

# ARNOLD PODGORSKY PLLC

1875 I STREET NW, SUITE 500  
WASHINGTON, D.C. 20006

May 2, 2017

The Honorable Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street NE  
Washington, DC 20426

**Re: *WSPP Inc.*, Docket No. ER17-\_\_-000  
Amendments to the WSPP Agreement**

Dear Ms. Bose:

Pursuant to section 205 of the Federal Power Act (“FPA”), 16 U.S.C. § 824d, and section 35.13 of the Federal Energy Regulatory Commission (“Commission”) regulations, 18 C.F.R. § 35.13 (filing of changes in rate schedules, tariffs or service agreements), WSPP Inc. (“WSPP”) respectfully submits with this transmittal letter its proposed amendments to the WSPP Agreement.<sup>1</sup> The proposed amendments revise the List of Members included within the WSPP Agreement to conform to changes in membership, or the names of members, that have occurred since the most recent revision of the List of Members submitted on April 4, 2016, and accepted by the Commission. *WSPP, Inc.*, Letter Order, Docket No. ER16-1339 (May 20, 2016).

## **I. WSPP and the WSPP Agreement**

WSPP is a non-profit organization with approximately 260 electric utility members which transact in bulk electricity markets. WSPP administers the WSPP Agreement, fosters competitive electricity markets, serves as a neutral forum for discussion of market issues, educates and trains members about the WSPP Agreement, energy trading and related matters, and, as required by the Commission, maintains an open access transmission tariff and an OASIS. WSPP’s membership includes all industry sectors: investor-owned utilities, public power districts and

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<sup>1</sup> The current effective WSPP Agreement is on file with the Commission as WSPP Inc., First Revised Rate Schedule FERC No. 6 (“WSPP Agreement”). Baseline filing, Docket No. ER10-1868.

municipal entities, Federal power administrations, rural electric cooperatives, and independent power producing companies.

The WSPP Agreement is a multilateral, Commission-approved enabling agreement for bilateral bulk electric energy transactions. It is used extensively in the West and also in other regions. The Commission-approved terms and conditions contained in the WSPP Agreement facilitate energy transactions between WSPP members without the need for negotiation of separate, bilateral enabling agreements. WSPP members can enter into bilateral transactions under the WSPP Agreement by agreeing to transaction-specific price, quantity, delivery point, and schedule terms, and documenting these terms in a transaction-specific confirmation. Any entity that has the legal authority to buy or sell electric power at wholesale, and staff available on a continuous 24-hour basis to administer WSPP transactions, is eligible to become a WSPP member and transact with other WSPP members under the WSPP Agreement. *WSPP Agreement* § 16.

## **II. Description of the Proposed Tariff Revisions**

The WSPP Agreement includes a List of Members at the back of the agreement. Each member of WSPP is a party to the WSPP Agreement. The List of Members is the FERC-filed formal identification of those parties. As noted above, WSPP submits this amendment of the WSPP Agreement to bring this List of Members up to date.

WSPP membership information changes with some frequency as entities join WSPP and become parties to the WSPP Agreement, or due to name changes, transfers of membership due to corporate restructuring or acquisition, or membership withdrawal or termination. To avoid burdening the Commission with constant filings as these changes occur, WSPP submits annual or twice-annual revisions to the List of Members.<sup>2</sup> The Commission customarily has granted an effective date for each separate change that corresponds to the date of the change of status applicable to the given WSPP member.

While WSPP requests various effective dates, each to correspond with the date of the applicable WSPP member's change of status or name, the metadata for the List of Members included in this filing states an effective date of April 26, 2017, the most recent date requiring a revision to the list.<sup>3</sup> To facilitate review of this filing, WSPP

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<sup>2</sup> The membership roll on WSPP's website, [wspp.org](http://wspp.org), is updated promptly as members inform WSPP of changes in information.

<sup>3</sup> See *WSPP, Inc.*, 151 FERC ¶ 51,106 (2015) at n.33 ("For the list of members, the April 11, 2015 [applicable to that amendment] effective date is for the

includes as Exhibit 1 at the back of this transmittal letter a table specifying each change it proposes to the List of Members in the WSPP Agreement, and for each change, the reason and requested effective date.

Separate, retroactive effective dates are critical particularly for new WSPP members that are public utilities. Section 16.6 of the WSPP Agreement provides that the effective date of membership for these entities is the date approved by the Commission. It states:

An entity shall become a Party to this Agreement and a member of the WSPP upon satisfaction of the requirements in this Section 16 and on the date allowed by FERC if it is a FERC public utility or upon the date of satisfaction of the requirements in this Section 16 if it is not a FERC public utility.

*WSPP Agreement* § 16.6 (emphasis supplied).

As Exhibit 1 specifies, there are eight new WSPP members since WSPP submitted the most recent revision on April 4, 2016. Seven additional entities either changed their names or, in corporate restructures, transferred the membership within their corporate families. Five additional entities withdrew.

### **III. The Proposed Tariff Revisions Are Just and Reasonable**

The amendments to the List of Members are appropriate to assure that the list accurately identifies the parties to the WSPP Agreement. The changes to the list reflect customary changes, such as new memberships, name changes, and other events that occur in the ordinary course of business.

To avoid burdening the Commission with an amendment filing each time a change to membership status occurs, WSPP files omnibus changes to the list once or twice a year, depending on the numbers of changes. The Commission has seen fit to incorporate and use the respective effective dates on which the changes actually occurred.

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metadata. The attached appendix provides the effective date for the change to each specific revision to the affected members.”). Also see *WSPP, Inc.*, Letter Order, Docket No. ER16-1339 (May 20, 2016) (attaching a similar appendix to the Order).

#### **IV. Effective Date**

With respect to the metadata, WSPP proposes an effective date of April 26, 2017, which is the latest date of a revision to the list. For the respective proposed changes to the List of Members, WSPP proposes the respective effective dates specified on Exhibit 1. WSPP requests a waiver of the Commission's notice requirements to permit the proposed changes to become effective on such specified dates and to permit the proposed effective date for the metadata.<sup>4</sup>

Good cause exists for a waiver. Permitting effective dates that correspond to the actual dates of member status changes fosters orderly administration of the WSPP Agreement, including documenting the actual dates that entities became, or ceased to be, parties to the WSPP Agreement. This orderly administration is consistent with the public's interest in efficient bilateral purchases and sales of bulk energy. The Commission previously granted WSPP's similar requests for waiver.<sup>5</sup>

#### **V. Additional Information**

##### **1. Documents Enclosed:**

- (a) This transmittal letter, including Exhibit 1;
- (b) Revised List of Members portion of the WSPP Agreement; and
- (c) A redlined version of the revised List of Members portion of the WSPP Agreement.

##### **2. Names and addresses of persons served with this filing:**

On the same date as this transmittal, a copy of this filing will have been:

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<sup>4</sup> *Central Hudson Gas & Electric Corporation, et al.*, 60 FERC ¶ 61,106, *reh'g denied*, 61 FERC ¶ 61,089 (1992), and *Prior Notice and Filing Requirements Under Part II of the Federal Power Act*, 64 FERC ¶ 61,139, *clarified*, 65 FERC ¶ 61,081 (1993).

<sup>5</sup> *See e.g., WSPP, Inc.*, Letter Order, Docket No. ER16-1339 (May 20, 2016); *WSPP, Inc.*, 151 FERC ¶ 51,106 (2015) at n.33 (cited above); *WSPP, Inc.*, Letter Order, Docket No. ER14-10-000 (November 4, 2013); *WSPP Inc.*, Letter Order, Docket No. ER13-1349-000 (June 6, 2013); *WSPP Inc.*, Letter Order, Docket No. ER13-683-000 (Feb. 5, 2013).

(a) emailed to WSPP members (this service emailing will reach all or virtually all WSPP members); and

(b) posted on the WSPP website: [wspp.org](http://wspp.org).

**3. Waiver of Additional Requirements:**

WSPP respectfully requests a waiver of all applicable requirements, if any, of the Commission's regulations with which this filing does not comply.

**VI. Correspondence and Communications**

Correspondence and communications concerning this filing should be sent to, and WSPP requests the Secretary to include on the official service list, the following:

Arnold Podgorsky  
Arnold Podgorsky PLLC  
1875 I Street, NW, Suite 500  
Washington, DC 20006-5425  
(202) 429-2702 – office  
(703) 217-1827 – mobile  
[apodgorsky@podgorskiylaw.com](mailto:apodgorsky@podgorskiylaw.com)

**VII. Conclusion**

For the reasons stated, the Commission should accept the proposed revisions to the WSPP Agreement to be effective as described above, and grant such additional and further relief as it may determine is appropriate.

Respectfully submitted,

/s/ Arnold Podgorsky  
Arnold Podgorsky

**Attorney for WSPP Inc.**

**Exhibit 1**

**WSPP List of Member Changes Effective  
 After the Most Recent Amendment of the WSPP Agreement  
 Member List, Filed on April 4, 2016**

<b><u>Name</u></b>	<b><u>Revision</u></b>	<b><u>Effective Date</u></b>
BTG Pactual Commodities (US) LLC	Name Change to Engelhart CTP (US) LLC	May 9, 2016
Guzman Renewable Energy Partners	New Member	May 13, 2016
Boston Energy Trading and Marketing LLC	New Member	May 25, 2016
Hermiston Generating Company, L.P.	New Member	June 2, 2016
Utah Municipal Power Agency	New Member	June 21, 2016
Williams Flexible Generation, LLC	Withdrawal	June 22, 2016
Patua Project LLC	Membership Transfer to Patua Acquisition Company, LLC	June 24, 2016
Plumas-Sierra Rural Electric Cooperative	New Member	September 22, 2016
California Clean Power Corporation	Withdrawal/Termination	October 12, 2016
South Mississippi Electric Power Association	Name Change to Cooperative Energy, a Mississippi electric cooperative	November 10, 2016
Sempra Generation LLC	Membership Transfer to Sempra Gas & Power Marketing LLC	December 1, 2016
Noble Americas Energy Solutions LLC	Name change to Calpine Energy Solutions, LLC	December 1, 2016
NextEra Energy Power Marketing, LLC	Name Change to NextEra Energy Marketing, LLC	January 9, 2017
Southern Montana Generation & Transmission Cooperative, Inc.	Withdrawal	February 4, 2017
ArLight Energy Marketing, LLC	Withdrawal	February 4, 2017
Silicon Valley Clean Energy Authority	New Member	February 6, 2017
Peninsula Clean Energy Authority	New Member	February 21, 2017
Canadian Wood Products - Montreal, Inc.	Membership Transfer to CWP Energy, Inc.	March 21, 2017

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<u>Name</u>	<u>Revision</u>	<u>Effective Date</u>
Salton Sea Power L.L.C.	New Member	April 19, 2017
Constellation Energy Services, Inc.	Withdrawal	April 26, 2017

## LIST OF MEMBERS

3 Phases Renewables Inc.  
AEP Energy Partners, Inc.  
Alameda Municipal Power  
Alcoa Power Marketing LLC  
American Electric Power Service Corporation as agent for Indiana Michigan Power Company  
American Electric Power Service Corporation as agent for Public Service Company of Oklahoma and  
Southwestern Electric Power Company  
Anahau Energy, LLC  
Arizona Electric Power Cooperative, Inc.  
Arizona Public Service Company  
Arkansas Electric Cooperative Corp.  
Associated Electric Cooperative, Inc.  
ATCO Power Canada Ltd.  
Avangrid Renewables, LLC  
Avista Corporation  
Basin Electric Power Cooperative  
Black Hills/Colorado Electric Utility Company, L.P.  
Black Hills Wyoming, Inc.  
Black Hills Power Inc.  
BNP Paribas Energy Trading GP  
Bonneville Power Administration  
Boston Energy Trading and Marketing LLC  
BP Energy Company  
Brookfield Energy Marketing LP  
California Department of Water Resources  
California Power Holdings, LLC  
CalPeak Power LLC  
Calpine Energy Services, L.P.  
Calpine Energy Solutions, LLC  
Cargill Power Markets, LLC  
Castleton Commodities Merchant Trading L.P.  
Central Arizona Water Conservation District  
Cheyenne Light, Fuel and Power  
Citigroup Energy Inc.  
City of Anaheim, Public Utilities Dept.  
City of Azusa, California  
City of Banning, California  
City of Burbank, California  
City of Cerritos (Cerritos Electric Utility)  
City of Colton, California  
City of Corona Department of Water and Power  
City of Farmington, New Mexico  
City of Gillette  
City of Glendale, California  
City of Independence, Missouri  
City of Iola, Kansas  
City of Lancaster  
City of Lodi Electric Utility  
City of Moreno Valley, California



City of Palo Alto, California  
City of Pasadena, California  
City of Rancho Cucamonga, California  
City of Redding, California  
City of Riverside, California  
City of Roseville, California  
City of Sikeston, Board of Municipal Utilities  
City of St. George Energy Service Department  
City of Vernon, California  
City of Wathena, Kansas  
Clatskanie People's Utility District  
Cleco Power LLC  
Cleco Utility Group, Inc.  
Colorado River Commission of Nevada  
Colorado Springs Utilities  
Columbia Power Corporation  
Comision Federal de Electricidad  
Commerce Energy, Inc.  
ConocoPhillips Company  
Constellation NewEnergy, Inc.  
Cooperative Energy, a Mississippi electric cooperative  
Covanta Energy Marketing, LLC  
CP Energy Marketing (US) Inc.  
Credit Suisse Energy LLC  
CWP Energy, Inc.  
Deseret G&T  
Direct Energy Business, LLC  
DTE Energy Trading, Inc.  
Dynergy Marketing and Trade, LLC  
Dynergy Power Marketing, LLC  
East Bay Municipal Utility District  
East Texas Electric Cooperative, Inc.  
EDF Trading North America, LLC  
Elk Hills Power, LLC  
El Paso Electric Company  
Empire District Electric Company  
Energy America , LLC  
Energy Keepers, Inc.  
Energy Transfer Group, LLC  
Energy Unlimited, Inc.  
Englehart CTP (US) LLC  
ENMAX Energy Corporation  
ENMAX Energy Marketing Inc.  
Entergy Services, Inc. (also Entergy Arkansas, Inc., Entergy Louisiana, LLC, Entergy Mississippi, Inc.,  
Entergy New Orleans, Inc., Entergy Texas, Inc.)  
Eugene Water & Electric Board  
ETC Endure Energy L.L.C.  
Exelon Generation Company, LLC  
FortisBC Inc.  
Freepoint Commodities LLC  
Freepoint-McMoRan Cooper & Gold Energy Services, LLC

GDF SUEZ Energy Marketing NA, Inc.  
GenOn Energy Management, LLC  
Gila River Power LLC  
Grays Harbor Energy LLC  
Great River Energy  
Golden Spread Electric Cooperative, Inc.  
Golden State Water Company  
Grand River Dam Authority  
Guzman Energy, LLC  
Guzman Renewable Energy Partners  
Harquahala Generating Company, LLC  
Hermiston Generating Company, L.P.  
Hetch Hetchy Water & Power  
Hinson Power Company, Inc.  
Idaho Falls Power  
Idaho Power Company  
Illinois Power Marketing Company  
Imperial Irrigation District  
Inland Empire Energy Center LLC  
J. Aron & Company  
Jonesboro City Water and Light  
J.P. Morgan Ventures Energy Corporation  
Kansas City Board of Public Utilities  
Kansas City Power & Light Company  
Kansas Power Pool  
KCP&L Greater Missouri Operations Company  
La Paloma Generating Company, LLC  
Lafayette Utilities System  
Las Vegas Power Company, LLC  
Lincoln Electric System  
Los Alamos County  
Los Angeles Department of Water and Power  
Louisiana Energy and Power Authority  
Louisville Gas & Electric Company  
Luminant Energy Company LLC  
Macquarie Energy LLC  
Malaga Power, LLC  
Manitoba Hydro  
Marin Clean Energy  
McMinnville Water & Light  
Mercuria Energy America, Inc.  
Merrill Lynch Commodities, Inc.  
Metropolitan Water District of Southern California  
MidAmerican Energy Company  
Midwest Energy, Inc.  
Missouri Joint Municipal Electric Utility Comm.  
Modesto Irrigation District  
Mohave Electric Cooperative, Inc.  
Morgan Stanley Capital Group, Inc.  
M-S-R Public Power Agency  
Municipal Energy Agency of Nebraska

NaturEner Power Watch, LLC  
Navajo Tribal Utility Authority  
Nebraska Public Power District  
NextEra Energy Marketing, LLC  
Nevada Power Company  
Newmont Nevada Energy Investments  
New West Energy  
Nexen Energy Marketing U.S.A. Inc.  
Noble Americas Gas & Power Corp.  
Northern California Power Agency  
Northern States Power Company  
Northern Wasco County People's Utility District  
NorthPoint Energy Solutions Inc.  
NorthWestern Corporation dba NorthWestern Energy  
NRG Power Marketing LLC  
Occidental Power Services, Inc.  
Oklahoma Gas & Electric Company  
Oklahoma Municipal Power Authority  
Omaha Public Power District  
Ontario Power Generation Inc.  
Otter Tail Power Company  
Pacific Gas & Electric Company  
Pacific Summit Energy LLC  
PacifiCorp  
Patua Acquisition Company, LLC  
Peninsula Clean Energy Authority  
PG&E Energy Services  
PG&E Energy Trading - Power, L.P.  
Pittsburg Power Company  
Plumas-Sierra Rural Electric Cooperative  
Plains Electric Generation and Transmission Cooperative, Inc.  
Platte River Power Authority  
PNGC Power  
Port of Oakland  
Portland General Electric  
Power and Water Resources Pooling Authority  
Power Company of America, L.P.  
Power Resources Cooperative  
Powerex Corp.  
Public Service Company of New Mexico  
Public Service Company of Colorado  
Public Utility District No. 1 of Benton County  
Public Utility District No. 1 of Chelan County  
Public Utility District No. 1 of Clark County  
Public Utility District No. 1 of Cowlitz County  
Public Utility District No. 1 of Douglas County  
Public Utility District No. 1 of Franklin County  
Public Utility District No. 1 of Grays Harbor County  
Public Utility District No. 1 of Klickitat County  
Public Utility District No. 1 of Lewis County  
Public Utility District No. 1 of Okanogan County

Public Utility District No. 1 of Pend Oreille County  
Public Utility District No. 1 of Snohomish County  
Public Utility District No. 2 of Grant County  
Public Utility District No. 3 of Mason County  
Puget Sound Energy  
Rainbow Energy Marketing Corporation  
Reliant Energy Services, Inc.  
Renewable Power Strategies LLC dba RPS Advisors  
Rising Tree Wind Farm LLC  
Royal Bank of Canada  
RWE Trading Americas Inc.  
Sacramento Municipal Utility District  
Safeway Inc.  
Saguaro Power Company  
Salt River Project Agricultural Improvement and Power District  
Salton Sea Power L.L.C.  
San Diego Gas & Electric Co.  
San Geronio Farms, Inc.  
Seattle City Light  
Sempra Gas & Power Marketing LLC  
Shell Energy North America (US), L.P.  
Sierra Pacific Power Co.  
Silicon Valley Clean Energy Authority  
Silicon Valley Power  
Silver State Energy Association  
Skylar Energy LP  
Skylar Resources, LP  
Sonoma Clean Power Authority  
Southern Calif. Edison Co.  
Southern California Public Power Authority  
Southern Company Services, Inc., as agent for: Alabama Power Company, Georgia Power Company,  
Gulf Power Company, Mississippi Power Company and Southern Power Company  
Southern Illinois Power Cooperative  
Southern Nevada Water Authority  
Southwestern Power Administration  
Southwestern Public Service Company  
Sulphur Springs Valley Electric Cooperative, Inc.  
Sunflower Electric Power Corp.  
Tacoma Power  
Talen Energy Marketing, LLC  
Talen Montana, LLC  
Teck Metals Ltd.  
Tenaska Power Services Co.  
Tennessee Valley Authority  
TGP Energy Management, LLC  
The Energy Authority, Inc.  
TransAlta Energy Marketing (US) Inc.  
TransCanada Energy Sales Ltd.  
Trico Electric Cooperative, Inc.  
Tri-State Generation and Transmission Association, Inc.  
Tucson Electric Power Company

Turlock Irrigation District  
Twin Eagle Resource Management, LLC  
Union Electric Company d/b/a Ameren Missouri  
Union Power Partners, L.P.  
UNS Electric Inc.  
Utah Associated Municipal Power Systems  
Utah Municipal Power Agency  
Valley Electric Association, Inc.  
Vantage Wind Energy LLC  
Vitol Inc.  
WAPA-Colorado River Storage Project  
WAPA-Desert Southwest Region  
WAPA – Rocky Mountain Region (LAP)  
WAPA-Upper Great Plains Region  
WAPA-Sierra Nevada Region  
Westar Energy, Inc.  
Western Farmers Electric Coop.  
Western Power Services, Inc.  
WTMPA/City of Lubbock (Lubbock Power & Light)

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Idaho Power Company  
Illinois Power Marketing Company  
Imperial Irrigation District  
Inland Empire Energy Center LLC  
J. Aron & Company  
Jonesboro City Water and Light  
J.P. Morgan Ventures Energy Corporation  
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Manitoba Hydro  
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Nevada Power Company  
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Pacific Gas & Electric Company  
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Plumas-Sierra Rural Electric Cooperative  
Plains Electric Generation and Transmission Cooperative, Inc.  
Platte River Power Authority  
PNGC Power  
Port of Oakland  
Portland General Electric  
Power and Water Resources Pooling Authority  
Power Company of America, L.P.  
Power Resources Cooperative  
Powerex Corp.  
Public Service Company of New Mexico  
Public Service Company of Colorado  
Public Utility District No. 1 of Benton County  
Public Utility District No. 1 of Chelan County

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Rising Tree Wind Farm LLC  
Royal Bank of Canada  
RWE Trading Americas Inc.  
Sacramento Municipal Utility District  
Safeway Inc.  
Saguaro Power Company  
Salt River Project Agricultural Improvement and Power District  
[Salton Sea Power L.L.C.](#)  
San Diego Gas & Electric Co.  
San Geronio Farms, Inc.  
Seattle City Light  
~~Sempra Generation, LLC~~  
[Sempra Gas & Power Marketing LLC](#)  
Shell Energy North America (US), L.P.  
Sierra Pacific Power Co.  
[Silicon Valley Clean Energy Authority](#)  
Silicon Valley Power  
Silver State Energy Association  
Skylar Energy LP  
Skylar Resources, LP  
Sonoma Clean Power Authority  
~~South Mississippi Electric Power Association~~  
Southern Calif. Edison Co.  
Southern California Public Power Authority  
Southern Company Services, Inc., as agent for: Alabama Power Company, Georgia Power Company,  
Gulf Power Company, Mississippi Power Company and Southern Power Company  
Southern Illinois Power Cooperative  
~~Southern Montana Electric Generation & Transmission Cooperative, Inc.~~  
Southern Nevada Water Authority  
Southwestern Power Administration  
Southwestern Public Service Company  
Sulphur Springs Valley Electric Cooperative, Inc.  
Sunflower Electric Power Corp.  
Tacoma Power  
Talen Energy Marketing, LLC

Talen Montana, LLC  
Teck Metals Ltd.  
Tenaska Power Services Co.  
Tennessee Valley Authority  
TGP Energy Management, LLC  
The Energy Authority, Inc.  
TransAlta Energy Marketing (US) Inc.  
TransCanada Energy Sales Ltd.  
Trico Electric Cooperative, Inc.  
Tri-State Generation and Transmission Association, Inc.  
Tucson Electric Power Company  
Turlock Irrigation District  
Twin Eagle Resource Management, LLC  
Union Electric Company d/b/a Ameren Missouri  
Union Power Partners, L.P.  
UNS Electric Inc.  
Utah Associated Municipal Power Systems  
[Utah Municipal Power Agency](#)  
Valley Electric Association, Inc.  
Vantage Wind Energy LLC  
Vitol Inc.  
WAPA-Colorado River Storage Project  
WAPA-Desert Southwest Region  
WAPA – Rocky Mountain Region (LAP)  
WAPA-Upper Great Plains Region  
WAPA-Sierra Nevada Region  
Westar Energy, Inc.  
Western Farmers Electric Coop.  
Western Power Services, Inc.  
~~Williams Flexible Generation, LLC~~  
WTMPA/City of Lubbock (Lubbock Power & Light)