RAPID, and Open Season proposals.
2. Publish written responses to all stakeholder questions submitted during the October 19 workshop, and follow-up comments received.
3. Release all evaluation criteria, scoring methodologies, cost allocation concepts, operational assumptions, curtailment assumptions, and implementation details before comments close.
4. Publish analysis of interactions between these proposals and TC-27, including impacts on ATC, Conditional Firm Service, queue positions, and transmission planning assumptions.
5. Extend the comment deadlines to allow stakeholders a reasonable opportunity to review additional information and provide informed comments.
6. Include a TSEP-like study with the SPRINT determination analysis to better inform the process, opportunities, and impacts.

Conclusion

These proposals could fundamentally reshape transmission access, transmission planning, transmission service allocation, large load integration, generation development, and investment decisions throughout the Pacific Northwest for decades to come.

Given the magnitude of these potential reforms, BPA should proceed deliberately and transparently. Stakeholders presently lack sufficient information to evaluate the proposals, identify unintended consequences, assess legal and policy issues, understand customer impacts, or meaningfully participate in the development process.

Additional workshops, written responses, further analysis, and additional comment time are necessary to ensure a complete and informed record before BPA advances these initiatives. The region needs to understand how and what it means for BPA to be promising so much non-firm transmission as a means to resolve the constraints and future obligations on the system. We are at a pivotal moment; rushing through half-baked processes that deviate from standing practices must be accompanied by supporting analysis, communication, and true feedback opportunities.

NSE appreciates the opportunity to provide these comments and reserves the right to supplement them as additional information becomes available.