

March 13, 2025

**Via Electronic Mail**

U.S. Department of Energy  
Grid Deployment Office  
1000 Independence Ave., S.W.  
Washington, DC 20585

Re: Application of Castleton Commodities Energy Trading LLC for  
Authorization to Transmit Electricity from the United States to Canada  
Docket No. EA-\_\_\_\_

To whom it may concern:

Please find enclosed for filing on behalf of Castleton Commodities Energy Trading LLC (CCET) the “Application of Castleton Commodities Energy Trading LLC for Authorization to Transmit Electric Energy to Canada.” In addition, CCET has submitted electronically the amount of \$500 via the U.S Department of Energy General Collections website, as required under 10 C.F.R Section 205.309. The Agency Tracking ID Number for this payment is: 76988575895. A copy of the Application is being served contemporaneously upon the Federal Energy Regulatory Commission, as required by 10 C.F.R. § 205.309 (2024).

CCET respectfully requests that the Department grant the requested authorization with an effective date of May 12, 2025.

Thank you for your attention to this matter. Please contact the undersigned if there are any questions.

Sincerely,

/s/ Daniel E. Frank

Daniel E. Frank

Allison E. S. Salvia

*Counsel for*

*Castleton Commodities Energy Trading LLC*

Enclosures

cc: Federal Energy Regulatory Commission

**Castleton Commodities Energy** ) **Docket No. EA-\_\_\_\_\_**  
**Trading LLC** )

<sup>1</sup> Energy Trading Innovations LLC (“ETI”) is the only entity that holds 10% or greater of the voting interests in CCI. ETI, a Delaware limited liability company, is owned by unaffiliated minority investors.

generation facilities and other energy assets, and engages in (among other things) the merchandising, marketing, and proprietary trading of physical energy commodities, including coal, electric power, natural gas, natural gas liquids, crude oil, fuel oil, and refined products, as well as financial instruments related to, and the transportation and storage of, these commodities.

Applicant is authorized by the Federal Energy Regulatory Commission (“FERC”) to make sales of electric energy, capacity, and certain ancillary services at wholesale in interstate commerce at market-based rates.<sup>2</sup> Applicant does not own any generation itself. Through upstream ownership and control, Applicant is affiliated with Rensselaer Generating LLC, Roseton Generating LLC, Salem Harbor Power Development LP, Hunlock Energy, LLC, Hunlock Creek Generating LLC, and Signal Hill Generating LLC, each of which owns and operates one or more wholesale generating facilities.<sup>3</sup> Rensselaer Generating LLC, Roseton Generating LLC, Salem Harbor Power Development LP, Hunlock Energy, LLC, and Hunlock Creek Generating LLC are authorized by FERC to sell electric energy, capacity and ancillary services at market-based rates.<sup>4</sup> Signal Hill LLC operates within the Electric Reliability Council of Texas (“ERCOT”) region and therefore is not subject to FERC’s public utility regulation. Applicant, through common upstream ownership,

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<sup>2</sup> See *Castleton Commodities Energy Services LLC*, Docket No. ER24-2589-000 (issued Sep. 26, 2024) (delegated letter order) (granting market-based rate authorization to Applicant).

<sup>3</sup> The Rensselaer facility is an approximately 80 MW natural gas-fired cogeneration facility located in Rensselaer, New York; the Roseton facility is an approximately 1,210 MW oil- and natural gas-fired electric generation facility located in Newburgh, New York; the Salem Harbor facility is an approximately 674 MW natural gas-fired, electric combined-cycle power generation facility located in Salem, Massachusetts; the Hunlock Energy facility is an approximately 44 MW simple cycle, natural gas-fired generation facility located near the town of Hunlock Creek, Pennsylvania; the Hunlock Creek facility is an approximately 146 MW natural gas-fired and steam combined-cycle facility located in Hunlock Township, Pennsylvania; and the Signal Hill facility is an 80 MW natural gas-fired cogeneration facility located in ERCOT.

<sup>4</sup> See, e.g., *LDH Rensselaer LLC*, Letter Order, Docket No. ER12-1561 (May 29, 2012) (granting market-based rate authority); *CCI Roseton LLC*, Letter Order, Docket No. ER13-773 (Mar. 21, 2013) (same); *Footprint Power Salem Harbor Dev. LP*, Letter Order, Docket No. ER17-424 (Feb. 23, 2017) (same); *Chambersburg Energy, LLC*, Letter Order, Docket Nos. ER17-989-000, *et al.* (Apr. 11, 2017) (unpublished letter order) (same); *UGI Development Co., et al.*, 88 FERC ¶ 61,005 (1999) (same).

is also affiliated with Castleton Commodities Merchant Trading, L.P., a power marketer that does not own any generation itself.

Applicant is in the business of participating in the wholesale market for purchases and sales of electric energy, as well as participating in the market for other energy commodities and related financial products. Other than the generating facilities owned by its affiliates as described above, neither Applicant nor any of its affiliates owns or controls any electric power generation or transmission facilities and none of them has a franchised electric power service area. Applicant operates as a power marketer<sup>5</sup> and brokers, sells and buys electric power at wholesale and arranges services in related areas such as fuel supplies and transmission services. Applicant will purchase the power to be exported from wholesale generators, electric utilities, and federal power marketing agencies. Applicant will have title to any electricity transmitted to Canada under the authorization sought in this Application. This Application relates to Applicant as a marketer of electric power only. In addition, Applicant is not seeking authorization to export power on behalf of, or in conjunction with, any partners or partnerships.

## **II. 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, except to the extent that Applicant must comply with applicable FERC requirements in making sales at wholesale. FERC's address is:

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<sup>5</sup> As used herein, the terms "marketer" and "power marketer" mean an entity that buys and sells electric power for its own account.

Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, DC 20426

### **III. COMMUNICATIONS**

Communications regarding this Application should be addressed to the following:

Compliance Department  
Castleton Commodities International LLC  
2200 Atlantic Street, Suite 800  
Stamford, CT 06902  
Tel.: 203-564-8100  
Email: [compliance@CCI.com](mailto:compliance@CCI.com)

Daniel E. Frank  
Allison E. S. Salvia  
Eversheds Sutherland (US) LLP  
700 Sixth Street, N.W., Suite 700  
Washington, DC 20001-3980  
Tel.: 202-383-0838  
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Email: [DanielFrank@eversheds-sutherland.com](mailto:DanielFrank@eversheds-sutherland.com)  
[AllisonSalvia@eversheds-sutherland.com](mailto:AllisonSalvia@eversheds-sutherland.com)

### **IV. FACILITIES AND TECHNICAL DISCUSSION**

Applicant hereby applies for authorization to transmit electric power to Canada as a power marketer 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. Applicant plans to export electric power over authorized transmission interconnections between Canada and the United States. These sales would be made in foreign commerce at the U.S.-Canada border. Transmission to the point of delivery will be arranged by Applicant over any of the existing international electric transmission facilities set out in Attachment 1 (which is a list of the currently authorized electricity export points), and any other international transmission facilities that may be approved by the Department in the future.

Applicant 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 on which its exports of power could have a reliability, fuel use or system stability impact.<sup>6</sup> Applicant will purchase the power to

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<sup>6</sup> Applicant is affiliated with entities that own wholesale generating facilities, as described above.

be exported from wholesale generators, electric utilities, and federal power marketing agencies. By definition, such power is surplus to the system of the selling generator. Accordingly, the proposed exports will not impair or tend to impede the sufficiency of the electric power supply within the United States or the regional coordination of electric utility planning or operations. Additionally, as a power marketer that does not own or operate a transmission system, Applicant does not have the ability to cause a violation of the terms and conditions in the existing authorizations associated with the international transmission facilities identified in Attachment 1. Specifically, Applicant does not have the ability to cause total exports on Presidential Permit facilities to exceed the authorized instantaneous transmission rate.

Applicant will make all necessary commercial arrangements and will obtain any and all other regulatory approvals required in order to carry out any power 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. Applicant agrees to abide by the export limits contained in the relevant export authorization of any transmission facilities over which Applicant exports electric power to Canada. 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 that exports by Applicant would not impede or tend to impede the coordinated use of transmission facilities within the meaning of FPA Section 202(e).

In previous orders granting export authorizations to electric power marketers, the Department 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 limits of cross-border facilities.<sup>7</sup> These same considerations demonstrate that Applicant's proposed exports will not impair or tend to impede the sufficiency of electric supplies in the United States or the regional coordination of electric utility planning or operations.

## **V. CONSISTENCY WITH LEGAL REQUIREMENTS**

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

Because the proposed exports will occur over existing transmission facilities, Applicant respectfully submits that the Application qualifies for a categorical exclusion under the National Environmental Policy Act of 1969, such that neither an Environmental Assessment nor an Environmental Impact Statement is required.

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<sup>7</sup> See, e.g., *NorAm Energy Services, Inc.*, No. EA-105-CN (Aug. 16, 1996); *MidCon Power Services Corp.*, No. EA-114 (July 15, 1996); *USGen Power Services*, No. EA-112 (June 27, 1996); *CNG Power Services Corp.*, No. EA-110 (June 20, 1996); *Destec Power Services, Inc.*, No. EA-113 (May 31, 1996); *North American Energy Conservation, Inc.*, No. EA-103 (May 30, 1996); *NorAm Energy Services, Inc.*, No. EA-105-MX (May 30, 1996); *Morgan Stanley Capital Group Inc.*, No. EA-185-A-CN (Aug. 14, 2000); *Saracen Energy Partners, LP*, No. EA-340 (June 18, 2008); *Castleton Commodities Merchant Trading L.P.*, No. EA-359-B (Oct. 2 2014); *Morgan Stanley Cap. Grp. Inc.*, No. EA-185-D (July 8, 2015); *Northland Power Energy Mktg. (US) Inc.*, No. EA-473 (June 18, 2019); *Macquarie Energy LLC*, No. EA-479 (Nov. 21, 2019); *Northland Power Energy Mktg. (US) Inc.*, No.473-A (Sept. 24, 2024); *AlbertaEx, L.P.*, No. EA-504 (Oct. 9, 2024).



Finally, Applicant will continue to comply with such requirements as may be imposed by the Department on other power marketers with blanket electricity export authorization, including making periodic reports to the Department regarding exports, as may be applicable or required.

## **VI. EXHIBITS & ATTACHMENTS**

Applicant includes the following Exhibits and Attachments with this Application:

Exhibit A (10 C.F.R. § 205.303(a)) – Export Agreements. Not Applicable. Currently there is no agreement with any Canadian entity to export electricity.

Exhibit B (10 C.F.R. § 205.303(b)) – Opinion of Counsel. Attached as Exhibit B is the legal opinion of counsel that the proposed exports are within Applicant’s corporate power and that Applicant has complied and will continue to comply with all pertinent Federal and State laws.

Exhibit C (10 C.F.R. § 205.303(c)) – Maps. Not Applicable. Applicant has no “system” of its own to export electricity. Therefore, no maps are available to include as this Exhibit C. Additionally, as described above, Applicant requests authority to export energy to Canada over any international transmission facility authorized by Presidential Permit that is appropriate for open access transmission by third parties in accordance with the assessment made by the Department of the transmission limits for operation in the export mode.

Exhibit D (10 C.F.R. § 205.303(d)) – Agent for Foreign Entities. Not Applicable. Applicant does not reside or have its principal office outside the United States. Therefore, no designated agent residing within the United States is required.

Exhibit E (10 C.F.R. § 205.303(e)) – Statement of Corporate Relationship. Not Applicable. Applicant does not have any corporate relationship or existing contract between it and any other

person, corporation, or foreign government, which in any way relates to the control or fixing of rates for the purchase, sale or transmission of electric energy.

Exhibit F (10 C.F.R. § 205.303(f)) – Operating Procedures. Not Applicable. Neighboring utilities may be informed of any excess capacity and energy by participating in the competitive wholesale markets in the relevant areas.

Attachment 1 – Export Facilities. A list of international transmission lines at the U.S.-Canada border authorized for third-party use is attached to this Application as Attachment 1.

Attachment 2 – Verification. Applicant has attached as Attachment 2 a signed, notarized verification of the factual representations in this Application.

## **VII. CONCLUSION**

Castleton Commodities Energy Trading LLC respectfully requests that the Department grant this Application and the requested authorization with an effective date of May 12, 2025, or the earliest date thereafter as may be permitted by law.

Respectfully submitted,

/s/ Daniel E. Frank

Daniel E. Frank  
Allison E. S. Salvia

*Counsel for  
Castleton Commodities Energy Trading LLC*

March 13, 2025

**EXHIBIT A**

**EXPORT AGREEMENTS**

**(NOT APPLICABLE)**

**EXHIBIT B**

**OPINION OF COUNSEL**



Castleton Commodities Energy Trading LLC  
2200 Atlantic Street, Suite 800  
Stamford, Connecticut 06902 – 6834

T 203 564 – 8100 2200  
F 203 564 – 8119

March 11, 2025

U.S. Department of Energy  
Grid Deployment Office  
1000 Independence Ave., S.W.  
Washington, DC 20585

Re: Application of Castleton Commodities Energy Trading LLC for  
Authorization to Transmit Electricity from the United States to Canada  
Docket No. EA-\_\_

To whom it may concern:

As counsel to Castleton Commodities Energy Trading LLC (“CCET”), I have been asked to provide an opinion pursuant to 10 C.F.R. § 205.303(b) with respect to CCET’s Application for Authorization to Transmit Electricity from the United States to Canada.

Based on my knowledge and understanding of CCET’s proposal and my familiarity with CCET’s Articles of Incorporation, CCET’s Bylaws, CCET’s other corporate documents, and certificates of public officials and other instruments that I have deemed necessary or advisable for purposes of this opinion, I am of the opinion that:

1. CCET has the requisite corporate authority to export electric energy to Canada.
2. CCET will comply with all federal and state laws required to export electric energy to Canada.

This opinion is rendered solely to you in connection with the above-mentioned matter. This opinion may not be relied on by you for any other purpose or relied upon or furnished to any other person without my prior written consent.

Sincerely,

A handwritten signature in black ink, appearing to read "John V. Tesoriero", written in a cursive style.

John V. Tesoriero  
*Attorney for*  
*Castleton Commodities Energy Trading LLC*

**EXHIBIT C**

**MAPS**

**(NOT APPLICABLE)**

**EXHIBIT D**

**AGENT FOR FOREIGN ENTITIES**

**(NOT APPLICABLE)**

**EXHIBIT E**

**STATEMENT OF CORPORATE RELATIONSHIP**

**(NOT APPLICABLE)**



**EXHIBIT F**

**OPERATING PROCEDURES**

**(NOT APPLICABLE)**

**ATTACHMENT 1**

**LIST OF TRANSMISSION LINES AT THE U.S.-CANADA BORDER  
CURRENTLY AUTHORIZED FOR THIRD-PARTY USE**

Present Owner	Location	Voltage	Presidential Permit No.*
Versant Power (f/k/a/ Bangor Hydro-Electric Company)	Baileyville, ME	345-kV	PP-500
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
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**
Joint Owners of the Highgate Project	Highgate, VT	120-kV	PP-82
Long Sault, Inc.	Massena, NY	2-115-kV	PP-24
Maine Electric Power Company	Houlton, ME	345-kV	PP-43
Versant Power (f/k/a Maine Public Service Company)	Limestone, ME Fort Fairfield, ME Madawaska, ME Aroostook, ME Easton, ME	69-kV 69-kV 138-kV 2-69-kV 7.2-kV	PP-497 PP-497 PP-498 PP-498 PP-499
Minnesota Power, Inc.	International Falls, MN	115-kV	PP-78
Minnesota Power, Inc.	Roseau, County, MN	500-kV	PP-398
Minnkota Power Cooperative	Roseau County, MN	230-kV	PP-61
Montana Alberta Tie Ltd.	Cut Bank, MT	230-kV	PP-399
NECEC Transmission LLC	Beattie Twp, ME	±320-kV DC	PP-438**
New York Power Authority	Massena, NY Massena, NY Niagara Falls, NY Devils Hole, NY	765-kV 2-230-kV 2-345-kV 230-kV	PP-56 PP-25 PP-74 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
TDI New England	Alburgh, VT	±320-kV DC	PP-400**
Vermont Electric Power Co.	Derby Line, VT	120-kV	PP-66

Vermont Electric Transmission Co.	Norton, VT	±450-kV DC	PP-76
Vermont Transco LLC	Highgate, VT	120 kV	PP-82

\* 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.

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

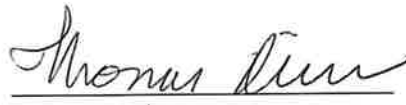
**ATTACHMENT 2**

**VERIFICATION**

**VERIFICATION**

STATE OF CONNECTICUT                    )  
  )  
CITY OF STAMFORD                         )

The undersigned, being duly sworn, states that he is the authorized representative of Castleton Commodities Energy Trading LLC; that he has read the foregoing application and knows the contents thereof; and that all the statements contained therein with respect to Castleton Commodities Energy Trading LLC are true and correct to the best of his knowledge, information and belief.



Thomas DiCapua  
Managing Director

Subscribed and sworn to before me  
this 11<sup>th</sup> day of March, 2025.



Notary Public

My commission expires: \_\_\_\_\_

