



January 12, 2026

The Honorable Debbie-Anne A. Reese
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: California Independent System Operator Corporation

**Second Amendment of Non-Conforming Service Agreement
No. 457 and Requests for Privileged Treatment and Waiver of
Notice Requirement**

Docket No. ER26- ____ -000

Dear Secretary Reese:

The California Independent System Operator Corporation (CAISO), pursuant to Section 205 of the Federal Power Act and part 35 of regulations of the Federal Energy Regulatory Commission (Commission),¹ submits for filing a ministerial amendment to the Metered Subsystem Aggregator Agreement (MSSAA) among the CAISO, the Northern California Power Agency (NCPA), and the NCPA MSSAA Members (collectively, the Parties). This Amendment No. 2 to the Third Amended and Restated NCPA MSSAA (Amendment) updates the agreement details to reflect the most accurate listing of generating units, load following system resources, and contact information for the Parties. The CAISO respectfully requests privileged treatment for a portion of the amended NCPA MSSAA and waiver of the prior notice requirement to permit these administrative changes to become effective one day after filing (*i.e.*, effective January 13, 2026) through an order issued no later than March 14, 2026.

I. Background and Description of the MSSAA

As provided in the CAISO's Tariff, a metered subsystem (MSS) is a geographically contiguous system that has been operating as an electric utility

¹ 16 U.S.C. § 824d; 18 C.F.R. Part 35. Capitalized terms not otherwise defined herein have the meanings set forth in the Master Definitions Supplement, Appendix A to the CAISO Tariff.

within the CAISO balancing authority and which balances its own loads and resources within its territory.² Each MSS Operator, and each MSS Aggregator, has rights and obligations as provided in the CAISO Tariff and detailed in its executed MSS Agreement. NCPA, and the NCPA MSSAA Members, are long-standing MSS Operators and Aggregators and are familiar with the rights and obligations under their MSSAA to (1) operate their electric resources within the CAISO Control Area, (2) schedule transactions through the CAISO Markets, and (3) meet the operational requirements of the CAISO Tariff.³

The CAISO filed the original MSSAA between the CAISO and NCPA on July 15, 2002 in Docket No. ER02-2321. The MSSAA was designated as Original Service Agreement No. 457 following acceptance by the Commission.⁴ Original Service Agreement No. 457 was twice amended, as documented in the Commission's dockets.⁵

The CAISO filed an Amended and Restated MSSAA between the CAISO and NCPA on December 14, 2004 in Docket No. ER05-333 to accommodate planned changes in control area boundaries and other minor changes and clarifications. The Commission accepted these changes on February 4, 2005.⁶ The Parties submitted Amendment No. 1 in Docket No. ER06-42 on October 14, 2005 to, among other things, (1) delete references to terminated contracts; (2) reflect the creation of a new intertie; and (3) specify certain scheduling timelines associated with the transmission ownership rights for NCPA. The Commission accepted these changes on December 8, 2005.⁷ The Parties submitted Amendment No. 2 in Docket No. ER08-9 on October 1, 2007 to, among other things, provide for update and modification to the (1) points of interconnection, (2) generating units, and (3) contact information. The Commission accepted these changes on November 26, 2007.⁸ The Parties submitted Amendment No.

² See, e.g., CAISO Tariff, Section 4.6 (establishing the relationship between CAISO and generators on a metered subsystem); Section 4.9 (establishing the relationship between CAISO and metered subsystems operators)

³ An MSS Operator owns the Metered Subsystem and the MSS Aggregator represents individual MSS Operators. See CAISO Tariff, Appendix A.

⁴ See *Cal. Indep. Sys. Operator Corp.*, 100 FERC ¶ 61,234 (2002) (explaining that the MSSA is designed to allow non-public utilities to participate in the CAISO markets and finding the matter to be in the public interest as it allowed public power entities to operate within the CAISO system). See also *Cal. Indep. Sys. Operator Corp.*, 102 FERC ¶ 61,146 (2003) (denying a request for rehearing and responding to a request for clarification regarding metered subsystems).

⁵ See Commission Letter Order, Docket No. ER03-119 (Sept. 22, 2003); *Letter Order*, Docket No. ER04-1020 (Sept. 2, 2004).

⁶ See Commission Letter Order, Docket No. ER05-333 (Feb. 4, 2005).

⁷ See Commission Letter Order, Docket No. ER06-42 (Dec. 8, 2005).

⁸ See Commission Letter Order, Docket No. ER08-9 (Nov. 26, 2007).

3 in Docket No. ER08-655 on March 11, 2008 to reflect updates to the generating units. The Commission accepted these changes on May 5, 2008.⁹

The CAISO filed a Second Amended and Restated MSSAA between the CAISO, NCPA, and the NCPA MSSAA Members on November 7, 2008. The Second Amended and Restated MSSAA was designated as Non-Conforming Service Agreement No. 457, coinciding with the effectiveness of the CAISO's Market Redesign and Technology Upgrade (MRTU) Tariff. The Commission accepted the Second Amended and Restated MSSAA on February 11, 2009.¹⁰

The CAISO filed a Third Amended and Restated MSSAA between the CAISO, NCPA, and the NCPA MSSA Members on November 2, 2011. The Third Amended and Restated MSSA aligned the agreement with the new provisions of the CAISO's 2012 grid management charge revisions. The amended and restated agreement also incorporated load-following system resources' self-schedules and associated operational adjustments consistent with the principles of a load-following metered subsystem. The Commission accepted the Third Amended and Restated MSSAA on December 14, 2011.¹¹ The Parties submitted Amendment No. 1 to the Third Amended and Restated MSSA in Docket No. ER14-1789 on April 28, 2014 to align the charge types in the agreement with the CAISO's implementation of Commission Order No. 764. The Commission accepted these changes on May 28, 2014.¹²

II. Purpose of Amendment No. 2 of the Third Amended and Restated NCPA MSSAA

The primary purpose of the Amendment is to update the agreement details to reflect the most accurate listing of generating units, load following system resources, and contact information for the Parties. This Amendment No. 2 specifically includes updates to:

- Schedule 14 – Generating Units and Market-Participating Loads
- Schedule 14(a) – Load Following System Resources
- Schedule 15.1 – Meter Information
- Schedule 17 – Contacts for Notices

⁹ See Commission Letter Order, Docket No. ER08-655 (May 5, 2008).

¹⁰ See Commission Letter Order, Docket No. ER09-259-000 (Feb. 11, 2009).

¹¹ See Commission Letter Order, Docket No. ER12-332-000 (Dec. 14, 2011).

¹² See Commission Letter Order, Docket No. ER14-1789-000 (May 28, 2014).

Both NCPA and the CAISO have executed Amendment No. 2 to the Third Amended and Restated MSSAA. NCPA as the MSSAA Aggregator is authorized by the NCPA MSSAA Members to execute this Amendment No. 2 pursuant to the MSSAA Section 3.4.1 as this Amendment No. 2 is limited to modifications to the Schedules of the MSSAA. Each of Schedule 14, Schedule 14(a), and Schedule 15.1 contain confidential privileged information in their entirety, while Schedule 17 includes some public information. These designations are reflected in the submissions included with this filing.

In the amendments to Schedule 14, the Parties have revised the schedule to include the most up-to-date information for all of the individual Generating Units and market-participating Loads that NCPA or the NCPA MSSAA Members own or control on NCPA's system. Schedule 14 contains confidential information in its entirety and these updates are viewable only in the privileged version of this submission.

In the amendments to Schedule 14(a), the Parties have revised the schedule to include additional load following system resources. As the CAISO explained in its November 2011 submission of the Third Amended and Restated MSSAA, the agreement provides that hour-ahead scheduling process (HASP) self-scheduled energy and operational adjustments will be treated as load following energy for those non-dynamic system resources listed on Schedule 14(a).¹³ The Parties have revised the schedule to include the most up to date information for load following system resources. Schedule 14(a) contains confidential information in its entirety and these additional resources are viewable only in the privileged version of this submission.

In the amendments to Schedule 15.1, the Parties have revised the schedule to include the most up-to-date metering information for the NCPA MSSAA Members. Schedule 15.1 contains confidential information in its entirety and these updates are viewable only in the privileged version of this submission.

In the amendments to Schedule 17, the Parties have revised the contact for notices to reflect the most up-to-date information for the NCPA representatives. These updates are viewable in the public version of this submission, but the email and phone numbers associated with the contacts are redacted in the public version and viewable only in the privileged version of this submission.

III. Request for Privileged Treatment

Consistent with prior submissions, all of Schedules 14, 14(a), and 15.1 are designated as privileged and confidential, as are the personal contact details of

¹³ See, e.g., Transmittal Letter at 3-4, Docket No. ER12-332-000 (Nov. 2, 2011).

the individuals listed in Schedule 17. The CAISO is seeking privileged treatment of the materials under 18 C.F.R. § 388.112 as their public disclosure could impair system operations, unnecessarily reveal sensitive or personal information, and pose security risks to the facilities referenced therein. For these reasons, the CAISO submits that these materials should be exempt from public exposure and should be granted privileged treatment. This request is consistent with past treatment of this information in prior filings.

IV. Effective Date and Request for Waiver

The CAISO respectfully requests that Amendment No. 2 to the Third Amended and Restated NCPA MSSAA included in the instant filing be made effective one day after filing—*i.e.*, effective January 13, 2026. The CAISO also requests that the Commission issue an order accepting the tariff revisions and authorizing that effective date no later than sixty-one days after filing, or by March 14, 2026.

Because the CAISO is requesting tariff revisions become effective fewer than sixty days after this filing, the CAISO respectfully requests the Commission grant waiver of its prior notice requirement to permit the requested effective date.¹⁴ Good cause exists to grant this waiver because granting such a request allows these important changes to be made effective near the start of the annual calendar year, yielding benefit to NCPA and allowing it to maximize effectiveness of its system to the benefit of its members and their ratepayers. The CAISO made a similar waiver request in its prior submissions of amendments to the MSSAA with NCPA, and the Commission approved the request. To the extent necessary, the CAISO respectfully requests that the Commission grant any other waivers of Part 35 of its regulations that may be required in connection with the requested effective date.

¹⁴ Specifically, under Section 35.11 of the Commission's regulations, 18 C.F.R. § 35.11, the CAISO respectfully requests waiver of the notice requirement in section 35.3(a)(1) of the Commission's regulations, 18 C.F.R. § 35.3(a)(1), to permit the effective date requested above.

V. Communications

Under Rule 203(b)(3),¹⁵ the CAISO respectfully requests that all correspondence and other communications about this filing be served upon:

Heather Curlee
Senior Counsel
California Independent System
Operator Corporation
250 Outcropping Way
Folsom, CA 95630
Tel: (916) 963-0654
Fax: (916) 608-7222
Email: hcurlee@caiso.com

VI. Service

Copies of this filing have been served upon NCPA, its members, the California Public Utilities Commission, and all parties on the official service list for the proceeding in which the Commission accepted the Third Amended and Restated MSSAA (Docket No. ER12-332-000). In addition, the filing has been posted on the CAISO Website.

VII. Contents of this filing

Besides this transmittal letter, this filing includes these attachments:

Attachment A	Public version of Amendment No. 2 to Third Amended and Restated NCPA MSSAA
Attachment B	Privileged version of Amendment No. 2 to Third Amended and Restated NCPA MSSAA
Attachment C	Clean public version of revised portions of Third Amended and Restated NCPA MSSAA
Attachment D	Marked public version of revised portions of Third Amended and Restated NCPA MSSAA

¹⁵ 18 C.F.R. § 385.203(b)(3).

Attachment E

Clean privileged version of revised portions of Third Amended and Restated NCPA MSSAA

Attachment F

Marked privileged version of revised portions of Third Amended and Restated NCPA MSSAA

VIII. Conclusion

For the reasons set forth in this filing, the CAISO respectfully requests that the Commission issue an order by March 14, 2026 accepting the revisions to the Third Amended and Restated NCPA MSSAA contained in this filing, effective as of January 13, 2026.

Respectfully submitted,

/s/ Heather Curlee

Roger E. Collanton

General Counsel

Anthony Ivancovich

Deputy General Counsel

Heather Curlee

Senior Counsel

California Independent System

Operator Corporation

250 Outcropping Way

Folsom, CA 95630

Counsel for the California Independent
System Operator

Attachment A – Public version of Amendment No. 2

Second Amendment of Non-Conforming Service Agreement No. 457

California Independent System Operator Corporation

January 12, 2026

**CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION
AND
NORTHERN CALIFORNIA POWER AGENCY
AND
NORTHERN CALIFORNIA POWER AGENCY METERED SUBSYSTEM
AGGREGATOR AGREEMENT MEMBERS**

**Amendment No. 2 to the Third Amended and Restated
NCPA MSS Aggregator Agreement**

This Amendment No. 2 to the Third Amended and Restated NCPA MSS Aggregator Agreement ("Amendment No. 2") is dated this 4th day of December, 2025 and is entered into, by and between:

- (1) **Northern California Power Agency**, a joint powers agency organized under the laws of the State of California, having its registered and principal place of business located at 651 Commerce Drive, Roseville, California 95678 ("NCPA");

and
- (2) **California Independent System Operator Corporation**, a California non-profit public benefit corporation having its principal place of business located in such place in the State of California as the CAISO Governing Board may from time to time designate, 250 Outcropping Way, Folsom, California 95630 (the "CAISO").

and
- (3) **NCPA MSSAA Members**, the subset of NCPA MSS Members that are listed in Schedule 18.

NCPA, the CAISO and the MSSAA Members are hereinafter referred to individually as "Party" or collectively as the "Parties".

Whereas:

- A. The Parties are signatories to the Third Amended and Restated NCPA MSS Aggregator Agreement ("MSSAA"), which was effective January 1, 2012. The

Third Amended and Restated MSSAA replaced the original MSSAA effective September 1, 2002, the First Amended and Restated MSSAA which was effective January 1, 2005, and the Second Amended and Restated MSSAA which was effective March 31, 2009. The Parties subsequently are signatories to the First Amendment to the MSSAA effective May 1, 2014 by FERC's letter Order dated May 28, 2014 in Docket No. ER14-1789-000.

- B.** The Parties desire to amend the Third Amended and Restated MSSAA to incorporate additional load following system resources in Schedule 14(a). The Parties also desire to incorporate previous revisions to Schedule 14 (Generating Units and Market-Participating Loads, Schedule 15.1 (Meter Information), and Schedule 17 (Contacts for Notices) as agreed to by the Parties.
- C.** NCPA as the MSSAA Aggregator is authorized by the MSSAA Members to execute this Amendment No. 2 pursuant to the MSSAA Section 3.4.1 as this Amendment No. 2 is limited to modifications to the Schedules of the MSSAA.
- D.** In all other respects, the Parties intend that the Third Amended and Restated MSSAA remain in full force and effect in accordance with its terms.

NOW THEREFORE, **THE PARTIES AGREE** as follows:

- 1. Effective Date.** This Amendment No. 2 shall be effective on the date accepted for filing and made effective by FERC.
- 2. Termination.** The provisions of this Amendment No. 2 shall remain in full force and effect, unless subsequently amended, until the termination of the Third Amended and Restated MSSAA.
- 3. Amendment to the Agreement.** The Third Amended and Restated MSSAA shall be amended as follows:
 - 3.1** Schedule 14 (Generating Units and Market-Participating Loads) is deleted in its entirety, and the Schedule 14 attached to this Amendment No. 2 is substituted in its place.
 - 3.2** Schedule 14(a) (Load Following System Resources) is deleted in its entirety, and the Schedule 14(a) attached to this Amendment No. 2 is substituted in its place.

- 3.3** Schedule 15.1 (Meter Information) is deleted in its entirety, and the Schedule 15.1 attached to this Amendment No. 2 is substituted in its place.
- 3.4** Schedule 17 (Contacts for Notices) is deleted in its entirety, and the Schedule 17 attached to this Amendment No. 2 is substituted in its place.
- 4.** This Amendment No. 2 constitutes the complete and final agreement of the Parties with respect to the purpose of this Amendment No. 2 as described in the Recitals hereto and supersedes all prior understandings, whether written or oral, with respect to such subject matter.
- 5.** Except as expressly modified in this Amendment No. 2, the Third Amended and Restated MSSAA shall remain in full force and effect in accordance with its terms, and the unmodified provisions of the Third Amended and Restated MSSAA shall apply to any new rights and/or obligations established by this Amendment No. 2.
- 6.** This Amendment No. 2 may be executed in one or more counterparts at different times, each of which shall be regarded as an original and all of which, taken together, shall constitute one and the same agreement.

IN WITNESS WHEREOF, the Parties have caused this Amendment No. 2 to be duly executed by and through their respective authorized representatives as of the date hereinabove written.

CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION

Signed by:
By: Neil Millar
9236FA183EA64FB...
Name: Neil Millar
Title: Vice President Tx Planning and Infrastructure Development
Date: 12/4/2025

NORTHERN CALIFORNIA POWER AGENCY

Signed by:
By: Randy S. Howard
8125C3D4387846D...
Name: Randy S. Howard
Title: General Manager
Date: 12/4/2025

SCHEDULE 14

[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]

SCHEDULE 14(a)

[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]

SCHEDULE 15.1

[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]

SCHEDULE 17
CONTACTS FOR NOTICES

[Section 18.1]

NCPA

Name of Primary Representative:	Mike Whitney
Title:	Supervisor, Industry Restructuring and Interconnection Affairs
Address:	651 Commerce Drive
City/State/Zip Code:	Roseville CA 95678
Email Address:	[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]
Phone:	[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]
Fax No:	[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]
Name of Alternative Representative:	Tony Zimmer
Title:	Assistant General Manager – Power Management
Address:	651 Commerce Drive
City/State/Zip Code:	Roseville CA 95678
Email Address:	[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]
Phone:	[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]
Fax No:	[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]

Name of 2nd Alternative
Representative:

Anish Nand

Title:

Engineer – Power Management

Address:

651 Commerce Drive

City/State/Zip Code:

Roseville CA 95678

Email Address:

**Privileged Material Redacted Pursuant to 18 C.F.R
§388.112]**

Phone:

**[Privileged Material Redacted Pursuant to 18 C.F.R
§388.112]**

Fax No:

**[Privileged Material Redacted Pursuant to 18 C.F.R
§388.112]**

CAISO

Name of Primary Representative:	Regulatory Contracts
Title:	N/A
Address:	250 Outcropping Way
City/State/Zip Code:	Folsom, CA 95630
Email Address:	[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]
Phone:	[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]
Fax No:	[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]
Name of Alternative Representative:	Riddhi Ray
Title:	Manager, Regulatory Contracts
Address:	250 Outcropping Way
City/State/Zip Code:	Folsom, CA 95630
Email Address:	[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]
Phone:	[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]
Fax No:	[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]

**Attachment C – Clean public version of revised portions of Third Amended and
Restated NCPA MSSAA**

Second Amendment of Non-Conforming Service Agreement No. 457

California Independent System Operator Corporation

January 12, 2026

SCHEDULE 14

[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]

SCHEDULE 14(a)

[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]

SCHEDULE 15.1

[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]

SCHEDULE 17
CONTACTS FOR NOTICES

[Section 18.1]

NCPA

Name of Primary Representative:	Mike Whitney
Title:	Supervisor, Industry Restructuring and Interconnection Affairs
Address:	651 Commerce Drive
City/State/Zip Code:	Roseville CA 95678
Email Address:	[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]
Phone:	[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]
Fax No:	[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]
Name of Alternative Representative:	Tony Zimmer
Title:	Assistant General Manager – Power Management
Address:	651 Commerce Drive
City/State/Zip Code:	Roseville CA 95678
Email Address:	[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]
Phone:	[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]
Fax No:	[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]

Name of 2nd Alternative
Representative:

Anish Nand

Title:

Engineer – Power Management

Address:

651 Commerce Drive

City/State/Zip Code:

Roseville CA 95678

Email Address:

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§388.112]**

Phone:

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§388.112]**

Fax No:

**[Privileged Material Redacted Pursuant to 18 C.F.R
§388.112]**

CAISO

Name of Primary Representative:	Regulatory Contracts
Title:	N/A
Address:	250 Outcropping Way
City/State/Zip Code:	Folsom, CA 95630
Email Address:	[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]
Phone:	[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]
Fax No:	[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]
Name of Alternative Representative:	Riddhi Ray
Title:	Manager, Regulatory Contracts
Address:	250 Outcropping Way
City/State/Zip Code:	Folsom, CA 95630
Email Address:	[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]
Phone:	[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]
Fax No:	[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]

**Attachment D – Marked public version of revised portions of Third Amended and
Restated NCPA MSSAA**

Second Amendment of Non-Conforming Service Agreement No. 457

California Independent System Operator Corporation

January 12, 2026

SCHEDULE 17
CONTACTS FOR NOTICES

[Section 18.1]

NCPA

Name of Primary Representative: Mike Whitney ~~Tony Zimmer~~

Title: Supervisor, Industry Restructuring and Interconnection Affairs

Address: 651 Commerce Drive

City/State/Zip Code: Roseville CA 95678

Email Address: **[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]**

Phone: **[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]**

Fax No: **[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]**

Name of Alternative Representative: Tony Zimmer ~~Dave Dockham~~

Title: Assistant General Manager – Power Management

Address: 651 Commerce Drive

City/State/Zip Code: Roseville CA 95678

Email Address: **[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]**

Phone: **[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]**

Fax No: **[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]**

Name of 2nd Alternative

Representative: Anish Nand

Title: Engineer – Power Management

Address: 651 Commerce Drive

City/State/Zip Code: Roseville CA 95678

Email Address: **Privileged Material Redacted Pursuant to 18 C.F.R §388.112]**

Phone: **[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]**

Fax No: **[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]**

CAISO

Name of Primary Representative: Regulatory Contracts ~~Roni L. Reese~~

Title: N/A ~~Senior Contracts Analyst~~

Address: 250 Outcropping Way

City/State/Zip Code: Folsom, CA 95630

Email Address: **[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]**

Phone: **[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]**

Fax No: **[Privileged Material Redacted Pursuant to 18 C.F.R §388.112]**

Name of Alternative Representative: Riddhi Ray ~~Christopher J. Sibley~~

Title: Manager, Regulatory Contracts ~~Lead Contract Negotiator~~

Address: 250 Outcropping Way

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