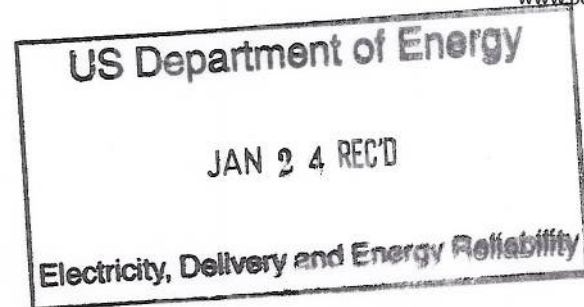


January 24, 2011

Odessa Hopkins  
Office of Electricity Delivery &  
Energy Reliability  
OE-20, Room 6H-034  
U.S. Department of Energy  
1000 Independence Ave., S.W.  
Washington, DC 20585



**Re: Application of SESCO Enterprises Canada, Ltd. for Renewal of Authority to Transmit Electric Energy to Canada**

Dear Ms. Hopkins:

Pursuant to 10 C.F.R. § 205.300, *et seq.* of the regulations of the Department of Energy, enclosed for filing on behalf of SESCO Enterprises Canada, Ltd. ("SESCO Canada") is an original and 15 copies of an Application for Renewal of Authority to Transmit Electric Energy to Canada. Additionally, please find enclosed a check for the cost of the renewal application in the amount of \$500 payable to the Treasurer to the United States.

Please date-stamp and return with our messenger the two (2) additional copies of the renewal application enclosed. Should you have any questions, please contact the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Carol A. Smoots".

Carol A. Smoots, Esq.

Nidhi J. Thakar, Esq.

Perkins Coie LLP

700 13th Street NW

Suite 600

Washington, DC 20005

Phone: (202) 434-1601

Fax: (202) 654-9146

Email: csmoots@perkinscoie.com

nthakar@perkinscoie.com

**Attorneys for SESCO Enterprises Canada, Ltd.**

Enclosures

**UNITED STATES OF AMERICA  
BEFORE THE  
DEPARTMENT OF ENERGY  
OFFICE OF FOSSIL ENERGY**

**SESCO ENTERPRISES CANADA, LTD.        )        DOCKET NO. EA-297-A**

**APPLICATION OF SESCO ENTERPRISES CANADA, LTD.  
FOR RENEWAL OF AUTHORITY  
TO TRANSMIT ELECTRIC ENERGY TO CANADA**

Pursuant to section 202(e) of the Federal Power Act ("FPA"), 16 U.S.C. § 824a(e) and 10 C.F.R. § 205.300, et seq., SESCO Enterprises Canada, Ltd. ("SESCO Canada") hereby submits this application for a five-year extension of its blanket authorization to export electricity from the United States to Canada ("renewal application"). The Department of Energy ("DOE") previously granted SESCO Canada authorization to export electric energy as a power marketer on May 17, 2006 in Order No. EA-297-A ("2006 Order"). SESCO Canada requests that this renewal application be made effective no later than May 17, 2011, the date on which its current authorization to export electricity from the United States to Canada expires, to prevent any lapse in authority.

**I.        DESCRIPTION OF APPLICANT**

SESCO Canada is a Delaware limited company with its principal place of business in East Brunswick, New Jersey. SESCO Canada is engaged in the marketing of electric power at wholesale, as well as the physical and financial trading of other energy products. SESCO Canada does not own any electric generation or transmission facilities, nor is it affiliated with any entity that does. SESCO Canada does not hold a franchise or service territory for the transmission, distribution or sale of electric power. The U.S. Federal Energy Regulatory Commission ("FERC") authorized SESCO Canada to engage in the wholesale sales of electric power and capacity at market-based rates under Docket No. ER04-1194-000 issued on November 1, 2004. A copy of this order is attached as Exhibit G.



## II. COMMUNICATIONS

Communications regarding this application should be addressed to:

Michael Schubiger  
Chief Executive Officer  
SESCO Enterprises Canada, Ltd.  
2 Tower Center  
Suite 1202  
East Brunswick, NJ 08816  
Phone: (732) 516-1639  
Fax: (732) 516-1636  
Email: mschubiger@sescollc.com

Carol A. Smoots, Esq.  
Nidhi J. Thakar, Esq.  
Perkins Coie LLP  
700 13th Street, NW  
Suite 600  
Washington, DC 20005  
Phone: (202) 434-1601  
Fax: (202) 654-9146  
Email: csmoots@perkinscoie.com  
nthakar@perkinscoie.com

## III. JURISDICTION

There is no Federal, State, or local government agency in the United States that has jurisdiction over the actions to be taken under the specific export authorization sought in this Application.

## IV. TECHNICAL DISCUSSION OF PROPOSED AUTHORIZATION

Section 202(e) of the Federal Power Act ("FPA") and the DOE's regulations provide that exports should be allowed unless the proposed export would impair the sufficiency of electric power supply within the United States or would tend to impede the coordinated use of the United States power supply network. 16 U.S.C. §824a(e). SESCO Canada seeks blanket authority to transmit electric power to Canada as a power marketer. SESCO Canada has no electric power supply system on which the proposed exports could have a reliability, fuel use or system stability impact. SESCO Canada also has no obligation to serve native load usually associated with a franchised service area, and, thus, the exports proposed by SESCO Canada will not impair its ability to meet current and prospective power supply obligations.

SESCO Canada will purchase power to be exported from a variety of sources such as power marketers, independent power producers, or U.S. electric utilities and federal power marketing entities as those terms are defined in Sections 3(22) and 3(19) of the FPA. By definition, such power is surplus to the system of the generator and, therefore, the electric power that SESCO Canada will export on either a firm or interruptible basis will not impair the sufficiency of the electric power supply within the U.S. *See Enron Power Marketing, Inc.* Order EA-102 (1996).

SESCO Canada will make all necessary commercial arrangements and will obtain any and all other regulatory approvals required in order to schedule and deliver and

power exports. All of the electricity exported by SESCO Canada will be transmitted pursuant to arrangements with utilities that own and operate existing transmission facilities and will be consistent with the export limitations and other terms and conditions contained in the existing Presidential Permits and electricity export authorizations associated with these transmission facilities as shown in Exhibit C. SESCO Canada will schedule its transactions with the appropriate balancing authority areas in compliance with the reliability criteria standards and guidelines established by the North American Electric Reliability Corporation ("NERC") and its member regional councils in effect at the time of export.

In previous orders granting export authorization to electric power marketers, DOE declined to rigidly apply the information filing requirements contained in its regulations and instead used a flexible approach which takes into consideration the unique nature of power marketers, the requirements of FERC Order No. 888 and previously authorized export limit of cross-border facilities. *See e.g. NorAm Energy Services, Inc.*, Order No. EA-105-CN (Aug. 16, 1996); *MidCon Power Services Corp.*, Order No. EA-114 (July 15, 1996); *USGen Power Services*, No. EA-112 (June 27, 1996); *CNG Power Services Corp.*, Order No. EA-110 (June 20, 1996); *North American Energy Conservation, Inc.*, Order No. EA-103 (May 30, 1996). These same considerations demonstrate that the exports proposed by SESCO Canada will not impair or tend to impede the sufficiency of electric supplies in the U.S. or the regional coordination of electric utility planning or operations.

Finally, SESCO Canada requests that DOE conclude that the authorization sought under this application qualifies for a categorical exclusion under the National Environmental Policy Act of 1969, and, thus, this application would not require the preparation of either an environmental impact statement or environmental assessment. DOE previously made this finding in its 2006 Order for SESCO Canada, *see* 2006 Order at 5. Further, any power exports scheduled by SESCO Canada under the requested authorization would occur over existing international transmission lines pursuant to authority identical to that which was previously granted to the company in the 2006 Order.

## **V. PROPOSED PROCEDURES**

SESCO Canada proposes to export electricity through the existing transmission facilities at the border between Canada and the U.S. as described and identified in Exhibit C. Further, SESCO Canada intends to comply with the applicable requirements of FERC, the NERC, and the export limitations associated with each facility. SESCO Canada also commits to furnish quarterly reports to DOE within 30 days following each calendar quarter showing the gross amount of electricity delivered, the consideration received in return for each month of the previous quarter, and the maximum hourly rate of transmission across the U.S. border to Canada. SESCO Canada seeks a continuance of its blanket authorization for exports for a minimum period of five years, which may be extended upon further application to DOE.



## **VI. REQUIRED EXHIBITS**

The following information is provided pursuant to the required exhibits as set forth in DOE regulations 10 C.F.R. § 205.303.

- Exhibit A: Not applicable. There are no specific agreements at this time under which electricity is to be transmitted for export. Thus, no agreements have been included with this application.
- Exhibit B: A legal opinion of Carol A. Smoots, Esq. of Perkins Coie LLP, counsel to SESCO Canada, is included.
- Exhibit C: List of transmission facilities to be used for any exports undertaken pursuant to the requested authorization is included.
- Exhibit D: Not applicable. The applicant resides in the U.S., so an irrevocable power of attorney is not required.
- Exhibit E: Not applicable. There are no existing contacts or relationships between SESCO Canada and another corporate entity that relate to the control or fixing of rates for the purchase, sale or transmission of electric energy.
- Exhibit F: Not applicable. There are no operating procedures regarding available capacity and energy.
- Exhibit G: A copy of the Order issued by FERC granting SESCO Canada authorization to engage in the wholesale sales of electric power and capacity at market-based rates under Docket No. ER04-1194-000 issued on November 1, 2004.

## **VII. CONCLUSION**

WHEREFORE, SESCO Canada respectfully requests that DOE grant this application for continued blanket authorization to export power from the United States to Canada with such authorization to be effective as of the date of the expiration of SESCO Canada's current authorization, May 17, 2011.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Nidhi J. Thakar", written over a horizontal line.

Carol A. Smoots, Esq.

Nidhi J. Thakar, Esq.

Perkins Coie LLP

700 13th Street, NW

Suite 600

Washington, DC 20005

Phone: (202) 434-1601

Fax: (202) 654-9146

Email: [csmoots@perkinscoie.com](mailto:csmoots@perkinscoie.com)

[nthakar@perkinscoie.com](mailto:nthakar@perkinscoie.com)

January 24, 2011

**EXHIBIT A**

**Not Applicable**

## **EXHIBIT B**

### **Legal Opinion of Counsel**





700 Thirteenth Street, N.W., Suite 600

Washington, D.C. 20005-3960

PHONE: 202.654.6200

FAX: 202.654.6211

www.perkinscoie.com

January 24, 2011

U.S. Department of Energy  
Office of Fossil Energy  
1000 Independence Avenue, SW  
Washington, D.C. 20585-0340

**Re: Application of SESCO Enterprises Canada, Ltd. for Authority to Transmit  
Electric Energy to Canada**

Dear Madam Secretary:

Pursuant to Sections Section 205.303(b) of the regulations of the Department of Energy, I hereby provide a legal opinion regarding the corporate powers of SESCO Enterprises Canada, Ltd. ("SESCO Canada") to export electricity to Canada. I have examined the Certificate of Incorporation of SESCO Canada, and based on my review of these documents, it is my opinion that the proposed importation and exportation of electricity is within the corporate powers of SESCO Canada, subject to Section 202(e) of the Federal Power Act, 16 U.S.C. § 824a(e). Additionally, SESCO Canada has taken the necessary steps to comply with all applicable Federal and State laws in connection with the actions to be undertaken pursuant to this application.

Please contact the undersigned should you have any questions regarding this opinion.

Sincerely,

Carol A. Smoots, Esq.

Perkins Coie LLP

700 Thirteenth Street, N.W.

Suite 600

Washington, D.C. 20005

csmoots@perkinscoie.com

Phone: (202) 654-6203

Fax: (202) 654-9133

**Attorney for**

**SESCO Enterprises Canada, Ltd.**

## **EXHIBIT C**

### **List of Transmission Facilities to be Used for Any Exports**

### Authorized Export Points

Owner	Location	Voltage	Presidential Permit No.
Basin Electric	Tioga, ND	230 kV	PP-64
Boise Cascade	International Falls, MN	115 kV	PP-96
	International Falls, MN	6.6 kV	PP-39
Bonneville Power Administration	Blaine, WA	2-500 kV	PP-10
	Nelway, WA	230-kV	PP-36
	Nelway, WA	230-kV	PP-46
Eastern Maine Electric Coop.	Calais, ME	69-kV	PP-32
International Transmission Co.	St. Clair, MI	345-kV	PP-230
	Marysville, MI	230-kV	PP-230
	Detroit, MI	230-kV	PP-230
	St. Clair, MI	345-kV	PP-230
Joint Owners of Highgate Project	Franklin, VT	120-kV	PP-82
Long Sault, Inc.	Massena, NY	2-115-kV	PP-24
Maine Electric Power Co.	Houlton, ME	345-kV	PP-43
Maine Public Service Co.	Limestone, ME	69-kV	PP-12
	Fort Fairfield, ME	69-kV	PP-12
	Aroostook County, ME	138-kV	PP-29
	Madawaska, ME	2-69-kV	PP-29
Minnesota Power, Inc.	International Falls, MN	115-kV	PP-78
Minnkota Power Coop, Inc.	Roseau County, MN	230-kV	PP-61
New York Power Authority	Ft. Covington, NY	765-kV	PP-56
	Massena, NY	2-230-kV	PP-25
	Niagara Falls, NY	2-345-kV	PP-74
	Devils Hole, NY	230-kV	PP-30
Niagara Mohawk Power Corp.	Devils Hole, NY	230-kV	PP-190
Northern States Power Co.	Red River, ND	230-kV	PP-45
	Roseau County, MN	500-kV	PP-63
	Rugby, ND	230-kV	PP-231
Northern States/Xcel			
Vermont Electric Coop. Co.	Derby Line, VT	120-kV	PP-66
Vermont Electric Transmission Co.	Norton, VT	± 450-kV DC	PP-76

**EXHIBIT D**

**Not Applicable**



**EXHIBIT E**

**Not Applicable**

**EXHIBIT F**

**Not Applicable**

**EXHIBIT G**

**Letter Order Issued by FERC  
Granting SESCO Enterprises Canada, Ltd. Market-Based Rate Authorization  
Docket No. ER04-1194-000  
November 1, 2004**

109 FERC ¶ 61,128  
FEDERAL ENERGY REGULATORY COMMISSION  
Washington, D.C. 20426

November 1, 2004

In Reply Refer To:  
SESCO Enterprises Canada Ltd.  
Docket No. ER04-1194-000

McGuireWoods LLP  
Attn: Janice R. Moore, Esq.  
1050 Connecticut Avenue, N.W., Suite 1200  
Washington, D.C. 20036

Dear Ms. Moore:

1. On September 3, 2004, SESCO Enterprises Canada Ltd. (SESCO) filed an application for market-based rate authority, with an accompanying tariff. The proposed market-based rate tariff provides for the sale of capacity and energy at market-based rates. It also includes the Commission's market behavior rules.<sup>1</sup> SESCO's submittal, as discussed below, satisfies the Commission's standards for market-based rate authority and is accepted for filing, effective September 4, 2004, as requested.<sup>2</sup>
2. SESCO is a Delaware limited liability company whose principal place of business is Iselin, New Jersey. SESCO is primarily engaged in natural gas and electricity marketing. SESCO has two affiliates, SESCO Enterprises, LLC (SESCO LLC) and SESCO PJM Strategies, LLC (SESCO PJM). SESCO LLC is a power marketer with market-based rate authority.<sup>3</sup> SESCO LLC presently has a license to export energy to

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<sup>1</sup> *Investigation of Terms and Conditions of Public Utility Market-Based Rate Authorizations*, 105 FERC ¶ 61,218 (2003), *order on reh'g*, 107 FERC ¶ 61,175 (2004).

<sup>2</sup> Rate Schedule FERC No. 1, Original Sheet Nos. 1-3. Waiver of section 35.3 of the Commission's regulations is granted to allow for the effective date noted above.

<sup>3</sup> *SESCO Enterprises Canada Ltd.*, Docket No. ER03-295-000 (January 24, 2003) (unpublished letter order).



Canada.<sup>4</sup> SESCO and SESCO LLC have filed a joint application with the Department of Energy requesting that SESCO LLC's license to export energy to Canada be transferred to SESCO. SESCO states that SESCO PJM is a non-operating affiliate whose sole purpose is to provide employees (and their employee benefit plans) to its affiliates.

### **Procedural Matters**

3. Notice of SESCO's filing was published in the *Federal Register*, 69 Fed. Reg. 56,210 (2004), with comments, protests, and interventions due on or before September 24, 2004. None was filed.

### **Discussion**

#### **Market-Based Rate Authorization**

4. The Commission allows power sales at market-based rates if the seller and its affiliates do not have, or have adequately mitigated, market power in generation and transmission and cannot erect other barriers to entry. The Commission also considers whether there is evidence of affiliate abuse or reciprocal dealing.<sup>5</sup> As discussed below, we conclude that SESCO satisfies the Commission's standards for market-based rate authority.

5. In its order issued in *AEP Power Marketing, Inc., et al.*, 107 FERC & 61,018, *order on reh'g*, 108 FERC ¶ 61,026 (2004), the Commission adopted two indicative screens for assessing generation market power. SESCO states that neither it nor its affiliates owns or controls any generation facility. Accordingly, the Commission finds that SESCO satisfies the Commission's generation market power standard for the grant of market-based rate authority.

6. SESCO states that neither it nor any of its affiliates owns or controls any transmission facilities. Based on SESCO's representation, the Commission finds that

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<sup>4</sup> See Order No. EA-292, issued July 6, 2003 by the Office of Fossil Energy of the United States Department of Energy, wherein SESCO LLC received authorization to transmit electric energy to Canada.

<sup>5</sup> See, e.g., *Progress Power Marketing, Inc.*, 76 FERC ¶ 61,155 at 61,919 (1996), *Letter Order Approving Settlement*, 79 FERC ¶ 61,149 (1997); *Northwest Power Marketing Co., L.L.C.*, 75 FERC ¶ 61,281 at 61,899 (1996); accord *Heartland Energy Services, Inc., et al.*, 68 FERC ¶ 61,223 at 62,062-63 (1994).

SESCO satisfies the Commission's transmission market power standard for the grant of market-based rate authority.

7. SESCO states that neither it nor any of its affiliates owns or controls sites for the construction of new generation, interstate or intrastate natural gas pipelines or power transmission lines, or other essential resources or inputs that could be used to restrict market entry by competing power suppliers. Based on this representation, the Commission is satisfied that neither SESCO nor any of its affiliates can erect barriers to entry.

8. SESCO states that neither it nor any of its affiliates have a franchised service territory. Based on this representation, the Commission finds that SESCO satisfies the Commission's concerns with regard to affiliate abuse.

### **Other Waivers, Authorizations and Reporting Requirements**

9. SESCO requests the following waivers and authorizations: (1) waiver of Subparts B and C of Part 35 of the Commission's regulations requiring the filing of cost-of-service information, except as to sections 35.12(a), 35.13(b), 35.15 and 35.16; (2) waiver of Parts 41, 101 and 141 of the Commission's accounting and periodic reporting requirements; (3) abbreviated filings with respect to interlocking directorates under Part 45 of the Commission's regulations; and (4) blanket authorization under Part 34 of the Commission's regulations for all future issuances of securities and assumptions of liability.

10. The Commission will grant the requested waivers and authorizations consistent with those granted other entities with market-based rate authorizations.<sup>6</sup> Notwithstanding the waiver of the accounting and reporting requirements here, the Commission expects SESCO to keep its accounting records in accordance with generally accepted accounting principles.

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<sup>6</sup> It should be noted that the Commission is examining the issue of continued applicability of the waivers of its accounting and reporting requirements (18 C.F.R. Parts 41, 101 and 141) as well as continued applicability of the blanket authorization for the issuance of securities and the assumption of obligations and liabilities, (18 C.F.R. Part 34). See *Accounting and Reporting of Financial Instruments, Comprehensive Income, Derivatives and Hedging Activities*, Order No. 627, 67 Fed. Reg. 67,691 at P 23 and P 24 (October 10, 2002), FERC Stats. & Regs. ¶ 32,558 (2002).



11. Within 30 days of the date of the issuance of this order, any person desiring to be heard or to protest the Commission's blanket approval of issuances of securities or assumptions of liabilities by SESCO should file a motion to intervene or protest with the Federal Energy Regulatory Commission, 888 First Street, NE, Washington, D.C. 20426, in accordance with Rules 211 and 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. §§ 385.211 and 385.214 (2004).

12. Absent a request to be heard within the period set forth above, SESCO is hereby authorized to issue securities and assume obligations or liabilities as guarantor, indorser, surety, or otherwise in respect of any security of another person; provided that such issue or assumption is for some lawful object within the corporate purposes of SESCO, compatible with the public interest, and reasonably necessary or appropriate for such purposes.

13. Until further order of this Commission, the full requirements of Part 45 of the Commission's regulations, except as noted below, are hereby waived with respect to any person now holding or who may hold an otherwise proscribed interlocking directorate involving SESCO. Any such person instead shall file a sworn application providing the following information:

- (1) full name and business address; and
- (2) all jurisdictional interlocks, identifying the affected companies and the positions held by that person.

14. The Commission reserves the right to modify this order to require a further showing that neither the public nor private interests will be adversely affected by continued Commission approval of SESCO's issuances of securities or assumptions of liabilities, or by the continued holding of any affected interlocks.

15. Consistent with the procedures the Commission adopted in Order No. 2001, an entity with market-based rates must file electronically with the Commission an Electric Quarterly Report containing: (1) a summary of the contractual terms and conditions in every effective service agreement for market-based power sales; and (2) transaction information for effective short-term (less than one year) and long-term (one year or greater) market-based power sales during the most recent calendar quarter.<sup>7</sup> Electric

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<sup>7</sup> *Revised Public Utility Filing Requirements, Order No. 2001*, 67 Fed. Reg. 31,043 (May 8, 2002), FERC Stats. & Regs. ¶ 31,127 (2002). Required data sets for contractual and transaction information are described in Attachments B and C of Order No. 2001. The Electric Quarterly Report must be submitted to the

Quarterly Reports must be filed quarterly no later than 30 days after the end of the reporting quarter.<sup>8</sup> Accordingly, SESCO must file its first Electric Quarterly Report no later than 30 days after the first quarter SESCO's rate schedule is in effect.<sup>9</sup>

16. SESCO is directed to inform the Commission promptly of any change in status that would reflect a departure from the characteristics the Commission has relied upon in approving market-based pricing. These characteristics include, but are not limited to: (1) ownership of generating or transmission facilities or inputs to electric power production other than fuel supplies; or (2) affiliation with any entity not disclosed in the filing that owns generation or transmission facilities or inputs to electric power production, or affiliation with any entity that has a franchised service area.<sup>10</sup>

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Commission using the EQR submission System Software, which may be downloaded from the Commission's website at <http://www.ferc.gov/Electric/eqr/eqr.htm>.

<sup>8</sup> The exact filing dates for these reports are prescribed in 18 C.F.R. § 35.10b (2004).

<sup>9</sup> Failure to file an Electric Quarterly Report (without an appropriate request for extension), or failure to report an agreement in an Electric Quarterly Report, may result in forfeiture of market-based rate authority, requiring filing of a new application for market-based rate authority if the applicant wishes to resume making sales at market-based rates.

<sup>10</sup> The Commission issued a Notice of Proposed Rulemaking in Docket No. RM04-14-000 in which the Commission is proposing to amend its regulations and to modify the market-based rate authority of current market-based rate sellers to establish a reporting obligation for changes in status that apply to public utilities authorized to make wholesale power sales in interstate commerce at market-based rates. *Reporting Requirement for Changes in Status for Public Utilities with Market-Based Rate Authority*, 69 Fed. Reg. 61,180 (Oct. 15, 2004), FERC Stats. & Regs. ¶ 32,576 (2004). The change of status requirements outlined herein are subject to the outcome of the rulemaking.



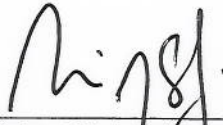
17. SESCO is directed to file an updated market power analysis within three years of the date of this order, and every three years thereafter. The Commission also reserves the right to require such an analysis at any intervening time.

By direction of the Commission.

Linda Mitry,  
Deputy Secretary.

## VERIFICATION

I, Michael Schubiger, having knowledge of the matters set forth in the above application by SESCO Enterprises Canada, Ltd. for Authorization to Transmit Electric Power to Canada, hereby verify that the contents of this application are true and correct to the best of my knowledge and belief.



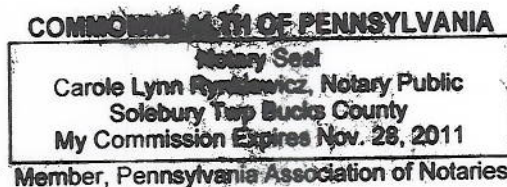
Michael Schubiger  
Chief Executive Officer

SUBSCRIBED AND SWORN BEFORE ME, this 14<sup>th</sup> day of January, 2011.



Notary Public

My Commission expires: 11-28-11



PERKINS COIELLP

1201 THIRD AVENUE, 40th FLOOR SEATTLE, WA 98101-3099

USTRE0425

CHECK  
NO.

1090936

INVOICE DATE	INVOICE NUMBER	INVOICE AMOUNT	PAYMENT AMOUNT
12/13/2010	30614696	500.00	500.00

DETACH AND RETAIN THIS STATEMENT

THE ORIGINAL DOCUMENT HAS A WHITE REFLECTIVE WATERMARK ON THE BACK. HOLD AT AN ANGLE TO VIEW. DO NOT CASH IF NOT PRESENT.

Perkins  
Coie1201 Third Avenue, 40th Floor  
Seattle, WA 98101-3099USBank  
1420 Fifth Avenue  
Seattle, WA 9810119 - 10  
1250DATE  
12/13/2010CHECK NO.  
1090936Amount  
\*\*\*\*\*\$500.00


PAY FIVE HUNDRED AND 00/100 DOLLARS

PAY TO  
ORDER OF:

U.S. Treasury

PERKINS COIE

VOID IF NOT NEGOTIATED WITHIN SIX MONTHS



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