

Response to Comments NewSun Energy Transmission Company LLC Proposal and Decision – Deferral of Transmission Service

BPA Transmission Business Practice

Modification to Version 24

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Modification to Version 24

This document contains comments, responses, and Bonneville’s decision regarding the NewSun Energy Transmission Company LLC (NewSun) proposal to change Version 24 of the Deferral of Transmission Service (Extension for Commencement of Service) Business Practice. The proposal was posted for comment from June 22, 2026, through July 29, 2026.

This is Bonneville’s final agency action in regard to this business practice proposal.

For more information on business practices out for comment, visit the BPA [Proposed Business Practices webpage](#).

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A. NewSun Proposal Summary

NewSun outlined their understanding of the Deferral TSR process as follows: “the Parent (TSR 1 AREF No.) has associated encumbered capacity. When the deferral is requested, that capacity moves to the Deferral (TSR 2 AREF No.). So, when there is also a redirect request for the Parent (TSR 1 AREF No.), there is no longer any associated capacity under that TSR 1 AREF No.”

This is an operational challenge that NewSun believes “can be remedied by adherence to the following practice: instead of the redirect referencing the Parent (TSR 1 AREF No.), it will align with the Deferral (TSR 2 AREF No.). The redirect’s reference to the Parent (TSR 1 AREF No.) will be replaced with the Deferral (TSR 2 AREF No.) request.” The proposed business practice language for Section A.6.b is below, with additions noted in red and underlined:

- “6. A Deferral TSR will be REFUSED if:
- a. There is insufficient capacity for the deferred time; or
 - b. The Parent Reservation has OASIS actions that decrements the capacity needed to enable a Deferral TSR prior to being CONFIRMED, except in the case of pending redirect requests. In the event a Parent Reservation has both a pending Deferral Request and Redirect Request, the Redirect Request will NOT reference the Parent Reservation but will instead be tied to the new Deferral TSR AREF number.”

NewSun stated in their PowerPoint presentation on June 30, 2026, “this does not change the existing encumbered capacity of the parent. It simply aligns the redirect request to the newly created TSR #.”

NewSun also listed the following as benefits of this proposal in the June 30 PowerPoint presentation:

“Reduces Administrative Burden

- Minimizes unnecessary withdrawals, resubmittals, and restudies.
- Avoids studies driven by procedural constraints rather than actual project viability.
- Reduces BPA workload associated with queue churn and disruption.

Preserves Queue Integrity

- Allows customers to maintain established queue positions and capacity rights rather than withdrawing and re-entering the queue.
- Reduces unnecessary queue disruption and volatility during periods when processing is paused.

Improves Certainty & Flexibility

- Provides customers the ability to respond to changing commercial, regulatory, and project-development timelines.
- Balances needed flexibility without sacrificing queue stability or transparency.

Enhances Regional Planning

- Supports more orderly queue management and more reliable planning assumptions.
 - Improves efficiency, predictability, and transparency for all stakeholders.”
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B. Portland General Electric

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?

BPA Response 1

Comments regarding an additional call or workshop on this topic are addressed in Bonneville's Decision section.

In response to question a:

BPA would not modify the original Redirect TSR to override the Parent AREF (Related Ref.) the OASIS functionality does not allow this type of parameter to be overridden.

In response to question b:

BPA will not create a new Redirect TSR.

The Customer would need to withdraw the existing Redirect TSR (as required today) and submit a new Redirect TSR matching the same parameters of the original Redirect TSR with the new Related Ref. BPA then would override only the queue time of the new Redirect TSR.

The concept that only the Related Ref. would change in the resubmitted Redirect TSR is communicated in NewSun's proposed business practice language by the sentence that reads, "In the event a Parent Reservation has both a pending Deferral Request and Redirect Request, the Redirect Request will NOT reference the Parent Reservation but will instead be tied to the new Deferral TSR AREF number."

2. How are the requested start and stop dates of the Redirect TSR affected by the proposal?

BPA Response 2

Start and stop dates must match the original Redirect TSR, otherwise the Redirect TSR would be considered a "new" Redirect TSR and would receive a new OASIS queue time.

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?

BPA Response 3

BPA would require a new Redirect TSR to be submitted the same day that the Deferral TSR is CONFIRMED. If submitted after, BPA would consider it a “new” Redirect TSR and it would receive a new OASIS queue time.

4. What happens to the Redirect TSR if a Challenger wins a Deferral Competition?

BPA Response 4

BPA would review the Deferral TSR at the time it is CONFIRMED on OASIS for a valid Challenger:

- If a valid Challenger is not found, then no further action is needed.
- If a valid Challenger is identified, the Deferral Defender will be competed against the valid Challenger.
 - If the Defender defends against the valid Challenger with the earlier start date of service, the new Redirect TSR will be REFUSED due to lack of ATC. The Defender would need to submit a Redirect TSR that will receive a new OASIS queue time.
 - If the Defender does not defend, the Deferral TSR will be SUPERSEDED by the Challenger’s TSR, and the new Redirect TSR will be REFUSED due to lack of ATC.

5. Will these events be posted publicly to ensure transparency?

BPA Response 5

All TSR actions would be done on OASIS therefore making it transparent.

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

BPA Response 6

PGE is correct in the assessment that implementation of the proposal would require manual processes on the part of BPA.

BPA appreciates the comments submitted by PGE for consideration.

Please see the Bonneville’s Decision section regarding alignment with NAESB standards and comments on BPA initiatives.

C. NIPPC and RNW

NIPPC and RNW Comments on Proposed Changes to Deferral of Transmission Service Business Practice

NIPPC and RNW offer the following comments on the Customer Proposal to amend the Deferral of Transmission Service Business Practice. NIPPC and RNW object to the proposed amendment to the Deferral of Transmission Service Business Practice on both technical and policy grounds. At its core, the proposal raises the question of how many elements of a transmission service request can a customer change at the same time without losing the queue priority of the original request.¹

¹The question is similar to the famous thought problem -- the "Ship of Theseus". In ancient times, the people of Athens would commemorate Theseus' rescue of the children of Athens from Crete by sailing his ship on an annual pilgrimage to Delos to honor the god Apollo. Over time, regular maintenance and repairs resulted in nearly all of the ship's timbers being replaced. Greek philosophers posed the question: How many of the ship's timbers can be replaced before the ship is no longer the ship that Theseus sailed from Crete? NIPPC and RNW do not take a position on this question.

BPA explained during the call with customers on June 30, 2026 the basis for our technical objections. The NAESB standards which form the basis of the current OASIS programming never contemplated that a transmission customer would attempt to perform a redirect while a transmission request was in deferral status. Accordingly, the current functionality of OASIS does not support the proposed business practice amendment. We understand that the only way BPA could implement the customer proposal would be to use a manual process to change the customer's request – and that this manual mechanism was intended to correct errors and not to be used in the normal course of processing transmission service requests. NIPPC and RNW do not support the application of a manual error correction process as a work around to implement business practice changes that are inconsistent with the NAESB standards. NIPPC and RNW are also concerned about the increased workload on BPA staff that might result from manual processing of changes to transmission service requests outside of those changes supported by OASIS.

BPA Response 7

BPA recognizes that NIPPC and RNW object to the proposed amendment to the Deferral of Transmission Service Business Practice on both technical and policy grounds.

NIPPC and RNW are correct in their assessment that implementation of the proposal would require additional processes on the part of BPA and those processes would need to utilize a manual mechanism to work around normal OASIS functionality.

NIPPC and RNW also object to the proposal on policy grounds. The core components of a transmission service request are the service commencement date, the point of receipt ("POR"), the point of delivery ("POD"), and the quantity. Under the customer proposal, a customer would be allowed to change the POR, the POD (or both), during the time that the customer's request is in deferral status. The only element of the original request that would not change would appear to be the quantity.² NIPPC and RNW recognize that customers have a process to change the service commencement date of a request without losing their queue priority (through the deferral of service business practice). We also recognize that

customers can change the POR, the POD, or both without losing their queue priority (through the redirect of transmission service business practice). Our position, however, is that a customer should not retain its original queue priority when it attempts to change its POR, POD, or both while the customer's request is in deferral status. We believe that a customer should not be allowed to jump the queue by retaining a transmission service request's original queue priority when submitting a redirect request that shares so few of the attributes of the original request.

²NIPPC does not take the time to explore the implications of business practices related to partial offers and remainder requests which might allow the customer to change the initial quantity as well.

NIPPC and RNW also note that BPA and customers are currently engaged in TC-27 which will substantially change how transmission service is awarded on an interim basis. We are concerned that implementing the proposed business practice change will have unknown or unintended consequences in the interim process under consideration in TC-27. One potential implication of adopting this customer proposal is that customers with requests in deferral status will attempt to redirect those requests to different POR/POD combinations where BPA may be able to offer new conditional firm service as it identifies and relieves constraints on conditional firm service. In this case, these customers would effectively move ahead of customers whose requests have not yet been studied but who will be funding the proposed conditional firm service analysis in the hopes that they will receive conditional firm service.

BPA Response 8

BPA appreciates the comments submitted by NIPPC and RNW for consideration.

BPA's response to questions submitted by PGE may be helpful in relation to some of the concerns outlined by NIPCC and RNW. Specifically, in Response 1, BPA clarifies that the customer would need to submit a new Redirect TSR matching the same parameters of the original Redirect TSR with the only change being the new Related Ref (while retaining the original queue time). This information should alleviate concerns regarding the potential for queue jumping.

The concept that only the Related Ref. would change in the resubmitted Redirect TSR is communicated in NewSun's proposed business practice language by the sentence that reads, "In the event a Parent Reservation has both a pending Deferral Request and Redirect Request, the Redirect Request will NOT reference the Parent Reservation but will instead be tied to the new Deferral TSR AREF number."

Please also see the Bonneville's Decision section regarding BPA initiatives.

D. PowerEx

Powerex appreciates the opportunity to provide comments on the customer proposed revisions to the Deferral of Transmission Service Business Practice. After reviewing the posted materials and participating in the stakeholder workshop held on June 30th, Powerex does not support advancing these revisions at this time.

The workshop surfaced a number of substantive questions that remain unresolved, particularly regarding the scope of the proposed changes and their potential impacts on BPA's operations, related industry systems, and established industry standards. Powerex, as well as other customers, requested that BPA conduct and share a comprehensive impact assessment before this proposal proceeds further. The assessment should also include an analysis of the costs associated with implementing the proposed changes, including any system modifications or operational adjustments required by BPA. Absent that analysis, stakeholders are not in a position to fully evaluate the merits of the revisions or assess their broader implications. Moving forward without this foundational work would be premature.

As part of that assessment, Powerex specifically requests that BPA address the proposal's consistency with NAESB standards. It is important that BPA outline the applicable standards, any changes that may be required to those standards, and any deviations BPA may need to undertake in order to implement the proposal. Based on Powerex's understanding from the stakeholder workshop, the proposal would effectively break an established parent-child transaction relationship, leaving orphaned redirects that may face issues with start time alignment to the parent transaction. These types of scenarios raise important questions about NAESB conformance that BPA should analyze and present to stakeholders, as this is a critical input to any informed evaluation of the proposal.

Powerex looks forward to engaging in a future workshop on this topic after reviewing BPA's impact assessment. Once that information is available, customers will be better positioned to provide more comprehensive comments and weigh the potential benefits and disadvantages of the proposed revisions.

BPA Response 9

BPA appreciates the comments provided by PowerEx for consideration.

Comments regarding an additional call or workshop on this topic and alignment with NAESB standards are addressed in Bonneville's Decision section.

BPA's response to questions submitted by PGE address impacts to BPA operations and the operational adjustments that would be necessary for BPA to implement adoption of the proposal. Specifically, in Response 1, BPA clarifies that the customer would need to submit a new Redirect TSR matching the same parameters of the original Redirect TSR with the only change being the new Related Ref. If the new Redirect TSR start/stop times do not match the original Redirect TSR, BPA would consider it a "new" Redirect TSR and it would receive a new OASIS queue time.

E. Bonneville's Decision

Bonneville declines to adopt NewSun's business practice proposal.

Customers are currently able to defer the start time of a request under the Deferral of Service Business Practice. Separately, customers are currently able to redirect the POR, the POD, or both under the Redirect of Transmission Service Business Practice. However, in both cases, a new queue time is required.

The NewSun proposal is designed to allow a deferral to carry forward an existing pending Redirect TSR. NAESB standards do not envision a deferral that carries an existing Redirect TSR forward with it. As a result, OASIS functionality does not allow it. Further, OASIS functionality does not allow any party to change the Parent association (*i.e.*, the Related Ref) of a submitted Redirect TSR.

In order to implement NewSun's proposal, a customer that chooses to submit a Deferral TSR against a reservation with a pending Redirect TSR must instead withdraw the existing Redirect TSR and must submit a new Redirect TSR (and a new Data Exhibit) against the new Deferral reservation. The new Redirect TSR must use the same attributes as the original Redirect TSR, including the POR/POD and start/stop times. The only thing that would be different is the Related Ref which would reference the Deferral AREF. BPA as the Transmission Provider would then need to manually override the queue time of the new Redirect TSR to match the original Redirect TSR.

With that in mind, NewSun's proposal does not reduce workload on the part of the customer. The workload for BPA would increase under NewSun's proposal, not decrease. Implementation of NewSun's proposal would require BPA to coordinate and track the resubmitted Redirect TSR, manually verify the resubmittal has no change other than the Related Ref, and specifically that the duration of the resubmitted Redirect TSR falls within the start/stop time of the new Deferral Reservation. Further, BPA would then need to manually override the queue time of the resubmitted Redirect TSR to align with that of the first Redirect TSR.

Because the start and stop time of the new Redirect TSR would be unchanged from the original Redirect TSR, NewSun's proposal may result in the loss of Reservation Priority consideration of the new Redirect TSR. This is because the stop time of the new Redirect TSR will no longer align with the Deferral stop time. If the stop time of the new Redirect TSR were to be adjusted in order to preserve Reservation Priority consideration, this may result in queue jumping, which BPA does not support.

Because the start/stop time of the new Redirect TSR must fall within the start/stop time of the new Deferral, this limits how often this process could be applied. In practice, there are few opportunities where this approach would actually allow the existing Redirect TSR to retain their existing queue time, which is the purpose of the proposal.

At this time, customers are not able to defer a reservation while simultaneously retaining an existing Redirect TSR in alignment with NAESB standards WEQ-001.9.7.1.1.

BPA does not support creation of a policy that would require manual steps to work around established industry standards and NAESB/OASIS functionality. Should changes to industry

standards occur that generate updates to OASIS functionality, such workaround processes would not be required.

Generally, should BPA initiate a modification, BPA would hold workshops to fully explore the option with stakeholders prior to making the decision whether to implement and, if so, BPA would then follow up by proposing business practice language through Bonneville's Business Practice Process that fully describes implementation processes and requirements.

Workshops would include information requested by participants to aid in their consideration as well as identification of potential impacts to BPA initiatives active at that time.