

NOV 7 2018

UNITED STATES OF AMERICA
BEFORE THE
THE UNITED STATES DEPARTMENT OF ENERGY
Electricity Delivery and
Energy Reliability

Brookfield Energy Marketing Inc.) Docket No. EA-258- E

APPLICATION OF
BROOKFIELD ENERGY MARKETING INC.
FOR RENEWED AUTHORIZATION TO TRANSMIT
ELECTRIC ENERGY TO CANADA

Pursuant to Section 202(e) of the Federal Power Act ("FPA"), 1 and 10 C.F.R. Section 205.300 to 205.309 of the U.S. Department of Energy's ("DOE") regulations, Brookfield Energy Marketing Inc. ("Applicant" or "BEMI") respectfully submits this Application to renew its blanket authority to transmit electric energy from the United States to Canada. On April 23, 2014, BEMI received authorization to export electric energy to Canada in Docket No. EA-258-D. BEMI respectfully requests that its renewal authorization become effective as April 23, 2019 and that this authorization be issued for a period of five (5) years, ending on April 23, 2024.

I. DESCRIPTION OF THE APPLICANT

The exact legal name of the Applicant is Brookfield Energy Marketing Inc. BEMI is a power marketer incorporated under the laws of Ontario, Canada. Its principal place of business is located in Gatineau, Quebec, Canada. BEMI does not own generation or transmission assets and does not have a franchised electric power service area. BEMI operates as a wholesale and retail marketer of electric power and arranges services in related areas such as fuel supplies and transmission services.

BEMI is an indirect wholly owned subsidiary of Brookfield Asset Management Inc. ("BAM"). BAM is an Ontario corporation with its principal place of business in Toronto, Ontario, Canada. BAM 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.

BAM indirectly owns companies regulated as public utilities under the FPA, and companies owning qualifying facilities. In total, BAM has ownership interests in approximately 5,900 MWs of generation in the United States and Canada.

BEMI purchases power from BAM affiliates, market pools and other third-party marketing entities. Some of this power is resold by BEMI under long term power purchase agreements and some of this power is sold into regulated markets, or to market pools and other third-party purchasers.

BEMI holds market-based rate authorization issued by the Federal Energy Regulatory Commission ("FERC") under Section 205 of the FPA¹.

II. JURISDICTION

No other U.S. federal, state or local government has jurisdiction over the actions to be taken under the authority in this Application. The power export(s) contemplated by the Application are foreign as opposed to interstate commerce, and are therefore outside of FERC's jurisdiction.

III. COMMUNICATIONS

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

Ruth Teetzel
Senior Contract and Regulatory Analyst
Brookfield Energy Marketing Inc.
41 Victoria Street
Gatineau, Quebec J8X 2A1
Tele: (819) 561-2722 x 6524
Fax: (819) 561-7188
ruth.teetzel@brookfieldrenewable.com

IV. DISCUSSION OF PROPOSAL

BEMI seeks renewed authorization to export electric power to Canada as a power marketer. BEMI requests authority to export electric energy over any international transmission facility authorized by Presidential permit that is appropriate for open access transmission by third parties in accordance with the export limits authorized by the DOE. A list of transmission facilities located at the United States border is set out in Exhibit C. In addition, BEMI agrees to abide by general conditions consistent with those set forth in existing DOE electricity export authorizations.

BEMI submits that this Application is consistent with the North America Free Trade Agreement (1993) and United States energy policy. BEMI has authority from the National Energy Board of Canada to export power from Canada to the United States across all border facilities². Thus, approval of this Application would foster a more efficient and competitive North American energy market.

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

¹ *Maclaren Energy Inc.*, FERC Docket Nos. ER01-2104-000 and ER01-2104-001 (unpublished letter order issued Aug. 27, 2001 and unpublished letter issued Oct. 16, 2001) (re-named Brookfield Energy Marketing Inc. with notice to FERC).

² National Energy Board Permit EPE-420 issued July 6, 2017 and ending July 5, 2027.

1. The first criterion provides that the DOE shall approve 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 a power marketer, BEMI does not have franchised service areas and, consequently, has no native load obligations. BEMI purchases the power to be exported from electric utilities, qualifying cogeneration and small power production facilities (as those terms are defined in Section 3 of the FPA, 16 U.S.C. § 796), and 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) or Independent Market Operators (ISOs). The power sold to BEMI is surplus to the needs of the selling entities. Accordingly, the proposed export would not impair the sufficiency of the electric power 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, BEMI 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 Regional Transmission Organization(s), Independent System Operator(s), control area operator(s) and/or non-jurisdictional transmission owners. Accordingly, transmission will need to be available on OASIS and transmission owners will be responsible for ensuring that its delivery is consistent with applicable reliability standards and transmission limits. This will ensure that the proposed export 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 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.

V. 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 BEMI'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

BEMI respectfully requests that this Application to renew its blanket authority to transmit electric energy to Canada be expeditiously considered and approved. Further, BEMI respectfully requests that such renewed authorization be granted for five (5) years to expire on April 23, 2024.

Respectfully submitted,

Brookfield Energy Marketing Inc.

By: 
Name: Walter Di Cesare
Title: Vice President and Secretary

October 29, 2018

Exhibit A
AGREEMENTS

NONE AT THIS TIME

Exhibit B
LEGAL OPINION AND STATEMENT OF COUNSEL

SEE ATTACHED

October 29, 2018

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

Re: Brookfield Energy Marketing Inc.
Authorization to Export Electricity (Docket no. EA-258-)

Ladies and Gentlemen:

I am Vice President & Secretary to Brookfield Energy Marketing Inc. ("BEMI"), a corporation incorporated under the laws of the Province of Ontario, Canada. This opinion is submitted pursuant to 10. C.F.R. 205.303(b) of the Department of Energy (the "DOE") administrative procedures in support of BEMI's application (the "Application") for renewal authorization from the DOE to export electricity from the United States to Canada (Docket No. EA-258-).


In connection with this opinion, I have reviewed BEMI'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 BEMI's corporate powers.

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 BEMI, 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 DiCesare
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
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

Presidential Permit	Owner	Location	Voltage
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 October 29, 2018, by Brookfield Energy Marketing Inc. (the "Principal"), a corporation incorporated 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 F. Mitchell Davidson 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 29th day of October, 2018.

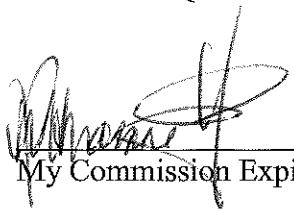
Brookfield Energy Marketing Inc.

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 6th day of November, 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