

UNITED STATES OF AMERICA
BEFORE THE DEPARTMENT OF ENERGY
OFFICE OF ELECTRIC DELIVERY AND ENERGY RELIABILITY

TransAlta Energy Marketing (U.S.) Inc.

Docket No. EA-216-E

**APPLICATION OF
TRANSALTA ENERGY MARKETING (U.S.) INC.
FOR RENEWAL OF AUTHORIZATION
TO TRANSMIT ELECTRIC ENERGY TO CANADA**

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3 February 2021

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Pursuant to Section 202(e) of the Federal Power Act ("FPA"), 16 U.S.C. § 824(e) (2006), and Part 205, Subpart W of the U.S. Department of Energy's regulations, 10 C.F.R. § 205.300, et seq., TransAlta Energy Marketing (U.S.) Inc. ("TEMUS" or "Applicant") hereby requests renewal of its authorization to transmit electric energy from the United States to Canada for a period of five years. In support of this Application, TEMUS respectfully states as follows:

**I.
DESCRIPTION OF THE APPLICANT**

The exact legal name of the Applicant is TransAlta Energy Marketing (U.S.) Inc. TEMUS is a Delaware corporation with its principal place of business at 913 Big Hanaford Road, Centralia, Washington 98531-9111, and is currently authorized to do business in numerous states.¹

On August 31, 1999, DOE issued Order No. EA 216 authorizing TEMUS to transmit electric energy from the United States to Canada as a power marketer.² In

¹ District of Columbia, Maryland, Nevada, New York, Oregon, Texas, Washington, Idaho, Utah, Colorado, Wyoming, New Mexico, Connecticut, Illinois, California, Minnesota, Michigan, Arizona, Maine, Massachusetts, New Hampshire, West Virginia, Ohio, Mississippi, Pennsylvania, Rhode Island, Louisiana, Virginia, Indiana, Wisconsin, and Missouri.

² *TransAlta Energy Marketing (U.S.) Inc.*, No. EA-216 (August 31, 1999).

2001, 2006, 2011, and 2016 in Order Nos. EA-216-A,³ EA-216-B,⁴ EA-216-C,⁵ and EA-216-D,⁶ DOE renewed the TEMUS authorization to export electric energy to Canada for five-year terms. TEMUS' current authorization to export electric energy to Canada expires on May 17, 2021.

TEMUS is a power marketer with authorization from the Federal Energy Regulatory Commission ("FERC") to market electric energy and capacity at wholesale pursuant to market-based rate authorization granted by letter order issued on June 25, 1998, in FERC Docket No. ER98-3184-000. TEMUS is an indirect subsidiary of TransAlta Corporation ("TAC"), a publicly traded Canadian corporation with headquarters in Calgary, Alberta.

TAC owns a 100% interest in TransAlta Energy Marketing Corp., a Canadian business corporation, which was granted market-based rate authority by FERC on April 30, 2009, in FERC Docket No. ER09-884-000.

TAC indirectly owns a 100% interest in TransAlta Centralia Generation LLC ("TCG"), a Washington limited liability company with a coal-fired electric generation facility located in Centralia, Washington. TCG is an exempt wholesale generator ("EWG") pursuant to a letter order issued by FERC on February 25, 2000, in FERC Docket No. EG00-49-000, and TCG holds market-based rate sales authority as granted December 16, 1999 in FERC Docket No. ER00-494-000.

In addition, TAC indirectly holds a 100% interest in TransAlta Wyoming Wind LLC ("TWW"), a Delaware limited liability company with a wind-powered electric

³ *TransAlta Energy Marketing (U.S.) Inc.*, No. EA-216-A (August 16, 2001).

⁴ *TransAlta Energy Marketing (U.S.) Inc.*, No. EA-216-B (May 17, 2006).

⁵ *TransAlta Energy Marketing (U.S.) Inc.*, No. EA-216-C (May 17, 2011) ("Order No. EA-216-C").

⁶ *TransAlta Energy Marketing (U.S.) Inc.*, No. EA-216-D (April 29, 2016).

generating facility located in Uinta County, Wyoming. TWW is an EWG pursuant to a letter order issued by FERC on August 5, 2003, in FERC Docket No. EG03-75-000,⁷ and TWW holds market-based rate sales authority originally granted on September 10, 2003 in Docket No. ER03-1025.⁸

TAC also indirectly holds a 100% interest in Lakeswind Power Partners, LLC (“Lakeswind”), a Delaware limited liability company with a wind-powered electric generating project located in Clay, Becker and Otter Tail Counties, Minnesota. Lakeswind is an EWG pursuant to a letter order issued by FERC on January 9, 2014 in FERC Docket No. EG14-12-000,⁹ and was granted market-based rate authorization by FERC on November 4, 2013 in Docket No. ER13-2386-000.¹⁰

TAC also indirectly holds a 100% interest in Skookumchuck Dam, LLC, a Washington limited liability company with a 1 MW hydroelectric facility located in the vicinity of Centralia, Washington. Skookumchuck Dam is self-certified as a Qualifying Facility in FERC Docket No. QF05-1-000.

TAC also indirectly holds a 100% interest in Big Level Wind LLC (“Big Level”), a Delaware limited liability company with a wind-powered electric generating facility

⁷ See *FPL Energy Wyoming, LLC*, 104 FERC ¶ 62,088 (2003) (granting EWG status to TWW’s predecessor, FPL Energy Wyoming, LLC).

⁸ See *FPL Energy Wyoming, LLC*, Docket Nos. ER03-1025-000 and ER03-1025-001 (Sept. 10, 2003) (letter order granting MBR authority to TWW’s predecessor, FPL Energy Wyoming, LLC). On January 8, 2014, as amended on January 31, 2014, TWW filed a revised market-based rate tariff reflecting the name change of FPL Energy Wyoming, LLC to TransAlta Wyoming Wind LLC. On March 27, 2014, FERC issued a letter order accepting the notice of succession and tariff revisions. *TransAlta Wyoming Wind LLC*, Docket Nos. ER14-963-000 and ER14-963-001 (Mar. 27, 2014) (letter order accepting notice of succession and tariff revisions).

⁹ See *Burgess Biopower LLC, et al.*, Docket Nos. EG14-1-000, *et al.* (Jan. 9, 2014) (unpublished blanket letter order providing notice of effectiveness of EWG status for Lakeswind in Docket No. EG14-12-000).

¹⁰ *Lakeswind Power Partners, LLC*, ER13-2386-000 (Nov. 4, 2013) (unpublished letter order granting market-based rate authority).

located in Potter County, Pennsylvania. Big Level is an EWG pursuant to a letter order issued by FERC on May 8, 2019 in FERC Docket No. EG19-58-000,¹¹ and was granted market-based rate authorization by FERC on August 27, 2018 in Docket No. ER18-1984-000.¹²

TAC also indirectly holds a 100% interest in Antrim Wind Energy LLC (“Antrim”), a Delaware limited liability company with a wind-powered electric generating facility located in Hillsborough County, New Hampshire. Antrim is self-certified as a QF in FERC Docket No. QF19-1361-000,¹³ and was granted market-based rate authorization by FERC on June 19, 2019 in Docket No. ER19-1889-000.¹⁴

TAC also indirectly holds a 100% interest in Ada Cogeneration LLC (“Ada”), a Delaware limited liability company with a combined-cycle, natural gas-fired cogeneration facility located in Kent County, Michigan. Ada is self-certified as a QF in FERC Docket No. QF87-529-007.¹⁵

Further, TAC also holds a 49% passive interest in Skookumchuck Wind Energy Project, LLC (“Skookumchuck Wind”), through its indirect subsidiary, TA Skookumchuck Wind Holdings LLC, a Washington limited liability company with a wind-powered electric generating facility located in Lewis and Thurston Counties, Washington.

¹¹ *Hillcrest Solar I, LLC, et al.*, Docket Nos. EG19-54-000, et al. ((May 8, 2019) (unpublished blanket letter order providing notice of effectiveness of EWG status for Big Level Wind LLC in Docket No. EG14-12-000).

¹² *Big Level Wind LLC*, Docket No. ER18-1948-000 (Aug. 27, 2018) (unpublished letter order granting *market-based* rate authority).

¹³ *Antrim Wind Energy LLC*, Form 566, Docket No. QF19-1361-000 (filed July 12, 2019).

¹⁴ *Antrim Wind Energy LLC*, Docket No. ER19-1889-000 (June 19, 2019) (unpublished letter order granting *market-based* rate authority).

¹⁵ *Ada Cogeneration LLC*, Docket No. QF87-529-007 (Jan. 19, 1988) (Order granting application for certification as QF in QF87-529-000).

Skookumchuck Wind is self-certified as an EWG in FERC Docket No. EG20-17-000,¹⁶ and was granted market-based rate authorization by FERC on December 16, 2019 in Docket No. ER20-280-000.¹⁷

None of TEMUS' affiliates currently holds or is seeking authorization to export electricity to Canada.

II. COMMUNICATIONS

Communications regarding this application should be addressed to the following:

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¹⁶ *Poseidon Solar, LLC, et al.*, Docket No. EG20-1-000, *et al.* (Jan. 15, 2020) (unpublished blanket letter order providing notice of effectiveness of EWG status for Skookumchuck Wind Energy Project, LLC in Docket No. EG20-17-000).

¹⁷ *Skookumchuck Wind Energy Project, LLC*, Docket No. ER20-280-000 (Dec. 16, 2019) (unpublished letter order granting market-based rate authority).

III. **JURISDICTION**

The authority requested of DOE by TEMUS is a necessary condition for exporting under section 202(e) of the FPA.

TEMUS has obtained or will obtain any and all necessary Canadian federal and provincial authorizations to effect any proposed export that involves electricity sourced in Canada. No other known federal, state or local government has jurisdiction over the actions to be taken under the authority sought in this Application.

IV. **RENEWAL AUTHORIZATIONS AND TECHNICAL DISCUSSION**

By this Application, TEMUS seeks authorization to continue to transmit electric energy, on either a firm or interruptible basis, to Canada. TEMUS desires to continue its exports of electrical energy acquired from U.S. generating sources to Canada over international electric transmission facilities. The Presidential Permits under which the relevant border facilities were constructed and maintained, and details related thereto, are set forth in Appendix C.

Pursuant to Section 202(e) of the FPA, before DOE grants authorization to export electricity, it first evaluates the impact of the export on the reliability of the U.S. electric system. DOE approves an application to export electricity unless it finds that "the proposed transmission would impair the sufficiency of electric supply within the United States," or that "the proposed transmission ... would impede or tend to impede the coordination in the public interest of facilities subject to the jurisdiction of the Commission." 16 U.S.C. § 824(e). In applying these two criteria to requests for export authorizations submitted by electric power marketers such as TEMUS, DOE has

declined to follow a rigid application of the information filing requirements set forth in DOE's regulations and instead has used a flexible approach to account for the unique nature of power marketers.¹⁸

TEMUS does not own any electric generation or transmission facilities and, as a power marketer, does not hold a franchise or service territory or native load obligation. Moreover, none of TEMUS' affiliates owns any electric transmission facilities other than generator interconnection facilities¹⁹ and TEMUS is not affiliated with an entity that holds a franchise or service territory. Thus, TEMUS has no "transmission system" of its own on which power exports could have a reliability or stability impact.

Specifically, with respect to the first criterion used to analyze applications to export electricity, TEMUS is a power marketer that will export electricity purchased from electric utilities, federal power marketing agencies, qualifying cogeneration and small power production facilities, independent power producers, and other sellers. As DOE has recognized, the "power purchased by a power marketer is, by definition, surplus to the needs of the selling entities" and "[w]ith no native load obligations, the power

¹⁸ See, e.g., *Morgan Stanley Capital Group Inc.*, No. EA-185-A-CN (Aug. 14, 2000); *NorAm Energy Servs., Inc.*, No. EA-105-CN (Aug. 16, 1996); *MidCon Power Servs. Corp.*, No. EA-114 (July 15, 1996); *USGen Power Servs.*, No. EA-112 (June 27, 1996); *CNG Power Servs. Corp.*, No. EA-110 (June 20, 1996); *Destec Power Servs., Inc.*, No. EA-113 (May 31, 1996).

¹⁹ TEMUS notes, however, that an affiliate, TransAlta Generation Partnership ("TGP"), owns transmission facilities located entirely within the Province of Alberta, Canada. TGP's facilities are subject to the control of the Alberta Electric System Operator ("AESO"), an Independent System Operator that provides open access and non-discriminatory transmission service pursuant to the AESO transmission tariff, mitigating any vertical market power concerns. See, e.g., *ENMAX Energy Marketing, Inc.* 109 FERC ¶ 61,143 (2004) (accepting updated market power analysis for filing and acknowledging that the AESO provides open access and non-discriminatory transmission service); *TransAlta Enterprises Corporation*, 75 FERC ¶ 61,268 at 61,875 (1996) (concluding that the general form of open access transmission arrangements in Alberta effectively mitigate any transmission market power concerns and meet the general principles of transmission comparability in Order No. 888) and *ENMAX Energy Marketing, Inc.*, Docket No. ER01-2508-003 (Feb. 12, 2009) (letter order accepting updated market power analysis and acknowledging that the AESO provides open access and nondiscriminatory transmission service).

marketer is free to sell its power portfolio on the open market domestically or as an export."²⁰ Thus, an export of electricity "occurring under such circumstances" would not impair the sufficiency of electric supply within the U.S.²¹

DOE has interpreted the second criterion used to analyze applications to export electricity "primarily as an issue of the operational reliability of the domestic electric transmission system."²² As noted above, TEMUS does not own or control any electric power supply system in the United States. Additionally, in making the necessary commercial arrangements and obtaining transmission capacity necessary to export electricity under the authorization requested herein, TEMUS will comply with existing industry procedures for obtaining transmission capacity, including reserving transmission service in accordance with FERC's Open-Access Same-Time Information System ("OASIS") and scheduling delivery of the export with the appropriate Regional Transmission Organization(s) or Independent System Operator(s) and/or Balancing Authority areas.

TEMUS will schedule its exports from the U.S. in compliance with all applicable reliability criteria, standards and guides as are set out by the North American Electricity Reliability Corporation ("NERC") (or any successor organization), the North American Energy Standards Board (or any successor organization) and regional reliability councils and as applied by U.S. transmission providers.

²⁰ Order No. EA-216-D at 2.

²¹ *Id.* See also *Powerex Corp.*, No. EA-171-E at 6-7 (Sept. 10, 2020).

²² Order No. EA-216-D at 2.

V.
CONSISTENCY WITH LAWS

Authorization of the exports proposed by TEMUS is consistent with the United States–Mexico–Canada Agreement (“USMCA”), the replacement to NAFTA, and U.S. energy policy and will foster development of a more efficient and competitive North American energy market. TEMUS will conduct all operations pursuant to this Authorization in accordance with the provisions of the FPA and pertinent rules, regulations and orders adopted or issued thereunder, and in conformity with the reliability criteria, standards and guidelines of the NERC, regional reliability councils, and Balancing Authorities, including any applicable regional transmission organizations or independent system operators. Compliance with these statutes, rules, regulations, and orders will ensure that the proposed transmission will not impede or tend to impede the regional coordination of electric utility planning or operation.

TEMUS believes that DOE is not required to conduct an environmental assessment or an environmental impact statement in connection with this Application and that DOE’s approval of this Application is eligible for categorical exclusion under Appendix B to Subpart D, paragraph B4.2 of the revised DOE regulations implementing the National Environmental Policy Act of 1969.

VI.
PROCEDURAL ISSUES

If required by DOE, TEMUS agrees to abide by general conditions consistent with those set forth in TEMUS' existing DOE electricity export authorizations, as

applicable.²³ TEMUS respectfully submits that it satisfies the requirements of Section 202(e) of the FPA and Part 205, Subpart W of DOE's regulations applicable to applications for authorization to transmit electric energy from the United States to Canada. TEMUS respectfully requests waiver of the requirement to file this application six months in advance of the authorization requested herein to allow issuance of an order renewing TEMUS' authorization to transmit electric energy to Canada on or before May 17, 2021, when TEMUS' current authorization expires. TEMUS also requests any additional waivers deemed necessary for DOE to issue the order requested herein.

VII. **EXHIBITS**

The following exhibits identified in the DOE's regulations are attached hereto as follows:

Exhibit A: Agreements

(Not Applicable)

Exhibit B: Legal Opinion of TEMUS' Counsel

Exhibit C: Transmission system information (submitted in lieu of maps)

Exhibit D: Irrevocable Limited Power of Attorney

(Not Applicable)

Exhibit E: Statement of any Corporate Relationship or Existing Contract which in any way Relates to Control or Fixing of Rates for the Purchase, Sale or Transmission of Electric Energy

(Not Applicable)

²³ *Id.* at 5-13.

Exhibit F: Operating Procedures Regarding Available Capacity and Energy

(Not Applicable)

Exhibit G: Verification

To the extent necessary, TEMUS requests a waiver of the requirement to provide the exhibits that are not applicable to this application, as noted above.

VIII. **CONCLUSION**

For the foregoing reasons, TEMUS respectfully requests that the Department of Energy issue an order renewing TEMUS' authorization to transmit electric energy to Canada for a period of five years, effective upon issuance of the order but no later than May 17, 2021.

Respectfully submitted,
/s/ Michael W. Brooks

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February 3, 2021

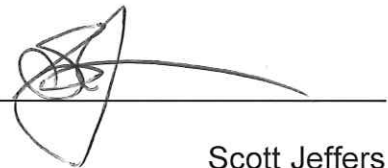
EXHIBIT B

Opinion of Legal Counsel

LEGAL OPINION

The following opinion is given in support of the Application of TransAlta Energy Marketing (U.S.) Inc. for Renewal of Authorization to Transmit Electric Energy to Canada, which was originally granted in Order No. EA-216 and renewed by Order Nos. EA-216-A, EA-216-B, EA-216-C, and EA-216-D, dated January 28, 2021.

- 1) I am a barrister and solicitor at law, authorized to practice law in the Province of Alberta.
- 2) I am Managing Director, Legal, Sustainability & Corporate Secretary for TransAlta Corporation, which is the ultimate parent company of TransAlta Energy Marketing (U.S.) Inc.
- 3) TransAlta Energy Marketing (U.S.) Inc. is duly incorporated, validly existing and in good standing as a corporation under the laws of the State of Delaware.
- 4) TransAlta Energy Marketing (U.S.) Inc. has full corporate power and authority to buy, sell, or act as a marketer in the sale and exportation of electric energy as requested in the Application.

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke, positioned above a solid horizontal line.

Scott Jeffers
Managing Director, Legal, Sustainability & Corporate Secretary
TRANSALTA CORPORATION

EXHIBIT C

Transmission System Information

International Electric Transmission Facilities for TEMUS Exports to Canada

Present Owner	Location	Voltage	Presidential Permit No.¹
Bangor Hydro-Electric Company	Baileyville, ME	345-kV	PP-89
Basin Electric Power Cooperative	Tioga, ND	230-kV	PP-64
Bonneville Power Administration	Blaine, WA Nelway, WA Nelway, WA	2-500-kV 230-kV 230-kV	PP-10 PP-36 PP-46
CHPE, LLC	Champlain, NY	±230-kV DC	PP-481 ²
Eastern Maine Electric Cooperative	Calais, ME	69-kV	PP-32
International Transmission Company	Detroit, MI Marysville, MI St. Claire, MI St. Claire, MI	230-kV 230-kV 230-kV 345-kV	PP-230 PP-230 PP-230 PP-230
ITC Lake Erie Connector	Erie County, PA	320-kV	PP-412 ³
Highgate Joint Owners	Highgate, VT	120-kV	PP-82-5
Long Sault, Inc.	Massena, NY	2-115-kV	PP-24
Maine Electric Power Company	Houlton, ME	345-kV	PP-43
Maine Public Service Company	Limestone, ME Fort Fairfield, ME Madawaska, ME Aroostook, ME	69-kV 69-kV 138-kV 2-69-kV	PP-12 PP-12 PP-29 PP-29
Minnesota Power, Inc.	International Falls, MN	115-kV	PP-78
Minnkota Power Cooperative	Roseau County, MN	230-kV	PP-61
Montana Alberta Tie Ltd.	Cut Bank, MT	230-kV	PP-305
New York Power Authority	Massena, NY Massena, NY Niagara Falls, NY	765-kV 2-230-kV 2-345-kV	PP-56 PP-25 PP-74

¹ These Presidential permit numbers refer to the generic DOE permit number and are intended to include any subsequent amendments to the permit authorizing the facility.

² These transmission facilities have been authorized but not yet constructed or placed into operation.

³ These transmission facilities have been authorized but not yet constructed or placed into operation.

	Devils Hole, NY	230-kV	PP-30
Niagara Mohawk Power Corp.	Devils Hole, NY	230-kV	PP-190
Northern States Power Company	Red River, ND Roseau County, MN Rugby, ND	230-kV 500-kV 230-kV	PP-45 PP-63 PP-231
Sea Breeze Olympic Converter LP	Port Angeles, WA	\pm 450-kV DC	PP-299 ⁴
TDI New England	Alburgh, VT	\pm 320-kV DC	PP-400 ⁵
Vermont Electric Power Co.	Derby Line, VT	120-kV	PP-66
Vermont Electric Transmission Co.	Norton, VT	\pm 450-kV DC	PP-76

⁴ These transmission facilities have been authorized but not yet constructed or placed into operation.

⁵ These transmission facilities have been authorized but not yet constructed or placed into operation.

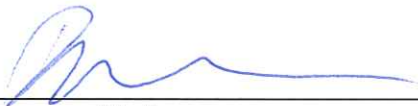
EXHIBIT G

Verification

VERIFICATION OF APPLICATION

I, Blain van Melle, having knowledge of the matters set forth in the above Application of TransAlta Energy Marketing (U.S.) Inc. for Renewal of Authorization to Transmit Electric Energy to Canada, hereby verify that the contents thereof are true and correct to the best of my knowledge and belief.

To the best of my knowledge and belief, TransAlta Energy Marketing (U.S.) Inc. will take those actions required of it to do business as authorized in the States in which it will operate, and has complied with or is in the process of complying with all U.S. Federal and State laws regarding the matters contemplated in the Application.



Blain van Melle
Senior Vice President, Trading & Commercial

SUBSCRIBED AND SWORN before me, a notary public in and for the Province of Alberta, this 27 day of January 2021.



Scott Jeffers

My Commission does not expire.

SCOTT T. JEFFERS
A Notary Public in and for the
Province of Alberta.
My Commission
expires at the pleasure of the
Lieutenant Governor-in-Council