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MAY 24 2007

Electricity, Delivery and Energy Reliability

May 24, 2007

EA-210-B

Via Messenger

Ms. Ellen Russell
Office of Electricity Delivery and Energy Reliability
United States Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0350

Re: PPL EnergyPlus, LLC

Dear Ms. Russell:

Enclosed for filing on behalf of PPL EnergyPlus, LLC please find:

1. An original and fifteen copies of the Renewal Application of PPL EnergyPlus, LLC For Authority to Export Electric Energy To Canada; and
2. A check in the amount of \$500 payable to the Treasurer of the United States as required by 10 C.F.R. § 205.309.

Respectfully submitted,



Sandra E. Rizzo

Enclosures

MAY 24 2007

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

Electricity, Delivery and Energy Reliability

In the Matter of)

PPL EnergyPlus, LLC)

Docket No. EA-210-B

**RENEWAL APPLICATION OF PPL ENERGYPLUS, LLC
 FOR AUTHORITY TO EXPORT ELECTRIC ENERGY TO CANADA**

Pursuant to § 202(e) of the Federal Power Act ("FPA"), 16 U.S.C. § 824a(e), the Department of Energy ("DOE") regulations set forth in 10 C.F.R. § 205.300 *et seq.* (the "Regulations"), and paragraph "L" of Order No. EA-210-A, PPL EnergyPlus, LLC ("PPL EnergyPlus") hereby files this Renewal Application for blanket authority to export electricity from the United States to Canada.¹ PPL EnergyPlus respectfully requests that authorization be granted for an additional 5-year term from the date the DOE grants this application.

CONTENTS OF APPLICATION

In accordance with § 205.302 of the Regulations, PPL EnergyPlus states as follows:

- a. **Legal Name of Applicant.** The legal name of the applicant is PPL EnergyPlus, LLC.

¹ The export authorization issued to PPL EnergyPlus in Order No. EA-210-A expired according to its terms on November 13, 2006. As it reported to DOE immediately upon discovery on April 4, 2007, PPL EnergyPlus inadvertently failed to file this renewal application within the six month period prior to November 13, 2006.

b. Legal Name of All Partners. PPL EnergyPlus is a wholly owned indirect subsidiary of PPL Corporation and has no partners.

c. Persons to Whom Correspondence Shall be Addressed:

Jesse A. Dillon, Esq.
Senior Counsel
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18101
Phone: (610) 774-5013
Fax: (610) 774-6726
Email: jadillon@pplweb.com

Sandra E. Rizzo, Esq.
Bracewell & Giuliani LLP
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Suite 500
Washington, DC 20006
Phone: (202) 828-5858
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d. State or Territory of Incorporation. PPL EnergyPlus is a Pennsylvania limited liability company and a wholly owned indirect subsidiary of PPL Corporation. PPL EnergyPlus does not own or control any physical electric generation or transmission facilities in the U.S. and does not have any franchised service territory in the U.S. PPL EnergyPlus is a power marketer authorized by the Federal Energy Regulatory Commission ("FERC") to sell energy, capacity and specified ancillary services at market-based rates.²

e. Governmental Agencies Having Jurisdiction. PPL EnergyPlus is not aware of any U.S. federal, state or local government agency other than DOE that has jurisdiction over the action to be taken pursuant to this Application.

f. Description of the Transmission Facilities. PPL EnergyPlus intends to export electricity over the existing international interconnection facilities as set forth in Exhibit

² *PP&L EnergyPlus Co.*, 85 FERC ¶ 61,377 (1998) (granting market-based rate authority for sales of electricity); *PP&L EnergyPlus Co., LLC*, Docket No. ER99-3779-000 (Letter Order issued Aug. 30, 1999) (permitting sale of ancillary services at market-based rates); *PPL Brunner Island, L.L.C., et al.*, 112 FERC ¶ 61,238 (2005) (accepting an updated market power analysis for PPL EnergyPlus and affiliates).

C, which lists the identities, the owners, the locations and the Presidential Permit numbers of those facilities.

g. Technical Discussion of the Proposed Export of Electricity.

Through this Renewal Application, PPL EnergyPlus seeks to renew its authority to engage in open-ended transactions to export electricity to Canada under terms and conditions to be negotiated in the future. DOE has granted such renewed authority to export electricity to Canada for PPL EnergyPlus previously, as well as for other entities, such as Tenaska Power Services and TransAlta Energy Marketing (U.S.) Inc.³

With regard to reliability requirements for transmission of electric power to be exported to Canada both within the U.S. and crossing the border into Canada, DOE has adopted a flexible approach, taking into consideration the unique nature of power marketers in terms of DOE's assessment of any reliability analysis. DOE has concluded that existing technical analyses supporting the present export authorization via international border transmission facilities are sound and will be applied to power marketers seeking to use these facilities. PPL EnergyPlus respectfully requests that DOE continue to apply this standard to this Renewal Application. In the meantime, PPL EnergyPlus commits to abide by all applicable export limits on transmitting facilities, including those of the border facilities used. PPL EnergyPlus also commits to comply fully with the terms and conditions of any export authorization granted to it by DOE.

With regard to sufficiency of electric power within the U.S., because PPL EnergyPlus has no franchised service territory and owns no generation facilities, the electric power proposed to be exported to Canada pursuant to this Application is, by

³ *Tenaska Power Services*, Order No. EA-243-10-A, issued on March 1, 2007; and *TransAlta Energy Marketing (U.S.) Inc.*, Order No. EA-216-B, issued on May 17, 2006.

definition, surplus to the needs of those entities selling electric power to PPL EnergyPlus. Therefore, the proposed export of electricity will not impair the sufficiency of electric supply within the U.S. or impede regional coordination of electric utility planning or operation.

h. Verification. The signed verification of C. Joseph Hopf, President, is attached to this Application as Exhibit H.

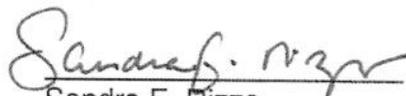
REQUIRED EXHIBITS

In accordance with § 205.303 of the Regulations, PPL EnergyPlus provides the attached Exhibits A-F.

SIGNATURE

THEREFORE, PPL EnergyPlus respectfully requests that the Department of Energy grant this Renewal Application on substantially the same terms and conditions as applied to similarly situated electric power marketers.

Respectfully submitted,



Sandra E. Rizzo
Attorney for PPL EnergyPlus, LLC

Dated this 24th day of May 2007.

Exhibit A

Agreement or Proposed Agreement Under Which Electricity Is to Be Transmitted

PPL EnergyPlus is seeking a blanket approval for export-related agreements to be negotiated and entered into in the future. No particular export transactions are currently under consideration pursuant to this Renewal Application. Accordingly, no existing agreement or proposed agreement is attached herein to this Renewal Application.

Exhibit B

Legal Opinion of Corporate Counsel of PPL EnergyPlus, LLC

Jesse A. Dillon
Senior Counsel

PPL
Two North Ninth Street
Allentown, PA 18101-1179
Tel. 610.774.5013 Fax 610.774.6726
jadillon@pplweb.com



May 23, 2007

Ms. Ellen Russell
Office of Electricity Delivery and Energy Reliability
1000 Independence Avenue, SW
Washington, DC 20585-0350

Re: Export Authority for PPL EnergyPlus, LLC

Dear Ms. Russell:

I represent PPL EnergyPlus, LLC (the "Company"), a limited liability company organized under the laws of the Commonwealth of Pennsylvania. As counsel to the Company, I have been asked to provide an opinion pursuant to 10 CFR § 205.303(b) with respect to the Company's Renewal Application for Authority to Export Electricity from the United States to Canada.

I have examined or caused to be examined on my behalf such documents, corporate records, certificates of public officials and other instruments and have conducted or caused to be conducted on my behalf such other investigations of fact and law as I have deemed necessary or advisable for purposes of this opinion.

Based upon the foregoing and subject to the qualifications set forth below, I am of the opinion that:

1. The Company has the requisite power to engage in the proposed export of electricity described in the Company's above-mentioned application.
2. Following the issuance of the export authority requested by the Company and prior to engaging in any export transactions, the Company will comply with all pertinent federal and state laws.

The opinions herein expressed are limited to matters governed by the laws of the United States of America and the laws of the Commonwealth of Pennsylvania, as they exist at the date hereof, and I express no opinion as to the law of any other jurisdiction.

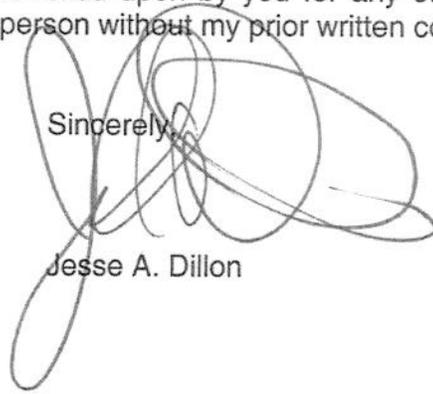
Ms. Ellen Russell

- 2 -

May 23, 2007

This opinion is rendered solely to you in connection with the above-mentioned application. This opinion may not be relied upon by you for any other purpose or relied upon or furnished to any other person without my prior written consent.

Sincerely,

A handwritten signature in black ink, consisting of several overlapping loops and a long tail extending downwards and to the left.

Jesse A. Dillon

Exhibit C
List of All Proposed Border Facilities by Presidential Permit Numbers

| <u>Presidential Permit Holder</u> | <u>Permit Number</u> | <u>Voltage</u> | <u>Location</u> |
|------------------------------------|----------------------|----------------|-------------------------|
| Basin Electric Power Cooperative | PP-64 | 230-kV | Tioga, ND |
| BPA | PP-10 | 2-500 kV | Blaine, WA |
| | PP-36 | 230-kV | Nelway, WA |
| | PP-46 | 230-kV | Nelway, WA |
| Citizens Utilities Company | PP-66 | 120-kV | Derby Line, VT |
| Detroit Edison Company | PP-221 | 345-kV | St. Clair, MI |
| | PP-221 | 230-kV | Marysville, MI |
| | PP-221 | 230-kV | Detroit, MI |
| | PP-221 | 345-kV | St. Clair, MI |
| Eastern Maine Electric Cooperative | PP-32 | 69-kV | Calais, ME |
| Joint Owners of Highgate Project | PP-82 | 120-kV | Highgate, VT |
| Long Sault, Inc. | PP-24 | 2-115-kV | Massena, NY |
| Maine Electric | PP-43 | 345-kV | Houlton, ME |
| Maine Public Service Company | PP-12 | 69-kV | Limestone, ME |
| | PP-12 | 69-kV | Fort Fairfield, ME |
| | PP-29 | 138-kV | Aroostock County, ME |
| | PP-29 | 2-69-kV | Madawaska, ME |
| Minnesota Power, Inc. | PP-78 | 115-kV | International Falls, MN |
| Minnkota Power Cooperative, Inc. | PP-61 | 230-kV | Roseau County, MN |
| New York Power Authority | PP-56 | 765-kV | Massena, NY |
| | PP-25 | 2-230-kV | Massena, NY |
| | PP-74 | 2-345-kV | Niagara Falls, NY |
| | PP-30 | 230-kV | Devils Hole, NY |
| Niagara Mohawk Power Corp. | PP-190 | 230-kV | Devils Hole, NY |
| Northern States Power Company | PP-45 | 230-kV | Red River, ND |
| | PP-63 | 500-kV | Roseau County, MN |
| Vermont Electric Transmission Co. | PP-76 | ±450-kV DC | Norton, VT |

Exhibit D
Non-U.S. Applicant's Power of Attorney

Not applicable.

Exhibit E

Existing Relationship or Existing Contract Relating to Control or Fixing of Rates

Not applicable.

Exhibit F
Operating Procedures Relating to Available Capacity and Energy

Because all of the electricity to be exported from the U.S. by PPL EnergyPlus is surplus energy purchased from other electric utilities, PPL EnergyPlus requests a waiver of the requirement set forth in § 205.303(f) of the Regulations that it explain the Operating Procedures for informing neighboring electric utilities in the U.S. that capacity or electricity in excess of the requirements of PPL EnergyPlus is available prior to its delivery to the export purchaser.

Exhibit G
Affidavit of C. Joseph Hopf

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

In the Matter of)
PPL EnergyPlus, LLC) Docket No. EA-210-____

AFFIDAVIT OF C. JOSEPH HOPF

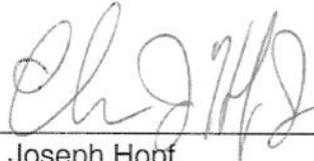
COMMONWEALTH OF PENNSYLVANIA)
COUNTY OF LEHIGH)

BEFORE ME, the undersigned authority, on this day personally appeared C. Joseph Hopf, who affirmed under oath that the following facts are true and correct and are within his personal knowledge:

1. I am more than eighteen years of age and am employed by PPL EnergyPlus, LLC ("PPL EnergyPlus") in the position of President. My duties relate to and include matters pertaining to export authorizations issued by the United States Department of Energy ("DOE") pursuant to Section 202(e) of the Federal Power Act, 16 U.S.C. § 824a(e).
2. By letter dated March 15, 2007, DOE provided a general reminder, on a courtesy basis, to PPL EnergyPlus (and, on belief, to many other entities) concerning the recordkeeping and reporting obligations of those who are authorized by DOE to export electricity from the United States to a foreign country under the statutory authority noted in the preceding paragraph.
3. After receipt of DOE's March 15th reminder letter, PPL EnergyPlus reviewed its procedures with respect to its export authorization pursuant to Order No. EA-210-A. On or about April 4, 2007, PPL EnergyPlus learned that, through administrative error, such export authorization inadvertently had been allowed to lapse before the attached renewal application was filed. On the same day, an attorney for PPL EnergyPlus self-disclosed the unintended lapse to DOE by telephone call to Mr. Anthony Como, consistent with the instructions of the reminder letter from DOE.

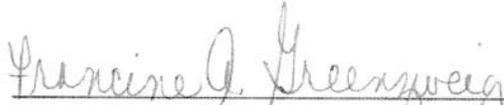
4. PPL EnergyPlus also immediately halted any exports of electricity to Canada. PPL EnergyPlus will not recommence exporting electricity to Canada unless and until DOE renews its authorization to make such exports.
5. PPL EnergyPlus did not conduct any electricity export activity pursuant to the grant of authority provided by Order No. EA-210-A. However, unaware of the lapse of export authorization in November 2006, PPL EnergyPlus sold electricity in March and April 2007 in approximately eight transactions for export into Canada from the United States. Attachment A summarizes the sales into Canada of which PPL EnergyPlus is aware after due inquiry. PPL EnergyPlus' self-disclosure to DOE on April 4, 2007 included disclosure of the existence of inadvertent cross-border trades after the lapse of the export authorization.
6. In response to the March 15 DOE letter, PPL EnergyPlus also discovered that quarterly reports were not submitted to report the lack of sales activity in 2005 and 2006. Such reports would indicate no export activity occurred pursuant to the grant of authority provided by Order No. EA-210-A.
7. At no time did PPL EnergyPlus have the intention of exporting electricity to a foreign country without the requisite authorization from the DOE or without complying with its reporting obligations.
8. PPL EnergyPlus has implemented an internal review of its export procedures with the assistance of outside counsel, and PPL EnergyPlus is diligently implementing the internal safeguards necessary to ensure that renewal applications for export authorizations and quarterly reports are filed on a timely basis in the future.

Further Affiant sayeth not.



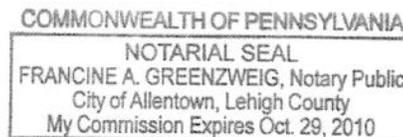
C. Joseph Hopf

SUBSCRIBED AND SWORN TO before me on this 23rd day of May, 2007, to certify which witness my hand and official seal.



Notary Public / Commonwealth of Pennsylvania

My Commission Expires: October 29, 2010



Attachment A to Affidavit by C. Joseph Hopf

PPL EnergyPlus, LLC Exports to Canada

| Delivery Day | Counterparty | Quantity (MwH) | Trade Value USD |
|--------------|--------------|----------------|-----------------|
| 03-15-2007 | IMO | 60 | \$3,493.79 |
| 03-20-2007 | IMO | 350 | \$19,952.17 |
| 03-21-2007 | IMO | 600 | \$25,955.88 |
| 03-22-2007 | IMO | 30 | \$1,891.67 |
| 03-27-2007 | IMO | 360 | \$20,195.12 |
| 03-28-2007 | IMO | 315 | \$16,188.46 |
| 04-03-2007 | IMO | 280 | \$18,172.06 |
| 04-04-2007 | IMO | 360 | \$23,320.99 |

