

January 16, 2026

NewSun Energy Transmission Company LLC  
550 NW Franklin Ave., Suite 408  
Bend, Oregon 97703

**RE: Comments on TC-27 Tariff Proceeding – Deferral Business Practice**

NewSun Energy Transmission Company LLC (“NSET”) requests that Bonneville power Administration (“BPA”) revise its current Deferral Business Practice (Section A.6.b) to address conflicts between redirect requests and transmission deferrals. Under the existing rule, a deferral transmission service request (“TSR”) is refused if the parent reservation has OASIS actions that decrement capacity before confirmation. While historically minor, this issue has become material due to BPA’s pause in queue processing, which stalls redirect requests and forces customers to withdraw them simply to complete a deferral transaction—even for de minimis requests. This creates unnecessary disruption, administrative burden, and inefficiency in the queue.

**Recommendation:**

BPA allows deferrals to proceed even when a redirect request is pending, without requiring withdrawal of the redirect. This flexibility would:

- Preserve queue priority and capacity rights.
- Reduce uncertainty for developers and load serving entities (“LSE”) navigating complex timelines.
- Uphold open-access principles while simplifying BPA’s administrative burden.
- Support TC-27 objectives by improving efficiency and transparency in queue management.

NSET remains committed to collaborating closely with BPA and the region throughout the TC-27 transition and future state processes. Our shared goal is to deliver outcomes that uphold reliability, equity, and affordability while advancing the region’s transmission expansion and clean energy integration. We look forward to continued dialogue and constructive engagement to ensure these objectives are met.

**Sincerely,**

**NewSun Energy Transmission Company LLC**