EVERSHEDS SUTHERLAND

**Eversheds Sutherland (US) LLP**
700 Sixth St., NW, Suite 700
Washington, DC 20001-3980

D: +1 202.383.0838
F: +1 202.637.3593

danielfrank@eversheds-sutherland.com

June 18, 2025

***Via Electronic Mail***

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

Re: Application of Morgan Stanley Capital Group Inc. for Renewal of Authorization to Transmit Electricity from the United States to Canada
Docket No. EA-185-__

To whom it may concern:

Please find enclosed for filing on behalf of Morgan Stanley Capital Group Inc. (MSCG) the "Application of Morgan Stanley Capital Group Inc. for Renewal of Authorization to Transmit Electricity from the United States to Canada" as required by 10 C.F.R. § 205.307. In addition, MSCG 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: 77075740146. A copy of the Application is being served contemporaneously upon the Federal Energy Regulatory Commission, as required by 10 C.F.R. § 205.309.

MSCG respectfully requests that the Department grant the requested authorization with an effective date of August 21, 2025, the date on which MSCG's current export authorization expires.

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

Sincerely,

Daniel E. Frank
Allison E. S. Salvia

*Attorneys for Morgan Stanley Capital Group Inc.*

Enclosures

cc: Federal Energy Regulatory Commission

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

| | | |
|---|---|---|
| **Morgan Stanley Capital Group Inc.** | **)** | **Docket No. EA-185-__** |

**APPLICATION OF MORGAN STANLEY CAPITAL GROUP INC.**
**FOR RENEWAL OF AUTHORIZATION TO**
**TRANSMIT ELECTRICITY FROM THE UNITED STATES TO CANADA**

Pursuant to Section 202(e) of the Federal Power Act ("FPA") (16 U.S.C. § 824a(e)) and the regulations promulgated under 10 C.F.R. §§ 205.300, *et seq.* (2025), Morgan Stanley Capital Group Inc. ("MSCG" or "Applicant") hereby requests renewed authorization to transmit electricity from the United States to Canada for a period of five years (or such longer period as may be permitted by the Department).[1] In support of this Application, MSCG respectfully states as follows:

## I. INTRODUCTION

On August 28, 2020, in Order No. EA-185-E, the Department authorized MSCG to export electricity from the United State to Canada as a power marketer for a period of five years ending on August 21, 2025.[2] MSCG hereby requests that the Department renew its authorization to export electricity from the United States to Canada for a five-year period, or such longer period as the Department may authorize for similarly situated power marketers. Consistent with Order No. EA-

[1] *See* 10 C.F.R. § 205.300(a) (2025). On May 16, 2025, the Department issued a Notice of Proposed Rulemaking proposing to amend the application process codified in 10 C.F.R. §§ 205.300 – 309. This Application is consistent with the proposed revisions to 10 C.F.R. § 205.300, which would require that an application requesting authorization to transmit electric energy "include information the applicant deems relevant to DOE's determination under section 202(e) in the Federal Power Act." Application for Authorization to Transmit Electric Energy to a Foreign Country, 90 Fed. Reg. 20826 (May 16, 2025).

[2] *See Morgan Stanley Capital Group Inc.*, "Order Authorizing Electricity Exports to Canada," Order No. EA-185-E (August 28, 2020).

185-E ¶ (K), MSCG files this Application at least 60 days prior to expiration of its current authorization.[3] MSCG's export of electric energy to Canada does not and will not impair the sufficiency of electric supply within the United States nor does it or will it impede or tend to impede the coordination in the public interest of facilities subject to the jurisdiction of the Federal Energy Regulatory Commission ("FERC").

## II. DESCRIPTION OF APPLICANT

Applicant's exact legal name is "Morgan Stanley Capital Group Inc."[4] It does not have any partners,[5] and is not seeking authorization to export power on behalf of, or in conjunction with, any partners or partnership. Communications regarding this Application should be addressed to:[6]

Robert Scherer, *Executive Director and Counsel*
Morgan Stanley & Co. LLC
1585 Broadway, 4th Floor
New York, NY 10036
212-537-1502
Robert.C.Scherer@morganstanley.com

Daniel E. Frank, *Partner*
Allison E. S. Salvia, *Counsel*
Eversheds Sutherland (US) LLP
700 Sixth St., N.W., Suite 700
Washington, DC 20001-3980
202-383-0838
danielfrank@eversheds-sutherland.com
allisonsalvia@eversheds-sutherland.com

MSCG is a Delaware corporation with its principal place of business in New York, New York.[7] MSCG is an indirect, wholly-owned subsidiary of Morgan Stanley. Morgan Stanley, a Delaware corporation, is a publicly-traded global financial services firm that, through its

[3] *See id.* ¶ (K).

[4] *See* 10 C.F.R. § 205.302(a) (2025).

[5] *See* 10 C.F.R. § 205.302(b) (2025).

[6] *See* 10 C.F.R. § 205.302(c) (2025).

[7] *See* 10 C.F.R. § 205.302(d) (2025).

subsidiaries and affiliates, advises and originates, trades, manages, and distributes capital for governments, institutions, and individuals.[8]

MSCG is a power marketer[9] authorized by FERC to make wholesale power sales at market-based rates.[10] In addition to power, MSCG facilitates customer transactions in wholesale natural gas and other physically- and financially-settled energy products. MSCG does not directly own any electric generation or transmission facilities, nor does it hold a franchise or service territory for the transmission, distribution, or sale of electric power. MSCG has rights to certain generation capacity and energy that it has purchased from third parties under long-term contracts,[11] and is affiliated, via common upstream ownership, with certain generation owners, as follows:[12]

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[8] Mitsubishi UFJ Financial Group, Inc. ("MUFG"), owns interests of approximately 24 percent in Morgan Stanley. No other individuals or entities own 10 percent or greater voting interest in Morgan Stanley.

[9] As used herein, the terms "marketer" and "power marketer" mean an entity that buys and sells electric power for its own account.

[10] *See Morgan Stanley Capital Group Inc.*, 69 FERC ¶ 61,175 (1994) (granting market-based rate authority to MSCG), *reh'g denied*, 72 FERC ¶ 61,082 (1995); *see also Sanborn Solar 1A, LLC, et al.*, Docket Nos. ER21-1376-002, *et al.*, Letter Order (Feb. 28, 2025) (unpublished) (most recent letter order accepting notice of change in status of, among others, MSCG and affiliates in Docket Nos. ER10-2906-016, *et al.*); *Morgan Stanley Capital Group Inc., et al.*, Docket Nos. ER10-2906-021, *et al.*, "Updated Market Power Analysis for the Southwest Region and Notice of Change in Status" (filed Dec. 20, 2024) (most recent market power analysis filing by MSCG and affiliates). As noted, the Department previously authorized MSCG to export electricity to Canada. *See Morgan Stanley Capital Group Inc.*, Order No. EA-185 (Aug. 21, 1998); *Morgan Stanley Capital Group Inc.*, Order No. EA-185-A (Aug. 14, 2000); *Morgan Stanley Capital Group Inc.*, Order No. EA-185-B (Aug. 19, 2005); *Morgan Stanley Capital Group Inc.*, Order No. EA-185-C (June 9, 2010); *Morgan Stanley Capital Group Inc.*, Order No. EA-185-D (July 8, 2015); *Morgan Stanley Capital Group Inc.*, Order No. EA-185-E (Aug. 28, 2020).

[11] "Long-term" means a term of a year or longer.

[12] Although the Department's regulations do not specifically require a listing of an applicant's generating facilities, MSCG provides here a brief discussion of the electric generation that it has purchased, controls, and/or is affiliated with so that the Department can be assured that, for the reasons discussed herein, any exports of electricity by MSCG will not impair the sufficiency of the electricity supply in the United States.

- MSCG holds long-term tolling agreements and long-term firm power purchase agreements with generating facilities totaling 952 MW in the Southern Company ("SoCo") balancing authority area ("BAA"). MSCG is also a party to certain power purchase and scheduling agent services agreements with rural electric cooperatives located in Georgia that provide MSCG the right and/or obligation to schedule certain of the cooperatives' resources in the SoCo BAA.

- MSCG has a long-term power purchase agreement with Public Utility District No. 2 of Grant County, Oregon ("GCPD") for a total of 660 MW in the GCPD BAA.

- In the Bonneville Power Administration ("BPA") BAA, MSCG purchases the following amounts of power, under long-term contracts, from the following entities: 43.5 MW from the Eugene (Oregon) Water and Electric Board; 28.2 MW from Cowlitz County PUD; 4.9 MW from The Energy Authority; 580 MW from South California Edison Company; 8 MW from ORNI 50 LLC; 100.7 MW from Sagebrush Power Partners, LLC; 18.8 MW from Peninsula Light Company; and 132.5 MW from Frederickson Power L.P.

- In the California Independent System Operator ("CAISO") BAA, MSCG purchases the following amounts of power, under long-term contracts, from the following entities: 6.56 MW from Shell Energy North America (US), L.P.; 31 MW from Altamont Winds LLC; 37 MW from Tecolote Wind LLC; 44 MW Coso Geothermal Power Holdings, LLC; 11 MW from TGP Energy Management, LLC; 40 MW from Victory Pass I, LLC; 24 MW from Yellow Pine Solar, LLC; 22 MW from Mountain View Power Partners, LLC; 50 MW from Daggett Solar Power 3 LLC; 23 MW from EDPR Scarlet I LLC; 112 MW from Golden Fields Solar III, LLC; 55.83 MW from Tulare Solar Center, LLC; and 62.5 MW from IP Oberon II, LLC.

- MSCG is affiliated through common upstream ownership with Terra-Gen Power Holdings II, LLC ("TGH"), which directly owns or controls approximately 1,861 MW of generation capacity within the CAISO BAA. Approximately 1,368 MW of that capacity is sold to non-affiliated third parties pursuant to long-term, firm agreements. TGH also indirectly owns the following power marketers that are authorized to make wholesale sales of electric energy, capacity, and certain ancillary services at market-based rates solely within the CAISO BAA: TGP Energy Management, LLC, Coachella Hills Wind, LLC, and Voyager Wind IV Expansion, LLC. TGH indirectly owns a 10% or greater voting interest in several entities with market-based rate authority that own or control electric generation facilities and/or battery energy storage systems with an aggregate capacity of 1,946 MW in the CAISO BAA. TGH affiliates also own interests in limited and discrete radial generator lead lines and related facilities that constitute interconnection customer-owned interconnection facilities that connect generation to the transmission grid.

- In the Northwest Energy BAA, MSGC purchases under long-term contracts 189 MW from BHE Rim Rock Wind, LLC; 106.5 MW from BHE Glacier Wind Energy 1; and 103.5 MW from BHE Glacier Wind Energy 2.

- In the Puget Sound Energy BAA, MSGC purchases under a long-term contract 90 MW from the Pacific Gas and Electric Company.

- In the PacifiCorp BAA, MSCG purchases 200 MW from Calpine Energy Services, L.P.

- MSCG also has several direct and indirect subsidiaries that are authorized by FERC to sell power at market-based rates but that do not own any generation or transmission resources.[13]

- MSCG is a party to a scheduling agreement with Deseret Generation & Transmission Cooperative ("Deseret") that provides MSCG the right and/or obligation to schedule certain Deseret resources located in the PacifiCorp BAA.

- MSCG is a party to one of the two transmission service reservation agreements ("TSR Agreements") for the 300 MW of northbound transmission capacity on the MATL line, and, as noted above, is the assignee of the other TSR Agreement. MATL (along with Montana Alberta Tie Ltd.) owns and operates a 214-mile, 230-kV bidirectional AC transmission line, with a rated capacity of 300 MW, extending from Lethbridge, Alberta, Canada to Great Falls, Montana. MATL owns the U.S. portion of the MATL project, which is in the NWE BAA. Service under the TSR Agreements is provided pursuant to FERC-approved negotiated rate authority under a FERC-approved open access transmission tariff ("OATT").[14]

- MSCG is affiliated through common upstream ownership with Bayonne Energy Center, LLC, which owns and operates a 644 MW (nameplate) gas-fired generating facility in the New York Independent System Operator ("NYISO") BAA.

- MSCG is affiliated through common upstream ownership with Zone J Tolling Co., LLC, a power marketer with market-based rate authority in the NYISO BAA.

- MSCG is affiliated through common upstream ownership with Red Oak Power, LLC, which owns and operates an 821.1 MW (nameplate) electric generation facility (the "Red Oak Facility"). The Red Oak Facility interconnects with the transmission system owned by Jersey Central Power & Light Company and controlled by PJM Interconnection, L.L.C. ("PJM").

- MSCG is affiliated through common upstream ownership with Loraine Windpark Project, LLC, a 150 MW wind generating facility located and selling power within the Electric Reliability Council of Texas ("ERCOT") region.

MSCG is also affiliated, via common upstream ownership and control, with other entities that have passive investment interests in electric generating facilities and associated

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[13] *See, e.g.*, *Morgan Stanley Energy Structuring, L.L.C.*, Docket No. ER19-1716-000 (June 17, 2019) (letter order issued accepting name change of Power Contract Financing II, L.L.C. to MSES).

[14] *See MATL LLP, et al.*, 170 FERC ¶ 61,297 (2020) (reauthorizing negotiated rate authority for MATL); MATL LLP, 147 FERC ¶ 61,010 (2014) (accepting MATL OATT).

interconnection facilities. MSCG's parent company Morgan Stanley also owns, indirectly through other of its wholly-owned subsidiaries, behind-the-meter solar installations that provide power to on-site, behind-the-meter load for commercial and residential properties, located primarily in California. Morgan Stanley also indirectly owns, through Morgan Stanley Renewables Inc., a passive, non-controlling, tax equity membership interest in OPC LLC, which owns four geothermal Qualifying Facilities located in Nevada.[15]

Other than the facilities described above, neither MSCG 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. MSCG operates as a power marketer, sells and buys electric power at wholesale, and arranges services in related areas. MSCG has purchased, or will purchase, the power that may be exported to Canada from wholesale generators, electric utilities, and federal power marketing agencies. MSCG will have title to any electricity transmitted to Canada under the authorization sought in this Application. This Application relates to MSCG as a marketer of electric power only.

## III. JURISDICTION

The Department has jurisdiction over the action proposed in this Application under FPA § 202(e).[16] No other known federal, state, or local government has jurisdiction over the action to be taken under the authority sought in this Application,[17] except to the extent that MSCG must comply with applicable FERC requirements in making sales at wholesale. FERC's address is:

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[15] The Qualifying Facilities include Steamboat Hills, LLC (one 15 MW facility and one 10 MW facility); ORNI 3, LLC (a 21.5 MW facility) and ORNI 14, LLC (a 22.2 MW facility).

[16] *See* 16 U.S.C. § 824a(e).

[17] *See* 10 C.F.R. § 205.302(e) (2025).

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

## IV. FACILITIES

MSCG is seeking to renew its authorization to export 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, including the facilities set forth in Attachment 1.[18]

## V. TECHNICAL DISCUSSION

MSCG plans to export electric power over authorized transmission interconnections between Canada and the United States. Transmission to the point of delivery will be arranged by MSCG over any authorized existing international electric transmission facilities (including those set out in Attachment 1), and over any international transmission facilities that may be approved by the Department in the future.

MSCG 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.[19] MSCG has purchased, or will purchase, the electric power that it may export, on either a firm or an interruptible basis, from wholesale generators, electric utilities, and federal power marketing agencies voluntarily, and therefore will be surplus to the needs of the selling entities. Accordingly, the proposed exports will not impair or tend to impede the sufficiency of electric power supplies in the United States or the regional

[18] *See* 10 C.F.R. § 205.302(f) (2025).

[19] Please see Section II, *supra*, for a discussion of MSCG's interests in generating facilities.

coordination of electric utility planning or operations.[20] Additionally, as a power marketer that does not own or operate a transmission system (and therefore must acquire transmission service under open access transmission and similar tariffs), MSCG does not have the ability to cause a violation of the terms and conditions in the existing authorizations associated with international transmission facilities. Specifically, MSCG does not have the ability to cause total exports on Presidential Permit facilities to exceed the authorized instantaneous transmission rate.

MSCG 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. MSCG agrees to abide by the export limits contained in the relevant export authorization of any transmission facilities over which MSCG 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 MSCG would not impede or tend to impede the coordinated use of transmission facilities within the meaning of FPA § 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 that takes into consideration the unique nature of

[20] *See* 10 C.F.R. § 205.302(g) (2025).

power marketers and previously authorized export limits of cross-border facilities.[21] These same considerations demonstrate that MSCG'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.

## VI. CONSISTENCY WITH LEGAL REQUIREMENTS

Authorization of the exports proposed by MSCG is consistent with United States energy policy and will foster development of a more efficient and competitive North American energy market. MSCG 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.

Because the proposed exports will occur over existing transmission facilities, MSCG respectfully submits that the Application qualifies for a categorical exclusion under the National

[21] *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); *Enron Power Marketing, Inc.*, No. EA-102 (Feb. 6, 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 Capital Group Inc.*, No. EA-185-D (July 8, 2015); *Northland Power Energy Marketing (US) Inc.*, No. EA-473 (June 18, 2019); *Macquarie Energy LLC*, Np. 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).

Environmental Policy Act of 1969, such that neither an Environmental Agreement nor an Environmental Impact Statement is required.[22]

Finally, MSCG 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.

## VII. EXHIBITS

MSCG includes the following Exhibits with this Application:

- Exhibit A (10 C.F.R. § 205.303(a)) – Export Agreements. MSCG is the customer under the two TSR Agreements for 300 MW of the northbound capacity on the MATL line in the NWE BAA. The TSR Agreements are service agreements entered into under, and are governed by, the FERC-approved MATL open access transmission tariff ("OATT") and publicly available on the Open Access Same-Time Information System ("OASIS"). To the extent necessary, MSCG requests a waiver of the requirement to provide a copy of the two TSR Agreements with this Application.

- 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 MSCG's corporate power and that MSCG will comply with all pertinent federal and state laws.

- Exhibit C (10 C.F.R. § 205.303(c)) – Maps. Not Applicable. MSCG has no "system" of its own to export electricity. Therefore, no maps are available to

[22] The Department previously determined that MSCG qualified for a NEPA categorical exclusion. *See Morgan Stanley Capital Group Inc.*, Order No. EA-185-E at 9-10 (Aug. 28, 2020).

include as Exhibit C. Additionally, as described above, MSCG requests renewal of its authorization 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. MSCG has offices in the United States and 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. MSCG 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.-Canadian border authorized for third-party use is attached to this Application as Attachment 1.

- Attachment 2 – Verification. MSCG has attached as Attachment 2 a signed verification of the factual representations in this Application.[23]

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

## VIII. CONCLUSION

In order to maintain all regulatory authorizations for participation in emerging market opportunities, Morgan Stanley Capital Group Inc. respectfully requests that the Department grant this Application and issue the requested reauthorization by no later than August 21, 2025, the date MSCG's current authorization is set to expire.

Respectfully submitted,

____________________________

Daniel E. Frank
Allison E. S. Salvia
Eversheds Sutherland (US) LLP
700 Sixth St., N.W., Suite 700
Washington, DC 20001-3980
(202) 383-0838
danielfrank@eversheds-sutherland.com
allisonsalvia@eversheds-sutherland.com

*Attorneys for Morgan Stanley Capital Group Inc.*

Date: June 18, 2025

[23] *See* 10 C.F.R. § 205.302(h) (2025); 28 U.S.C. § 1746.

**EXHIBITS A, C, D, E, and F**

**(NOT APPLICABLE)**

# EXHIBIT B

# OPINION OF COUNSEL

Morgan Stanley

*MORGAN STANLEY CAPITAL GROUP INC.*
*1585 Broadway*
*NEW YORK, NY 10036*

June 18, 2025

United States Department of Energy
Office of Electricity
Washington, DC

Re: Application of Morgan Stanley Capital Group Inc. for Renewal of Authorization to Transmit Electric Energy from the United States to Canada
(Docket No. EA-185)

Ladies and Gentlemen:

I am counsel to Morgan Stanley Capital Group Inc., a Delaware corporation ("MSCG"), and have represented MSCG in connection with the Application of Morgan Stanley Capital Group Inc. for Renewal of Authorization to Transmit Electricity from the United States to Canada (the "Application"). I am an attorney-at-law, authorized to practice law in the State of New York. I am employed as General Counsel of MSCG.

I have examined such corporate records, certificates and other documents, and such questions of law, as I have considered necessary or appropriate for the purposes of this opinion. Upon the basis of such examination and as of the date hereof, it is my opinion that:

(1) MSCG is duly incorporated, validly existing, and in good standing under the laws of the State of Delaware.

(2) MSCG has the corporate power and authority to engage in the exportation of electric energy as described in the Application.

(3) Based upon my knowledge of the facts and the law, including as a result of my consultation with outside counsel, following the issuance of the authorization sought in the Application, MSCG shall have complied with all Federal and state laws applicable to the export of electric energy as requested in the Application.

The foregoing opinion is limited to the Federal laws of the United States, the laws of the State of New York and the General Corporation Law of the State of Delaware as of the date hereof, and I am expressing no opinion as to the effect of the laws of any other jurisdiction.

In rendering this opinion, I have relied as to certain matters on information obtained from public officials, officers of MSCG and other sources believed by me to be responsible, and I have assumed that the signatures on all documents examined by me are genuine, assumptions which I have not independently verified.

I am furnishing this opinion solely for your benefit in connection with the Application. This opinion may not be relied upon by you for any other purpose or relied upon by or furnished to any other person without my express written consent.

Very truly yours,

Robert Scherer

Robert Scherer

Dated: June 18, 2025

**ATTACHMENT 1**

**Transmission Facilities Located at the U.S. – Canadian Border 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<br>Nelway, WA<br>Nelway, WA | 2-500-kV<br>230-kV<br>230-kV | PP-10<br>PP-36<br>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, Ml<br>Marysville, Ml<br>St. Claire, Ml<br>St. Claire, Ml | 230-kV<br>230-kV<br>230-kV<br>345-kV | PP-230<br>PP-230<br>PP-230<br>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<br>Fort Fairfield, ME<br>Madawaska,ME<br>Aroostook, ME<br>Easton, ME | 69-kV<br>69-kV<br>138-kV<br>2-69-kV<br>7.2-kV | PP-497<br>PP-497<br>PP-498<br>PP-498<br>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<br>Massena, NY<br>Niagara Falls, NY<br>Devils Hole, NY | 765-kV<br>2-230-kV<br>2-345-kV<br>230-kV | PP-56<br>PP-25<br>PP-74<br>PP-30 |
| Niagara Mohawk Power Corp. | Devils Hole, NY | 230-kV | PP-190 |
| Northern States Power Company | Red River, ND<br>Roseau County, MN<br>Rugby, ND | 230-kV<br>500-kV<br>230-kV | PP-45<br>PP-63<br>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 |

* As described in the Application, MSCG requests authority to export electricity over any authorized international transmission facility, including but not limited to those set forth in this Attachment 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.

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

# ATTACHMENT 2

## Verification

# VERIFICATION

STATE OF NEW YORK )<br>
)<br>
CITY OF NEW YORK )

**<u>Declaration Under Penalty of Perjury</u>**
**(28 U.S.C. § 1746)**

I, Robert Scherer, as General Counsel of Morgan Stanley Capital Group Inc. ("MSCG"), am authorized to provide this verification on behalf of MSCG and have knowledge of the matters set forth in the foregoing Application of Morgan Stanley Capital Group Inc. for Renewal of Authorization to Transmit Electricity from the United States to Canada. I hereby verify under penalty of perjury that the foregoing Application is true and correct.

Executed on June 18, 2025

Robert Scherer

Robert Scherer
General Counsel