

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Algonquin Power Sanger LLC

)

Docket No. ER17-____-000

**APPLICATION OF ALGONQUIN POWER SANGER LLC
FOR ORDER ACCEPTING INITIAL TARIFF, WAIVING REGULATIONS
AND GRANTING BLANKET APPROVALS, INCLUDING
BLANKET APPROVAL UNDER PART 34 FOR ISSUANCES OF SECURITIES
AND ASSUMPTIONS OF LIABILITIES**

Pursuant to Section 205 of the Federal Power Act (“FPA”),¹ and Part 35 of the Commission’s regulations,² Algonquin Power Sanger LLC (“Applicant” or “Sanger”) hereby requests that the Commission: (i) accept for filing Sanger’s Market-Based Rate Tariff (the “Tariff”);³ (ii) grant Sanger blanket authorization to make wholesale sales of electric energy, capacity, and ancillary services at market-based rates pursuant to the terms and conditions of the Tariff; and (iii) grant such other waivers and authorizations granted to other market-based rate sellers, including blanket approval under Part 34 of the Commission’s regulations⁴ for the future issuances of securities and assumptions of liabilities.⁵ Sanger requests that the Commission grant a waiver of the prior notice requirement to allow the Tariff to become effective on January 1, 2017.

¹ 16 U.S.C. § 824d.

² 18 C.F.R. Part 35.

³ The Tariff is provided as Exhibit A.

⁴ 18 C.F.R. Part 34.

⁵ *See* 18 C.F.R. Part 34.

I. COMMUNICATIONS

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II. DESCRIPTION OF APPLICANT AND ITS AFFILIATES

A. APPLICANT

Sanger is a California limited liability company that owns and operates a 60 MW natural gas-fired generating facility (“Facility”) located in Sanger, California. Sanger is solely in the business of owning and operating the Facility. The Facility is located in the California Independent System Operator, Inc. (“CAISO”) region and is interconnected to the transmission system of Pacific Gas & Electric Co. (“PG&E”). The Facility currently operates as a cogeneration Qualifying Facility (“QF”) and sells its electricity output to PG&E and the remaining capacity to its thermal host.⁶

In early 2017, the Facility will cease operating as a cogeneration QF and will instead sell 45 to 47 MW of its capacity to PG&E pursuant to a renegotiated long-term power purchase agreement. The remaining 13-15 MW will be available for sale into the CAISO market.

Sanger’s sole and managing member is Algonquin Power Fund (America) Inc. (“APFA”), which is a wholly owned subsidiary of Algonquin Power (America) Inc. (“APA”). APA is a wholly owned subsidiary of Algonquin Power (Canada) Holdings Inc. (“APCH”).

⁶ *Algonquin Power Sanger LLC*, Docket No. QF02-97, Notice of Self-Recertification filed Feb. 19, 2010.

APCH is a subsidiary of Algonquin Power Co. (“APCo”), a trust formed under the laws of the Province of Ontario, Canada. APCO’s parent is Algonquin Power & Utilities Corp. (“APUC”), a diversified electric power generation and utility infrastructure company with a principal place of business in Oakville, Ontario. APUC is a publicly traded company on the Toronto Stock Exchange and the New York Stock Exchange.

B. APPLICANT’S AFFILIATES IN CAISO

Applicant has two QF affiliates in the CAISO Balancing Authority Area (BAA), the output of each is fully committed on a long-term basis for firm sales of one year or longer:⁷

Algonquin SKIC 10 Solar, LLC (SKIC 10) owns and operates a 10 MW solar-powered electric generating facility located in Kern County, CA. SKIC 10 has executed a 20-year, long term power purchase agreement with Southern California Edison Company (“SCE”) for the entire capacity of the facility. SKIC 10 is a QF⁸ and has been granted market-based rate authority.⁹

Algonquin SKIC 20 Solar, LLC (SKIC 20) owns and operates a 20 MW solar-powered electric generating facility located in Kern County, CA. SKIC 20 has executed a 20-year, long term power purchase agreement with PG&E for the entire capacity of the facility. SKIC 20 is a QF¹⁰ and has been granted market based rate authority.¹¹

Sanger has two public utility affiliates in first tier markets that own generation and/or provide retail service:

⁷ Order No. 816 at P 39.

⁸ *Algonquin SKIC 10 Solar, LLC*, Form 556, Docket No. QF16-1108, filed on Aug. 4, 2016.

⁹ *Algonquin SKIC 10 Solar, LLC and Algonquin SKIC 20 Solar, LLC*, Docket Nos. ER16-2364 and ER16-2169, Letter Order, issued Sept. 23, 2016.

¹⁰ *Algonquin SKIC 20 Solar, LLC*, Form 556, Docket No. QF15-215-000, filed on May 6, 2016.

¹¹ *Algonquin SKIC 10 Solar, LLC and Algonquin SKIC 20 Solar, LLC*, Docket Nos. ER16-2364 and ER16-2169, Letter Order, issued Sept. 23, 2016.

Luning Energy LLC (“Luning”) is constructing and will own and operate an approximately 50 MW solar generation project (including limited, radial electric interconnection facilities necessary to effectuate its wholesale power sales) located in Mineral County, Nevada. Through interconnection facilities which Luning will own, the Luning Project will be interconnected with the transmission system owned by Sierra Pacific Power Company d/b/a NV Energy (“NV Energy”). Luning is an EWG¹² and has been granted market-based rate authority.¹³

Liberty Utilities (CalPeco Electric) LLC (“CalPeco”) is an electric utility that serves approximately 49,000 electric customers in eastern California near Lake Tahoe. The only generation jurisdictional physical asset owned or controlled by CalPeco is the 12 MW (summer) Kings Beach diesel-fired generation facility located in Placer County, California in the Sierra Pacific Power Company (“SPPC”) Balancing Authority Area. CalPeco has on file with the Commission several agreements pursuant to which it provides wholesale capacity and energy, emergency backup services, and borderline services to SPPC and/or PG&E. CalPeco does not have a market-based rate tariff on file with the Commission. Luning will be a subsidiary company of CalPeco.

CalPeco sells power pursuant to a Commission-jurisdictional agreement on file with the Commission.¹⁴ This back up contract is a long-term firm sales agreement with a term from January 1, 2011 through December 31, 2031. All of the 12 MW is fully committed to Sierra Pacific Power Company and CalPeco for the provision of emergency back-up services. CalPeco

¹² *Luning Energy LLC*, Notice of Self Certification of Exempt Wholesale Generator Status, Docket EG16-142, filed on August 25, 2016, as supplemented on September 9, 2016.

¹³ See *Luning Energy Holdings LLC, et al.* Letter Order, Docket Nos. ER16-2411-001, *et al.* (Sept. 27, 2016) as corrected by a letter order issued on October 4, 2016.

¹⁴ See *Cal. Pac. Electric Co., LLC*, Docket No. ER10-1703, Letter Order dated August 20, 2010.

also provides borderline services to Sierra Pacific pursuant to a long-term contract with an initial term effective January 1, 2011 through December 31, 2016 with automatic renewal terms of five years. Thus, the current term of the borderline agreement commenced January 1, 2016 through December 31, 2021 and the parties anticipate indefinite renewals. The Commission has disclaimed jurisdiction over CalPeco's distribution system.¹⁵

In addition, the Commission recently approved Liberty Utilities (Central) Co.'s acquisition of The Empire District Electric Company ("Empire").¹⁶ While the transaction has not yet been consummated, Empire is treated as an affiliate for purposes of this Application.

Empire is a small investor-owned utility providing electric service to approximately 169,000 customers in Southwest Missouri, southeast Kansas, northeast Oklahoma and northwest Arkansas. Empire is a public utility company regulated by the Missouri Public Service Commission, the Kansas Corporation Commission, the Oklahoma Corporation Commission, the Arkansas Public Service Commission and the Commission. Empire is a transmission-owning member of the Southwest Power Pool, Inc. ("SPP"). All requests for transmission service on Empire's transmission system are made through SPP under the terms and conditions of the SPP Tariff. Empire has market-based rate authority.¹⁷ Empire also provides service to its customers under cost-based rate schedules on file with the Commission.

¹⁵ See *Cal. Pac. Electric Co., LLC*, 133 FERC P 61,018 (2010).

¹⁶ *The Empire District Electric Company and Liberty Utilities (Central) Co.*, 155 FERC ¶ 62,091 (May 6, 2016).

¹⁷ *The Empire District Electric Company*, 116 FERC ¶ 61,150 (2006), *order denying reh'g*, 123 FERC ¶ 61,084 (2008). See also *The Empire District Electric Company*, Docket No. ER10-2738-003, Letter Order dated Nov. 17, 2015 (accepting for filing Empire's updated market power analysis for filing); *The Empire District Electric Company*, Letter Order, Docket No. ER14-793-001 dated Mar. 13, 2014 (accepting Empire's notice of change in status filing and proposed tariff changes to remove tariff provisions limiting Empire's market-based rate authority in the SPP market in anticipation of the start of the SPP Integrated Market).

Empire sells wholesale power only within or at the border of the SPP BAA. Empire owns generating capacity located within the SPP BAA¹⁸ and MISO BAA.¹⁹ Empire's capacity is utilized to meet its load serving obligations. Excess energy not needed to satisfy its load is sold into the SPP market.

Empire directly owns The Empire District Gas Company ("Empire Gas"), a local distribution company that provides service to approximately 42,230 gas customers in western Missouri. Empire Gas is not regulated as a "natural gas company" pursuant to section 1(b) or 1(c) of the Natural Gas Act.

Other than those entities described above, Applicant has no other affiliates located in CAISO or any first tier market. Neither Applicant nor any of its affiliates has a franchised electric utility service area in the Southwest Region. As required by the Commission's regulations, an Asset Appendix listing all required energy affiliates of Applicant is included as Exhibit B.

III. REQUEST FOR BLANKET AUTHORIZATION TO MAKE WHOLESALE SALES OF ELECTRIC ENERGY, CAPACITY, AND ANCILLARY SERVICES AT MARKET-BASED RATES

Applicant seeks authorization to sell electric energy, capacity, and ancillary services at market-based rates pursuant to its Market-Based Rate Tariff. The Commission permits sales

¹⁸ Empire's generation in the SPP BAA includes: Asbury, a 191 MW coal-fired facility located in Missouri; Empire Energy Center, a 267 MW natural gas facility located in Missouri; Iatan, a 192 MW coal-fired facility located in Missouri (capacity reflects Empire's allocated 12% share of this facility); Ozark Beach, a 16 MW hydro facility located in Missouri; Riverton, a 248 MW natural gas facility located in Kansas; State Line 1, a 96 MW natural gas facility located in Missouri; State Line Combined Cycle, a 297 MW natural gas facility located in Missouri (capacity reflects Empire's allocated 60% share of this facility); Elk River Windfarm LLC, located in the SPP BAA, Empire purchases 150 MW under a long-term power purchase agreement; and Cloud County Windfarm LLC, located in the SPP BAA, Empire purchases 105 MW under a long term power purchase agreement.

¹⁹ Empire's generation in the MISO BAA includes: Plum Point Energy Station, a coal fired facility in the MISO-South region from which Empire receives 50 MW; and a long term purchase agreement from the Plum Point Energy Station for an additional 50 MW from the facility.

for resale at market-based rates if the seller and its affiliates do not have, or have adequately mitigated, vertical and horizontal market power in generation and transmission and cannot erect other barriers to entry.²⁰ Applicant meets each of the Commission’s requirements for authorization to make wholesale sales of electric energy, capacity, and ancillary services at market-based rates.

A. APPLICANT LACKS GENERATION MARKET POWER

The Commission has adopted two indicative screens for generation market power – a “pivotal supplier” screen and a “wholesale market share” screen. The pivotal supplier screen evaluates the potential of a seller and its affiliates to exercise market power based on uncommitted capacity at the time of the market’s peak demand. The wholesale market share screen measures whether a seller and its affiliates have a dominant position in the market for each of the four seasons based on the number of megawatts owned or controlled by the seller and its affiliates as compared to uncommitted capacity of the entire market. If an entity fails either of these two screens, there is a presumption that Applicant possesses horizontal market power and further analysis is required.

As noted above, Sanger’s Facility has a nameplate rating of 60 MW. The Facility is committed to a third party, PG&E, under a long term firm power purchase agreement for 45-47 MW. As such, the amount of Sanger’s uncommitted capacity in the CAISO market will be limited to 13-15 MW for the term of the agreement. The generation capacity of Sanger’s affiliates (SKIC 10 and SKIC 20) in CAISO is fully committed under long-term power purchase agreements with unaffiliated parties.

²⁰ *Market-Based Rates For Wholesale Sales Of Electric Energy, Capacity And Ancillary Services By Public Utilities*, Order No. 697, 119 FERC ¶ 61,295 (2007).

With respect to first tier markets, the capacity owned by Luning is fully committed under long-term power contract to Calpeco. Even assuming that all capacity in CAISO and the first tier market is uncommitted, Sanger easily passes the Commission's indicative market screens.²¹ The pivotal supplier analysis shows that Sanger, its affiliates in CAISO and in first tier markets pass the screen with only 0.9% of net uncommitted supply (using conservative simplifying assumptions). The market share analysis shows that Sanger and its affiliates in CAISO and first tier markets have a market share in the CAISO BAA of no greater than 0.2% in any season. Accordingly, Applicant and its affiliates lack horizontal market power.

B. APPLICANT LACKS VERTICAL MARKET POWER

1. Applicant Lacks Transmission Market Power

The only facilities owned by the Applicant are interconnection facilities necessary to bring the power from the Facility to the interconnection point. Ownership of limited facilities does not confer on Applicant transmission market power.²² Sanger confirms that Sanger and its affiliates qualify for the waiver granted in Order No. 807 (see also 18 C.F.R. § 35.28(d)(2)) that is applicable to any public utility that is or becomes subject to OATT requirements because it owns, controls or operates only Interconnection Customer Interconnection Facilities (ICIF). While Empire owns transmission facilities in SPP, those facilities are under the operational control of SPP and all transmission requests are made and awarded via the

²¹ Data for the CAISO BAA for the period from Dec. 2013-Nov. 2014 is based on the market power analysis accepted by the Commission on May 4, 2016 in *Wheelabrator Shasta Energy Co., Inc., et al.*, Docket No. ER10-3232-004 (ECP Triennial Supplement filed on Jan. 27, 2016). Applicant submits that there would be no significant increase in Applicant's market shares during any season if more recent data had been used.

²² See, e.g., *Eastern Desert Power, LLC, et al.*, 114 FERC ¶ 61,340 (2006). See also *Open Access and Priority Rights on Interconnection Customer's Interconnection Facilities*, Order No. 807, 150 FERC ¶ 61,211 at P.167 (2015) (the standards for automatic waiver of the obligation to file an OATT under § 35.28(d)(2) of the Commission's regulations are satisfied here).

SPP Tariff. With respect to CalPeco, the Commission has disclaimed jurisdiction over its distribution system and, in any event, it cannot be used to exert vertical market power.²³

Thus, Applicant lacks vertical market power.

2. **Applicant Cannot Erect Other Barriers to Entry**

Applicant does not own or control any sites for the construction of new generating capacity in CAISO;²⁴ intrastate natural gas transportation, storage or distribution facilities in CAISO, physical coal supply sources or facilities for the transportation of coal supplies; or other essential resources or inputs to power production that could be used to erect barriers to entry. Applicant's affiliates own interests in intrastate natural gas facilities and certain natural gas distribution facilities, but none of those facilities can be used to erect barriers to entry.

Applicant's affiliate, **Liberty Utilities (Peach State Natural Gas) Corp.** ("Peach State"), owns 70 miles of intrastate natural gas lines in Barrow, Chattahoochee, Hall, Harris, Jackson, Muscogee and Oconee, Georgia. These facilities are distribution only and used to serve the retail distribution customers of Peach State in Georgia. Peach State is regulated by the Georgia Public Service Commission.

Liberty Utilities (MidStates Natural Gas) Corp. ("Liberty MidStates") is a regulated natural gas utility serving approximately 84,000 customers in Illinois, Iowa and Missouri (57,000 customers in Missouri, 23,000 customers in Illinois and 4,000 customers in Iowa). Liberty MidStates has a Section 284.224 Limited Jurisdiction Blanket Certificate and Statement of Operation Conditions on file with the Commission.²⁵ Liberty MidStates uses its

²³ *California Pacific Electric Company, LLC*, 133 FERC ¶ 61,018 (2010).

²⁴ In Order No. 816, the Commission revised section 35.37(e)(2) of the regulations to remove the requirement that sellers provide information regarding sites for generation capacity development to demonstrate a lack of vertical market power. Order No. 816 at P 212.

²⁵ Liberty Midstates' intrastate pipeline facilities include:

facilities to serve its retail customers and serve other customers seeking intrastate service pursuant to its Limited Jurisdiction Blanket Certificate and Statement of Operation Conditions on file with the Commission. Liberty MidStates is regulated by the Public Utilities Commissions of Illinois, Iowa and Missouri. None of these facilities can be used to erect barriers to entry because they are used to serve retail customers or are otherwise available to provide service under its blanket certificate authority.

Liberty Utilities (EnergyNorth Natural Gas) Corp. (“EnergyNorth”) is a natural gas utility providing retail natural gas service (sales and distribution) to over 86,000 customers in five counties and 30 communities in New Hampshire. EnergyNorth’s franchise territory includes southern and central New Hampshire, and Berlin, New Hampshire and covers approximately 1,001 square miles.²⁶ In connection with its retail services, EnergyNorth holds interstate natural gas transportation and storage capacity on a number of interstate pipelines. EnergyNorth also operates a propane air service company regulated by the New Hampshire Public Utilities Commission serving retail propane air service to approximately 1,200 customers in and around Keene, New Hampshire. These facilities are distribution only and used to serve the retail distribution customers of EnergyNorth. EnergyNorth is regulated by the New Hampshire Public Utilities Commission.

Liberty Utilities (New England Natural Gas Company) Corp. (“Liberty New England”) is a regulated natural gas utility providing natural gas service to approximately

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- Eight miles of four-inch line in Illinois;
 - Twelve miles of four-inch, eleven miles of six-inch, two miles of eight-inch and sixteen miles of ten-inch pipe in Iowa; and
 - One hundred thirty (130) miles of six-inch, seventeen miles of eight-inch and forty-seven miles of ten-inch pipe in Missouri.

²⁶ EnergyNorth’s distribution system includes approximately 2,140 miles of distribution pipelines, 2.8 miles of transmission-pressure mains, and eight city gates.

53,000 customers in Massachusetts. Liberty New England has no intrastate transmission. These facilities are distribution only and used to serve the retail distribution customers of Liberty New England. Liberty New England is regulated by the Massachusetts Department of Public Utilities.

Empire Gas is a local distribution company that provides service to approximately 42,230 gas customers in western Missouri. Empire Gas is not regulated as a “natural gas company” pursuant to section 1(b) or 1(c) of the Natural Gas Act. There is no geographic overlap between the natural gas assets owned by the APUC affiliates and Empire Gas and none of the natural gas assets serve electric generating facilities. Thus, Sanger does not have the ability to erect barriers to entry to the wholesale power markets or to otherwise restrict market entry by competing power suppliers.

Finally, all jurisdictional electric transmission assets owned or controlled by Empire in SPP are subject to the SPP OATT on file with the Commission. Sanger further affirms that it has not and will not erect barriers to entry into the wholesale power markets.²⁷

Applicant does not have the ability to erect barriers to entry to the wholesale power markets or to otherwise restrict market entry by competing power suppliers. Neither Applicant nor any of its affiliates has erected barriers to entry into the relevant market and will not erect barriers to entry into the relevant market. Accordingly, Applicant satisfies the Commission’s standards with regard to vertical market power.

IV. JURISDICTIONAL SERVICES TO BE PROVIDED PURSUANT TO APPLICANT’S MARKET BASED RATE AUTHORITY

Sanger proposes to sell electric energy and capacity at market-based rates pursuant to the terms and conditions of its Tariff. Applicant also requests authorization to sell the

²⁷ Order No. 697, FERC Stats. & Regs. ¶ 31,252 at P 447. *See also*, 18 C.F.R. § 35.37(e)(4).

ancillary services the Commission has authorized utilities with market-based rate authority to sell in the markets administered by a Regional Transmission Organization or Independent System Operator. As required by Appendix C of Order No. 697, Applicant has listed in the Tariff the specific ancillary services it may sell in these markets.

V. REQUEST FOR CATEGORY 1 STATUS IN EACH OF THE CENTRAL, NORTHEAST, NORTHWEST, SOUTHEAST, SOUTHWEST AND SOUTHWEST POWER POOL REGIONS

Section 35.36(a)(2) of the Commission's regulations define a Category 1 Seller as wholesale power marketers and wholesale producers that: (i) own or control 500 MW or less of generation in aggregate in the relevant region; (ii) do not own, operate or control transmission facilities other than limited equipment necessary to connect individual generating facilities to the transmission grid; (iii) are not affiliated with anyone that owns, operates or controls transmission facilities in the same region as the seller's generation assets; (iv) are not affiliated with a franchised public utility in the same region as the seller's generation assets; and (v) do not raise other vertical market power issues.²⁸

Sanger will own or control generation capacity in the CAISO BAA totaling 60 MW and, when combined with its affiliate's 30 MW generation capacity in the CAISO BAA, Sanger will not trigger the 500 MW threshold for a Category 1 seller. Sanger is not an affiliate of a franchised public utility in the Southwest region. Calpeco is located in the Northwest region, but in accordance with Order No. 816, Sanger qualifies as a Category 1 Seller in the Northwest region.²⁹ Sanger does not own or control transmission facilities in any region other than limited interconnection facilities necessary to connect its individual generation facilities to the transmission grid as discussed above. Sanger's application and the

²⁸ 18 C.F.R. § 35.36(a)(2).

²⁹ Order No. 816 at P 317.

authorization it seeks do not raise any other vertical market power issues. Thus, Sanger meets the requirements of a Category 1 Seller and seeks such a designation from the Commission in accordance with Section 35.36(a) in all regions.

VI. REQUEST FOR WAIVERS AND BLANKET AUTHORIZATIONS

Sanger requests that the Commission grant the following waivers and authorizations consistent with those granted to other market-based rate applicants.

- Waiver of Subparts B and C of Part 35 of the Commission's regulations regarding the filing of rate schedules, except Sections 35.12(a), 35.13(b), 35.15 and 35.16;
- Waiver of the accounting and related reporting requirements under Parts 41, 101 and 141 of the Commission's regulations, with the exception of 18 C.F.R. §§ 141.14 and 141.15;
- Blanket authorization under Section 204 of the FPA, 16 U.S.C. § 824c, and Part 34 of the Commission's regulations to issue securities and assume obligations and liability; and
- Any other appropriate waivers and authorizations that may be necessary for Applicant's Tariff to be made effective as requested in this Application.

Sanger requests that the Commission grant all waivers necessary to permit the Tariff to become effective on January 1, 2017.

VII. REPORTING REQUIREMENTS

As required by Order No. 2001,³⁰ Sanger will timely file Electric Quarterly Reports. In accordance with the Commission Order No. 652,³¹ Sanger will also notify the Commission within thirty (30) days after any change in status that would reflect a departure from the characteristics relied upon by the Commission in its evaluation of Sanger's application for market-based rate authority. In accordance with the Commission's Market Behavior Rules,

³⁰ *Revised Public. Utility. Filing Requirements*, Order No. 2001, 67 Fed. Reg. 31043, FERC Stats. & Regs. ¶ 31,127 (April 25, 2002), *reh'g denied*, Order No. 2001-A, 100 FERC ¶ 61,074, *reconsideration and clarification denied*, Order No. 2001-B, 100 FERC ¶61,342, *order directing filings*, Order No. 2001-C, 101 FERC ¶ 61,314 (2002).

³¹ *Reporting Requirements for Changes in Status for Pub. Utils. with Market-Based Rates Auth.*, Order No. 652, FERC Stats. & Regs. ¶ 31,175, *order on reh'g*, 111 FERC ¶ 61,413 (2005).

and Section 35.41(c) of the Commission's regulations, Sanger hereby notifies the Commission that, as of the effective date of the Tariff, it will not report transactions to publishers of electricity or natural gas price indices. If, at any point, Sanger begins to report price data to index publishers, Sanger will notify the Commission within fifteen (15) days.

VIII. MATERIALS SUBMITTED WITH THIS FILING

Applicant hereby includes the following exhibits as part of this filing:

- Exhibit A – Market Based Rate Tariff
- Exhibit B – Asset Appendix
- Exhibit C – Pivotal Supplier Assessment – CAISO
- Exhibit D – Wholesale Market Share Assessment – CAISO

IX. CONCLUSION

Sanger respectfully requests that the Commission issue an order: (i) accepting the Tariff for filing; (ii) granting blanket authorization for Applicant to make wholesale sales of electric energy, capacity, and ancillary services at market-based rates pursuant to the Tariff; (iii) accepting Applicant's designation as a Category 1 Seller in all regions; (iv) granting such other waivers and authorizations as are routinely granted to other market-based rate sellers, including blanket approval under 18 C.F.R. Part 34 of all future issuances of securities and assumptions of liabilities; and (v) granting waiver of the prior notice requirement to allow the Tariff to become effective on January 1, 2017.

Respectfully submitted,

/s/ Linda L. Walsh

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Dated: December 28, 2016

Exhibit A

ALGONQUIN POWER SANGER LLC FERC ELECTRIC TARIFF

1) Availability

Seller makes electric energy, capacity, and ancillary services available under this Tariff to any purchaser for resale, except as prohibited below.

2) Rates

All sales shall be made at rates established by agreement between the purchaser and Seller.

3) Other Terms and Conditions

All other terms and conditions for sales under this Tariff shall be established by agreement between Seller and purchaser.

4) Seller Category

Seller is a Category 1 seller in all regions as defined in 18 CFR 35.36(a).

5) Compliance with Commission Regulations

Seller shall comply with the provisions of 18 CFR Part 35, Subpart H, as applicable, and with any conditions the Commission imposes in its orders concerning seller's market-based rate authority, including orders in which the Commission authorizes seller to engage in affiliate sales under this Tariff or otherwise restricts or limits the seller's market-based rate authority. Failure to comply with the applicable provisions of 18 CFR Part 35, Subpart H, and with any orders of the Commission concerning seller's market-based rate authority, will constitute a violation of this Tariff.

6) Limitations and Exemptions Regarding Market-Based Rate Authority

Seller has received waiver of: Subparts B and C of Part 35, except for sections 35.12(a), 35.13(b), 35.15 and 35.16; Part 41, Part 101 (with the exception that waiver of the provisions of Part 101 that apply to hydropower licenses is not granted with respect to licensed hydropower projects), and Part 141, except sections 141.14 and 141.15.; and received blanket approval under Part 34. *Algonquin Power Sanger LLC*, ER17-____-000 (2017).

7) Ancillary Services

PJM: Seller offers regulation and frequency response service, energy imbalance service, and operating reserve service (which includes spinning, 10-minute, and 30-minute reserves) for sale into the market administered by PJM Interconnection, L.L.C. ("PJM") and, where the

PJM Open Access Transmission Tariff permits, the self-supply of these services to purchasers for a bilateral sale that is used to satisfy the ancillary services requirements of the PJM Office of Interconnection.

New York: Seller offers regulation and frequency response service, and operating reserve service (which include 10-minute non-synchronous, 30-minute operating reserves, 10-minute spinning reserves, and 10-minute non-spinning reserves) for sale to purchasers in the market administered by the New York Independent System Operator, Inc.

New England: Seller offers regulation and frequency response service (automatic generator control), operating reserve service (which includes 10-minute spinning reserve, 10-minute non-spinning reserve, and 30-minute operating reserve service) to purchasers within the markets administered by the ISO New England, Inc.

California: Seller offers regulation service, spinning reserve service, and non-spinning reserve service to the California Independent System Operator Corporation ("CAISO") and to others that are self-supplying ancillary services to the CAISO.

MISO: Seller offers regulation service and operating reserve service (which include 10-minute spinning reserve and 10-minute supplemental reserve) for sale to the Midcontinent Independent System Operator, Inc. (MISO) and to others that are self-supplying ancillary services to MISO.

Southwest Power Pool: Seller offers regulation service and operating reserve service (which include 10-minute spinning reserve and 10-minute supplemental reserve) for sale to the Southwest Power Pool, Inc. (SPP) and to others that are self-supplying ancillary services to SPP.

Third-party ancillary services: Seller offers Regulation and Frequency Response Service, Reactive Supply and Voltage Control Service, Energy and Generator Imbalance Service, Operating Reserve-Spinning, and Operating Reserve-Supplemental. Sales will not include the following: (1) sales to an RTO or an ISO, i.e., where that entity has no ability to self-supply ancillary services but instead depends on third parties; and (2) sales to a traditional, franchised public utility affiliated with the third-party supplier, or sales where the underlying transmission service is on the system of the public utility affiliated with the third-party supplier. Sales of Operating Reserve-Spinning and Operating Reserve-Supplemental will not include sales to a public utility that is purchasing ancillary services to satisfy its own open access transmission tariff requirements to offer ancillary services to its own customers, except where the Commission has granted authorization. Sales of Regulation and Frequency Response Service and Reactive Supply and Voltage Control Service will not include sales to a public utility that is purchasing ancillary services to satisfy its own open access transmission tariff requirements to offer ancillary services to its own customers, except at rates not to exceed the buying public utility transmission provider's OATT rate for the same service or where the Commission has granted authorization.

8) Revisions

Seller may file revisions of this Tariff with the Commission. Nothing contained in this Tariff shall be construed as affecting or limiting in any way the right of Seller to unilaterally file with the Commission for a change in any aspect of this Tariff under Section 205 of the Federal Power Act pursuant to the Commission's Rules and Regulations.

9) Effective Date

This Tariff shall become effective on the date specified by the Commission.

Exhibit B- Asset Appendix

Exhibit C – Pivotal Supplier Assessment – CAISO

Appendix A: Standard Screen Format (Data provided for illustrative purposes only)**Part I – Pivotal Supplier Analysis****Staff Notes:**

The file differs from the file published in the NOPR:

1. All entered values must be positive (no parenthesis/negative numbers)
2. The formulas (and the text in the row description) have been changed to reflect number 1.
3. The text in row 13 "Date of Filing" has been replaced with "Data Year"
4. Instruction: *Enter all numeric values as positive numbers (blue values)*

Don't enter values into an outlined cell (black values)

Applicant-> **Algonquin Power Sanger LLC**
 Market -> **CAISO BAA**
 Data Year -> **Dec 2013-Nov 2014**

Row

Generation		Reference
Seller and Affiliate Capacity (owned or controlled)		
A	Installed Capacity (from inside the study area)	90
A1	Remote Capacity (from outside the study area)	0
B	Long-Term Firm Purchases (from inside the study area)	0
B1	Long-Term Firm Purchases (from outside the study area)	0
C	Long-Term Firm Sales (in and outside the study area)	-
D	Uncommitted Capacity Imports	62
Non-Affiliate Capacity (owned or controlled)		
E	Installed Capacity (from inside the study area)	59,067
E1	Remote Capacity (from outside the study area)	4,846
F	Long-Term Firm Purchases (from inside the study area)	0
F1	Long-Term Firm Purchases (from outside the study area)	-
G	Long-Term Firm Sales (in and outside the study area)	-
H	Uncommitted Capacity Imports	0
I	Study Area Reserve Requirement	2,238
J	Amount of Line I Attributable to Seller, if any	-
K	Total Uncommitted Supply (A+A1+B+B1+D+E+E1+F+F1+H-C-G-I-M)	24,521
Load		
L	Balancing Authority Area Annual Peak Load	44,694
M	Average Daily Peak Native Load in Peak Month	37,306
N	Amount of Line M Attributable to Seller, if any	0
O	Wholesale Load (L-M)	7,388
P	Net Uncommitted Supply (K-O)	17,133
Q	Seller's Uncommitted Capacity (A+A1+B+B1+D-C-J-N)	152
	Result of Pivotal Supplier Screen (Pass if Line Q < Line P) (Fail if Line Q > Line P)	Pass
	Result of Pivotal Supplier Screen w/o Competing Imports	Pass
	Total Imports (Sum D,H), as filed by Seller ->	62
	% of SIL for Seller's imported capacity ->	1.00
	% of SIL for Other's imported capacity ->	0.00
	SIL value* ->	-
	Do Total Imports exceed the SIL value? ->	Yes

* Transmission owners filing triennials should use the SIL values from their Submittal 1, Row 10 (see *Puget Sound Energy, Inc.*, 135 FERC ¶ 61,254 (2011)). Other sellers should use Commission-accepted SIL values, if they exist for the study area and study period. If these values do not exist, sellers should use SIL values that have been filed but not accepted.

Exhibit D – Wholesale Market Share Assessment – CAISO

Appendix A: Standard Screen Format (Data provided for illustrative purposes only)
Part II – Market Share Analysis
Staff Notes:

The file differs from the file published in the NOPR:

1. All entered values must be positive (no parenthesis/negative numbers)
2. The formulas (and the text in the row description) have been changed to reflect number 1.
3. Instruction: *Enter all numeric values as positive numbers (blue values)*

<i>Don't enter values into an outlined cell (black values)</i>
--

		As filed by the Applicant/Seller				
		Winter	Spring	Summer	Fall	
		(MW)	(MW)	(MW)	(MW)	
Row						Reference
Seller and Affiliate Capacity (owned, controlled or under LT contract)						
A	Installed Capacity (inside the study area)	90	90	90	90	
A1	Remote Capacity (from outside the study area)	0	0	0	0	
B	Long-Term Firm Purchases (inside the study area)	0	0	0	0	
B1	Long-Term Firm Purchases (from outside the study area)	0	0	0	0	
C	Long-Term Firm Sales (in and outside the study area)	90	90	90	90	
D	Seasonal Average Planned Outages	0	0	0	0	
E	Uncommitted Capacity Imports	62	62	62	62	
Capacity Deductions						
F	Average Peak Native Load in the Season	29,008	29,123	36,707	32,667	ECP Triennial
G	Amount of Line F Attributable to Seller, if any	0	0	0	0	
H	Amount of Line F Attributable to Non-Affiliates, if any	29,008	29,123	36,707	32,667	
I	Study Area Reserve Requirement	1,740	1,747	2,202	1,960	ECP Triennial
J	Amount of Line I Attributable to Seller, if any	0	0	0	0	
K	Amount of Line I Attributable to Non-Affiliates, if any	1,740	1,747	2,202	1,960	
Non-Affiliate Capacity (owned, controlled or under LT contract)						
L	Installed Capacity (inside the study area)	62,194	61,741	62,073	62,388	ECP Triennial, minus row A
L1	Remote Capacity (from outside the study area)	4,847	4,846	4,846	4,846	ECP Triennial
M	Long-Term Firm Purchases (inside the study area)	0	0	0	0	
M1	Long-Term Firm Purchases (from outside the study area)	0	0	0	0	
N	Long-Term Firm Sales (in and outside the study area)	0	0	0	0	
O	Seasonal Average Planned Outages	4,260	6,672	1,739	6,043	ECP Triennial
P	Uncommitted Capacity Imports	0	0	0	0	Conservative assumption
Supply Calculation						
Q	Total Competing Supply (L+L1+M+M1+P-H-K-N-O)	32,033	29,045	26,271	26,564	
R	Seller's Uncommitted Capacity (A+A1+B+B1+E-C-D-G-J)	62	62	62	62	
S	Total Seasonal Uncommitted Capacity (Q+R)	32,095	29,107	26,333	26,626	
T	Seller's Market Share (R:S)	0.2%	0.2%	0.2%	0.2%	
	Results (Pass if < 20% and Fail if ≥ 20%)	Pass	Pass	Pass	Pass	
U	Total Imports, as filed by Seller (E+P)	62	62	62	62	
V	SIL value*	-	-	-	-	
	Do Total Imports exceed SIL value? (is U<=V)	Yes	Yes	Yes	Yes	
	Seller's Market Share w/o Competing Imports	0.2%	0.2%	0.2%	0.2%	
		Pass	Pass	Pass	Pass	

*Transmission owners filing triennials should use the SIL values from their Submittal 1, Row 10 (see *Puget Sound Energy, Inc.*, 135 FERC ¶ 61,254 (2011)). Other sellers should use Commission-accepted SIL values, if they exist for the study area and study period. If these values do not exist, sellers should use SIL values that have been filed but not accepted.

Exhibit A

ALGONQUIN POWER SANGER LLC FERC ELECTRIC TARIFF

1) Availability

Seller makes electric energy, capacity, and ancillary services available under this Tariff to any purchaser for resale, except as prohibited below.

2) Rates

All sales shall be made at rates established by agreement between the purchaser and Seller.

3) Other Terms and Conditions

All other terms and conditions for sales under this Tariff shall be established by agreement between Seller and purchaser.

4) Seller Category

Seller is a Category 1 seller in all regions as defined in 18 CFR 35.36(a).

5) Compliance with Commission Regulations

Seller shall comply with the provisions of 18 CFR Part 35, Subpart H, as applicable, and with any conditions the Commission imposes in its orders concerning seller's market-based rate authority, including orders in which the Commission authorizes seller to engage in affiliate sales under this Tariff or otherwise restricts or limits the seller's market-based rate authority. Failure to comply with the applicable provisions of 18 CFR Part 35, Subpart H, and with any orders of the Commission concerning seller's market-based rate authority, will constitute a violation of this Tariff.

6) Limitations and Exemptions Regarding Market-Based Rate Authority

Seller has received waiver of: Subparts B and C of Part 35, except for sections 35.12(a), 35.13(b), 35.15 and 35.16; Part 41, Part 101 (with the exception that waiver of the provisions of Part 101 that apply to hydropower licenses is not granted with respect to licensed hydropower projects), and Part 141, except sections 141.14 and 141.15.; and received blanket approval under Part 34. *Algonquin Power Sanger LLC*, ER17-____-000 (2017).

7) Ancillary Services

PJM: Seller offers regulation and frequency response service, energy imbalance service, and operating reserve service (which includes spinning, 10-minute, and 30-minute reserves) for sale into the market administered by PJM Interconnection, L.L.C. ("PJM") and, where the PJM Open

Access Transmission Tariff permits, the self-supply of these services to purchasers for a bilateral sale that is used to satisfy the ancillary services requirements of the PJM Office of Interconnection.

New York: Seller offers regulation and frequency response service, and operating reserve service (which include 10-minute non-synchronous, 30-minute operating reserves, 10-minute spinning reserves, and 10-minute non-spinning reserves) for sale to purchasers in the market administered by the New York Independent System Operator, Inc.

New England: Seller offers regulation and frequency response service (automatic generator control), operating reserve service (which includes 10-minute spinning reserve, 10-minute non-spinning reserve, and 30-minute operating reserve service) to purchasers within the markets administered by the ISO New England, Inc.

California: Seller offers regulation service, spinning reserve service, and non-spinning reserve service to the California Independent System Operator Corporation ("CAISO") and to others that are self-supplying ancillary services to the CAISO.

MISO: Seller offers regulation service and operating reserve service (which include 10-minute spinning reserve and 10-minute supplemental reserve) for sale to the Midcontinent Independent System Operator, Inc. (MISO) and to others that are self-supplying ancillary services to MISO.

Southwest Power Pool: Seller offers regulation service and operating reserve service (which include 10-minute spinning reserve and 10-minute supplemental reserve) for sale to the Southwest Power Pool, Inc. (SPP) and to others that are self-supplying ancillary services to SPP.

Third-party ancillary services: Seller offers Regulation and Frequency Response Service, Reactive Supply and Voltage Control Service, Energy and Generator Imbalance Service, Operating Reserve-Spinning, and Operating Reserve-Supplemental. Sales will not include the following: (1) sales to an RTO or an ISO, i.e., where that entity has no ability to self-supply ancillary services but instead depends on third parties; and (2) sales to a traditional, franchised public utility affiliated with the third-party supplier, or sales where the underlying transmission service is on the system of the public utility affiliated with the third-party supplier. Sales of Operating Reserve-Spinning and Operating Reserve-Supplemental will not include sales to a public utility that is purchasing ancillary services to satisfy its own open access transmission tariff requirements to offer ancillary services to its own customers, except where the Commission has granted authorization. Sales of Regulation and Frequency Response Service and Reactive Supply and Voltage Control Service will not include sales to a public utility that is purchasing ancillary services to satisfy its own open access transmission tariff requirements to offer ancillary services to its own customers, except at rates not to exceed the buying public utility transmission provider's OATT rate for the same service or where the Commission has granted authorization.

8) Revisions

Seller may file revisions of this Tariff with the Commission. Nothing contained in this Tariff shall be construed as affecting or limiting in any way the right of Seller to unilaterally file with the Commission for a change in any aspect of this Tariff under Section 205 of the Federal Power Act pursuant to the Commission's Rules and Regulations.

9) Effective Date

This Tariff shall become effective on the date specified by the Commission.

FERC rendition of the electronically filed tariff records in Docket No. ER17-00692-000
Filing Data:
CID: C005527
Filing Title: Application for Market Based Rate
Company Filing Identifier: 775
Type of Filing Code: 390
Associated Filing Identifier:
Tariff Title: Market Based Rate Tariff
Tariff ID: 1033
Payment Confirmation:
Suspension Motion:

Tariff Record Data:
Record Content Description, Tariff Record Title, Record Version Number, Option Code:
FERC Electric Tariff, Market Based Rate, 0.0.0, A
Record Narrative Name:
Tariff Record ID: 1
Tariff Record Collation Value: 1000000 Tariff Record Parent Identifier: 0
Proposed Date: 2017-01-01
Priority Order: 500
Record Change Type: NEW
Record Content Type: 1
Associated Filing Identifier:

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MISO: Seller offers regulation service and operating reserve service (which include 10-minute spinning reserve and 10-minute supplemental reserve) for sale to the Midcontinent Independent System Operator, Inc. (MISO) and to others that are self-supplying ancillary services to MISO.

Southwest Power Pool: Seller offers regulation service and operating reserve service (which include 10-minute spinning reserve and 10-minute supplemental reserve) for sale to the Southwest Power Pool, Inc. (SPP) and to others that are self-supplying ancillary services to SPP.

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following: (1) sales to an RTO or an ISO, i.e., where that entity has no ability to self-supply ancillary services but instead depends on third parties; and (2) sales to a traditional, franchised public utility affiliated with the third-party supplier, or sales where the underlying transmission service is on the system of the public utility affiliated with the third-party supplier. Sales of Operating Reserve-Spinning and Operating Reserve-Supplemental will not include sales to a public utility that is purchasing ancillary services to satisfy its own open access transmission tariff requirements to offer ancillary services to its own customers, except where the Commission has granted authorization. Sales of Regulation and Frequency Response Service and Reactive Supply and Voltage Control Service will not include sales to a public utility that is purchasing ancillary services to satisfy its own open access transmission tariff requirements to offer ancillary services to its own customers, except at rates not to exceed the buying public utility transmission provider's OATT rate for the same service or where the Commission has granted authorization.

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9) Effective Date

This Tariff shall become effective on the date specified by the Commission.

Energy Affiliates of Applicant
Asset Appendix: Generation Assets

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[A]	[B]	[C]	[D]	[E]	[F]	[G]	[H]	[I]	[J]	[K]	[L]	[M]
Filing Entity and its Energy Affiliates	Docket # where MBR authority was granted	Generation Name (Plant or Unit Name)	Owned By	Controlled By	Date Control Transferred	Location		In-Service Date	Capacity Rating: Nameplate (MW)	Capacity Rating: Used in Filing (MW)	Capacity Rating: Methodology Used in [K]: (N)Nameplate, (S)Seasonal, 5-yr (E)JA, (A)Alternative	End Note Number (Enter text in End Note Tab)
						Market / Balancing Authority Area	Geographic Region					
The Empire District Electric Company	ER99-1757	Riverton- Unit 12	The Empire District Electric Company	The Empire District Electric Company	N/A	SPP	SPP	May-2007	148.8	255 (s)/ 285 (w)	S	12
The Empire District Electric Company	ER99-1757	Riverton- Unit 9	The Empire District Electric Company	The Empire District Electric Company	N/A	SPP	SPP	Jun-1964	12.5	12	S	1
The Empire District Electric Company	ER99-1757	Riverton - Unit 8	The Empire District Electric Company	The Empire District Electric Company	N/A	SPP	SPP	Jun-1954	50	54	S	2
The Empire District Electric Company	ER99-1757	Riverton- Unit 10	The Empire District Electric Company	The Empire District Electric Company	N/A	SPP	SPP	Nov-1988	16.3	16 (s)/ 17 (w)	S	
The Empire District Electric Company	ER99-1757	Riverton- Unit 11	The Empire District Electric Company	The Empire District Electric Company	N/A	SPP	SPP	Dec-1988	16.3	17	S	
The Empire District Electric Company	ER99-1757	Asbury	The Empire District Electric Company	The Empire District Electric Company	N/A	SPP	SPP	Jun-1970	212.8	195	S	
The Empire District Electric Company	ER99-1757	Empire Energy Center- Unit 2	The Empire District Electric Company	The Empire District Electric Company	N/A	SPP	SPP	Jun-1981	129	82 (s)/ 86 (w)	S	
The Empire District Electric Company	ER99-1757	Empire Energy Center- Unit 3	The Empire District Electric Company	The Empire District Electric Company	N/A	SPP	SPP	Apr-2003	60.5	49 (s)/ 60 (w)	S	
The Empire District Electric Company	ER99-1757	Empire Energy Center- Unit 4	The Empire District Electric Company	The Empire District Electric Company	N/A	SPP	SPP	Apr-2003	60.5	49 (s)/ 60 (w)	S	
The Empire District Electric Company	ER99-1757	Empire Energy Center- Unit 1	The Empire District Electric Company	The Empire District Electric Company	N/A	SPP	SPP	Mar-1978	129	85 (s)/ 86 (w)	S	
The Empire District Electric Company	ER99-1757	Ozark Beach- Unit 6	The Empire District Electric Company	The Empire District Electric Company	N/A	SPP	SPP	Jun-1931	4	4	S	
The Empire District Electric Company	ER99-1757	Ozark Beach- Unit 7	The Empire District Electric Company	The Empire District Electric Company	N/A	SPP	SPP	Jun-1931	4	4	S	
The Empire District Electric Company	ER99-1757	Ozark Beach- Unit 8	The Empire District Electric Company	The Empire District Electric Company	N/A	SPP	SPP	Jun-1931	4	4	S	
The Empire District Electric Company	ER99-1757	Ozark Beach- Unit 5	The Empire District Electric Company	The Empire District Electric Company	N/A	SPP	SPP	Jun-1931	4	4	S	
The Empire District Electric Company	ER99-1757	State Line- Unit 1	The Empire District Electric Company	The Empire District Electric Company	N/A	SPP	SPP	May-1995	123	94 (s)/ 104 (w)	S	
The Empire District Electric Company	ER99-1757	State Line Combined Cycle- Unit 2-2	The Empire District Electric Company	The Empire District Electric Company	N/A	SPP	SPP	Jun-1997	180	158	S	3
The Empire District Electric Company	ER99-1757	State Line Combined Cycle- Unit 2-3	The Empire District Electric Company	The Empire District Electric Company	N/A	SPP	SPP	Jun-2001	206.5	178	S	4
The Empire District Electric Company	ER99-1757	State Line Combined Cycle- Unit 2-1	The Empire District Electric Company	The Empire District Electric Company	N/A	SPP	SPP	Jun-2001	181	159	S	5
The Empire District Electric Company	ER99-1757	Iatan- Unit 1	The Empire District Electric Company	The Empire District Electric Company	N/A	SPP	SPP	May-1980	726	712.9	S	6
The Empire District Electric Company	ER99-1757	Iatan- Unit 2	The Empire District Electric Company	The Empire District Electric Company	N/A	SPP	SPP	Aug-2010	914	881.5	S	7
The Empire District Electric Company	ER99-1757	Plum Point	The Empire District Electric Company	The Empire District Electric Company	N/A	MISO	South	Sep-2010	720	670	S	8
Algonquin Energy Services Inc.	ER10-310	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
Algonquin Northern Maine Gen Co.	NA	Caribou Hydro	Algonquin Northern Maine	Algonquin Northern Maine Gen Co.	NA	NBSO	Northeast	1926	0.9 MW (nameplate)	0.9 MW	N	
Algonquin Northern Maine Gen Co.	NA	Squa Pan	Algonquin Northern Maine	Algonquin Northern Maine Gen Co.	NA	NBSO	Northeast	1941	1.4 MW (nameplate)	1.4 MW	N	
Algonquin Power Sanger, LLC	NA	Sanger	Algonquin Power Sanger, LLC	Algonquin Power Sanger, LLC	NA	CAISO	Northwest	1991	60 MW	60 MW	N	
Algonquin Power Windsor Locks LLC	ER10-716	Windsor Locks	Algonquin Power Windsor Locks LLC	Algonquin Power Windsor Locks LLC	NA	ISO-NE	Northeast	1990	71 MW (nameplate)	71 MW	N	
Algonquin SKIC 20 Solar, LLC	ER16-2169	Bakersfield I	Algonquin SKIC 20 Solar, LLC	Algonquin SKIC 20 Solar, LLC	NA	CAISO	Northwest	2015	20 MW	20 MW	K	
Algonquin SKIC 10 Solar, LLC	ER16-2364	Bakersfield II	Algonquin SKIC 10 Solar, LLC	Algonquin SKIC 10 Solar, LLC	NA	CAISO	Northwest	2016	10 MW	10 MW	K	
Algonquin Tinker Gen Co.	ER99-1936	Tinker Diesel	Algonquin Tinker Gen Co.	Algonquin Tinker Gen Co.	NA	NBSO	Northeast	1948	1 MW (nameplate)	1 MW	N	
Algonquin Tinker Gen Co.	ER99-1936	Tinker Hydro	Algonquin Tinker Gen Co.	Algonquin Tinker Gen Co.	NA	NBSO	Northeast	1925, 1965	33.5 MW (nameplate)	33.5 MW	N	
GSG 6, LLC	ER11-4694	Shady Oaks Wind	GSG 6, LLC	GSG 6, LLC	NA	PJM	Northeast	2012	109.5 MW (nameplate)	109.5 MW	N	
Liberty Utilities (CalPeco Electric) LLC	NA	Kings Beach	Liberty Utilities (CalPeco Electric) LLC	Liberty Utilities (CalPeco Electric) LLC	1/1/2015	NV Energy	WSPP	2008	15 MW (nameplate)	15 MW	N	14

Energy Affiliates of Applicant
Asset Appendix: Generation Assets

[A]	[B]	[C]	[D]	[E]	[F]	[G] Location [H]		[I]	[J]	[K]	[L]	[M]
Filing Entity and its Energy Affiliates	Docket # where MBR authority was granted	Generation Name (Plant or Unit Name)	Owned By	Controlled By	Date Control Transferred	Market / Balancing Authority Area	Geographic Region	In-Service Date	Capacity Rating: Nameplate (MW)	Capacity Rating: Used in Filing (MW)	Capacity Rating: Methodology Used in [K]: (N)Nameplate, (S)seasonal, 5-yr (U)nit, 5-yr (E)A, (A)lternative	End Note Number (Enter text in End Note Tab)
Liberty Utilities (Granite State Electric) Corp.	ER05-1249	NA	NA	NA	NA	NA	NA	NA	NA	NA		
Minonk Wind, LLC	ER12-1680	Minonk Wind	Minonk Wind, LLC	Minonk Wind, LLC	NA	PJM	Northeast	2012	200 MW (nameplate)	200 MW	N	
Odell Wind Farm, LLC	ER15-2361-003	Odell Wind	Odell Wind Farm, LLC	Odell Wind Farm, LLC	NA	MISO	Midwest	2016 (est)	200MW	200 MW	N	
Sandy Ridge Wind, LLC	ER11-113	Sandy Ridge Wind	Sandy Ridge Wind, LLC	Sandy Ridge Wind, LLC	NA	PJM	Northeast	2012	50 MW (nameplate)	50 MW	N	
Senate Wind, LLC	NA	Senate Wind	Senate Wind, LLC	Senate Wind, LLC	NA	ERCOT Reliability Council of Texas	ERCOT	2012	150MW	150 MW	N	
Deerfield Wind Energy, LLC	ER16-2703	Deerfield Wind	Deerfield Wind Energy, LLC	Deerfield Wind Energy, LLC	NA	MISO	Midwest	2017	149 MW	149 MW	N	
Luning Energy LLC	ER16-2412	Luning Energy	Luning Energy LLC	Luning Energy LLC	NA	NV Energy BAA	Northwest	2017	50 MW	50 MW	N	

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Energy Affiliates of Applicant
 Asset Appendix: Long-Term Purchased Power Agreements (PPA)
 (As of June 2016)

Note:

Energy only contracts must be converted to MW
 Only report Contracts one year or longer

[A]	[B]	[C]	[D]	[E] Location		[G]	[H]	[I]
Filing Entity and its Energy Affiliates	Docket # where MBR authority was granted	Seller Name	Amount of PPA (MW)	Market / Balancing Authority Area	Geographic Region	Start Date (mo/da/yr)	End Date (mo/da/yr)	End Note Number (Enter text in End Note Tab)
The Empire District Electric Company	ER99-1757	Elk River Windfarm LLC	150	SPP	SPP	12/10/2004	12/15/2025	9
The Empire District Electric Company	ER99-1757	Cloud County Windfarm LLC	105	SPP	SPP	6/19/2007	12/15/2028	10
The Empire District Electric Company	ER99-1757	Plum Point Energy Associates LLC	50	MISO	Central	3/3/2006	9/1/2040	11
Liberty Utilities (CalPeco Electric) LLC	ER16-881-000 (Cost Based)	Sierra Pacific Power Company d/b/a NV Energy	n/a	NV Energy	WSPP	1/1/2016	12/30/2020	13

Energy Affiliates of Applicant
 Asset Appendix: Transmission Assets / Natural Gas Assets
 (As of June 2016)

Electric Transmission Assets and/or Natural Gas Intrastate Pipelines and/or Gas Storage Facilities

[A]	[B]	[C]	[D]	[E]	[F]	[G]	[H]	[I]	[J]
Filing Entity and its Energy Affiliates	Cite to order accepting OATT or order approving the transfer of transmission facilities to an RTO or ISO	Asset Name and Use	Owned By	Controlled By	Date Control Transferred	Location		Size	End Note Number (Enter text in End Note Tab)
						Market / Balancing Authority Area	Geographic Region	Size: (length and kV)	
The Empire District Electric Company	140 FERC ¶ 61,087 (2012); Empire Dist. Elec. Co., Docket No. ER12-1813-000 (Nov. 18, 2013) (approving settlement); See also Docket No. ER12-2289-000.	Electric Transmission 161 kV Lines	The Empire District Electric Company	The Empire District Electric Company	N/A	SPP	SPP	442.93	
The Empire District Electric Company	140 FERC ¶ 61,087 (2012); Empire Dist. Elec. Co., Docket No. ER12-1813-000 (Nov. 18, 2013) (approving settlement); See also Docket No. ER12-2289-000.	Electric Transmission 69 kV Lines	The Empire District Electric Company	The Empire District Electric Company	N/A	SPP	SPP	790.05	
The Empire District Electric Company	140 FERC ¶ 61,087 (2012); Empire Dist. Elec. Co., Docket No. ER12-1813-000 (Nov. 18, 2013) (approving settlement); See also Docket No. ER12-2289-000.	Electric Transmission 34.5 kV Lines	The Empire District Electric Company	The Empire District Electric Company	N/A	SPP	SPP	91.42	
The Empire District Electric Company	140 FERC ¶ 61,087 (2012); Empire Dist. Elec. Co., Docket No. ER12-1813-000 (Nov. 18, 2013) (approving settlement); See also Docket No. ER12-2289-000.	Electric Transmission 345 kV Lines	The Empire District Electric Company	The Empire District Electric Company	N/A	SPP	SPP	21.9	
Liberty Utilities (EnergyNorth Natural Gas) Corp.	NA	Natural Gas Transmission Lines	Liberty Utilities (EnergyNorth Natural Gas) Corp.	Liberty Utilities (EnergyNorth Natural Gas) Corp.	NA	NA	Northeast	2.8 miles	
Liberty Utilities (Midstates Natural Gas) Corp.	NA	Natural gas transmission line	Liberty Utilities (Midstates Natural Gas) Corp.	Liberty Utilities (Midstates Natural Gas) Corp.	NA	NA	Central	243 miles	
Liberty Utilities (Peach State Natural Gas) Corp.	NA	Natural gas transmission line	Liberty Utilities (Peach State Natural Gas) Corp.	Liberty Utilities (Peach State Natural Gas) Corp.	NA	NA	Central	70 miles	

Energy Affiliates of Empire District Electric Company
 Asset Appendix: End Notes
 (As of June 2016)

End Notes for Entries in the Generation, Long-term PPA and Transmission Lists

[A]	[B]	[C]
End Note Number	List (Generation, PPA or Transmission)	Explanatory Note
1	Generation	Unit 9 of the Riverton facility was retired in June 2015.
2	Generation	Unit 8 of the Riverton facility was retired in June 2015.
3	Generation	The Empire District Electric Company ("EDE") owns a 60% undivided interest in each of the units of the State Line Combined Cycle facility. Accordingly, EDE has rights to approximately 94.8 MW of Unit 2-2 of the State Line Combined Cycle facility.
4	Generation	EDE owns a 60% undivided interest in each of the units of the State Line Combined Cycle facility. Accordingly, EDE has rights to a 106.8 MW of Unit 2-3 of the State Line Combined Cycle facility.
5	Generation	EDE owns a 60% undivided interest in each of the units of the State Line Combined Cycle facility. Accordingly, EDE has rights to a 95.4 MW of Unit 2-1 of the State Line Combined Cycle facility.
6	Generation	EDE owns a 12% undivided interest in each of the units of the Iatan facility. Accordingly, EDE has rights to approximately 85.5 MW of the Iatan facility.
7	Generation	EDE owns a 12% undivided interest in each of the units of the Iatan facility. Accordingly, EDE has rights to approximately 105.7 MW of the Iatan facility.
8	Generation	EDE owns a 7.5% undivided interest in the Plum Point Energy Center, which gives EDE rights to approximately 50 MW of the output of the facility.
9	Long-Term PPA	EDE's long-term firm power purchase agreement with Elk River Windfarm LLC is unit specific.
10	Long-Term PPA	EDE's long-term firm power purchase agreement with Cloud County Windfarm LLC is unit specific.
11	Long-Term PPA	EDE's long-term firm power purchase agreement with Plum Point Energy Associates LLC is unit specific.
12	Generation	As reported in EDE's June 2015 triennial, Unit 12 of the Riverton facility was updated to an combined cycle unit which generates power.
13	Long-Term PPA	Full/Partial Requirements service with NV Energy. NV Energy to provide energy/renewable/capacity/transmission service. LU can provide up to 60 MWs of supply from LU owned renewable resources.
14	Generation	Ownership transferred at purchase of LU(CalPeco) from NV Energy.

Appendix A: Standard Screen Format (Data provided for illustrative purposes only)**Part II – Market Share Analysis****Staff Notes:**

The file differs from the file published in the NOPR:

1. All entered values must be positive (no parenthesis/negative numbers)
2. The formulas (and the text in the row description) have been changed to reflect number 1.
3. Instruction: *Enter all numeric values as positive numbers (blue values)*

Don't enter values into an outlined cell (black values)

Applicant-> **Algonquin Power Sanger LLC**Study Area -> **CAISO BAA**Data Year -> **Dec 2013-Nov 2014**

As filed by the Applicant/Seller

Row	Winter (MW)	Spring (MW)	Summer (MW)	Fall (MW)	Reference
Seller and Affiliate Capacity (owned, controlled or under LT contract)					
A	90	90	90	90	
A1	0	0	0	0	
B	0	0	0	0	
B1	0	0	0	0	
C	90	90	90	90	
D	0	0	0	0	
E	62	62	62	62	
Capacity Deductions					
F	29,008	29,123	36,707	32,667	ECP Triennial
G	0	0	0	0	
H	29,008	29,123	36,707	32,667	
I	1,740	1,747	2,202	1,960	ECP Triennial
J	0	0	0	0	
K	1,740	1,747	2,202	1,960	
Non-Affiliate Capacity (owned, controlled or under LT contract)					
L	62,194	61,741	62,073	62,388	ECP Triennial, minus row A
L1	4,847	4,846	4,846	4,846	ECP Triennial
M	0	0	0	0	
M1	0	0	0	0	
N	0	0	0	0	
O	4,260	6,672	1,739	6,043	ECP Triennial
P	0	0	0	0	Conservative assumption
Supply Calculation					
Q	32,033	29,045	26,271	26,564	
R	62	62	62	62	
S	32,095	29,107	26,333	26,626	
T	0.2%	0.2%	0.2%	0.2%	
	Pass	Pass	Pass	Pass	
U	62	62	62	62	
V	-	-	-	-	
	Yes	Yes	Yes	Yes	
	0.2%	0.2%	0.2%	0.2%	
	Pass	Pass	Pass	Pass	

* Transmission owners filing triennials should use the SIL values from their Submittal 1, Row 10 (see *Puget Sound Energy, Inc.*, 135 FERC ¶ 61,254 (2011)).

Other sellers should use Commission-accepted SIL values, if they exist for the study area and study period. If these values do not exist, sellers should use SIL values that have been filed but not accepted.

Appendix A: Standard Screen Format (Data provided for illustrative purposes only)

Part I – Pivotal Supplier Analysis

Staff Notes:

The file differs from the file published in the NOPR:

1. All entered values must be positive (no parenthesis/negative numbers)
2. The formulas (and the text in the row description) have been changed to reflect number 1.
3. The text in row 13 "Date of Filing" has been replaced with "Data Year"
4. Instruction: *Enter all numeric values as positive numbers (blue values)*

Don't enter values into an outlined cell (black values)

Applicant-> **Algonquin Power Sanger LLC**
 Market -> **CAISO BAA**
 Data Year -> **Dec 2013-Nov 2014**

Row

Generation		Reference
Seller and Affiliate Capacity (owned or controlled)		
A Installed Capacity (from inside the study area)	90	
A1 Remote Capacity (from outside the study area)	0	
B Long-Term Firm Purchases (from inside the study area)	0	
B1 Long-Term Firm Purchases (from outside the study area)	0	
C Long-Term Firm Sales (in and outside the study area)	-	
D Uncommitted Capacity Imports	62	
Non-Affiliate Capacity (owned or controlled)		
E Installed Capacity (from inside the study area)	59,067	ECP Triennial, m
E1 Remote Capacity (from outside the study area)	4,846	ECP Triennial
F Long-Term Firm Purchases (from inside the study area)	0	
F1 Long-Term Firm Purchases (from outside the study area)	-	
G Long-Term Firm Sales (in and outside the study area)	-	
H Uncommitted Capacity Imports	0	
I Study Area Reserve Requirement	2,238	ECP Triennial
J Amount of Line I Attributable to Seller, if any	-	
K Total Uncommitted Supply (A+A1+B+B1+D+E+E1+F+F1+H-C-G-I-M)	24,521	
Load		
L Balancing Authority Area Annual Peak Load	44,694	ECP Triennial
M Average Daily Peak Native Load in Peak Month	37,306	ECP Triennial
N Amount of Line M Attributable to Seller, if any	0	
O Wholesale Load (L-M)	7,388	
P Net Uncommitted Supply (K-O)	17,133	
Q Seller's Uncommitted Capacity (A+A1+B+B1+D-C-J-N)	152	
Result of Pivotal Supplier Screen (Pass if Line Q < Line P) (Fail if Line Q > Line P)	Pass	
Result of Pivotal Supplier Screen w/o Competing Imports	Pass	
Total Imports (Sum D,H), as filed by Seller ->	62	
% of SIL for Seller's imported capacity ->	1.00	
% of SIL for Other's imported capacity ->	0.00	

SIL value* -> -

Do Total Imports exceed the SIL value? -> Yes

* Transmission owners filing triennials should use the SIL values from their Submittal 1, Row 10 (see *Puget Sound Energy, Inc.*, 135 FERC ¶ 61,254 (2011))
 Other sellers should use Commission-accepted SIL values, if they exist for the study area and study period. If these values do not exist, sellers should use SIL values that have been filed but not accepted.

minus row A

).

[A]	[B]	[C]	[D]	[E]	[F]	[G]	[H]	[I]	[J]	[K]	[L]	[M]	[N]	[O]	[P]	[Q]	[R]	[S]	[T]	[U]	[V]	[W]	[X]	[Y]	[Z]
				Wholesale Market Share Screen (MSS)										Pivotal Supplier Screen (PSS)											
				Imported Capacity				Seasonal Total Uncommitted Capacity				Market Share Results (%)													
Company	Analyst	Mkt	Applicant Name	Wntr [Row E + Row P]	Spring [Row E + Row P]	Sum [Row E + Row P]	Fall [Row E + Row P]	Wntr [Row S]	Spring [Row S]	Sum [Row S]	Fall [Row S]	Wntr [Row T]	Spring [Row T]	Sum [Row T]	Fall [Row T]	MSS Pass / Fail w/o cmp't imp's	Seller Inst1 Cap [Row A]	A-A1+B-B1 +D	BAA Res'tv Rqmnt'1 [Row J]	Tot Unc'mtd Capacity [Row K]	Whist Load [Row O]	Net unc'mtd Supply [Row P]	Seller unc'mtd Supply [Row Q]	PSS Result [Pass/Fail]	PSS Pass / Fail w/o cmp't imp's
0				62	62	62	62	32,095	29,107	26,333	26,626	0.2%	0.2%	0.2%	0.2%	Pass	90	152	2,238	24,521	7,368	17,133	152	Pass	Pass

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