

May 21, 2020

Mr. Christopher A. Lawrence
U.S. Department of Energy
Office of Electricity
OE-20, Room 8G-024
1000 Independence Avenue, S.W.
Washington, DC 20585

Re: Application of Morgan Stanley Capital Group Inc. for Renewal of Authorization to
Transmit Electricity from the United States to Canada
Docket No. EA-185-__

Dear Mr. Lawrence:

Please find enclosed (i) an original and two copies of the “Application of Morgan Stanley Capital Group Inc. for Renewal of Authorization to Transmit Electricity from the United States to Canada” as required by 10 C.F.R. § 205.307 (2019), and (ii) a check in the amount of \$500 for the filing fee payable to the Treasurer of the United States as required by 10 C.F.R. § 205.309 (2019). A copy of the Application is being served contemporaneously upon the Federal Energy Regulatory Commission as required by 10 C.F.R § 205.309 (2019).

Also enclosed is an additional copy of this filing labeled “stamp and return.” Please date-stamp the additional copy for return to us via the enclosed FedEx envelope. Thank you for your attention to this matter. Please contact us if there are any questions.

Sincerely,



Daniel E. Frank
Martha M. Hopkins

Attorneys for Morgan Stanley Capital Group Inc.

Enclosures

cc: Federal Energy Regulatory Commission

sufficiency of electric supply within the United States nor does it or will it impede or tend to impede the coordination in the public interest of facilities subject to the jurisdiction of the Federal Energy Regulatory Commission (“FERC”).

II. DESCRIPTION OF APPLICANT

Applicant’s exact legal name is “Morgan Stanley Capital Group Inc.”⁴ It does not have any partners,⁵ and is not seeking authorization to export power on behalf of, or in conjunction with, any partners or partnership. Communications regarding this Application should be addressed to:⁶

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MSCG is a Delaware corporation with its principal place of business in New York, New York.⁷ MSCG is an indirect, wholly-owned subsidiary of Morgan Stanley. Morgan Stanley, a Delaware corporation, is a publicly-traded global financial services firm that, through its subsidiaries and affiliates, advises and originates, trades, manages, and distributes capital for governments, institutions, and individuals.

⁴ See 10 C.F.R. § 205.302(a) (2019).

⁵ See 10 C.F.R. § 205.302(b) (2019).

⁶ See 10 C.F.R. § 205.302(c) (2019).

⁷ See 10 C.F.R. § 205.302(d) (2019).

MSCG is a power marketer⁸ authorized by FERC to make wholesale power sales at market-based rates.⁹ In addition to power, MSCG facilitates customer transactions in wholesale natural gas and other physically- and financially-settled energy products. MSCG does not directly own or control any electric generation or transmission facilities, nor does it hold a franchise or service territory for the transmission, distribution, or sale of electric power. MSCG has rights to certain generation capacity and energy that it has purchased from third parties under long-term contracts,¹⁰ and is affiliated with certain generation owners, as follows:¹¹

- MSCG holds long-term tolling agreements and long-term firm power purchase agreements with generating facilities totaling 436 MW in the Southern Company (“SoCo”) balancing authority area (“BAA”). MSCG is also a party to certain power purchase and scheduling agent services agreements with rural electric cooperatives located in Georgia that provide

⁸ As used herein, the terms “marketer” and “power marketer” mean an entity that buys and sells electric power for its own account.

⁹ See *Morgan Stanley Capital Group Inc.*, 69 FERC ¶ 61,175 (1994) (granting market-based rate authority to MSCG), *reh’g denied*, 72 FERC ¶ 61,082 (1995); see also *64KT 8me LLC, et al.*, Docket Nos. ER18-1775-001, *et al.*, Letter Order (June 14, 2019) (unpublished) (accepting most recent notice of change in status and tariff revisions of, among others, MSCG and affiliates in Docket Nos. ER10-2906-011, *et al.*); *Morgan Stanley Capital Group Inc., et al.*, Docket Nos. ER10-2906-013, *et al.*, “Updated Market Power Analysis for the Northwest Region and Notice of Change in Status” (filed Dec. 27, 2019) (most recent market power analysis and change-in-status filing by MSCG and affiliates). As noted, the Department previously authorized MSCG to export electricity to Canada. See *Morgan Stanley Capital Group Inc.*, Order No. EA-185 (Aug. 21, 1998); *Morgan Stanley Capital Group Inc.*, Order No. EA-185-A (Aug. 14, 2000); *Morgan Stanley Capital Group Inc.*, Order No. EA-185-B (Aug. 19, 2005); *Morgan Stanley Capital Group Inc.*, Order No. EA-185-C (June 9, 2010); *Morgan Stanley Capital Group Inc.*, Order No. EA-185-D (July 8, 2015).

¹⁰ “Long-term” means a term of a year or longer.

¹¹ Although the Department’s regulations do not specifically require a listing of an applicant’s generating facilities, MSCG provides here a brief discussion of the electric generation that it has purchased, controls, and/or is affiliated with so that the Department can be assured that, for the reasons discussed herein, any exports of electricity by MSCG will not impair the sufficiency of the electricity supply in the United States.

MSCG the right and/or obligation to schedule certain of the cooperatives' resources in the SoCo BAA.

- MSCG has a long-term tolling agreement with Red Oak Power, LLC (“Red Oak Power”), which owns and operates a 766 MW gas-fired generator in the PJM Interconnection, L.L.C. (“PJM”) BAA. Red Oak Power is an affiliate of MSCG through common upstream ownership by Morgan Stanley.
- MSCG also owns MS TGX LLC, which is the general partner of TAQA Gen X, LP (“TGX”), which indirectly owns TAQA Gen X LLC (“TAQA”), a power marketer with market-based rate authorization.¹² TAQA is authorized by FERC to sell electricity at market-based rates.¹³ TAQA does not own or operate any electric generation, transmission, or distribution facilities, but is party to a long-term tolling agreement with Red Oak Power.
- MSCG has two long-term power purchase agreements with Public Utility District No. 1 of Chelan County, Washington (“CHPD”) for a total of 174 MW in the CHPD BAA.
- MSCG has two long-term power purchase agreements with Public Utility District No. 2 of Grant County, Oregon (“GCPD”) for a total of 261 MW in the GCPD BAA.
- MSCG purchases 101 MW from Seattle City Light under a long-term power purchase agreement, in the Idaho Power Company (“IPC”) BAA.
- In the Bonneville Power Administration (“BPA”) BAA, MSCG purchases the following amounts of power from the following entities: 19 MW from the Eugene (Oregon) Water and Electric Board; 28 MW from Lakeview Green Energy, Inc.; 52 MW from The Energy Authority; and 100 MW from Sagebrush LLC (the Kittitas Valley Wind Farm).
- In the Avista Energy BAA, MSCG purchases 231 MW under two long-term power purchase agreements with Avista Corp.
- Morgan Stanley Energy Structuring, L.L.C. (“MSES”), a wholly-owned, indirect subsidiary of MSCG, is a power marketer authorized by FERC to sell power at market-based rates.¹⁴ MSES does not own electric generation or transmission facilities.

¹² See *TAQA Gen X LLC*, 133 FERC ¶ 62,180 (2010).

¹³ See *BE Allegheny LLC*, Docket Nos. ER07-1112-000, *et al.* (unpublished letter order issued Aug. 9, 2007) (granting market-based rate authority); *BE Red Oak LLC and TAQA Gen X LLC*, Docket Nos. ER07-1119-006, *et al.* (unpublished letter order issued Apr. 30, 2009) (accepting notice of succession).

¹⁴ See *Morgan Stanley Energy Structuring, L.L.C.*, Docket No. ER19-1716-000 (June 17, 2019) (letter order issued accepting name change of Power Contract Financing II, L.L.C. to MSES); see also *Power Contract Financing II, L.L.C. and Power Contract Financing II, Inc.*, Docket Nos. ER03-1108-000 and ER03-1109-000 (unpublished letter order issued Sept. 25, 2003) and *Utility*

- MS Solar Solutions Corp. (“MS Solar”), a wholly-owned, indirect subsidiary of MSCG, is authorized by FERC to make market-based rate sales.¹⁵ MS Solar, among other things, finances the procurement and installation of solar panels for behind-the-meter distributed solar projects, but does not own electric generation or transmission facilities.
- MSCG is a party to a scheduling agreement with Deseret Generation & Transmission Cooperative (“Deseret”) that provides MSCG the right and/or obligation to schedule certain Deseret resources located in the PacifiCorp BAA.
- MSCG is affiliated through common upstream ownership with NaturEner Glacier Wind Energy 1, LLC (“Glacier 1”), NaturEner Glacier Wind Energy 2, LLC (“Glacier 2”), and NaturEner Rim Rock Wind Energy, LLC (“Rim Rock”), which own and operate wind generating facilities in the NorthWestern Energy (“NWE”) BAA. The output of these facilities is sold to MSCG under long-term power purchase agreements. Glacier 1, Glacier 2, and Rim Rock are exempt wholesale generators (“EWG”)¹⁶ with market-based rate authority.¹⁷ Rim Rock also has assigned to MSCG transmission rights on the Montana-Alberta Tie Line (“MATL”).
- MSCG is affiliated through common upstream ownership with market-based rate sellers NaturEner Montana Wind Energy, LLC; NaturEner Power Watch, LLC; and NaturEner Wind Watch, LLC. These entities provide or may provide various services to Glacier 1, Glacier 2, and/or Rim Rock.

Contract Funding II, LLC, Docket No. ER04-733-000 (unpublished letter order issued May 21, 2004) (accepting notices of succession).

¹⁵ See *MS Retail Development Corp.*, Docket No. ER03-1315-000 (unpublished letter order issued Oct. 21, 2003) (granting market-based rate authorization to predecessor in interest to MS Solar); *MS Solar Solutions Corp.*, Docket Nos. ER08-1432-000 and ER08-1432-001 (unpublished letter order issued Oct. 9, 2008) (accepting revised market-based rate tariff and notice of succession reflecting name change).

¹⁶ See *AltaGas Renewable Energy Colorado LLC*, Docket Nos. EG12-70-000, *et al.* (unpublished letter order issued Sept. 10, 2012) (noticing effectiveness of EWG status of, among others, Glacier 1); *EC&R Papalote Creek I, LLC*, Docket Nos. EG09-39-000, *et al.* (unpublished letter order issued Sept. 10, 2009) (noticing effectiveness of EWG status of, among others, Glacier 2); *AltaGas Renewable Energy Colorado LLC*, Docket Nos. EG12-70-000, *et al.* (unpublished letter order issued Sept. 10, 2012) (noticing effectiveness of EWG status of, among others, Rim Rock).

¹⁷ See *NaturEner Glacier Wind Energy 1, LLC*, Docket No. ER08-1261-000 (unpublished letter order issued Aug. 28, 2008) (granting market-based rate authorization); *NaturEner Montana Wind Energy 2, LLC*, Docket Nos. ER09-1182-000, *et al.* (unpublished letter order issued July 8, 2009) (granting market-based rate authorization); *NaturEner Rim Rock Wind Energy, LLC*, Docket No. ER12-295-000 (unpublished letter order issued Dec. 21, 2011) (granting market-based authorization).

- MSCG is a party to one of the two transmission service reservation agreements (“TSR Agreements”) for the 300 MW of northbound transmission capacity on the MATL line, and, as noted above, is the assignee of the other TSR Agreement. MATL (along with Montana Alberta Tie Ltd.) owns and operates a 214-mile, 230-kV bidirectional AC transmission line, with a rated capacity of 300 MW, extending from Lethbridge, Alberta, Canada to Great Falls, Montana. MATL owns the U.S. portion of the MATL project, which is in the NWE BAA. Service under the TSR Agreements is provided pursuant to FERC-approved negotiated rate authority under a FERC-approved open access transmission tariff (“OATT”).¹⁸
- MSCG is affiliated through common upstream ownership with Bayonne Energy Center, LLC, which owns and operates a 642 MW (nameplate) gas-fired generating facility in the New York Independent System Operator (“NYISO”) BAA.
- MSCG is affiliated through common upstream ownership with Zone J Tolling Co., LLC, a power marketer with market-based rate authority in the NYISO BAA.
- MSCG is affiliated through common upstream ownership with Loraine Windpark Project, LLC, a 150 MW wind generating facility located and selling power within the Electric Reliability Council of Texas (“ERCOT”) region.

MSCG is also affiliated, via common upstream ownership and control, with other entities that have passive investment interests in electric generating facilities and associated interconnection facilities. MSCG’s parent company Morgan Stanley also owns, indirectly through other of its wholly-owned subsidiaries, behind-the-meter solar installations that provide power to on-site, behind-the-meter load for commercial and residential properties, located primarily in California.

Other than the facilities described above, neither MSCG nor any of its affiliates owns or controls any electric power generation or transmission facilities and none of them has a franchised electric power service area. MSCG operates as a power marketer, sells and buys electric power at wholesale, and arranges services in related areas. MSCG has purchased, or will purchase, the

¹⁸ See *MATL LLP, et al.*, 170 FERC ¶ 61,297 (2020) (reauthorizing negotiated rate authority for MATL); *MATL LLP*, 147 FERC ¶ 61,010 (2014) (accepting MATL OATT).

power that may be exported to Canada from wholesale generators, electric utilities, and federal power marketing agencies. MSCG will have title to any electricity transmitted to Canada under the authorization sought in this Application. This Application relates to MSCG as a marketer of electric power only.

III. JURISDICTION

The Department has jurisdiction over the action proposed in this Application under FPA § 202(e).¹⁹ No other known federal, state, or local government has jurisdiction over the action to be taken under the authority sought in this Application,²⁰ except to the extent that MSCG must comply with applicable FERC requirements in making sales at wholesale. FERC's address is:

Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

IV. FACILITIES

MSCG is seeking to renew its authorization to export power to Canada as a power marketer over any authorized international transmission facility that is appropriate for open access transmission by third parties in accordance with the export limits authorized by the Department, including the facilities set forth in Attachment 1.²¹

V. TECHNICAL DISCUSSION

MSCG plans to export electric power over authorized transmission interconnections between Canada and the United States. Transmission to the point of delivery will be arranged by

¹⁹ See 16 U.S.C. § 824a(e).

²⁰ See 10 C.F.R. § 205.302(e) (2019).

²¹ See 10 C.F.R. § 205.302(f) (2019).

MSCG over any authorized existing international electric transmission facilities (including those set out in Attachment 1), and over any international transmission facilities that may be approved by the Department in the future.

MSCG does not currently own or control electric generation or transmission facilities, and does not have a power supply of its own in the United States on which its exports of power could have a reliability, fuel use, or system stability impact.²² MSCG has purchased, or will purchase, the electric power that it may export, on either a firm or an interruptible basis, from wholesale generators, electric utilities, and federal power marketing agencies voluntarily, and therefore will be surplus to the needs of the selling entities. Accordingly, the proposed exports will not impair or tend to impede the sufficiency of electric power supplies in the United States or the regional coordination of electric utility planning or operations.²³ Additionally, as a power marketer that does not own or operate a transmission system (and therefore must acquire transmission service under open access transmission and similar tariffs), MSCG does not have the ability to cause a violation of the terms and conditions in the existing authorizations associated with international transmission facilities. Specifically, MSCG does not have the ability to cause total exports on Presidential Permit facilities to exceed the authorized instantaneous transmission rate.

MSCG will make all necessary commercial arrangements and will obtain any and all other regulatory approvals required in order to carry out any power exports. This would include: (1) scheduling each transaction with the appropriate balancing authority area in compliance with all reliability criteria, standards, and guidelines of the North American Electric Reliability

²² Please see Section II, *supra*, for a discussion of MSCG's interests in generating facilities.

²³ See 10 C.F.R. § 205.302(g) (2019).

Corporation and the relevant Regional Entities (collectively, “NERC”) in effect at the time of export, and (2) obtaining all necessary transmission access over approved export facilities. MSCG agrees to abide by the export limits contained in the relevant export authorization of any transmission facilities over which MSCG exports electric power to Canada. The controls that are inherent in any transaction that complies with all NERC requirements and the export limits imposed by the Department on the international transmission facilities are sufficient to ensure that exports by MSCG would not impede or tend to impede the coordinated use of transmission facilities within the meaning of FPA § 202(e).

In previous orders granting export authorizations to electric power marketers, the Department declined to rigidly apply the information filing requirements contained in its regulations and instead used a flexible approach that takes into consideration the unique nature of power marketers and previously authorized export limits of cross-border facilities.²⁴ These same considerations demonstrate that MSCG’s proposed exports will not impair or tend to impede the sufficiency of electric supplies in the United States or the regional coordination of electric utility planning or operations.

²⁴ See, e.g., *NorAm Energy Services, Inc.*, No. EA-105-CN (Aug. 16, 1996); *MidCon Power Services Corp.*, No. EA-114 (July 15, 1996); *USGen Power Services*, No. EA-112 (June 27, 1996); *CNG Power Services Corp.*, No. EA-110 (June 20, 1996); *Destec Power Services, Inc.*, No. EA-113 (May 31, 1996); *North American Energy Conservation, Inc.*, No. EA-103 (May 30, 1996); *NorAm Energy Services, Inc.*, No. EA-105-MX (May 30, 1996); *Enron Power Marketing, Inc.*, No. EA-102 (Feb. 6, 1996); *Morgan Stanley Capital Group Inc.*, No. EA-185-A-CN (Aug. 14, 2000); *Saracen Energy Partners, LP*, No. EA-340 (June 18, 2008); *Castleton Commodities Merchant Trading L.P.*, No. EA-359-B (Oct. 2, 2014); *Morgan Stanley Capital Group Inc.*, No. EA-185-D (July 8, 2015); *Northland Power Energy Marketing (US) Inc.*, No. EA-473 (June 18, 2019); *Macquarie Energy LLC*, Np. EA-479 (Nov. 21, 2019).

VI. CONSISTENCY WITH LEGAL REQUIREMENTS

Authorization of the exports proposed by MSCG is consistent with United States energy policy and will foster development of a more efficient and competitive North American energy market. MSCG will conduct all operations pursuant to this authorization 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 operator(s), including any applicable regional transmission organizations or independent system operators.

Because the proposed exports will occur over existing transmission facilities, MSCG respectfully submits that the Application qualifies for a categorical exclusion under the National Environmental Policy Act of 1969, such that neither an Environmental Agreement nor an Environmental Impact Statement is required.²⁵

Finally, MSCG will continue to comply with such requirements as may be imposed by the Department on other power marketers with blanket electricity export authorization, including making periodic reports to the Department regarding exports, as may be applicable or required.

VII. EXHIBITS

MSCG includes the following Exhibits with this Application:

- Exhibit A (10 C.F.R. § 205.303(a)) – Export Agreements. MSCG is the customer under the two TSR Agreements for 300 MW of the northbound capacity on the MATL line in the NWE BAA. The TSR Agreements are service agreements entered

²⁵ The Department previously determined that MSCG qualified for a NEPA categorical exclusion. See *Morgan Stanley Capital Group Inc.*, Order No. EA-185-D at 8 (July 8, 2015).

into under, and are governed by, the FERC-approved MATL open access transmission tariff (“OATT”) and publicly available on the Open Access Same-Time Information System (“OASIS”). To the extent necessary, MSCG requests a waiver of the requirement to provide a copy of the two TSR Agreements with this Application.

- Exhibit B (10 C.F.R. § 205.303(b)) – Opinion of Counsel. Attached as Exhibit B is the legal opinion of counsel that the proposed exports are within MSCG’s corporate power and that MSCG will comply with all pertinent federal and state laws.
- Exhibit C (10 C.F.R. § 205.303(c)) – Maps. Not Applicable. MSCG has no “system” of its own to export electricity. Therefore, no maps are available to include as Exhibit C. Additionally, as described above, MSCG requests renewal of its authorization to export energy to Canada over any international transmission facility authorized by Presidential Permit that is appropriate for open access transmission by third parties in accordance with the assessment made by the Department of the transmission limits for operation in the export mode.
- Exhibit D (10 C.F.R. § 205.303(d)) – Agent for Foreign Entities. Not Applicable. MSCG has offices in the United States and therefore no designated agent residing within the United States is required.
- Exhibit E (10 C.F.R. § 205.303(e)) – Statement of Corporate Relationship. Not Applicable. MSCG does not have any corporate relationship or existing contract between it and any other person, corporation, or foreign government, which in any

way relates to the control or fixing of rates for the purchase, sale, or transmission of electric energy.

- Exhibit F (10 C.F.R. § 205.303(f)) – Operating Procedures. Not Applicable. Neighboring utilities may be informed of any excess capacity and energy by participating in the competitive wholesale markets in the relevant areas.
- Attachment 1 – Export Facilities. A list of international transmission lines at the U.S.-Canadian border authorized for third-party use is attached to this Application as Attachment 1.
- Attachment 2 – Verification. MSCG has attached as Attachment 2 a signed verification of the factual representations in this Application.²⁶

To the extent necessary, MSCG requests a waiver of the requirement to provide the exhibits that are not applicable to this Application, as noted.

²⁶ See 10 C.F.R. § 205.302(h) (2019); 28 U.S.C. § 1746.

VIII. CONCLUSION

In order to maintain all regulatory authorizations for participation in emerging market opportunities, Morgan Stanley Capital Group Inc. respectfully requests that the Department grant this Application and issue the requested reauthorization by no later than August 21, 2020, the date MSCG's current authorization is set to expire.

Respectfully submitted,



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Attorneys for Morgan Stanley Capital Group Inc.

Date: May 21, 2020

EXHIBITS A, C, D, E, and F
(NOT APPLICABLE)

EXHIBIT B
OPINION OF COUNSEL

May 18, 2020

United States Department of Energy
Office of Electricity
Washington, DC

Re: Application of Morgan Stanley Capital Group Inc. for Renewal of Authorization to Transmit Electric Energy from the United States to Canada (Docket No. EA-185)

Ladies and Gentlemen:

I am counsel to Morgan Stanley Capital Group Inc., a Delaware corporation (“MSCG”), and have represented MSCG in connection with the Application of Morgan Stanley Capital Group Inc. for Renewal of Authorization to Transmit Electricity from the United States to Canada (the “Application”). I am an attorney-at-law, authorized to practice law in the State of New York. I am employed as Managing Director and Counsel of Morgan Stanley & Co. LLC and am counsel to MSCG.

I have examined such corporate records, certificates and other documents, and such questions of law, as I have considered necessary or appropriate for the purposes of this opinion. Upon the basis of such examination and as of the date hereof, it is my opinion that:

- (1) MSCG is duly incorporated, validly existing, and in good standing under the laws of the State of Delaware.
- (2) MSCG has the corporate power and authority to engage in the exportation of electric energy as described in the Application.
- (3) Based upon my knowledge of the facts and the law, including as a result of my consultation with outside counsel, following the issuance of the authorization sought in the Application, MSCG shall have complied with all Federal and state laws applicable to the export of electric energy as requested in the Application.

The foregoing opinion is limited to the Federal laws of the United States, the laws of the State of New York and the General Corporation Law of the State of Delaware as of the date hereof, and I am expressing no opinion as to the effect of the laws of any other jurisdiction.

In rendering this opinion, I have relied as to certain matters on information obtained from public officials, officers of MSCG and other sources believed by me to be responsible, and I have assumed that the signatures on all documents examined by me are genuine, assumptions which I have not independently verified.

I am furnishing this opinion solely for your benefit in connection with the Application. This opinion may not be relied upon by you for any other purpose or relied upon by or furnished to any other person without my express written consent.

Very truly yours,

/s/ Edward J. Zabrocki
Edward J. Zabrocki
Managing Director and Counsel
Morgan Stanley & Co. LLC

Dated: May 18, 2020

ATTACHMENT 1

**Transmission Facilities Located
at the U.S. – Canadian Border
Authorized for Third-Party Use***

<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 Administrative	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**
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	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
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-305***
New York Power Authority	Massena, NY	765-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
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**
Vermont Electric Power Co.	Derby Line, VT	120-kV	PP-66
Vermont Electric Transmission Co.	Norton, VT	±450-kV DC	PP-76

* As described in the Application, MSCG requests authority to export electricity over any authorized international transmission facility, including but not limited to those set forth in this Attachment 1.

** These facilities have been authorized but not yet constructed or placed into operation.

*** The Presidential Permit issued in PP-305 was later rescinded by and re-issued as PP-399.

ATTACHMENT 2

Verification

VERIFICATION

STATE OF NEW YORK)
)
CITY OF NEW YORK)

Declaration Under Penalty of Perjury
(28 U.S.C. § 1746)

I, Karen Kochonies, as Vice President of Morgan Stanley Capital Group Inc. (“MSCG”), am authorized to provide this verification on behalf of MSCG and have knowledge of the matters set forth in the foregoing Application of Morgan Stanley Capital Group Inc. for Renewal of Authorization to Transmit Electricity from the United States to Canada. I hereby verify under penalty of perjury that the foregoing Application is true and correct.

Executed on May 20, 2020



Karen Kochonies
Vice President