



Control Number: 14406



Item Number: 737

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PROJECT NO. 14406

REGISTRATION OF POWER
MARKETER PURSUANT TO
SUBSTANTIVE
RULE § 25.105

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PUBLIC UTILITY
COMMISSION
OF TEXAS

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PUBLIC UTILITY COMMISSION
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Galt Power, Inc. – PUCT Power Marketer Registration

Pursuant to the Public Utility Regulatory Act ("PURA") § 35.032 and 16 Tex. Admin. Code § 25.105, Galt Power, Inc. ("GALT") hereby submits this registration as a Power Marketer to the Public Utility Commission of Texas. In support of this registration, GALT provides the following:

- Name and address:

Galt Power, Inc.
1528 Walnut Street, 21st Floor
Philadelphia, PA 19102

- Name, address, and telephone number, fax number, and e-mail address of the person to whom communications should be addressed:

Ian Sneed, Director of Operations

Galt Power, Inc.
1528 Walnut Street, 21st Floor
Philadelphia, PA 19102

Phone: (267) 800-2968

Fax: (215) 875-9490

E-mail: isneed@galtpower.com

- Names and types of businesses of the owners with percentages of ownership;

Galt Power, Inc. is a Delaware s-corporation 100% owned by its corporate officers.

- Each affiliate that buys or sells electricity at wholesale in Texas, sells electricity at retail in Texas, or is an electric or municipally owned utility in Texas
 - N/A

- A description of the location of any facility in Texas used to provide service

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- N/A

- A description of the service provided
 - Galt serves as a Qualified Scheduling Entity (QSE) in ERCOT.

- Copies of all registration information filed with FERC
 - Please see a copy of Galt's approval order issued by FERC attached as Exhibit A.

- Affidavit by an authorized person that the registrant is a power marketer
 - Please see the Affidavit included with this filing.

Exhibit A

Galt Power, Inc. holds FERC Market-Based Rate Authority at Docket ER15-1362-000. A copy of the letter order accepting the revised market-based rate tariff is included with this Exhibit.

AFFIDAVIT

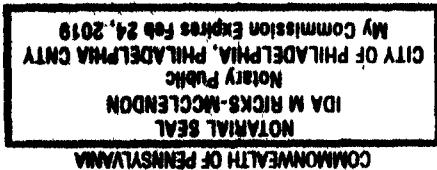
State of Pennsylvania
County of Philadelphia

I, Ian Sneed, Director of Galt Power, Inc. ("GALT"), hereby represent and certify that I have reviewed the registration of GALT as a Power Marketer with the Public Utility Commission of Texas pursuant to 16 Tex. Admin. Code § 25.105, and affirm that the information therein is true, accurate, and correct to the best of my knowledge, information, and belief.



Ian Sneed, Director of Operations

Subscribed and sworn before me this 6th day of April, 2018.



Notary Public

My Commission Expires: 2/24/2019

FEDERAL ENERGY REGULATORY COMMISSION
Washington, D.C. 20426

OFFICE OF ENERGY MARKET REGULATION

In Reply Refer To:
Galt Power, Inc.
Docket No. ER15-1362-000

May 15, 2015

Ms. Kira S. Bryers
Compliance Consultant for Galt Power, Inc.
Customized Energy Solutions, Ltd.
1528 Walnut Street
22nd Floor
Philadelphia, Pennsylvania 19102

Reference: Tariff Revisions and Request for Category 1 Status

Dear Ms. Bryers:

On March 24, 2015, you filed on behalf of Galt Power, Inc. (Galt Power) a revised market-based rate tariff to represent that it is a Category 1 seller in all regions, request waivers commonly granted to similar market-based rate applicants and to make sales of ancillary services at market-based rates.¹

You state that Galt Power meets all of the Category 1 seller criteria in all regions because it owns or controls less than 500 megawatts of generation in aggregate in each region, it does not own and is not affiliated with any entity that owns transmission facilities, it is not affiliated with any franchised public utility, and it does not raise any other vertical market power issues. You also filed a revised market-based rate tariff to

¹ Galt Power requests authorization to sell ancillary services in the markets administered by PJM Interconnection, L.L.C., New York Independent System Operator, Inc., ISO New England Inc., California Independent System Operator Corp., Midcontinent Independent System Operator, Inc., and Southwest Power Pool, Inc. Galt Power also requests authorization to engage in the sale of certain ancillary services as a third-party provider in other markets. *See Third-Party Provision of Ancillary Services; Accounting and Financial Reporting for New Electric Storage Technologies*, Order No. 784, FERC Stats. & Regs. ¶ 31,349, at PP 200-202 (2013), *order on clarification*, Order No. 784-A, 146 FERC ¶ 61,114 (2014).

incorporate the required provisions adopted by the Commission in compliance with Order Nos. 697² and 697-A.³

Galt Power's request for waiver of Part 101 of the Commission's regulations is hereby granted, with the exception that waiver of the provisions of Part 101 that apply to hydropower licensees is not granted with respect to licensed hydropower projects.⁴ Notwithstanding the waiver of the accounting and reporting requirements here, Galt Power is expected to keep its accounting records in accordance with generally accepted accounting principles.

Your filing was noticed on March 24, 2015, with comments, protests or interventions due on or before April 14, 2015. None was filed.

Pursuant to the authority delegated to the Director, Division of Electric Power Regulation - West, under 18 C.F.R. § 375.307, your submittal filed in the referenced docket is accepted for filing, effective May 22, 2015.⁵ You request an effective date of

² *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 PP 914-16, *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. Mont. Consumer Counsel v. FERC*, 659 F.3d 910 (9th Cir. 2011), *cert. denied*, 133 S. Ct. 26 (2012).

³ Order No. 697-A, FERC Stats. & Regs. ¶ 31,268 at PP 384 and 391.

⁴ Hydropower licensees are required to comply with the requirements of the Uniform System of Accounts pursuant to 18 CFR Part 101 to the extent necessary to carry out their responsibilities under Part I of the Federal Power Act (FPA). We further note that a licensee's status as a market-based rate seller under Part II of the FPA does not exempt it from its accounting responsibilities as a licensee under Part I of the FPA. *See Seneca Gen., LLC*, 145 FERC ¶ 61,096, at P 23, n.20 (2013) (citing *Trafalgar Power, Inc.*, 87 FERC ¶ 61,207, at 61,798 (1999) (noting that "all licensees are required to comply with the requirements of the Uniform System of Accounts to the extent necessary to carry out their responsibilities under [s]ections 4(b), 10(d) and 14 of the FPA")).

⁵ We note that Galt Power is not being granted authority to make third-party sales of operating reserves 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. If Galt Power seeks such authority, it must make the required showing and receive Commission authorization prior to making such sales.

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March 1, 2015. Galt Power has not demonstrated good cause to justify waiver of the prior notice requirement for an effective date of March 1, 2015.⁶ Therefore, consistent with Section 205 of the Federal Power Act and 18 C.F.R. § 35.3, these tariff revisions will be effective May 22, 2015, 60 days notice from the date of filing. Based on your representations, Galt Power meets the criteria for a Category 1 seller in all regions and is so designated.⁷

This action does not constitute approval of any service, rate, charge, classification, or any rule, regulation, or practice affecting such rate or service provided for in the filed documents; nor shall such action be deemed as recognition of any claimed contractual right or obligation affecting or relating to such service or rate; and such acceptance is without prejudice to any findings or orders which have been or may hereafter be made by the Commission in any proceeding now pending or hereafter instituted by or against any of the applicant.

This order constitutes final agency action. Requests for rehearing by the Commission may be filed within 30 days of the date of issuance of this order, pursuant to 18 C.F.R. § 385.713.

Questions regarding the above order should be directed to:

Federal Energy Regulatory Commission
Attn: Melissa Lozano
Phone: (202) 502-6267
Office of Energy Market Regulation
888 First Street, N.E.
Washington, D.C. 20426

Sincerely,

Steve P. Rodgers, Director
Division of Electric Power
Regulation - West

⁶ 18 C.F.R. § 35.15 (2014).

⁷ Order No. 697, FERC Stats. & Regs. ¶ 31,252 at PP 848-50.

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