

DEC 26 2018

UNITED STATES OF AMERICA
BEFORE THE

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Electricity Delivery and
Energy ReliabilityElectricity Delivery and
Energy Reliability

Brookfield Renewable Trading and Marketing LP

Docket No. EA-465

**APPLICATION OF
BROOKFIELD RENEWABLE TRADING AND MARKETING LP
FOR AUTHORIZATION TO TRANSMIT
ELECTRIC ENERGY TO CANADA**

Pursuant to Section 202(e) of the Federal Power Act ("FPA"), 16 U.S.C. § 824a(e), and Sections 205.300 to 205.309 of the U.S. Department of Energy's ("DOE") regulations, 10 C.F.R. §§ 205.300-309, Brookfield Renewable Trading and Marketing LP ("Applicant" or "BRTM") respectfully submits this Application to apply for blanket authority to transmit electric energy from the United States to Canada. BRTM respectfully requests that this authorization be granted for a five (5) year period to become effective on February 15, 2019, and expiring on February 14, 2024.

I. DESCRIPTION OF THE APPLICANT AND ITS PARTNERS

The exact legal name of the Applicant is Brookfield Renewable Trading and Marketing LP. Brookfield Energy Marketing Inc. ("BEMI"), an Ontario corporation and wholly-owned indirect subsidiary of Brookfield Asset Management Inc. ("BAM"), owns the 0.01 percent general partner interest in BRTM. Brookfield BRP Canada Corp., ("BBCC") an Alberta corporation, own the 99.99 percent limited partner interest in the Applicant. BBCC is a wholly-owned indirect subsidiary of Brookfield Renewable Partners LP ("Brookfield Renewable").

BAM is an Ontario corporation with its principal place of business in Toronto, Ontario, Canada and is a global alternative asset manager focused on property, renewable power, infrastructure assets, and private equity. It currently has approximately \$285 billion of assets under management. BAM is a publicly traded company listed on the Toronto Stock Exchange, New York Stock Exchange and Euronext Amsterdam under the symbols BAM.A, BAM, and BAMA, respectively.

Brookfield Renewable is a Bermuda limited partnership which is publicly traded on the Toronto Stock Exchange and the New York Stock Exchange, under the symbols BEP.UN and BEP. BAM indirectly owns 60 percent of Brookfield Renewable on a fully exchanged basis. Brookfield Renewable owns companies regulated as public utilities under the FPA, and companies owning qualifying facilities. In total, Brookfield Renewable has ownership interests in approximately 5,900 MWs of generation in the United States and Canada.

BRTM does not own generation or transmission assets and does not have a franchised electric service area. BRTM will operate as a wholesale marketer of electric energy and as electric energy agent to Brookfield Renewable.

BRTM has applied for market-based rate authorization to be issued by the Federal Energy Regulatory Commission ("FERC") under Section 205 of the FPA.¹ BRTM will purchase electric energy from Brookfield Renewable affiliates, market pools and other third-party marketing entities. Some of this electric energy will be resold by BRTM under long term power purchase agreements and some of this electric energy will be sold into regulated markets, or to market pools and other third-party purchasers.

II. COMMUNICATIONS

All service and correspondence concerning this Application should be sent to:

Ruth Teetzel
Manager, Energy Marketing
Brookfield Renewable Trading and Marketing LP
41 Victoria Street
Gatineau, Quebec J8X 2A1
Tele: (819) 561-2722 x 6524
Fax: (819) 561-7188
ruth.teetzel@brookfieldrenewable.com

III. APPLICANT'S CORPORATE ORGANIZATION

BRTM was formed on October 5, 2018 as a limited partnership organized under the laws of Ontario, Canada. BRTM has applied for authorization to do business in the states of Maine and New Hampshire, and in the Provinces of Quebec, Alberta, and British Columbia in Canada. Its principal place of business is located at 41 Victoria Street, Gatineau, Quebec, Canada.

IV. JURISDICTION

No other known U.S. federal, state or local government has jurisdiction over the actions to be taken under the authority in this Application.

V. TRANSMISSION FACILITIES

BRTM seeks authorization to export electric energy to Canada as an energy marketer over any international transmission facility authorized by Presidential permit that is appropriate for open access transmission by third parties and is in accordance with the export limits authorized by the DOE. A list of transmission facilities located at the United

¹ *Brookfield Renewable Trading and Marketing LP*, Application for Market-Based Rate Authorization, Request For Waivers, Blanket Authorizations, Confidential Treatment, and Expedited Action, FERC Docket No. ER19-529-000 (filed Dec. 11, 2018).

States border is set out in Exhibit C. In addition, BRTM agrees to abide by general conditions consistent with those set forth in existing DOE electricity export authorizations.

VI. TECHNICAL DISCUSSION

BRTM submits that this Application is consistent with United States energy policy. BRTM is in the process of obtaining authority from the National Energy Board of Canada to export electric energy from Canada to the United States across all border facilities.² Thus, approval of this Application would foster a more efficient and competitive North American energy market.

BRTM respectfully submits that its request for export authorization meets the two criterion of Section 202(e) of the FPA, 16 U.S.C. § 824a(e):

1. The first criterion provides that the DOE shall grant a request for export authorization unless, after opportunity for hearing, it finds that the proposed transmission would impair the sufficiency of electric supply within the United States. As an energy marketer, BRTM does not have a franchised service area and, consequently, has no native load obligations. BRTM will purchase the electric energy that it exports from electric utilities, qualifying cogeneration facilities, qualifying small power production facilities, Independent System Operators (“ISOs”) and/or Regional Transmission Operators (“RTOs”) (as those terms are defined in Section 3 of the FPA, 16 U.S.C. § 796), and/or from exempt wholesale generators (as that term is defined in Section 32(a) of the Public Utility Holding Company Act, 15 U.S.C. §79z-5a). The electric energy that will be sold to BRTM is surplus to the needs of the selling entities. Accordingly, the proposed export will not impair the sufficiency of the electric energy supply within the United States.
2. The second criterion provides that the DOE shall approve a request for export authorization unless, after opportunity for hearing, it finds that the proposed transmission would impede or tend to impede the coordination in the public interest of facilities subject to the jurisdiction of the DOE. In making necessary arrangements to transmit the exported power, BRTM will comply with existing industry procedures for obtaining transmission capacity, including making reservations on the FERC Open-Access Same-Time Information System (OASIS), scheduling delivery of the export with the appropriate RTOs, ISOs, control area operator(s) and/or non-jurisdictional transmission owners. Accordingly, transmission used to effectuate Applicant’s exports will be available on OASIS and transmission owners will, consistent with their existing obligations, be responsible for ensuring that its delivery is consistent with applicable reliability standards and transmission limits. This will ensure that the proposed exports will not: (a) cause the operating parameters of any regional transmission systems to fall outside established industry criteria, (b) exceed the maximum rate of transmission specified in export authorizations for jurisdictional border systems (as set forth on Exhibit

² Joint Application of Brookfield Energy Marketing LP and Brookfield Renewable Trading and Marketing LP for transfer of National Energy Board Electricity Export Permit EPE-420 dated Dec. 12, 2018, Filing A96623.

C and updated by the DOE from time to time), or (c) exceed the transmission capability limits set by the DOE for exports through non-jurisdictional border systems (as set forth on Exhibit C and updated by the DOE from time to time). Accordingly, the proposed transmission would not impede or tend to impede the coordination in the public interest of facilities subject to the jurisdiction of the DOE.

VII. EXHIBITS AND ATTACHMENTS

The following Exhibits are attached hereto:

Exhibit A - Agreements under which the electricity is to be transmitted. **NONE**

Exhibit B - Legal opinion of BRTM's counsel

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

Exhibit D - Non-U.S. Applicant's power of attorney

Exhibit E - Statement of any corporate relationship or existing contract which in any way relates to the control or fixing of electric power rates for the purchase, sale or transmission of electric energy. **NOT APPLICABLE**

Exhibit F - Operating procedures regarding available capacity and energy. **NOT APPLICABLE**

VI. CONCLUSION

BRTM respectfully requests that this Application for blanket authority to transmit electric energy to Canada be expeditiously considered and approved. Further, BRTM respectfully requests that such authorization be granted for five (5) years commencing on February 15, 2019 and expiring on February 14, 2024.

Respectfully submitted,

Brookfield Renewable Trading and Marketing LP

By: 

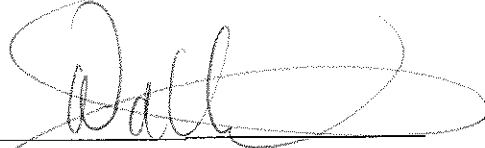
Name: Walter Di Cesare

Title: Vice President and Secretary

December 13, 2018

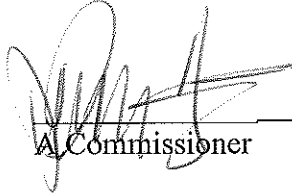
VERIFICATION

I, Walter Di Cesare, having knowledge of the matters set forth in the above Application, hereby verify that the contents thereof are true and correct to the best of my knowledge, information, and belief.



Walter Di Cesare

Subscribed and sworn before me, a Commissioner, this 13th day of December, 2018.



A Commissioner

RUTHANNE TEETZEL
Commissaire à l'assermentation
No. 213709
Pour le Québec, avec juridiction
en Ontario

My Commission expires: February 3, 2019

Exhibit A
AGREEMENTS

NONE AT THIS TIME

Exhibit B
LEGAL OPINION AND STATEMENT OF COUNSEL

SEE ATTACHED

Brookfield

Brookfield Renewable
41 Victoria Street
Gatineau, Québec J8X 2A1

Tel 819.561.2722
Fax 819.561.7188
www.brookfieldrenewable.com

December [14], 2018

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

Re: Brookfield Renewable Trading and Marketing LP
Authorization to Export Electricity (Docket no. EA-_____ - _____)

Ladies and Gentlemen:

I am Vice President & Secretary of Brookfield Renewable Trading and Marketing LP ("BRTM"), a limited partnership formed under the laws of the Province of Ontario, Canada. This opinion is submitted pursuant to 10 C.F.R. § 205.303(b) of the regulations of the Department of Energy (the "DOE") in support of BRTM's application (the "Application") for blanket authorization from the DOE to export electricity from the United States to Canada (Docket No. EA-_____ - _____).

In connection with this opinion, I have reviewed BRTM's corporate documents and have made such examination of law as I have deemed necessary or appropriate.

Based upon such review, I am of the opinion that the proposed export of electricity from the United States to Canada is within BRTM's corporate powers. BRTM has complied or will comply with all pertinent Federal and State laws.

For the purpose of expressing this opinion, I have relied, as to matters of fact, upon representations and certificates of directors, officers and employees of BRTM, and certificates of, and communications from, government authorities and public officials, and I have assumed the genuineness of all signatures, the legal capacity of all natural persons, the authenticity of all documents submitted as originals and the conformity with the original documents of all documents submitted as certified or photostatic copies or by facsimile or other means of electronic transmission.

I am admitted to the Law Society of Upper Canada and I express no opinion under the laws of any jurisdiction other than Ontario and the Federal laws of Canada applicable therein.

Respectfully submitted,



Walter Di Cesare
Vice President & Secretary

Exhibit C
UNITED STATES INTERCONNECTIONS WITH CANADA

Presidential Permit	Owner	Location	Voltage
PP-64	Basin Electric Power Cooperative	Tioga, ND	230-kV
PP-89	Bangor Hydro-Electric Company	Baileyville, ME	345-kV
PP-10	Bonneville Power Administration	Blaine, WA	2 500-kV
PP-36	Bonneville Power Administration	Nelway, WA	230-kV
PP-46	Bonneville Power Administration	Nelway, WA	230-kV
PP-62	Central Maine Power Company	Coburn Gore, ME	120-kV 240-kV
PP-66	Citizen Derby	Derby Line, VT	120-kV
PP-221	Detroit Edison Company	Marysville, MI	230-kV
PP-221	Detroit Edison Company	Detroit, MI	230-kV
PP-221	Detroit Edison Company	East China Township, MI	345-kV
PP-221	Detroit Edison Company	East China Township, MI	345-kV
PP-228	Edison Sault Electric Company	Sault Ste Marie, MI	230-kV
PP-32	Eastern Maine Electric Cooperative	Calais, ME	69-kV
PP-230	International Transmission Company	Detroit, MI	230-kV
PP-230	International Transmission Company	Marysville, MI	230-kV
PP-230	International Transmission Company	St. Claire, MI	230-kV
PP230	International Transmission Company	St. Claire, MI	345-kV
PP-82	Joint Owners of the Highgate Project	Highgate, VT	120-kV
PP-24	Long Sault, Inc.	Massena, NY	2 – 115-kV
PP-43	Maine Electric Power Company	Houlton, ME	345-kV
PP-12	Maine Public Service Company	Limestone, ME	69-kV
PP-12	Maine Public Service Company	Fort Fairfield, ME	69-kV
PP-29	Maine Public Service Company	Madawaska, ME	138-kV

Presidential Permit	Owner	Location	Voltage
PP-29	Maine Public Service Company	Aroostook, ME	2 – 69-kV
PP-78	Minnesota Power, Inc.	International Falls, MN	115-kV
PP-61	Minnkota Power Cooperative	Roseau, County, MN	230-kV
PP-305	Montana Alberta Tie Ltd.	Great Falls, MO	230-kV
PP-56	New York Power Authority	Massena, NY	765-kV
PP-25	New York Power Authority	Massena, NY	2 – 230-kV
PP-74	New York Power Authority	Niagara Falls, NY	2 – 345-kV
PP-30	New York Power Authority	Devils Hole, NY	230-kV
PP-190	Niagara Mohawk Power Corp.	Devils Hole, NY	230-kV
PP-45	Northern States Power Company	Red River, ND	230-kV
PP-63	Northern States Power Company	Roseau County, MN	500-kV
PP-231	Northern States Power Company	Rugby, ND	230-kV
PP-299	Sea Breeze Olympic Converter LP	Port Angeles, WA	450-kV DC
PP-69	Vermont Electric Cooperative, Inc.	Derby Line, VT	24-kV
PP-69	Vermont Electric Cooperative, Inc.	Derby Line, VT	2 - 14-kV
PP-66	Vermont Electric Power Co.	Derby Line, VT	120-kV
PP-76	Vermont Electric Transmission Co.	Norton, VT	450-kV DC
PP-76	Vermont Electric Transmission Co.	Millbury, MA	345-kV
PP-76	Vermont Electric Transmission Co.	Medway, MA	345-kV

Exhibit D
IRREVOCABLE LIMITED POWER OF ATTORNEY

SEE ATTACHED

IRREVOCABLE LIMITED POWER OF ATTORNEY

This IRREVOCABLE LIMITED POWER OF ATTORNEY is made December 13, 2018, by Brookfield Renewable Trading and Marketing LP (the "Principal"), a limited partnership formed under the laws of Ontario, with its principal place of business at 41 Victoria Street, Gatineau, Quebec J8X 2A1.

1. Appointment. The Principal does hereby appoint Jacob A. Pollack, General Counsel – US, whose principal place of business is at Brookfield Renewable Power Group, 200 Liberty Street, 14th Floor, New York, NY, as the Principal's true and lawful agent and attorney-in-fact ("Attorney-in-Fact") for the limited purpose hereinafter set out.

2. Scope of Authority. The Attorney-in-Fact shall have the limited power and authority to receive service of process for any and all matters relating to the Principal's reporting requirements to the U.S. Department of Energy pursuant to the Principal's Authority to Transmit Electric Energy to Canada.

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

IN WITNESS WHEREOF, the Principal has caused this Power of Attorney to be duly executed on this 13th day of December, 2018.

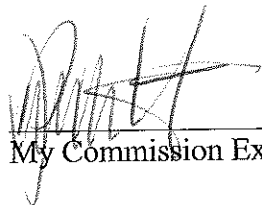
Brookfield Renewable Trading and Marketing LP

By: _____

Name: Walter Di Cesare

Title: Vice President and Secretary

SUBSCRIBED AND SWORN before me, a Commissioner for taking Oaths in the Province of Quebec this 13th day of December, 2018.



My Commission Expires: February 3, 2019

RUTHANNE TEETZEL

Commissaire à l'assermentation

No. 213709

Pour le Québec, avec juridiction
en Ontario

Exhibit E
STATEMENT OF ANY CORPORATE RELATIONSHIP OR EXISTING
CONTRACT WHICH IN ANY WAY RELATES TO THE CONTROL OR
FIXING OF ELECTRIC POWER RATES

NOT APPLICABLE

Exhibit F
OPERATING PROCEDURES REGARDING AVAILABLE
CAPACITY AND ENERGY

NOT APPLICABLE