

February 6, 2026

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

RE: Comments on Deferral of Transmission Service (Extensions for Commencement of Service) Business Practice

NewSun Energy Transmission Company LLC (“NSET”) submits these comments on Bonneville Power Administration’s (“BPA”) proposed revision (version 24) of its Deferral of Transmission Service Business Practice (“BP”). BPA states that its proposed revisions are for clarification, but NSET takes this opportunity to highlight again for BPA an issue regarding this BP that requires revision. NSET previously raised this issue within the context of the TC-27 process and BPA’s “pause” in processing transmission requests. Specifically, we request that BPA revise 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. 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