#### BRACEWELL

August 18, 2023

**VIA ELECTRONIC MAIL** 

Attention: Mr. Steven Blazek, Program and Management Analyst Grid Deployment Office U.S. Department of Energy 1000 Independence Avenue, SW Washington, DC 20585

Re: Application of Saavi Energy Solutions, LLC for Renewal of Authorization to Transmit Electric Energy to Mexico, Docket No. EA-461-A

Dear Mr. Blazek:

Enclosed for filing on behalf of Saavi Energy Solutions, LLC ("Saavi Energy Solutions") are an original and two (2) conformed copies of the Application of Saavi Energy Solutions for Renewal of Authorization to Transmit Electric Energy to Mexico and related exhibits ("Renewal Application"). Saavi Energy Solutions has authorized payment in an amount of \$500.00 made payable to the Treasurer of the United States, as required by 10 C.F.R. § 205.309. A copy of the Renewal Application is being served contemporaneously upon the Federal Energy Regulatory Commission as required of wholesale power marketers by 10 C.F.R. § 205.309.

If you have any questions regarding the Renewal Application, or if you require additional information, please contact the undersigned at 202-828-1731.

Respectfully submitted,

Jóshua R. Robichaud

Counsel for Saavi Energy Solutions, LLC

**Enclosures** 

cc: Federal Energy Regulatory Commission

Mr. Joshua R. Robichaud

T:+1.202.828.1731

F: +1.800.404.3970

Associate

2001 M Street NW, Suite 900, Washington, DC 20036-3310

josh.robichaud@bracewell.com bracewell.com

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

)

SAAVI ENERGY SOLUTIONS, LLC

OE Docket No. EA-461-A

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

Joshua R. Robichaud Stephen C. Wald Bracewell LLP 2001 M Street, N.W., Suite 900 Washington, D.C. 20036 202-828-5800 josh.robichaud@bracewell.com stephen.wald@bracewell.com

Daniel Delgado
Liliana Gonzalez
Saavi Energy Solutions, LLC
24 Greenway Plaza
Suite 1205
Houston, Texas 77046
(713) 505-1704
daniel.delgado@saavienergia.com
liliana.gonzalez@saavienergia.com
mexcommgrp@saavienergia.com

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

	)	
IN THE MATTER OF	)	
	)	OE Docket No. EA-461-A
SAAVI ENERGY SOLUTIONS, LLC	)	
	)	

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

Saavi Energy Solutions, LLC ( "Saavi Energy Solutions," f/k/a "InterGen Energy Solutions, LLC," or "Applicant"), 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 Renewal of Authorization ("Renewal Application") 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. <u>DESCRIPTION OF SAAVI ENERGY SOLUTIONS AND ITS AFFILIATES</u>

#### 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 indirect subsidiary of El Aguila Holdings B.V. ("El Aguila Holdings"). El Aguila Holdings is a direct, wholly-owned subsidiary of El Aguila Cooperatief B.V., which is a direct, wholly-owned subsidiary of GIP EM Bronco Luxco S.à.r.l. ("GIP EM Bronco"). All of the equity interests of GIP EM Bronco are owned by GIP EM Bronco Acquisition, L.P., whose sole general partner is GIP EM Bronco Investments S.à.r.l. ("GIP EM

<sup>&</sup>lt;sup>1</sup> 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".

Bronco Investments") and whose limited partnership interests are owned by GIP EM Bronco Co-Investment Fund, L.P. ("GIP EM Bronco Co-Investment") and GIP EM Global Investments S.à.r.l. ("GIP EM Global"). The equity interests of GIP EM Bronco Investments are owned by Global Infrastructure Partners Emerging Markets Fund GP, L.P. ("GIP EM GP"), which is indirectly and wholly-owned by GIM Participation Fund Holding, L.P. The equity interests of GIP EM Bronco Co-Investment are owned by its general partner, GIP EM GP, and a passive limited partner. The equity interests of GIP EM Global are owned by Global Infrastructure Management Participation, LLC.

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.<sup>2</sup> Saavi Energy Solutions does not own, operate, or control electric generation 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")<sup>3</sup> 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").

\_

<sup>&</sup>lt;sup>2</sup> 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 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, which was accepted by FERC effective July 18, 2018.

<sup>&</sup>lt;sup>3</sup> Energia Azteca X, S.A. de C.V., 97 FERC ¶ 62,046 (2001) (granting Energia Azteca EWG status).

• 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 EWG<sup>4</sup> 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.

On November 19, 2018, DOE issued Order No. EA-461 ("Authorization Order") authorizing Saavi Energy Solutions to transmit electric energy from the United States to Mexico as a power marketer.<sup>5</sup> Saavi Energy Solutions' export authorization became effective November 19, 2018, and remains in effect for a period of five (5) years from that date.<sup>6</sup>

#### B. Baja Power

Baja Power is an EWG<sup>7</sup> and an indirect, wholly-owned subsidiary of El Aguila Holdings B.V., 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.<sup>8</sup> Baja Power has been issued Presidential Permit PP-234-1 by the Department of Energy's ("DOE") Office of Electricity and Energy Reliability, dated April 18, 2005.<sup>9</sup> The DOE's Office of 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. <sup>10</sup>

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

<sup>&</sup>lt;sup>4</sup> Energia de Baja Cal., S. de R.L. de C.V., 97 FERC ¶ 62,044 (2001) (granting Energia de Baja EWG status).

<sup>&</sup>lt;sup>5</sup> Saavi Energy Solutions, LLC, Order No. EA-461 (November 19, 2018) (Order Authorizing Electricity Exports to Mexico).

<sup>&</sup>lt;sup>6</sup> *Id*. at 14.

<sup>&</sup>lt;sup>7</sup> Baja Cal. Power, Inc., 112 FERC ¶ 62,244 (2005).

<sup>&</sup>lt;sup>8</sup> 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).

<sup>&</sup>lt;sup>9</sup> See Baja Cal. Power, Inc., No. PP-234-1 (April 18, 2005).

<sup>&</sup>lt;sup>10</sup> See Baja Cal. Power, Inc., No. PP-234-2 (August 31, 2005).

II.

#### **COMMUNICATIONS**

Communications regarding this application should be addressed to the following:

Daniel Delgado Liliana Gonzalez Saavi Energy Solutions, LLC 24 Greenway Plaza Suite 1205 Houston, Texas 77046 (713) 505-1704

daniel.delgado@saavienergia.com liliana.gonzalez@saavienergia.com mexcommgrp@saavienergia.com Joshua R. Robichaud Stephen C. Wald Bracewell LLP 2001 M Street, N.W., Suite 900 Washington, D.C. 20036

202-828-5800 josh.robichaud@bracewell.com stephen.wald@bracewell.com

#### III. JURISDICTION

Pursuant to section 202(e) of the FPA, the Department of Energy's Office of Electricity, Grid Deployment Office 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. RENEWAL AUTHORIZATION AND TECHNICAL DISCUSSION

By this Application, Saavi Energy Solutions seeks renewal 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. The Presidential Permits under which the relevant border facilities were constructed and maintained, and details related thereto, are also set forth 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.<sup>11</sup>

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, as a power marketer, Saavi Energy Solutions will export electricity purchased from electric utilities, qualifying small power production facilities, cogeneration facilities, federal power marketing agencies, and other sellers as those terms are defined in Sections 3(22), (17), (18) and (19) of the FPA. 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

<sup>&</sup>lt;sup>11</sup> 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).

export."<sup>12</sup> Thus, an export of electricity "occurring under such circumstances" would not impair the sufficiency of electric supply within the U.S.<sup>13</sup>

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." 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 set out by the North 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. Saavi Energy Solutions will also make all necessary commercial arrangements and will obtain any and all other regulatory approvals required to effectuate any power exports.

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. Therefore, Saavi Energy Solutions will comply with all the terms and conditions contained in the authorizations issued for the

<sup>&</sup>lt;sup>12</sup> Order No. EA-216-C at 2.

<sup>&</sup>lt;sup>13</sup> *Id*.

<sup>&</sup>lt;sup>14</sup> Id.

cross-border facilities identified in Exhibit C as well as any other export limitations that DOE may deem appropriate, consistent with DOE's orders authorizing exports of electric energy by power marketers.

## V. CONSISTENCY WITH LAWS

Authorization of the exports proposed by Saavi Energy Solutions is consistent with United States-Mexico-Canada Agreement ("USMCA") 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.<sup>15</sup>

## 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 Mexico. In accordance with paragraph (k) of the Authorization Order, this Renewal Application is being filed well in advance of sixty days before the current authorization is set to expire to provide ample time to process the application and provide adequate opportunity for public comment. In addition, Saavi

- 7 -

1

<sup>&</sup>lt;sup>15</sup> See e.g., Saavi Energy Solutions, LLC, Order No. EA-461 at 8 (November 19, 2018) (Order Authorizing Electricity Exports to Mexico).

Energy Solutions requests any additional waivers deemed necessary for DOE to issue the order requested herein.

#### VII. EXHIBITS

The following Exhibits are attached hereto:

Exhibit A: 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)

Exhibit D: Irrevocable Limited Power of Attorney

(Not applicable)

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)

<u>Exhibit F:</u> Operating Procedures Regarding Available Capacity and Energy

(Not applicable)

Exhibit G: Verification

To the extent necessary, Saavi Energy Solutions requests a waiver of the requirement to provide the exhibits that are not applicable to this Renewal Application, as noted above.

Pursuant to 10 C.F.R. § 205.309, a copy of this Renewal Application is being provided to:

#### **Federal Energy Regulatory Commission**

888 First Street, NE

Washington, DC 20426

VIII. **CONCLUSION** 

For the foregoing reasons, Saavi Energy Solutions respectfully requests that DOE

expeditiously consider this Renewal Application for renewal of its blanket authorization to

export electric energy from the United States to Mexico and expeditiously issue an order

renewing Saavi Energy Solutions' authorization to transmit electric energy to Mexico for a

period of five years, effective upon issuance of the order but no later than November 19, 2023.

Respectfully submitted,

/s/ Joshua R. Robichaud

Joshua R. Robichaud

Stephen C. Wald

Bracewell LLP

2001 M Street N.W., Suite 900

Washington, D.C. 20036

(202) 828-5839 (voice)

(800) 404-3970 (fax)

josh.robichaud@bracewell.com

stephen.wald@bracewell.com

Attorneys for Saavi Energy Solutions, LLC

Dated: August 18, 2023

- 9 -

## EXHIBIT A Agreements

## EXHIBIT B Opinion of Legal Counsel



### Mexico City, July 18, 2023 / Ciudad de México, a 18 de julio de 2023

#### **LEGAL OPINION**

The following opinion is given in support of the Renewal Application of Saavi Energy Solutions, LLC for Authorization to Transmit Electric Energy to Mexico, dated July 18, 2023.

- 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.

Mauricio Javier Vives Torres



EN LA CIUDAD DE MEXICO, a los dieciocho días del mes de julio del año dos mil veintitrés, ANTE MI, el LICENCIADO RAFAEL MANUEL OLIVEROS LARA, Notario Público, Titular de la Notaría número cuarenta y cinco de esta Ciudad, compareció MAURICIO JAVIER VIVES TORRES por su propio derecho, y me dijo: Que en términos del Artículo Ciento Treinta y Ocho de la Ley del Notariado para la Ciudad de México, RATIFICA en todas y cada una de sus partes el contenido del presente documento el cual consta de una hoja útil escrita por el anverso y RECONOCE como suya la firma que lo calza por haber sido asentada de su puño y letra, sin necesidad de realizar su traducción al idioma español y sin responsabilidad para el suscrito Notario, toda vez que declaró el compareciente conocer en todos y cada uno de sus términos el contenido del mismo y en lo que éste consiste.- Al efecto levanté el acta número OCHENTA Y CINCO MIL CUATROCIENTOS CINCO, pasada ante mí con esta misma fecha.- DOY FE.





# GOBIERNO DE LA CIUDAD DE MÉXICO CONSEJERÍA JURÍDICA Y DE SERVICIOS LEGALES



Apostille Convention de la Haye du 5 octobre 1961



Derechos \$

110.00

Núm. Orden

61365

En México el presente documento público ha sido firmado por RAFAEL MANUEL OLIVEROS LARA quien actúa en calidad de NOTARIO PUBLICO NO. 45 DE LA CIUDAD DE MÉXICO y está revestido del sello correspondiente a LIC. RAFAEL MANUEL OLIVEROS LARA NOTARIA 45 DISTRITO FEDERAL, MÉXICO. ESTADOS UNIDOS MEXICANOS, ESCUDO NACIONAL Certificado en CIUDAD DE MÉXICO por LIC. JOEL CHAVEZ MARTINEZ JEFE DE UNIDAD DEPARTAMENTAL DE CONSULTAS JURIDICAS DE LA DIRECCIÓN GENERAL JURÍDICA Y DE ESTUDIOS LEGISLATIVOS DE LA CONSEJERÍA JURÍDICA Y DE SERVICIOS LEGALES.

## EXHIBIT C Transmission System Information

Exhibit C – Transmission Lines at the U.S.-Mexico Border Authorized for Third-Party Use

Present Owner	Location	Voltage	Presidential Permit No.
AEP Texas Central Company	Laredo, TX	138 kV	PP-423
· <i>,</i>	Brownsville, TX	230 kV	PP-423
	Eagle Pass, TX	69 kV	PP-425
		138 kV	PP-425
		138 kV	PP-219
Baja California Power, Inc.	Imperial Valley, CA	230 kV	PP-234
Commission Federal de Electricidad	Falcon Dam, TX	138 kV	U.SMex. Treaty
	Redford, TX	7.2 kV	PP-51
	Presidio, TX	12.5 kV	PP-03
	Del Rio, TX	12.0 kV	PP-59
El Paso Electric Company	Diablo, NM	115 kV	PP-92
	Ascarate, TX	115 kV	PP-48
Generadora del Desierto – WAPA	San Luis, AZ	2-230 kV	PP-304
San Diego Gas & Electric	Miguel, CA	2-230 kV	PP-68
	Imperial Valley, CA	2-230 kV	PP-79
Sharyland Utilities, Inc.	McAllen, TX	138 kV	PP-285
Energia Sierra Juarex U.S. Transmission, LLC	Jacumba, CA	2-230 kV	PP-334
Arizona Public Service Company	San Luis, AZ	34 kV	PP-106
UNS	Lochiel, AZ	13.8 kV	PP-40
Nogales Transmission L.L.C.	Nogales, AZ	230 kV	PP-420

## EXHIBIT D Irrevocable Limited Power of Attorney

#### **EXHIBIT E**

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

## EXHIBIT F Operating Procedures Regarding Available Capacity and Energy

## EXHIBIT G Verification

In the Matter of:

Saavi Energy Solutions, LLC

Docket No. EA-461-A

#### **VERIFICATION**

I, Mauricio Javier Vives Torres, being first duly sworn, state that I am the Assistant Secretary and attorney-in-fact of Saavi Energy Solutions, LLC; that I am authorized to execute this verification; that I have read the foregoing Renewal Application of Saavi Energy Solutions, LLC for Authorization to Transmit Electric Energy to Mexico and its exhibits and am familiar with the contents thereof and have knowledge of the matters set forth therein, and hereby verify that the contents thereof and that all of the statements contained therein are true and correct to the best of my knowledge, information and belief.

Mauricio Javier Vives Torres

Mexico City, July 18, 2023 / Ciudad de México, a 18 de julio de 2023

EN LA CIUDAD DE MEXICO, a los dieciocho días del mes de julio del año dos mil veintitrés, ANTE MI, el LICENCIADO RAFAEL MANUEL OLIVEROS LARA, Notario Público, Titular de la Notaría número cuarenta y cinco de esta Ciudad, compareció MAURICIO JAVIER VIVES TORRES por su propio derecho, y me dijo: Que en términos del Artículo Ciento Treinta y Ocho de la Ley del Notariado para la Ciudad de México, RATIFICA en todas y cada una de sus partes el contenido del presente documento el cual consta de una hoja útil escrita por el anverso y RECONOCE como suya la firma que lo calza por haber sido asentada de su puño y letra, sin necesidad de realizar su traducción al idioma español y sin responsabilidad para el suscrito Notario, toda vez que declaró el compareciente conocer en todos y cada uno de sus términos el contenido del mismo y en lo que éste consiste.- Al efecto levanté el acta número OCHENTA Y CINCO MIL CUATROCIENTOS SEIS, pasada ante mí con esta misma fecha.- DOY FE.







LIC. RAFAEL MANUEL OLIVEROS LARA

NOTARIO PUBLICO No. 45

DE LA CIUDAD DE MEXICO



#### GOBIERNO DE LA CIUDAD DE MÉXICO CONSEJERÍA JURÍDICA Y



DE SERVICIOS LEGALES
DIRECCION GENERAL JURIDICA
Y DE ESTUDIO Apostinia ALIVOS
Convention de la Haye du 5 octobre 1961



Derechos \$

110.00

Núm. Orden

61366

En México el presente documento público ha sido firmado por RAFAEL MANUEL OLIVEROS LARA quien actúa en calidad de NOTARIO PUBLICO NO. 45 DE LA CIUDAD DE MÉXICO y está revestido del sello correspondiente a LIC. RAFAEL MANUEL OLIVEROS LARA NOTARIA 45 DISTRITO FEDERAL, MÉXICO. ESTADOS UNIDOS MEXICANOS, ESCUDO NACIONAL Certificado en CIUDAD DE MÉXICO por LIC. JOEL CHAVEZ MARTINEZ JEFE DE UNIDAD DEPARTAMENTAL DE CONSULTAS JURIDICAS DE LA DIRECCIÓN GENERAL JURÍDICA Y DE ESTUDIOS LEGISLATIVOS DE LA CONSEJERÍA JURÍDICA Y