

Gregory Arroyo, Jr.

Attorney at Law
124 Palm Blvd.
Missouri City, Texas 77459

April 30, 2024

Filed Electronically

Grid Deployment Office
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, DC 20585-0350
electricity.exports@hq.doe.gov

To Whom It May Concern:

Enclosed for filing is the Renewal Application of EDECSAMEX, S.A. de C.V. for Authorization to Transmit Electric Energy to Mexico (the "Application"). The filing fee of \$500 has been paid via PAY.GOV (Pay.gov Tracking ID: 27DRB7E8 and Agency Tracking ID: 76700599553).

Should you have any questions regarding the Application, please see below or in Section III therein for the contact information of myself and Vahid Sadeghpour, who is the authorized legal representative of the applicant.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Gregory Arroyo, Jr.', with a stylized, cursive script.

Gregory Arroyo, Jr.
Counsel for EDECSAMEX, S.A. de C.V.
garroyo@grupoedecsa.com
(713) 907-5505

**UNITED STATES OF AMERICA
BEFORE THE
DEPARTMENT OF ENERGY
OFFICE OF ELECTRICITY**

EDECSAMEX, S.A. de C.V.

Docket No. EA-470-A

**RENEWAL APPLICATION OF EDECSAMEX, S.A. de C.V.
FOR AUTHORIZATION TO TRANSMIT ELECTRIC ENERGY TO MEXICO**

Pursuant to Section 202(e) of the Federal Power Act (16 U.S.C. § 824a(e)), and regulations thereunder (10 C.F.R. §§ 205.300, *et seq.*), EDECSAMEX, S.A. de C.V. (“EDECSAMEX”) hereby submits this renewal application (the “Application”) for blanket authorization from the Department of Energy (“DOE” or the “Department”) to transmit electric energy from the United States to Mexico for a term of five years, or the maximum allowed by the Department. In support of its Application, EDECSAMEX respectfully shows as follows:

I. BACKGROUND

On July 18, 2019, the Department issued Order No. EA-470 authorizing EDECSAMEX to export electricity from the United States to Mexico as a power marketer for a five year term. EDECSAMEX hereby requests that the Department renew such export authorization for a term of five years, or the maximum allowed by the Department, with an effective date of July 18, 2024.

In accordance with Order No. EA-470, EDECSAMEX files this Application more than sixty (60) days prior to the expiration of its current authorization. The export of electric energy to Mexico by EDECSAMEX does not and will not impair the sufficiency of electric supply within the United States. Moreover, such exports do not and will not impede or tend to impede the coordination in the public interest of facilities subject to the jurisdiction of the Federal Energy Regulatory Commission (“FERC”).

II. DESCRIPTION OF THE APPLICANT

The exact legal name of the applicant is EDECSAMEX, Sociedad Anónima de Capital Variable (also known as EDECSAMEX, S.A. de C.V.). EDECSAMEX was incorporated under the laws of Mexico as a Sociedad Anónima de Capital Variable with its principal place of business in Mexico City, Mexico. EDECSAMEX is owned by Vahid Sadeghpour, a U.S. citizen, with one share (0.002%) and by Energía, Desarrollo y Consultoría, S.A. de C.V., a company incorporated in El Salvador, with 49,999 shares (99.998%).

EDECSAMEX is authorized by the Centro Nacional de Control de Energía (“CENACE”), Mexico’s national grid operator, to transact as a wholesale power marketer throughout Mexico. EDECSAMEX is also authorized by CENACE to import and export electricity with the United States. As a result of its authority granted by CENACE, EDECSAMEX has been actively participating as a power marketer within Mexico and currently imports electric energy into Mexico from Guatemala, as well as exporting electric energy from Mexico into the United States, Guatemala and may export into Belize in the future.

Moreover, EDECSAMEX has purchased excess electricity on the regional markets of the Electric Reliability Council of Texas (“ERCOT”) and the California Independent System Operator (“CAISO”) and exported such excess electricity into Mexico. It has also traded excess electricity with its affiliate, EDC Power, LLC.

The energy that EDECSAMEX has exported and proposes to export to Mexico was and will be purchased as excess energy from its affiliate or from third parties, such as electric utilities and federal power marketing agencies, pursuant to voluntary agreements, and wheeled over existing transmission facilities owned by third parties. Thus, the exported energy has been and will be surplus to the needs of the selling entities and the overall electrical system and has not and will not impact the reliability of the transmission grid.

II. PARTNERS

EDECSAMEX is not seeking authorization to export power on behalf of, or in conjunction with, any partners.

III. COMMUNICATIONS

Communications regarding this Application should be addressed to the following persons:

Vahid Sadeghpour
Sole Administrator, EDECSAMEX, S.A. de C.V.
2615 Centenary Street
Houston, Texas 77005
(713) 851-0473
vsadeghpour@grupoedecsa.com

Gregory Arroyo, Jr.
Counsel for EDECSAMEX, S.A. de C.V.
124 Palm Blvd.
Missouri City, Texas 77459
(713) 907-5505
garroyo@grupoedecsa.com

IV. JURISDICTION

Under Section 202(e) of the FPA (16 U.S.C. § 824a(e)), and the Department's regulations, 10 C.F.R. §§ 205.300, *et seq.*, persons seeking to transmit electric energy from the United States to a foreign country must secure an order from the Department authorizing the export. EDECSA does not know of any other

federal, state or local government other than DOE that has jurisdiction over the actions to be taken under the authority set out in this Application.

V. TECHNICAL DISCUSSION OF PROPOSAL

EDECSAMEX respectfully seeks authority to continue transmitting electric energy across international transmission facilities into Mexico as a power marketer for a term of five years or the maximum allowed by the Department. Neither EDECSAMEX, nor any of its owners, own or control (nor hold an interest in other entities that own or control) any electric power generation or transmission facilities within the United States. Additionally, neither EDECSAMEX nor any of its owners hold a franchised electric power service area nor have a native load obligation.

EDECSAMEX intends to continue exporting electricity under terms and conditions to be negotiated in the future over existing interconnections between the United States and Mexico. Exhibit C to the Application provides the present owner, location, voltage, and presidential permit number of the transmission facilities that are currently in operation.

The commercial plan of EDECSAMEX has been to source excess power supply from the ERCOT market and sell such supply into the Mexican market. EDECSAMEX has also sourced excess electric energy from the CAISO market for sale into the Mexican market. In addition to ERCOT and CAISO, it may also source excess electricity from other markets bordering with Mexico and thus seeks renewal of its blanket authorization. As the electric power that EDECSAMEX has exported and plans to export to Mexico has been and will be excess supply, its commercial plan has not impacted and will not impact native load requirements. Moreover, as the electric power it has exported and plans to export has been and will be wheeled over transmission facilities owned and operated by third parties, it has not affected and will not affect reliability of the ERCOT or CAISO transmission networks, or other networks if and when it expands its commercial plan into other markets. Therefore, the export of electric energy to Mexico by EDECSAMEX has not impacted and will not impact the sufficiency of electric supply nor the reliability of the transmission grid.

All other commercial arrangements and required regulatory approvals to support the export of excess power from ERCOT, CAISO or any other regional entity are in place and will be renewed as appropriate. These include but are not limited to the following: (i) each transaction initiated by EDECSAMEX has been and will be scheduled with the appropriate balancing authority, such as ERCOT or CAISO, in compliance with the applicable reliability standards and guidelines of the North American Electric Reliability Corporation (“NERC”) and the applicable regional operators; (ii) all necessary approvals to transmit the exported energy over existing transmission facilities and international interconnections have been obtained and will be maintained, including compliance with the procedures as may be required by the owners of such

transmission facilities; (iii) each transaction has complied and will continue to comply with the export limits as set by the Department from time to time; and (iv) all reporting requirements of the Department have been and will continue to be met.

VI. PROCEDURES

As in its prior DOE order granting export authorization, EDECSAMEX respectfully requests that the reliability analysis and sufficiency of supply findings of such orders be applied for its Application. EDECSAMEX agrees to comply with the terms and conditions for cross-border facilities as well as any other export limitations the Department deems appropriate. EDECSAMEX will: (i) obtain all necessary permissions for transmission access over the facilities listed in Exhibit C; (ii) comply with all reliability criteria, standards, and guidelines of NERC, ERCOT and other applicable regional entities; (iii) comply with all reporting requirements, including those of the DOE, ERCOT, and/or other applicable entities, such as compliance with 10 C.F.R. § 205.308; and (iv) comply with any export limits established for the transmission facilities authorized by any permit granted by the Department, or otherwise ensure the terms and conditions set forth in the export authorization permit are not violated.

VII. VERIFICATION, REQUIRED COPIES AND FEE

The verification executed by the authorized representative of EDECSAMEX in accordance with 10 C.F.R. § 205.302(h) is enclosed with the Application. This Application is being filed electronically as per the instructions on the Department's website. The filing fee of \$500.00 has been made via PAY.GOV (Pay.gov Tracking ID: 27DRB7E8 and Agency Tracking ID: 76700599553).

VIII. LIST OF EXHIBITS

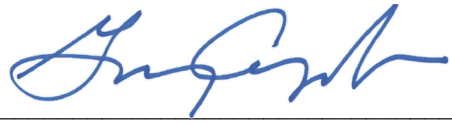
In accordance with the requirements of 10 C.F.R. § 205.303, the following exhibits are attached hereto:

- Exhibit A: Transmission Agreements
- Exhibit B: Opinion of Counsel
- Exhibit C: International Transmission Facilities (submitted in lieu of maps)
- Exhibit D: Irrevocable Power of Attorney
- Exhibit E: Statement of Corporate Relationships or Existing Contracts

Exhibit F: Operating Procedures

IX. CONCLUSION

WHEREFORE, EDECSAMEX, S.A. de C.V. respectfully requests that this Renewal Application for Authorization to Transmit Electric Energy to Mexico be considered and approved.

By: _____

Gregory Arroyo, Jr.

Counsel for EDECSAMEX, S.A. de C.V.

Texas Bar Number 01358700

**RENEWAL APPLICATION OF EDECSAMEX S.A. de C.V.
FOR AUTHORIZATION TO TRANSMIT ELECTRIC ENERGY TO MEXICO**

VERIFICATION

STATE OF TEXAS

§

§

COUNTY OF HARRIS

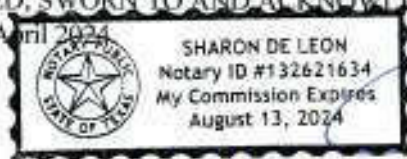
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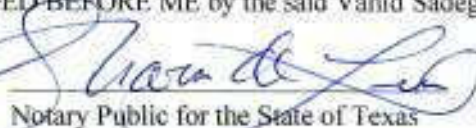
I, Vahid Sadeghpour, Sole Administrator of EDECSAMEX, S.A. de C.V., am authorized to provide this verification on behalf of EDECSAMEX, S.A. de C.V. and have knowledge of the matters set forth in the foregoing Renewal Application of EDECSAMEX, S.A. de C.V. for Authorization to Transmit Electric Energy to Mexico. I hereby verify that the contents thereof are true and correct to the best of my knowledge, information and belief.

By:


Vahid Sadeghpour
Sole Administrator

SUBSCRIBED, SWORN TO AND ACKNOWLEDGED BEFORE ME by the said Vahid Sadeghpour, this
30 day of April 2024




Notary Public for the State of Texas

My Commission Expires: August 13, 2024

**RENEWAL APPLICATION OF EDECSAMEX S.A. de C.V.
FOR AUTHORIZATION TO TRANSMIT ELECTRIC ENERGY TO MEXICO**

**EXHIBIT A
TRANSMISSION AGREEMENTS**

EDECSAMEX certifies that it holds no transmission reservations or transmission agreements within the United States.

**RENEWAL APPLICATION OF EDECSAMEX S.A. de C.V.
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**EXHIBIT B
OPINION OF LEGAL COUNSEL**

Pursuant to 10 C.F.R. § 205.303(b), this opinion is rendered regarding the Renewal Application of EDECSAMEX, S.A. de C.V. (“EDECSAMEX”) for the Authorization to Transmit Electric Energy to Mexico to which this Exhibit B is incorporated by reference (the “Application”).

After reviewing the underlying support for the Application, the relevant corporate documents of EDECSAMEX and the pertinent Federal and State laws, it is my opinion that:

- 1. The proposed export of electricity is within the corporate power of EDECSAMEX, and**
- 2. EDECSAMEX has complied, and will comply, with all pertinent Federal laws of the United States and all the pertinent State laws.**

This opinion is rendered as of the date of the Application, and I assume no obligation to update this opinion. This opinion is rendered solely for the purposes of the Application and is not to be used, made available or relied upon for any other purpose or by anyone other than the reviewing entity, unless expressly permitted in writing by me.

By: 
Gregory Arroyo, Jr.
Counsel for EDECSAMEX, S.A. de C.V.
Texas Bar Number 01358700

**RENEWAL APPLICATION OF EDECSAMEX S.A. de C.V.
FOR AUTHORIZATION TO TRANSMIT ELECTRIC ENERGY TO MEXICO**

**EXHIBIT C
INTERNATIONAL TRANSMISSION FACILITIES
(SUBMITTED IN LIEU OF MAPS)**

A list of the existing and permitted international transmission facilities at the border between the United States and Mexico available for open access transmission is listed below:

Present Owner	Location	Voltage	Presidential Permit No.
Comisión 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 del 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-68-2
	Imperial Valley, CA	230 kV	PP-79
Sharyland Utilities	McAllen, TX	138 kV	PP-285
Nogales Transmission	Nogales, AZ	230 kV	PP-420

**RENEWAL APPLICATION OF EDECSAMEX S.A. de C.V.
FOR AUTHORIZATION TO TRANSMIT ELECTRIC ENERGY TO MEXICO**

**EXHIBIT D
IRREVOCABLE POWER OF ATTORNEY**

This IRREVOCABLE POWER OF ATTORNEY is made this 30 day of April 2024 by EDECSAMEX, S.A. de C.V., (the "Principal"), a Sociedad Anónima de Capital Variable incorporated under the laws of Mexico, with its corporate office in Mexico City, Mexico.

1. **Appointment.** The Principal appoints Rebecca Elizabeth Ramirez, who may be served process at 2615 Centenary Street, Houston, Texas 77005, as its true and lawful agent ("Agent") for the limited purpose set forth herein.
2. **Scope of Authority.** The Agent shall have the limited power of attorney and authority to receive service of process for any and all matters relating to the Principal's standing before the Department of Energy and its Office of Electricity regarding the Principal's export permit to transmit electric energy to Mexico.
3. **Irrevocability.** This Power of Attorney is irrevocable by the Principal for the entire term of the export permit issued allowing it to transmit electric energy to Mexico.

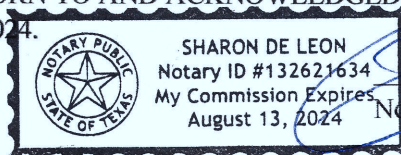
IN WITNESS WHEREOF, the Principal has caused this Power of Attorney to be duly executed on the first date set forth above.

EDECSAMEX, S.A. de C.V.

By: _____

Vahid Sadeghpour
Sole Administrator

SUBSCRIBED, SWORN TO AND ACKNOWLEDGED BEFORE ME by the said Vahid Sadeghpour, this 30 day of April 2024.



Notary Public for the State of Texas

My Commission Expires: August 13, 2024

**RENEWAL APPLICATION OF EDECSAMEX S.A. de C.V.
FOR AUTHORIZATION TO TRANSMIT ELECTRIC ENERGY TO MEXICO**

EXHIBIT E
STATEMENT OF CORPORATE RELATIONSHIPS OR EXISTING CONTRACTS

Not applicable.

**RENEWAL APPLICATION OF EDECSAMEX S.A. de C.V.
FOR AUTHORIZATION TO TRANSMIT ELECTRIC ENERGY TO MEXICO**

**EXHIBIT F
OPERATING PROCEDURES**

Not applicable.