

July 29, 2020

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

Ruta Kalvaitis Skučas

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Admitted in Maryland, DC and NY

**Re: Application of Roctop Investments Inc. for Renewal of Authority to
Transmit Electric Energy to Canada**

PUBLIC VERSION

Dear Mr. Lawrence:

Pursuant to 10 C.F.R. § 205.300, *et seq.* of the regulations of the Department of Energy, enclosed for filing on behalf of Roctop Investments Inc. (“Roctop”) is an original copy of an Application for Renewal of Authority to Transmit Electric Energy to Canada. Roctop respectfully requests that this application be accorded confidential treatment and not be released to the public. We enclose a public version suitable for publication, with the confidential information redacted.

Should you have any questions or concerns regarding this matter, please do not hesitate to contact the undersigned.

Respectfully submitted,



Ruta Kalvaitis Skučas, Esq.
Maev C. Tibbetts, Esq.
Pierce Atwood LLP
1875 K St N.W., Suite 700
Washington, D.C. 20006
Telephone: (202) 530-6428
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Attorneys for Roctop Investments Inc.

**UNITED STATES OF AMERICA
BEFORE THE
DEPARTMENT OF ENERGY
OFFICE OF ELECTRICITY DELIVERY AND ENERGY RELIABILITY**

Roctop Investments Inc.

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Docket No. EA-____-____

**APPLICATION OF ROCTOP INVESTMENTS INC. FOR RENEWAL OF AUTHORITY
TO TRANSMIT ELECTRIC ENERGY TO CANADA**

PUBLIC VERSION

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.*, Roctop Investments Inc. (“Roctop” or “Applicant”) hereby submits this application for a five-year extension of its blanket authorization to export electricity from the United States to Canada (“Renewal Application”). The Department of Energy (“DOE”) previously granted Roctop original authorization to export electric energy as a power marketer on September 29, 2015 in Order No. EA-414 (“2015 Order”). Roctop requests that this renewal application be made effective no later than September 29, 2020, the date on which its current authorization to export electricity from the United States to Canada expires, to prevent any lapse in authority. Roctop respectfully requests authorization for renewal of authority to transmit electric energy from the United States to Canada for a period of five (5) years.

I. COMMUNICATIONS

Communications and correspondence concerning this filing should be addressed to:

Ruta Kalvaitis Skučas
Pierce Atwood LLC
1875 K St., NW Suite 700
Washington, DC 20006
Tel. (202) 530-6428
rskucas@pierceatwood.com

Vincent Thellen
President
139 Du Domaine Rd
Lefaivre, (ON) Canada K0B 1J0
Tel: (613)-793-2718
vincent@roctop.ca

II. DESCRIPTION OF APPLICANT

Roctop is a Canadian company, created under a Canadian Federal Charter, with its principle place of business in Lefaiivre, Ontario. Roctop is owned by three common shareholders, and one preferred shareholder, who are identified in Exhibit H of the confidential version of this filing. Roctop does not have any affiliates or upstream owners that possess any ownership interest or have involvement in any other company that is a traditional utility or that owns, operates, or controls any electric generation, transmission or distribution facilities, nor do they have any direct involvement with the energy industry other than through the ownership of Roctop.

The U.S. Federal Energy Regulatory Commission ("FERC") authorized Roctop to engage in wholesale sales of electric power and capacity at market-based rates.¹ A copy of this order is attached as Exhibit G.

III. JURISDICTION

Roctop believes that the U.S. Department of Energy ("DOE") is the only governmental agency that has jurisdiction over this application.

IV. DESCRIPTION OF TRANSMISSION FACILITIES

Roctop intends to export electricity over existing international transmission facilities between Canada and the United States, as identified in Exhibit C. Roctop requests authority to export electricity to Canada over any international transmission facility authorized by

¹ See *Roctop Investments, Inc.*, Docket No. ER15-1971-000 (delegated letter order issued July, 2015).

Presidential Permit that is appropriate for open access by third parties in accordance with the assessment made by DOE of the transmission limits for operation in the export mode.

V. TECHNICAL DISCUSSION OF PROPOSAL

Section 202(e) of the Federal Power Act (“FPA”) and DOE’s regulations provide that exports should be allowed unless the proposed export would impair the sufficiency of electric power supply within the United States or would tend to impede the coordinated use of the United States power supply network.² Roctop seeks blanket authority to transmit electric power to Canada as a power marketer. Roctop has no electric power supply system on which the proposed exports could have a reliability, fuel use system or stability impact. Roctop also has no obligation to serve native load usually associated with a franchised service area, and, thus, the exports proposed by Roctop will not impair its ability to meet current and prospective power supply obligations.

Roctop will purchase power to be exported from a variety of sources such as power marketers, independent power producers, or U.S. electric utilities and federal power marketing entities as those terms are defined in Sections 3(22) and 3(19) of the FPA. By definition, such power is surplus to the system of the generator and, therefore, the electric power that Roctop will export on either a firm or interruptible basis will not impair the sufficiency of the electric power supply within the U.S.³

Roctop will make all necessary commercial arrangements and will obtain any and all other regulatory approvals required in order to schedule and deliver power exports. All of the electricity exported by Roctop will be transmitted pursuant to arrangements with utilities that

² 16 U.S.C. § 824a(e).

³ See *Enron Power Marketing, Inc.*, Order EA-102 (1996).

own and 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 these transmission facilities. Roctop will schedule its transactions with the appropriate balancing authority areas in compliance with the reliability criteria standards and guidelines established by the North American Reliability Corporation (“NERC”) and its member Regional Entities in effect at the time of the export.

In previous orders granting export authorization to electric power marketers, DOE declined to rigidly apply the information filing requirements contained in its regulations and instead used a flexible approach which takes into consideration the unique nature of power marketers, the requirements of FERC Order No. 888 and previously authorized export limit of cross-border facilities.⁴ These same considerations demonstrate that the exports proposed by Roctop will not impair or tend to impede the sufficiency of electric supplies in the U.S. or the regional coordination of electric utility planning or operations.

VI. COMPLIANCE WITH CONDITIONS AND PROCEDURES

Roctop proposes to abide by the general conditions consistent with DOE’s previous grants of authorizations to power marketers as set forth in its previous orders, as described herein. From time to time, Roctop will enter into agreements with third parties which involve the export of electric power from the United States into Canada. Exports made by Roctop will not exceed the export limits for the facilities, or otherwise cause a violation of the terms and conditions set forth in the export authorizations for each. With regard to specific transactions,

⁴ See e.g. *NorAm Energy Services, Inc.*, Order No. EA-105-CN (Aug. 16, 1996); *MidCon Power Services Corp.*, Order No. EA-114 (July 15, 1996); *USGen Power Services*, No. EA-112 (June 27, 1996); *CNG Power Services Corp.*, Order No. EA-110 (June 20, 1996); *North American Energy Conservation, Inc.*, Order No. EA-103 (May 30, 1996).

Roctop will provide written evidence to DOE that it has secured sufficient transmission service for the delivery of power to the border. When scheduling the delivery of power, Roctop will comply with the applicable NERC reliability standards. For each calendar year, Roctop will provide DOE with 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.

VII. VERIFICATION, REQUIRED COPIES, AND FEE

Verification executed by authorized representatives of Roctop in accordance with 10 C.F.R. § 205.302(h) is enclosed with the Application. In accordance with the requirements of 10 C.F.R. § 205.307, and DOE’s directions, copies of the Application are being provided to the Department. In accordance with the requirements of 10 C.F.R. § 205.309, a copy of this application will be provided to the Secretary of the Federal Energy Regulatory Commission.

Payment in the amount of \$500.00 has been furnished pursuant to 10 C.F.R. § 205.309.

VIII. REQUIRED EXHIBITS

The following information is provided pursuant to the required exhibits as set forth in DOE regulations 10 C.F.R. § 205.303:

Exhibit A	Transmission Agreements	Not Applicable
Exhibit B	Opinion of Counsel	Attached
Exhibit C	Transmission Facilities	List of international transmission facilities submitted in lieu of a map
Exhibit D	Designation of Agent	Attached
Exhibit E	Statement of Corporate Relationship	Not Applicable

Exhibit F	Operating Procedures	Not Applicable
Exhibit G	FERC Market Based Rate Authority	Attached – FERC order granting Roctop Market-Based Rate Authorization under Docket No. ER15-1971-000.
Exhibit H	Confidential Ownership Information	Attached

IX. REQUEST FOR CONFIDENTIAL TREATMENT

Roctop requests confidential treatment for the information related to the individual owners of Roctop and the percentages of the company each holds, as it is commercially sensitive information, the disclosure of which would harm the company. Roctop provides the information to DOE in Exhibit H of the confidential version of this application, and has included a redacted version of Exhibit H hereto.

X. CONCLUSION

WHEREFORE, Roctop respectfully requests that DOE grant this application for renewal of blanket authorization to export power from the United States to Canada, for a period of five (5) years, with such authorization to be effective as of September 29, 2020.

Respectfully submitted,



Ruta Kalvaitis Skučas, Esq.
Maeve C. Tibbetts, Esq.
Pierce Atwood LLP
1875 K St N.W., Suite 700
Washington, D.C. 20006
Telephone: (202) 530-6428
rskucas@pierceatwood.com

Attorneys for Roctop Investments, Inc.

July 29, 2020

VERIFICATION

I, Vincent Thellen, being authorized to execute this verification and having knowledge of the matters set forth in this Application of Roctop Investments Inc., hereby verify that the contents thereof are true and correct to the best of my knowledge and belief.

Vincent Thellen
Vincent Thellen
President
Roctop Investments Inc.

Magalie Nicolau
Name of Notary Public (*printed name*)

Notary Public, Magalie Nicolau, notary

My commission expires: ∅



Me MAGALIE NICOLAU
NOTAIRE
43, PRINCIPALE
GATINEAU (QUÉBEC) J9H 3L2

EXHIBIT A – TRANSMISSION AGREEMENTS

Roctop has not entered into any transmission agreements at this time.

EXHIBIT B – OPINION OF COUNSEL

July 29, 2020

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

RE: Application of Roctop Investments Inc. for Renewal of Authorization to Export Electricity to Canada

Dear Mr. Lawrence:

Pursuant to 10 C.F.R. § 205.303(b), I hereby provide a legal opinion regarding the corporate powers of Roctop Investments Inc. to export electricity to Canada. I have examined the Articles of Incorporation of Roctop Investments Inc. (“Roctop”), as well as relevant amendments thereto. Based on my review of those documents and representations provided to me by authorized representatives of Roctop, it is my opinion that:

1. The import and export of electricity contemplated by this Application is within the corporate powers of Roctop Investments Inc.; and
2. To the best of my knowledge and belief, Roctop has directed its officers and agents to take all necessary steps to comply with all applicable state and federal laws in connection with the actions to be taken under the Application.

I am opining here only as to the federal laws of the United States, and laws of relevant states within the United States. 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 to Roctop solely to you for your exclusive use and is not to be made available or relied upon by any other person or entity without my prior written authorization.

Respectfully submitted,



Ruta Kalvaitis Skučas
Counsel for Roctop Investments Inc.

EXHIBIT C – INTERNATIONAL TRANSMISSION FACILITIES

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

Present Owner	Location	Voltage	Presidential Permit No.
Bangor Hydro Electric Co.	Baileyville, ME	345 kV	PP-89
Basin Electric Power Cooperative	Tioga, ND	230 kV	PP-64
Bonneville Power Administration	Blaine, WA	2x 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 Co.	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 ⁵
Joint Owners of the Highgate Project	Highgate, VT	120 kV	PP-82
Long Sault, Inc.	Massena, NY	2x 115 kV	PP-24
Maine Electric Power Co.	Houlton, ME	345 kV	PP-43
Maine Public Service Co.	Limestone, ME	69 kV	PP-12
	Fort Fairfield, ME	69 kV	PP-12
	Madawaska, ME	138 kV	PP-29
	Aroostock, ME	2x 69 kV	PP-29
Minnesota Power Inc.	International Falls, MN	115 kV	PP-78
Minnesota Power Inc.	Roseau County, MN	500 kV	PP-398 ⁶

⁵ These transmission facilities have been authorized but not yet constructed or placed into operation.

Present Owner	Location	Voltage	Presidential Permit No.
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	2x 230 kV	PP-25
	Niagara Falls, NY	2x 345 kV	PP-74
	Devil's Hole, NY	230 kV	PP-30
Niagara Mohawk Power Corp.	Devil's Hole, NY	230 kV	PP-190
Northern States Power Co.	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 ⁷
Vermont Electric Power Co.	Derby Line, VT	120 kV	PP-66
Vermont Electric Transmission Co.	Norton, VT	±450 kV DC	PP-76

⁶ These transmission facilities have been authorized but not yet constructed or placed into operation.

⁷ These transmission facilities have been authorized but not yet constructed or placed into operation.

EXHIBIT D – DESIGNATION OF AGENT AND POWER OF ATTORNEY

**IRREVOCABLE LIMITED
POWER OF ATTORNEY**

This IRREVOCABLE LIMITED POWER OF ATTORNEY is made on July 28, 2020 by Roctop Investments Inc. (the "Principal"), a corporation organized and existing under the Canadian Business Corporations Act, with its headquarters at 139 Du Domaine Rd., Lefaiivre, ON, Canada K0B 1J0.

1. Appointment. The Principal hereby appoints Ruta Kalvaitis Skučas of Pierce Atwood LLP as the Principal's true and lawful agent for the limited purpose set forth below.
2. Scope of Authority. Pursuant to 10 C.F.R. § 205.303(d), Attorney Skučas shall have the limited power and authority to serve as the agent for the Principal regarding all matters related to the Principal's authorization to export electricity to Canada as issued by the U.S. Department of Energy ("DOE"). This appointment will remain in effect for the duration of the authorization, a five-year period, and will terminate simultaneously with the expiration of the authorization granted by DOE.
3. Irrevocability. This Power of Attorney is irrevocable by the Principal.

IN WITNESS HEREOF, the Principal has caused this Power of Attorney to be duly executed on this 28 day of July, 2020.

By: Vincent Thellen
Vincent Thellen
President
Roctop Investments Inc.
139 Du Domaine Rd
Lefaiivre, (ON) Canada K0B 1J0

SUBSCRIBED AND SWORN BEFORE ME, this 28th day of July, 2020.

Name of Notary Public (*printed name*)

Notary Public, Magalie Nicolau
Magalie Nicolau
My commission expires: ∅

Me MAGALIE NICOLAU
NOTAIRE
43, PRINCIPALE
GATINEAU (QUÉBEC) J9H 3L2



**EXHIBIT E – STATEMENT OF ANY CORPORATE RELATIONSHIP
OR EXISTING CONTRACT**

Not Applicable

EXHIBIT F – OPERATING PROCEDURES

Not Applicable

EXHIBIT G – FERC MARKET BASED RATE AUTHORITY

*FERC order granting Market-Based Rate Authorization
Docket No. ER15-1971-000, issued on July 23, 2015.*

FEDERAL ENERGY REGULATORY COMMISSION
Washington, D.C. 20426

OFFICE OF ENERGY MARKET REGULATION

In Reply Refer To:
Roctop Investments, Inc.
Docket No. ER15-1971-000

July 23, 2015

Ms. Ruta Kalvaitis Skučas
Attorney for Roctop Investments, Inc.
Pierce Atwood LLP
900 17th Street N.W.
Suite 350
Washington, D.C. 20006

Reference: Market-Based Rate Authorization

Dear Ms. Skucas:

On June 23, 2015, you filed on behalf of Roctop Investments, Inc. (Roctop Investments) an application for market-based rate authority with an accompanying tariff. The proposed market-based rate tariff provides for the sale of energy, capacity, and ancillary services at market-based rates.¹ Roctop Investments requests waivers commonly granted to similar market-based rate applicants.

Your filing was noticed on June 24, 2015, with comments, protests or interventions due on or before July 14, 2015. None was filed.

Pursuant to the authority delegated to the Director, Division of Electric Power Regulation - West, under 18 C.F.R. § 375.307, your submittal filed in the referenced docket is accepted for filing, effective July 1, 2015, as requested.² Based on your

¹ Roctop Investments requests authorization to sell ancillary services in the markets administered by PJM Interconnection, L.L.C., New York Independent System Operator, Inc., ISO New England Inc., California Independent System Operator Corp., Midcontinent Independent System Operator, Inc., and Southwest Power Pool, Inc. Roctop Investments also requests authorization to engage in the sale of certain ancillary services as a third-party provider in other markets.

² We note that Roctop Investments is not being granted authority to make third-party sales of operating reserves to a public utility that is purchasing ancillary services to

representations, Roctop Investments meets the criteria for a Category 1 seller in all regions and is so designated.³

You state that Roctop Investments is located in Ottawa, Ontario, and intends to engage in the purchase and sale of physical and/or virtual energy in the day-ahead and real-time markets of the various independent system operators and regional transmission organizations. You further represent that Roctop Investments is wholly owned by four shareholders, and is not affiliated with any entity that owns or controls generation or transmission facilities. Further, you affirmatively state that Roctop Investments and its affiliates have not erected barriers to entry and will not erect barriers to entry into the relevant market.

You represent that Roctop Investments qualifies as a Category 1 seller in all regions because it does not own, operate or control any electric generation or transmission facilities, is not affiliated with any entity that owns, operates or controls transmission facilities, is not affiliated with a franchised public utility, and does not raise any other vertical market power concerns.

Market-Based Rate Authorization

The Commission allows power sales at market-based rates if the seller and its affiliates do not have, or have adequately mitigated, horizontal and vertical market power.⁴

satisfy its own open access transmission tariff requirements to offer ancillary services to its own customers. If Roctop Investments seeks such authority, it must make the required showing and receive Commission authorization prior to making such sales. *See Third-Party Provision of Ancillary Services; Accounting and Financial Reporting for New Electric Storage Technologies*, Order No. 784, FERC Stats. & Regs. ¶ 31,349, at PP 200-202 (2013), *order on clarification*, Order No. 784-A, 146 FERC ¶ 61,114 (2014).

³ *Market-Based Rates for Wholesale Sales of Electric Energy, Capacity and Ancillary Services by Public Utilities*, Order No. 697, FERC Stats. & Regs. ¶ 31,252 at PP 848-50, *clarified*, 121 FERC ¶ 61,260 (2007), *order on reh'g*, Order No. 697-A, FERC Stats. & Regs. ¶ 31,268, *clarified*, 124 FERC ¶ 61,055, *order on reh'g*, Order No. 697-B, FERC Stats. & Regs. ¶ 31,285 (2008), *order on reh'g*, Order No. 697-C, FERC Stats. & Regs. ¶ 31,291 (2009), *order on reh'g*, Order No. 697-D, FERC Stats. & Regs. ¶ 31,305 (2010), *aff'd sub nom. Mont. Consumer Counsel v. FERC*, 659 F.3d 910 (9th Cir. 2011), *cert. denied*, 133 S. Ct. 26 (2012).

⁴ Order No. 697, FERC Stats. & Regs. ¶ 31,252 at PP 62, 399, 408, 440.

Based on your representations, Roctop Investments' submittal⁵ satisfies the Commission's requirements for market-based rate authority regarding horizontal and vertical market power.

Roctop Investments' request for waiver of Subparts B and C of Part 35 of the Commission's regulations requiring the filing of cost-of-service information, except for sections 35.12(a), 35.13(b), 35.15 and 35.16 is granted. Roctop Investments' request for waiver of Part 41 and Part 141 of the Commission's regulations concerning accounting and reporting requirements is granted with the exception of 18 C.F.R. §§ 141.14 and 141.15.⁶ Roctop Investments' request for waiver of Part 101 of the Commission's regulations is hereby granted, with the exception that waiver of the provisions of Part 101 that apply to hydropower licensees is not granted with respect to licensed hydropower projects.⁷ Notwithstanding the waiver of the accounting and reporting requirements here, Roctop Investments is expected to keep its accounting records in accordance with generally accepted accounting principles.

Roctop Investments requests blanket authorization under Part 34 of the Commission's regulations for all future issuances of securities and assumptions of liability. A separate notice was published in the Federal Register establishing a period during which protests could be filed. None was filed. Roctop Investments is authorized to issue securities and assume obligations or liabilities as guarantor, indorser, surety, or otherwise in respect of any security of another person; provided that such issue or assumption is for some lawful object within the corporate purposes of Roctop

⁵ The next time Roctop Investments makes a market-based rate filing with the Commission, it must include a revised tariff in compliance with Appendix C – Limitations and Exemptions Regarding Market-Based Rate Authority to include appropriate citations. *Niagara Mohawk Power Corporation*, 121 FERC ¶ 61,275 (2007) at P 8. *See also*, Order No. 697-A, FERC Stats. & Regs. ¶ 31,268 at P 384.

⁶ *Citizens Energy Corp.*, 35 FERC ¶ 61,198 (1986); *Citizens Power and Light Corp.*, 48 FERC ¶ 61,210 (1989) (*Citizens Power*); *Enron Power Marketing, Inc.*, 65 FERC ¶ 61,305 (1993), *order on reh'g*, 66 FERC ¶ 61,244 (1994) (*Enron*).

⁷ Hydropower licensees are required to comply with the requirements of the Uniform System of Accounts pursuant to 18 CFR Part 101 to the extent necessary to carry out their responsibilities under Part I of the Federal Power Act (FPA). We further note that a licensee's status as a market-based rate seller under Part II of the FPA does not exempt it from its accounting responsibilities as a licensee under Part I of the FPA. *See Seneca Gen., LLC*, 145 FERC ¶ 61,096, at P 23, n.20 (2013) (citing *Trafalgar Power, Inc.*, 87 FERC ¶ 61,207, at 61,798 (1999) (noting that "all licensees are required to comply with the requirements of the Uniform System of Accounts to the extent necessary to carry out their responsibilities under [s]ections 4(b), 10(d) and 14 of the FPA")).

Investments, compatible with the public interest, and reasonably necessary or appropriate for such purposes.⁸

Roctop Investments must file an Electric Quarterly Report (EQR) with the Commission, consistent with Orders Nos. 2001⁹ and 768.¹⁰ Roctop Investments must file EQRs electronically with the Commission consistent with the procedures set forth in Order No. 770.¹¹ Roctop Investments further must timely report to the Commission any change in status that would reflect a departure from the characteristics the Commission relied upon in granting market-based rate authority in accordance with Order No. 697.¹²

This action does not constitute approval of any service, rate, charge, classification, or any rule, regulation, or practice affecting such rate or service provided for in the filed documents; nor shall such action be deemed as recognition of any claimed contractual right or obligation affecting or relating to such service or rate; and such acceptance is without prejudice to any findings or orders which have been or may hereafter be made by the Commission in any proceeding now pending or hereafter instituted by or against the applicant.

⁸ *Citizens Power*, 48 FERC ¶ 61,210; *Enron*, 65 FERC ¶ 61,305.

⁹ *Revised Public Utility Filing Requirements*, Order No. 2001, FERC Stats. & Regs. ¶ 31,127, *reh'g denied*, Order No. 2001-A, 100 FERC ¶ 61,074, *reh'g denied*, Order No. 2001-B, 100 FERC ¶ 61,342, *order directing filing*, Order No. 2001-C, 101 FERC ¶ 61,314 (2002), *order directing filing*, Order No. 2001-D, 102 FERC ¶ 61,334, *order refining filing requirements*, Order No. 2001-E, 105 FERC ¶ 61,352 (2003), *order on clarification*, Order No. 2001-F, 106 FERC ¶ 61,060 (2004), *order revising filing requirements*, Order No. 2001-G, 120 FERC ¶ 61,270, *order on reh'g and clarification*, Order No. 2001-H, 121 FERC ¶ 61,289 (2007), *order revising filing requirements*, Order No. 2001-I, FERC Stats. & Regs. ¶ 31,282 (2008).

¹⁰ *Elec. Mkt. Transparency Provisions of Section 220 of the Fed. Power Act*, Order No. 768, FERC Stats. & Regs. ¶ 31,336 (2012), *order on reh'g*, Order No. 768-A, 143 FERC ¶ 61,054 (2013).

¹¹ *See Revisions to Electric Quarterly Report Filing Process*, Order No. 770, FERC Stats. & Regs. ¶ 31,338, at P 3 (2012) (citing Order No. 2001, FERC Stats. & Regs. ¶ 31,127 at P 31).

¹² Order No. 697, FERC Stats. & Regs. ¶ 31,252 at PP 1015-1046; 18 C.F.R. § 35.42 (2013). *See also Reporting Requirement for Changes in Status for Public Utilities with Market-Based Rate Authority*, Order No. 652, FERC Stats. & Regs. ¶ 31,175, *order on reh'g*, 111 FERC ¶ 61,413 (2005).

Docket No. ER15-1971-000

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This order constitutes final agency action. Requests for rehearing by the Commission may be filed within 30 days of the date of issuance of this order, pursuant to 18 C.F.R § 385.713.

Questions regarding the above order should be directed to:

Federal Energy Regulatory Commission
Attn: Melissa Lozano
Phone: (202) 502-6267
Office of Energy Market Regulation
888 First Street, N.E.
Washington, D.C. 20426

Sincerely,

Steve P. Rodgers, Director
Division of Electric Power
Regulation - West

EXHIBIT H- OWNERSHIP INFORMATION

Confidential Information Has Been Redacted