



ATTORNEYS AT LAW

May 17, 2018

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

**Re: *WSPP Inc.*, Docket No. ER18-\_\_\_-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 regulations of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. § 35.13 (filing of changes in rate schedules, tariffs or service agreements), WSPP Inc. (“WSPP”) respectfully submits 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 changes to the names of members, that have occurred since the most recent revision of the List of Members submitted May 2, 2017, and accepted by the Commission. *WSPP, Inc.*, Letter Order, Docket No. ER17-1525-000 (June 20, 2017).

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

WSPP is a non-profit organization. It has 282 electric utility members that transact in the bulk electricity markets. WSPP administers the WSPP Agreement, fosters competitive electricity markets, serves as a neutral forum for market issue discussion, 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. WSPP’s membership includes all industry sectors: investor-owned utilities, public power districts and municipal entities, Federal power

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<sup>1</sup> The currently 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.

administrations, rural electric cooperatives, and independent power producing companies.

The WSPP Agreement is a multilateral, Commission-approved agreement which WSPP members may use in bilateral bulk electric energy transactions among themselves. The WSPP Agreement is used extensively in the West as well as other regions. The Commission-approved terms and conditions contained in the WSPP Agreement facilitate energy transactions among WSPP members without the need to negotiate separate, bilateral enabling agreements. WSPP members can enter into these transactions 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.<sup>2</sup>

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

The WSPP Agreement includes a List of Members. Each WSPP Member is a party to the WSPP Agreement. The List of Members is the FERC-filed, formal identification of those parties. WSPP submits this amendment of the WSPP Agreement to bring the List of Members up to date.

The List of Members changes with some frequency, as entities join WSPP and become parties to the WSPP Agreement, withdraw from membership, or due to name changes or membership transfers occurring in corporate restructuring or acquisitions. To avoid burdening the Commission with multiple filings as each change occurs, WSPP submits periodic (generally annual or twice-annual) revisions to the List of Members.<sup>3</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.

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<sup>2</sup> In 2016 WSPP established an Associate Member category. Associate Members are not members of WSPP within the meaning of the WSPP Agreement and, therefore, do not have rights to transact under the WSPP Agreement or participate or vote as members of WSPP's Executive and Operating Committees. Associate Members may attend WSPP meetings and functions at discounted rates.

<sup>3</sup> The membership roll on WSPP's website, [wspp.org](http://wspp.org), is updated promptly as memberships change or members inform WSPP of changes to their representatives or other information.

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 March 26, 2018, the date of the most recent change requiring a revision to the List of Members.<sup>4</sup> To facilitate review of this filing, WSPP includes as Exhibit 1 to this transmittal letter a table specifying each change it proposes to the List of Members, and for each change, the reason and requested effective date.

Separate, retroactive effective dates are critical 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 added).

As Exhibit 1 specifies, there are 13 new WSPP members since WSPP submitted the most recent revision on May 2, 2017. Two other entities changed their names.

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

The amendments to the WSPP Agreement to update the List of Members are appropriate to ensure 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.

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<sup>4</sup> See *WSPP, Inc.*, 151 FERC ¶ 51,106 at n.33 (2015) (“For the list of members, the April 11, 2015 [applicable to that amendment] effective date is for the 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. ER17-1525-000 (June 20, 2017) (attaching a similar appendix to the Order).

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

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

With respect to the metadata, WSPP proposes an effective date of March 26, 2018, which is the latest date of a revision to the List of Members. 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>5</sup>

Good cause exists for a waiver. Permitting effective dates that correspond to the actual dates of membership 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 has consistently granted WSPP's requests for such a waiver.<sup>6</sup>

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

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

- (a) This transmittal letter, including Exhibit 1;
- (b) A clean version of the 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.

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<sup>5</sup> *Central Hudson Gas & Electric Corporation, et al.*, 60 FERC ¶ 61,106, *reh'g denied*, 61 FERC ¶ 61,089 (1992); *Prior Notice and Filing Requirements Under Part II of the Federal Power Act*, 64 FERC ¶ 61,139, *clarified by*, 65 FERC ¶ 61,081 (1993).

<sup>6</sup> *See e.g.*, *WSPP, Inc.*, Letter Order, Docket No. ER17-1525-000 (June 20, 2017); *WSPP, Inc.*, Letter Order, Docket No. ER16-1339-000 (May 20, 2016); *WSPP, Inc.*, 151 FERC ¶ 51,106 at n.33; *WSPP, Inc.*, Letter Order, Docket No. ER14-10-000 (November 4, 2013); *WSPP Inc.*, Letter Order, Docket No. ER13-1349-000 (June 6, 2013).

**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:

- (a) emailed to WSPP members (this service emailing will reach 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  
Podgorsky PLLC  
1875 I Street, NW, Suite 500  
Washington, DC 20006-5425  
(202) 429-2702 – office  
(703) 217-1827 – mobile  
[apodgorsky@podgorskylaw.com](mailto:apodgorsky@podgorskylaw.com)

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Secretary  
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**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 relief as it may determine is appropriate.

Respectfully submitted,

PODGORSKY PLLC

By:

/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 May 2, 2017 and up to  
 May 17, 2018**

<b><u>Name</u></b>	<b><u>Revision</u></b>	<b><u>Effective Date</u></b>
Energy America, LLC	Name Change to Direct Energy Business Marketing, LLC	June 1, 2017
Wellhead Power EXchange, LLC	New Member	July 11, 2017
Aha Macav Power Service	New Member	July 31, 2017
Town of Apple Valley	New Member	July 31, 2017
High Desert Power Project, LLC	New Member	September 13, 2017
Pioneer Community Energy	New Member	September 15, 2017
Placer County Water Agency	New Member	October 16, 2017
Guzman Renewable Energy Partners LLC	Name Change to Guzman Energy Partners LLC	October 18, 2017
California Choice Energy Authority	New Member	October 26, 2017
Commerce Energy, Inc.	Name Change to Just Energy Solutions Inc.	October 16, 2017
Merced Irrigation District	New Member	November 20, 2017
Monterey Bay Community Power Authority	New Member	December 6, 2017
Pilot Power Group, Inc.	New Member	January 18, 2018
East Bay Community Energy Authority	New Member	February 26, 2018
AltaGas Ripon Energy Inc.	New Member	March 6, 2018
Switched On, LLC	New Member	March 26, 2018

## LIST OF MEMBERS

3 Phases Renewables Inc.  
AEP Energy Partners, Inc.  
[Aha Macav Power Service](#)  
Alameda Municipal Power  
Alcoa Power Marketing LLC  
[AltaGas Ripon Energy Inc.](#)  
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 Choice Energy Authority](#)  
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  
Direct Energy Business Marketing, LLC  
DTE Energy Trading, Inc.  
Dynergy Marketing and Trade, LLC  
Dynergy Power Marketing, LLC  
East Bay Community Energy Authority  
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  
Freeport-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 LLC  
Harquahala Generating Company, LLC  
Hermiston Generating Company, L.P.  
Hetch Hetchy Water & Power  
High Desert Power Project, LLC  
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  
Just Energy Solutions Inc.  
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  
Merced Irrigation District  
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.  
[Monterey Bay Community Power Authority](#)  
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.  
[Pilot Power Group, Inc.](#)  
[Pioneer Community Energy](#)  
Pittsburg Power Company  
[Placer County Water Agency](#)  
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.  
[Switched On, LLC](#)

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.  
[Town of Apple Valley](#)  
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  
[Wellhead Power EXchange, LLC](#)  
Westar Energy, Inc.  
Western Farmers Electric Coop.  
Western Power Services, Inc.  
WTMPA/City of Lubbock (Lubbock Power & Light)

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City of Colton, California  
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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.  
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Pioneer Community Energy  
Pittsburg Power Company  
Placer County Water Agency  
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

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Public Utility District No. 1 of Chelan County  
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Public Utility District No. 1 of Cowlitz County  
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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.  
Switched On, LLC  
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.  
Town of Apple Valley  
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  
Wellhead Power EXchange, LLC  
Westar Energy, Inc.  
Western Farmers Electric Coop.  
Western Power Services, Inc.  
WTMPA/City of Lubbock (Lubbock Power & Light)