

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

US Department of Energy
MAR 16 2012
Electricity Delivery and
Energy Reliability

In the Matter of)

PPL EnergyPlus, LLC)

) Docket No. EA-210-C

**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 "K" of Order No. EA-210-B, PPL EnergyPlus, LLC ("PPL EnergyPlus") hereby files this Renewal Application for blanket authority to export electricity from the United States to Canada. 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 10 C.F.R. § 205.302 of the Regulations, PPL EnergyPlus states as follows:

- a. **Legal Name of Applicant.** The exact legal name of the applicant is PPL EnergyPlus, LLC.
- 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
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Sandra E. Rizzo, Esq.
Bracewell & Giuliani LLP
2000 K Street, N.W.
Suite 500
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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 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.¹

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

¹ *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 (unpublished 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); *PPL Elec. Utils. Corp., et al.*, 125 FERC ¶ 61,075 (2008) (triennial market power update); *PPL EnergyPlus, LLC, et al.*, Docket Nos. ER10-2011-002, *et al.* (unpublished Letter Order issued June 21, 2011) (accepting updated market power analysis for the Northwest region); *PPL Elec. Utils. Corp., et al.*, Docket Nos. ER10-2010-001, *et al.* (June 30, 2011) (accepting updated market power analysis for the Northeast region, including that of PPL EnergyPlus).

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.²

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

² *Tenaska Power Services*, Order No. EA-243-B, issued on January 19, 2012; and *TransAlta Energy Marketing (U.S.) Inc.*, Order No. EA-216-C, issued on May 17, 2011.

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 Robert D. Gabbard, President of PPL EnergyPlus, is attached to this Application as Exhibit G.

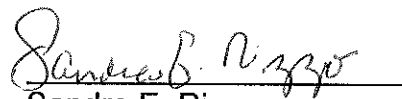
REQUIRED EXHIBITS

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,

A handwritten signature in cursive script, appearing to read "Sandra E. Rizzo", is written over a horizontal line.

Sandra E. Rizzo
Attorney for PPL EnergyPlus, LLC

Dated this 16th day of March 2012.

Exhibit A

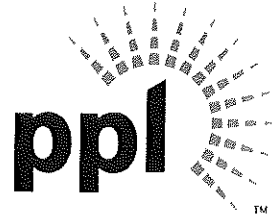
Agreement or Proposed Agreement Under Which Electricity Is to Be Transmitted

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
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March 16, 2012

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

Re: Export Authority for PPL EnergyPlus, LLC

Dear Mr. Lawrence,

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.

Mr. Christopher Lawrence

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March 16, 2012

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

Jesse A. Dillon

A large, stylized handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke, positioned to the right of the printed name.

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

Transmission Lines at the U.S. – Canada Border
Authorized for Third-Party Use

<u>Present Owner</u>	<u>Location</u>	<u>Voltage</u>	<u>Presidential Permit No.¹</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	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
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
Minnkota Power Cooperative	Roseau County, MN	230-kV	PP-61
Montana Alberta Tie Ltd.	Cut Bank, MT	230-kV	PP-305 ²

¹ These Presidential Permit numbers refer to the generic DOE permit number and are intended to include any subsequent amendments to the permit authorizing the facility.

² These transmission facilities have been authorized but not yet constructed or placed in operation.

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	\pm 450-kV DC PP -299 ³	
Vermont Electric Power Co.	Derby Line, VT	120-kV	PP-66
Vermont Electric Transmission Co.	Norton, VT	\pm 450-kV DC	PP-76

³ These transmission facilities have been authorized but not yet constructed or placed in operation.

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 10 C.F.R. § 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
Verification

VERIFICATION

I, Robert D. Gabbard, being first duly sworn, state that I am President of PPL EnergyPlus, LLC; that I am authorized to execute this verification; that I have read the above and forgoing document and its exhibits and attachments and am familiar with the contents thereof; and that, to the best of my knowledge and belief, all allegations of fact contained therein are true and correct..


Robert D. Gabbard

NOTARIZATION:

Commonwealth of Pennsylvania
County of Lehigh ss.

Sworn to (or affirmed) and subscribed before me this 16th day of March, 2012, by

Heather M. Schleicher

WITNESS my hand and official seal.

Heather M. Schleicher

Notary

