

July 24, 2026

Department of Energy
Office of Utility Systems and Economic Regulatory Administration
1000 Independence Avenue, S.W.
Washington, DC 20585

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

**Re: Application of KPT Energy LLC for Authority to Transmit Electric
Energy to Canada**

Dear Whom it May Concern:

Pursuant to 10 C.F.R. § 205.300 of the regulations of the Department of Energy (“DOE”), enclosed for filing on behalf of KPT Energy LLC (“KPT Energy”) is an Application for Authority to Transmit Electric Energy to Canada (“Application”).

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

Respectfully submitted,

/s/ Kathryn Douglass
Kathryn Douglass
1601 Wewatta Street, Ste. 815
Denver, Colorado 80202
kdouglass@crowell.com
303-524-8654

Attorney for KPT Energy LLC

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

KPT Energy LLC

)

Docket No. EA-_____

**APPLICATION OF KPT ENERGY LLC FOR
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, KPT Energy LLC (“KPT Energy” or “Applicant”) hereby submits this application to request authorization to export electricity from the United States to Canada for a period of five years, or such longer period as may be permitted (“Application”).

I. COMMUNICATIONS

Communications and correspondence concerning this filing should be addressed to

Kathryn Douglass
Counsel
Crowell & Moring LLP
1601 Wewatta Street, Ste. 815
Denver, Colorado 80202
kdouglass@crowell.com
303-524-8654

Daniel Rodrigues
CEO
KPT Energy LLC
34 Minowan Miikan Ln
Toronto, Ontario M6J 0G3 Canada
dan@kptenergy.ca
519-498-8212

II. DESCRIPTION OF APPLICANT

Applicant’s legal name is KPT Energy LLC. KPT Energy is authorized to do business in the state of Delaware as a limited liability company with its principal place of business in Toronto, Canada. KPT Energy is directly and wholly owned by KPT Energy LP, an entity

organized under the laws of Canada. KPT Energy LP is wholly and directly owned by KPT Energy Holdings Inc. (“KPT Energy Holdings”), also organized under the laws of Canada. KPT Energy GP Inc., a Canadian corporation, which is wholly and directly owned by Daniel Rodrigues, owns all of the general partnership interests in KPT Energy LP and serves as its general partner. All of the limited partner interests in KPT Energy LP are wholly and directly owned by KPT Energy Holdings. KPT Energy Holdings is directly owned by DTFC Holdings Inc. (“DTFC”) (60%) and Boof & Doof Corp. (“Boof & Doof”) (40%), both organized under the laws of Canada. DTFC is wholly and directly owned by Mr. Rodrigues and Boof & Doof is wholly and directly owned by Abraham Escalante. Neither KPT Energy nor its affiliates own or operate generation or transmission facilities, nor do they have a franchised electric power service area. KPT Energy is the only entity seeking authorization to export power and it is not seeking authorization to export power on behalf of, or in conjunction with, any partners or partnerships.

KPT Energy is formed to be a power marketer engaging in the purchase and sale of physical and/or virtual energy in wholesale electricity markets. KPT Energy submitted its application for authorization to make wholesale power sales at market-based rates in the United States to the Federal Energy Regulatory Commission (“FERC”) on June 10, 2026.¹

III. JURISDICTION

KPT Energy believes that the DOE is the only state, federal, or local government with jurisdiction over this Application.

¹ KPT Energy LLC, Application for Market-Based Rate Authority, Request for Waivers, and Request for Blanket Approval Under 18 C.F.R § Part 34, Docket No. ER26-2773-000 (filed June 10, 2026).

IV. DESCRIPTION OF TRANSMISSION FACILITIES

KPT Energy requests authority to export electric power to Canada as a power marketer over any authorized existing international electric transmission facilities approved by Presidential Permit that is appropriate for open access by third parties in accordance with the export limits authorized by DOE as described in Exhibit A, and over any international transmission facilities that may be approved by DOE in the future.

V. TECHNICAL DISCUSSION OF PROPOSAL

Section 202(e) of the Federal Power Act (“FPA”) provides 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.² With this Application, KPT Energy provides information demonstrating that its request meets these standards.

DOE has explained that it interprets the first criteria to “mean that sufficient generating capacity and electric energy must first exist such that the export could be made without compromising the energy needs of the exporting region, including serving all load obligations in the region while maintaining appropriate reserve levels.”³ As to the second criteria, DOE considers the issue of “operational reliability of the domestic electric transmission system.”⁴ DOE relies on market mechanisms and reliability oversight to determine if these criteria are met.

As described in Section II, neither KPT Energy nor its affiliates own or operate any electric generation or transmission facilities on which the proposed exports could have a reliability, fuel

² 16 U.S.C. § 824a(e).

³ U.S. Dep’t of Energy, *Application for Authorization to Transmit Electric Energy to a Foreign Company*, DOE-HG-2025-0019, 91 Federal Register 36970 (June 22, 2026) (“Application Rule”).

⁴ *Id.*

use, or system stability impact. KPT Energy will act as a power marketer and has no obligation to serve native load usually associated with a franchised service area, and, thus, the exports proposed by KPT Energy will not impair any ability to meet current and prospective power supply obligations.⁵ KPT Energy will purchase power to be exported from a variety of sources such as power marketers, independent power producers, U.S. electric utilities and federal power marketing entities through voluntary agreements. By definition, such power is surplus to the needs of the selling entities and, therefore, the electric power that KPT Energy will export on either a firm or interruptible basis will not impair the sufficiency of the electric power supply in the United States or the regional coordination of electric utility planning or operations.⁶

KPT 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 KPT Energy will be transmitted pursuant to arrangements with utilities that own and operate existing transmission facilities, in compliance with existing industry and market procedures for obtaining transmission capacity, 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. KPT Energy will schedule its transactions 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 and will comply with all reliability limits on border facilities. Further, as a power marketer that does not own or operate a transmission system, KPT Energy does not have

⁵ *Id.*; see also *CWP Energy, Inc.*, Order EA-410-C, at 6 (2026) (stating that sufficiency of supply considerations are unnecessary for power marketers without franchised service areas and native load obligations).

⁶ See *Enron Power Marketing, Inc.*, Order EA-102 (1996).

the ability to 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. The controls inherent in transactions that comply with NERC requirements and export limits imposed by DOE on international transmission facilities are sufficient to ensure that exports by KPT Energy would not impede or tend to impede the coordinated use of transmission facilities.

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 and previously authorized export limits of cross-border facilities.⁷ DOE has likewise recently amended its regulations to simplify the application process.⁸ As demonstrated herein, the exports proposed by KPT 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

KPT Energy will conduct its operations pursuant to this authorization and 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 operators, including any applicable regional transmission organizations and independent system operators.

⁷ 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).

⁸ See *supra* n. 3.

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

VII. VERIFICATION AND EXHIBIT

Verification executed by KPT Energy's authorized representative is enclosed with the Application. KPT Energy also includes with this Application as Exhibit A the transmission facilities authorized by presidential permit over which KPT Energy intends to export electricity to Canada.

VIII. CONCLUSION

WHEREFORE, KPT Energy requests that DOE grant this application for blanket authorization to export power from the United States to Canada. KPT Energy respectfully requests that DOE grant this Application and issue the requested authorization within 60 days of when this Application was submitted.

Respectfully submitted,

/s/ Kathryn Douglass

Kathryn Douglass
1601 Wewatta Street, Ste. 815
Denver, Colorado 80202
kdouglass@crowell.com
303-524-8654

Attorney for KPT Energy LLC

July 24, 2026

VERIFICATION

Pursuant to 28 U.S.C. § 1746 and having authority to execute this verification and knowledge of the matters set forth herein, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.



Daniel Rodrigues
CEO, KPT Energy LLC

Executed on the 23rd day of July, 2026

EXHIBIT A– INTERNATIONAL TRANSMISSION FACILITIES

Transmission Facilities Located at the U.S.-Canadian 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	230-kV	PP-10
	Blaine, WA	500-kV	PP-10
	Nelway, WA	230-kV	PP-36
	Nelway, WA	230-kV	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	230-kV	PP-230
	Marysville, MI	230-kV	PP-230
	St. Claire, MI	230-kV	PP-230
	St. Claire, MI	345-kV	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

*As set forth in the Application, KPT Energy requests authority to export electricity over any authorized international transmission facility, including but not limited to those set forth in this Exhibit A.

[†]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.

Present Owner	Location	Voltage	Presidential Permit No.[†]
Maine Electric Power Company	Houlton, ME	345-kV	PP-43
Versant Power (f/k/a Maine Public Service Company)	Limestone, ME	69-kV	PP 497
	Fort Fairfield, ME	69-kV	PP 497
	Madawaska, ME	138-kV	PP 498
	Aroostook, ME	2-69-kV	PP 498
	Easton, ME	7.2-kV	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
New York Power Authority	Massena, NY	765-kV	PP-56
	Massena, NY Niagara Falls, NY Devils Hole, NY	2-230-kV	PP-25
		2-345-kV	PP-74
		230-kV	PP-30
Niagara Mohawk Power Corp.	Devils Hole, NY	230-kV	PP-190
Northern States Power Company	Red River, ND	230-kV	PP-45
	Roseau County, MN	500-kV	PP-63
	Rugby, ND	230-kV	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	Beattie Twp, ME	±320-kV DC	PP 438*

Present Owner	Location	Voltage	Presidential Permit No.[†]
LLC			
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.