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October 3, 2023

Via Electronic Filing (electricity.exports@hq.doe.gov)

U.S. Department of Energy
Grid Deployment Office
1000 Independence Avenue, SW
Washington, DC 20585

Re: Guzman Energy LLC
Application for Renewal of Authorization to Transmit Electric Energy to Mexico
Docket No. EA-462-A

To the U.S. Department of Energy ("DOE"), Grid Deployment Office:

Pursuant to Section 202(e) of the Federal Power Act, 16 U.S.C. § 824a(e) and 10 C.F.R. § 205.300, *et seq.*, attached for filing in the above-captioned docket is the Application of Guzman Energy LLC ("Guzman Energy") for Renewal of Authorization to Transmit Electric Energy to Mexico (the "Application"). As discussed in the Application, Guzman Energy respectfully requests that DOE renew its existing blanket authorization to transmit electric energy from the United States to Mexico for a term of five (5) years, with an effective date of December 7, 2023, which is the day after Guzman Energy's currently effective authorization expires.

Guzman Energy has electronically submitted the \$500.00 Application filing fee through the DOE General Collections Form on Pay.gov (Tracking ID: 2787BBUM).

Respectfully submitted,

Sarah Tucker

Counsel for Guzman Energy LLC

**UNITED STATES OF AMERICA
BEFORE THE DEPARTMENT OF ENERGY
GRID DEPLOYMENT OFFICE**

Guzman Energy LLC

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Docket No. EA-462-A

**APPLICATION OF GUZMAN ENERGY LLC
FOR RENEWAL OF AUTHORIZATION TO
TRANSMIT ELECTRIC ENERGY TO MEXICO**

Guzman Energy LLC (“Guzman Energy” or “Applicant”) respectfully requests that the Grid Deployment Office of the United States Department of Energy (“DOE”) renew Guzman Energy’s blanket authorization to transmit electric energy from the United States to Mexico for an additional term of five (5) years, with an effective date of December 7, 2023, which is the day after Applicant’s currently effective authorization expires. Guzman Energy submits this Application pursuant to Section 202(e) of the Federal Power Act (“FPA”), 16 U.S.C. 824a(e), and 10 C.F.R. § 205.300, *et seq.*

Guzman Energy is currently authorized to export electricity to Mexico over any authorized international transmission facility that is appropriate for open access transmission by third parties, pursuant to the export authorization issued by DOE on December 6, 2018 in Order No. EA-462 (“Export Order”). Guzman Energy is authorized to export electricity to Mexico pursuant to the Export Order and subject to the limits and conditions identified in the Export Order.

Pursuant to the terms of the Export Order, Guzman Energy’s current electricity export authorization will expire on December 6, 2023. Therefore, Guzman Energy respectfully requests action on this Application and renewed export authorization on or before December 6, 2023, with an effective date of December 7, 2023.

I. DESCRIPTION OF APPLICANT

Applicant is a wholly owned direct subsidiary of Guzman Energy Group LLC, a Delaware limited liability company based in Denver, Colorado. Guzman Energy provides, through various subsidiaries and affiliates, a wide spectrum of wholesale electric and energy-related products and services to a diverse range of customers. Applicant has received blanket authority from the Federal Energy Regulatory Commission to sell wholesale energy, capacity and/or ancillary services at market-based rates (“Market-Based Rate Tariff”).¹ Applicant is a power marketer. Applicant is not a franchised public utility with a transmission or distribution system and does not have captive customers.

II. INFORMATION REQUIRED PURSUANT TO 10 C.F.R. § 205.302

A. Exact legal name of Applicant.

Guzman Energy LLC

B. Exact legal name of all partners.

Not applicable. The upstream corporate ownership of Applicant is described in Part I, above.

C. Name, title, post office address, and telephone number of the persons to whom correspondence in regard to the application should be addressed.

Robin J. Lunt
Chief Commercial Officer
Guzman Energy LLC
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Max Carpenter
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Guzman Energy LLC
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¹ *Guzman Energy LLC* (authority originally granted to *Guzman Power Markets LLC* in FERC Docket Nos. ER13-1910 and ER13-1910-002; name change from *Guzman Power Markets LLC* to *Guzman Energy LLC* in 2014 filed in FERC Docket No. RM99-9).

D. State or territory under the laws of which the Applicant is organized or incorporated, or authorized to operate. If the Applicant is authorized to operate in more than one state, all pertinent facts should be included.

Applicant is a limited liability company organized under the laws of the State of Florida. It is currently authorized to operate in Florida, Colorado, Texas, California, New Mexico, Connecticut, Maryland, New Jersey, New York, Pennsylvania, Utah, Montana, and Wyoming.

E. Name and address of any known Federal, State or local government agency which may have any jurisdiction over the action to be taken in this application and a brief description of that authority.

Pursuant to Section 202(e) of the Federal Power Act, DOE is the sole agency with jurisdiction over the proposed export of electric energy from the United States to Mexico. No other Federal, State, or local government entity or agency has jurisdiction over the proposed exports described in this application.

F. Description of the transmission facilities through which the electric energy will be delivered to the foreign country including the name of the owners and the location of any remote facilities.

Applicant seeks blanket authorization to export electric energy to Mexico over any authorized international electric transmission facilities that are appropriate for open access transmission by third parties. A list of currently authorized transmission facilities is attached hereto in Exhibit C. Applicant's request for authorization under this application qualifies for a categorical exclusion under DOE's regulations implementing the National Environmental Policy Act of 1969, inasmuch as Applicant's request for export authority is limited to the use of transmission facilities for which a Presidential Permit has been issued.

G. Technical discussion of the proposed electricity export's reliability, fuel use and system stability impact on the Applicant's present and prospective electric power supply system. Applicant must explain why the proposed electricity export will not impair the sufficiency of electric supply on its

system and why the export will not impede or tend to impede the regional coordination of electric utility planning or operation.

Applicant seeks authority to transmit electric power to Mexico as a power marketer for a period of five (5) years, or for such other period as DOE deems appropriate, effective from the date of the order granting this application. In previous orders, DOE has endorsed a flexible approach for evaluating reliability issues associated with proposed export transactions. When considering applications from power marketers for export authorizations involving planned or existing international transmission facilities, DOE has relied on the technical analyses available for those facilities.² Applicant submits that it is appropriate for DOE to apply the same standard with respect to this request.

As noted above, Applicant does not have its own system on which its exports of energy could have an impact with respect to electric supply. As such, Applicant's proposed exports would not impair the sufficiency of the electric supply on "its system," as Applicant does not own or operate an integrated transmission or distribution system. The electric energy that Applicant would export on a firm or interruptible basis would be surplus energy purchased in wholesale markets in bilateral, voluntary transactions. Moreover, any such energy would be surplus to the needs of the relevant system, and exportation of the energy would not impair the adequacy of electric power supply within the United States by adversely impacting native load customers or other market participants.

Nor would the requested authorization impede or tend to impede regional coordination of electric utility planning or operation. Applicant's export transactions will be completed using the relevant procedures and/or market structures and coordinated with all relevant parties as required pursuant to the applicable market rules. Applicant further agrees to abide by the export limits

² See, e.g., *Global Pure Energy, LLC*, OE Docket No. EA-390 at p. 7 (Mar. 4, 2014).

contained in the relevant authorization of any transmission facility over which it exports energy to Mexico. Therefore, Applicant's export transactions will not compromise transmission system security or reliability.

H. Original application shall be signed and verified under oath by an officer of the Applicant having knowledge of the matters set forth herein.

The executed verification is attached to this Application.

III. EXHIBITS AND ATTACHMENTS PURSUANT TO 10 C.F.R. § 205.303

Pursuant to 10 C.F.R. § 205.303, the following exhibits are attached to this Application. To the extent that an exhibit is not applicable to this Application, Guzman Energy has designated the exhibits accordingly below.

A. A copy of the agreement or proposed agreement under which the electricity is to be transmitted including a listing of the terms and conditions.

Not applicable.

B. A showing, including a signed opinion of counsel, that the proposed export of electricity is within the corporate power of the applicant, and that the applicant has complied or will comply with all pertinent Federal and State laws.

Please see the signed opinion of counsel attached hereto as Exhibit B.

C. A general map showing the applicant's overall electric system and a detailed map highlighting the location of the facilities or the proposed facilities to be used for the generation and transmission of the electric energy to be exported.

A list of currently authorized transmission facilities is provided in lieu of a map, and is attached hereto as Exhibit C.

D. If an applicant resides or has its principal office outside the United States, such applicant shall designate, by irrevocable power of attorney, an agent residing within the United States.

Not applicable.

E. A statement of any corporate relationship or existing contract between the applicant and any other person, corporation, or foreign government, which in any way relates to the control or fixing of rates for the purchase, sale or transmission of electric energy.

Not applicable.

F. An explanation of the methodology (Operating Procedures) to inform neighboring electric utilities in the United States of the available capacity and energy which may be in excess of the applicant's requirements before delivery of such capacity to the foreign purchaser.

Not applicable.

IV. CONCLUSION

In consideration of the foregoing, Guzman Energy respectfully requests approval of this Application and renewed authorization to export electricity energy from the United States to Mexico for a term of five (5) years, with an effective date of December 7, 2023.

Respectfully submitted,

/s/


Robin J. Lunt

Chief Commercial Officer

On behalf of Guzman Energy LLC

Date: October 3, 2023

EXHIBIT B

LEGAL OPINION

The following opinion is given on October 3, 2023, in support of the foregoing application of Guzman Energy LLC for Renewal of Authorization to Transmit Electric Energy to Mexico.

1. I am an attorney at law, authorized to practice law in the District of Columbia and the State of Colorado.
2. I am counsel to Guzman Energy LLC, a duly organized and validly existing limited liability company, which is in good standing under the laws of the State of Florida.
3. Guzman Energy LLC has the corporate capacity to act in the manner described in the foregoing application.
4. To the best of my knowledge and belief, Guzman Energy LLC has complied with or is in the process of complying with all Federal and State laws regarding the matters contemplated in the application.

/s/

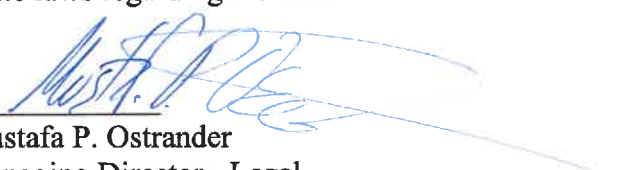

Mustafa P. Ostrander
Managing Director - Legal
Guzman Energy LLC
1125 17th Street, Suite 740
Denver, CO 80202

EXHIBIT C

TRANSMISSION SYSTEM INFORMATION

Present Owner	Location	Voltage	Presidential Permit³
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
Baja California Power, Inc.	Imperial Valley, CA	230 kV	PP-234
Generadora de Desierto WAPA	San Luiz, AZ	230 kV	PP-304
AEP Texas Inc.	Brownsville, TX	138 kV	PP-425
	Brownsville, TX	69 kV	PP-425
	Laredo, TX	138 kV	PP-423
	Laredo, TX	230 kV	PP-423
	Eagle Pass, TX	138 kV	PP-424
El Paso Electric Company	Diablo, NM	115 kV	PP-92
	Ascarate, TX	115 kV	PP-48
San Diego Gas & Electric	Miguel, CA	230 kV	PP-68
	Imperial Valley, CA	230 kV	PP-79
Sharyland Utilities	McAllen, TX	138 kV	PP-285
Nogales Transmission	Nogales, AZ	230 kV	PP-420

³ These Presidential Permit numbers refer to the generic DOE permit number and are intended to include any subsequent amendments to the permit authorizing the facility.

**UNITED STATES OF AMERICA
BEFORE THE DEPARTMENT OF ENERGY
GRID DEPLOYMENT OFFICE**

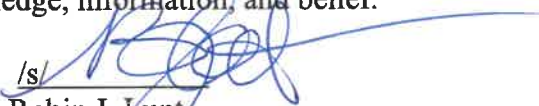
Guzman Energy LLC

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Docket No. EA-462-A

VERIFICATION

The undersigned, being duly sworn, states that she is an authorized representative of Guzman Energy LLC; that she has read the foregoing application of Guzman Energy LLC for renewal of authorization to transmit electricity to Mexico; and that all statements contained therein are true and correct to the best of her knowledge, information, and belief.

/s/ 
Robin J. Lunt
Chief Commercial Officer
Guzman Energy LLC

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document

STATE OF COLORADO

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COUNTY OF DENVER

Subscribed and sworn to (or affirmed) before me on the 3rd day of October, 2023
by Heather Muser, proved to me on the basis of satisfactory evidence
to be the person(s) who appeared before.

Name: Heather Muser
Notary Public in and for said State

(SEAL)

