

August 1, 2014

Ms. Melissa Jurgens
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

VIA EMAIL: Secretary@cftc.gov

**Re: Outside Counsel Memorandum in connection with Application for
Exemptive Order Pursuant to Section 4(c)(6) of the Commodity Exchange
Act**

Dear Ms. Jurgens:

Southwest Power Pool, Inc., a Regional Transmission Organization approved by the Federal Energy Regulatory Commission, herewith encloses for filing an outside counsel memorandum, a copy of which has previously been provided to the Commission.

If you have any questions or need further information, please contact me at (501) 614-3368 or jghormley@spp.org. Thank you.

Sincerely,

/s/ Joseph W. Ghormley
Joseph W. Ghormley, Senior Attorney

For Southwest Power Pool, Inc.

cc:
Alicia Lewis
Riva Adriance
Lee Choo
Laura Astrada
Robert Wasserman