



April 15, 2016

**VIA E-Tariff Filing**

Kimberly D. Bose, Secretary  
Nathaniel J. Davis Sr., Deputy Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, DC 20426

Re: Roswell Solar, LLC, Docket No. ER16-\_\_\_\_-000  
Application for Authorization to Sell Energy and Capacity at Market-Based Rates

Dear Ms. Bose and Mr. Davis:

Pursuant to Section 205 of the Federal Power Act<sup>1</sup>, Rule 205 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission<sup>2</sup>, and Part 35 of the Commission's regulations<sup>3</sup>, please find for filing the Application of Roswell Solar, LLC for Authorization to make market-based sales of energy, capacity and certain ancillary services under a market-based rate tariff.

**List of Documents Submitted with this Application Filing**

Attachment A -	Live Oak Solar, LLC Market-Based Rate Tariff, Volume No. 1
Appendix A -	Market Power Analysis
Appendix B-1 -	Generation Assets List
Appendix B-2 -	Electric Transmission Assets and/or Natural Gas Intrastate Pipelines and/or Gas Storage Projects
Appendix B-3 -	Long-Term Purchased Power Agreements (PPA)
Appendix B-4-	Endnotes

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<sup>1</sup> 16 U.S.C. § 824d.

<sup>2</sup> 18. C.F.R. § 385.205 (2015).

<sup>3</sup> 18 C.F.R. Part 35.

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Nathaniel J. Davis, Sr., Deputy Secretary  
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If you have any questions, please contact the undersigned.

Respectfully submitted,

/s/ Gunnar Birgisson

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

**Roswell Solar, LLC**

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**Docket No. ER16-\_\_\_\_-000**

**REQUEST FOR AUTHORIZATION TO SELL ENERGY  
AND CAPACITY AT MARKET-BASED RATES,  
AND REQUEST FOR WAIVERS AND BLANKET APPROVAL**

Roswell Solar, LLC (“Applicant” or “Roswell Solar”) submits for filing, pursuant to Section 205 of the Federal Power Act (“FPA”),<sup>1</sup> Rule 205 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission” or “FERC”),<sup>2</sup> and Part 35 of the Commission’s regulations,<sup>3</sup> an application (“Application”) for authorization to make market-based sales of energy, capacity and certain ancillary services under a market-based rate tariff (“Tariff”). Applicant respectfully requests that the Commission permit this Tariff to become effective June 15, 2016, and grant with the same effective date such waivers and blanket approvals described in this Application that the Commission has routinely granted to entities with market-based rates.

**I. List of Documents Submitted with this Filing**

Attachment A -	Roswell Solar, LLC Tariff, Volume No. 1
Appendix A -	Market Power Analysis
Appendix B-1 -	Generation Assets List
Appendix B-2 -	Electric Transmission Assets and/or Natural Gas Intrastate Pipelines and/or Gas Storage Projects
Appendix B-3-	Long-Term Purchased Power Agreements (PPA)
Appendix B-4-	Endnotes

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<sup>1</sup> 16 U.S.C. § 824d.

<sup>2</sup> 18 C.F.R. § 385.205 (2015).

<sup>3</sup> 18 C.F.R. Part 35.

## II. Communications

Copies of all correspondence should be addressed to the following:

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## III. Description of Applicant and Relevant Affiliates

As required by Order Nos. 697 and 697-A (Appendix B)<sup>4</sup> and Order No. 816,<sup>5</sup> the generation and transmission assets of Applicant and its affiliates are set forth in Appendix B-1 (generation) and Appendix B-2 (transmission). Below, Applicant provides a description of itself, its affiliates located in the Southwest power Pool, Inc. (“SPP”) balancing authority area (“BAA”).

### A. Roswell Solar, LLC

Roswell Solar, a Delaware limited liability company, will control and operate a photovoltaic generating facility (the “Facility”) with a nameplate capacity of approximately 70 MW located in Chaves County, New Mexico within the SPP BAA.<sup>6</sup> Applicant has submitted a notice of self-certification as an exempt wholesale generator to the Commission.<sup>7</sup> The Facility may start producing test energy as early as June 15, 2016. The Facility will interconnect with

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<sup>4</sup> *Market-Based Rates for Wholesale Sales of Electric Energy, Capacity and Ancillary Services by Public Utilities*, III FERC Stats. & Regs., Regs. Preambles ¶ 31,252 (“Order No. 697”), *clarified*, 121 FERC ¶ 61,260 (2007) (“Clarification Order”), *order on reh'g and clarification*, 123 FERC ¶ 61,055 (2008) (“Order No. 697-A”), *order on reh'g and clarification*, Order No. 697-B, 125 FERC ¶ 61,326, *order on reh'g and clarification*, Order No. 697-C, 127 FERC ¶ 61,254 (2009).

<sup>5</sup> *Refinements to Policies and Procedures for Market-Based Rates for Wholesale Sales of Electric Energy, Capacity and Ancillary Services by Public Utilities*, 153 FERC ¶ 61,065 (“Order No. 816”) (2015).

<sup>6</sup> The project is owned by Chaves County and is leased to Roswell Solar.

<sup>7</sup> See Application of Exempt Wholesale Generator Status of Roswell Solar, LLC, Docket No. EG16-69-000, submitted on March 11, 2016 (letter order pending).

Southwestern Public Service Company's ("SPSC") transmission system. Applicant has also entered into a long-term power purchase agreement ("PPA") with SPSC, a non-affiliate, for 100% of the power produced by the facility, including the test energy.

Applicant is a wholly-owned direct subsidiary of Roswell Solar Holdings, LLC, a Delaware limited liability company, which in turn is a wholly-owned direct subsidiary of ESI Energy, LLC. ESI Energy, LLC is a wholly-owned direct subsidiary of NextEra Energy Resources, LLC ("NextEra Resources"), which is a wholly-owned direct subsidiary of NextEra Energy Capital Holdings, Inc., a Florida corporation, which in turn is a wholly-owned direct subsidiary of NextEra Energy, Inc. ("NextEra"), a Florida corporation. NextEra Resources is the merchant power subsidiary of NextEra. NextEra Resources' subsidiaries currently own or operate merchant generating facilities ("NextEra Resources Companies") in 25 States and Canada with a combined net generating capacity of over 19,000 MW.

NextEra Resources' subsidiaries own various interconnection facilities used solely for connecting generating facilities to the transmission grid. In some instances, the Commission has required NextEra Resources' subsidiaries to file an OATT after receiving a request for service from a third party. First, certain NextEra Resources' subsidiaries have an ownership interest in Sagebrush, which filed an OATT on December 7, 2009 in Docket No. EL10-23-000.<sup>8</sup> Second, the Commission directed Sky River to submit an OATT for transmission service over the Wilderness Line for non-owners, which was submitted to the Commission on April 1, 2011 in Docket No. ER11-3277-000.<sup>9</sup> Third, Peetz Logan Interconnect, LLC ("PLI") received a request for interconnection and transmission service from a third party non-affiliate and submitted an

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<sup>8</sup> *Sagebrush, a California partnership*, 130 FERC ¶ 61,093, *order on reh'g*, 132 FERC ¶ 61,234 (2010).

<sup>9</sup> *Sky River LLC*, 136 FERC ¶ 61,162 (2011).

OATT on February 28, 2011 in Docket No. ER11-2970-000.<sup>10</sup> In addition, a number of other subsidiaries have received waivers from the Commission’s open access policies in connection with joint use of interconnection facilities by affiliated companies.<sup>11</sup>

NextEra also owns Florida Power & Light Company (“FPL”), a franchised public utility that provides wholesale and retail electric service to customers in the State of Florida. To serve this load, FPL owns approximately 24,100 MW of generation in peninsular Florida. FPL’s transmission facilities are located within the State of Florida and are administered pursuant to the FPL OATT, which is on file with the Commission.<sup>12</sup> Additionally, NextEra owns NextEra Energy Transmission, LLC (f/k/a U.S. Transmission Holdings, LLC), which in turn owns New Hampshire Transmission, LLC (“NHT”), an electric utility that owns a single transmission asset, the Seabrook Substation, located in Seabrook, New Hampshire. NHT provides wholesale transmission service to its affiliate, NextEra Energy Seabrook, LLC through a Local Network Service Tariff on file with the Commission.<sup>13</sup> ISO New England, Inc. has operational control of

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<sup>10</sup> *Peetz Logan Interconnect, LLC*, 136 FERC ¶ 61,075 (2011); 142 FERC ¶ 61,035 (2013). The third party has taken no further action to interconnect after submitting its request. On January 28, 2016, PLI filed a Notice of Cancellation of its OATT in Docket No. ER16-807-000, requesting a March 29, 2016 effective date. This Notice of Cancellation is pending before the Commission.

<sup>11</sup> See *FPL Energy Oklahoma Wind, LLC*, Docket No. ER05-628-000, Letter Order (issued Mar. 23, 2005); *Peetz Table Wind Energy, LLC*, 123 FERC ¶ 61,192 (2008); *FPL Energy Oliver Wind, LLC*, 123 FERC ¶ 61,246 (2008); *Ashtabula Wind, LLC*, 127 FERC ¶ 61,215 (2009); 134 FERC ¶ 61,056 (2011); *Langdon Wind, LLC*, 127 FERC ¶ 61,212 (2009); *Crystal Lake Wind, LLC*, 127 FERC ¶ 61,213 (2009); *Story Wind, LLC*, 128 FERC ¶ 61,080 (2009); *Minco Wind Interconnection Services, LLC*, 137 FERC ¶ 61, 224 (2011); *High Majestic Wind Energy Center, LLC*, 139 FERC ¶ 61,220 (2012); *Limon Wind, LLC*, 141 FERC ¶ 61,064 (2012); *Sky River LLC*, 143 FERC ¶ 61,241 (2013); *Genesis Solar, LLC*, 145 FERC ¶ 61,142 (2013); and *Desert Sunlight 250, LLC et al.*, 145 FERC ¶ 61,065 (2013); *Palo Duro Interconnection, LLC*, 149 FERC ¶ 61,205 (2014), *Seiling Wind Interconnection Services, LLC*, 149 FERC ¶ 61,155 (2014); *FPL Energy Oklahoma Wind, LLC*, Docket No. OA14-3-000, 149 FERC ¶ 61,131(2014); *Limon Wind II, LLC and Limon Wind III, LLC*, Docket No. OA14-4-000, 150 FERC ¶ 61,136 (2015). Several of these entities operate in SPP and have market-based rate authority from the Commission, which was obtained solely for the purpose of obtaining a waiver from Part 34 of the Commission’s regulations. See *Minco Wind Interconnection Services, LLC*, Docket No. ER12-895-000, Letter Order (issued Feb. 29, 2012); *Palo Duro Wind Interconnection Services, LLC*, Docket No. ER15-58-000, Letter Order (issued Nov. 20, 2014); and *Seiling Wind Interconnection Services, LLC*, Docket No. ER15-30-000, Letter Order (issued Nov. 25, 2014).

<sup>12</sup> FPL FERC Electric Tariff, 2nd Revised Volume No. 6.

<sup>13</sup> New Hampshire Transmission, LLC, FERC Electric Tariff No. 3.

the regional transmission facilities associated with the Seabrook Substation.<sup>14</sup> In addition, NextEra Energy Transmission West, LLC (“NEET West”) filed with the Commission in Docket No. ER15-2239-000 a transmission owner tariff for certain transmission projects it is developing in the California Independent System Operator region, the earliest of which will be in service in 2017. In January 2016, the Commission accepted, subject to condition, NEET West’s proposed tariff, to become effective October 20, 2015.<sup>15</sup>

The following is a brief description of the NextEra Resources Companies and their affiliates operating in the SPP market (see Appendix B-1 for descriptions of other NextEra affiliated companies):

Blackwell Wind, LLC (“Blackwell”). Blackwell owns and operates a 59.8 MW wind-powered generation facility located in Kay County, Oklahoma. Blackwell Wind is authorized by the Commission to sell power at market-based rates.<sup>16</sup>

Breckinridge Wind Project, LLC (“Breckinridge”). Breckinridge owns and operates a 98.1 MW wind-powered generation facility located in Garfield County, Oklahoma. Breckinridge is authorized by the Commission to sell power at market-based rates.<sup>17</sup>

Cedar Bluff Wind, LLC (“Cedar Bluff”). Cedar Bluff owns and operates a 200 MW wind-powered generation facility located in Ness, Ellis and Trego counties, Kansas. Cedar Bluff is authorized by the Commission to sell power at market-based rates.<sup>18</sup>

Cimarron Wind Energy, LLC (“Cimarron Wind”). Cimarron Wind owns and operates a 165.6 MW wind-powered generation facility located in Gray County, Kansas. Cimarron Wind is authorized by the Commission to sell power at market-based rates.<sup>19</sup>

Elk City Wind, LLC (“Elk City”). Elk City owns and operates a 98.9 MW wind-powered generation facility located in Roger Mills County, Oklahoma. Elk City is authorized by the Commission to sell power at market-based rates.<sup>20</sup>

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<sup>14</sup> See ISO New England, Inc. FERC Electric Tariff No. 3, Schedule 21 NHT, Original Sheet No. 4200.

<sup>15</sup> *NextEra Energy Transmission West, LLC*, 154 FERC ¶ 61,009 (2016).

<sup>16</sup> *Blackwell Wind, LLC*, Docket No. ER12-569-000, Letter Order (issued Jan. 24, 2012).

<sup>17</sup> *Breckinridge Wind Project, LLC*, Docket No. ER15-1925-000, Letter Order (issued Aug. 11, 2015).

<sup>18</sup> See *Cedar Bluff Wind, LLC*, Docket No. ER15-2676-000, Letter Order (issued Nov. 13, 2015).

<sup>19</sup> *Cimarron Wind Energy, LLC*, Docket No. ER12-775-000, Letter order (issued Mar. 5, 2012).

<sup>20</sup> *Elk City Wind, LLC*, Docket No. ER10-149-000, Letter Order (issued Dec. 31, 2009).

Elk City Wind II, LLC (“Elk City II”). Elk City II owns and operates a 100.8 MW wind-powered generation facility located in Roger Mills and Beckham Counties, Oklahoma. Elk City II is authorized by the Commission to sell power at market-based rates.<sup>21</sup>

Ensign Wind, LLC (“Ensign Wind”). Ensign owns and operates a 98.9 MW wind-powered generation facility located in Gray and Meade Counties, Kansas. Ensign Wind is authorized by the Commission to sell power at market-based rates.<sup>22</sup>

Florida Power & Light Company. FPL is a franchised public utility that provides wholesale and retail electric service to customers in the State of Florida. To serve its load, FPL owns approximately 24,100 MW of generation in Peninsular Florida. This generation is used to serve FPL’s load in Florida, and FPL owns no generation in the SPP BAA. Within the Southern Company Services, Inc. BAA, FPL owns a 76 percent share of the Scherer Unit 4 facility, providing it with a 651.1 MW (summer rating) share of the facility. In 1997, the Commission authorized FPL to engage in sales of energy and capacity outside of peninsular Florida at market-based rates.<sup>23</sup> In 2015, the Commission authorized FPL to engage in sales of energy and capacity outside of peninsular Florida into SPP and ISO markets where such sales had been previously authorized by the Commission.<sup>24</sup>

FPL Energy Cowboy Wind, LLC (“Cowboy Wind”). Cowboy Wind owns and operates a 147 MW wind-powered generation facility located near Weatherford, Oklahoma. Cowboy Wind is authorized by the Commission to sell power at market-based rates.<sup>25</sup>

FPL Energy Oklahoma Wind, LLC (“Oklahoma Wind”). Oklahoma Wind owns and operates a 102 MW wind-powered generation facility in Harper and Woodward Counties, Oklahoma. Oklahoma Wind is authorized by the Commission to sell power at market-based rates.<sup>26</sup>

FPL Energy Sooner Wind, LLC (“Sooner Wind”). Sooner Wind owns and operates a 51 MW wind-powered generation facility located in Harper and Woodward Counties, Oklahoma. Sooner Wind is authorized by the Commission to sell power at market-based rates.<sup>27</sup>

Gray County Wind Energy, LLC (“Gray County”). Gray County owns and operates a 112 MW wind-powered generation facility located in Gray County, Kansas. Gray County is authorized by the Commission to sell power at market-based rates.<sup>28</sup>

High Majestic Wind Energy Center, LLC (“Majestic Wind”). Majestic Wind owns and operates a 79.5 MW wind-powered generation facility located in Carson County, Texas. Majestic Wind is authorized to sell power at market-based rates.<sup>29</sup>

<sup>21</sup> *Elk City Wind II, LLC*, Docket No. ER11-2037-000, Letter Order (issued Dec. 15, 2010).

<sup>22</sup> *Ensign Wind, LLC*, Docket No. ER12-2227-000, Letter Order (issued Aug. 8, 2012).

<sup>23</sup> *Florida Power & Light Co.*, 81 FERC ¶ 61,107 (1997), Docket No. ER97-3359-000

<sup>24</sup> *Florida Power & Light Co.*, Docket No. ER15-1933-000 Letter Order (letter order issued Jul. 13, 2015).

<sup>25</sup> *FPL Energy Cowboy Wind, LLC*, Docket No. ER05-547-000, Letter Order (issued Mar. 23, 2005).

<sup>26</sup> *FPL Energy Oklahoma Wind, LLC*, Docket No. ER03-1332-000, Letter Order (issued Oct. 22, 2003).

<sup>27</sup> *FPL Energy Sooner Wind, LLC*, Docket No. ER03-1333-000, Letter Order (issued Dec. 19, 2003).

<sup>28</sup> *Gray County Wind Energy, LLC*, Docket No. ER01-1972-000, Letter Order (issued July 3, 2001).



High Majestic Wind II, LLC (“High Majestic II”). High Majestic II owns and operates a 79.6 MW wind-powered generation facility located in Carson County, Texas. High Majestic II is authorized to sell power at market-based rates.<sup>30</sup>

Mammoth Plains Wind Project, LLC (“Mammoth Plains”). Mammoth Plains owns and operates a 200 MW wind-powered generating facility located in Dewey and Blaine Counties, Oklahoma. Mammoth Plains is authorized by the Commission to sell power at market-based rates.<sup>31</sup>

Minco Wind, LLC (“Minco Wind”). Minco Wind owns and operates a 99.2 MW wind-powered generating facility located in Grady County, Oklahoma. Minco Wind is authorized by the Commission to sell power at market-based rates.<sup>32</sup>

Minco Wind II, LLC (“Minco II”). Minco II owns and operates a 108.8 MW wind-powered generating facility located in Gray and Caddo Counties, Oklahoma. Minco II is authorized by the Commission to sell power at market-based rates.<sup>33</sup>

Minco Wind III, LLC (“Minco III”). Minco III owns and operates a 100.8 MW wind-powered generating facility located in Gray and Caddo Counties, Oklahoma. Minco III is authorized by the Commission to sell power at market-based rates.<sup>34</sup>

NextEra Energy Power Marketing, LLC (“NEPM”). NEPM (f/k/a FPL Energy Power Marketing, LLC) is an affiliated power marketer with its principal place of business in Juno Beach, Florida. NEPM is authorized by the Commission to sell power at market-based rates.<sup>35</sup> NEPM, however, does not own, control or operate any generation in the region that is not otherwise deemed to be owned, controlled or operated by NEPM’s affiliates.

NEPM II, LLC (“NEPM II”). NEPM II is an affiliated power marketer with its principal place of business in Juno Beach, Florida. NEPM II is authorized by the Commission to sell power at market-based rates.<sup>36</sup> NEPM II, however, does not own, control or operate any generation in the region that is not otherwise deemed to be owned, controlled or operated by NEPM II’s affiliates.

Palo Duro Wind Energy, LLC (“Palo Duro”). Palo Duro owns and operates a wind-powered generating facility with 263 MW aggregate nameplate capacity located in

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<sup>29</sup> *High Majestic Wind Energy Center, LLC, et al.*, Docket No. ER10-1-000 *et al.*, Letter Order (issued Dec. 3, 2010).

<sup>30</sup> *High Majestic Wind II, LLC*, Docket No. ER12-1228-000, Letter Order (issued May. 3, 2012).

<sup>31</sup> *Mammoth Plains Wind Project, LLC*, Docket No. ER14-2707-000, Letter Order (issued October 24, 2014).

<sup>32</sup> *Minco Wind, LLC*, Docket No. ER10-2720-000, Letter Order (issued Oct. 20, 2010).

<sup>33</sup> *Minco Wind II, LLC*, Docket No. ER11-4428-000, Letter Order (issued Nov. 22, 2011).

<sup>34</sup> *Minco Wind III, LLC*, Docket No. ER12-1880-000, Letter Order (issued Jul. 12, 2012).

<sup>35</sup> *NextEra Energy Power Marketing, LLC*, Docket No. ER09-832-000, Letter Order (issued Apr. 16, 2009).

<sup>36</sup> *See NEPM II, LLC*, Docket No. ER11-4462-000, Letter Order (issued Dec. 9, 2011).

located in Beaver County, Oklahoma and Ochiltree and Hansford Counties, Texas. Palo Duro is authorized by the Commission to sell power at market-based rates.<sup>37</sup>

Seiling Wind, LLC (“Seiling Wind”). Seiling Wind owns and operates a 200 MW wind-powered generating facility located in Dewey County, Oklahoma. Seiling Wind is authorized by the Commission to sell power at market-based rates.<sup>38</sup>

Seiling Wind II, LLC (“Seiling Wind II”). Seiling Wind II owns and operates a 100 MW wind-powered generating facility located in Dewey and Woodward Counties, Oklahoma. Seiling Wind II is authorized by the Commission to sell power at market-based rates.<sup>39</sup>

Steele Flats Wind Project, LLC (“Steele Flats”). Steele Flats owns and operates a 75 MW wind-powered generating facility located in Jefferson County and Gage County, Nebraska. Steele Flats is authorized by the Commission to sell power at market-based rates.<sup>40</sup>

#### **IV. Request for Market-Based Rate Authority and request for Waiver**

Applicant proposes to sell wholesale electric energy, capacity, and certain ancillary services at market-based rates pursuant to the Tariff under the terms set forth in Attachment A hereto. Pursuant to Order No. 697, an applicant seeking market-based rate authority is required to demonstrate that, in the relevant markets, neither it nor its relevant affiliates possess, or have adequately mitigated, horizontal and vertical market power.

For a seller to demonstrate that it lacks horizontal market power, it must pass two indicative screens. To demonstrate that the seller does not possess vertical market power, it must show that it lacks transmission market power and does not control any other barrier to market entry in the relevant markets. Applicants also must comply with the Commission’s regulations with regard to affiliate abuse restrictions. No market power concerns are raised by this

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<sup>37</sup> *Palo Duro Wind Energy, LLC*, Docket No. ER14-2710-000, Letter Order (issued October 24, 2014).

<sup>38</sup> *Seiling Wind II, LLC*, Docket No. ER14-2708-000, Letter Order (issued October 24, 2014).

<sup>39</sup> *Seiling Wind II, LLC*, Docket No. ER14-2709-000, Letter Order (issued October 24, 2014).

<sup>40</sup> *Steele Flats Wind Project, LLC*, Docket No. ER13-2474-000, Letter Order (issued Nov. 21, 2013).

application, and Roswell Solar accordingly meets the Commission's criteria set forth in Order No. 697 for these categorizations.<sup>41</sup>

### **A. Horizontal Market Power Analyses**

In Order Nos. 697 and 697-A, the Commission codified substantially the same approach to analyzing horizontal market power it previously had adopted in *AEP Power Marketing, Inc., et al.*<sup>42</sup> In *AEP*, the Commission established two indicative screens for assessing generation market power: the Pivotal Supplier Analysis and the Market Share Analysis screens.<sup>43</sup> Under each screen, the Commission examines all of the generation owned or controlled by an applicant and its affiliates in the relevant market. In Order Nos. 697 and 697-A, the Commission approved the use of the indicative screens to analyze horizontal market power.

Appendix A to this Application contains the results of the Pivotal Supplier Analysis and Market Share Analysis performed with respect to the Applicant and its relevant affiliates' market power in the SPP market. The analyses was performed for Applicant and one affiliated solar generation project in the same BAA, Chaves County Solar, LLC (the two projects jointly referred to herein as the "New Mexico Solar Projects"), Chaves County Solar, LLC's application for market-based rates application will be submitted to the Commission shortly. As demonstrated below, Applicant passes both indicative screens. The default markets for demonstrating lack of market power are, first, the control area in which the seller's generation is physically located (*i.e.*, the balancing

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<sup>41</sup> *Market-Based Rates for Wholesale Sales of Electric Energy, Capacity and Ancillary Services by Public Utilities*, Order No. 697, FERC Stats. & Regs. ¶ 31,252 at n.1000, *clarified*, 121 FERC ¶ 61,260 (2007), *order on reh'g*, Order No. 697-A, FERC Stats. & Regs. ¶ 31,268, *clarified*, 124 FERC ¶ 61,055, *order on reh'g*, Order No. 697-B, FERC Stats. & Regs. ¶ 31,285 (2008), *order on reh'g*, Order No. 697-C, FERC Stats. & Regs. ¶ 31,291 (2009), *order on reh'g*, Order No. 697-D, FERC Stats. & Regs. ¶ 31,305 (2010), *aff'd sub nom. Montana Consumer Counsel v. FERC*, 659 F.3d 910 (9th Cir. 2011).

<sup>42</sup> 107 FERC ¶ 61,018, *order on reh'g*, 108 FERC ¶ 61,206 (2004) ("*AEP*").

<sup>43</sup> *AEP*, 107 FERC ¶ 61,108 at P 72.

authority area market) and, second, the markets directly connected to the balancing authority area (*i.e.*, the first-tier balancing authority area markets).<sup>44</sup>

### **1. Applicant passes the Pivotal Supplier Analysis**

The Pivotal Supplier Analysis seeks to determine if the relevant geographic market's annual peak demand can be served without an applicant's generation.<sup>45</sup> Once the wholesale market is determined, the test is straightforward – regardless of the generation owned or controlled by an applicant, the only issue is whether there is sufficient rival generation to serve the wholesale load; that is, annual peak load minus a native load proxy.

The Pivotal Supplier Analysis is based on the peak hour of the year and essentially determines which suppliers are available to serve demand in the relevant geographic market.<sup>46</sup> In implementing the Pivotal Supplier Analysis, an applicant determines the Net Uncommitted Supply available to compete at wholesale for the peak hour of the year for the relevant geographic market, which is equal to the Total Uncommitted Supply less the Wholesale Load for such peak hours.<sup>47</sup> If the applicant's uncommitted capacity is less than the Net Uncommitted Supply, then the applicant passes the Pivotal Supplier Analysis.

Appendix A sets forth the results of the Pivotal Supplier Analysis with respect to Applicant's and its relevant affiliates' ability to exercise horizontal market power in the SPP market. As shown in the Pivotal Supplier Analysis, Exhibit JRS-3, Applicant and its affiliates own or control approximately 2,621 MW in the SPP market, including the facilities owned by the New Mexico Solar Projects whose output, except for the Elk City II Wind, LLC facility, is all committed under long-term contracts to non-affiliates. There is no assigned imported power

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<sup>44</sup> *Id.* at PP 215, 231.

<sup>45</sup> *Id.* at P 35.

<sup>46</sup> *Id.* at P 41.

<sup>47</sup> *Id.* at P 42.

from adjacent markets. The Total Uncommitted Capacity in the SPP market is 43,194 MW, and the Wholesale Load in the SPP market is 7,172 MW. Therefore, the Net Uncommitted Supply in the SPP market (the Total Uncommitted Supply minus the Wholesale Load) is 36.022 MW. Because the uncommitted capacity of Applicant is 101 MW, Applicant passes the Pivotal Supplier Analysis screen.

## **2. Applicant passes the Market Share Analysis Screen**

The Market Share Analysis screen utilizes the uncommitted capacity owned or controlled by the applicant as compared to the uncommitted capacity of the relevant geographic market for each individual season.<sup>48</sup> As modified by Order Nos. 697 and 697-A, the Market Share Analysis uses the uncommitted capacity and native load proxy amounts determined as set forth in the Pivotal Supplier Analysis, but planned outages for each season will be considered.<sup>49</sup>

The Market Share Analysis then utilizes an initial threshold of 20 percent for each season, and if the applicant's uncommitted capacity for each season is not greater than 20 percent of the uncommitted capacity for the relevant BAA market for that season, then the applicant will satisfy the Market Share Analysis portion of the generation market power analysis and pass the screen.

The results of the Market Share Analysis with respect to the potential of Applicant and its relevant affiliates to exercise horizontal market power in the SPP market are set forth in Appendix A. The uncommitted capacity of Applicant and its relevant affiliates in the SPP market is in the range of 0.2% to 0.3% in all seasons, and thus Applicant passes the Market Share Analysis screen.

### **B. Applicant and Its Affiliates Lack Vertical Market Power Through Affiliation, Ownership or Control of Inputs to Electric Power Production**

In order for an applicant to receive authorization to charge market-based rates, the applicant and its affiliates must not have, or must have adequately mitigated, any vertical market power. As

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<sup>48</sup> Order No. 697 at P 34.

<sup>49</sup> *Id.* at P 35.

explained below, Applicant and its affiliates lack market power through its affiliation, ownership, or control of inputs to electric power production.

1. Neither Applicant nor other subsidiaries of NextEra Resources own or control transmission facilities, with the exception of facilities necessary to interconnect generating facilities to the transmission grid in the balancing authority areas in which they are located.<sup>50</sup> Roswell Solar hereby states that pursuant to section 35.28(d)(2) of the Commission's regulations,<sup>51</sup> its ownership of interconnection customer interconnection facilities qualifies it for waivers from the Commission's open access transmission tariff, OASIS and standards of conduct requirements. In addition, three of Applicant's affiliates that own generation tie lines outside the SPP BAA – Sagebrush, Sky River and Peetz Logan Interconnect – have filed OATTs with the Commission. Filing of an OATT is sufficient to show that any concerns regarding transmission market power have been mitigated. Applicant's affiliate, FPL, also owns and operates jurisdictional transmission facilities in the State of Florida. Service over FPL's transmission facilities is administered pursuant to the FPL OATT, which is on file with the Commission. In

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<sup>50</sup> As noted, some NextEra Resources generation subsidiaries own interconnection facilities that are used by NextEra Resources subsidiaries and third parties. Appendix B-2 lists both those transmission lines covered by an OATT and assets that are not transmission lines, but, rather, interconnection facilities that are used by more than one generator. The Commission has granted waiver from the requirement under Order Nos. 888 and 890 to file an OATT and the requirement under Order No. 889 to establish an Open-Access Same Time Information System (OASIS) for various assets owned by NextEra subsidiaries. See *FPL Energy Oklahoma Wind, LLC*, Docket No. ER05-628-000, Letter Order (issued Mar. 23, 2005); *Peetz Table Wind Energy, LLC*, 123 FERC ¶ 61,192 (2008); *FPL Energy Oliver Wind, LLC*, 123 FERC ¶ 61,246 (2008); *Ashtabula Wind, LLC*, 127 FERC ¶ 61,215 (2009); 134 FERC ¶ 61,056 (2011); *Langdon Wind, LLC*, 127 FERC ¶ 61,212 (2009); *Crystal Lake Wind, LLC*, 127 FERC ¶ 61,213 (2009); *Story Wind, LLC*, 128 FERC ¶ 61,080 (2009); *Minco Wind Interconnection Services, LLC*, 137 FERC ¶ 61, 224 (2011); *High Majestic Wind Energy Center, LLC*, 139 FERC ¶ 61,220 (2012); *Limon Wind, LLC*, 141 FERC ¶ 61,064 (2012), *Sky River LLC*, 143 FERC ¶ 61,241 (2013); *Genesis Solar, LLC*, 145 FERC ¶ 61,142 (2013); and *Desert Sunlight 250, LLC et al.*, 145 FERC ¶ 61,065 (2013); *Palo Duro Interconnection, LLC*, 149 FERC ¶ 61,205 (2014), *Seiling Wind Interconnection Services, LLC*, 149 FERC ¶ 61,155 (2014); *FPL Energy Oklahoma Wind, LLC*, Docket No. OA14-3-000, 149 FERC ¶ 61,131(2014); *Limon Wind II, LLC and Limon Wind III, LLC*, Docket No. OA14-4-000, 150 FERC ¶ 61,136 (2015). Several of these entities operate in SPP and have market-based rate authority from the Commission, which was obtained solely for the purpose of obtaining a waiver from Part 34 of the Commission's regulations. See *Minco Wind Interconnection Services, LLC*, Docket No. ER12-895-000, Letter Order (issued Feb. 29, 2012); *Palo Duro Wind Interconnection Services, LLC*, Docket No. ER15-58-000, Letter Order (issued Nov. 20, 2014); and *Seiling Wind Interconnection Services, LLC*, Docket No. ER15-30-000, Letter Order (issued Nov. 25, 2014).

<sup>51</sup> 18 C.F.R. 35.28(d)(2) (2015).

New England, NHT has a Local Network Service Tariff on file with the Commission associated with its ownership of the Seabrook Substation. Hence, FPL, NHT, Sagebrush, Sky River and Peetz Logan Interconnect have adequately mitigated any transmission market power that they may possess. NEET West also has a tariff on file with the Commission, but its projects are still in development.<sup>52</sup>

2. Applicant and its affiliates own or control certain intrastate natural gas transportation facilities, but do not own intrastate natural gas storage or distribution facilities.

Applicant is affiliated with NET Midstream, LLC (“NET”), the owner and operator of a portfolio of intrastate natural gas pipelines that is owned by NextEra Energy Partners, LP (“NEEP”), a publicly-traded “yieldco” whose shares are traded on the New York Stock Exchange, and which is controlled by NextEra Resources. NET owns or controls seven intrastate pipelines in Texas and one pipeline in Louisiana. NET Mexico Pipeline Partners, LLC (“NET Mexico”) owns an approximately 120-mile long pipeline from Agua Dulce, Texas to the U.S.-Mexico border near Rio Grande City, Texas. In addition to providing intrastate service, NET Mexico also has authority to transport gas in interstate commerce under Section 311 of the Natural Gas Policy Act of 1978 subject to Commission jurisdiction (“311 Service”). Eagle Ford Midstream, LP (“EFM”) owns an approximately 166-mile long pipeline in LaSalle, McMullen, Duval, Jim Wells and Nueces Counties, Texas. EFM provides both intrastate and 311 Service. Monument Pipeline, LP owns an approximately 78- mile pipeline that serves the south Houston, Texas area. LaSalle Pipeline, LP owns a 52-mile long pipeline from Tilden, Texas to Pearsall,

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<sup>52</sup> As discussed in section III.A, NextEra Energy Transmission West, LLC filed with the Commission in Docket No. ER15-2239-000 a transmission owner tariff for certain transmission projects it is developing in the California Independent System Operator region, the earliest of which will be in service in 2017. In January 2016, the Commission accepted the tariff for filing, subject to a compliance filing, with an effective date of October 20, 2015.

Texas that serves South Texas Electric Cooperative's ("STEC") Pearsall electric plant. South Shore Pipeline, LP owns an approximately 26- mile long pipeline that serves the City of Corpus Christi, Texas. Mission Valley Pipeline Company, LP owns a 0.5 long pipeline in Nursery, Texas that serves STEC's Sam Rayburn Power Plant. Red Gate Pipeline, LP owns an approximately 26-mile long pipeline that interconnects to NET Mexico in Hidalgo County, Texas and will serve STEC's Red Gate Power Plant that is currently under construction. Finally, Mission Natural Gas Company, LLC ("Mission") owns an approximately 1.3 mile long pipeline in West Feliciana Parish, Louisiana that runs from an interconnection with Texas Eastern Gas Transmission, LLC to an ultimate industrial user where it delivers all of its gas. Mission is considered a Hinshaw Pipeline, exempt from Commission jurisdiction pursuant to section 1(c) of the Natural Gas Act.<sup>53</sup>

3. Neither Applicant nor its affiliates own or control any sites for generation capacity development, other than those for which they are currently planning to build new generation facilities. Applicant does not believe that control of these sites allows Applicant or its affiliates to exercise vertical market power.

4. Neither Applicant nor its affiliates own or control sources of coal supplies or the transportation of coal supplies, such as barges, and rail cars.

5. As required by the Commission's regulations,<sup>54</sup> Applicant states that it has not erected barriers to entry into the SPP market, which is the relevant market, and will not erect barriers to entry into the SPP market.

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<sup>53</sup> Until recently, Applicant's affiliates have identified in their MBR applications an affiliation with FPLE Forney Pipeline, L.P., which owns and operates a 1,000 ft. natural gas Hinshaw pipeline (which is located within the boundaries of the FPLE Forney L.P. facility, a 1,789 MW natural gas-fired facility located in ERCOT) for connection to the Kinder Morgan pipeline. However, on April 4, 2016, the Forney generator and pipeline were sold to a non-affiliate.

<sup>54</sup> 18 C.F.R. § 35.37(e)(4).



### **C. The Commission Should Authorize Applicant to Sell Ancillary Services**

As required by Section 35.40 of the Commission's regulations, Applicant requests authorization to provide ancillary services as set forth in the proposed Tariff.<sup>55</sup> The Commission has authorized entities with market-based rate authorization to make sales of certain ancillary services into markets operated by RTOs and ISOs. Applicant requests authorization to make sales of certain ancillary services in RTO and ISO markets. As required by Order Nos. 697 and 697-A, Applicant's proposed Tariff identifies these ancillary services and the markets where Applicant will be authorized to offer such products.<sup>56</sup>

### **V. Compliance with Commission Regulations**

As required by Order Nos. 697 and 697-A, Applicant has included in its proposed Tariff a provision stating that Applicant will comply with, among other things, the provisions of Part 35, Subpart H of the Commission's regulations.<sup>57</sup> As Applicant's affiliate, FPL, is a franchised public utility with captive customers, Applicant will comply with the Affiliate Restrictions regulations.<sup>58</sup> Among other requirements, Applicant also will comply with the reporting requirements imposed on entities that are authorized to sell electric energy, capacity, and ancillary services. Applicant will submit electric quarterly reports in accordance with the requirements of Order No. 2001,<sup>59</sup> and it will inform the Commission promptly of any change in status that would reflect a departure from the facts that the Commission relied on in granting Applicant market-based rate authority.

Applicant's proposed Tariff includes one restriction that clarifies the Commission's Affiliate Restrictions regulations based on the facts and circumstances associated with

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<sup>55</sup> 18 C.F.R. § 35.40.

<sup>56</sup> Order No. 697 at P 1060.

<sup>57</sup> *Id.* at Appendix C.

<sup>58</sup> 18 C.F.R. § 35.39.

<sup>59</sup> *Order No. 2001, Revised Public Utility Filing Requirements*, Final Rule in Docket No. RM01-8-000 (issued Apr. 25, 2002).

Applicant's affiliate, FPL. FPL has market-based rate authority for sales outside of peninsular Florida, and in December 2015, FPL filed an application with the Commission for the sale at market-based rates of energy and capacity in certain BAAs in Peninsular Florida.<sup>60</sup> The application is pending.

Section 35.39(b) of the Commission's regulations prohibits the wholesale sale of energy and capacity between a franchised public utility with captive customers (*i.e.*, FPL) and a market-regulated power sales affiliate (*i.e.*, Applicant) without prior Commission authorization under Section 205 of the FPA.<sup>61</sup> Consistent with the practice of its NextEra Resources affiliates with market-based rate authority outside Florida, Applicant proposes to include the following restriction in its Tariff to clarify the appropriate scope of the restriction in section 35.39(b) of the Commission's regulations as it applies to Applicant:

Notwithstanding the Applicability under Section 2 above, with regard to non-affiliated persons or entities, Seller shall not make wholesale sales of energy or capacity to, or purchases of energy or capacity from, peninsular Florida without first receiving advance approval by the Federal Energy Regulatory Commission pursuant to a separate filing under Section 205 of the Federal Power Act.<sup>62</sup>

In addition, Applicant is a Category 2 seller in the SPP region, and is a Category 1 seller in the Central, Southeast, Southeast, Northwest, and Northeast regions. Accordingly, pursuant to the definition of Category 2 Sellers in Section 35.36(a)(3) of the Commission's regulations,<sup>63</sup> Applicant is a Category 2 seller in the SPP region. With respect to the other five regions, Applicant affirms that it (i) does not own or control generation in other regions; (ii) does not own, operate or control transmission facilities other than limited equipment necessary to connect

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<sup>60</sup> Florida Power & Light Company, *Request for Limited Authorization to Sell Energy, Capacity, and Specified Ancillary Services at Market-based Rates*, filed December 23, 2015 in Docket No. ER16-628.

<sup>61</sup> 18 C.F.R. 35.39(b).

<sup>62</sup> In this limitation on market-based rate authority, Applicant does not reaffirm the limitation set forth in the Commission's regulations, which prohibits such sales without first receiving Commission authorization for the transaction under Section 205 of Federal Power Act, as the Tariff's provision on compliance with Commission regulations incorporates this prohibition by reference.

<sup>63</sup> 18 C.F.R. § 35.36(a)(3) (2013).

individual generating facilities to the transmission grid (or have been granted waiver of the requirements of Order No. 888); (iii) is not affiliated with anyone that owns, operates or controls transmission facilities in the same region as seller's generation assets for those other regions; (iv) is not affiliated with a franchised public utility in the same region as its generation assets; and (v) that Applicant does not raise other vertical market power issues.<sup>64</sup> Thus, Applicant respectfully submits that it should be designated as a Category 1 Seller within the meaning of Section 35.36(a)(2) of the Commission's regulations<sup>65</sup> in all regions, except the SPP region, where it is a Category 2 Seller.

## **VI. Request for Waivers and Authorizations**

Applicant respectfully requests that the Commission waive certain of its filing requirements and grant such blanket authorizations as are traditionally accorded to applicants seeking to sell power at market-based rates. Specifically, Applicant requests:

- Waiver of the requirements of Parts 41, 101, and 141 of the Commission's regulations, except Sections 141.14 and 141.15;
- Waiver of the reporting requirements of Subparts B and C of Part 35 of the Commission's regulations, except Sections 35.12(a), 35.13(b), 35.15 and 35.16; and
- Blanket authorization under Part 34 of the Commission's regulations and section 204 of the FPA of all future issuances of securities and assumption of liability.

## **VII. Requested Effective Date**

Applicant respectfully requests that the Commission permit this Tariff to become effective June 15, 2016.

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<sup>64</sup> See Order No. 697 at P 849 n.1000.

<sup>65</sup> 18 C.F.R. § 35.36(a)(2) (2014).

### **VIII. Conclusion**

WHEREFORE, for the reasons set forth herein, Applicant submits that it satisfies all of the Commission's requirements to sell power at market-based rates and respectfully requests that the Commission accept the Tariff for filing, to become effective as of June 15, 2016, and grant it authority to sell energy and capacity in wholesale transactions at negotiated, market-based rates, and grant such other waivers as requested herein.

Respectfully submitted,

/s/ Gunnar Birgisson

Gunnar Birgisson

Senior Attorney

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*Counsel for Roswell Solar, LLC*

Dated: April 15, 2016

**CERTIFICATE OF SERVICE**

I, Gunnar Birgisson, hereby certify that I have this day caused the foregoing Application for market-based rate authorization to be served by first-class mail upon the Florida Public Service Commission and the New Mexico Public Service Commission.

Dated at Washington, D.C. this 15th day of April, 2016.

/s/ Gunnar Birgisson

Gunnar Birgisson  
NextEra Energy Resources, LLC  
801 Pennsylvania Ave., N.W.  
Suite 220  
Washington, DC 20004

**ATTACHMENT A**

**TARIFF**

## Roswell Solar, LLC

1. Availability. Roswell Solar, LLC (“Seller”) makes available under this Tariff, Volume No. 1 (the “Tariff”):
  - a) Electric energy and capacity available under this Rate Schedule to any purchaser for resale.
  - b) 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 the 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;
  - c) New York: Seller offers regulation and frequency response service, and operating reserve service (which includes 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. (“NYISO”);
  - d) 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 reserve service) to purchasers within the markets administered by the ISO New England, Inc. (“ISO-NE”);
  - e) 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;
  - f) Midcontinent ISO: 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. (“Midcontinent ISO”) and to others that are self-supplying ancillary services to Midcontinent ISO; and
  - g) 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.
  - h) 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.

2. Applicability. This Tariff is applicable to the following sales by Seller, to the extent such sales are subject to the jurisdiction of the Commission and not made pursuant to another tariff or rate schedule on file with the Commission: (a) all wholesale sales of electric energy and capacity; and (b) all sales into the ancillary service markets described in Section 1 above.
3. Rates. All sales made under this Tariff shall be made at the rates established between the purchaser and Seller.
4. Duration. This Tariff shall continue in effect until terminated or changed and such termination or change becomes effective in accordance with any applicable regulatory requirements.
5. Modifications. Seller may unilaterally apply, under Federal Power Act Section 205 and the regulations promulgated thereunder, to the Commission or other regulatory agency having jurisdiction for a modification of this Tariff.
6. Other Terms and Conditions. All other terms and conditions shall be established by agreement between the purchaser and Seller.
7. Compliance with Commission Regulations. Seller shall comply with the provisions of 18 C.F.R. 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 C.F.R. 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.



8. Limitations and Exemptions Regarding Market-Based Rate Authority.

Seller has authorization for the following waivers:

- Waiver of requirements of Parts 41, 101, and 141, except Sections 141.14 and 141.15;
- Waiver of the reporting requirements of Subparts B and C of Part 35, except Sections 35.12(a), 35.13(b), 35.15, and 35.16; and
- Blanket authorization under Part 34 of all future issuances of securities and assumption of liability.

Notwithstanding the Applicability under Section 2 above, with regard to non-affiliated persons or entities, Seller shall not make wholesale sales of energy or capacity to, or purchases of energy or capacity from, peninsular Florida without first receiving advance approval by the Federal Energy Regulatory Commission pursuant to a separate filing under Section 205 of the Federal Power Act. *See Roswell Solar, LLC*, Docket No. ER16-\_\_\_\_-000.

9. Seller Category: Seller is a Category 2 seller in the SPP Region, and is a Category 1 seller in the Northeast, Southeast, Northwest, Southwest, and Central Regions, as defined in 18 CFR 35.36(a).
10. Effective Date. This Tariff shall become effective on the date specified by the Commission.

## **APPENDIX A**

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

<b>Roswell Solar, LLC</b>	)	<b>Docket No. ER16-___-000</b>
<b>Chaves County Solar, LLC</b>	)	<b>Docket No. ER16-___-000</b>

**AFFIDAVIT OF  
JULIE R. SOLOMON**

**I. INTRODUCTION**

My name is Julie R. Solomon. I am a Managing Director of Navigant Consulting, Inc. My business address is 1200 19<sup>th</sup> Street, N.W., Suite 700, Washington, DC 20036. A large portion of my consulting activities involves electric utility industry restructuring and the transition from regulation to competition. I have been involved extensively in consulting on market power issues concerning mergers, other asset transactions and market-based rate applications. I have filed a number of affidavits before the Federal Energy Regulatory Commission (the “Commission”) in connection with electric utility mergers, the purchase and sale of jurisdictional assets, applications for market-based rates, and triennial updates. Among these, I submitted affidavits on behalf of certain affiliates of Florida Power & Light Company (“FPL”) and NextEra Energy Resources, LLC (“NextEra Resources”) in connection with their triennial filings and market-based rate applications. My resume is attached as Exhibit JRS-1.

I have been asked by counsel for Roswell Solar, LLC (“Roswell Solar”) and Chaves County Solar, LLC (“Chaves County”) (collectively, “Applicants” or “Sellers”) to perform an analysis of market power in connection with their applications for market-based rates. My analysis is consistent with the Commission’s guidelines contained in *Order No. 697*.<sup>1</sup> Here I provide an evaluation of

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<sup>1</sup> *Market-Based Rates for Wholesale Sales of Elec. Energy, Capacity and Ancillary Servs. by Pub. Utils.*, Order No. 697, FERC Stats. & Regs. ¶ 31,252, *clarified*, 121 FERC ¶ 61,260 (2007) (“*Clarification Order*”), *order on reh’g and clarification*, Order No. 697-A, FERC Stats. & Regs ¶ 31,268, *order on reh’g and clarification*, 124 FERC ¶ 61,055 (“*Order No. 697-A Clarification Order*”), *order on reh’g and clarification*, Order No. 697-B, FERC Stats. & Regs ¶ 31,285 (2008), *order on reh’g and clarification*, Order No. 697-C, FERC Stats. & Regs ¶ 31,291 (2009), FERC Stats. & Regs. ¶ 31,305, *order on clarification*, 131 FERC ¶ 61,021 (2010), *appeal docketed sub nom. Mont. Consumer Counsel v. FERC*, Nos. 08-71827, *et al.* (9th Cir. filed May 1, 2008) (collectively, “*Order No. 697*”) (codified at 18 C.F.R. pt. 35).

horizontal and vertical market power issues for the relevant market in which Applicants will own or control generation facilities, namely the Southwest Power Pool, Inc. (“SPP”).

## II. SUMMARY OF CONCLUSIONS

Based on the analyses discussed herein, I find that, under the Commission’s guidelines, Applicants satisfy the Commission’s horizontal market power screens and do not have vertical market power in the relevant market.

The analyses I have conducted are consistent with *Order No. 697* and related orders. I have performed the two indicative horizontal market power screens required by the Commission, namely a pivotal supplier analysis based on the annual peak demand of the relevant market (“Pivotal Supplier Analysis”) and a market share analysis (“Market Share Analysis”) applied on a seasonal basis for a December 2012-November 2013 study period. Consistent with *Order No. 697*, I examined the relevant default geographic market, where the generation owned or controlled by Applicants is physically located.

Applicants readily pass both the Pivotal Supplier Analysis and the Market Share Analysis in SPP and therefore lack horizontal market power.

Applicants cannot erect barriers to entry. The only transmission Applicants and their affiliates own in the SPP consists of interconnection customer interconnection facilities necessary to interconnect their generation to the grid. Neither Applicants nor their affiliates owns or controls intrastate natural gas transportation in SPP. Neither Applicants nor their affiliates owns or controls any sites for generation capacity development that can be used to create barriers to entry in SPP. Neither Applicants nor their affiliates owns or controls physical sources of coal supplies or controls who may access transportation of coal in SPP. There are no other issues that raise any relevant competitive concerns.

I understand that an affirmative statement on behalf of Applicants and their affiliates is included in the Application that they have not and will not erect barriers to entry.

Thus, Applicants lack both horizontal and vertical market power in the relevant market.

### III. DESCRIPTION OF APPLICANT

Applicants each are wholly-owned, indirect subsidiaries of NextEra Resources.

Roswell Solar will own and operate a 70 MW generation facility located in Chaves County, New Mexico (the “Roswell Solar Facility”), interconnected to Southwestern Public Service Company (“SPS”). The Roswell Solar Facility is expected to produce test power in June 2016. All of the output is committed under a long-term contract to SPS.

Chaves County Solar will own and operate a 70 MW generation facility located in Chaves County, New Mexico (the “Chaves County Solar Facility”), interconnected to Southwestern Public Service Company (“SPS”). The Chaves County Solar Facility is expected to produce test power in September 2016. All of the output is committed under a long-term contract to SPS.

Exhibit JRS-2 provides a list of the generating units owned or controlled by Applicants and their affiliates in SPP.<sup>2</sup> As shown, Applicants and their affiliates own 2,681 MW of generation in SPP. Almost all of that is committed under long-term contracts with unaffiliated third-parties. Applicants’ affiliated uncommitted capacity in SPP is approximately 301 MW.

### IV. HORIZONTAL MARKET POWER

#### Background and Analytic Approach

In *Order No. 697*, the Commission codified a methodology for assessing market power to be used by applicants requesting market-based rate authority under Section 205 of the Federal Power Act or making their required triennial market power update filings. The Commission applies two screens – the Pivotal Supplier Analysis and the Market Share Analysis – intended to demonstrate a lack of horizontal market power. If an entity fails to pass either of the screens, there is a presumption of horizontal market power and further analysis is required.

In *Order No. 697*, the Commission defines the default relevant market as the BAA or the RTO/ISO market, as applicable, where the seller is located.<sup>3</sup> Where a generator is interconnected to

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<sup>2</sup> I have not included generation in first-tier markets, because the Simultaneous Import Limit into SPP is zero. See note 11.

<sup>3</sup> *Order No. 697* at P 231.

a non-affiliate owned transmission system, the only relevant market is the BAA in which the generator is located.<sup>4</sup> Accordingly, the default relevant market for purposes of this application is SPP.

### ***Pivotal Supplier Analysis***

The Pivotal Supplier Analysis seeks to determine if load can be served without an applicant's generation. *Order No. 697* specifies a number of calculations for the Pivotal Supplier screen.<sup>5</sup>

First, Total Uncommitted Supply is calculated based on installed capacity (adjusted for long-term firm purchases and sales) plus imports less the BAA reserve requirement (i.e., operating reserves) less the average daily peak native load for the peak month.

Second, Wholesale Load is calculated based on the difference between the annual peak load (needle peak) for the BAA and the average daily peak native load for the peak month. The average daily peak native load attributed to applicants/sellers also is calculated.

Third, Net Uncommitted Supply is calculated based on the difference between Total Uncommitted Supply and Wholesale Load. Seller's Uncommitted Capacity is based on Seller's Total Installed Capacity less its average daily peak native load.

If Seller's Uncommitted Capacity is less than the Net Uncommitted Supply, the Pivotal Supplier Analysis is passed.

### ***Market Share Analysis***

The Market Share Analysis evaluates, for each of the four seasons, whether the applicant has a dominant position in the market, with dominance defined as a market share in excess of 20 percent.

*Order No. 697* specifies a number of calculations for the market share screen.<sup>6</sup>

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<sup>4</sup> *Id.* at P 232 n.217.

<sup>5</sup> *See* Appendix A, Part I of *Order No. 697*.

<sup>6</sup> *See* Appendix A, Part II of *Order No. 697*.

First, Seller and Affiliate Capacity is calculated based on installed capacity (adjusted for long-term firm purchases and sales) plus imports less planned outages. Non-Affiliate Capacity is calculated in a similar manner.

Second, Capacity Deductions are calculated based on average peak native load in the season (averaged over all days)<sup>7</sup> plus operating reserves, and allocated between Seller and Others.

Third, Seller's Uncommitted Capacity is calculated by subtracting the Capacity Deductions attributed to Seller from Seller and Affiliate Capacity; and Total Competing Supply is calculated by subtracting the Capacity Deductions attributed to others from Non-Affiliate Capacity. Total Seasonal Uncommitted Capacity is the sum of Seller's Uncommitted Capacity and Total Competing Supply.

Finally, Seller's Market Share is calculated as Seller's Uncommitted Capacity as a percent of Total Seasonal Uncommitted Capacity.

If Seller's Market Share is less than 20 percent in all seasons, the Market Share Analysis is passed.

### **Assumptions**

Relevant Geographic Market. SPP is the only relevant geographic market.

Study Period. My analysis is based on a December 2012-November 2013 study period. The *Clarification Order* indicates that the study period for new market-based rate applications "should rely on the same vintage data that were used in the triennial reviews filed by the transmission owners in their region within the past year."<sup>8</sup> Transmission owners in the SPP made their triennial filings in June 2015, based on a December 2012-November 2013 study period, and I use the same period in my analysis.

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<sup>7</sup> Consistent with the *Clarification Order*, 121 FERC ¶ 61,260 (2007) I used the following seasons for my analysis: Winter (December-February), Spring (March-May), Summer (June-August) and Fall (September-November).

<sup>8</sup> *Id.*, at 12(d).

SPP Study. For my analysis, I relied primarily on information prepared by SPP at the request of its member Transmission Owners to compile data consistent with Order No. 697 on an aggregate basis for SPP. The SPP information includes data on generating capacity, long-term purchases and sales, operating reserves, planned outages, and load. The SPP submitted a report providing these data in Docket No. AD10-2 on June 30, 2015.<sup>9</sup> The report was been filed as eLibrary accession no. 20150706-0007. This same data was used for the indicative screens in the market-based rate application of Applicants' affiliate, Cedar Bluff Wind, LLC.<sup>10</sup>

Simultaneous Import Limits ("SIL"). The Commission has determined that the SIL into SPP is zero.<sup>11</sup> Thus, I assign zero imports to Applicants and Non-Affiliates. (Applicants do not have any firm transmission reservations into SPP from outside of SPP.)

### **Results of Analysis**

Exhibit JRS-3 presents the results of the Pivotal Supplier Analysis and Exhibit JRS-4 presents the results of the Market Share Analysis, consistent with *Order No. 816*. Below I summarize results of the Pivotal Supplier and Market Share Analyses.

Pivotal Supplier Analysis. Applicants' Installed Capacity in SPP is 2,621 MW, and their Long-Term Firm Sales are 2,520 MW. Thus, Sellers' Uncommitted Capacity is 101 MW. Net Uncommitted Supply is 36,022 MW.

Because Sellers' Uncommitted Capacity is less than the Net Uncommitted Supply, the Pivotal Supplier Screen is passed. See Exhibit JRS-3.

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<sup>9</sup> On September 3, 2015, SPP made a supplemental filing providing additional information requested by staff with respect to "long-term firm reservations that were considered in the study process." Supplement to Informational Filing of 2015 Simultaneous Import Limit Study for SPP Region of Southwest Power Pool, Inc. under AD10-2, September 3, 2015.

<sup>10</sup> *Cedar Bluff Wind, LLC*, Docket No. ER15-2676-000, Market-based rate application, Accepted by Letter Order Dated November 13, 2015.

<sup>11</sup> *Appalachian Power Company*, Order Accepting Updated Market Power Analysis and Simultaneous Transmission Import Limit Values For The Southwest Power Pool Region, 153 FERC ¶ 61,318 at P15 (2015).



Market Share Analysis. Applicants' Installed Capacity is 2,621 MW, and their Long-Term Firm Sales are 2,520 MW. Thus, Sellers' Uncommitted Capacity is 101 MW. Total Seasonal Uncommitted Capacity ranges from 33,911 MW to 43,641 MW.

Sellers' Market Share ranges from 0.2 to 0.3 percent. Because Sellers' Market Share is less than 20 percent in all seasons, the Market Share Screen is passed. See Exhibit JRS-4.

Thus, on the basis of the Commission's screens, Applicants do not have horizontal market power in SPP.

## **V. VERTICAL MARKET POWER**

### **Transmission**

The only transmission owned by Applicants and their affiliates in SPP consists of transmission necessary to connect generation to the grid.

### **Barriers to Entry**

Neither Applicants nor their affiliates own or control intrastate natural gas transportation or intrastate natural gas storage, or owns or controls physical sources of coal supplies or controls who may access transportation of coal in SPP. Neither Applicants nor their affiliates own or control any sites for generation capacity development that can be used to erect barriers to entry. There are no other issues that raise any relevant competitive concerns.

I understand that an affirmative statement on behalf of Applicants and their affiliates is included in its submission that they have not and will not erect barriers to entry.

Based on these facts, Applicants have demonstrated a lack of vertical market power.

## **VI. CONCLUSION**

On the basis of the foregoing analysis, Applicants clearly satisfies the Commission's horizontal and vertical market power tests for market-based rate authority. Applicants pass the requisite screens for horizontal market power in relevant markets and do not have vertical market power.

UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION

Roswell Solar, LLC ) Docket No. ER16-\_\_-000  
Chaves County Solar, LLC ) Docket No. ER16-\_\_-000

AFFIDAVIT

District of Columbia

§  
§  
§

JULIE R. SOLOMON being duly sworn, deposes and states: that she prepared the Affidavit and Exhibits of Julie R. Solomon and that the statements contained therein and the Exhibits attached hereto are true and correct to the best of her knowledge and belief.

*Julie R. Solomon*

Julie R. Solomon

SUBSCRIBED AND SWORN TO BEFORE ME, this the 14<sup>th</sup> day of April 2016.

*Janet P. Cashion*  
Notary Public, District of Columbia

Printed Name: Janet P. Cashion

My Commission Expires: July 14, 2017





## Julie R. Solomon

Julie R. Solomon  
Managing Director

Navigant Consulting  
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1200 19th Street NW  
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### Professional History

- Managing Director, Navigant Consulting - 2010-Present
- Vice President, Charles River Associates - 2001-2010
- Senior Vice President, Putnam, Hayes and Bartlett, Inc. and PHB Hagler Bailly, Inc., Washington, DC - 1986-2000
- Economist, Economic Consulting Services, Inc., Washington, DC - 1979-1986
- Economist, U.S. Department of Labor, Washington, DC - 1976-1979

### Education

- M.B.A. Finance, The Wharton School University of Pennsylvania
- B.A. Economics, Connecticut College

### Testimony

- Written testimony provided in more than 150 regulatory proceedings

Julie Solomon is a Managing Director at Navigant Consulting, Inc. in the Energy Practice's Power Systems, Markets & Pricing group. She has more than 20 years of consulting experience, specializing in the areas of regulatory and utility economics, financial analysis and business valuation. Ms. Solomon has participated in analysis of proposed regulatory reforms, supply options and utility industry restructuring in the gas and electric industries. She also has advised utility clients in corporate strategy and corporate restructuring, and consulted to legal counsel on a variety of litigation and regulatory matters, including antitrust litigation and contract disputes. She has filed testimony in numerous proceedings before the Federal Energy Regulatory Commission. Much of her current practice focuses on regulatory and market power issues concerning mergers and acquisitions and compliance filings in the electricity market.

» Advised clients in the electric and gas utility industry on competition issues, including the impact of mergers on competition. Directed a large number of analytic studies relating to obtaining merger approval from regulatory authorities.

» Advised clients in the electric utility industry on restructuring strategies, including potential mergers and acquisitions, functional unbundling and cost savings.

» Consulted in the electric and gas utility industries in a variety of regulatory and competition matters, including rate proceedings, prudence reviews, proposed regulatory reforms, analysis of supply options, privatization and restructuring.

» Advised utility and non-utility clients on many aspects of the competitive independent power industry, including strategic and financial consulting assignments.

» Consulted legal counsel on a variety of litigation matters, including the development of expert testimony on liability issues and the calculation of damages in a variety of industries.

» Provided strategic and economic analyses for clients in trade regulatory proceedings such as dumping and subsidies.

» Provided financial and business valuation analyses in a number of transactions, including fair market value for taxation purposes and valuation of family-owned businesses.



**Julie R. Solomon**

## **Professional Experience**

### *Electric and Gas Utilities*

#### *Mergers and Acquisitions (Market Power and Competition Issues)*

- » Advised clients and conducted analytic studies in connection with a large number of major electric and electric-gas mergers and asset transactions of regulated companies. Provided testimony to FERC for a number of these types of transactions.
- » Advised clients and provided confidential pre-screening analyses for potential mergers and acquisitions.
- » Conducted numerous analytic studies in connection with FERC market-based rate applications and compliance filings for electricity sellers. Provided testimony to FERC for a number of these types of transactions.
- » Conducted numerous analytic studies in connection with FERC market-based rate applications and compliance filings for gas storage facilities. Provided testimony to FERC for a number of these types of transactions.

#### *Utility Restructuring and Stranded Cost*

- » Conducted analytic studies and provided litigation support in connection with state stranded cost proceedings in Ohio (Cincinnati Gas & Electric and Dayton Power & Light); West Virginia (Monongahela Power and Potomac Edison); Maryland (Potomac Edison) and Pennsylvania (West Penn Power).
- » Provided analytic support evaluating the benefits of Public Service of Colorado's proposed DC transmission line between Colorado and Kansas in support of a regulatory proceeding.
- » Assisted in studies relating to privatization of the electricity industry in the United Kingdom, including development of a computer model to simulate electricity dispatch and project future prices, capacity needs and utility revenues under various scenarios. During temporary assignment to London office.
- » Participated in antitrust litigation involving a utility and a cogenerator, including preparation of an expert report on liability and damage issues, preparation of expert witnesses for deposition, and assistance in preparation for depositions of opposing expert and in-house witnesses.
- » Assisted in the valuation of the interests of several firms in various cogeneration projects for the purpose of combining these interests into a new entity or selling interests to third parties.
- » Analyzed the financial feasibility and viability of a large number of cogeneration projects, assisted in the preparation of presentations and filings and presented testimony to the relevant public utility commission. Ms. Solomon also assisted in the development of a PC-based financial model to analyze various cogeneration projects.



**Julie R. Solomon**

- » Participated in a study to analyze the financial effects of a variety of restructuring options for a utility, including transfer and/or sale of assets and subsequent sale-leasebacks, and debt restructuring alternatives. In addition, she developed a PC-based financial model with applications to utility restructuring plans.
- » Provided litigation support in major utility rate proceedings, including assisting in the preparation of responses to interrogatories and data requests, preparation of company and outside expert witnesses for deposition and hearings, and assistance in the deposition and cross-examination of intervenor witnesses.
- » Participated in proceedings involving regulation of an oil pipeline, which included evaluating the business risks faced by the company.

***Business Valuation***

- » Participated in a valuation study involving the fair market value of a privately held company for purposes of an IRS proceeding.
- » Participated in a valuation study in a divorce proceeding, where the assets being valued included a privately held business.
- » Participated in two strategic engagements that developed business plans and identified potential acquisition candidates for the client.
- » Provided advice to a client concerning the benefits and potential risks of developing a partnership with a competitor.



**Julie R. Solomon**

### **Testimony or Expert Report Experience (2012-Mar 2015)**

- » Affidavit on behalf of Grande Prairie Wind, LLC, Docket No. ER16-1258, application for market-based rates, March 22, 2016.
- » Affidavit on behalf of Florida Power & Light Company, Docket No. ER16-628-001, application for market-based rates, March 21, 2016.
- » Affidavit on behalf of Essential Power, LLC, Docket No. ER16-82, application for authorization of disposition of jurisdictional facilities, February 29, 2016.
- » Affidavit on behalf of Duke Energy Florida, LLC, Docket No. ER16-69, application for authorization of disposition of jurisdictional facilities, February 10, 2016.
- » Affidavit on behalf of Nassau Energy, LLC, Docket No. ER16-806, application for market-based rates, January 21, 2016.
- » Affidavit on behalf of ECP MBR Sellers, Docket No. ER16-72, market-based rate triennial filing, December 31, 2015.
- » Affidavit on behalf of SDG&E Sellers, Docket No. ER14-474, market-based rate triennial filing, December 30, 2015.
- » Affidavit on behalf of New Harquahala Generating Company, Docket No. ER15-2013, market-based rate triennial filing, December 30, 2015.
- » Affidavit on behalf of Exelon SPP Entities, Docket No. ER14-474, market-based rate triennial filing, December 29, 2015.
- » Affidavit on behalf of Florida Power & Light Company, Docket No. ER16-628-000, application for market-based rates, December 23, 2015.
- » Affidavit on behalf of ENGIE Portfolio Management, LLC et al, Docket No. ER16-581 et al., application for market-based rates, December 18, 2015.
- » Affidavit on behalf of Marshall Wind Energy, LLC, Docket No. ER16-438, market-based rate triennial filing, December 18, 2015.
- » Affidavit on behalf of Marshall Wind Energy, LLC, Docket No. ER16-438, application for market-based rates, December 1, 2015.
- » Affidavit on behalf of Calpine Granite Holdings, LLC, Docket No. EC16-19, application for authorization of disposition of jurisdictional facilities, October 27, 2015.
- » Affidavit on behalf of Berkshire Hathaway, Inc., Docket No. EC16-10, application for authorization of disposition of jurisdictional facilities, October 8, 2015.
- » Affidavit on behalf of Panda Patriot, LLC, Docket No. ER15-2472, application for market-based rates, September 29, 2015.
- » Affidavit on behalf of Talen Energy Corporation, Docket No. EC14-112, Motion to Amend Mitigation Plan, September 25, 2015.



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- » Affidavit on behalf of BHE MBR Sellers, Docket No. ER12-162, notification of change in status, September 25, 2015.
- » Affidavit on behalf of Talen Energy Corporation, Docket No. EC14-112, Motion to Amend Mitigation Plan, September 8, 2015.
- » Affidavit on behalf of BHE MBR Sellers, Docket No. ER13-521, response to Commission Staff Deficiency Letter and Request for Additional Information, September 24, 2015.
- » Affidavit on behalf of BHE MBR Sellers, Docket No. ER13-521, supplemental filing, September 8, 2015.
- » Affidavit on behalf of GDF SUEZ MBR Sellers, Docket No. ER14-1699, notice of change, August 31, 2015.
- » Affidavits on behalf of PacifiCorp and NV Energy, Docket No. ER15-2283, EIM analysis, July 27, 2015.
- » Affidavit on behalf of NorthWestern Corporation and Beethoven Wind, LLC, Docket No. EC15-176, application for authorization of disposition of jurisdictional facilities, July 24 2015.
- » Affidavit on behalf of MidAmerican Energy Services, LLC, Docket No. ER15-2211, application for market-based rates, July 24, 2015.
- » Affidavit on behalf of The Empire District Electric Company, Docket No. ER10-2738, market-based rate triennial filing, June 30, 2015.
- » Affidavit on behalf of Exelon MBR Sellers, Docket No. ER10-2172 *et al.*, market-based rate triennial filing, June 30, 2015.
- » Affidavit on behalf of Oklahoma Gas & Electric, Docket No. ER11-2105, market-based rate triennial filing, June 30, 2015.
- » Affidavit on behalf of LG&E Energy Marketing, Inc., Docket No. ER10-1714, market-based rate triennial filing, June 30, 2015.
- » Affidavit on behalf of Westar Energy, Inc., Docket No. ER10-2507, market-based rate triennial filing, June 29, 2015.
- » Affidavit on behalf of the Alabama Power Company, *et al.*, Docket No. EL15-39, *et al.*, response to show cause order, June 26, 2015.
- » Affidavit on behalf of Wisconsin Electric Power Company, Docket No. ER15-2019 market-based rate triennial filing, June 26, 2015.
- » Affidavit on behalf of Panda Liberty LLC, Docket No. ER15-1841, market-based rate application, June 2, 2015.
- » Affidavit on behalf of CCI U.S. Asset Holdings LLC, Docket No. EC15-108, application for authorization of disposition of jurisdictional facilities, March 31, 2015.
- » Affidavit on behalf of Florida Power & Light Company, Docket No. EC15-102, application for authorization of disposition of jurisdictional facilities, March 23, 2015.



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- » Affidavit on behalf of Osprey Energy Center, LLC, Docket No. EC15-96, application for authorization of disposition of jurisdictional facilities, March 13, 2015.
- » Affidavit on behalf of the Berkshire Hathaway Energy MBR Sellers, Docket No. EL15-22, *et al.*, response to show cause order, February 9, 2015.
- » Affidavit on behalf of ECP MBR Sellers, Docket No. ER13-2477, notice of change in status, January 20, 2015.
- » Affidavit on behalf of NorthWestern Corporation, Docket No. ER11-1859, market-based rate triennial filing, December 30, 2014.
- » Affidavit on behalf of Exelon, Docket No. ER12-2178, market-based rate triennial filing, December 23, 2014.
- » Affidavit on behalf of Dynegy Inc., Docket No. ER14-1569, market-based rate triennial filing, December 23, 2014.
- » Affidavit on behalf of Northern Indiana Public Service, Docket No. ER10-1781, market-based rate triennial filing, December 23, 2014.
- » Affidavit on behalf of AES Corp, Docket No. ER10-3415, market-based rate triennial filing, December 22, 2014.
- » Affidavit on behalf of Ameren Illinois Company, Union Electric Company, and AmerenEnergy Medina Valley Cogen, L.L.C. Docket No. ER10-1119, ER10-1123, and ER10-1103, market-based rate triennial filing, December 19, 2014.
- » Affidavit on behalf of Duke Energy MBR Sellers, Docket No. ER10-1325, market-based rate triennial filing, December 19, 2014.
- » Affidavit on behalf of Duke Energy Progress, Inc., Docket No. EC15-9, application for authorization of disposition of jurisdictional facilities, October 10, 2014.
- » Comments of Julie R. Solomon and Matthew E. Arenchild regarding NOPR on market-based rate authority, Docket No. RM14-14, September 23, 2014.
- » Affidavit on behalf of Dynegy Resource I, LLC, Docket No. EC14-141, application for authorization of disposition of jurisdictional facilities, September 11, 2014.
- » Affidavit on behalf of Dynegy Inc., Docket No. EC14-140, application for authorization of disposition of jurisdictional facilities, September 11, 2014.
- » Affidavit on behalf of Calpine Fore River Energy Center, LLC, Docket No. EC14-135, application for authorization of disposition of jurisdictional facilities, September 5, 2014.
- » Affidavit on behalf of Seiling Wind, LLC; Seiling Wind II, LLC; Mammoth Plains Wind Project, LLC; and Palo Duro Wind Energy, LLC, Docket No. ER14-2707-10, market-based rate applications, August 26, 2014.
- » Affidavit on behalf of ECP MBR Sellers, Docket No. ER10-2302, notification of change in status, August 18, 2014.





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- » Affidavit on behalf of Millennium Power Partners, L.P., Docket No. ER10-3286, notification of change in status, August 4, 2014.
- » Affidavit on behalf of Granite Acquisition, Inc., Docket No. EC14-125, application for authorization of disposition of jurisdictional facilities, August 15, 2014.
- »
- »
- »
- » Testimony (Direct and Rebuttal), on behalf of Duke Energy Florida, Inc., Docket No. 140111-EI before the Florida Public Service Commission, Petition for Determination of Cost Effective Generation Alternative to Meet Need Prior to 2018, May 27, 2014 and August 5, 2014.
- » Affidavit on behalf of LS Power Development, LLC, Docket No. ER13-2318, notification of change in status, August 4, 2014.
- » Supplemental Affidavit on behalf of Powerex Corp., Docket No. ER11-2664, market-based rate triennial filing, July 25, 2014.
- » Supplemental Affidavit on behalf of Berkshire Hathaway Energy, Docket No. ER13-1266, notification of change in status, August 17, 2014.
- » Affidavit on behalf of RJS Power Holdings LLC and PPL Corporation, Docket No. EC14-112, application for authorization of disposition of jurisdictional facilities, July 15, 2014.
- » Affidavit on behalf of South Carolina Electric & Gas Company, Docket No. ER10-2498, market-based rate triennial filing, July 14, 2014.
- » Affidavit on behalf of Consumers Energy Company, Docket No. EC14-110, application for authorization of disposition of jurisdictional facilities, July 1, 2014.
- » Affidavit on behalf of J.P. Morgan Sellers, Docket No. ER10-2331, market-based rate triennial filing, June 30, 2014.
- » Affidavit on behalf of Duke Energy MBR Sellers, Docket No. ER10-1325, market-based rate triennial filing, June 30, 2014.
- » Affidavit on behalf of PPL Southeast Companies, Docket No. ER10-1511, market-based rate triennial filing, June 30, 2014.
- » Affidavit on behalf of NextEra Companies, Docket No. ER10-1852, market-based rate triennial filing, June 30, 2014.
- » Affidavit on behalf of NextEra Companies, Docket No. ER10-1838, market-based rate triennial filing, June 30, 2014.
- » Affidavit on behalf of Brookfield Companies, Docket No. ER11-2292, market-based rate triennial filing, June 30, 2014.
- » Affidavit on behalf of Calpine Corp, Docket No. ER10-1944, market-based rate triennial filing, June 30, 2014.



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- » Affidavit on behalf of LS Northeast MBR Sellers, Docket No. ER13-2318, market-based rate triennial filing, June 30, 2014.
- » Affidavit on behalf of GDF SUEZ Northeast MBR Sellers, Docket No. ER10-2670, market-based rate triennial filing, June 30, 2014.
- » Affidavit on behalf of Safe Harbor Water Power Corp., Docket No. ER13-395, market-based rate triennial filing, June 27, 2014.
- » Affidavit on behalf of ECP MBR Sellers, Docket No. ER13-2477, market-based rate triennial filing, June 23, 2014.
- » Affidavit on behalf of Rockland Sellers, Docket No. ER12-1436, market-based rate triennial filing and notification of change in status, June 19, 2014.
- » Affidavit on behalf of Exelon Corp and Pepco Holdings, Inc., Docket No. EC14-96, application for authorization of disposition of jurisdictional facilities, May 30, 2014.
- » Affidavit on behalf of Nevada Power Co and Nevada Sun-Peak Limited Partnership, Docket No. EC14-83, application for authorization of disposition of jurisdictional facilities, May 2, 2014.
- » Affidavit on behalf of Nevada Power Co and Las Vegas Cogeneration Limited Partnership, Docket No. EC14-84, application for authorization of disposition of jurisdictional facilities, May 2, 2014.
- » Affidavit on behalf of NatGen Southeast Power LLC, Docket No. EC14-81, application for authorization of disposition of jurisdictional facilities, April 28, 2014.
- » Surrebuttal Testimony on Behalf of Commonwealth Edison Company, Illinois Commerce Commission, Application for a Certificate of Public Convenience and Necessity, No. 13-0657, April 9, 2014.
- » Affidavit on behalf of KMC Thermo, LLC, Docket No. ER14-1468, market-based rate application, March 12, 2014.
- » Affidavit on behalf of Trailstone Power, LLC, Docket No. ER14-1439, market-based rate application, March 6, 2014.
- » Affidavit on behalf of MACH Gen, LLC et al., Docket No. EC14-61, application for authorization of disposition of jurisdictional facilities, March 4, 2014.
- » Affidavit on behalf of MidAmerican Geothermal, LLC, et al., Docket No. EC14-59, application for authorization of disposition of jurisdictional facilities, February 20, 2014.
- » Affidavit on behalf of Green Mountain Power Corporation, Docket No. ER11-1933, market-based rate triennial filing, February 7, 2014.
- » Affidavit on behalf of NorthWestern Corporation, et al., Docket No. EC14-41, application for authorization of disposition of jurisdictional facilities, January 10, 2014.
- » Affidavit on behalf of NorthWestern Corporation, Docket No. ER11-1858, notification of change in status, January 10, 2014.



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- » Affidavit on behalf of MidAmerican Energy, Docket No. ER10-2475, notification of change in status, January 2, 2014.
- » Affidavit on behalf of Powerex Corp., Docket No. ER11-2664, market-based rate triennial filing, December 31, 2013.
- » Affidavit on behalf of TransAlta, Docket No. ER10-2847, market-based rate triennial filing, December 31, 2013.
- » Affidavit on behalf of Duquesne Light Company, Docket No. ER10-1910, market-based rate triennial filing, December 31, 2013.
- » Affidavit on behalf of Constellation Energy Nuclear Group, Docket No. ER10-2179, market-based rate triennial filing, December 30, 2013.
- » Affidavit on behalf of Exelon, Docket No. ER12-2178, market-based rate triennial filing, December 30, 2013.
- » Affidavit on behalf of Dominion, Docket No. ER13-434, market-based rate triennial filing, December 30, 2013.
- » Affidavit on behalf of Brookfield Companies, Docket No. ER10-2895, market-based rate triennial filing, December 30, 2013.
- » Affidavit on behalf of Oklahoma Gas & Electric, Docket No. ER14-882, notification of change in status/tariff filing, December 30, 2013.
- » Affidavit on behalf of AES Corp, Docket No. ER10-3415, market-based rate triennial filing, December 26, 2013.
- » Affidavit on behalf of JPMorgan, Docket No. ER10-2331, market-based rate triennial filing, December 23, 2013.
- » Affidavit on behalf of Northeast Utilities, Docket No. ER10-1801, market-based rate triennial filing, December 20, 2013.
- » Affidavit on behalf of Iberdrola, Docket No. ER10-2822, market-based rate triennial filing, December 20, 2013.
- » Affidavit on behalf of PHI, Docket No. ER10-2997, market-based rate triennial filing, December 20, 2013.
- » Affidavit on behalf of Essential Power, Docket No. ER12-952, market-based rate triennial filing, December 20, 2013.
- » Affidavit on behalf of Empire District, Docket No. ER14-793, notification of change in status/tariff filing, December 20, 2013.
- » Affidavit on behalf of Westar Energy, Inc., Docket No. ER14-724, notification of change in status/tariff filing, December 19, 2013.
- » Affidavit on behalf of Alpha Gen Power, LLC, Docket No. ER14-630, market-based rate application, December 16, 2013.



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- » Affidavit on behalf of Black Bear Hydro Partners, LLC, Docket No. EC14-28, application for authorization of disposition of jurisdictional facilities, November 14, 2013.
- » Affidavit on behalf of Sierra Pacific Power Company, Docket No. ER10-2474, notification of change in status, November 4, 2013.
- » Affidavit on behalf of ECP, Docket No. ER11-3859, notification of change in status, September 30, 2013.
- » Affidavit on behalf of Steele Flats Wind Project, LLC, Docket No. ER13-2474, market-based rate application, September 27, 2013.
- » Affidavit on behalf of Tuscola Wind II, LLC, Docket No. ER13-2458, market-based rate application, September 26, 2013.
- » Affidavit on behalf of Pheasant Run Wind, LLC and Pheasant Run Wind II, LLC, Docket Nos. ER13-2461-2, market-based rate applications, September 26, 2013.
- » Affidavit on behalf of TPF II and USPG Holdings, LLC, Docket No. EC13-154, application for authorization of disposition of jurisdictional facilities, September 25, 2013.
- » Affidavit on behalf of Seneca Generation, LLC et al., Docket Nos. ER13-2316-9, market-based rate applications, September 4, 2013.
- » Affidavit on behalf of Seneca Generation, LLC et al., Docket No. EC13-143, application for authorization of disposition of jurisdictional facilities, September 4, 2013.
- » Supplemental Affidavit on behalf of MidAmerican Energy (Silver Merger Sub, Inc.), Docket No. EC13-128, application for authorization of disposition of jurisdictional facilities, August 17, 2013.
- » Affidavit on behalf of Desert Sunlight 250, LLC and Desert Sunlight 300, LLC, Docket Nos. ER13-1991-2, market-based rate applications, July 17, 2013.
- » Affidavit on behalf of MidAmerican Energy (Silver Merger Sub, Inc.), Docket No. EC13-128, application for authorization of disposition of jurisdictional facilities, July 12, 2013.
- » Affidavit on behalf of Calpine Southwest MBR Sellers, Docket No. ER10-1942, market-based rate triennial filing, July 1, 2013.
- » Affidavit on behalf of NextEra Companies, Docket No. ER10-1847, market-based rate triennial filing, July 1, 2013.
- » Affidavit on behalf of Wayzata Entities, Docket No. ER10-1777, market-based rate triennial filing, July 1, 2013.
- » Affidavit on behalf of AES MBR Affiliates, Docket No. ER10-3415, market-based rate triennial filing, July 1, 2013.
- » Affidavit on behalf of Sierra Pacific Power Company, *et al.* under ER10-2474, Docket No. ER10-24744, market-based rate triennial filing, July 1, 2013.
- » Affidavit on behalf of NorthWestern Corporation, Docket No. ER11-1858, market-based rate triennial filing, July 1, 2013.



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- » Affidavit on behalf of SGOC Southwest MBR Sellers, Docket No. ER10-2864, market-based rate triennial filing, June 28, 2013.
- » Affidavit on behalf of GWF Energy LLC, et al. Docket No. ER10-3301, market-based rate triennial filing, June 28, 2013.
- » Affidavit on behalf of NV Energy, Inc., application for approval of internal reorganization, Docket No. EC13-113, May 31, 2013.
- » Affidavit on behalf of Midwest Generation, LLC, Docket No. EC13-103, application for authorization of disposition of jurisdictional facilities, May 6, 2013.
- » Affidavit of behalf of Nevada Power Company (with Matthew E. Arenchild), Docket No. EC13-96, application for authorization of disposition of jurisdictional facilities, April 17, 2013.
- » Affidavit of behalf of Dynegy Inc., Docket No. EC13-93, application for authorization of disposition of jurisdictional facilities, April 16, 2013.
- » Application on behalf of Florida Power & Light Company, Docket No. EC13-91, application for authorization of disposition of jurisdictional facilities, April 12, 2013.
- » Affidavit on behalf of Blythe Energy LLC, et al., Docket No. EC13-89, application for authorization of disposition of jurisdictional facilities, April 2, 2013.
- » Affidavit on behalf of New Harquahala Generating Company, LLC, Docket No. ER10-3310, market-based rate triennial filing, March 29, 2013.
- » Affidavit on behalf of Dominion Energy Brayton Point, et al., Docket No. EC13-82, application for authorization of disposition of jurisdictional facilities, March 21, 2013.
- » Affidavit on behalf of Duke Energy Carolinas, LLC et al., Docket No. ER10-2566, et al., notice of change in status, January 29, 2013.
- » Affidavit on behalf of CCI Roseton LLC, Docket No. ER13-773, market-based rate application, January 17, 2013.
- » Affidavit on behalf of CCI Roseton LLC, Docket No. EC13-63, application for authorization of disposition of jurisdictional facilities, January 16, 2013.
- » Affidavit on behalf of Calpine Oneta Power, LLC, Docket No. ER11-3777, et al., market-based rate triennial filing, December 31, 2012.
- » Affidavit on behalf of NextEra Energy Companies, Docket No. ER12-569, et al., market-based rate triennial filing, December 27, 2012.
- » Affidavit on behalf of Nevada Power Company, Docket No. ER10-2474, market-based rate triennial filing, December 26, 2012.
- » Testimony on behalf of Powerex Corp re Puget Sound Energy, Inc v. All Jurisdictional Sellers of Energy & Capacity, Docket No. EL01-10, December 17, 2012.
- » Affidavit on behalf of AES Beaver Valley, LLC, Docket No. ER13-442, market-based rate application, November 21, 2012.



**Julie R. Solomon**

- » Affidavit on behalf of Broad River Energy LLC, et al., Docket No. EC13-42, application for authorization of disposition of jurisdictional facilities, November 16, 2012.
- » Affidavit on behalf of Westar Energy, Inc., Docket No. ER10-2507, notice of change in status, October 29, 2012.
- » Affidavit on behalf of Homer City Generation, L.P., Docket No. ER13-55, market-based rate application, October 9, 2012.
- » Affidavit on behalf of Homer City Generation, L.P., et al., Docket No. EC13-9, application for authorization of disposition of jurisdictional facilities, October 9, 2012.
- » Affidavit on behalf of GenOn Marsh Landing, LLC, Docket No. ER12-2545, market-based rate application, August 29, 2012.
- » Affidavit on behalf of High Mesa Energy, LLC, Docket No. ER12-2528, market-based rate application, August 27, 2012.
- » Affidavit on behalf of Brandon Shores LLC, et al., Docket No. EC12-137, application for authorization of disposition of jurisdictional facilities, August 23, 2012.
- » Affidavit on behalf of North Sky River Energy, LLC, Docket No. ER12-2444, market-based rate application, August 14, 2012.
- » Affidavit on behalf of Duke Energy Carolinas, LLC et al., Docket No. ER10-2566, et al., notice of change in status, August 1, 2012.
- » Affidavit on behalf of Canandaigua Power Partners, LLC et al., Docket No. ER10-2460, notice of change in status, July 16, 2012.
- » Affidavit on behalf of Limon Wind I and Limon Wind II, LLC, Docket Nos. ER12-2225 and -2226, market-based rate application, July 10, 2012.
- » Affidavit on behalf of Ensign Wind, LLC, Docket No. ER12-2227, market-based rate application, July 10, 2012.
- » Affidavit on behalf of NextEra Energy Companies, Docket No. ER10-1836, et al., market-based rate triennial filing, July 2, 2012.
- » Affidavit on behalf of Iberdrola Renewables, LLC, et al., Docket No. ER10-2994, et al., market-based rate triennial filing, June 29, 2012.
- » Affidavit on behalf of The Empire District Electric Company, Docket No. ER10-2738, market-based rate triennial filing, June 29, 2012.
- » Affidavit on behalf of Wisconsin Electric Power Company, Docket No. ER10-2563, market-based rate triennial filing, June 29, 2012.
- » Affidavit on behalf of Baltimore Gas and Electric Company, et al., Docket No. ER10-2172, et al., market-based rate triennial filing, June 29, 2012.
- » Affidavit on behalf of Westar Energy, Inc., Docket No. ER12-2124, market-based rate triennial filing, June 28, 2012.



**Julie R. Solomon**

- » Affidavit on behalf of Duke Energy Beckjord, LLC, et al., Docket No. ER12-1946 et al., market-based rate application, June 5, 2012.
- » Affidavit on behalf of Minco Wind III, LLC, Docket No. ER12-1880, market-based rate application, May 31, 2012.
- » Affidavit on behalf of Tuscola Bay Wind, LLC, Docket No. ER12-1660, market-based rate application, April 30, 2012.
- » Affidavit on behalf of Powerex Corp., Docket No. ER11-2664, notice of change in status, April 13, 2012.
- » Affidavit on behalf of Safe Harbor Water Power Corporation, Docket No. ER11-2780, notice of change in status, April 11, 2012.
- » Affidavit on behalf of Hot Spring Power Company, LLC, Docket No. EC12-87, application for authorization of disposition of jurisdictional facilities, March 28, 2012.
- » Affidavit on behalf of High Majestic Wind II, LLC, Docket No. ER12-1228, market-based rate application, March 8, 2012.
- » Affidavit on behalf of Duke Energy Indiana, Inc. et al., Docket No. ER10-2034 et al., notice of change in status, January 31, 2012.
- » Affidavit on behalf of CPV Cimarron Renewable Energy Company, LLC, Docket No. ER12-775, market-based rate application, January 6, 2012.
- » Affidavit on behalf of LS Power Marketing, LLC, et al., Docket No. ER10-2739, et al., market-based rate triennial filing, January 3, 2012.
- » Affidavit on behalf of Auburndale Peaker Energy Center, LLC, et al., Docket No. ER10-1945, et al., market-based rate triennial filing, January 3, 2012.

## Generation

**Generation Affiliated with Roswell Solar, LLC and Chaves County Solar, LLC in SPP**

	Plant Name	Capacity Ratings (MW)		Uncommitted
		Summer	Winter	Capacity (MW)
<b>SPP</b>				
<b>SPP</b>	Roswell Solar	70.0	70.0	-
<b>SPP</b>	Chaves County Solar	70.0	70.0	-
SPP	Cedar Bluff Wind	200.0	200.0	-
SPP	Breckinridge Wind	98.1	98.1	-
SPP	Seiling Wind	200.0	200.0	-
SPP	Seiling Wind II	100.0	100.0	-
SPP	Mammoth Plains Wind	200.0	200.0	-
SPP	Palo Duro Wind	263.0	263.0	-
SPP	Blackwell Wind	59.8	59.8	-
SPP	Cimarron Wind	165.6	165.6	-
SPP	Cowboy Wind (Weatherford)	147.0	147.0	-
SPP	Elk City	98.9	98.9	-
SPP	Elk City II	100.8	100.8	100.8
SPP	Ensign Wind	98.9	98.9	-
SPP	Gray County	112.0	112.0	-
SPP	High Majestic II	79.6	79.6	-
SPP	High Majestic	79.5	79.5	-
SPP	Minco Wind	99.2	99.2	-
SPP	Minco Wind II	100.8	100.8	-
SPP	Minco Wind III	100.8	100.8	-
SPP	Oklahoma Wind	51.0	51.0	-
SPP	Sooner Wind	51.0	51.0	-
SPP	Steele Flats	75.0	75.0	-
<b>Total SPP</b>		<b>2,621.0</b>	<b>2,621.0</b>	<b>100.8</b>



Part I – Pivotal Supplier Analysis

20160415-5273 FERC PDF (Unofficial) 4/15/2016 4:11:16 PM  
 Applicant-> NextEra  
 Market-> SPP  
 Data Year -> Dec 2012-Nov 2013

Row	Generation	Reference	
<b>Seller and Affiliate Capacity (owned or controlled)</b>			
A	Installed Capacity (from inside the study area)	2,621	Generation
A1	Remote Capacity (from outside the study area)	-	
B	Long-Term Firm Purchases (from inside the study area)	-	
B1	Long-Term Firm Purchases (from outside the study area)	-	
C	Long-Term Firm Sales (in and outside the study area)	2,520	Generation
D	Uncommitted Capacity Imports	-	153 FERC ¶ 61,318 (2015) (SPP SIL is zero)
<b>Non-Affiliate Capacity (owned or controlled)</b>			
E	Installed Capacity (from inside the study area)	82,867	Wkp-SPP Report, less Row A (plus Roswell Solar, Chaves County Solar and Cedar Bluff Wind)
E1	Remote Capacity (from outside the study area)	-	
F	Long-Term Firm Purchases (from inside the study area)	2,520	Offset Row C
F1	Long-Term Firm Purchases (from outside the study area)	3,592	Wkp-SPP Report
G	Long-Term Firm Sales (in and outside the study area)	5,308	Wkp-SPP Report
H	Uncommitted Capacity Imports	-	153 FERC ¶ 61,318 (2015) (SPP SIL is zero)
I	Study Area Reserve Requirement	1,074	Wkp-SPP Report
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)	43,194	
<b>Load</b>			
L	Balancing Authority Area Annual Peak Load	46,676	Wkp-SPP Report
M	Average Daily Peak Native Load in Peak Month	39,504	Wkp-SPP Report
N	Amount of Line M Attributable to Seller, if any	-	
O	Wholesale Load (L-M)	7,172	
P	Net Uncommitted Supply (K-O)	36,022	
Q	Seller's Uncommitted Capacity (A+A1+B+B1+D-C-J-N)	101	
Result of Pivotal Supplier Screen (Pass if Line Q < Line P) (Fail if Line Q > Line P)		Pass	
Total Imports (Sum D,H), as filed by Seller ->		-	
% of SIL for Seller's imported capacity ->		#DIV/0!	zero denominator
% of SIL for Other's imported capacity ->		#DIV/0!	zero denominator
SIL value ->		-	SIL is zero
Do Total Imports exceed the SIL value? ->		No	

SPP Report: Southwest Power Pool, Inc., Docket No. AD10-02-15, Filed June 30, 2015, "Informational Filing of 2015 Simultaneous Import Limit Study for SPP Region".

See, also, Cedar Bluff Wind, LLC, Docket No. ER15-2676-000, Market-based rate application, Accepted by Letter Order Dated November 13, 2015.

**Part II – Market Share Analysis**

Applicant-> **NextEra**  
 Study Area -> **SPP**  
 Data Year -> **Dec 2012-Nov 2013**

As filed by the Applicant/Seller

Row E	Winter (MW)	Spring (MW)	Summer (MW)	Fall (MW)	Reference
<b>Seller and Affiliate Capacity (owned, controlled or under LT contract)</b>					
A	2,621	2,621	2,621	2,621	Generation
A1	-	-	-	-	
B	-	-	-	-	
B1	-	-	-	-	
C	2,520	2,520	2,520	2,520	Generation
D	-	-	-	-	Conservatively assumed to be zero
E	-	-	-	-	153 FERC ¶ 61,318 (2015) (SPP SIL is zero)
<b>Capacity Deductions</b>					
F	28,757	27,503	38,104	29,608	Wkp-SPP Report
G	-	-	-	-	
H	28,757	27,503	38,104	29,608	
I	1,027	1,301	1,074	1,074	Wkp-SPP Report
J	-	-	-	-	
K	1,027	1,301	1,074	1,074	
<b>Non-Affiliate Capacity (owned, controlled or under LT contract)</b>					
L	70,961	73,568	82,867	73,022	Wkp-SPP Report, less Row A (plus Roswell Solar, Chaves County Solar and Cedar Bluff Wind)
L1	-	-	-	-	
M	2,520	2,520	2,520	2,520	Offset Row C
M1	2,736	2,640	3,592	2,530	Wkp-SPP Report
N	5,658	5,658	5,308	5,317	Wkp-SPP Report
O	6,002	10,455	953	8,129	Wkp-SPP Report
P	-	-	-	-	153 FERC ¶ 61,318 (2015) (SPP SIL is zero)
<b>Supply Calculation</b>					
Q	34,772	33,810	43,540	33,944	
R	101	101	101	101	
S	34,873	33,911	43,641	34,044	
T	0.3%	0.3%	0.2%	0.3%	
	Pass	Pass	Pass	Pass	
U	0	0	0	0	
V	-	-	-	-	
	No	No	No	No	

SPP Report: Southwest Power Pool, Inc., Docket No. AD10-02-15, Filed June 30, 2015, "Informational Filing of 2015 Simultaneous Import Limit Study for SPP Region"  
 See, also, Cedar Bluff Wind, LLC, Docket No. ER15-2676-000, Market-based rate application, Accepted by Letter Order Dated November 13, 2015.

FERC rendition of the electronically filed tariff records in Docket No. ER16-01440-000

Filing Data:

CID: C005221

Filing Title: Roswell Solar, LLC's Application for Market-based Rates

Company Filing Identifier: 789

Type of Filing Code: 390

Associated Filing Identifier:

Tariff Title: Market-Based Rate Tariff

Tariff ID: 205

Payment Confirmation:

Suspension Motion: N

Tariff Record Data:

Record Content Description, Tariff Record Title, Record Version Number, Option Code:

Market-based Rate Tariff, Original Volume No. 1, 0.0.0, A

Record Narrative Name:

Tariff Record ID: 2235

Tariff Record Collation Value: 1073741824 Tariff Record Parent Identifier: 0

Proposed Date: 2016-06-15

Priority Order: 500

Record Change Type: NEW

Record Content Type: 1

Associated Filing Identifier:

## **Roswell Solar, LLC**

1. Availability. Roswell Solar, LLC (“Seller”) makes available under this Tariff, Volume No. 1 (the “Tariff”):
  - a) Electric energy and capacity available under this Rate Schedule to any purchaser for resale.
  - b) 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 the 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;
  - c) New York: Seller offers regulation and frequency response service, and operating reserve service (which includes 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. (“NYISO”);
  - d) 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 reserve service) to purchasers within the markets administered by the ISO New England, Inc. (“ISO-NE”);
  - e) 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;

- f) Midcontinent ISO: 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. (“Midcontinent ISO”) and to others that are self-supplying ancillary services to Midcontinent ISO; and
  - g) 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.
  - h) 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.
2. Applicability. This Tariff is applicable to the following sales by Seller, to the extent such sales are subject to the jurisdiction of the Commission and not made pursuant to another tariff or rate schedule on file with the Commission: (a) all wholesale sales of electric energy and capacity; and (b) all sales into the ancillary service markets described in Section 1 above.
  3. Rates. All sales made under this Tariff shall be made at the rates established between the purchaser and Seller.
  4. Duration. This Tariff shall continue in effect until terminated or changed and such termination or change becomes effective in accordance with any applicable regulatory requirements.

5. Modifications. Seller may unilaterally apply, under Federal Power Act Section 205 and the regulations promulgated thereunder, to the Commission or other regulatory agency having jurisdiction for a modification of this Tariff.
6. Other Terms and Conditions. All other terms and conditions shall be established by agreement between the purchaser and Seller.
7. Compliance with Commission Regulations. Seller shall comply with the provisions of 18 C.F.R. 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 C.F.R. 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.
8. Limitations and Exemptions Regarding Market-Based Rate Authority.

Seller has authorization for the following waivers:

- Waiver of requirements of Parts 41, 101, and 141, except Sections 141.14 and 141.15;
- Waiver of the reporting requirements of Subparts B and C of Part 35, except Sections 35.12(a), 35.13(b), 35.15, and 35.16; and
- Blanket authorization under Part 34 of all future issuances of securities and assumption of liability.

Notwithstanding the Applicability under Section 2 above, with regard to non-affiliated persons or entities, Seller shall not make wholesale sales of energy or capacity to, or purchases of energy or capacity from, peninsular Florida without first receiving advance approval by the Federal Energy Regulatory Commission pursuant to a separate filing under Section 205 of the Federal Power Act. *See Roswell Solar, LLC*, Docket No. ER16-\_\_\_\_-000.

9. Seller Category: Seller is a Category 2 seller in the SPP Region, and is a Category 1 seller in the Northeast, Southeast, Northwest, Southwest, and Central Regions, as defined in 18 CFR 35.36(a).
10. Effective Date. This Tariff shall become effective on the date specified by the Commission.



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	Location		In-Service Date	Capacity Rating: Nameplate (MW)	Capacity Rating: Used in Filing (MW)	Capacity Rating: Methodology Used in Filing (EIA, (A)Alternative)	End Note Number (Enter text in End Note Tab)
							Geographic Region						
Pheasant Run Wind, LLC	ER13-2441	Pheasant Run	Pheasant Run Wind, LLC	Pheasant Run Wind, LLC	N/A	MISO	Central		11/05/2013	74.8	75	N	
Tuscola Wind II, LLC	ER13-2458	Tuscola II	Tuscola Wind II, LLC	Tuscola Wind II, LLC	N/A	MISO	Central		11/10/2013	100.3	100.3	N	
Tuscola Bay Wind, LLC	ER12-1660	Tuscola Bay	Tuscola Bay Wind, LLC	Tuscola Bay Wind, LLC	N/A	MISO	Central		11/23/2012	120	120	N	1
White Oak Energy, LLC	ER10-2078	White Oak Energy	White Oak Energy, LLC	White Oak Energy, LLC	6/10/2011	MISO	Central		11/1/2010	150	150	N	
Ashtabula Wind III, LLC	ER11-26	Ashtabula Wind III	Ashtabula Wind III, LLC	Ashtabula Wind III, LLC	N/A	MISO	Central		12/1/2010	62.4	62.4	N	
Baldwin Wind, LLC	ER10-2551	Baldwin Wind	Baldwin Wind, LLC	Baldwin Wind, LLC	N/A	WAUE	Central		10/15/2010	102.4	102.4	N	
Day County Wind, LLC	ER10-825	Day County Wind	Day County Wind, LLC	Day County Wind, LLC	N/A	WAUE	Central		4/7/2010	99	99	N	
Garden Wind, LLC	ER10-296	Garden Wind	Garden Wind, LLC	Garden Wind, LLC	N/A	MISO	Central		12/20/2009	150	150	N	
Crystal Lake Wind III, LLC	ER10-297	Crystal Lake III	Crystal Lake III, LLC	Crystal Lake III, LLC	N/A	MISO	Central		12/20/2009	66	66	N	
Butler Ridge Wind Energy Center, LLC	ER10-2	Butler Ridge	Butler Ridge Wind Energy Center, LLC	Butler Ridge Wind Energy Center, LLC	N/A	MISO	Central		12/5/2009	54	54	N	
Wessington Wind Energy Center, LLC	ER10-3	Wessington	Wessington Wind Energy Center, LLC	Wessington Wind Energy Center, LLC	N/A	WAUE	Central		12/5/2009	51	51	N	
Wilton Wind II, LLC	ER09-1760	Wilton Wind II	Wilton Wind II, LLC	Wilton Wind II, LLC	N/A	WAUE	Central		10/1/2009	49.5	49.5	N	
Ashtabula Wind II, LLC	ER09-1656	Ashtabula Wind II	Ashtabula Wind II, LLC	Ashtabula Wind II, LLC	N/A	MISO	Central		9/1/2009	120	120	N	
Crystal Lake Wind, LLC	ER08-1293	Crystal Lake I	Crystal Lake Wind, LLC	Crystal Lake Wind, LLC	N/A	Alliant (MISO)	Central		11/1/2008	150	150	N	
Crystal Lake Wind II, LLC	ER08-1294	Crystal Lake II	Crystal Lake Wind II, LLC	Crystal Lake Wind II, LLC	N/A	Alliant (MISO)	Central		12/1/2008	200	200	N	
Ashtabula Wind I, LLC	ER08-1297	Ashtabula Wind I	Ashtabula Wind I, LLC	Ashtabula Wind I, LLC	N/A	Alliant (MISO)	Central		11/1/2008	50	50	N	
Story Wind, LLC	ER08-1300	Story County	Story Wind, LLC	Story Wind, LLC	N/A	Alliant (MISO)	Central		11/1/2008	150	150	N	
Langdon Wind, LLC	ER08-250	Langdon	Langdon Wind, LLC	Langdon Wind, LLC	N/A	OTP (MISO)	Central		11/1/2007	159	159	N	
FPL Energy Oliver Wind I, LLC	ER09-138	Oliver County I	FPL Energy Oliver Wind I, LLC	FPL Energy Oliver Wind I, LLC	N/A	MP (MISO)	Central		11/1/2008	50.6	50.6	N	
FPL Energy Oliver Wind II, LLC	ER08-197	Oliver County II	FPL Energy Oliver Wind II, LLC	FPL Energy Oliver Wind II, LLC	N/A	MP (MISO)	Central		11/1/2007	48	48	N	
FPL Energy South Dakota Wind, LLC	ER03-1103	South Dakota Wind	FPL Energy South Dakota Wind, LLC	FPL Energy South Dakota Wind, LLC	N/A	WAUE	Central		10/1/2003	40.5	41	N	
Hawkeye Power Partners, LLC	ER98-2076	Cerro Gordo Wind Project	Hawkeye Power Partners, LLC	Hawkeye Power Partners, LLC	N/A	ALTW (MISO)	Central		6/1/1999	40.5	42	N	
FPL Energy Hancock County Wind, LLC	ER03-34	Hancock County (Iowa)	FPL Energy Hancock County Wind, LLC	FPL Energy Hancock County Wind, LLC	N/A	ALTW (MISO)	Central		12/1/2002	97.6	98	N	
Lake Benton Power Partners II, LLC	ER98-4222	Lake Benton II	Lake Benton Power Partners II, LLC	Lake Benton Power Partners II, LLC	6/1/2000	NSP (MISO)	Central		6/1/1999	102.75	103.5	N	
FPL Energy North Dakota Wind, LLC	ER03-1104	North Dakota	FPL Energy North Dakota Wind, LLC	FPL Energy North Dakota Wind, LLC	N/A	WAUE	Central		10/1/2003	40.5	41	N	
NextEra Energy Duane Arnold, LLC 1/1/a FPL Energy Duane Arnold, LLC	ER09-989 (former docket no. ER05-1281)	Duane Arnold	NextEra Energy Duane Arnold, LLC	NextEra Energy Duane Arnold, LLC	2006	ALTW (MISO)	Central		2/1/1975	615	601.4 summer/ 622.1 winter	S	2
FPL Energy Burleigh County Wind, LLC	ER06-9	Wilton Wind	FPL Energy Burleigh County Wind, LLC	FPL Energy Burleigh County Wind, LLC	N/A	WAUE	Central		1/1/2006	49.5	50	N	
FPL Energy Mower County, LLC	ER06-1261	Mower County	FPL Energy Mower County, LLC	FPL Energy Mower County, LLC	N/A	ALTW (MISO)	Central		12/1/2006	98.9	99	N	
NextEra Energy Point Beach, LLC 1/a FPL Energy Point Beach, LLC	ER09-989 (former docket no. ER07-904)	Point Beach	NextEra Energy Point Beach, LLC	NextEra Energy Point Beach, LLC	9/28/2007	WEP (MISO)	Central		1/1/1970	1,189.80	1,197 summer/ 1,217 winter	S	3
FPL Energy North Dakota Wind II, LLC	ER03-1105	North Dakota II	FPL Energy North Dakota Wind II, LLC	FPL Energy North Dakota Wind II, LLC	N/A	OTP (MISO)	Central		10/1/2003	21	21	N	
Oscoea Windpower, LLC	ER07-174	Oscoea (Iowa)	Oscoea Windpower, LLC	Oscoea Windpower, LLC	N/A	MISO	Central		8/1/2007	100	100	N	
Windpower Partners 1993, LLC	OF-94-82	Windpower Pirs '93 (Buffalo Ridge)	Windpower Partners 1993, LLC	Windpower Partners 1993, LLC	12/1/2003	NSP (MISO)	Central		5/1/1994	25.92	22	N	
Live Oak Solar, LLC	ER16-1354	Live Oak Solar	Live Oak Solar, LLC	Live Oak Solar, LLC	N/A	SOCO	Southeast		9/1/2016	76.5	76.5	N	
White Oak Solar, LLC	ER16-1293	White Oak Solar	White Oak Solar, LLC	White Oak Solar, LLC	N/A	SOCO	Southeast		5/29/2016	101.3	101.3	N	
White Pine Solar, LLC	ER16-1271	White Pine Solar	White Pine Solar, LLC	White Pine Solar, LLC	N/A	SOCO	Southeast		5/24/2016	250 summer/ 250 winter	250 summer/ 250 winter	S	
Florida Power & Light Company	ER15-2485	Cedar Bay	CBAS Power Holdings, LLC	Florida Power & Light Company	9/18/2015	FPL	Southeast		1/1/1990			S	
Florida Power & Light Company	ER03-1292	Riviera Beach	Florida Power & Light Company	Florida Power & Light Company	N/A	FPL	Southeast		4/1/2014	1,250	1,212 summer/ 1,344 winter	S	
Florida Power & Light Company	ER03-1292	Lauderdale	Florida Power & Light Company	Florida Power & Light Company	N/A	FPL	Southeast		8/1/1970	840	1,724 summer/ 1,930 winter	S	
Florida Power & Light Company	ER03-1292	Fort Myers	Florida Power & Light Company	Florida Power & Light Company	N/A	FPL	Southeast		5/1/1974	1,432	2,395 summer/ 2,580 winter	S	
Florida Power & Light Company	ER03-1292	St Lucie 1 & 2	Florida Power & Light Company	Florida Power & Light Company	N/A	FPL	Southeast		5/1/1976	981	1,968 summer/ 2,013 winter	S	
Florida Power & Light Company	ER03-1292	Cape Canaveral	Florida Power & Light Company	Florida Power & Light Company	N/A	FPL	Southeast		4/24/2013	853	1,210 summer/ 2,013 winter	S	
Florida Power & Light Company	ER03-1292	Sanford	Florida Power & Light Company	Florida Power & Light Company	N/A	FPL	Southeast		6/1/2002	1,210	1,912 summer/ 2,077 winter	S	
Florida Power & Light Company	ER03-1292	St Johns River Power Park	Florida Power & Light Company	Florida Power & Light Company	N/A	FPL	Southeast		3/1/1987	1,980	1,252 summer/ 1,276 winter	S	5
Florida Power & Light Company	ER03-1292	Scherer 4	Florida Power & Light Company	Florida Power & Light Company	N/A	SOCO	Southeast		7/1/1989	254	858 summer/ 859 winter	S	6
Florida Power & Light Company	ER97-3359	West County Energy Center Unit 1, 2, and 3	Florida Power & Light Company	Florida Power & Light Company	N/A	FPL	Southeast		8/27/2009, 11/3/2009, 5/23/2011	643	3,669 summer/ 4,019 winter	S	
Florida Power & Light Company	ER97-3359	Space Coast Solar Energy Center	Florida Power & Light Company	Florida Power & Light Company	N/A	FPL	Southeast		4/16/2010	3,657	10	N	
Florida Power & Light Company	ER97-3359	DeSoto Next Generation Solar Energy Center	Florida Power & Light Company	Florida Power & Light Company	N/A	FPL	Southeast		10/21/2009	10	25	N	
Florida Power & Light Company	ER97-3359	Manatee	Florida Power & Light Company	Florida Power & Light Company	N/A	FPL	Southeast		10/1/1976	25	2,735 summer/ 2,831 winter	S	
Florida Power & Light Company	ER97-3359	Marlin	Florida Power & Light Company	Florida Power & Light Company	N/A	FPL	Southeast		12/1/1980	2,729	3,695 summer/ 3,840 winter	S	
Florida Power & Light Company	ER97-3359	Turkey Point	Florida Power & Light Company	Florida Power & Light Company	N/A	FPL	Southeast		1/1/1967	3,731	3,148 summer/ 3,228 winter	S	
Blue Summit Wind, LLC	N/A	Blue Summit	Blue Summit Wind, LLC	Blue Summit Wind, LLC	N/A	ERCOT	N/A		N/A	3,176	135.4	N	
FPLE Forney, LLC	N/A	Forney	FPLE Forney, LLC	FPLE Forney, LLC	N/A	ERCOT	NA		6/1/2003	1,796	1,002.0 summer/ 1,098 winter	S	
Lamar Power Partners, LLC	N/A	Lamar Power Partners	Lamar Power Partners, LLC	Lamar Power Partners, LLC	N/A	ERCOT	NA		7/1/2000, 12/01/2000	1,002	1,796.0 summer/ 1,879.9 winter	S	
FPL Energy Callahan Wind, LLC	N/A	Callahan Divide	FPL Energy Callahan Wind, LLC	FPL Energy Callahan Wind, LLC	N/A	ERCOT	NA		2/1/2005	114	114	N	
Capricorn Ridge Wind, LLC	N/A	Capricorn Ridge	Capricorn Ridge Wind, LLC	Capricorn Ridge Wind, LLC	N/A	ERCOT	NA		11/1/2007	364	364	N	
Capricorn Ridge Wind II, LLC	N/A	Capricorn Ridge II	Capricorn Ridge Wind II, LLC	Capricorn Ridge Wind II, LLC	N/A	ERCOT	NA		5/1/2008	298.5	299	N	

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						Market / Balancing Authority Area	Geographic Region	In-Service Date				
Indian Mesa Wind Farm, LLC	N/A	Indian Mesa	Indian Mesa Wind Farm, LLC	Indian Mesa Wind Farm, LLC	6/1/2002	ERCOT	NA	1/1/2001	82.5	82.5	N	
FPL Energy Upton Wind, LLC	N/A	King Mountain	FPL Energy Upton Wind, LLC	FPL Energy Upton Wind, LLC	N/A	ERCOT	NA	12/1/2001	278.2	278	N	
West Texas Wind Energy Partners, LLC	N/A	Southwest Mesa	West Texas Wind Energy Partners, LLC	West Texas Wind Energy Partners, LLC	N/A	ERCOT	NA	7/1/1999	77.3	75	N	
Wolf Ridge Wind, LLC	N/A	Wolf Ridge Wind, LLC	Wolf Ridge Wind, LLC	Wolf Ridge Wind, LLC	N/A	ERCOT	NA	5/1/2008	112.5	113	N	
FPL Energy Pecos Wind I - II, LLC	N/A	Woodward Mountain (Pecos Wind)	FPL Energy Pecos Wind I - II, LLC	FPL Energy Pecos Wind I - II, LLC	N/A	ERCOT	NA	7/1/2001	158.4	160	N	
FPL Energy Horse Hollow Wind, LLC	N/A	Horse Hollow 1-4	FPL Energy Horse Hollow Wind I - IV, LLC	FPL Energy Horse Hollow Wind I - IV, LLC	N/A	ERCOT	NA	09/01/2006	735.5	735.5	N	
Post Wind Farm, LLC	N/A	Red Canyon	Post Wind Farm, LLC	Post Wind Farm, LLC	N/A	ERCOT	NA	4/1/2008	84	84	N	
Green Mountain Storage, LLC	ER15-2601	Green Mountain Storage	Green Mountain Storage, LLC	Green Mountain Storage, LLC	N/A	PJM	Northeast	11/2/2015	10.4	10.4	N	
Meyersdale Storage, LLC	ER15-2602	Meyersdale Storage	Meyersdale Storage, LLC	Meyersdale Storage, LLC	N/A	PJM	Northeast	11/2/2015	18	18	N	
Mantua Creek Solar, LLC	ER14-1630	N/A	N/A	N/A	N/A	PJM	Northeast	N/A	N/A	N/A	N/A	
NEPM II, LLC	ER11-4462	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
NextEra Energy Power Marketing, LLC	ER09-832	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Energy Storage Holdings, LLC	ER13-752	Energy Storage Holdings	Energy Storage Holdings, LLC	Energy Storage Holdings, LLC	N/A	PJM	Northeast	1/1/2013	2	1.8	N	
Paradise Solar Urban Renewal, L.L.C.	N/A	Paradise Solar	Paradise Solar Urban Renewal, L.L.C.	Mantua Creek Solar, LLC	N/A	PJM	Northeast	12/20/2010	5.1	5.1	N	
NextEra Energy Services Massachusetts, LLC (f/k/a Gexa Energy, LLC)	ER10-1951 (former docket no. ER05-714)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
FPL Energy Illinois Wind, LLC	ER10-402	Illinois Wind	FPL Energy Illinois Wind, LLC	FPL Energy Illinois Wind, LLC	N/A	PJM	Northeast	12/20/2009	240	240	N	
FPL Energy Cape, LLC	ER00-3068	Cape	FPL Energy Cape, LLC	FPL Energy Cape, LLC	1999	ISO-NE	Northeast	8/1/1991	305	277.6 summer/ 336.5 winter	S	7
FPL Energy Wyman, LLC	ER98-3566	Wyman	FPL Energy Wyman, LLC	FPL Energy Wyman, LLC	1999	ISO-NE	Northeast	1/1/1978	632	617.3 summer/ 84.7 winter	S	8
FPL Energy Wyman IV, LLC	ER98-3564	Wyman 4	FPL Energy Wyman IV, LLC	FPL Energy Wyman IV, LLC	1999	ISO-NE	Northeast	1/1/1978	632	617.3 summer/ 84.7 winter	S	8
NextEra Energy Seabrook, LLC (f/k/a FPL Energy Seabrook, LLC)	ER09-990 (former docket no. ER02-1838)	Seabrook	NextEra Energy Seabrook, LLC	NextEra Energy Seabrook, LLC	11/1/2002	ISO-NE	Northeast	8/1/1990	1,246.70	1,246.2 summer/ 1,246.7 winter	S	9
Baywater Peaking Facility, LLC	ER02-669	Baywater	Baywater Peaking Facility, LLC	Baywater Peaking Facility, LLC	N/A	NYSO	Northeast	6/1/2002	55	53.7 summer/ 54.2 winter	S	
Jamaica Bay Peaking Facility, LLC	ER03-623	Jamaica Bay	Jamaica Bay Peaking Facility, LLC	Jamaica Bay Peaking Facility, LLC	N/A	NYSO	Northeast	7/1/2003	55	54.3 summer/ 55.4 winter	S	
North Jersey Energy Associates	ER04-187	Sayreville	North Jersey Energy Associates	North Jersey Energy Associates	1998	PJM	Northeast	8/1/1991	315	271 summer/ 315 winter	S	10
Pennsylvania Windfarms, LLC	ER02-2166	Green Mountain	Pennsylvania Windfarms, LLC	Pennsylvania Windfarms, LLC	8/1/2002	PJM	Northeast	5/1/2003	0	10.4	N	
Backbone Mountain Windpower LLC	ER02-2559	Mountains Wind	Backbone Mountain Windpower LLC	Backbone Mountain Windpower LLC	6/1/2002	PJM	Northeast	12/1/2002	66	66	N	
Meyersdale Windpower LLC	ER04-290	Meyersdale Wind	Meyersdale Windpower LLC	Meyersdale Windpower LLC	N/A	PJM	Northeast	12/1/2003	30	30	N	
Mill Run Windpower LLC	ER01-1710	Mill Run Wind	Mill Run Windpower LLC	Mill Run Windpower LLC	4/1/2003	PJM	Northeast	12/1/2001	15	15	N	
Somerset Windpower LLC	ER01-2139	Somerset Wind	Somerset Windpower LLC	Somerset Windpower LLC	4/1/2003	PJM	Northeast	12/1/2001	9	9	N	
Waymart Wind Farm L.P.	ER03-1375	Waymart Wind	Waymart Wind Farm L.P.	Waymart Wind Farm L.P.	3/1/2003	PJM	Northeast	10/1/2003	64.5	65	N	

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							Geographic Region	In-Service Date	Capacity Rating: Nameplate (MW)				
FPL Energy MH50, L.P.	ER99-2917	Marcus Hook 50	FPL Energy MH50, L.P.	FPL Energy MH50, L.P.	1999	PJM	Northeast		1/1/1987	50	50 summer/ 50 winter	S	
FPL Energy Marcus Hook, L.P.	ER02-1903	Marcus Hook 750	FPL Energy Marcus Hook, L.P.	FPL Energy Marcus Hook, L.P.	N/A	PJM	Northeast		12/1/2004	790	726.5 summer/ 808.4 winter	S	
Blythe Solar II, LLC	ER16-632	Blythe Solar II	Blythe Solar II, LLC	Blythe Solar II, LLC	N/A	CAISO	Southwest		4/1/2014	131.2	131.2	N	
Blythe Solar T10, LLC	ER16-91	Blythe Solar T10	Blythe Solar T10, LLC	Blythe Solar T10, LLC	N/A	CAISO	Southwest		12/1/2015	116.5	116.5	N	
Golden Hills Interconnection, LLC	ER16-90	Golden Hills Interconnection	Golden Hills Interconnection, LLC	Golden Hills Interconnection, LLC	N/A	CAISO	Southwest		11/18/2015	0	0	N/A	
Golden Hills Wind, LLC	ER15-2477	Golden Hills Wind	Golden Hills Wind, LLC	Golden Hills Wind, LLC	N/A	CAISO	Southwest		10/1/2015	85.92	85.9	N	
Silver State Solar Power South, LLC	ER15-2243	Silver State Solar Power South	Silver State Solar Power South, LLC	Silver State Solar Power South, LLC	N/A	NV Energy	Southwest		9/15/2015	250	250	N	
Adelanto Solar, LLC	ER15-1883	Adelanto Solar	Adelanto Solar, LLC	Adelanto Solar, LLC	N/A	CAISO	Southwest		8/5/2015	20	20	N	11
Adelanto Solar II, LLC	ER15-1418	Adelanto Solar II	Adelanto Solar II, LLC	Adelanto Solar II, LLC	N/A	CAISO	Southwest		6/1/2015	7	7	N	12
McCoy Solar, LLC	ER15-1375	McCoy Solar	McCoy Solar, LLC	McCoy Solar, LLC	N/A	CAISO	Southwest		6/1/2015	250	250	N	13
Shafter Solar, LLC	ER15-1076	Shafter Solar	Shafter Solar, LLC	Shafter Solar, LLC	N/A	CAISO	Southwest		3/15/2015	20	20	N	14
Mountain View Solar, LLC	ER14-21	Mountain View	Mountain View Solar, LLC	Mountain View Solar, LLC	N/A	NV Energy	Southwest		11/1/2013	20	20	N	
Genesis Solar, LLC	ER13-2112	Genesis Solar	Genesis Solar, LLC	Genesis Solar, LLC	N/A	CAISO	Southwest		10/3/2013	250	250	N	15
Desert Sunlight 250, LLC	ER13-1991	Desert Sunlight 250	Desert Sunlight 250, LLC	Desert Sunlight 250, LLC	N/A	CAISO	Southwest		8/2/2013	250	125	N	33
Desert Sunlight 300, LLC	ER13-1992	Desert Sunlight 300	Desert Sunlight 300, LLC	Desert Sunlight 300, LLC	N/A	CAISO	Southwest		7/22/2013	300	150	N	34
Perrin Ranch Wind, LLC	ER12-674	Perrin Ranch	Perrin Ranch Wind, LLC	Perrin Ranch Wind, LLC	N/A	ADPS	Southwest		1/1/2012	99.2	99.2	N	16
North Sky River Energy, LLC	ER12-2444	North Sky River	North Sky River Energy, LLC	North Sky River Energy, LLC	N/A	CAISO	Southwest		11/1/2012	162	162	N	
Windpower Partners 1993, LLC	ER12-631	San Geronimo Wind	Windpower Partners 1993, LLC	Windpower Partners 1993, LLC	N/A	CAISO	Southwest		11/1/2011	49.5	49.5	N	
NextEra Energy Montezuma II Wind, LLC	ER11-4677	Montezuma II Wind	NextEra Energy Montezuma II Wind, LLC	NextEra Energy Montezuma II Wind, LLC	N/A	CAISO	Southwest		11/15/2011	78.2	78.2	N	
Vasco Winds, LLC	ER11-4678	Vasco Winds	Vasco Winds, LLC	Vasco Winds, LLC	N/A	CAISO	Southwest		11/1/2011	78.2	78.2	N	
Red Mesa Wind, LLC	ER11-2192	Red Mesa Wind	Red Mesa Wind, LLC	Red Mesa Wind, LLC	N/A	EPE	Southwest		N/A	5	5	N	
FPL Energy Montezuma Wind, LLC	ER11-2160	Montezuma Wind	FPL Energy Montezuma Wind, LLC	FPL Energy Montezuma Wind, LLC	N/A	PNM	Southwest		11/25/2010	102.4	102.4	N	
Sky River LLC	ER09-801	Sky River	Sky River LLC	Sky River LLC	1991-2002	CAISO	Southwest		2/1/1991	32.5	32.5	N	31
FPL Energy Cabazon Wind, LLC	ER09-902	Cabazon Wind	FPL Energy Cabazon Wind, LLC	FPL Energy Cabazon Wind, LLC	12/1/2003	CAISO	Southwest		N/A	39	39	N	32
Diablo Winds, LLC	ER05-222	Diablo Wind	Diablo Winds, LLC	Diablo Winds, LLC	N/A	CAISO	Southwest		12/1/2004	20.64	21	N	
FPL Energy Green Power Wind, LLC	ER04-127	Green Power	FPL Energy Green Power Wind, LLC	FPL Energy Green Power Wind, LLC	12/1/2003	CAISO	Southwest		N/A	16.2	16.5	N	
High Winds, LLC	ER03-155	High Winds	High Winds, LLC	High Winds, LLC	N/A	CAISO	Southwest		8/1/2003	162	162	N	
FPL Energy New Mexico Wind, LLC	ER03-179	New Mexico Wind	FPL Energy New Mexico Wind, LLC	FPL Energy New Mexico Wind, LLC	N/A	PNM	Southwest		8/1/2003	204	204	N	
Windpower Partners 1990, L.P.	QF91-42	WindPower Pirs '90	Windpower Partners 1990, L.P.	Windpower Partners 1990, L.P.	1990-2006	CAISO	Southwest		12/1/1990	15	15	N	17
Windpower Partners 1991, L.P.	QF91-119	WindPower Pirs '91	Windpower Partners 1991, L.P.	Windpower Partners 1991, L.P.	1990-2006	CAISO	Southwest		12/1/1988	24	24	N	18
Windpower Partners 1991-2, L.P.	QF91-151	WindPower Pirs '91-2	Windpower Partners 1991-2, L.P.	Windpower Partners 1991-2, L.P.	1990-2006	CAISO	Southwest		2/1/1991	28	28	N	19
Windpower Partners 1992, L.P.	QF89-104	WindPower Pirs '92	Windpower Partners 1992, L.P.	Windpower Partners 1992, L.P.	1990-2006	CAISO	Southwest		12/1/1988	30	30	N	20
Luz Solar Partners LTD III	QF86-734	SEGS III	Luz Solar Partners LTD III	Luz Solar Partners LTD III	2005	CAISO	Southwest		12/1/1986	30	15	N	21
Luz Solar Partners LTD IV	QF86-736	SEGS IV	Luz Solar Partners LTD IV	Luz Solar Partners LTD IV	2005	CAISO	Southwest		12/1/1986	30	11.4	N	22
Luz Solar Partners LTD V	QF87-402	SEGS V	Luz Solar Partners LTD V	Luz Solar Partners LTD V	2005	CAISO	Southwest		9/7/1986	30	13.8	N	23
Luz Solar Partners LTD VI	QF88-33	SEGS VI	Luz Solar Partners LTD VI	Luz Solar Partners LTD VI	2005	CAISO	Southwest		12/1/1988	30	12.3	N	24
Luz Solar Partners LTD VII	QF88-34	SEGS VII	Luz Solar Partners LTD VII	Luz Solar Partners LTD VII	2005	CAISO	Southwest		12/1/1988	30	15	N	25
Luz Solar Partners LTD VIII	QF88-470	SEGS VIII	Luz Solar Partners LTD VIII	Luz Solar Partners LTD VIII	1989	CAISO	Southwest		12/1/1989	80	40	N	26
Luz Solar Partners LTD IX	ER03-472	SEGS IX	Luz Solar Partners LTD IX	Luz Solar Partners LTD IX	1990	CAISO	Southwest		9/1/2001	190.5	200	N	27
Carousal Wind Farm, LLC	ER15-2582	Carousal Wind	Carousal Wind Farm, LLC	Carousal Wind Farm, LLC	N/A	WACM	Northwest		10/30/2015	149.7	150	N	
Golden West Power Partners, LLC	ER15-2101	Golden West	Golden West Power Partners, LLC	Golden West Power Partners, LLC	N/A	WACM	Northwest		9/1/2015	249.4	250	N	
Limon Wind III, LLC	ER14-2138	Limon III	Limon Wind III, LLC	Limon Wind III, LLC	N/A	PSCO	Northwest		7/15/2014	200.6	200.6	N	
Limon Wind II, LLC	ER12-2226	Limon Wind II	Limon Wind II, LLC	Limon Wind II, LLC	N/A	PSCO	Northwest		9/1/2012	200	200	N	
Limon Wind, LLC	ER12-2226	Limon Wind	Limon Wind, LLC	Limon Wind, LLC	N/A	PSCO	Northwest		9/1/2012	200	200	N	
FPL Energy StateLine II, Inc.	ER10-256	StateLine II	FPL Energy StateLine II, Inc.	FPL Energy StateLine II, Inc.	N/A	PACW	Northwest		N/A	96.9	96.9	N	
Northern Colorado Wind Energy, LLC	ER04-297	Northern Colorado Wind	Northern Colorado Wind Energy, LLC	Northern Colorado Wind Energy, LLC	N/A	PSCO	Northwest		6/1/2009	174.3	175	N	28
Peebles Table Wind Energy, LLC	ER07-875	Peebles Table	Peebles Table Wind Energy, LLC	Peebles Table Wind Energy, LLC	N/A	PSCO	Northwest		9/1/2007	201	201	N	
Logan Wind Energy, LLC	ER07-1157	Logan Wind	Logan Wind Energy, LLC	Logan Wind Energy, LLC	N/A	PSCO	Northwest		12/1/2001	201	201	N	
FPL Energy Vansycle L.L.C.	ER01-838	StateLine	FPL Energy Vansycle L.L.C.	FPL Energy Vansycle L.L.C.	N/A	PACW	Northwest		12/01/2002	299.64	300	N	35
ESI Vansycle Partners, L.P.	ER98-2494	Vansycle	ESI Vansycle Partners, L.P.	ESI Vansycle Partners, L.P.	N/A	PACW	Northwest		N/A	24.9	25	N	
Roswell Solar, LLC	N/A	Roswell Solar	Roswell Solar, LLC	Roswell Solar, LLC	N/A	SPP	SPP		6/15/2016	70	70	N	
Cedar Bluff Wind, LLC	ER15-2676	Cedar Bluff	Cedar Bluff Wind, LLC	Cedar Bluff Wind, LLC	N/A	SPP	SPP		11/1/2015	198.7	200	N	
Breckinridge Wind Project, LLC	ER15-1925	Breckinridge Wind	Breckinridge Wind Project, LLC	Breckinridge Wind Project, LLC	N/A	SPP	SPP		8/1/2015	98.1	98.1	N	
Palo Duro Wind Interconnection Services, LLC	ER15-58	Palo Duro Wind Interconnection	Palo Duro Wind Interconnection Services, LLC	Palo Duro Wind Interconnection Services, LLC	N/A	SPP	SPP		12/6/2014	0	0	N/A	
Selling Wind Interconnection Services, LLC	ER15-30	Selling Interconnection	Selling Wind Interconnection Services, LLC	Selling Wind Interconnection Services, LLC	N/A	SPP	SPP		12/2/2014	0	0	N/A	
Selling Wind, LLC	ER14-2708	Selling Wind	Selling Wind, LLC	Selling Wind, LLC	N/A	SPP	SPP		10/1/2014	198.9	200	N	36
Selling Wind II, LLC	ER14-2709	Selling Wind II	Selling Wind II, LLC	Selling Wind II, LLC	N/A	SPP	SPP		10/1/2014	100.3	100	N	37
Palo Duro Wind Energy, LLC	ER14-2710	Palo Duro	Palo Duro Wind Energy, LLC	Palo Duro Wind Energy, LLC	N/A	SPP	SPP		10/1/2014	249.9	263	N	39
Mammoth Plains Wind Project, LLC	ER14-2707	Mammoth Plains	Mammoth Plains Wind Project, LLC	Mammoth Plains Wind Project, LLC	N/A	SPP	SPP		9/19/2014	198.9	200	N	
Steele Flats Wind Project, LLC	ER13-2474	Steele Flats	Steele Flats Wind Project, LLC	Steele Flats Wind Project, LLC	N/A	SPP	SPP		10/1/2013	74.8	75	N	38
Cameron Wind Energy, LLC	ER13-712	Cameron Wind	Cameron Wind, LLC	Cameron Wind, LLC	12/2/2012	SPP	SPP		10/1/2012	165.6	165.6	N	
Ensign Wind, LLC	ER12-2227	Ensign Wind	Ensign Wind, LLC	Ensign Wind, LLC	N/A	MKEC/SPP	SPP		9/21/2012	98.9	98.9	N	
Minco Wind III, LLC	ER12-1880	Minco Wind III	Minco Wind III, LLC	Minco Wind III, LLC	N/A	SPP	SPP		9/1/2012	100.8	100.8	N	
High Majestic Wind II, LLC	ER12-2228	High Majestic II	High Majestic Wind II, LLC	High Majestic Wind II, LLC	N/A	SPP	SPP		7/1/2012	79.6	79.6	N	
Minco Wind Interconnection Services, LLC	ER12-985	Minco Interconnection	Minco Interconnection	Minco Interconnection	N/A	SPP	SPP		3/15/2012	0	0	N/A	
Blackwell Wind, LLC	ER12-569	Blackwell Wind	Blackwell Wind, LLC	Blackwell Wind, LLC	N/A	SPP	SPP		10/1/2012	59.8	59.8	N	
Minco Wind II, LLC	ER11-4428	Minco Wind II	Minco Wind II, LLC	Minco Wind II, LLC	N/A	SPP	SPP		11/8/2011	100.8	100.8	N	
Minco Wind, LLC	ER10-2720	Minco Wind	Minco Wind, LLC	Minco Wind, LLC	N/A	SPP	SPP		11/1/2010	99.2	99.2	N	
Ek City II Wind, LLC	ER11-3037	Ek City II	Ek City II Wind, LLC	Ek City II Wind, LLC	N/A	SPP	SPP		12/1/2010	100.8	100.8	N	
Ek City Wind, LLC	ER10-149	Ek City	Ek City Wind, LLC	Ek City Wind, LLC	N/A	SPP	SPP		11/1/2009	98.9	98.9	N	30
High Majestic Wind Energy Center, LLC	ER10-1	Majestic	High Majestic Wind Energy Center, LLC	High Majestic Wind Energy Center, LLC	N/A	SPP	SPP		12/5/2009	79.5	79.5	N	
Gray County Wind Energy, LLC	ER01-1972	Gray County	Gray County Wind Energy, LLC	Gray County Wind Energy, LLC	N/A	SPP	SPP		11/1/2001	112.2	112	N	
FPL Energy Sooner Wind, LLC	ER03-1333	Sooner Wind	FPL Energy Sooner Wind, LLC	FPL Energy Sooner Wind, LLC	N/A	SPP	SPP		9/1/2003	51	51	N	
FPL Energy Oklahoma Wind, LLC	ER03-1332	Oklahoma Wind	FPL Energy Oklahoma Wind, LLC	FPL Energy Oklahoma Wind, LLC	N/A	SPP	SPP		10/01/2003	51	51	N	
FPL Energy Cowboy Wind, LLC	ER05-487	Cowboy Wind (Weatherford)	FPL Energy Cowboy Wind, LLC	FPL Energy Cowboy Wind, LLC	N/A	SPP	SPP		4/1/2005	147	147	N	
Gosben Wind, LP	FC15-5	Gosben Wind	Gosben Wind, LP	Gosben Wind, LP	N/A	IESO	Canada		1/31/2015	29	N/A	N	
Kerwood Wind, LP	FC14-17	Kerwood Wind	Kerwood Wind, LP	Kerwood Wind, LP	N/A	IESO	Canada		8/19/2014	59.9	N/A	N	
Bornish Wind, LP	FC14-16	Bornish Wind	Bornish Wind, LP	Bornish Wind, LP	N/A	IESO	Canada		8/14/2014	72.9	N/A	N	
East Durham Wind LP	FC14-15	East Durham	East Durham Wind LP	East Durham Wind LP	N/A	IESO	Canada		1/7/2015	22.2	N/A	N	
Varna Wind, Inc.	FC14-13	Varna Wind	Varna Wind, Inc.	Varna Wind, Inc.	N/A	IESO	Canada		7/1/2014	60	N/A	N	
Summerhaven Wind, LP	FC13-13	Summerhaven	Summerhaven Wind, LP	Summerhaven Wind, LP	N/A	IESO	Canada		8/1/2013	124.4	N/A	N	
Conestogo Wind, LP	FC13-7	Conestogo Wind	Conestogo Wind, LP	Conestogo Wind, LP	N/A	IESO	Canada		12/1/2012	22.9	N/A	N	
Moore Solar, Inc.	FC12-4	Moore Solar	Moore Solar, Inc.	Moore Solar, Inc.	2/27/2012	IESO	Canada		2/1/2011	20	N/A	N	
Sombra Solar, Inc.	FC11-7	Sombra Solar	Sombra Solar, Inc.	Sombra Solar, Inc.	2/27/2012	IESO	Canada		2/1/2011	20	N/A	N	
Ghost Pine Windfarm, LP	FC11-5	Ghost Pine	Ghost Pine Windfarm, LP	Ghost Pine Windfarm, LP	N/A	AESO	Canada		12/31/2010	81.6	N/A	N	
Mount Miller Wind Energy Limited Partnership	FC11-3	Mount Miller	Mount Miller Wind Energy Limited Partnership	Mount Miller Wind Energy Limited Partnership	Dec-10	NPCC	Canada		6/1/2005	52.2	N/A	N	



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Florida Power & Light Company	ER15-2485	Cedar Bay
Florida Power & Light Company	ER03-1292	Riviera Beach
Florida Power & Light Company	ER03-1292	Lauderdale
Florida Power & Light Company	ER03-1292	Fort Myers
Florida Power & Light Company	ER03-1292	St Lucie 1
Florida Power & Light Company	ER03-1292	St Lucie 2
Florida Power & Light Company	ER03-1292	Cape Canaveral
Florida Power & Light Company	ER03-1292	Sanford
Florida Power & Light Company	ER03-1292	St Johns River Power Park
Florida Power & Light Company	ER03-1292	Scherer 4
Florida Power & Light Company	ER97-3359	West County Energy Center Unit 3
Florida Power & Light Company	ER97-3359	Space Coast Solar Energy Center
Florida Power & Light Company	ER97-3359	DeSoto Next Generation Solar Energy Center
Florida Power & Light Company	ER97-3359	West County Energy Center Unit 1
Florida Power & Light Company	ER97-3359	West County Energy Center Unit 2
Florida Power & Light Company	ER97-3359	Manatee
Florida Power & Light Company	ER97-3359	Martin
Florida Power & Light Company	ER97-3359	Turkey Point

Owned By	Controlled By	Date Control Transferred
CBAS Power Holdings, LLC	Florida Power & Light Company	9/18/2015
Florida Power & Light Company	Florida Power & Light Company	N/A
Florida Power & Light Company	Florida Power & Light Company	N/A
Florida Power & Light Company	Florida Power & Light Company	N/A
Florida Power & Light Company	Florida Power & Light Company	N/A
Florida Power & Light Company	Florida Power & Light Company	N/A
Florida Power & Light Company	Florida Power & Light Company	N/A
Florida Power & Light Company	Florida Power & Light Company	N/A
Florida Power & Light Company	Florida Power & Light Company	N/A
Florida Power & Light Company	Florida Power & Light Company	N/A
Florida Power & Light Company	Florida Power & Light Company	N/A
Florida Power & Light Company	Florida Power & Light Company	N/A
Florida Power & Light Company	Florida Power & Light Company	N/A
Florida Power & Light Company	Florida Power & Light Company	N/A
Florida Power & Light Company	Florida Power & Light Company	N/A
Florida Power & Light Company	Florida Power & Light Company	N/A
Florida Power & Light Company	Florida Power & Light Company	N/A
Florida Power & Light Company	Florida Power & Light Company	N/A

Market / Balancing Authority Area	Geographic Region	In-Service Date	Capacity Rating: Nameplate (MW)
FPL	Southeast	1/1/1990	
FPL	Southeast	4/1/2014	
FPL	Southeast	8/1/1970	
FPL	Southeast	5/1/1974	
FPL	Southeast	5/1/1976	
FPL	Southeast	6/1/1983	
FPL	Southeast	4/24/2013	
FPL	Southeast	6/1/2002	
FPL	Southeast	3/1/1987	
SOCO	Southeast	7/1/1989	
FPL	Southeast	5/23/2011	
FPL	Southeast	4/16/2010	
FPL	Southeast	10/27/2009	
FPL	Southeast	8/27/2009	
FPL	Southeast	11/3/2009	
FPL	Southeast	10/1/1976	
FPL	Southeast	12/1/1980	
FPL	Southeast	1/1/1967	



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Filing Entity and its Energy Affiliates	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: (length (miles) and kV)	End Note Number (Enter text in End Note Tab)
						Market / Balancing Authority Area	Geographic Region		
Florida Power & Light Company - Trans.	Florida Power & Light Company, 92 FERC 61,241 (2000)	FPL-Trans	FPL	FPL	N/A	FPL	Southeast	1,106.2 miles and Combined 500 kV Lines	
Florida Power & Light Company - Trans.	Florida Power & Light Company, 92 FERC 61,241 (2000)	FPL-Trans	FPL	FPL	N/A	FPL	Southeast	2,960.0 miles Combined 230 kV Lines	
Florida Power & Light Company - Trans.	Florida Power & Light Company, 92 FERC 61,241 (2000)	FPL-Trans	FPL	FPL	N/A	FPL	Southeast	1,658.0 miles Combined 138 kV Lines	
Florida Power & Light Company - Trans.	Florida Power & Light Company, 92 FERC 61,241 (2000)	FPL-Trans	FPL	FPL	N/A	FPL	Southeast	730.6 miles Combined 115 kV Lines	
Florida Power & Light Company - Trans.	Florida Power & Light Company, 92 FERC 61,241 (2000)	FPL-Trans	FPL	FPL	N/A	FPL	Southeast	178.1 miles Combined 69 kV Lines	
New Hampshire Transmission, LLC - Trans.	New Hampshire Transmission, LLC, Unpublished Letter Order, ER10-1523 (issued Jul. 27, 2010). (Schedule 21 to the ISO-NE Tariff).	Seabrook Substation (interconnects Seabrook and 3 345 kV transmission lines)	NEET	ISO-NE	2004	ISO-NE	Northeast	900 ft. and 3 345 kV Lines	
NextEra Energy Resources, LLC-Trans	Sagebrush, a California partnership, 130 FERC ¶ 61,093, order on reh'g, 132 FERC ¶ 61,234 (2010)	Sagebrush, a California Partnership (gen tie)	Sagebrush Partners	Sagebrush Partners	NA	CAISO	Southwest	46 miles and 220 kV gen tie	1
NextEra Energy Resources, LLC - Trans.	Sky River LLC, 136 FERC ¶ 61,162 (2011)	Sky River LLC (gen tie) (Wilderness Line)	NextEra Energy	NextEra Energy	NA	CAISO	Southwest	9 miles and 230 kV gen tie	
NextEra Energy Resources, LLC - Trans.	Peetz Logan Interconnect, LLC, 136 FERC ¶ 61,075 (2011); 142 FERC ¶ 61,035 (2013)	Peetz Logan Interconnect, LLC (gen tie)	NextEra Energy	NextEra Energy	NA	PSCo	Northwest	78 miles and 230 kV gen tie	
NextEra Energy Resources, LLC - Nat. Gas.	N/A	NextEra Energy Forney Pipeline, L.P. (Hinshaw pipeline serving NextEra Energy Forney)	NextEra Energy	NextEra Energy	NA	ERCOT	ERCOT	1000 ft.	2
NextEra Energy Resources, LLC - Nat. Gas.	N/A	The NET Mexico Pipeline Partners, LLC	NextEra Energy & NextEra Energy Partners	NextEra Energy	NA	ERCOT	ERCOT	120 miles	3
NextEra Energy Resources, LLC - Nat. Gas.	N/A	Eagle Ford Midstream, LP	NextEra Energy & NextEra Energy Partners	NextEra Energy	NA	ERCOT	ERCOT	166 miles	4
NextEra Energy Resources, LLC - Nat. Gas.	N/A	Monument Pipeline, LP	NextEra Energy & NextEra Energy Partners	NextEra Energy	NA	ERCOT	ERCOT	78 miles	5
NextEra Energy Resources, LLC - Nat. Gas.	N/A	LaSalle Pipeline, LP	NextEra Energy & NextEra Energy Partners	NextEra Energy	NA	ERCOT	ERCOT	52 miles	6
NextEra Energy Resources, LLC - Nat. Gas.	N/A	South Shore Pipeline, LP	NextEra Energy & NextEra Energy Partners	NextEra Energy	NA	ERCOT	ERCOT	26 miles	7
NextEra Energy Resources, LLC - Nat. Gas.	N/A	Mission Valley Pipeline Company, LP	NextEra Energy & NextEra Energy Partners	NextEra Energy	NA	ERCOT	ERCOT	0.5 miles	8
NextEra Energy Resources, LLC - Nat. Gas.	N/A	Red Gate Pipeline, LP	NextEra Energy & NextEra Energy Partners	NextEra Energy	NA	ERCOT	ERCOT	26 miles	9
NextEra Energy Resources, LLC - Nat. Gas.	N/A	Mission Natural Gas Company, LLC	NextEra Energy & NextEra Energy Partners	NextEra Energy	NA	MISO	Central	1.3 miles	10



Filing Entity and its Energy Affiliates	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			End Note Number (Enter text in End Note Tab)
						Market / Balancing Authority Area	Geographic Region	Size: (length (miles) and kV)	
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Filing Entity and its Energy Affiliates	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			End Note Number (Enter text in End Note Tab)
						Market / Balancing Authority Area	Geographic Region	Size: (length (miles) and kV)	
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Filing Entity and its Energy Affiliates	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			End Note Number (Enter text in End Note Tab)
						Market / Balancing Authority Area	Geographic Region	Size: (length (miles) and kV)	
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Filing Entity and its Energy Affiliates	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			End Note Number (Enter text in End Note Tab)
						Market / Balancing Authority Area	Geographic Region	Size: (length (miles) and kV)	
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Filing Entity and Its Energy Affiliates	Docket # where MBR authority was granted	Seller Name	Amount of PPA (MW)	Location		Start Date (mo/da/yr)	End Date (mo/da/yr)	End Note Number (Enter text in End Note Tab)
				Market / Balancing Authority Area	Geographic Region			
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End Note Number	List (Generation, PPA or Transmission)	Explanatory Note
1	Generation	NextEra Energy Partners, LP has a 28.5% ownership interest in this facility
2	Generation	NextEra Energy Resources indirectly owns 70 % of this facility. This asset only reports summer capacity values in MISO BAA. The capacity rating used in filing reflects 100% rather than the 70% interest, and will be modified in market based rate filing in the MISO region.
3	Generation	This asset only reports summer capacity values in the MISO BAA.
4	Generation	FPL owns 85 % of this facility.
5	Generation	FPL owns 20 % of this facility.
6	Generation	FPL owns 76 % of this facility.
7	Generation	NextEra Energy Resources indirectly owns 50% of this facility, but is assumed to control 100%.
8	Generation	NextEra Energy Resources indirectly owns 84.3 % of this facility, but is assumed to control 100%.
9	Generation	NextEra Energy Resources indirectly owns 88.2% of this facility.
10	Generation	NextEra Energy Resources indirectly owns 50% of this facility, but is assumed to control 100%.
11	Generation	NextEra Energy Partners, LP has a 28.5% ownership interest in this facility.
12	Generation	NextEra Energy Partners, LP has a 28.5% ownership interest in this facility.
13	Generation	NextEra Energy Partners, LP has a 28.5% ownership interest in this facility.
14	Generation	NextEra Energy Partners, LP has a 28.5% ownership interest in this facility.
15	Generation	NextEra Energy Partners, LP has a 28.5% ownership interest in this facility.
16	Generation	NextEra Energy Partners, LP has a 28.5% ownership interest in this facility. Perrin ranch's nameplate is 99.2 MW, which was previously reported in filings as 100.8 MW, which includes an additional 1.6 MW turbine that was never constructed. Column K now reflects the actual nameplate capacity rating.
17	Generation	NextEra Energy Resources indirectly owns 50% of this facility.
18	Generation	NextEra Energy Resources indirectly owns 50% of this facility.
19	Generation	NextEra Energy Resources indirectly owns 50% of this facility.
20	Generation	NextEra Energy Resources indirectly owns 50% of this facility.
21	Generation	NextEra Energy Resources indirectly owns 50% of this facility.
22	Generation	NextEra Energy Resources indirectly owns 38 % of this facility.
23	Generation	NextEra Energy Resources indirectly owns 46 % of this facility.
24	Generation	NextEra Energy Resources indirectly owns 41 % of this facility.
25	Generation	NextEra Energy Resources indirectly owns 50% of this facility.
26	Generation	NextEra Energy Resources indirectly owns 50% of this facility.
27	Generation	NextEra Energy Resources indirectly owns 50% of this facility.
28	Generation	NextEra Energy Partners, LP has a 28.5% ownership interest in this facility.
29	Generation	NextEra Energy Partners, LP has a 28.5% ownership interest in this facility.
30	Generation	NextEra Energy Partners, LP has a 28.5% ownership interest in this facility.
31	Generation	Sky River's nameplate rating has been reported as 76.9 MW. Due to failures of turbines that are no longer manufactured, the nameplate rating is now 72.5 MW. This change will be reflected in the next MBR filing.
32	Generation	Cabazon's nameplate rating has been reported as 39.7 MW. Due to the failures of a turbine that is no longer manufactured, the nameplate rating is now 39.0 MW. This change will be reflected in the next MBR filing.
33	Generation	NextEra Energy Resources indirectly owns 50% of this facility.
34	Generation	NextEra Energy Resources indirectly owns 50% of this facility.
35	Generation	NextEra Energy Partners, LP has a 28.5% ownership interest in this facility.





End Note Number	List (Generation, PPA or Transmission)	Explanatory Note
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End Note Number	List (Generation, PPA or Transmission)	Explanatory Note
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**Generation**

## Generation Affiliated with Roswell Solar, LLC and Chaves County Solar, LLC in SPP

	Plant Name	Capacity Ratings (MW)		Uncommitted
		Summer	Winter	Capacity (MW)
<b>SPP</b>				
SPP	Roswell Solar	70.0	70.0	-
SPP	Chaves County Solar	70.0	70.0	-
SPP	Cedar Bluff Wind	200.0	200.0	-
SPP	Breckinridge Wind	98.1	98.1	-
SPP	Seiling Wind	200.0	200.0	-
SPP	Seiling Wind II	100.0	100.0	-
SPP	Mammoth Plains Wind	200.0	200.0	-
SPP	Palo Duro Wind	263.0	263.0	-
SPP	Blackwell Wind	59.8	59.8	-
SPP	Cimarron Wind	165.6	165.6	-
SPP	Cowboy Wind (Weatherford)	147.0	147.0	-
SPP	Elk City	98.9	98.9	-
SPP	Elk City II	100.8	100.8	100.8
SPP	Ensign Wind	98.9	98.9	-
SPP	Gray County	112.0	112.0	-
SPP	High Majestic II	79.6	79.6	-
SPP	High Majestic	79.5	79.5	-
SPP	Minco Wind	99.2	99.2	-
SPP	Minco Wind II	100.8	100.8	-
SPP	Minco Wind III	100.8	100.8	-
SPP	Oklahoma Wind	51.0	51.0	-
SPP	Sooner Wind	51.0	51.0	-
SPP	Steele Flats	75.0	75.0	-
<b>Total SPP</b>		<b>2,621.0</b>	<b>2,621.0</b>	<b>100.8</b>

## SPP Pivotal Supplier Analysis

## Part I – Pivotal Supplier Analysis

Applicant-> [NextEra](#)  
 Market -> [SPP](#)  
 Data Year -> [Dec 2012-Nov 2013](#)

Row	Generation	Reference
	Generation Seller and Affiliate Capacity (owned or controlled)	
A	Installed Capacity (from inside the study area)	2,621
A1	Remote Capacity (from outside the study area)	-
B	Long-Term Firm Purchases (from inside the study area)	-
B1	Long-Term Firm Purchases (from outside the study area)	-
C	Long-Term Firm Sales (in and outside the study area)	2,520
D	Uncommitted Capacity Imports	-
	Non-Affiliate Capacity (owned or controlled)	
		Wkp-SPP Report, less Row A (plus Roswell Solar, Chaves County Solar and Cedar Bluff Wind)
E	Installed Capacity (from inside the study area)	82,867
E1	Remote Capacity (from outside the study area)	-
F	Long-Term Firm Purchases (from inside the study area)	2,520
F1	Long-Term Firm Purchases (from outside the study area)	3,592
G	Long-Term Firm Sales (in and outside the study area)	5,308
H	Uncommitted Capacity Imports	-
		153 FERC ¶ 61,318 (2015) (SPP SIL is zero)
I	Study Area Reserve Requirement	1,074
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)	43,194
	Load	
L	Balancing Authority Area Annual Peak Load	46,676
M	Average Daily Peak Native Load in Peak Month	39,504
N	Amount of Line M Attributable to Seller, if any	-
O	Wholesale Load (L-M)	7,172
P	Net Uncommitted Supply (K-O)	36,022
Q	Seller's Uncommitted Capacity (A+A1+B+B1+D-C-J-N)	101
	Result of Pivotal Supplier Screen (Pass if Line Q < Line P) (Fail if Line Q > Line P)	Pass
	Total Imports (Sum D,H), as filed by Seller ->	-
	% of SIL for Seller's imported capacity ->	#DIV/0!
	% of SIL for Other's imported capacity ->	#DIV/0!
		zero denominator
		zero denominator
	SIL value ->	-
	Do Total Imports exceed the SIL value? ->	No
		SIL is zero

SPP Report: Southwest Power Pool, Inc., Docket No. AD10-02-15, Filed June 30, 2015, "Informational Filing of 2015 Simultaneous Import Limit Study for SPP Region".

See, also, Cedar Bluff Wind, LLC, Docket No. ER15-2676-000, Market-based rate application, Accepted by Letter Order Dated November 13, 2015.

## SPP Market Share Analysis

## Part II – Market Share Analysis

Applicant-> NextEra  
 Study Area -> SPP  
 Data Year -> Dec 2012-Nov 2013

Row E	As filed by the Applicant/Seller				Reference
	Winter (MW)	Spring (MW)	Summer (MW)	Fall (MW)	
Seller and Affiliate Capacity (owned, controlled or under LT contract)					
A	2,621	2,621	2,621	2,621	Generation
A1	-	-	-	-	
B	-	-	-	-	
B1	-	-	-	-	
C	2,520	2,520	2,520	2,520	Generation
D	-	-	-	-	Conservatively assumed to be zero
E	-	-	-	-	153 FERC ¶ 61,318 (2015) (SPP SIL is zero)
Capacity Deductions					
F	28,757	27,503	38,104	29,608	Wkp-SPP Report
G	-	-	-	-	
H	28,757	27,503	38,104	29,608	
I	1,027	1,301	1,074	1,074	Wkp-SPP Report
J	-	-	-	-	
K	1,027	1,301	1,074	1,074	
Non-Affiliate Capacity (owned, controlled or under LT contract)					
L	70,961	73,568	82,867	73,022	Wkp-SPP Report, less Row A (plus Roswell Solar, Chaves County Solar and Cedar Bluff Wind)
L1	-	-	-	-	
M	2,520	2,520	2,520	2,520	Offset Row C
M1	2,736	2,640	3,592	2,530	Wkp-SPP Report
N	5,658	5,658	5,308	5,317	Wkp-SPP Report
O	6,002	10,455	953	8,129	Wkp-SPP Report
P	-	-	-	-	153 FERC ¶ 61,318 (2015) (SPP SIL is zero)
Supply Calculation					
Q	34,772	33,810	43,540	33,944	
R	101	101	101	101	
S	34,873	33,911	43,641	34,044	
T	0.3%	0.3%	0.2%	0.3%	
	Pass	Pass	Pass	Pass	
U	0	0	0	0	
V	-	-	-	-	
	No	No	No	No	

SPP Report: Southwest Power Pool, Inc., Docket No. AD10-02-15, Filed June 30, 2015, "Informational Filing of 2015 Simultaneous Import Limit Study for SPP Region"  
 See, also, Cedar Bluff Wind, LLC, Docket No. ER15-2676-000, Market-based rate application, Accepted by Letter Order Dated November 13, 2015.

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			Capacity Rating: Nameplate (MW)	Capacity Rating: Used in Filing (MW)	Capacity Rating: Methodology Used in [X]: (B)Nameplate, (S)Seasonal, (E)EIA, (A)Alternative	End Note Number (Enter text in End Note Tab)
						Market / Balancing Authority Area	Geographic Region	In-Service Date				

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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			Capacity Rating: Nameplate (MW)	Capacity Rating: Used in Filing (MW)	Capacity Rating: Methodology Used in [K]: (B)Nameplate, (S)Seasonal, 5-yr (E)IA, (A)Alternative	End Note Number (Enter text in End Note Tab)
						Market / Balancing Authority Area	Geographic Region	In-Service Date				

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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]: (S)Seasonal, (Y) 5-yr (E)IA, (A)Alternative	End Note Number (Enter text in End Note Tab)
						Market / Balancing Authority Area	Geographic Region					
Cedar Bluff Wind, LLC	ER15-2676	Cedar Bluff	Cedar Bluff Wind, LLC	Cedar Bluff Wind, LLC	N/A	SPP	SPP	11/17/2015	198.7	200	N	
Breckinridge Wind Project, LLC	ER15-1925	Breckinridge Wind	Breckinridge Wind Project, LLC	Breckinridge Wind Project, LLC	N/A	SPP	SPP	8/1/2015	98.1	98.1	N	
Selling Wind, LLC	ER14-2708	Selling Wind	Selling Wind, LLC	Selling Wind, LLC	N/A	SPP	SPP	10/1/2014	198.9	200	N	36
Selling Wind II, LLC	ER14-2709	Selling Wind II	Selling Wind II, LLC	Selling Wind II, LLC	N/A	SPP	SPP	10/1/2014	100.3	100	N	37
Palo Duro Wind Energy, LLC	ER14-2710	Palo Duro	Palo Duro Wind Energy, LLC	Palo Duro Wind Energy, LLC	N/A	SPP	SPP	10/7/2014	249.9	263	N	29
Mammoth Plains Wind Project, LLC	ER14-2707	Mammoth Plains	Mammoth Plains Wind Project, LLC	Mammoth Plains Wind Project, LLC	N/A	SPP	SPP	9/19/2014	198.9	200	N	
Steele Flats Wind Project, LLC	ER13-2474	Steele Flats	Steele Flats Wind Project, LLC	Steele Flats Wind Project, LLC	N/A	SPP	SPP	10/11/2013	198.9	200	N	38
Cimarron Wind Energy, LLC	ER13-712	Cimarron Wind	Cimarron Wind	Cimarron Wind Energy, LLC	12/3/2012	SPP	SPP	10/1/2012	165.6	165.6	N	
Ensign Wind, LLC	ER12-2227	Ensign Wind	Ensign Wind, LLC	Ensign Wind, LLC	N/A	MKEC/SPP	SPP	9/21/2012	98.9	98.9	N	
Minco Wind III, LLC	ER12-1880	Minco Wind III	Minco Wind III, LLC	Minco Wind III, LLC	N/A	SPP	SPP	9/1/2012	100.8	100.8	N	
High Majestic Wind II, LLC	ER12-1228	High Majestic II	High Majestic Wind II, LLC	High Majestic Wind II, LLC	N/A	SPP	SPP	7/1/2012	79.6	79.6	N	
Blackwell Wind, LLC	ER12-569	Blackwell Wind	Blackwell Wind, LLC	Blackwell Wind, LLC	N/A	SPP	SPP	10/1/2012	59.8	59.8	N	
Minco Wind II, LLC	ER11-4428	Minco Wind II	Minco Wind II, LLC	Minco Wind II, LLC	N/A	SPP	SPP	11/8/2011	100.8	100.8	N	
Minco Wind, LLC	ER10-2720	Minco Wind	Minco Wind, LLC	Minco Wind, LLC	N/A	SPP	SPP	11/1/2010	99.2	99.2	N	
Elk City II Wind, LLC	ER11-2037	Elk City II	Elk City II Wind, LLC	Elk City II Wind, LLC	N/A	SPP	SPP	12/1/2010	100.8	100.8	N	
Elk City Wind, LLC	ER10-149	Elk City	Elk City Wind, LLC	Elk City Wind, LLC	N/A	SPP	SPP	11/1/2009	98.9	98.9	N	30
High Majestic Wind Energy Center, LLC	ER10-1	Majestic	High Majestic Wind Energy Center, LLC	High Majestic Wind Energy Center, LLC	N/A	SPP	SPP	12/5/2009	79.5	79.5	N	
Gray County Wind Energy, LLC	ER01-1972	Gray County	Gray County Wind Energy, LLC	Gray County Wind Energy, LLC	N/A	SPP	SPP	11/1/2001	112.2	112	N	
FPL Energy Sooner Wind, LLC	ER03-1333	Sooner Wind	FPL Energy Sooner Wind, LLC	FPL Energy Sooner Wind, LLC	N/A	SPP	SPP	9/1/2003	51	51	N	
FPL Energy Oklahoma Wind, LLC	ER03-1332	Oklahoma Wind	FPL Energy Oklahoma Wind, LLC	FPL Energy Oklahoma Wind, LLC	N/A	SPP	SPP	10/01/2003	51	51	N	
FPL Energy Cowboy Wind, LLC	ER05-487	Cowboy Wind (Weatherford)	FPL Energy Cowboy Wind, LLC	FPL Energy Cowboy Wind, LLC	N/A	SPP	SPP	4/1/2005	147	147	N	

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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]: (B)Nameplate, (S)Seasonal, (5-yr) (E)IA, (A)Alternative	End Note Number (Enter text in End Note Tab)
						Market / Balancing Authority Area	Geographic Region					
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## Exhibit JRS-3

## Part I -- Pivotal Supplier Analysis (Cedar Bluff Wind, LLC)

SPP

Row	Generation	MW	Reference
			December 12- November 13
A	Seller and Affiliate Capacity Installed Capacity	2,621	Exhibit JRS-2
B	Long-Term Firm Purchases		
C	Long-Term Firm Sales	(2,520)	Exhibit JRS-2
D	Imported Power	#REF!	Sum of DC Ties from ERCOT to SPP (820 MW) plus uncommitted capacity from other first-tier markets
	Non-Affiliate Capacity		
E	Installed Capacity	82,727	SPP Report, page 4, less Row A above
F	Long-Term Firm Purchases	6,112	SPP Report, page 4, and offset Row C above
G	Long-Term Firm Sales	(5,308)	SPP Report, page 5
H	Imported Power	-	Assumed to be zero
I	Balancing Authority Area Reserve Requirement	(1,074)	SPP Report, page 5
J	Amount of Line I Attributable to Seller, if any	-	
K	Total Uncommitted Capacity	#REF!	SUM A,B,C,D,E,F,G,H,I,M
	Load		
L	Balancing Authority Area Annual Peak Load	46,676	SPP Report, page 6
M	Average Daily Peak Native Load in Peak Month	(39,504)	SPP Report, page 6
N	Amount of Line M Attributable to Seller, if any	-	
O	Wholesale Load	7,172	Sum L, M
P	Net Uncommitted Supply	#REF!	K-O
Q	Seller's Uncommitted Capacity	#REF!	SUM A,B,C,D,J,N
	Result of Pivotal Supplier Screen	#REF!	(Pass if (Q < P) ); (Fail if Q > P)

SPP Report: Southwest Power Pool, Inc., Docket No. AD10-02-15, Filed June 30, 2015, "Informational Filing of 2015 Simultaneous Import Limit Study for SPP Region".

## Part II -- Market Share Analysis (Cedar Bluff Wind, LLC)

Row		Winter (MW)	Spring (MW)	Summer (MW)	Fall (MW)
	Seller and Affiliate Capacity				
A	Installed Capacity	2,621	2,621	2,621	2,621
B	Long-Term Firm Purchases	-	-	-	-
C	Long-Term Firm Sales	(2,520)	(2,520)	(2,520)	(2,520)
D	Seasonal Average Planned Outages	-	-	-	-
E	Imported Power	#REF!	#REF!	#REF!	#REF!
	Capacity Deductions				
F	Average Peak Native Load in the Season	(28,757)	(27,503)	(38,104)	(29,608)
G	Amount of Line F Attributable to Seller, if any	-	-	-	-
H	Amount of Line F Attributable to Others, if any	(28,757)	(27,503)	(38,104)	(29,608)
I	Balancing Authority Area Reserve Requirement, if any	(1,027)	(1,301)	(1,074)	(1,074)
J	Amount of Line I Attributable to Seller, if any	-	-	-	-
K	Amount of Line I Attributable to Others, if any	(1,027)	(1,301)	(1,074)	(1,074)
	Non-Affiliate Capacity				
L	Installed Capacity	70,821	73,428	82,727	72,882
M	Long-Term Firm Purchases	5,256	5,160	6,112	5,050
N	Long-Term Firm Sales	(5,658)	(5,658)	(5,308)	(5,317)
O	Local Seasonal Average Planned Outages	(6,002)	(10,455)	(953)	(8,129)
P	Uncommitted Capacity Imports	-	-	-	-
	Supply Calculation				
Q	Total Competing Supply	34,632	33,670	43,400	33,804
R	Seller's Uncommitted Capacity	#REF!	#REF!	#REF!	#REF!
S	Total Seasonal Uncommitted Capacity	#REF!	#REF!	#REF!	#REF!
T	Seller's Market Share	#REF!	#REF!	#REF!	#REF!
	Results	#REF!	#REF!	#REF!	#REF!

SPP Report: Southwest Power Pool, Inc., Docket No. AD10-02-15, Filed June 30, 2015, "Informational Filing of 2015 Simulta

SPP

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Reference

December 12- November 13

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Exhibit JRS-2

Exhibit JRS-2

Conservatively assumed to be zero

Sum of DC Ties from ERCOT to SPP (820 MW) plus  
uncommitted capacity from other first-tier markets

SPP Report, page 6

SPP Report, page 5

SPP Report, page 4 less Row A above

SPP Report, page 4 plus offset Row C

SPP Report, page 5

SPP Report, page 5

Assumed to be zero

SUM L,M,N,O,P,H,K

SUM A,B,C,D,E,G,J

SUM Q,R

R/S

Pass if T <20%; Fail if T > 20%

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aneous Import Limit Study for SPP Region".

**SPP Pivotal Supplier**

## Part I -- Pivotal Supplier Analysis

Row		MW
	Seller and Affiliate Capacity	
A	Installed Capacity	
B	Long-Term Firm Purchases	
C	Long-Term Firm Sales	
D	Imported Power	
	Non-Affiliate Capacity	
E	Installed Capacity	85,148
F	Long-Term Firm Purchases	3,592
G	Long-Term Firm Sales	(5,308)
H	Imported Power	
I	Balancing Authority Area Reserve Requirement	(1,074)
J	Amount of Line I Attributable to Seller, if any	-
K	Total Uncommitted Capacity	42,853
	Load	
L	Balancing Authority Area Annual Peak Load	46,676
M	Average Daily Peak Native Load in Peak Month	(39,504)
N	Amount of Line M Attributable to Seller, if any	-
O	Wholesale Load	7,172
P	Net Uncommitted Supply	35,681
Q	Seller's Uncommitted Capacity	-
	Result of Pivotal Supplier Screen	PASS

SPP Report: Southwest Power Pool, Inc., Docket No. AD10-02-15, Filed June 30, 2015,  
See, also, MidAmerican Energy Services, LLC , MBR Application, Docket No. ER15-2211-



## SPP Pivotal Supplier

SPP

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Reference (December 12- November 13)

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SPP Report, page 4

SPP Report, page 4

SPP Report, page 5

SPP Report, page 5

SUM A,B,C,D,E,F,G,H,I,M

SPP Report, page 6

SPP Report, page 6

Sum L, M

K-O

SUM A,B,C,D,J,N

(Pass if  $Q < P$ ); (Fail if  $Q > P$ )

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"Informational Filing of 2015 Simultaneous Import Limit Study for SPP Region"  
000, filed July 15, 2015, accepted by Letter Order, September 11, 2015.

## SPP Market Share

## Part II -- Market Share Analysis

		SPP			
Row		Winter (MW)	Spring (MW)	Summer (MW)	Fall (MW)
	Seller and Affiliate Capacity				
A	Installed Capacity				
B	Long-Term Firm Purchases				
C	Long-Term Firm Sales				
D	Seasonal Average Planned Outages				
E	Imported Power				
	Capacity Deductions				
F	Average Peak Native Load in the Season	(28,757)	(27,503)	(38,104)	(29,608)
G	Amount of Line F Attributable to Seller, if any	-	-	-	-
H	Amount of Line F Attributable to Others, if any	(28,757)	(27,503)	(38,104)	(29,608)
I	Balancing Authority Area Reserve Requirement, if any	(1,027)	(1,301)	(1,074)	(1,074)
J	Amount of Line I Attributable to Seller, if any	-	-	-	-
K	Amount of Line I Attributable to Others, if any	(1,027)	(1,301)	(1,074)	(1,074)
	Non-Affiliate Capacity				
L	Installed Capacity	73,242	75,849	85,148	75,303
M	Long-Term Firm Purchases	2,736	2,640	3,592	2,530
N	Long-Term Firm Sales	(5,658)	(5,658)	(5,308)	(5,317)
O	Local Seasonal Average Planned Outages	(6,002)	(10,455)	(953)	(8,129)
P	Uncommitted Capacity Imports	-	-	-	-
	Supply Calculation				
Q	Total Competing Supply	34,533	33,571	43,301	33,704
R	Seller's Uncommitted Capacity	-	-	-	-
S	Total Seasonal Uncommitted Capacity	34,533	33,571	43,301	33,704
T	Seller's Market Share	0.0%	0.0%	0.0%	0.0%
		PASS	PASS	PASS	PASS

SPP Report: Southwest Power Pool, Inc., Docket No. AD10-02-15, Filed June 30, 2015, "Informational Filing of 2015 Simultaneous Ir See, also, MidAmerican Energy Services, LLC, MBR Application, Docket No. ER15-2211-000, filed July 15, 2015, accepted by Letter O

## SPP Market Share

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Reference  
December 12 - November 13

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SPP Report, page 6

SPP Report, page 5

SPP Report, page 4  
SPP Report, page 4  
SPP Report, page 5  
SPP Report, page 5

SUM L,M,N,O,P,H,K  
SUM A,B,C,D,E,G,J  
SUM Q,R

R/S  
Pass if T < 20%; Fail if T > 20%

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Export Limit Study for SPP Region"  
Order, September 11, 2015.

Data Needs for SPP Market Based Rate Analysis  
Study Period December 1, 2012 to November 30, 2013

SPP Market Installed Capacity

Timeframe	Winter 2012	Spring 2013	Summer 2013	Fall 2013	Data Source Proposed for SPP
<b>Commercial Model</b>	77,089	76,715	77,856	76,003	Market Data for Feb 1, 2013, May 1, 2013, Aug 1, 2013, Nov 1, 2013
Installed Capacity (MW)	73,242	75,849	85,148	75,303	Operations Models for Feb 1, 2013, May 1, 2013, Aug 1, 2013, Nov 1, 2013

SPP Market Long-term Firm Purchases

Timeframe	Winter 2012	Spring 2013	Summer 2013	Fall 2013	Data Source
Purchases (MW)	2,736	2,640	3,593	2,530	Data from Tariff Studies Group - Engineering Dept.
Long-term Firm Transmission Service Reservations (TSRs)	calc	calc	calc	calc	Sum of Yearly Firm Point-to-Point and Network Drive-In TSRs which are confirmed for an entire season & The most navigant to address
Difference	calc	calc	calc	calc	navigant to address

SPP Market Long-term Firm Sales

Timeframe	Winter 2012	Spring 2013	Summer 2013	Fall 2013	Data Source
Sales (MW)	5,658	5,658	5,308	5,317	Data from Tariff Studies Group - Engineering Dept.

Sum of Yearly Firm Point-to-Point and Network Drive-Out TSRs which are confirmed for an entire season and The r

SPP Market Planned Outages

Timeframe	Winter 2012	Spring 2013	Summer 2013	Fall 2013	Data Source
Planned Outages (MW)	6002	10455	953	8129	Data from Operations Engineering Analysis and Support Group

Total number of MW-hours of planned outages divided by the total number of hours in the season. Hourly granula

SPP Market Operating Reserves

Timeframe	Winter 2012	Spring 2013	Summer 2013	Fall 2013	Data Source
Operating Reserves (MW)	1027	1301	1074	1074	Data from Operations Engineering Analysis and Support Group

Summation of each month's regulation, spinning reserve, and contingency reserve requirements.

SPP Market Transmission Loss Factors

Timeframe	Winter 2012	Spring 2013	Summer 2013	Fall 2013	Data Source
Transmission Losses (%)	2.43%	3.00%	2.51%	2.12%	Data from Operations Engineering Analysis and Support Group

Transmission loss factors were obtained from MISO Series Power Flow Models (details in Section 2.7) for each of t

SPP Market Native Load Requirements

Timeframe	Winter 2012	Spring 2013	Summer 2013	Fall 2013	Data Source
Integrated Hourly	28757	27503	38104	29608	Data from Operations Engineering Analysis and Support Group
Instantaneous Max	29227	28191	38527	30087	Data from Operations Engineering Analysis and Support Group
Hourly + Losses	29466	28328	38660	30286	Data from Operations Engineering Analysis and Support Group
Instantaneous + Losses	29938	29037	39494	30725	navigant to address

Native load requirement is defined as the average of daily market peaks for the season.

SPP Market Wholesale Load - Includes Losses

Timeframe	No Losses		Includes Losses		Data Source
	Integrated Hourly	Instantaneous Max	Integrated Hourly	Instantaneous Max	
Peak Month (August 2013)	46675	48844	47848	50070	Data from Operations Engineering Analysis and Support Group
Single Hour Peak	39504	39921	40186	40923	Data from Operations Engineering Analysis and Support Group
Monthly Average	29938	29037	39494	30725	navigant to address
Wholesale Load	7172	8924	7352	9148	navigant to address

average of the daily peak native load demands during the peak month

Submittal 1 - Summary Table of Components Used to Calculate SIL Value

	Winter 2012	Spring 2013	Summer 2013	Fall 2013	Data Source
Incremental transfer capability values (either the <u>First Contingency</u> or <u>Incremental Transfer Capability (ITC)</u> )	2480	3628.6	2016.9	3353.8	Planning Models for Feb 1, 2013, May 1, 2013, Aug 1, 2013, Nov 1, 2013 (From XX_CBA_SIL spreadsheets)
Normal Incremental Transfer Capability (NITC) or equivalent values	802	707	1,765	688	Planning Models for Feb 1, 2013, May 1, 2013, Aug 1, 2013, Nov 1, 2013 (See CBA_Interchange_...text files)
Modeled Net Area Interchange (NAI) including the sum of long-term firm reservations.	2735.6	2639.5	3591.7	2529.7	Planning Models for Feb 1, 2013, May 1, 2013, Aug 1, 2013, Nov 1, 2013 (See CBA_Interchange_...text files)
Sum of the long-term firm transmission reservations	36780.9	36216.5	50280.7	35367.8	Planning Models for Feb 1, 2013, May 1, 2013, Aug 1, 2013, Nov 1, 2013 (See CBA_Interchange_...text files)
Seasonal historical peak load	37710.3	38936.4	25337.1	36836.7	Planning Models for Feb 1, 2013, May 1, 2013, Aug 1, 2013, Nov 1, 2013 (See remaining workbook tabs)
Amount of uncommitted generation modeled in the first-tier area.					

Long-term firm reservation was calculated using firm transaction data from ERAG 2008 & 2009 series area intercha  
Area load in the model was used as approximation

Submittal 2 Long-Term Firm Transmission Reservations.

Description of Remote Resource	Winter 2012	Spring 2013	Summer 2013	Fall 2013	Data Source
AECC	10	10	10	10	Tariff Studies Group - Engineering Dept.
AECCWHTBLUFF	373	225	255	100	
AECI	33.9	30.9	43.4	36.5	
AEP (MISO)	250	250	250	250	
BLAKLEY	143	143	143	143	
CROSSROADS	300	300	300	300	
EDF_PLUMPOINT	50	50	50	50	
EES	427	413	404	402	
ERCOTN	140	140	140	140	
ERCOTN-OKLA	80	80	80	80	
ETECSES2	30	30	30	30	
JBOISES	163	163	163	163	
JBOUNTBUFF	86	55	80	71	
LAGN	50	50	50	50	
LAM345	0	0	101	0	
MEC CB4	100	100	100	100	
MSREP_AECI	11.1	7.8	11.3	8.2	
Plum Point	21.6	60	10	67	
PLUMPOINT	50	0	50	0	
WAPA	0	0	76	0	
WAUE BEPCAVS	77	78	347	78	
WAUE HYDRO	351	265	709	272	
WAUE LES LRS	189	189	189	189	
Total	2735.6	2639.5	3591.7	2529.7	

NOTE: Data is included for the following areas: CSWS, EDE, GRDA, KCPL, LES, MPS, MDW, NPPD, OKGE, OPDD, SECI, SPRM, SPS, SPA, WFEC, and WR.

Study Period: December 1, 2012 to November 30, 2013	Winter (MW)	Spring (MW)	Summer (MW)	Fall (MW)
SIL Study 1 (Primary)	546	1,697	190	1,512

SIL 546 1697 190 1512

## Part I -- Pivotal Supplier Analysis

Row	Generation	MW	
	Seller and Affiliate Capacity		
A	Installed Capacity		
B	Long-Term Firm Purchases		
C	Long-Term Firm Sales		
D	Imported Power		
	Non-Affiliate Capacity		
E	Installed Capacity	85,148	
F	Long-Term Firm Purchases	3,592	
G	Long-Term Firm Sales	(5,308)	
H	Imported Power		
I	Balancing Authority Area Reserve Requirement	(1,074)	
J	Amount of Line I Attributable to Seller, if any	-	#
K	Total Uncommitted Capacity	42,853	
	Load		
L	Balancing Authority Area Annual Peak Load	46,676	
M	Average Daily Peak Native Load in Peak Month	(39,504)	
N	Amount of Line M Attributable to Seller, if any	-	
O	Wholesale Load	7,172	
P	Net Uncommitted Supply	35,681	
Q	Seller's Uncommitted Capacity	-	
	Result of Pivotal Supplier Screen	PASS	

SPP Report: Southwest Power Pool, Inc., Docket No. AD10-02-15, Filed June 30, 2015, "Infor SPP Region"

SPP

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Reference

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December 12- November 13

Generation

Generation

Wkp-Import Allocation

SPP Report, page 4, less Row A above

SPP Data, Long-Term Purchases, and offset Row C above

SPP Data, Long-Term Sales, and offset Row B above

SPP Report, page 11, less Row E above

SPP Data, SPP Market Operating Reserves

SUM A,B,C,D,E,F,G,H,I,M

SPP Data, Integrated Hourly Max

SPP Data, Integrated Hourly Monthly Avg

Sum L, M

K-O

SUM A,B,C,D,J,N

(Pass if  $Q < P$ ); (Fail if  $Q > P$ )

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mational Filing of 2015 Simultaneous Import Limit Study for

## Part II -- Market Share Analysis

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Row		Winter (MW)	Spring (MW)	Summer (MW)	Fall (MW)
	Seller and Affiliate Capacity				
A	Installed Capacity				
B	Long-Term Firm Purchases				
C	Long-Term Firm Sales				
D	Seasonal Average Planned Outages				
E	Imported Power				
	Capacity Deductions				
F	Average Peak Native Load in the Season	(28,757)	(27,503)	(38,104)	(29,608)
G	Amount of Line F Attributable to Seller, if any				
H	Amount of Line F Attributable to Others, if any	(28,757)	(27,503)	(38,104)	(29,608)
I	Balancing Authority Area Reserve Requirement, if any	(1,027)	(1,301)	(1,074)	(1,074)
J	Amount of Line I Attributable to Seller, if any	-	-	-	-
K	Amount of Line I Attributable to Others, if any	(1,027)	(1,301)	(1,074)	(1,074)
	Non-Affiliate Capacity				
L	Installed Capacity	73,242	75,849	85,148	75,303
M	Long-Term Firm Purchases	2,736	2,640	3,592	2,530
N	Long-Term Firm Sales	(5,658)	(5,658)	(5,308)	(5,317)
O	Local Seasonal Average Planned Outages	(6,002)	(10,455)	(953)	(8,129)
P	Uncommitted Capacity Imports				
	Supply Calculation				
Q	Total Competing Supply	34,533	33,571	43,301	33,704
R	Seller's Uncommitted Capacity	-	-	-	-
S	Total Seasonal Uncommitted Capacity	34,533	33,571	43,301	33,704
T	Seller's Market Share	0.0%	0.0%	0.0%	0.0%
	Results	PASS	PASS	PASS	PASS

SPP Report: Southwest Power Pool, Inc., Docket No. AD10-02-15, Filed June 30, 2015, "Informational Filing of 2015 Simulta

P

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Reference

December 12- November 13

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Generation

Generation

Wkp-Import Allocation

SPP Report, page 6

SPP Report, page 5

SPP Report, less Row A above

SPP Report, page 4 plus offset Row C

SPP Report, page 5

SPP Report, page 5

SPP Report, page 11, less Row E above

SUM L,M,N,O,P,H,K

SUM A,B,C,D,E,G,J

SUM Q,R

R/S

Pass if T <20%; Fail if T > 20%

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aneous Import Limit Study for SPP Region"



Document Content(s)

Roswell Solar, LLC TL-FINAL_4_15_2016.PDF.....	1-2
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