

SEP 10 2018

UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF ELECTRICITY DELIVERY AND ENERGY RELIABILITY

Electricity Delivery and
Energy Reliability

IN THE MATTER OF

SAAVI ENERGY SOLUTIONS, LLC

OE Docket No. EA- 461

**APPLICATION OF SAAVI ENERGY SOLUTIONS, LLC
FOR AUTHORIZATION TO
TRANSMIT ELECTRIC ENERGY TO MEXICO**

Saavi Energy Solutions, LLC ("Saavi Energy Solutions", f/k/a "InterGen Energy Solutions, LLC," or "Applicant"),¹ pursuant to Section 202(e) of the Federal Power Act ("FPA"), 16 U.S.C. § 824a(e), and Subpart W of Part 205 of the regulations thereunder, 10 C.F.R. § 205.300, *et. seq.*, hereby files its Application for Authorization to export electricity from the United States ("U.S.") to Mexico for a period of five years. In support of this Application, Saavi Energy Solutions respectfully states as follows:

I.

DESCRIPTION OF SAAVI ENERGY SOLUTIONS AND ITS AFFILIATES

A. Saavi Energy Solutions

The exact legal name of Applicant is Saavi Energy Solutions, LLC. Saavi Energy Solutions is a Delaware limited liability company and a direct, wholly-owned subsidiary of Aztec Energy I B.V. ("IAEI"), which, in turn, is a wholly-owned direct subsidiary of Saavi Energia (UK) Ltd. ("Saavi Energia UK"). Saavi Energia UK is a wholly-owned direct subsidiary of Saavi Energia B.V. ("Saavi Energia BV"). Saavi Energia BV, in turn, is a wholly-owned direct subsidiary of El Aguila Holdings B.V. Saavi Energy Solutions is a power marketer authorized by Federal Energy Regulatory Commission ("FERC") to make sales of electric power at wholesale in interstate commerce at market-based rates.² Saavi Energy Solutions does not own, operate, or control electric generation

¹ On thirty-first day of May, 2018 the Secretary of State of the State of Delaware certificated the amendment of the name of "InterGen Energy Solutions, LLC to "Saavi Energy Solutions, LLC".

² On February 3, 2017, FERC issued an order granting InterGen Energy Solutions, LLC's request for market-based rate authority with an accompanying tariff. The market-based rate tariff provides for the sale of energy, capacity and ancillary services at market-based rates. *InterGen*

facilities or transmission facilities, and does not have a franchised service area. Saavi Energy Solutions currently markets energy, capacity, and ancillary services from generation facilities located in northern Mexico that are owned by the following affiliates:

- **Energia Azteca X, S.A. de C.V.** ("Energia Azteca") is an indirect wholly-owned subsidiary of Saavi Energia UK that is organized and operates under the laws of Mexico. Energia Azteca is an exempt wholesale generator ("EWG")³ that owns and operates La Rosita I, a 750 MW generation facility located near the city of Mexicali, Mexico consists of three gas turbines (1A, 1B and 1C) operated in combined cycle with a steam turbine. The electrical output of unit 1C is interconnected with the California Independent System Operator Corporation ("CAISO") balancing authority area ("BAA") by the 12-mile Baja Line, a 230 kV generation tie-line facility running from La Rosita II to San Diego Gas & Electric Company's ("SDG&E") Imperial Valley substation. Energia Azteca, with Energia de Baja California, S. de R.L. de C.V. ("Energia Baja"), owns the six-mile segment of the Baja Line located in Mexico. As described further below, the U.S. segment of the Baja Line is owned by Baja California Power, Inc. ("Baja Power").
- **Energia Baja – Energia Baja** is an indirect, wholly-owned subsidiary of Saavi Energia UK that is organized and operates under the laws of Mexico. Energia Baja is an EWG⁴ that owns and operates La Rosita II, an approximately 322 MW generation facility located near the city of Mexicali, Mexico (together with La Rosita I, the "Mexicali Facilities"). Like La Rosita I, La Rosita II is interconnected with the CAISO BAA by the Baja Line.

B. Baja Power

Baja Power is an EWG⁵ and an indirect, wholly-owned subsidiary of Saavi Energia UK whose sole business is the ownership and operation of the six-mile, U.S. segment of the Baja Line. The sole purpose of the Baja Line is to interconnect the Mexicali Facilities to the CAISO BAA. FERC has granted Baja Power a waiver of the Open Access Transmission Tariff ("OATT") requirement on the basis that the Baja Line constitutes a limited and discrete transmission facility.⁶ Baja Power has been issued Presidential Permit PP-234-1 by the Department of Energy's Office of Electricity and Energy Reliability, dated April 18, 2005.⁷ The Department of Energy's Office of

Energy Solutions, LLC, Docket No. ER17-527-000 (Feb. 3, 2017) (unpublished letter order). Saavi Energy Solutions filed a notice of succession to InterGen Energy Solutions' market-based tariff on July 17, 2018 in Docket No. ER18-2033-000, with a requested effective date of July 18, 2018.

³ *Energia Azteca X, S.A. de C.V.*, 97 FERC ¶ 62,046 (2001) (granting Energia Azteca EWG status).

⁴ *Energia de Baja Cal., S. de R.L. de C.V.*, 97 FERC ¶ 62,044 (2001) (granting Energia de Baja EWG status).

Electricity and Energy Reliability subsequently issued Presidential Permit No. PP-234-2, dated August 31, 2005, to increase the power limit to 521.5 MW.⁸

Other than the U.S. segment of the Baja Line, Baja Power does not own, operate, or control any generation, transmission, or distribution facilities.

II. COMMUNICATIONS

Communications regarding this application should be addressed to the following:

Esmeralda Viramontes Mayorga
Norma Yurema Alcalá Torres
Saavi Energy Solutions, LLC
Miguel de Cervantes Saavedra 301
Torre Norte, Piso 11
Colonia Granada, Delegación Miguel Hidalgo
Ciudad de México
México C.P. 11520
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norma.alcala@saavienergia.com
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David M. Perlman
Stephen J. Hug
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david.perlman@bracewell.com
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⁵ *Baja Cal. Power, Inc.*, 112 FERC ¶ 62,244 (2005).

⁶ *Baja Cal. Power, Inc.*, 100 FERC ¶ 61,148 (2002). Baja Power also has filed an interconnection services agreement governing the U.S. portion of the Baja Line. *Baja Cal. Power, Inc.*, Docket No. ER02-2065-000 (Aug. 8, 2002) (unpublished letter order) (accepting interconnection services agreement among Baja Power, Energia Azteca and Energia Baja).

⁷ See *Baja Cal. Power, Inc.*, No. PP-234-1 (April 18, 2005).

⁸ See *Baja Cal. Power, Inc.*, No. PP-234-2 (August 31, 2005).

III. **JURISDICTION**

Pursuant to section 202(e) of the FPA, the Department of Energy's Office of Electricity Delivery and Energy Reliability is the sole agency with jurisdiction over the proposed export of electric energy to Mexico.

Saavi Energy Solutions has obtained or will obtain all necessary Mexican federal and provincial authorizations to effect any proposed export that involves electricity sourced in Mexico. No other known federal, state or local government has jurisdiction over the actions to be taken under the authority sought in this Application.

IV. **TECHNICAL DISCUSSION**

By this Application, Saavi Energy Solutions seeks authorization to transmit electric energy, on either a firm or interruptible basis, to Mexico. Saavi Energy Solutions desires to export electrical energy acquired from U.S. generating sources to Mexico over international electric transmission facilities. Transmission to the point of delivery will be arranged by Saavi Energy Solutions over any of the international electric transmission facilities set out in Exhibit C.

Pursuant to Section 202(e) of the FPA, before DOE grants authorization to export electricity, it first evaluates the impact of the export on the reliability of the U.S. electric system. DOE approves an application to export electricity unless it finds that "the proposed transmission would impair the sufficiency of electric supply within the United States," or that "the proposed transmission ... would impede or tend to impede the coordination in the public interest of facilities subject to the jurisdiction of the Commission." 16 U.S.C. § 824(e). In applying these criteria to requests for export authorizations submitted by electric power marketers such as Saavi Energy Solutions, DOE has declined to follow a rigid application of the information filing requirements set forth in DOE's regulations and instead has used a flexible approach to account for the unique nature of power marketers.⁹

⁹ See, e.g., *Morgan Stanley Capital Group Inc.*, No. EA-185-A-CN (Aug. 14, 2000); *NorAm Energy Servs., Inc.*, No. EA-105-CN (Aug. 16, 1996); *MidCon Power Servs. Corp.*, No. EA-114 (July 15, 1996); *USGen Power Servs.*, No. EA-112 (June 27, 1996); *CNG Power Servs. Corp.*, No. EA-110 (June 20, 1996); *Destec Power Servs., Inc.*, No. EA-113 (May 31, 1996).

Saavi Energy Solutions does not own any electric generation or transmission facilities and, as a power marketer, does not hold a franchise or service territory or native load obligation. Moreover, none of Saavi Energy Solutions' affiliates owns any electric transmission facilities other than the limited and discrete interconnection facilities described above and Saavi Energy Solutions is not affiliated with an entity that holds a franchise or service territory. Thus, Saavi Energy Solutions has no "transmission system" of its own on which power exports could have a reliability or stability impact.

Specifically, with respect to the first criterion used to analyze applications to export electricity, Saavi Energy Solutions is a power marketer that will export electricity purchased from electric utilities, federal power marketing agencies, qualifying cogeneration and small power production facilities, independent power producers, and other sellers. As DOE has recognized, the "power purchased by a power marketer is, by definition, surplus to the needs of the selling entities" and "[w]ith no native load obligations, the power marketer is free to sell its power portfolio on the open market domestically or as an export."¹⁰ Thus, an export of electricity "occurring under such circumstances" would not impair the sufficiency of electric supply within the U.S.¹¹

DOE has interpreted the second criterion used to analyze applications to export electricity "primarily as an issue of the operational reliability of the domestic electric transmission system."¹² As noted above, Saavi Energy Solutions does not own or control any electric power supply system in the U.S. Additionally, in making the necessary commercial arrangements and obtaining transmission capacity necessary to export electricity under the authorization requested herein, Saavi Energy Solutions will comply with existing industry procedures for obtaining transmission capacity, including reserving transmission service in accordance with FERC's Open-Access Same-Time Information System ("OASIS") and scheduling delivery of the export with the appropriate Regional Transmission Organization(s) or Independent System Operator(s) and/or BAAs.

Saavi Energy Solutions will schedule its exports from the U.S. in compliance with all applicable reliability criteria, standards and guides as are set out by the North

¹⁰ Order No. EA-216-C at 2.

¹¹ *Id.*

¹² *Id.*

American Electricity Reliability Corporation ("NERC") (or any successor organization), the North American Energy Standards Board (or any successor organization) and regional reliability councils and as applied by U.S. transmission providers.

As noted above, Saavi Energy Solutions is a power marketer, and does not own or operate a transmission system. Accordingly, Saavi Energy Solutions does not have the ability to cause a violation of the terms and conditions contained in the existing authorizations associated with the international transmission facilities identified in Exhibit C. Specifically, Saavi Energy Solutions does not have the ability to cause total exports on Presidential Permit facilities to exceed the authorized instantaneous transmission rate.

V. CONSISTENCY WITH LAWS

Authorization of the exports proposed by Saavi Energy Solutions is consistent with NAFTA and U.S. energy policy and will foster development of a more efficient and competitive North American energy market. Saavi Energy Solutions will conduct all operations pursuant to this Authorization in accordance with the provisions of the FPA and pertinent rules, regulations and orders adopted or issued thereunder, and in conformity with the reliability criteria, standards and guidelines of the NERC, regional reliability councils, and balancing authorities, including any applicable regional transmission organizations or independent system operators. Compliance with these statutes, rules, regulations, and orders will ensure that the proposed transmission will not impede or tend to impede the regional coordination of electric utility planning or operation.

Saavi Energy Solutions believes that DOE is not required to conduct an environmental assessment or an environmental impact statement in connection with this Application and that DOE's approval of this Application is eligible for categorical exclusion under Appendix B to Subpart D, paragraph B4.2 of the revised DOE regulations implementing the National Environmental Policy Act of 1969.

VI. **PROCEDURAL ISSUES**

Saavi Energy Solutions respectfully submits that it satisfies the requirements of Section 202(e) of the FPA and Part 205, Subpart W of DOE's regulations applicable to applications for authorization to transmit electric energy from the United States to Canada. Saavi Energy Solutions respectfully requests waiver of the requirement to file this application six months in advance of the authorization requested herein to allow issuance of an order granting Saavi Energy Solutions' authorization to transmit electric energy to Mexico no later than November 10, 2018.¹³ Saavi Energy Solutions also requests any additional waivers deemed necessary for DOE to issue the order requested herein.

VII. **EXHIBITS**

The following Exhibits are attached hereto:

<u>Exhibit A:</u>	Agreements (Not applicable)
<u>Exhibit B:</u>	Legal Opinion of Saavi Energy Solution's Counsel
<u>Exhibit C:</u>	Transmission System Information (submitted in lieu of maps)
<u>Exhibit D:</u>	Irrevocable Limited Power of Attorney
<u>Exhibit E:</u>	Statement of any Corporate Relationship or Existing Contract which in any way Relates to Control or Fixing of Rates for the Purchase, Sale or Transmission of Electric Energy. (Not applicable)
<u>Exhibit F:</u>	Operating Procedures Regarding Available Capacity and Energy (Not applicable)
<u>Exhibit G:</u>	Verification

¹³ DOE previously has granted authorization to export electric energy from the United States on an expedited basis where the applicant was a power marketer that planned to purchase surplus energy from third parties. *See, e.g., Tenaska Energía de Mexico, S. de R.L. de C.V.*, Order No. EA-417 (June 15, 2016); *Global Pure Energy, LLC*, Order No. EA-390 (Mar. 4, 2014).

VIII.
CONCLUSION

For the foregoing reasons, Saavi Energy Solutions respectfully requests that DOE grant this Application as requested herein. Saavi Energy Solutions is willing to provide any additional information DOE may require to expedite review and approval of this renewal Application.

Respectfully submitted,

/s/ David M. Perlman

David M. Perlman

Stephen J. Hug

Bracewell LLP

2001 M Street N.W., Suite 900

Washington, D.C. 20036

202-828-5800

david.perlman@bracewell.com

stephen.hug@bracewell.com

*Attorneys for Saavi Energy
Solutions, LLC*

September 10, 2018

EXHIBIT A

Agreements

(Not applicable)

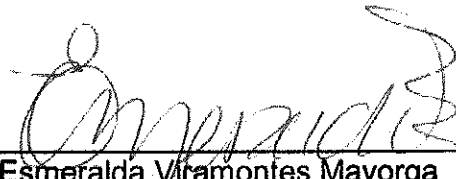
EXHIBIT B

Opinion of Counsel

LEGAL OPINION

The following opinion is given in support of the Application of Saavi Energy Solutions, LLC for Authorization to Transmit Electric Energy to Mexico, dated August 10, 2018.

- 1) I am an attorney at law, authorized to practice law in Mexico, and a registered in-house counsel in Mexico.
- 2) I am Legal Counsel to Saavi Energy Solutions, LLC, a duly formed and validly existing limited liability company, which is in good standing under the laws of the State of Delaware.
- 3) Saavi Energy Solutions, LLC has the power under the Delaware Limited Liability Company Act, its limited liability company agreement and certificate of formation to act in the manner described in this Application.
- 4) To the best of my knowledge and belief, Saavi Energy Solutions, LLC has complied with or is in the process of complying with all Federal and State laws regarding the matters contemplated in the Application.



Esmeralda Viramontes Mayorga
Legal Counsel
Saavi Energy Solutions

EXHIBIT C

Transmission System Information

(submitted in lieu of maps)

**International Electric Transmission Facilities at the
U.S. – Mexico Border Authorized for Third-Party Use for
Saavi Energy Solutions Exports to Mexico**

Present Owner	Location	Voltage	Presidential Permit No.
AEP Texas Central Company	Laredo, TX	138-kV 230-kV	PP-317 PP-317
	Brownsville, TX	138-kV 69-kV	PP-94 PP-94
	Eagle Pass, TX	138-kV	PP-219
Baja California Power, Inc.	Imperial Valley, CA	230-kV	PP-234-1 PP-234-2
Comision Federal de Electricidad	Falcon Dam, TX	138-kV	N/A
	Redford, TX	7.2-kV	PP-51
	Presidio, TX	13.8-kV	PP-03
El Paso Electric Company	Diablo, NM	115-kV	PP-92
	Ascarate, TX	115-kV	PP-48
Generadora del Desierto -- WAPA	San Luis, AZ	230-kV	PP-304
San Diego Gas & Electric	Miguel, CA	230-kV	PP-68
	Imperial Valley, CA	230-kV	PP-79
Sharyland Utilities, Inc.	McAllen, TX	138-kV	PP-285

EXHIBIT D

Irrevocable Limited Power of Attorney



IRREVOCABLE LIMITED POWER OF ATTORNEY

THIS IRREVOCABLE LIMITED POWER OF ATTORNEY is made August 10, 2018 by Saavi Energy Solutions, LLC (the "Principal"), a Delaware limited liability company, with its headquarters at Miguel de Cervantes Saavedra 301, Torre Norte, Piso 11, Col. Granada, Del. Miguel Hidalgo, C.P. 15520, Ciudad de México, México.

1. Appointment. The Principal does hereby appoint Stephen J. Hug, whose principal place of business is at Bracewell LLP, 2001 M Street, NW, Washington, DC, 20036, as the Principal's true and lawful agent and attorney-in-fact ("Attorney-in-fact") for the limited purpose hereinafter set out.
2. Scope of Authority. The Attorney-in-fact shall have the limited power and authority to receive service of process for any and all matters relating to Principal's reporting requirements to the Department of Energy pursuant to Principal's Authority to Transmit Electric Energy from the United States to Mexico.
3. Irrevocability. This Power of Attorney is irrevocable by the Principal.

IN WITNESS WHEREOF, the Principal has caused this Power of Attorney to be duly executed on this 17 day of August 2018.

Saavi Energy Solutions, LLC

By: _____

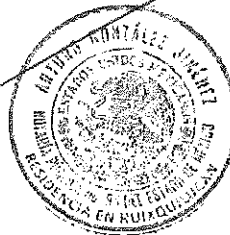
Name: Vicente Farfán García
Title: Vice President

ARTURO GONZÁLEZ JIMÉNEZ, TITULAR DE LA NOTARÍA NÚMERO NOVENTA Y CINCO DEL ESTADO DE MÉXICO, CERTIFICO: QUE EL SEÑOR VICENTE FARFAN GARCÍA, RATIFICA LA FIRMA QUE APARECE EN ESTE DOCUMENTO Y RECONOCE EL CONTENIDO DEL DOCUMENTO QUE CONSTA DE UNA HOJA TAMAÑO CARTA, ESCRITA SÓLO POR EL ANVERSO Y FIRMADA AL FINAL DEL TEXTO, REDACTADO EN IDIOMA DISTINTO AL ESPAÑOL RATIFICANDO SU CONTENIDO, EL CUAL DECLARA CONOCER EN TODOS SUS TÉRMINOS Y MANIFIESTA QUE SU CONTENIDO NO CONTRARÍA NINGUNA LEY NI DISPOSICIÓN VIGENTE EN LOS ESTADOS UNIDOS MEXICANOS.

LO ANTERIOR, CONSTA EN EL INSTRUMENTO NÚMERO VEINTITRÉS MIL SEISCIENTOS VEINTIOCHO, DE FECHA DIECISÉIS DE AGOSTO DEL DOS MIL DIECIOCHO. HUIXQUILUCAN, ESTADO DE MÉXICO, A DIECISIETE DE AGOSTO DEL DOS MIL DIECIOCHO.

DOY FE.

AG/JJC/jcnp







	México	<small>GOBIERNO DEL ESTADO DE MÉXICO SECRETARÍA DE JUSTICIA Y DE DERECHOS HUMANOS SUBSECRETARÍA JURÍDICA Y DE DERECHOS HUMANOS DIRECCIÓN GENERAL DE LEGALIZACIÓN Y DEL PERIÓDICO OFICIAL "GACETA DEL GOBIERNO" DEPARTAMENTO DE LEGALIZACIONES</small>
EDO DE MEX	Apostille	129434
(Convention de La Haye du 5 octobre 1961)		
Derechos		\$ 288.00
No. Orden		129434/2018
En México el presente documento público ha sido firmado por LIC. ARTURO GONZALEZ JIMENEZ		
quien actúa en calidad de NOTARIO PUBLICO NUMERO NOVENTA Y CINCO CON RESIDENCIA EN HUIXQUILUCAN DEL ESTADO DE MEXICO.		
y está revestido del sello correspondiente a ARTURO GONZALEZ JIMENEZ NOTARÍA PÚBLICA NO 95 DEL ESTADO DE MEXICO RESIDENCIA EN HUIXQUILUCAN		
Certificado en		ESTADO DE MEXICO
por		LIC. LUCERO HERNANDEZ SANCHEZ, JEFA DEL DEPARTAMENTO DE LEGALIZACIONES
el		30 de agosto de 2018
		
<small>GOBIERNO DEL ESTADO DE MÉXICO SECRETARÍA DE JUSTICIA Y DE DERECHOS HUMANOS SUBSECRETARÍA JURÍDICA Y DE DERECHOS HUMANOS DIRECCIÓN GENERAL DE LEGALIZACIÓN Y DEL PERIÓDICO OFICIAL "GACETA DEL GOBIERNO" DEPARTAMENTO DE LEGALIZACIONES</small>		

EXHIBIT E

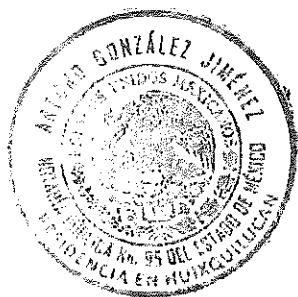
**Statement of any Corporate Relationship or Existing
Contract which in any way Relates to Control or Fixing of Rates
for the Purchase, Sale or Transmission of Electric Energy.**

(Not applicable)

EXHIBIT F

Operating Procedures Regarding Available Capacity and Energy

(Not applicable)



A

EXHIBIT G

Verification

SIN TEXTO



VERIFICATION

Vicente Farfan Garcia, being first duly sworn; states that he is Vice President of Saavi Energy Solutions, LLC; that he is authorized to execute this verification; that he has read the above and foregoing Application and is familiar with the contents thereof; and that all of the statements and facts contained therein, are true and correct to the best of his knowledge, information and belief.



Vicente Farfan Garcia
Vice President

August 17, 2018

ARTURO GONZÁLEZ JIMÉNEZ, TITULAR DE LA NOTARÍA NÚMERO NOVENTA Y CINCO DEL ESTADO DE MÉXICO, **C E R T I F I C O**: QUE EL SEÑOR VICENTE FARFAN GARCÍA, RATIFICA LA FIRMA QUE APARECE EN ESTE DOCUMENTO Y RECONOCE EL CONTENIDO DEL DOCUMENTO QUE CONSTA DE DOS HOJAS TAMAÑO CARTA, ESCRITAS SÓLO POR EL ANVERSO Y FIRMADA AL FINAL DEL TEXTO, REDACTADO EN IDIOMA DISTINTO AL ESPAÑOL RATIFICANDO SU CONTENIDO, EL CUAL DECLARA CONOCER EN TODOS SUS TÉRMINOS Y MANIFIESTA QUE SU CONTENIDO NO CONTRARÍA NINGUNA LEY NI DISPOSICIÓN VIGENTE EN LOS ESTADOS UNIDOS MEXICANOS.

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DOY FE.

AG/JJC/cnpo



R

México
Apostille

GOBIERNO DEL ESTADO DE MÉXICO
ESTADO DE MÉXICO
SECRETARÍA DE ECONOMÍA Y DESARROLLO HUMANO
DIRECCIÓN GENERAL DE LEGALIZACIÓN Y DEL PERIÓDICO OFICIAL "GACETA DEL GOBIERNO"
DEPARTAMENTO DE LEGALIZACIONES

EDO. DE MÉX

(Convention de La Haye du 5 octobre 1961)

Derechos \$ 288.00
No. Orden 129435/2018

En México el presente documento público ha sido firmado por
LIC. ARTURO GONZALEZ JIMENEZ

quien actúa en calidad de NOTARIO PÚBLICO NÚMERO NOVENTA Y CINCO CON
RESIDENCIA EN HUIXQUILUCAN DEL ESTADO DE MÉXICO.

y está revestido del sello correspondiente a ARTURO GONZALEZ JIMENEZ NOTARÍA PÚBLICA
NO. 95 DEL ESTADO DE MÉXICO RESIDENCIA EN HUIXQUILUCAN

Certificado en ESTADO DE MÉXICO por LIC. LUCERO HERNANDEZ SANCHEZ JEFE DEL
DEPARTAMENTO DE LEGALIZACIONES

el 30 de agosto de 2018

ESTADO DE MÉXICO
DIRECCIÓN GENERAL DE LEGALIZACIÓN Y DEL PERIÓDICO OFICIAL "GACETA DEL GOBIERNO"
DEPARTAMENTO DE LEGALIZACIONES

Sello digital: 0A6B81809F4520B19408FC21927CA40307B6D28D1043EBD6039F180287

BRACEWELL US Department of Energy

SEP 10 2018

September 10, 2018

Electricity Delivery and
Energy Reliability

VIA HAND-DELIVERY

Office of Electricity Delivery and Energy
Reliability
OE-20, Room 8G-024
1000 Independence Avenue, S.W.
Washington, D.C.
20585

Attention: Mr. Christopher Lawrence

Re: Application for Authorization to Transmit Electric Energy to Mexico

Dear Mr. Lawrence:

Enclosed for filing on behalf of Saavi Energy Solutions, LLC is an original and five copies of an Application for Authorization to export electricity from the United States to Mexico. Also enclosed is a check in the amount of \$500.00 as the filing fee for this application.

Please do not hesitate to contact me with any questions regarding this application.

Very truly yours,

Bracewell LLP

/s/ Stephen J. Hug

Stephen J. Hug

Bracewell LLP

2001 M Street NW, Suite 900

Washington, D.C. 20036

Phone: (202) 828-5800

Fax: (800) 404-3970

stephen.hug@bracewell.com

Attorney for Saavi Energy Solutions, LLC

Enclosure

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Associate

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BRACEWELL

Office of Electricity Delivery and Energy Reliability
September 10, 2018
Page 2

cc: Esmeralda Viramontes (w/encl.)
Norma Alcala (w/encl.)
Saavi Energy Solutions, LLC

UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF ELECTRICITY DELIVERY AND ENERGY RELIABILITY

SAAVI ENERGY SOLUTIONS, LLC) OE Docket No. EA-_____

APPLICATION OF SAAVI ENERGY SOLUTIONS, LLC
FOR AUTHORIZATION
TO TRANSMIT ELECTRIC ENERGY TO MEXICO

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September 10, 2018