

Centre Lane Trading Limited
199 Bay Street, Suite 4500
Toronto, Ontario M5L 1G2
Canada
Tel. (416) 860-7626

March 5, 2020

US Department of Energy

Chris Lawrence, OE-20
Office of Electricity
U.S. Department of Energy
Internal Mail Drop OE-20
1000 Independence Ave., SW
Washington, DC 20585

MAR 11 2020

Electricity Delivery and
Energy Reliability

Re: Renewal Application for Authority to Export Electric Energy to Canada

Dear Mr. Lawrence

Enclosed please find original and 2 copies of the Renewal Application of Centre Lane Trading Limited for Authorization to Transmit Electric Energy to Canada and a cheque for \$500 made out to the Treasurer of the United States. Kindly stamp one of the renewal applications and return Centre Lane with enclosed stamped envelope.

Please do not hesitate to contact me at (416) 860-7626 if you have any questions or concerns regarding this application.

Best Regards,



Jason Brandt, CEO
Centre Lane Trading Ltd.

UNITED STATES OF AMERICA
BEFORE THE
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL ENERGY

MAR 11 2020

Electricity Delivery and
Energy Reliability

Centre Lane Trading Ltd.

Docket No. EA-365-B

APPLICATION OF CENTRE LANE TRADING LTD.
FOR AUTHORIZATION TO TRANSMIT
ELECTRIC ENERGY TO CANADA

Centre Lane Trading Limited ("CLT"), 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*, hereby requests a renewal its existing export authorization to transmit electric energy from the United States to Canada, which was originally granted (Docket No. EA-365) in June 2010, and renewed (Docket No. EA-365-A) in April 2015, for a period of five (5) years (or for such other period as the Department of Energy ("Department") deems appropriate) effective from the date of the order granting this Application.

1. DESCRIPTION OF APPLICANT

The exact legal name of the applicant is Centre Lane Trading Limited ("CLT"). CLT is a private company organized under the *Business Corporations Act* (Ontario, Canada) with its principal place of business in Toronto, Ontario Canada. CLT is wholly owned by Mackie Research Financial Corporation.

CLT is a power marketer that is active in the electricity and related financial markets administered by Regional Transmission Organizations and Independent System Operators including the ISO-New England, the Midwest ISO, the New York ISO, PJM and the Independent Electricity System Operator in Ontario Canada.

The Federal Energy Regulatory Commission ("FERC") has authorized CLT to engage in wholesale sales of electrical power at market-based rates under Docket No. ER10-636-000 and CLT uses this authority to schedule physical electrical power transfers between various ISOs and their control areas.

CLT does not own operate or control any generation or transmission facilities in any region nor is it affiliated with any entity that owns, operates or controls generation or transmission facilities and is not affiliated with any franchised public utility.

2. COMMUNICATIONS

Jason Brandt
CEO
Centre Lane Trading Limited
199 Bay Street, Suite 4500
Toronto, Ontario M5L 1G2
Canada
Tel. (416) 860-7626

3. PROVINCE OF INCORPORATION

Applicant is incorporated under the *Business Corporations Act* (Ontario) and has its principal place of business in Toronto, Ontario, Canada. Applicant is not currently registered to do business in any U.S. States.

4. JURISDICTION

Pursuant to section 202(e) of the FPA, the DOE has jurisdiction over the action to be taken in this Application. No other known federal, state, or local government has jurisdiction over the action to be taken in this Application.

5. DESCRIPTION OF TRANSMISSION FACILITIES

Applicant seeks authority to transmit electricity to Canada as a power marketer over existing cross-border facilities that the DOE has deemed to be appropriate for third party transportation. Exhibit C of this Application provides a description of these transmission facilities and their Presidential Permit numbers.

6. TECHNICAL DISCUSSION

As noted above, Applicant does not own or control electric generation or transmission facilities in any market in interstate commerce in the United States or have a power supply system of its own in the United States on which its exports of power could have a reliability, fuel use, or system stability impact. Applicant will purchase the power to be exported from electric utilities and federal power marketing agencies pursuant to voluntary agreements. By definition, such power is surplus to the system of the generator and thus the electric power that Applicant will export on either a firm or interruptible basis will not impair the sufficiency of the electric power supply within the United States. Moreover, Applicant's exports of electric energy to Canada will not impede or tend to impede the regional coordination of electric utility planning or operations.

Applicant will make all necessary commercial arrangements and will obtain any and all other regulatory approvals required in order to affect any power exports. All of the electricity exported by Applicant will be transmitted pursuant to arrangements with utilities that own or operate existing transmission facilities 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 those facilities. Applicant will comply with the terms and conditions contained in the authorizations issued for these cross-border facilities as well as any other export limitations that the DOE may deem appropriate, consistent with DOE orders authorizing exports of electric energy by power marketers.

Applicant will schedule each transaction with the appropriate balancing authority in compliance with the reliability criteria, standards, and guidelines of the North American Electric Reliability Corporation (NERC) and its Regional Entities. Applicant will obtain all necessary transmission access over the existing facilities listed in Exhibit C for its exports and will comply with all applicable statutes and implementing rules, regulations, and orders of the DOE and the FERC. The controls inherent in any transaction that complies with NERC requirements and DOE export limits on the transmission facilities listed in Exhibit C are sufficient to ensure that exports by Applicant will not impede the coordinated use of transmission facilities within the meaning of section 202(e) of the FPA.

As noted in Order No. EA-102, the DOE may utilize the reliability analyses performed in other export authorization proceedings for the transmission facilities listed in Exhibit C in order to make the findings required for a grant of export authority to Applicant. Because the proposed exports will take place over existing international transmission lines, Applicant submits that the requested authorization does not require the preparation of an environmental impact statement or an environmental assessment pursuant to the National Environmental Policy Act of 1969.

7. PROCEDURES

This application is consistent with United States energy policy established in the Energy Policy Act of 1992, the North American Free Trade Agreement of 1993 and FERC Order 888, which foster more efficient and competitive North American energy markets. Applicant requests authority for export transactions through specified border facilities even though specific transactions may not yet have been negotiated.

8. EXHIBITS AND ATTACHMENTS

The signed verification of Jason Brandt is attached to this Application. In accordance with 10 C.F.R. § 205.303, the following exhibits are attached hereto and made part hereof:

Exhibit A	Not Applicable
Exhibit B	Legal Opinion
Exhibit C	Transmission Facilities (submitted in lieu of Maps)
Exhibit D	Power of Attorney with Christopher Brown of CT Corporation System residing within the United States
Exhibit E	Not Applicable

Exhibit F Not Applicable

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

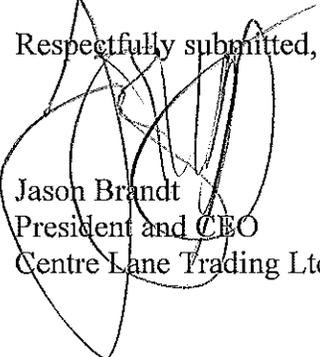
Federal Energy Regulatory Commission
Office of the Secretary
888 First St., N.E.
Washington, D.C. 20426

9. CONCLUSION

In consideration of the foregoing, Applicant requests approval of this Application for authorization to export electricity to Canada for a term of five years, effective from the date of the order granting this Application.

Applicant respectfully requests that the Department act expeditiously on this application and issue and order granting the requested Authorization as of June 9, 2015 or as early as the Department may deem fit.

Respectfully submitted,



Jason Brandt
President and CEO
Centre Lane Trading Ltd.

EXHIBIT A

Not Applicable

EXHIBIT B
Legal Opinion



Fogler, Rubinoff LLP
Lawyers

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Suite 3000, PO Box 95
TD Centre North Tower
Toronto, ON M5K 1G8
t: 416.864.9700 | f: 416.941.8852
foglers.com

March 5, 2020

U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Dear Sirs/Mesdames:

Re: Centre Lane Trading Limited

We are legal counsel to Centre Lane Trading Limited (the "**Corporation**") and understand that the Corporation is making an application to the U.S. Department of Energy dated on or about the date hereof to export electricity to Canada (the "**Application**"). This opinion is being delivered to you in support of the Application.

As a basis for the opinions hereinafter expressed, we have considered such questions of law, made such investigations and examined such statutes, public and corporate records of the Corporation and documents as we have considered necessary and relevant, including certificates of appropriate public officials and of officers or directors of the Corporation as to various questions of fact material to such opinion and not independently established. In all such examinations, we have assumed the legal capacity of all individuals, the genuineness of all signatures and the authenticity of all documents submitted to us as originals, the conformity to authentic originals of documents submitted to us as certified or true copies or reproductions thereof and the authenticity of the originals of such certified or true copies or reproductions.

We are lawyers qualified to practice law in the Province of Ontario, Canada only. Our opinions expressed below are limited to the laws of the Province of Ontario and the federal laws of Canada applicable therein, all as in effect on the date hereof.

Based upon and subject to the foregoing, we are of the opinion that:

1. we are a law firm of barristers and solicitors authorized to practice law in the Province of Ontario, Canada;
2. the Corporation is a corporation incorporated under the laws of the Province of Ontario, Canada and has not been dissolved;
3. by letter dated March 11, 2010, the Corporation received from the Federal Energy Regulatory Commission authorization, effective March 31, 2010, to make wholesale sales of electricity in interstate commerce in the United States at market-based rates;
4. the Corporation has the corporate power and capacity to execute and deliver the Application, and has taken all corporate action required to be taken by the Corporation to authorize the execution and delivery of the Application; and

5. to the best of our knowledge and belief, the Corporation has complied with all pertinent federal and state laws related to the Application.

This opinion is being delivered to you in support of the Application and may not be relied upon or distributed, in whole or in part, to any other person, entity or governmental body, agency or commission or for any other purpose without, in each case, our prior written consent.

Yours truly,

Fogler, Rubinoff LLP

EXHIBIT C
Cross-boarder Transmission Facilities

Present Owner	Location	Voltage	Presidential Permit No. including any subsequent amendments
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	2-500-kV	PP-10
	Nelway, WA	230-kV	PP-36
	Nelway, WA	230-kV	PP-46
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 (Not yet constructed or placed in operation)
Joint Owners of the Highgate Project	Highgate, VT	120-kV	PP-82
Long Sault, Inc.	Massena, NY	2-115-kV	PP-24
Main Electric Power Company	Houlton, ME	345-kV	PP-43
Main Public Service Company	Limestone, ME	69-kV	PP-12
	Fort Fairfield, ME	69-kV	PP-12
	Madawaska, ME	138-kV	PP-29
	Aroostook, ME	2-69-kV	PP-29
Minnesota Power, Inc.	International Falls, MN	115-kV	PP-78
	Roseau County, MN	50 kV	PP-398 (Not yet constructed or placed in operation)
Minnkota Power Cooperative	Roseau County, MN	230-kV	PP-61
New York Power Authority	Massena, NY	756-kV	PP-56
	Massena, NY	2-230-kV	PP-25
	Niagara Falls, NY	2-345-kV	PP-74
	Devils Hole, NY	230-kV	PP-30
Niagara Mohawk Power Corp.	Devils Hole, NY	230-kV	PP-190
	Buffalo, NY	115-kV	PP-190
	Lewiston, NY	115-kV	PP-190
	Devils Hole, NY	69-kV	PP-190

	Lewiston, NY	69-kV	PP-190
	Buffalo, NY	38-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	± 150 -kV DC	PP-299 (Not yet constructed or placed in operation)
Vermont Electric Power Co.	Derby Line, VT	120-kV	PP-66
Vermont Electric Transmission Co.	Norton, VT	± 450 -kV DC	PP-76

EXHIBIT D
Power of Attorney with Agent Residing in the United States

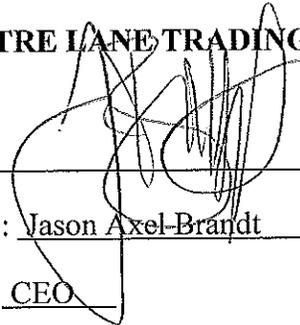
**IRREVOCABLE LIMITED
POWER OF ATTORNEY**

This IRREVOCABLE POWER OF ATTORNEY is made March 5, 2020 by Centre Lane Trading Limited (the "Principal"), a corporation incorporated under the laws of the Province of Ontario, with its executive offices located in Toronto, Ontario, Canada.

1. Appointment. The Principal does hereby appoint Christopher Brown , CT Corporation System, whose principal place of business is at 1015 15th Street N.W., Suite 1000, Washington, D.C. 20005, 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 Authority is irrevocable by the Principal for the five year term of the authorization to export electricity to Canada.

IN WITNESS WHEREOF, the Principal has caused this Power of Attorney to be duly executed on this 5^h day of March, 2020.

CENTRE LANE TRADING LIMITED

By:  _____

Name: Jason Axel-Brandt _____

Title: CEO _____

This instrument was acknowledged before me on the 5th day of March, 2020 in Toronto, Ontario, Canada.

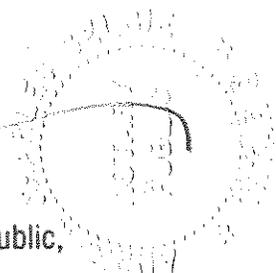
 
Andrew Charles Selbie, Notary Public,
City of Toronto,
Limited to the attestation of Instruments and the taking of affidavits,
For Mackie Research Capital Corporation. Expires September 07, 2022.

EXHIBIT E

Not Applicable

EXHIBIT F

Not Applicable

Signed Verification

VERIFICATION

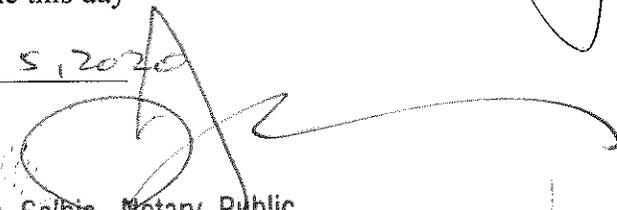
PROVINCE OF ONTARIO) ss:

Jason Brandt, being duly sworn, states that he is the CEO, Centre Lane Trading Limited, that he is authorized to execute this Verification, that he has read the above and foregoing document and is familiar with the contents thereof, and that all allegations of fact therein contained are true and correct to the best of his knowledge and belief.


Jason Brandt
CEO, Centre Lane Trading Limited

Sworn to me this day

MARCH 5, 2020


Andrew Charles Selbie, Notary Public,
City of Toronto,
Limited to the attestation of Instruments and the taking of affidavits,
For Mackie Research Capital Corporation. Expires September 07, 2022.