Crowell & Moring LLP
1001 Pennsylvania Avenue NW
Washington, DC 20004
+1.202.624.2500 main
+1.202.628.5116 fax

June 18, 2025

Nick Elliot
Department of Energy
Grid Deployment Office
1000 Independence Avenue, S.W.
Washington, DC 20585

Submitted via email to electricity.exports@hq.doe.gov

Re: Application of CWP Energy, Inc. for Renewal of Authority to Transmit Electric Energy to Canada

Dear Mr. Elliot:

Pursuant to 10 C.F.R. § 205.300, *et seq.* of the regulations of the Department of Energy, enclosed for filing on behalf of CWP Energy, a subsidiary of McGill-St. Laurent ("CWP Energy") is an original Application for Renewal of Authority to Transmit Electric Energy to Canada

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

Respectfully submitted,

Ruta Kalvaitis Skučas, Esq.
Kathryn Douglass, Esq.
1001 Pennsylvania Avenue, NW
Washington, DC 20004
Telephone: (202) 508-8702
ruta.skucas@crowell.com

Attorneys for CWP Energy, Inc.

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

CWP Energy, Inc.	)	Docket No. EA-410-C

APPLICATION OF CWP ENERGY, INC. 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.*, CWP Energy, Inc., a subsidiary of McGill-St. Laurent ("CWP Energy" or "Applicant") 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 CWP Energy original authorization to export electric energy as a power marketer on June 23, 2015 in Order No. EA-410-A, which was most recently reauthorized on December 9, 2020 in Order No. EA-410-B. CWP Energy's current export authorization expires on December 9, 2025. Accordingly, CWP Energy respectfully requests that this renewal application be granted as expeditiously as possible. CWP Energy respectfully requests authorization for renewal of authority to transmit electric energy from the United States to Canada for a period of five (5) years.

I. COMMUNICATIONS

Communications and correspondence concerning this filing should be addressed to:

Ruta Kalvaitis Skučas, Esq.
Crowell & Moring LLP
1001 Pennsylvania Avenue, NW
Washington, DC 20004
Telephone: (202) 508-8702
rskucas@crowell.com

Alain Brisebois
President, CWP Energy
407 McGill Street, Suite 315
Montreal, PQ, H2Y 2G3
Tel. (514) 871-2118
Alain@cwpenergy.com

II. DESCRIPTION OF APPLICANT

Applicant is a Canadian Corporation with its principal place of business in Montréal, Québec, Canada. CWP Energy is owned 88.4% by McGill-St. Laurent, 10.03% by Investissements AFA Inc, and 1.57% by Mr. Guillaume Desnoyers. McGill-St. Laurent is owned by two individuals, Mr. Phillipe Boisclair, as a majority owner, and Mr. Christian L'Abbe, as a minority owner. Mr. Boisclair and Mr. L'Abbe do not have any ownership interest or involvement in any other company that is a traditional utility or that owns, operates, or controls any electric generation, transmission or distribution facilities, nor do they have any direct involvement with the energy industry other than through the ownership of CWP Energy and its affiliates. Investissements AFA Inc. is owned by Mr. Alain Brisebois. Mr. Brisebois does not have any ownership interest or involvement in any other company that is a traditional utility or that owns, operates, or controls any electric generation, transmission or distribution facilities, nor does he have any direct involvement with the energy industry other than through his ownership, and in his capacity as President, of CWP Energy. Mr. Desnoyers also does not have any ownership interest or involvement in any other company that is a traditional utility or that owns, operates, or controls any electric generation, transmission or distribution facilities, nor does he have any direct involvement with the energy industry other than through his ownership, and in his capacity as Vice President, of CWP Energy.

CWP Energy is a FERC-authorized power marketer engaging in the purchase and sale of physical and/or virtual energy in the Day-ahead and Real-time Markets of various Independent

System Operators and Regional Transmission Organizations. CWP Energy applied for market-based rate authority on February 28, 2012 in FERC Docket No. ER12-1171-000. The application was approved by delegated letter order issued on April 3, 2012, attached hereto as Exhibit G. CWP Energy also holds authorization to export electric energy to Mexico. *See CWP Energy*, Order Authorizing Electricity Exports to Mexico, Order No. EA-503 (Dec. 20, 2023).

III. JURISDICTION

CWP Energy believes that the U.S. Department of Energy ("DOE") is the only governmental agency that has jurisdiction over this application.

IV. DESCRIPTION OF TRANSMISSION FACILITIES

CWP Energy intends to export electricity over existing international transmission facilities between Canada and the United States, as identified in Exhibit C. CWP Energy requests authority to export electricity to Canada over any international transmission facility authorized by Presidential Permit that is appropriate for open access by third parties in accordance with the assessment made by DOE of the transmission limits for operation in the export mode.

V. TECHNICAL DISCUSSION OF PROPOSAL

Section 202(e) of the Federal Power Act ("FPA") and 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.[1] CWP Energy seeks blanket authority to transmit electric power to Canada as a power marketer. CWP Energy has no electric power supply system on which the proposed exports could have a reliability, fuel use system or stability impact. CWP Energy also

[1] 16 U.S.C. § 824a(e).

has no obligation to serve native load usually associated with a franchised service area, and, thus, the exports proposed by CWP Energy will not impair its ability to meet current and prospective power supply obligations.

CWP Energy 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 CWP Energy will export on either a firm or interruptible basis will not impair the sufficiency of the electric power supply within the U.S.[2]

CWP Energy will make all necessary commercial arrangements and will obtain any and all other regulatory approvals required in order to schedule and deliver power exports. All of the electricity exported by CWP Energy 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. CWP Energy will schedule its transactions with the appropriate balancing authority areas in compliance with the reliability criteria standards and guidelines established by the North American Reliability Corporation ("NERC") and its member regional councils in effect at the time of the 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

[2] *See Enron Power Marketing, Inc.*, Order EA-102 (1996).

facilities.[3] These same considerations demonstrate that the exports proposed by CWP Energy 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.

VI. COMPLIANCE WITH CONDITIONS AND PROCEDURES

CWP Energy proposes to abide by the general conditions consistent with DOE's previous grants of authorizations to power marketers as set forth in its previous orders, as described herein. From time to time, CWP Energy will enter into agreements with third parties which involve the export of electric power from the United States into Canada. Exports made by CWP Energy will not exceed the export limits for the facilities or otherwise cause a violation of the terms and conditions set forth in the export authorizations for each. With regard to specific transactions, CWP Energy will provide written evidence to DOE that it has secured sufficient transmission service for the delivery of power to the border. When scheduling the delivery of power, CWP Energy will comply with the applicable NERC reliability standards. For each calendar year, CWP Energy will provide DOE with reports indicating the gross amount of electricity delivered to Canada, consideration received during each month, and the maximum hourly rate of transmission, as well as any additional annual reports.

VII. VERIFICATION, REQUIRED COPIES, AND FEE

Verification executed by CWP Energy's authorized representative in accordance with 10 C.F.R. § 205.302(h) is enclosed with the Application. In accordance with the requirements of 10 C.F.R. § 205.307, and DOE's directions, an electronic copy of the Application is being provided

[3] *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).

to the Department. In accordance with the requirements of 10 C.F.R. § 205.309, an electronic copy of this application will be provided to the Secretary of the Federal Energy Regulatory Commission. Payment in the amount of $500 has been submitted through Pay.gov on June 13, 2025. A copy of the receipt is attached as Exhibit H.

VIII. 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	Transmission Agreements	Not Applicable
Exhibit B	Opinion of Counsel & Compliance Certificate	Attached
Exhibit C	Transmission Facilities	List of international transmission facilities submitted in lieu of a map
Exhibit D	Designation of Agent	Attached
Exhibit E	Statement of Corporate Relationship	Not Applicable
Exhibit F	Operating Procedures	Not Applicable
Exhibit G	FERC Market Based Rate Authority	Attached – Letter Order Issued by FERC Granting CWP Energy Market-Based Rate Authorization under Docket No. ER12-1171-000, issued on April 3, 2012
Exhibit H	Receipt	Receipt from Pay.gov for $500 paid on June 13, 2025

IX. CONCLUSION

WHEREFORE, CWP Energy respectfully requests that DOE grant this application for renewal of blanket authorization to export power from the United States to Canada, for a period of five (5) years.

Respectfully submitted,

Ruta Kalvaitis Skučas, Esq.
Kathryn Douglass, Esq.
1001 Pennsylvania Avenue, NW
Washington, DC 20004
Telephone: (202) 508-8702
rskucas@crowell.com

Attorneys for CWP Energy, Inc.

June 18, 2025

VERIFICATION

I, Alain Brisebois, being authorized to execute this verification and having knowledge of the matters set forth in this Application of CWP Energy, Inc., hereby verify that the contents thereof are true and correct to the best of my knowledge and belief.

Solemnly declared remotely by Alain Brisebois stated as being located in Montréal, Quebec, before me, Ma Lachelle Aranda Arevalo, a Notary Public and Commissioner, etc in Richmond Hill, Ontario on June 10, 2025 in accordance with O Reg 431/20, Administering Oath or Declaration Remotely.

Alain Brisebois
President, CWP Energy, Inc.

MA LACHELLE ARANDA AREVALO
Name of Notary Public (*printed name)*
Notary Public, and Commissioner, etc, Province of Ontario
My commission expires: Never

Ma Lachelle Aranda Arevalo
A Commissioner, etc.
in and for the Province of Ontario.
My commission is of unlimited duration.
No legal advice given. LSO #P15293

A COMMISSIONER, ETC.
MA LACHELLE ARANDA AREVALO
WHILE BEING A PARALEGAL
LSO# P15293
PROVINCE OF ONTARIO

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EXHIBIT A – TRANSMISSION AGREEMENTS

CWP Energy has not entered into any transmission agreements at this time.

EXHIBIT B – OPINION OF COUNSEL

June 17, 2025

CROWELL & MORING LLP ("C&M")
Ms. Ruta Kalvaitis Skučas
1001 Pennsylvania Ave, N.W.
Washington, D.C. 20004
United States of America

DEPARTMENT OF ENERGY ("DOE")
Mr. Nick Elliott
Grid Deployment Office
1000 Independence Avenue, S.W.
Washington, D.C. 20585
United States of America

Re: Application of CWP Energy Inc. for Renewal of Authorization to Export Electricity (the "Application")

Dear Mr. Elliott, Ms. Skučas,

This opinion letter (the "**Letter**") regarding the corporate power of CWP Energy Inc. (the "**Corporation**") to export electricity from the United States to Mexico (the "**Proposed Activities**") is being delivered to you pursuant to 10 C.F.R. § 205.303(b) and in connection with the Application.

1. Scope and Examinations

1.1 In connection with the opinions expressed in this Letter, we have examined such corporate records (including the Corporation's articles and by-laws), certificates and other documents and conducted such examinations as we considered necessary for the purpose of the opinions expressed in this Letter.

2. Jurisdiction

2.1 We are lawyers qualified to practice law in the Province of Québec and we express no opinion as to any laws or any matters governed by any laws other than the laws of the Province of Québec and the federal laws of Canada applicable therein.

3. Assumptions and Reliances

3.1 In connection with our opinions, we have, with your concurrence, made the following assumptions:

(a) with respect to all documents examined by us, all signatures are genuine, all individuals signing such documents have legal capacity, all documents submitted to us as originals are authentic and complete, all documents submitted to us as copies, whether facsimile, photostatic, electronic, certified or otherwise, are

BCF

BCF Avocats d'affaires
25e étage
1100, boul. René-Lévesque O.
Montréal (Québec) H3B 5C9
T. 514 397-8500
F. 514 397-8515

BCF Avocats d'affaires
Complexe Jules-Dallaire, T1
2828, boul. Laurier, 12e étage
Québec (Québec) G1V 0B9
T. 418 266-4500
F. 418 266-4515

bcf.ca

conform to their authentic original documents and the identity of all individuals acting or purporting to act as public officials is authentic; and

(b) all facts set forth in the certificates supplied, or otherwise conveyed to us, by the officers and directors of the Corporation and all documents, instruments and certificates contained in the corporate records and minute books of the Corporation as provided by the Corporation are complete, true, accurate and current.

4. Opinions

On the basis of the foregoing and subject to the qualifications herein expressed, we are of the opinion that:

4.1 The Corporation has the corporate power to perform the Proposed Activities contemplated by the Application. The Proposed Activities have been duly authorized by all necessary corporate action on the part of the Corporation.

4.2 The Corporation's performance of the Proposed Activities does not violate, result in a breach of, or constitute a default under the articles or by-laws of the Corporation.

5. Qualifications

5.1 The opinions in this Letter are given solely for the benefit of C&M and DOE in connection with the Application and as such may not, in whole or in part, be relied upon by, or shown or distributed to, any other person, nor quoted from or referred to in any other document, without our prior written consent.

5.2 Our opinions are given as of the date of this Letter; among other things, our opinions do not take into account any circumstance (including changes in law or facts or the conduct of any of the parties to the Proposed Activities or the Application) that may occur after that date and we can give no assurance that a transaction that occurs after the date of this Letter will not be affected by future changes to the law. We expressly disclaim any obligation or undertaking to advise any persons to whom this Letter is addressed, or any other persons entitled to rely on this Letter, of any matters or any change in matters (including, without limitation, any facts or circumstances or any subsequently enacted, published or reported laws, regulations or judicial decisions having retroactive effect) which may come to our attention after the date of this Letter and which may affect any of our opinions.

Yours truly,

BCF LLP

BCF LLP

EXHIBIT C – INTERNATIONAL TRANSMISSION FACILITIES

At the U.S.-Canada Border
Authorized for Use by Third Party Transmitters

Present Owner	Location	Voltage	Presidential Permit No.
Versant Power (f/k/a Bangor Hydro-Electric Company)	Baileyville, ME	345-kV	PP 500 (PP-89)
Basin Electric Power Cooperative	Tioga, ND	230-kV	PP-64
Bonneville Power Administration	Blaine, WA Blaine, WA Nelway, WA Nelway, WA	230-kV 500-kV 230-kV 230-kV	PP-10 PP-10 PP-36 PP-46
CHPE LLC	Champlain, NY	1,250 MW HVDC	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*
Vermont Transco LLC	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	69-kV 69-kV 138-kV 2-69-kV	PP 497 (PP-12) PP 497 (PP-12) PP 498 (PP-29) PP 498 (PP-29)

Present Owner	Location	Voltage	Presidential Permit No.
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
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
Sea Breeze Olympic Converter LP	Port Angeles, WA	±450-kV DC	PP-299*
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
NECEC Transmission LLC	Beattie Twp, ME	±320-kV DC	PP 438*
Edison Sault	Sault St. Marie, MI	230 kV	PP-228
Northern Pass Transmission	Pittsburg, NH	±320-kV DC	PP 371*

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

EXHIBIT D – DESIGNATION OF AGENT AND POWER OF ATTORNEY

IRREVOCABLE LIMITED POWER OF ATTORNEY

This IRREVOCABLE LIMITED POWER OF ATTORNEY is made on May __, 2025 by CWP Energy, Inc. (the "Principal"), a corporation organized and existing under the Canadian Business Corporations Act, with its headquarters at 407 McGill Street, Suite 315, Montreal, PQ, H2Y 2G3.

1. Appointment. The Principal hereby appoints Ruta Kalvaitis Skučas of Crowell & Moring LLP, as the Principal's true and lawful agent for the limited purpose set forth below.

2. Scope of Authority. Pursuant to 10 C.F.R. § 205.303(d), Attorney Skučas shall have the limited power and authority to serve as the agent for the Principal regarding all matters related to the Principal's authorization to export electricity to Canada as issued by the U.S. Department of Energy ("DOE"). This appointment will remain in effect for the duration of the authorization, a five-year period, and will terminate simultaneously with the expiration of the authorization granted by DOE.

3. Irrevocability. This Power of Attorney is irrevocable by the Principal.

Solemnly declared remotely by Alain Brisebois stated as being located in Montréal, Quebec, before me, Ma Lachelle Aranda Arevalo, a Notary Public and Commissioner, etc in Richmond Hill, Ontario on June 10, 2025 in accordance with O Reg 431/20, Administering Oath or Declaration Remotely.

By: _____
Alain Brisebois
President
CWP Energy, Inc.
407 McGill Street, Suite 315
Montreal, PQ, H2Y 2G3

MA LACHELLE ARANDA AREVALO
Name of Notary Public (*printed name)*
Notary Public, and Commissioner, etc, Province of Ontario
My commission expires: Never

Ma Lachelle Aranda Arevalo
A Commissioner, etc.
in and for the Province of Ontario.
My commission is of unlimited duration.
No legal advice given. LSO #P15293

A COMMISSIONER, ETC.
MA LACHELLE ARANDA AREVALO
WHILE BEING A PARALEGAL
LSO# P15293
PROVINCE OF ONTARIO

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EXHIBIT E – STATEMENT OF ANY CORPORATE RELATIONSHIP OR EXISTING CONTRACT

Not Applicable

EXHIBIT F – OPERATING PROCEDURES

Not Applicable

EXHIBIT G – FERC MARKET BASED RATE AUTHORITY

Letter Order Issued by FERC
Granting CWP Energy Market-Based Rate Authorization
Docket No. ER12-1171-000
April 3, 2012

FEDERAL ENERGY REGULATORY COMMISSION
Washington, D.C. 20426

OFFICE OF ENERGY MARKET REGULATION

In Reply Refer To:
Canadian Wood Products-Montreal Inc.
Docket No. ER12-1171-000

April 3, 2012

Ms. Carol A. Smoots
Attorney for Canadian Wood Products-Montreal Inc.
Pierce Atwood LLP
900 17th Street N.W.
Suite 350
Washington, D.C. 20006

Reference: Market-Based Rate Authorization

Dear Ms. Smoots:

On February 28, 2012, you filed on behalf of Canadian Wood Products-Montreal Inc. (CWP Energy) 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] CWP Energy requests waivers commonly granted to similar market-based rate applicants.

Your filing was noticed on February 28, 2012, with comments, protests or interventions due on or before March 20, 2012. None was filed.

Pursuant to the authority delegated to the Director, Division of Electric Power Regulation - West, under 18 C.F.R. § 375.307, your submittal filed in the referenced docket is accepted for filing, effective February 29, 2012, as requested. Based on your

[1] CWP Energy requests authorization to sell ancillary services in the markets administered by PJM Interconnection, L.L.C. (PJM), New York Independent System Operator, Inc. (NYISO), ISO New England Inc. (ISO-NE), California Independent System Operator Corp. (CAISO), and Midwest Independent Transmission System Operator, Inc. (MISO). CWP Energy also requests authorization to engage in the sale of certain ancillary services as a third-party provider in other markets.

representations, CWP Energy meets the criteria for a Category 1 seller in all regions and is so designated.[2]

You state that CWP Energy is located in Montreal, Canada, and intends to act as a power marketer. You further represent that CWP Energy is wholly owned by two individuals, and is not affiliated with any entity that owns or controls generation or transmission facilities. Further, you affirmatively state that CWP Energy has not erected barriers to entry and will not erect barriers to entry into the relevant market.

You state that CWP Energy meets the criteria for Category 1 seller status in all regions. You represent that neither CWP Energy nor any of its affiliates own or control any generation or transmission facilities. You also represent that CWP Energy and its affiliates are not affiliated with any franchised public utility, and do not raise any other vertical market power concerns.

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.[3]

Based on your representations, CWP Energy's submittal[4] satisfies the Commission's requirements for market-based rate authority regarding horizontal and vertical market power.

CWP Energy'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

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[2] *Market-Based Rates for Wholesale Sales of Electric Energy, Capacity and Ancillary Services by Public Utilities*, Order No. 697, FERC Stats. & Regs. ¶ 31,252, at P 848-50, *clarified*, 121 FERC ¶ 61,260 (2007), *order on reh'g*, Order No. 697-A, FERC Stats. & Regs. ¶ 31,268, *clarified*, 124 FERC ¶ 61,055, *order on reh'g*, Order No. 697-B, FERC Stats. & Regs. ¶ 31,285 (2008), *order on reh'g*, Order No. 697-C, FERC Stats. & Regs. ¶ 31,291 (2009), *order on reh'g*, Order No. 697-D, FERC Stats. & Regs. ¶ 31,305 (2010), *aff'd sub nom. Montana Consumer Counsel v. FERC*, 659 F.3d 910 (9th Cir. 2011).

[3] Order No. 697, FERC Stats. & Regs. ¶ 31,252 at P 62, 399, 408, 440.

[4] The next time you make a market-based rate filing with the Commission, you must include a revised tariff in compliance with Appendix C – Limitations and Exemptions Regarding Market-Based Rate Authority to include appropriate citations. *Niagara Mohawk Power Corporation,* 121 FERC ¶ 61,275 (2007) at P 8. *See also,* Order No. 697-A, FERC Stats. & Regs. ¶ 31,268 at P 384.

sections 35.12(a), 35.13(b), 35.15 and 35.16 is granted. CWP Energy's request for waiver of Part 41, Part 101, and Part 141 of the Commission's regulations concerning accounting and reporting requirements is granted with the exception of 18 C.F.R. §§ 141.14 and 141.15.[5] Notwithstanding the waiver of the accounting and reporting requirements here, CWP Energy is expected to keep its accounting records in accordance with generally accepted accounting principles.

CWP Energy 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. CWP Energy 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 CWP Energy, compatible with the public interest, and reasonably necessary or appropriate for such purposes.[6]

CWP Energy must file electronically with the Commission Electric Quarterly Reports.[7] CWP Energy 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 in accordance with Order No. 697.[8]

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

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[5] *Citizens Energy Corp*., 35 FERC ¶ 61,198 (1986); *Citizens Power and Light Corp*., 48 FERC ¶ 61,210 (1989) (*Citizens Power*); *Enron Power Marketing, Inc*., 65 FERC ¶ 61,305 (1993), *order on reh'g*, 66 FERC ¶ 61,244 (1994) (*Enron*).

[6] *Citizens Power*, 48 FERC ¶ 61,210; *Enron*, 65 FERC ¶ 61,305.

[7] *Revised Public Utility Filing Requirements,* Order No. 2001, FERC Stats. & Regs. ¶ 31,127, *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 (2003). Attachments B and C of Order No. 2001 describe the required data sets for contractual and transaction information. Public utilities must submit Electric Quarterly Reports to the Commission using the EQR Submission System Software, which may be downloaded from the Commission's website at http://www.ferc.gov/docs-filing/eqr.asp.

[8] *Reporting Requirement for Changes in Status for Public Utilities with Market-Based Rate Authority*, Order No. 652, FERC Stats. & Regs. ¶ 31,175, *order on reh'g*, 111 FERC ¶ 61,413 (2005); 18 C.F.R. § 35.42 (2011).

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 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.

Questions regarding the above order should be directed to:

Federal Energy Regulatory Commission
Attn: Debra Irwin
Phone: (202) 502-6253
Office of Energy Market Regulation
888 First Street, N.E.
Washington, D.C. 20426

Sincerely,

Steve P. Rodgers, Director
Division of Electric Power
Regulation - West

EXHIBIT H – RECEIPT

Receipt from Pay.gov for $500 payment
On June 13, 2025

An official website of the United States government Here's how you know

Pay.gov

MENU

For your security, we recommend you close your browser when you complete your payment.

Payment Confirmation - U.S. Department of Energy General Collections

✓ Before You Begin | ✓ Complete Agency Form | ✓ Enter Payment Info | ✓ Review & Submit | 5 **Confirmation**

Your payment is complete

You will not be able to access this receipt once you leave this page. A confirmation email has been sent to richard.mak@cwpenergy.com.

Because you are not signed in:

This payment will not show in your payment activity. You can sign in or create an account now and Pay.gov will have a record of your payment.

To confirm your payment went through:

Contact the federal government agency you paid. Pay.gov is unable to cancel this transaction.

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Please share it here.

Tracking Information

Pay.gov Tracking ID: 27OT18SE

Agency Tracking ID: 77071428337

Form Name: U.S. Department of Energy General Collections

Application Name: DOE General Collections Form

Payment Information

Payment Type: Debit or credit card

Payment Amount: $500.00

Transaction Date: 06/13/2025 11:11:42 AM EDT

Payment Date: 06/13/2025

Payment Type : Other

Bill Number:

PO Number :

WFO Number:

Other : Export Authorization EA-410-C

Comments: Export Authorization EA-410-C

Account Information

Cardholder Name: Richard Mak

Card Type: Visa

Card Number: **********5759

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