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June 30, 2025

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

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

Re: Vitol Inc.
Application for Renewal of Authorization to Transmit Electric Energy to Canada
Docket No. EA-370-C

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 Vitol Inc. (“Vitol”) for Renewal of Authorization to Transmit Electric Energy to Canada (the “Application”). As discussed in the Application, Vitol respectfully requests that DOE renew its existing blanket authorization to transmit electric energy from the United States to Canada for a term of five (5) years, with an effective date of December 14, 2025, which is the day after Vitol’s currently effective authorization expires.

Vitol has electronically submitted the \$500.00 Application filing fee through the DOE General Collections Form on Pay.gov (Tracking ID: 27P9SLO5).

Respectfully submitted,

/s/

Casey Khan
Keturah A. Brown

Counsel for Vitol Inc.

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

Vitol Inc.

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Docket No. EA-370-C

**APPLICATION OF VITOL INC.
FOR RENEWAL OF AUTHORIZATION TO
TRANSMIT ELECTRIC ENERGY TO CANADA**

Vitol Inc. (“Vitol” or “Applicant”) respectfully requests that the Grid Deployment Office of the United States Department of Energy (“DOE”) renew Vitol’s blanket authorization to transmit electric energy from the United States to Canada for an additional term of five (5) years, with an effective date of December 14, 2025, which is the day after Applicant’s currently effective authorization expires. Vitol 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.*

Vitol is currently authorized to export electricity to Canada 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 November 12, 2020 in Order No. EA-370-B (“Export Order”). Vitol is authorized to export electricity to Canada 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, Vitol’s current electricity export authorization will expire on December 13, 2025. Therefore, Vitol respectfully requests action on this Application and renewed export authorization on or before December 13, 2025, with an effective date of December 14, 2025.

I. DESCRIPTION OF APPLICANT

Applicant is a wholly owned direct subsidiary of Vitol US Holding Co, an intermediate holding company incorporated in Delaware and a direct, wholly-owned subsidiary of Euromin Inc., a Delaware corporation. Euromin Inc. is a wholly-owned subsidiary of Vitol Holding B.V. Vitol Holding B.V. is a privately held Dutch company, and is one of the largest independent oil distributors in the world. 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 Vitol is a power marketer and dealer of other energy products. 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.

Vitol Inc.

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.

Averill H. Conn
Vitol Inc.
2925 Richmond Ave Ste 1100
Houston, TX 77098-3133
(713) 230-1049
acn@vitol.com

Casey Khan
Keturah A. Brown
1000 Louisiana St., Suite 5900
Houston, TX 77002
(713) 495-4545
ckhan@sidley.com
keturah.brown@sidley.com

¹ *Vitol Inc.*, FERC Docket No. ER22-2505-000 (Sep. 13, 2022) (unpublished letter order).

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.

Vitol is a Delaware corporation with its principal place of business in Houston, Texas. Vitol is authorized to operate in Alabama, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, Florida, Georgia, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, South Dakota, Tennessee, Texas, United States Virgin Islands, Utah, Vermont, Virginia, Washington, West Virginia, Wisconsin 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 FPA, DOE is the sole agency with jurisdiction over the proposed export of electric energy from the United States to Canada. 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 Canada 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 Canada 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.

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

Similarly, the requested authorization would not 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 contained in the relevant authorization of any transmission facility over which it exports energy to Canada. 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, Vitol 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, Vitol respectfully requests approval of this Application and renewed authorization to export electricity energy from the United States to Canada for a term of five (5) years, with an effective date of December 14, 2025.

Respectfully submitted,

/s/

Casey Khan
Keturah A. Brown

Counsel for Vitol Inc.

EXHIBIT B
LEGAL OPINION



Vitol Inc.

2925 Richmond Avenue
11th Floor
Houston, TX 77098
United States of America
Tel (1 713) 230 1000
Fax (1 713) 230 1111

June 18, 2025

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

Re: Vitol Inc.
Application for Renewal of Authorization to Transmit Electric Energy to
Canada
Docket No. EA-370-C

To the U.S. Department of Energy, Grid Deployment Office:

The following opinion is given in support of the foregoing application of Vitol Inc. for Renewal of Authorization to Transmit Electric Energy to Canada.

1. I am an attorney at law, authorized to practice law in the State of Texas.
2. I am counsel to Vitol Inc., a duly incorporated and validly existing corporation, which is in good standing under the laws of the State of Delaware.
3. Vitol Inc. has the corporate capacity to act in the manner described in the application.
4. To the best of my knowledge and belief, Vitol Inc. has complied with or is the process of complying with all Federal and State laws regarding the matters contemplated in the application.

A handwritten signature in black ink, reading "Averill H. Conn". The signature is fluid and cursive, with the first name "Averill" and last name "Conn" clearly legible.

Averill H. Conn
Associate General Counsel
Vitol Inc.

EXHIBIT C

TRANSMISSION SYSTEM INFORMATION

Present Owner	Location	Voltage	Presidential Permit No.
Bangor Hydro Electric Co.	Baileyville, ME	345 kV	PP-89
Basin Electric Power Cooperative	Tioga, ND	230 kV	PP-64
Bonneville Power Administration	Blaine, WA	2x 500 kV	PP-10
	Nelway, WA	230 kV	PP-36
	Nelway, WA	230 kV	PP-46
Eastern Maine Electric Cooperative	Calais, ME	69 kV	PP-32
International Transmission Co.	Detroit, MI	230 kV	PP-230
	Marysville, MI	230 kV	PP-230
	St. Claire, MI	230 kV	PP-230
	St. Claire, MI	345 kV	PP-230
ITC Lake Erie Connector	Erie County, PA	320 kV	PP-412**
Joint Owners of the Highgate Project	Highgate, VT	120 kV	PP-82
Long Sault, Inc.	Massena, NY	2x 115 kV	PP-24
Maine Electric Power Co.	Houlton, ME	345 kV	PP-43
Maine Public Service Co.	Limestone, ME	69 kV	PP-12
	Fort Fairfield, ME	69 kV	PP-12
	Madawaska, ME	138 kV	PP-29
	Aroostock, ME	2x 69 kV	PP-29
Minnesota Power Inc.	International Falls, MN	115 kV	PP-78
Minnesota Power Inc.	Roseau County, MN	500 kV	PP-398**
Minnkota Power Cooperative	Roseau County, MN	230 kV	PP-61
Montana Alberta Tie Ltd.	Cut Bank, MT	230 kV	PP-305
New York Power Authority	Massena, NY	765 kV	PP-56
	Massena, NY	2x 230 kV	PP-25
	Niagara Falls, NY	2x 345 kV	PP-74
	Devil's Hole, NY	230 kV	PP-30
Niagara Mohawk Power Corp.	Devil's Hole, NY	230 kV	PP-190
Northern States Power Co.	Red River, ND	230 kV	PP-45
	Roseau County, MN	500 kV	PP-63

Present Owner	Location	Voltage	Presidential Permit No.
	Rugby, ND	230 kV	PP-231
Sea Breeze Olympic Converter LP	Port Angeles, WA	±450 kV DC	PP-299**
Vermont Electric Power Co.	Derby Line, VT	120 kV	PP-66
Vermont Electric Transmission Co.	Norton, VT	±450 kV DC	PP-76

**These transmission facilities have been authorized but not yet constructed or placed into service.

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

Vitol Inc.

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Docket No. EA-407-C

VERIFICATION

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

/s/ 

Richard J. Evans
Senior Vice President and CFO
Vitol Inc.

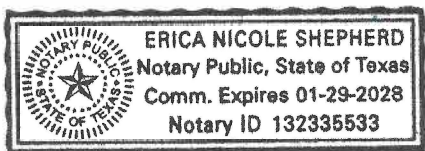
A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document

STATE OF TEXAS

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COUNTY OF HARRIS

Subscribed and sworn to (or affirmed) before me on the 30th day of June, 2025 by Richard J. Evans, proved to me on the basis of satisfactory evidence to be the person(s) who appeared before.





Name: Erica Nicole Shepherd
Notary Public in and for said State