

BRACEWELL

December 12, 2025

VIA EMAIL

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

Re: TransAlta Energy Marketing (U.S.) Inc.
Renewal Application for Authorization to Transmit Electric Energy to Canada,
GDO Docket No. EA-216-F

To Whom It May Concern:

Enclosed for filing on behalf of TransAlta Energy Marketing (U.S.) Inc. ("TEMUS") is a scanned original of TEMUS' Application for Renewal of Authorization to export electricity from the United States to Canada and related exhibits.

TEMUS has made payment in the amount of \$500.00 as the filing fee for the application by credit card to the DOE, as per your instructions.

A copy of the Application is being served contemporaneously upon the Federal Energy Regulatory Commission, as required by 10 C.F.R. § 205.309.

If you have any questions regarding this filing, or if you require additional information please contact me at 202-828-5879.

Very truly yours,

Bracewell LLP

/s/ Catherine P. McCarthy

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Enclosures

cc: Federal Energy Regulatory Commission

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

TransAlta Energy Marketing (U.S.) Inc.

GDO Docket No. EA-216-F

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

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Dated: December 12, 2025

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

Pursuant to Section 202(e) of the Federal Power Act ("FPA"), 16 U.S.C. § 824(e) (2006), and Part 205, Subpart W of the U.S. Department of Energy's (the "DOE") regulations, 10 C.F.R. § 205.300, et seq., TransAlta Energy Marketing (U.S.) Inc. ("TEMUS" or "Applicant") hereby requests renewal of its authorization to transmit electric energy from the United States to Canada for a period of five years ("Renewal Application"). DOE previously renewed TEMUS' authorization to export electric energy from the U.S. to Canada as a power marketer on April 27, 2021 in Order No. EA-216-E.¹ TEMUS' authorization to transmit electricity to Canada expires on May 17, 2026. TEMUS respectfully requests that authorization be granted for an additional term of five years beginning on or before May 17, 2026 in order to avoid any lapse in authority to transmit electricity to Canada. In support of this Renewal Application, TEMUS respectfully states as follows:

¹ *TransAlta Energy Marketing (U.S.) Inc.*, No. EA-216-E (April 27, 2021).

I.
DESCRIPTION OF THE APPLICANT

The exact legal name of the Applicant is TransAlta Energy Marketing (U.S.) Inc. TEMUS is a Delaware corporation with its principal place of business at 913 Big Hanaford Road, Centralia, Washington 98531-9111, and is currently authorized to do business in numerous states.²

On August 31, 1999, DOE issued Order No. EA 216 authorizing TEMUS to transmit electric energy from the United States to Canada as a power marketer.³ In 2001, 2006, 2011, 2016 and 2021 in Order Nos. EA-216-A,⁴ EA-216-B,⁵ EA-216-C,⁶ EA-216-D,⁷ and EA-216-E,⁸ DOE renewed TEMUS' authorization to export electric energy to Canada for five-year terms. TEMUS' current authorization to export electric energy to Canada expires on May 17, 2026.⁹

TEMUS is a power marketer with authorization from the Federal Energy Regulatory Commission ("FERC") to market electric energy and capacity at wholesale pursuant to market-based rate authorization granted by letter order issued on June 25, 1998, in FERC Docket No. ER98-3184-000.¹⁰ TEMUS is an indirect subsidiary of

² District of Columbia, Maryland, Nevada, New York, Oregon, Texas, Washington, Idaho, Utah, Colorado, Wyoming, New Mexico, Connecticut, Illinois, California, Minnesota, Michigan, Arizona, Maine, Massachusetts, New Hampshire, West Virginia, Ohio, Mississippi, Pennsylvania, Rhode Island, Louisiana, Virginia, Indiana, Wisconsin, and Missouri.

³ *TransAlta Energy Marketing (U.S.) Inc.*, No. EA-216 (August 31, 1999).

⁴ *TransAlta Energy Marketing (U.S.) Inc.*, No. EA-216-A (August 16, 2001).

⁵ *TransAlta Energy Marketing (U.S.) Inc.*, No. EA-216-B (May 17, 2006).

⁶ *TransAlta Energy Marketing (U.S.) Inc.*, No. EA-216-C (May 17, 2011) ("Order No. EA-216-C").

⁷ *TransAlta Energy Marketing (U.S.) Inc.*, No. EA-216-D (April 29, 2016) ("Order No. EA-216-D").

⁸ *TransAlta Energy Marketing (U.S.) Inc.*, No. EA-216-E (April 27, 2021).

⁹ *Id.*

¹⁰ *TransAlta Energy Marketing (U.S.) Inc.*, Docket No. ER98-3184-000 (June 25, 1998) (delegated letter order).

TransAlta Corporation ("TAC"), a publicly traded Canadian corporation with headquarters in Calgary, Alberta.

In addition, TAC holds a 100% direct interest in TransAlta Energy Marketing Corp., a Canadian business corporation, which was granted market-based rate authority by FERC on April 30, 2009, in FERC Docket No. ER09-884-000.¹¹

TAC also indirectly holds a 100% interest in Heartland Generation Ltd. ("Heartland"), a Canadian business corporation, which was granted market-based rate authority in the Northwest Region by FERC on October 8, 2021, in FERC Docket No. ER21-2712-000.¹² On December 20, 2021, DOE issued Order No. EA-492 authorizing Heartland to transmit electric energy from the United States to Canada as a power marketer for a five-year term.¹³ Heartland's current authorization to export electric energy to Canada expires on December 20, 2026.

In addition, through various subsidiaries, TAC is engaged in the development, financing, acquisition, ownership, and operation of independent power production facilities, and the wholesale marketing of electricity in the United States. TAC indirectly holds a 100% interest in TransAlta Centralia Generation LLC ("TCG"), a Washington limited liability company with a coal-fired electric generation facility located in Centralia, Washington. TCG is an exempt wholesale generator ("EWG") pursuant to a letter order issued by FERC on February 25, 2000, in FERC Docket No. EG00-49-000, and TCG

¹¹ *TransAlta Energy Marketing Corp.*, Docket No. ER09-884-000 (Apr. 30, 2009) (delegated letter order).

¹² *Heartland Generation Ltd.*, Docket No. ER21-2712-000 (Oct. 8, 2021) (delegated letter order).

¹³ *Heartland Generation Ltd.*, No. EA-492 (December 20, 2021).

holds market-based rate sales authority as granted December 16, 1999 in FERC Docket No. ER00-494-000.

TAC also indirectly holds a 100% interest in TransAlta Wyoming Wind LLC (“TWW”), a Delaware limited liability company with a wind-powered electric generating facility located in Uinta County, Wyoming. TWW is an EWG pursuant to a letter order issued by FERC on August 5, 2003, in FERC Docket No. EG03-75-000,¹⁴ and TWW holds market-based rate sales authority originally granted on September 10, 2003 in Docket No. ER03-1025.¹⁵

TAC also indirectly holds a 100% interest in Lakeswind Power Partners, LLC (“Lakeswind”), a Delaware limited liability company with a wind-powered electric generating project located in Clay, Becker and Otter Tail Counties, Minnesota. Lakeswind is an EWG pursuant to a letter order issued by FERC on January 9, 2014 in FERC Docket No. EG14-12-000,¹⁶ and was granted market-based rate authorization by FERC on November 4, 2013 in Docket No. ER13-2386-000.¹⁷

TAC also indirectly holds a 100% interest in Skookumchuck Dam, LLC, a Washington limited liability company with a 1 MW hydroelectric facility located in the

¹⁴ See *FPL Energy Wyoming, LLC*, 104 FERC ¶ 62,088 (2003) (granting EWG status to TWW’s predecessor, FPL Energy Wyoming, LLC).

¹⁵ See *FPL Energy Wyoming, LLC*, Docket Nos. ER03-1025-000 and ER03-1025-001 (Sept. 10, 2003) (letter order granting MBR authority to TWW’s predecessor, FPL Energy Wyoming, LLC). On January 8, 2014, as amended on January 31, 2014, TWW filed a revised market-based rate tariff reflecting the name change of FPL Energy Wyoming, LLC to TransAlta Wyoming Wind LLC. On March 27, 2014, FERC issued a letter order accepting the notice of succession and tariff revisions. *TransAlta Wyoming Wind LLC*, Docket Nos. ER14-963-000 and ER14-963-001 (Mar. 27, 2014) (letter order accepting notice of succession and tariff revisions).

¹⁶ See *Burgess Biopower LLC, et al.*, Docket Nos. EG14-1-000, *et al.* (Jan. 9, 2014) (unpublished blanket letter order providing notice of effectiveness of EWG status for Lakeswind in Docket No. EG14-12-000).

¹⁷ *Lakeswind Power Partners, LLC*, ER13-2386-000 (Nov. 4, 2013) (unpublished letter order granting market-based rate authority).

vicinity of Centralia, Washington. Skookumchuck Dam is self-certified as a Qualifying Facility in FERC Docket No. QF05-1-000.

TAC also indirectly holds a 100% interest in Big Level Wind LLC (“Big Level”), a Delaware limited liability company with a wind-powered electric generating facility located in Potter County, Pennsylvania. Big Level is an EWG pursuant to a letter order issued by FERC on May 8, 2019 in FERC Docket No. EG19-58-000,¹⁸ and was granted market-based rate authorization by FERC on August 27, 2018 in Docket No. ER18-1984-000.¹⁹

TAC also indirectly holds a 100% interest in Antrim Wind Energy LLC (“Antrim”), a Delaware limited liability company with a wind-powered electric generating facility located in Hillsborough County, New Hampshire. Antrim is self-certified as a QF in FERC Docket No. QF19-1361-000,²⁰ and was granted market-based rate authorization by FERC on June 19, 2019 in Docket No. ER19-1889-000.²¹

TAC also indirectly holds a 100% interest in Ada Cogeneration LLC (“Ada”), a Delaware limited liability company with a combined-cycle, natural gas-fired cogeneration facility located in Kent County, Michigan. Ada is self-certified as a QF in FERC Docket No. QF87-529-007.²²

TAC also holds a 49% passive interest in Skookumchuck Wind Energy Project, LLC (“Skookumchuck Wind”), through its indirect subsidiary, TA Skookumchuck Wind

¹⁸ *Hillcrest Solar I, LLC, et al.*, Docket Nos. EG19-54-000, et al. ((May 8, 2019) (unpublished blanket letter order providing notice of effectiveness of EWG status for Big Level Wind LLC in Docket No. EG14-12-000).

¹⁹ *Big Level Wind LLC*, Docket No. ER18-1948-000 (Aug. 27, 2018) (unpublished letter order granting *market-based* rate authority).

²⁰ *Antrim Wind Energy LLC*, Form 566, Docket No. QF19-1361-000 (filed July 12, 2019).

²¹ *Antrim Wind Energy LLC*, Docket No. ER19-1889-000 (June 19, 2019) (unpublished letter order granting *market-based* rate authority).

²² *Ada Cogeneration LLC*, Docket No. QF87-529-007 (Jan. 19, 1988) (Order granting application for certification as QF in QF87-529-000).

Holdings LLC, a Washington limited liability company with a wind-powered electric generating facility located in Lewis and Thurston Counties, Washington. Skookumchuck Wind is self-certified as an EWG in FERC Docket No. EG20-17-000,²³ and was granted market-based rate authorization by FERC on December 16, 2019 in Docket No. ER20-280-000.²⁴

TAC also indirectly holds a 100% interest in White Rock Wind East, LLC (“White Rock East”), a Delaware limited liability company with a wind-powered electric generating facility located in Caddo County, Oklahoma. White Rock East is an EWG pursuant to a letter order issued by FERC on December 6, 2023 in FERC Docket No. EG23-277-000,²⁵ and was granted market-based rate authorization by FERC on October 30, 2023 in Docket No. ER23-2750-000.²⁶

TAC also indirectly holds a 100% interest in White Rock Wind West, LLC (“White Rock West”), a Delaware limited liability company with a wind-powered electric generating facility located in Caddo County, Oklahoma. White Rock West is an EWG pursuant to a letter order issued by FERC on December 6, 2023 in FERC Docket No. EG23-277-000,²⁷

²³ *Poseidon Solar, LLC, et al.*, Docket No. EG20-1-000, *et al.* (Jan. 15, 2020) (unpublished blanket letter order providing notice of effectiveness of EWG status for Skookumchuck Wind Energy Project, LLC in Docket No. EG20-17-000).

²⁴ *Skookumchuck Wind Energy Project, LLC*, Docket No. ER20-280-000 (Dec. 16, 2019) (unpublished letter order granting market-based rate authority).

²⁵ *River Ferry Solar LLC et al.*, Notice of Effectiveness of Exempt Wholesale Generator Status, Docket No. EG23-277-000 *et al.* (Dec. 6, 2023) (providing notice that White Rock East’s EWG status became effective by operation of the Commission’s regulations, 18 C.F.R. § 366.7(a)).

²⁶ *Horizon Hill Wind, LLC, et al.*, Docket No. ER23-2750-000 *et al.* (Oct. 20, 2023) (delegated letter order) (accepting White Rock East’s market-based rate tariff).

²⁷ *River Ferry Solar LLC et al.*, Notice of Effectiveness of Exempt Wholesale Generator Status, Docket No. EG23-277-000 *et al.* (Dec. 6, 2023) (providing notice that White Rock West’s EWG status became effective by operation of the Commission’s regulations, 18 C.F.R. § 366.7(a)).

and was granted market-based rate authorization by FERC on October 30, 2023 in Docket No. ER23-2750-000.²⁸

Further, TAC also indirectly holds a 100% interest in Horizon Hill Wind, LLC (“Horizon Hill”), a Delaware limited liability company with a wind-powered electric generating facility located in Logan County, Oklahoma. Horizon Hill is an EWG pursuant to a letter order issued by FERC on December 6, 2023 in FERC Docket No. EG23-277-000,²⁹ and was granted market-based rate authorization by FERC on October 30, 2023 in Docket No. ER23-2750-000.³⁰

Apart from Heartland Generation Ltd., none of TEMUS' affiliates currently holds or is seeking authorization to export electricity to Canada.

Finally, Eagle Canada Common Holdings LP (“Eagle Canada Common Holdings”) and BIF IV Eagle NR Carry LP (“BIF IV Eagle NR Carry” and, together with Eagle Canada Common Holdings, the “Shareholders”) currently own, in aggregate, approximately 9% of the common shares of TAC. Each of the Shareholders is managed and controlled by a general partner that is an affiliate of Brookfield Corporation (“Brookfield”). Brookfield also maintains two independent directors on the TAC Board of Directors. Importantly, while Brookfield has power marketing affiliates and subsidiaries which may hold authorization to transmit electric energy from the United States to Canada as a power marketer, there is no coordination between the direct and indirect affiliates of TAC and those of Brookfield.

²⁸ *Horizon Hill Wind, LLC, et al.*, Docket No. ER23-2750-000 et al. (Oct. 20, 2023) (delegated letter order) (accepting White Rock West’s market-based rate tariff).

²⁹ *River Ferry Solar LLC et al.*, Notice of Effectiveness of Exempt Wholesale Generator Status, Docket No. EG23-277-000 et al. (Dec. 6, 2023) (providing notice that Horizon Hill’s EWG status became effective by operation of the Commission’s regulations, 18 C.F.R. § 366.7(a)).

³⁰ *Horizon Hill Wind, LLC, et al.*, Docket No. ER23-2750-000 et al. (Oct. 20, 2023) (delegated letter order) (accepting Horizon Hill’s market-based rate tariff).

II.
COMMUNICATIONS

Communications regarding this Renewal Application should be addressed to the following:

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III.
JURISDICTION

The authority requested of DOE by TEMUS is a necessary condition for exporting under section 202(e) of the FPA which provides that the DOE is the sole agency with jurisdiction over the proposed export of electric energy to Canada. DOE's Office of Electricity formerly held the authority to regulate the export of electric energy to a foreign

country pursuant to section 202(e) and 202(f) of the FPA.³¹ This authority was delegated to DOE's Grid Deployment Office.³²

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

IV. RENEWAL AUTHORIZATIONS AND TECHNICAL DISCUSSION

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

Pursuant to Section 202(e) of the FPA, before DOE grants authorization to export electricity, it first evaluates the impact of the export on the reliability of the U.S. electric system. DOE approves an application to export electricity unless it finds that "the proposed transmission would impair the sufficiency of electric supply within the United States," or that "the proposed transmission ... would impede or tend to impede the

³¹ See Redelegation Order No. S4-DEL-OE1-2021-2 (rescinded).

³² See Delegation Order No. S1-DEL-S3-2023; Redelegation Order No. S3-DEL-GD1-2023. A new hierarchical chart posted by DOE on November 20, 2025 shows that the Grid Deployment Office is no longer listed as part of the organization, which is now expected to be absorbed by the Office of Critical Minerals and Energy Innovation. However, it appears regulatory authority over the export of electric energy to a foreign country pursuant to section 202(e) and 202(f) of the FPA has yet to be redelegated within DOE as of the date of submittal of this Application.

coordination in the public interest of facilities subject to the jurisdiction of the Commission." 16 U.S.C. § 824(e). In applying these two criteria to requests for export authorizations submitted by electric power marketers such as TEMUS, DOE has declined to follow a rigid application of the information filing requirements set forth in DOE's regulations and instead has used a flexible approach to account for the unique nature of power marketers.³³

TEMUS does not own any electric generation or transmission facilities and, as a power marketer, does not hold a franchise or service territory or native load obligation. Moreover, none of TEMUS' affiliates owns any electric transmission facilities other than generator interconnection facilities³⁴ and TEMUS is not affiliated with an entity that holds a franchise or service territory. Thus, TEMUS has no "transmission system" of its own on which power exports could have a reliability or stability impact.

Specifically, with respect to the first criterion used to analyze applications to export electricity, TEMUS is a power marketer that will export electricity purchased from electric

³³ See, e.g., *Morgan Stanley Capital Group Inc.*, No. EA-185-A-CN (Aug. 14, 2000); *NorAm Energy Servs., Inc.*, No. EA-105-CN (Aug. 16, 1996); *MidCon Power Servs. Corp.*, No. EA-114 (July 15, 1996); *USGen Power Servs.*, No. EA-112 (June 27, 1996); *CNG Power Servs. Corp.*, No. EA-110 (June 20, 1996); *Destec Power Servs., Inc.*, No. EA-113 (May 31, 1996).

³⁴ TEMUS notes, however, that an affiliate, TransAlta Generation Partnership ("TGP"), owns transmission facilities located entirely within the Province of Alberta, Canada. TGP's facilities are subject to the control of the Alberta Electric System Operator ("AESO"), an Independent System Operator that provides open access and non-discriminatory transmission service pursuant to the AESO transmission tariff, mitigating any vertical market power concerns. See, e.g., *ENMAX Energy Marketing, Inc.* 109 FERC ¶ 61,143 (2004) (accepting updated market power analysis for filing and acknowledging that the AESO provides open access and non-discriminatory transmission service); *TransAlta Enterprises Corporation*, 75 FERC ¶ 61,268 at 61,875 (1996) (concluding that the general form of open access transmission arrangements in Alberta effectively mitigate any transmission market power concerns and meet the general principles of transmission comparability in Order No. 888) and *ENMAX Energy Marketing, Inc.*, Docket No. ER01-2508-003 (Feb. 12, 2009) (letter order accepting updated market power analysis and acknowledging that the AESO provides open access and nondiscriminatory transmission service).

utilities, federal power marketing agencies, qualifying cogeneration and small power production facilities, independent power producers, and other sellers. As DOE has recognized, the "power purchased by a power marketer is, by definition, surplus to the needs of the selling entities" and "[w]ith no native load obligations, the power marketer is free to sell its power portfolio on the open market domestically or as an export."³⁵ Thus, an export of electricity "occurring under such circumstances" would not impair the sufficiency of electric supply within the U.S.³⁶

DOE has interpreted the second criterion used to analyze applications to export electricity "primarily as an issue of the operational reliability of the domestic electric transmission system."³⁷ As noted above, TEMUS does not own or control any electric power supply system in the United States. Additionally, in making the necessary commercial arrangements and obtaining transmission capacity necessary to export electricity under the authorization requested herein, TEMUS will comply with existing industry procedures for obtaining transmission capacity, including reserving transmission service in accordance with FERC's Open-Access Same-Time Information System ("OASIS") and scheduling delivery of the export with the appropriate Regional Transmission Organization(s) or Independent System Operator(s) and/or Balancing Authority areas.

Additionally, the DOE has consistently found that the "power purchased by a power marketer is, by definition, surplus to the needs of the selling entities" and "[w]ith no native load obligations, the power marketer is free to sell its power portfolio on the open market

³⁵ Order No. EA-216-D at 2.

³⁶ *Id.* See also *Powerex Corp.*, No. EA-171-E at 6-7 (Sept. 10, 2020).

³⁷ Order No. EA-216-D at 2.

domestically or as an export.”³⁸ Accordingly, DOE has routinely granted export authorization to power marketers, even those with affiliates owning electric generation facilities and serving native load obligations.³⁹ The DOE has not considered power marketers’ affiliated generation as part of its scope of review for applications for export authorization pursuant to FPA Section 202(e), and there is no need for it to do so in order to perform its statutory obligation as directed by Congress.

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

V. CONSISTENCY WITH LAWS

Authorization of the exports proposed by TEMUS is consistent with the United States–Mexico–Canada Agreement (“USMCA”), the replacement to NAFTA, and U.S. energy policy and will foster development of a more efficient and competitive North American energy market. TEMUS will conduct all operations pursuant to this Authorization in accordance with the provisions of the FPA and pertinent rules, regulations and orders adopted or issued thereunder, and in conformity with the reliability criteria, standards and guidelines of the NERC, regional reliability councils, and Balancing

³⁸ See, e.g., Order No. EA-216-C at 2.

³⁹ See, e.g., *Brookfield Renewable Trading and Marketing LP*, Order No. EA-465-A at 3 (Mar. 25, 2024); *Luminant Energy Co., LLC*, Order No. EA-472-A at 2 (May 30, 2024); *Boston Energy Trading and Marketing LLC*, Order No. EA-464-A at 2-3 (Feb. 21, 2024); *ENGIE Energy Marketing NA, Inc.*, Order No. EA-508 at 2 (June 24, 2024).

Authorities, including any applicable regional transmission organizations or independent system operators. Compliance with these statutes, rules, regulations, and orders will ensure that the proposed transmission will not impede or tend to impede the regional coordination of electric utility planning or operation.

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

VI. PROCEDURAL ISSUES

If required by DOE, TEMUS agrees to abide by general conditions consistent with those set forth in TEMUS' existing DOE electricity export authorizations, as applicable.⁴⁰ TEMUS respectfully submits that it satisfies the requirements of Section 202(e) of the FPA and Part 205, Subpart W of DOE's regulations applicable to applications for authorization to transmit electric energy from the United States to Canada. TEMUS respectfully requests waiver of the requirement to file this Renewal Application six months in advance of the authorization requested herein to allow issuance of an order renewing TEMUS' authorization to transmit electric energy to Canada on or before May 17, 2026, when TEMUS' current authorization expires. TEMUS also requests any additional waivers deemed necessary for DOE to issue the order requested herein.

⁴⁰ See, e.g., Order No. EA-216-D at 5-13.

VII.
EXHIBITS

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

Exhibit A: Agreements

(Not Applicable)

Exhibit B: Legal Opinion of TEMUS' Counsel

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

Exhibit D: Irrevocable Limited Power of Attorney

(Not Applicable)

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

(Not Applicable)

Exhibit F: Operating Procedures Regarding Available Capacity and Energy

(Not Applicable)

Exhibit G: Verification

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

Pursuant to the requirement of 10 C.F.R. § 205.309, a copy of this Renewal Application is being provided to:

Federal Energy Regulatory Commission
Office of the Secretary
888 First Street, N.E.
Washington, DC 20426

VIII.
CONCLUSION

For the foregoing reasons, TEMUS respectfully requests that the DOE issue an order renewing TEMUS' authorization to transmit electric energy to Canada for a period of five years, effective upon issuance of the order but no later than May 17, 2026.

Respectfully submitted,
/s/ Catherine P. McCarthy

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December 12, 2025

EXHIBIT A

Agreements

(Not Applicable)

EXHIBIT B

Opinion of Legal Counsel

LEGAL OPINION

The following opinion is given in support of the Renewal Application of TransAlta Energy Marketing (U.S.) Inc. for Renewal of Authorization to Transmit Electric Energy to Canada, which was originally granted in Order No. EA-216 and renewed by Order Nos. EA-216-A, EA-216-B, EA-216-C, EA-216-D, and EA-216-E dated December 11th, 2025.

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



Kelly Galloway
Director, Corporate Legal
TRANSALTA CORPORATION

EXHIBIT C

Transmission System Information

International Electric Transmission Facilities for TEMUS Exports to Canada

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

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

² Currently under construction and not yet operational as of December 2025.

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

	Niagara Falls, NY Devils Hole, NY	2-345-kV 230-kV	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 ⁴
TDI New England	Alburgh, VT	±320-kV DC	PP-400 ⁵
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
Versant Power	Fort Fairfield, ME Madawaska, ME Easton, ME Baileyville, ME	69 kV 138 kV 7.2 kV 345 kV	PP-497 PP-498 PP-499 PP-500

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

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

EXHIBIT D

Irrevocable Limited Power of Attorney

(Not Applicable)

EXHIBIT E

Statement of Corporate Relationships

(Not Applicable)

EXHIBIT F

Operating Procedures

(Not Applicable)

EXHIBIT G

Verification

VERIFICATION OF APPLICATION

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

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



Joel Hunter
EVP, Finance & Chief Financial Officer

SUBSCRIBED AND SWORN before me, a notary public in and for the Province of Alberta, this 11th day of December 2025.



Kelly Galloway

My Commission does not expire.


KELLY ALLISON GALLOWAY
Barrister & Solicitor