

June 25, 2015

Christopher Kirkpatrick
Secretary
U.S. Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

Re: *Aspire Commodities Comments to Notice of Proposed Order and Request for Comment on an Application for an Exemptive Order From Southwest Power Pool, Inc. From Certain Provisions of the Commodity Exchange Act Pursuant to the Authority Provided in Section 4(c)(6) of the Act*

Dear Secretary Kirkpatrick:

By Notice of Proposed Order published in the Federal Register on May 21, 2015, the Commodity Futures Trading Commission (“CFTC” or “the Commission”) issued a Proposed Order to respond to an application from Southwest Power Pool, Inc. (“SPP”) to exempt certain Transmission Congestion Rights, Energy Transactions, and Operating Reserve Transactions from the provisions of the Commodity Exchange Act and Commission regulations (“Proposed Order”).¹ The Coalition of Physical Energy Companies (“COPE”)² submitted its comments on the Proposed Order on June 22.³

COPE would like to correct an inaccurate statement regarding the source of its comments to the Proposed Order made by another commenter in this proceeding. In comments filed with the Commission addressing the Proposed Order and the timely comments filed regarding the

¹ Notice of Proposed Order and Request for Comment on an Application for an Exemptive Order From Southwest Power Pool, Inc. From Certain Provisions of the Commodity Exchange Act Pursuant to the Authority Provided in Section 4(c)(6) of the Act, 80 Fed. Reg. 29490 (May 21, 2015).

² The members of COPE are: Apache Corporation; EP Energy LLC; Iberdrola Renewables, LLC; Kinder Morgan, Inc.; MarkWest Energy Partners, L.P.; Shell Energy North America (US), L.P.; SouthStar Energy Services LLC; and Targa Resources. The members of COPE are physical energy companies in the business of producing, processing, and merchandizing energy commodities at retail and wholesale. Several COPE members actively participate in RTO markets.

³ COPE Comments to Notice of Proposed Order and Request for Comment on an Application for an Exemptive Order From Southwest Power Pool, Inc. From Certain Provisions of the Commodity Exchange Act Pursuant to the Authority Provided in Section 4(c)(6) of the Act, filed June 22, 2015.

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Proposed Order by other parties, Aspire Commodities (“Aspire”) refers to positions advocated by “Bracewell & Giuliani” and “Bracewell” regarding the Proposed Order.

Contrary to Aspire’s assertions, Bracewell & Giuliani LLP has not provided any comments in this proceeding; rather, as is clear from reading the as-filed COPE comments on the Proposed Order, the law firm of Bracewell & Giuliani LLP (“B&G”) is counsel to COPE. As such, B&G has assisted COPE in CFTC matters since the initial process to implement the Dodd-Frank Wall Street Reform and Consumer Protection Act (“Dodd-Frank”) began in 2010, including filing dozens of comment letters and appearing on Commission roundtables and other CFTC interactions on behalf of the members of COPE. In all of these activities, as with COPE’s comments filed in this proceeding, B&G’s actions are clearly on behalf of COPE and its members as their counsel.

Respectfully Submitted,

/s/ David M. Perlman

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George D. Fatula

Counsel to

Coalition of Physical Energy Companies