# INCOUSINE ENERGY

#### **NewSun Energy Presentation**

BPA Transmission Planning Reform Customer-Led Workshop

May 6, 2025

### BPA Transmission Reform - AgendalewSun

- Important Principles, Observations, & Reference Points
  - Nature of Development and Transmission Market
  - Recent BPA Experiences TSEP & results
- Recommendations & Ideas
  - Triaged Approach to current TSEP Queue
  - Declaring "State of Transmission Need"
  - Tiered-Growth Options
  - Change de minimus threshold
  - PEA Funding:
- Feedback on Other Ideas

## Important Principles & Reference Points Sun

- Era of Cheap PNW Market Power is Over
- Era of Unmeetable Need Has Begun
- Diversity of Business Models on our Power Superhighway
- Key Litmus Tests
  - Does Merchant Power Work?
  - Does it work for Traders?
- Prior TSEPs vs. 2022/23/24 TSEP: "Everything Everywhere All at Once"
- The Problem With Backward Looking Changes
- Ensure Any & All Can Play, Invest, Access
- Reference Cases for TSRs Past & Future
  - Historic & Important LTF TSRs
    - Avangrid Requests
  - Serving AWS / UEC Growth

# NewSun / Experience & ApproachewSun

#### Experience:

- Careers, interconnections, markets, projects, reforms, regulatory:
- \$Bs of projects, decades of experience
- · World-leading Projects & Front Wave of Market Transitions
- #1 PNW Developer of Gen Supply

#### BPA + PNW Focused experience

- Extensive BPA IX/TX Studies Experience
  - Completed 3-4 dozen BPA IX and TX studies
  - 100+ BPA scoping & reports results meetings
  - Read over 150-200+ BPA Interconnection Studies
    - Covering 15 years
  - All TSEPs since TSEP began
  - 20-30 GW of career interconnection studies/processes
- Relevant OR+WA Market Experience (incl RFPs + OPUC issues)

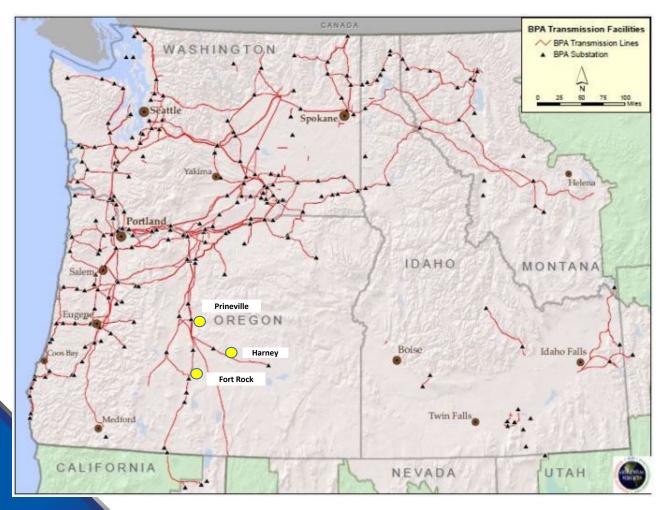
#### • IX/TX Reform Experience

- CAISO cluster conversion + PAC, FERC, and other IX reforms
- FERC + BPA Adopted Recommendations
- BPA TC-25 Reform Leadership informed by BPA IX experience, recognizing BPA strengths

### NewSun Experience / Philosophy NewSun

- Values + Realism Driven
- Project Development + Transactional Realities Must Inform Practices & Policies
- Extensive BPA IX + TX study process experience
- Round-Peg Approach to BPA realities + Mkt Needs
- Pro- Good-Precedent & Fairness
- Pro- Market, Pro- Investability Stability
- Pragmatists focused on Climate Outcomes & Market Success
- Low Hanging Fruit + Creative Practical Solutions
- Ideas informed from practical experience, conversations, observations with BPA process and team
- Lots of Requests, Studies, Service Granted & Denied, Funded & Not Funded, Etc
- Also informed by issues in other 'reforms' not-as-advertised, emergent issues, etc
- PNW is different
- Don't fix what ain't broken

**BPA** – Backbone / Superhighway of the PNW



# NewSun. ENERGY

- BPA serves 142 different LSEs, incl.
  - 6 IOUs
  - 54 Co-ops
  - 42 municipalities
  - 28 PUDs
  - +Power to CA / NWACI / PDCI / SMUD...

#### 6 IOUs

- Pacific Power
- Portland General Electric
- Puget Sound Electric
- Avista
- Idaho Power
- NorthWestern Energy

#### Power Marketers & ESS

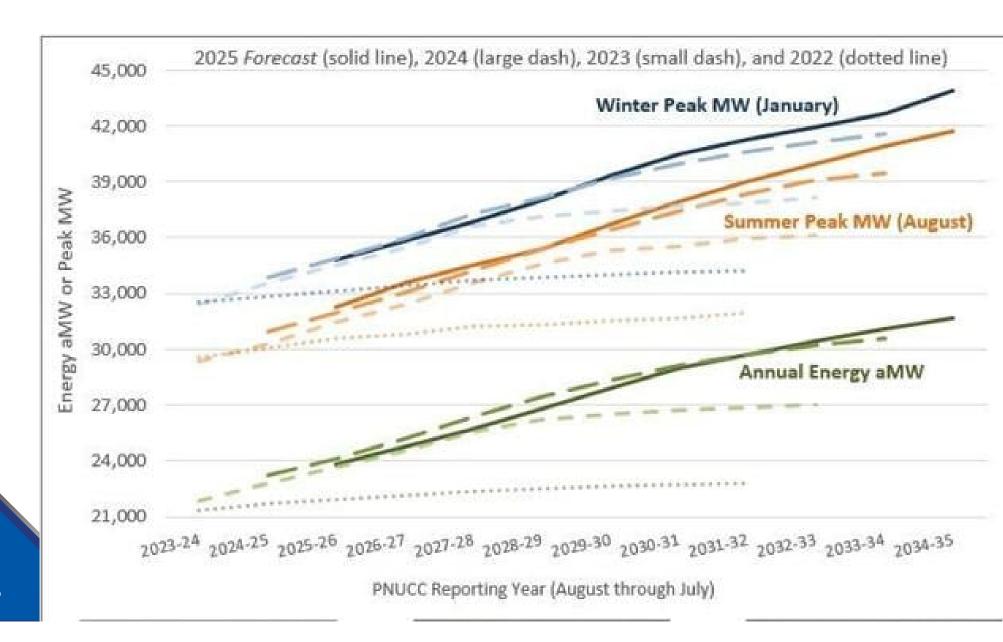
- Morgan Stanley
- Shell Energy
- PowerEx
- TEA
- Avangrid

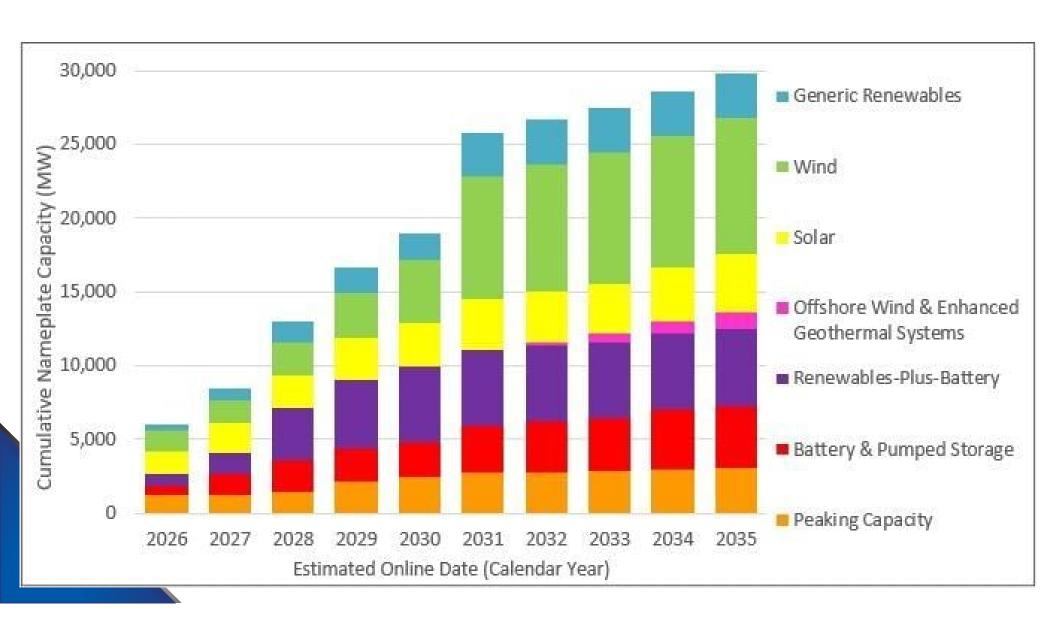
#### New & Corporate/Data Center Loads

- Meta/Facebook
- Apple
- Alphabet/Google
- Amazon
- Intel

### Nature of Market – PNW Generally ewsun

- BPA dominant @: Public Power + BPAT as Mkt Superhighway
- Bilateral: Esp non-public & Tier2+
- BPA won't procure supply... Can't rely on BPA to solve Supply
- Fair bit of S/T Tx Headroom on System
- Lots of Types of Players
- WORLD WILL BUILD WHERE IT CAN.
  - This





# BPA Stakeholder Mega-Diversity NewSun

### So Many Types, So Many Ways to Slice Us...

- Publics + IOU + ESS
- Power Trading + (L/T) Power Supply
- Gen-Owning + Non-Gen-Owning
- Slices + Dispatchable Assets + Block + Load-Following + Hybrids
- Developers + Operators; Sellers + Buyers + Both
- Regulated + Non-Regulated
- Big Folks + Small Folks
- Supply, Trading & PPAs: Real Time + Long-Term + 5-year
- TOs + non-TOs
- LSE Load Growth + Non-Load Growth + Wide Range
- 100% Self-Procuring + 100% 3<sup>rd</sup> Party Dependent + Mixed Sources (BPA + non-BPA);
  - Self: In-House + Out of House

#### Meanwhile...

Supply Pressures, including Regulatory + Market Demand Overlays++:

- WUTC + CETA
- OPUC + HB 2021 + RPS
- New Load Growth
  - Smaller Publics
  - Mega-Industrials
- Cities, LSEs, TCs, IOUs, NT, ...
- EIM
- Interties + CA demand
- Gen Retirements
- PSPS
- ٠ ..

### Observations from Last TSEP



- Everything Everywhere All At Once
  - vs. historical "leanings"
- PEA funding
- Realistic Timelines
- Montana Stuff... Seems like a pipe dream

(toggle to maps / TSEP results)

### Nature of the New World Order NewSun



- The PNW Surplus Supply is Gone
- Load Growth, Shift in Demand Curve = Permanent
  - Phase One = "Normal Data Centers" is Over
  - Phase Two is Here
    - AI = WAR = Arms Race
      - · Commercially, Nationally, Militarily, Everywhere
      - Like Dot-Com + WW2
- So what do we do about it?

# BPA Constraints & Issues, Practically Sun Speaking

- Staffing, Staffing, Staffing:
  - PMs, Proj Engs, ...
- Everything Crosses Federal Lands
- SCM Costs vs. Building a Team for the Long Haul & Efficiency

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### **PROPOSALS**



- Interim Solutions:
  - Triaged Partial TSEP
    - Apply prior builds, study first [traunch(es)]
    - Use results to
    - Relaxed PEA stds
    - Low-Hanging Fruit Redirects & PTP
  - Accelerated Awards (& Contingent Awards)
  - Other
- Declare an "Era of TX Need" Then Build
  - Staff Accordingly
- PEA Funding Fix
- No Backward-Looking Changes
- Ensure Litmus Tests are Met

### PEA Funding



### **About**

- Currently Primary Mechanism for BPA @ Customer Seriousness
- Examples... Prior TSEPs (2017 vs. 2022 vs. 2024)
- References/Notes re: Last TSEP Outcomes
- Value + Limits of "Skin in the Game"

### Changes to Consider

- Alt Amounts
  - Smaller %s (if Very Large)
  - Amounts for First
- Alt Security Options
- Refunds (Partial or Whole) if Projects Move to [Evolving Grid]

### Feedback on Other Ideas



- Studying Higher Growth/Need Cases
- W.r.t. IOU RFP Timing Considerations:
  - Nice idea, but bad idea, impossible idea

### ADDITIONAL PROPOSALS:



- Early BPA Key Long-Lead Equipment Orders
  - We know today that lots is needed
  - Shouldn't be further constrained
  - Q should be: What % of Projected Need are we Locking Down?
- SCM Issues
- Larger Sub-Station Footprints = Surplus Land = Room to Grow