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June 4, 2024

Ms. Maria Robinson
Department of Energy
Grid Deployment Office
1000 Independence Avenue, S.W.
Washington, DC 20585

Re: Application of AMA QSE, LLC For Authority to Transmit Electric Energy to Mexico

Dear Ms. Robinson:

Pursuant to 10 C.F.R. § 205.300, *et seq.* of the regulations of the Department of Energy, enclosed for filing on behalf of AMA QSE, LLC is an original Application for Authority to Transmit Electric Energy to Mexico. In accordance with the requirements of 10 C.F.R. § 205.309, a copy of this application will be provided to the Secretary of the Federal Energy Regulatory Commission.

Should you have any questions or concerns regarding this matter, please do not hesitate to contact the undersigned.

Respectfully,

/s/ Frederick G. Jauss IV
Frederick G. Jauss IV
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fred.jauss@huschblackwell.com

Counsel for AMA QSE, LLC

**UNITED STATES OF AMERICA
BEFORE THE
DEPARTMENT OF ENERGY
GRID DEPLOYMENT OFFICE**

AMA QSE, LLC

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)

Docket No. EA-_____

**APPLICATION OF AMA QSE, LLC FOR AUTHORITY TO TRANSMIT ELECTRIC
ENERGY TO MEXICO**

Pursuant to Section 202(e) of the Federal Power Act (“FPA”), 16 U.S.C. § 824a(e) and Part 205, Subpart W of the regulation of the U.S. Department of Energy (the “Department” or “DOE”), 10 C.F.R. § 205.300, *et seq.*, AMA QSE, LLC (“AMA” or “Applicant”) hereby submits this application for blanket authorization to export electricity from the United States to Mexico (“Application”) for a period of five years. In support of this Application, AMA respectfully states as follows:

I. DESCRIPTION OF APPLICANT

The exact legal name of applicant is AMA QSE, LLC. AMA is authorized to do business in the State of Texas and such other states as required by the current nature of its business. AMA is a power marketer authorized by the Federal Energy Regulatory Commission (“FERC”) to make sales of electric power at wholesale in interstate commerce at market-based rates.¹ It does not own or control any transmission facilities and does not have a franchised service area. AMA will purchase the energy to be exported from wholesale generators, electric utilities, and federal power marketing agencies. The instant application relates to AMA as a marketer of electric energy only.

¹ See *AMA QSE, LLC*, Docket No. ER24-1770-000 (May 10, 2024) (granting market-based rate authority).

AMA is 100% owned by Ammper Holdco USA Corporation. Ammper Holdco USA Corporation is wholly-owned by Ammper Energia SAPI de CV. Ammper Energia SAPI de CV is wholly-owned by Invex Energia SAPI de CV. Invex Energia SAPI de CV is wholly owned by Invex Controladora SAB de CV. None of these companies owns any interest in energy assets or energy companies in the United States, other than the assets controlled by Ammper Holdco USA Corporation.

II. PARTNERS

AMA is not seeking authorization to export power on behalf of any of its partners or members.

III. CORRESPONDENCE AND COMMUNICATIONS

All communications and service related to this Application should be directed to the following:

<p>Juan I. Romo AMA QSE, LLC 401 Franklin Street Suite 2400-115 Houston, TX 77002 jromo@ammper.com</p>	<p>Frederick G. Jauss IV Husch Blackwell LLP 1801 Pennsylvania Avenue, NW Suite 1000 Washington, DC 20006-3606 (202) 378-2309 fred.jauss@huschblackwell.com</p> <p>Michael Blackwell Husch Blackwell LLP 1801 Pennsylvania Avenue, NW Suite 1000 Washington, DC 20006-3606 (202) 378-2333 michael.blackwell@huschblackwell.com</p>
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IV. JURISDICTION

Pursuant to FPA Section 202(e) the Department has jurisdiction over the action proposed in this Application. No other known federal, state, or local government has jurisdiction over the actions to be taken under the authority sought in this application.

V. FACILITIES

Consistent with the Department's prior orders, AMA requests authorization to export power to Mexico over any authorized international transmission facility that is appropriate for open access transmission by third parties in accordance with the export limits authorized by the Department.² Exhibit C to this Application identifies the international transmission facilities that are currently authorized by Presidential Permit and available for open access transmission.³

VI. TECHNICAL DISCUSSION OF PROPOSAL

By this Application, AMA seeks authorization to transmit electric energy to points in Mexico as a power marketer. As noted above, AMA does not currently own or control electric generation or transmission facilities and does not have a power supply of its own in the United States that would cause its electricity exports to have a reliability, fuel use, or system stability impact. AMA will purchase the electricity that it may export, on either a firm or an interruptible basis, from wholesale generators, electric utilities, federal power marketing agencies, and affiliates through negotiated agreements that have been voluntarily executed by the selling

² See, e.g., *Clear Power LLC*, Order Authorizing Electricity Exports to Mexico, Order No. EA-486 (Dec. 9, 2020).

³ See *id.* at 12.

parties after considering their own need for any such electricity. Accordingly, AMA's proposed electricity exports will not impair or tend to impede the sufficiency of electric power supplies in the United States or the regional coordination of electric utility planning or operations.⁴

Additionally, as a power marketer that does not own or operate a transmission system (and therefore must acquire transmission service pursuant to open access transmission and similar tariffs), AMA does not have the ability to cause a violation of the terms and conditions in the existing authorizations associated with international transmission facilities. Specifically, AMA does not have the ability to cause total electricity exports on Presidential Permit facilities to exceed the authorized instantaneous transmission capacity limits for such facilities.

AMA will make all necessary commercial arrangements and will obtain any and all other regulatory approvals required in order to carry out any electricity exports. This would include: (1) scheduling each transaction with the appropriate balancing authority area in compliance with all reliability criteria, standards, and guidelines of the North American Electric Reliability Corporation and the relevant Regional Entities (collectively, "NERC") in effect at the time of export, and (2) obtaining all necessary transmission access over approved export facilities. AMA agrees to abide by the export limits contained in the relevant export authorization of any transmission facilities over which AMA exports electricity to Mexico. The controls that are inherent in any transaction that complies with all NERC requirements and the export limits imposed by the Department on the international transmission facilities are sufficient to ensure

⁴ See 10 C.F.R. § 205.302(g) (2021).

that exports by AMA would not impede or tend to impede the coordinated use of transmission facilities within the meaning of FPA § 202(e).

VII. CONSISTENCY WITH LAWS

AMA's application is consistent with United States energy policy and will foster the development of a more efficient and competitive North American energy market. AMA 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 applicable reliability criteria, standards, and guidelines of NERC, reliability coordinators, and balancing authority area operator(s), including any applicable regional transmission organizations or independent system operators.

Given that AMA intends only to export power over existing transmission lines, this application qualifies for a categorical exclusion under the Department's regulations implementing the National Environmental Policy Act of 1969.⁵

⁵ See 10 C.F.R. Part 1021, Subpart D, Appendix B, § B4.2 (2021) (providing a categorical exclusion for the "[e]xport of electric energy as provided by Section 202(e) of the [FPA] over existing transmission systems or using transmission system changes that are themselves categorically excluded").

VIII. EXHIBITS AND ATTACHMENTS

In accordance with 10 C.F.R. § 205.303 (2021), the following exhibits are attached hereto:

Exhibit A	Agreements – Not Applicable
Exhibit B	Legal Opinion of AMA QSE, LLC’s counsel
Exhibit C	Transmission Facilities (submitted in lieu of maps)
Exhibit D	Non-U.S. Applicant’s Power of Attorney – Not Applicable
Exhibit E	State of Foreign Relationship – Not Applicable ⁶
Exhibit F	Operating Procedures – Not Applicable
Exhibit G	Receipt
Attachment 1	Verification
Attachment 2	Copy of letter order from FERC, dated May 10, 2024, granting AMA QSE, LLC market-based rate authority

IX. CONCLUSION

WHEREFORE, for the reasons set forth herein, AMA respectfully requests that the Department issue an order granting AMA authorization to transmit electric energy to Mexico for a period of five years, effective upon issuance of the order but no later than August 1, 2024.

Respectfully submitted,

/s/ Frederick G. Jauss IV
Frederick G. Jauss IV
HUSCH BLACKWELL LLP
1801 Pennsylvania Avenue, NW
Suite 1000
Washington, DC 20006-3606
(202) 378-2309
fred.jauss@huschblackwell.com

Counsel for AMA QSE, LLC

Date: June 4, 2024

⁶ There are no corporate relationships or existing contracts between and any other person, corporation, or foreign government, which in any way relate to the control or fixing of rates for the purchase, sale, or transmission of electric energy.

EXHIBIT A

Agreements

(Not Applicable)

EXHIBIT B

Legal Opinion of AMA QSE, LLC's Counsel

EXHIBIT B

Opinion of Counsel

The following opinion, dated June 4, 2024, is given in support of the Application of AMA QSE, LLC for Authority to Transmit Electric Energy to Mexico.

1. I am an attorney at law, authorized to practice law in the District of Columbia.
2. I am counsel to AMA QSE, LLC with respect to the foregoing application.
3. AMA QSE, LLC is a limited liability company, validly existing and in good standing under the laws of the State of Texas.
4. AMA QSE, LLC has full corporate power and authority to engage in exports of electric energy as requested in the application.
5. AMA QSE, LLC has complied or is in the process of complying with all Federal and State laws regarding the matters contemplated in the application.

I am opining here only as the federal laws of the United States, and laws of relevant states within the United States. I express no opinions as to the laws of any other jurisdiction.

/s/ Frederick G. Jauss IV
Frederick G. Jauss IV

Counsel for AMA QSE, LLC

EXHIBIT C

Transmission System Information

**International Transmission Facilities
Located at the U.S. – Mexico Border,
Authorized by Presidential Permit, and
Available for Open Access Transmission**

Owner	Location	Voltage	Presidential Permit No. ⁷
Comisión Federal de Electricidad	Falcon Dam, TX	138 KV	N/A
	Redford, TX	7.2 KV	PP-51
	Presidio, TX	13.8 KV	PP-03
Baja California Power, Inc.	Imperial Valley, CA	230 KV	PP-234
Generadora del Desierto – WAPA	San Luis, AZ	230 KV	PP-304*
AEP Texas Inc.	Brownsville, TX	138 KV	PP-425
		69 KV	PP-425
	Laredo, TX	138 KV	PP-423
		230 KV	PP-423
	Eagle Pass, TX	138 KV	PP-424
El Paso Electric Company	Diablo, NM	115 KV	PP-92
	Ascarate, TX	115 KV	PP-48
San Diego Gas & Electric	Miguel, CA	230 KV	PP-68
	Imperial Valley, CA	230 KV	PP-79
Sharyland Utilities	McAllen, TX	138 KV	PP-285
Nogales Transmission	Nogales, AZ	230 KV	PP-420*

*These transmission facilities have been authorized but are not yet constructed or operational.

⁷ 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.

EXHIBIT D

Irrevocable Power of Attorney

(Not Applicable)

EXHIBIT E

Statement of Corporate Relationship

(Not Applicable)

EXHIBIT F

Operating Procedures

(Not Applicable)

EXHIBIT G

Receipt

Receipt from Pay.gov for \$500 payment on June 4, 2024

From: notification@pay.gov
To: [Jauss, Fred](#)
Subject: Pay.gov Payment Confirmation: DOE General Collections Form
Date: Tuesday, June 4, 2024 12:57:30 PM

[EXTERNAL EMAIL]



An official email of the United States government

Pay.gov logo



Your payment has been submitted to Pay.gov and the details are below. If you have any questions regarding this payment, please contact Carol Fuster at (301) 903-0534 or carol.fuster@hq.doe.gov.

Application Name: DOE General Collections Form

Pay.gov Tracking ID: 27F0KB9J

Agency Tracking ID: 76739673241

Transaction Type: Sale

Transaction Date: 06/04/2024 12:57:17 PM EDT

Account Holder Name: Frederick Jauss

Transaction Amount: \$500.00

Card Type: MasterCard

Card Number: *****8795

Payment Type : Other

Bill Number:

PO Number :

WFO Number:

Other : Filing Fee for Electric Export Authorization under 10 CFR 205.309 for AMA QSE, LLC

Comments:

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.



Pay.gov is a program of the U.S. Department of the Treasury, Bureau of the Fiscal Service

ATTACHMENT 1

Verification

VERIFICATION

STATE OF TEXAS)
)
COUNTY OF TRAVIS)

Juan Romo, being first duly sworn, states that they are Vice President and General Manager of AMA QSE, LLC, and that they are authorized to execute this verification; that they have read the above and foregoing Application and is familiar with the contents thereof; and that all allegations and facts contained therein, are true and correct to the best of their knowledge, information, and belief.

Juan Ignacio Romo Garcia



06/03/2024 03:01 PM CDT

Juan Romo
Vice President and General Manager
AMA QSE, LLC

Subscribed and sworn before me this 3rd day of June, 2024.

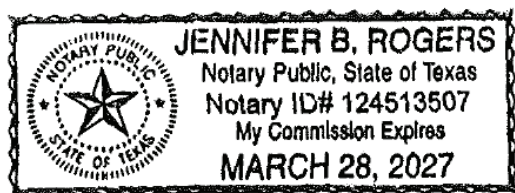
A handwritten signature in blue ink.



06/03/2024 03:03 PM CDT

Notary Public

My commission expires: March 28, 2027



Online Notary Public. This notarial act involved the use of online audio/video communication technology. Notarization facilitated by SIGNiX®

ATTACHMENT 2

AMA QSE, LLC

FERC MARKET BASED RATE AUTHORITY

Letter Order issued by FERC

Granting AMA QSE, LLC Market-Based Rate Authorization

Docket No. ER24-1770-000

May 10, 2024

FEDERAL ENERGY REGULATORY COMMISSION
Washington, D.C. 20426

OFFICE OF ENERGY MARKET REGULATION

In Reply Refer To:
AMA QSE, LLC
Docket No. ER24-1770-000

Issued: May 10, 2024

Frederick G. Jauss IV
Husch Blackwell LLP
1801 Pennsylvania Avenue, N.W., Suite 1000
Washington, D.C. 20006

Reference: Market-Based Rate Authorization

On April 16, 2024, you filed on behalf of AMA QSE, LLC (AMA QSE) an application for market-based rate authority with an accompanying tariff. The proposed market-based rate tariff provides for the sale of energy, capacity, and ancillary services at market-based rates.¹ You request on behalf of AMA QSE waivers commonly granted to similar market-based rate applicants. AMA QSE's market-based rate tariff is accepted for filing, effective May 1, 2024, as requested.² Based on your representations, AMA

¹ AMA QSE requests authorization to sell ancillary services in all of the regional transmission organization or independent system operator markets for which the Commission has approved sales of specific ancillary services. AMA QSE also requests authorization to engage in the sale of certain ancillary services as a third-party provider in other markets.

² AMA QSE, LLC, Market-Based Rate Tariff, [Market-Based Rate Tariff, FERC Electric Tariff No. 1 - AMA QSE, LLC \(0.0.0\)](#). AMA QSE's tariff includes reference to section 141.14 of the Commission's regulations. The Commission removed section 141.14 from its regulations effective March 28, 2019. *Elimination of Form 80 & Revision of Reguls. on Recreational Opportunities & Dev. at Licensed Hydropower Projects*, 165 FERC ¶ 61,256, at P 32 (2018). AMA QSE is directed to remove section 141.14 of the Commission's regulations from their tariffs the next time they make a market-based rate filing with the Commission. The next time AMA QSE makes a market-based rate filing with the Commission, it must include a revised tariff in compliance with Order Nos. 697 and 697-A to include appropriate citations. *See Market-Based Rates for Wholesale Sales of Elec. Energy, Capacity & Ancillary Servs. by Pub. Utils.*, Order No.

QSE meets the criteria for a Category 1 seller in all regions and is so designated.³

Your filing was noticed on April 17, 2024, with comments, protests, or interventions due on or before May 7, 2024. None was filed.

Market-Based Rate Authorization

The Commission allows power sales at market-based rates if the seller and its affiliates do not have, or have adequately mitigated, horizontal and vertical market power.⁴

You represent that AMA QSE is owned by Ammper Holdco USA Corporation and is a power marketer. You represent that AMA QSE and its affiliates do not own or control any generation capacity. Based on your representations, AMA QSE satisfies the Commission's requirements for market-based rate authority regarding horizontal market power.⁵

With respect to vertical market power, you represent that AMA QSE and its affiliates either do not own, operate, or control any transmission facilities; or own, operate, or control transmission facilities that: (a) have a Commission-approved Open Access Transmission Tariff (OATT) on file; (b) are under the operational control of a regional transmission organization or an independent system operator; (c) have received waiver of the OATT requirement under 18 C.F.R. § 35.28(d)(1); or (d) satisfy the

697, 119 FERC ¶ 61,295, at P 916 (2007), *order on reh'g*, Order No. 697-A, 123 FERC ¶ 61,055, at P 384 (2008). *See also Niagara Mohawk Power Corporation*, 121 FERC ¶ 61,275 (2007) at P 8.

³ *See Refinements to Policies and Procedures for Market-Based Rates for Wholesale Sales of Elec. Energy, Capacity & Ancillary Servs. by Pub. Utils.*, Order No. 816, 153 FERC ¶ 61,065, at P 320 (2015). Order No. 697, 119 FERC ¶ 61,295 at PP 848-850.

⁴ Order No. 697, 119 FERC ¶ 61,295 at PP 62, 399, 408, 440.

⁵ We note that AMA QSE is not being granted authority to make third-party sales of operating reserves to a public utility that is purchasing ancillary services to satisfy its own open access transmission tariff requirements to offer ancillary services to its own customers. If AMA QSE seeks such authority, it must make the required showing and receive Commission authorization prior to making such sales. *See Third-Party Provision of Ancillary Servs.; Accounting and Financial Reporting for New Elec. Storage Technologies*, Order No. 784, 144 FERC ¶ 61,056, at PP 200-202 (2013), *order on clarification*, Order No. 784-A, 146 FERC ¶ 61,114 (2014).

requirements for a blanket waiver under 18 C.F.R. § 35.28(d)(2).⁶ Further, you affirmatively state that AMA QSE and its affiliates have not erected barriers to entry and will not erect barriers to entry into the relevant market. Based on your representations, AMA QSE satisfies the Commission's requirements for market-based rate authority regarding vertical market power.

Waivers, Authorizations, and Reporting Requirements

AMA QSE's request for waiver of Subparts B and C of Part 35 of the Commission's regulations requiring the filing of cost-of-service information, except for sections 35.12(a), 35.13(b), 35.15 and 35.16 is granted. AMA QSE's request for waiver of Part 41 and Part 141 of the Commission's regulations concerning accounting and reporting requirements is granted with the exception of 18 C.F.R. § 141.15.⁷ AMA QSE's request for waiver of Part 101 of the Commission's regulations is hereby granted, with the exception that waiver of the provisions of Part 101 that apply to hydropower licensees is not granted with respect to licensed hydropower projects.⁸ Notwithstanding the waiver of the accounting and reporting requirements here, AMA QSE is expected to keep its accounting records in accordance with generally accepted accounting principles.

AMA QSE requests blanket authorization under Part 34 of the Commission's regulations for all future issuances of securities and assumptions of liability. A separate notice was published in the Federal Register establishing a period during which protests could be filed. None was filed. AMA QSE is 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 AMA QSE, compatible with the public interest,

⁶ See *Open Access and Priority Rights on Interconnection Customer's Interconnection Facilities*, Order No. 807, 150 FERC ¶ 61,211, *order on reh'g*, Order No. 807-A, 153 FERC ¶ 61,047 (2015).

⁷ See Order No. 697, 119 FERC ¶ 61,295 at PP 984-985.

⁸ Hydropower licensees are required to comply with the requirements of the Uniform System of Accounts pursuant to 18 C.F.R. Part 101 to the extent necessary to carry out their responsibilities under Part I of the Federal Power Act (FPA). We further note that a licensee's status as a market-based rate seller under Part II of the FPA does not exempt it from its accounting responsibilities as a licensee under Part I of the FPA. See Order No. 816, 153 FERC ¶ 61,065 at PP 345-350; *Seneca Gen., LLC*, 145 FERC ¶ 61,096, at P 23, n.20 (2013) (citing *Trafalgar Power, Inc.*, 87 FERC ¶ 61,207, at 61,798 (1999) (noting that "all licensees are required to comply with the requirements of the Uniform System of Accounts to the extent necessary to carry out their responsibilities under [s]ections 4(b), 10(d) and 14 of the FPA"))).

and reasonably necessary or appropriate for such purposes.⁹

AMA QSE must file Electric Quarterly Reports (EQRs) with the Commission, consistent with Order Nos. 2001¹⁰ and 768.¹¹ AMA QSE must file EQRs electronically with the Commission consistent with the procedures set forth in Order No. 770.¹² AMA QSE further must timely report to the Commission any change in status that would reflect a departure from the characteristics the Commission relied upon in granting market-based rate authority, which may include the appointment of a non-independent director to a market-based rate seller's board.¹³

In Order No. 860,¹⁴ the Commission revised its regulations governing market-based rates for public utilities to collect certain information through a relational database in order to streamline and modernize the Commission's data collection processes. AMA QSE must comply with the requirements of Order Nos. 860 and 860-A,

⁹ See Order No. 697, 119 FERC ¶ 61,295 at PP 999-1000.

¹⁰ *Revised Pub. Util. Filing Requirements*, Order No. 2001, 99 FERC ¶ 61,107, *reh'g denied*, Order No. 2001-A, 100 FERC ¶ 61,074, *reh'g denied*, Order No. 2001-B, 100 FERC ¶ 61,342, *order directing filing*, Order No. 2001-C, 101 FERC ¶ 61,314 (2002), *order directing filing*, Order No. 2001-D, 102 FERC ¶ 61,334, *order refining filing requirements*, Order No. 2001-E, 105 FERC ¶ 61,352 (2003), *order on clarification*, Order No. 2001-F, 106 FERC ¶ 61,060 (2004), *order revising filing requirements*, Order No. 2001-G, 120 FERC ¶ 61,270, *order on reh'g and clarification*, Order No. 2001-H, 121 FERC ¶ 61,289 (2007), *order revising filing requirements*, Order No. 2001-I, 125 FERC ¶ 61,103 (2008).

¹¹ *Elec. Mkt. Transparency Provisions of Section 220 of the Fed. Power Act*, Order No. 768, 140 FERC ¶ 61,232 (2012), *order on reh'g*, Order No. 768-A, 143 FERC ¶ 61,054 (2013).

¹² *See Revisions to Elec. Quarterly Report Filing Process*, Order No. 770, 141 FERC ¶ 61,120, at P 3 (2012) (citing Order No. 2001, 99 FERC ¶ 61,107 at P 31).

¹³ 18 C.F.R. § 35.42 (2023); *see also Reporting Requirement for Changes in Status for Pub. Utils. with Market-Based Rate Auth.*, Order No. 652, 110 FERC ¶ 61,097, *order on reh'g*, Order No. 652-A, 111 FERC ¶ 61,413 (2005). *See* 18 C.F.R. § 35.42(a); *Evergny Kan. Cent., Inc.*, 181 FERC ¶ 61,044, at P 45 (2022); *order on reh'g*, 184 FERC ¶ 61,003, at PP 24-26; *Energy Prepay II, LLC*, 185 FERC ¶ 61,111 at P 39 (2023).

¹⁴ *Data Collection for Analytics and Surveillance and Mkt.-Based Rate Purposes*, Order No. 860, 168 FERC ¶ 61,039 (2019), *order on reh'g*, Order No. 860-A, 170 FERC ¶ 61,129 (2020).

as well as the regulations promulgated pursuant to those rules.

This action does not constitute approval of any service, rate, charge, classification, or any rule, regulation, or practice affecting such rate or service provided for in the filed documents; nor shall such action be deemed as recognition of any claimed contractual right or obligation affecting or relating to such service or rate; and such acceptance is without prejudice to any findings or orders which have been or may hereafter be made by the Commission in any proceeding now pending or hereafter instituted by or against any of the applicant(s).

This action is taken pursuant to the authority delegated to the Director, Division of Electric Power Regulation - West, under 18 C.F.R. § 375.307. This order constitutes final agency action. Requests for rehearing by the Commission may be filed within 30 days of the date of issuance of this order, pursuant to 18 C.F.R § 385.713.

Issued by: Amery S. Poré, Director, Division of Electric Power Regulation – West