

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

Roundtop Energy LLC

)

Docket No. EG14-__-000

**NOTICE OF SELF-CERTIFICATION OF
EXEMPT WHOLESALE GENERATOR STATUS**

Pursuant to Section 1266 of the Public Utility Holding Company Act of 2005 (“PUHCA 2005”),¹ and Section 366.7 of the regulations of the Federal Energy Regulatory Commission (the “Commission”),² Roundtop Energy LLC (“Roundtop”) hereby submits this notice of self-certification (“Notice”) as an exempt wholesale generator (“EWG”) within the meaning of Section 366.1 of the Commission’s regulations.³ In support of this Notice, Roundtop hereby states as follows:

I.

ROUNDTOP NAME AND ADDRESS

The full name and address and principal place of business of Roundtop are as follows:

Roundtop Energy LLC
IMG Midstream LLC
6051 Wallace Road Ext, Suite 100
Wexford, PA 15090

¹ Pub. L. No. 109-58, 119 Stat. 594, § 1266 (Aug. 5, 2005).

² 18 C.F.R. § 366.7 (2014).

³ 18 C.F.R. § 366.1 (2014).

II.

NOTICES AND COMMUNICATIONS

All correspondence and communications concerning the above-captioned proceeding should be addressed to the following persons:⁴

Mark Brozina
Managing Director
IMG Midstream LLC
6051 Wallace Road Ext, Suite 100
Wexford, PA 15090
(877) 260-1339
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III.

DESCRIPTION OF ROUNDTOP

Roundtop is developing and constructing a natural gas-fired electric generation facility, with a nameplate capacity of 22.0 MW and a net output of 21.2 MW, that consists of reciprocating engine-generator sets (the “Facility”). The Facility is located in Susquehanna County, Pennsylvania. The Facility will be interconnected to the transmission system owned by Pennsylvania Electric Company and operated by PJM Interconnection, L.L.C. The Facility is expected to commence commercial operations in mid-2015.

Roundtop is a Delaware limited liability company and a direct, wholly owned subsidiary of IMG Midstream LLC (“IMG Midstream”), a Delaware limited liability company. GEI Iron Mountain Holdco, Inc. (“GEI”), a Delaware corporation, is the managing member of IMG Midstream. COFRA Holdings AG, a Swiss corporation, holds 100 percent of the voting interests

⁴ Roundtop requests waiver of Rule 203(b)(3) of the Commission’s Rules of Practice and Procedure, 18 C.F.R. § 385.203(b)(3) (2014), to the extent necessary to permit more than two persons to be included on the official service list on their behalf in this proceeding.

in GEI through Good Energies II LP, a Jersey limited partnership. GEI is an experienced investor in the development of renewable energy projects across North America, Europe and Asia, including solar, turbine-based renewables, green building technologies and other emerging areas within the clean energy sector. Passive, non-managing membership interests in IMG Midstream are held by Tangibl Development Company II, LLC and an officer and employees of IMG Midstream.

IV.

REPRESENTATIONS REGARDING EWG STATUS

Roundtop makes the following representations in order to demonstrate that it will be an EWG under Section 366.1 of the Commission's regulations.⁵

1. Roundtop will be exclusively engaged in the business of owning and/or operating the Facility and selling electric energy at wholesale, except to the extent that it may engage in certain activities which the Commission has previously determined are incidental to the wholesale sale of electric energy.

2. The Facility will be an "eligible facility" as defined in Section 32(a)(2) of the Public Utility Holding Company Act of 1935, which is incorporated by reference in Section 1262(6) of PUHCA 2005,⁶ and Section 366.1 of the Commission's regulations.⁷ The Facility does not include any transmission or distribution facilities other than those interconnecting transmission facilities necessary to interconnect to the transmission grid and to permit the sale of the output of the Facility at wholesale.

⁵ 18 C.F.R. § 366.1 (2014).

⁶ 42 U.S.C. § 16451(6) (2006).

⁷ 18 C.F.R. § 366.1 (2014).

3. Roundtop is not currently engaged, and has no present plans to engage, in foreign or domestic sales of electricity at retail.

4. All of the electric energy generated by the Facility will be sold exclusively at wholesale within the United States.

5. No portion of the Facility is, or will be, owned or operated by an “electric utility company” that is an “affiliate” or “associate company” of Roundtop.⁸

6. There are no existing lease arrangements involving the Facility under which Roundtop is the lessor.

7. No rate or charge for, and in connection with, the construction of the Facility, or for electric energy produced thereby, was in effect under the laws of any State as of October 24, 1992. As such, no determination or certification by any state commission is necessary prior to certification of Roundtop as an EWG.

8. Roundtop also may engage in the following incidental activities that the Commission has found to be permissible for EWGs: (1) wholesale marketing and brokering of power produced by the Facility and by other facilities;⁹ (2) selling ancillary services from the Facility;¹⁰ (3) trading emission allowances consistent with the Commission’s limitation that an EWG may only engage in such trading so long as the emission allowances were originally obtained in the normal course of operating the Facility;¹¹ (4) engaging in project development activities and related financing activities in connection with the Facility or other facilities;¹² and

⁸ *Id.*

⁹ *See Southern Energy Mktg., Inc.*, 71 FERC ¶ 61,376 at 62,469 (1995).

¹⁰ *See Sithe Framingham LLC*, 83 FERC ¶ 61,106 at 61,504 (1998).

¹¹ *See UGI Development Co.*, 89 FERC ¶ 61,192 at 61,587-88 (1999).

¹² *See AEP Resources, Project Mgmt. Co.*, 74 FERC ¶ 61,202 at 61,674-75 & n.4 (1996).

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