

FEB 15 2019

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

Dynasty Power, Inc.

Docket No. EA-385- AAPPLICATION OF DYNASTY POWER, INC.  
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 10 C.F.R. §§ 205.300 *et seq.*, Dynasty Power, Inc. ("Dynasty Power") hereby files with the Department of Energy ("DOE" or the "Department") an original and two (2) copies of the instant application ("Application") for blanket authority to transmit electric energy from the United States to Canada. On September 26, 2012, the Office of Electricity Delivery and Energy Reliability issued Order No. EA-385, authorizing Dynasty Power to export electric energy to Canada as a power marketer for a term of five years. Dynasty Power respectfully requests renewal of its authorization to transmit electricity from the United States to Canada for a term of five years.

**I. DESCRIPTION OF THE APPLICANT**

Dynasty Power is incorporated in the Canadian province of Alberta, with its principal place of business in Calgary, Alberta. Dynasty's sole business is to act as a power marketer in the purchase and sale of wholesale electricity, capacity, and ancillary services at market-based rates in Eastern bilateral markets, as well as in the following Independent System Operators and/or Regional Transmission Organizations: PJM Interconnection, LLC; New York Independent System Operator, Inc.; the Midcontinent Independent System Operator, Inc.; ISO New England Inc.; Southwest Power Pool, Inc.; Electric Reliability Council of Texas, Inc.; and

the California Independent System Operator. Dynasty Power has been granted authority by the Federal Energy Regulatory Commission (“FERC”) to sell electricity at wholesale market-based rates.<sup>1</sup>

Dynasty Power is owned by three holding companies, three individuals, and one trust. With respect to the three holding companies, 1713845 AB LTD owns 48.91%; 1691399 AB LTD owns 21.68%; and Quacho Holdings LTD owns 19.31%. In terms of the individual owners, Christopher Quilley owns 5.05%, Kelly Elias owns 2.53%, and Andrew Hoang owns 1.26%. The Todd McRae Living Trust owns 1.26%. None of the owners has any interest in any electric generation, transmission, or distribution facilities, nor do they hold any interest in other companies that participate in, or provide services to, the power industry. Dynasty Power does not own or control any electric power generation or transmission facilities and does not have a franchised electric power service area. Dynasty Power only operates as a power marketing company.

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<sup>1</sup> FERC has granted Dynasty Power authority to sell energy, capacity, and ancillary services at market-based rates. See *Dynasty Power, Inc.*, Docket No. ER11-3342-000, Letter Order issued May 11, 2011.

## II. COMMUNICATIONS

Communications regarding this Application should be addressed to the following

persons:

*Dynasty Power*

Todd McRae  
Risk Manager  
Dynasty Power Inc.  
200, 638 6th Ave SW  
Calgary, AB T2P 0S4, CAN  
[tmcrae@dynastypower.ca](mailto:tmcrae@dynastypower.ca)

*Suchman Law LLC*

Bonnie A. Suchman, Esq.  
Suchman Law LLC  
8104 Paisley Place  
Potomac, Maryland 20854  
[bonnie@suchmanlawllc.com](mailto:bonnie@suchmanlawllc.com)

## III. JURISDICTION

Under Section 202(e) of the FPA, 16 U.S.C. § 824a(e), and DOE's regulations, 10 C.F.R. § 205.300 *et seq.*, any person seeking to transmit electric energy from the United States to a foreign country must first secure an order from DOE authorizing the export. No other known federal, state or local government has jurisdiction over the actions to be taken under the authority set out in this application.

## IV. TECHNICAL DISCUSSION OF PROPOSAL

Dynasty Power seeks authority to transmit electric energy to Canada. Dynasty Power intends to export power over existing transmission interconnections between the United States and Canada. Exhibit C to this Application provides the location and description of the transmission facilities through which the electric energy may be delivered into Canada, and includes the name of the facility owners as well as the Presidential Permit numbers.

Dynasty Power will purchase surplus electric energy from electric utilities and other suppliers within the United States and will export this energy to Canada over the international electric transmission facilities. The present owners of the transmission facilities are listed in

Exhibit C. Because this electric energy will be purchased from others voluntarily, it will be surplus to the needs of the selling entities. Dynasty Power's export of power will not impair the sufficiency of electric power supply in the U.S.

Dynasty Power will make all necessary commercial arrangements and will obtain any and all other regulatory approvals required in order to effect any power exports. This will include: (1) scheduling each transaction with the appropriate control area in compliance with all reliability criteria, standards, and guidelines of the North American Electric Reliability Corporation ("NERC") and applicable Regional Entities in effect at the time of export; (2) obtaining all necessary transmission access over the existing facilities listed in Exhibit C; and (3) providing evidence of the agreements with transmission owners to DOE.

Consistent with past DOE precedent, Dynasty Power requests that DOE use the reliability analyses performed in the most recent export authorization proceedings that rely upon the border transmission facilities referenced in Exhibit C. Dynasty Power agrees to abide by the export limits of these transmission facilities. The controls that are inherent in any transaction that complies with all NERC requirements and the export limits imposed by DOE on the referenced transmission facilities are sufficient to ensure that exports by Dynasty Power will not impede or tend to impede the coordinated use of transmission facilities within the meaning of Section 202(e) of the FPA.

## **V. PROCEDURES**

Dynasty Power is willing to accept all conditions imposed by the Department of Energy on its authorization to export power. In particular, if required by DOE, exports made by Dynasty Power will not exceed the export limits for the transmission facilities utilized by Dynasty Power, or otherwise cause a violation of the terms and conditions set forth in the export authorization.

When scheduling the delivery of power, Dynasty Power will comply with the applicable NERC reliability criteria, standards, and guidelines. Dynasty Power will provide DOE with all required reports indicating the gross amount of electricity delivered to Canada, consideration received during each month, and the maximum hourly rate of transmission, as well as any additional annual reports required.

## **VI. SERVICE AND FEE**

In accordance with the requirements of 10 C.F.R. § 205.309, copies of this application will be provided to the following:

Ms. Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.W.  
Washington, D.C. 20426

A check in the amount of \$500.00 made payable to the U.S. Department of Treasury is enclosed in payment of the fee specified in 10 C.F.R. § 205.309.

## **VII. VERIFICATION**

Verification executed by Applicant's authorized representative, Todd McRae, Risk Manager, in accordance with 10 C.F.R. § 205.302(h) is enclosed with this Application.

## **VIII. EXHIBITS**

In accordance with the requirements of 10 C.F.R. § 205.303, the following exhibits are attached hereto:

- Exhibit A      Transmission Agreements
- Exhibit B      Opinion of Counsel
- Exhibit C      International Transmission Facilities (Submitted in lieu of Maps)
- Exhibit D      Power of Attorney

Exhibit E Statement of Any Corporate Relationship or Existing Contract

Exhibit F Operating Procedures

**IX. CONCLUSION.**

WHEREFORE, Dynasty Power respectfully requests that this Application for Authorization to Transmit Electric Energy to Canada be considered and approved.

Respectfully Submitted,



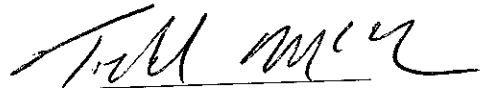
Bonnie A. Suchman, Esq.  
Suchman Law LLC  
8104 Paisley Place  
Potomac, Maryland 20854  
[bonnie@suchmanlawllc.com](mailto:bonnie@suchmanlawllc.com)

*Attorney for  
Dynasty Power, Inc.*

Dated: February 15, 2019

**VERIFICATION**

I, Todd McRae, Risk Manager, of Dynasty Power, Inc., having knowledge of the matters set forth in the above Application for Authorization to Transmit Energy to Canada, hereby verify that the contents thereof are true and correct to the best of my knowledge and belief.



NAME

SUBSCRIBED AND SWORN before me, a notary public this 7 day of February, 2019.

  
Notary Public

My Commission expires at death

PETER R.S. LEVEQUE  
Barrister & Solicitor  
Notary Public/Commissioner for Oaths  
in and for Alberta

**EXHIBIT A -- TRANSMISSION AGREEMENTS**

*Currently, Dynasty Power has no transmission reservations or transmission agreements within the United States.*



## EXHIBIT B

### Statement of Opinion of Counsel

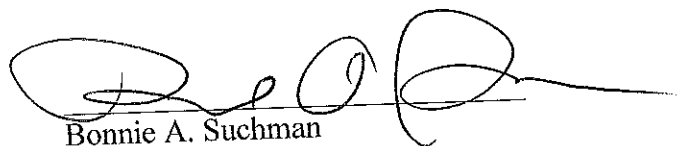
This opinion is rendered in connection with the Application of Dynasty Power, Inc. ("Dynasty Power") for Authorization to Transmit Electric Energy to Canada, dated February 15, 2019, and pursuant to 10 C.F.R. Section 205.303(b).

Based on my understanding and review of Dynasty Power, my knowledge of the corporate powers of Dynasty Power, and my examination of such documents, records and matters of laws as I have considered to be relevant, it is my opinion that:

1. The proposed exports of electrical power described in the Application are within the corporate powers of Dynasty Power; and
2. Dynasty Power has complied and will comply with all pertinent Federal and State laws.

I am opining herein only as to federal laws of the United States and laws of relevant States within the United States, and I express no opinion as to the laws of any other jurisdiction. I am not assuming any obligation to review or update this opinion should the law or existing facts or circumstances change. This opinion is provided by me as counsel for Dynasty Power solely to you for your exclusive use and is not to be made available to or relied upon by any other person or entity without my prior written consent.

Respectfully Submitted,



Bonnie A. Suchman

Dated: February 15, 2019

**EXHIBIT C**

**International Transmission Facilities  
At the U.S.-Canada Border  
Authorized for Use by Third-Party Transmitters**

<u>Present Owner</u>	<u>Location</u>	<u>Voltage</u>	<u>Presidential Permit No</u>
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 230kV 230-kV	PP-10 PP-36 PP-46
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
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
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	115-kV	PP-78
Minnkota Power Cooperative	Roseau County, MN	230-kV	PP-61
Montana Alberta Tie Ltd.	Cut Bank, MT	230-kV	PP-305
New York Power Authority	Massena, NY Massena, NY Niagara Falls, NY Devil's Hole, NY	765-kV 2-230-kV 2-345-kV 230-kV	PP-56 PP-25 PP-74 PP-30
Niagara Mohawk Power Corp.	Devil's 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
Vermont Electric Power Co.	Derby Line, VT	120-kV	PP-66

Vermont Electric Transmission Co.	Norton, VT Imperial Valley, CA	±450-kV DC 230-kV	PP-76 PP-79
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**EXHIBIT D – POWER OF ATTORNEY  
WITH AGENT RESIDING WITHIN THE UNITED STATES**

## IRREVOCABLE LIMITED POWER OF ATTORNEY

This IRREVOCABLE POWER OF ATTORNEY is made this 7 of Feb., 2019, by Dynasty Power, Inc., a company incorporated under the laws of the Alberta, with its executive offices in Calgary, Alberta, Canada.

1. Appointment. The Principal does hereby appoint Bonnie Suchman, whose principal place of business is Suchman Law LLC, 8104 Paisley Place, Potomac, Maryland 20854, 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 Principal's reporting requirements to the Department of Energy pursuant to Principal's authority to transmit electric energy to Canada.
3. Irrevocability. This Power of Attorney is irrevocable by the Principal for the five year term of the authorization to export electric energy to Canada.

IN WITNESS WHEREOF, the Principal has caused this Power of Attorney to be duly executed this 7 day of Feb., 2019.

Dynasty Power, Inc.

By: Todd McRae

Name: Todd McRae

Title: Risk Manager

SUBSCRIBED AND SWORN before me, a notary public this 7 day of February, 2018.

[Signature]  
Notary Public

My Commission Expires: on death.

PETER R.S. LEVEQUE  
Barrister & Solicitor  
Notary Public/Commissioner for Oaths  
in and for Alberta

**EXHIBIT E**  
**Statement of Any Corporate Relationship or Existing Contract**

*Not Applicable.*

**EXHIBIT F -- OPERATING PROCEDURES**

*Not Applicable*