



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

**Vitol Inc.**

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**Docket No. EA-407-B**

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

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 Mexico for an additional term of five (5) years, with an effective date of November 13, 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 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 November 12, 2020 in Order No. EA-407-A (“Export Order”). Vitol 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, Vitol’s current electricity export authorization will expire on November 12, 2025. Therefore, Vitol respectfully requests action on this Application and renewed export authorization on or before November 12, 2025, with an effective date of November 13, 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”).<sup>1</sup> 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](mailto:acn@vitol.com)

Casey Khan  
Keturah A. Brown  
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Houston, TX 77002  
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[ckhan@sidley.com](mailto:ckhan@sidley.com)  
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<sup>1</sup> *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 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.<sup>2</sup> 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.

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

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 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, 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 Mexico for a term of five (5) years, with an effective date of November 15, 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 25, 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 Mexico**  
**Docket No. EA-407-B**

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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 Mexico.

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 that reads "Averill H. Conn".

Averill H. Conn  
Associate General Counsel  
Vitol Inc.

## EXHIBIT C

### TRANSMISSION SYSTEM INFORMATION

Present Owner	Location	Voltage	Presidential Permit <sup>3</sup>
AEP Texas Inc.	Brownsville, TX	138 kV	PP-425
		69 kV	PP-425
	Laredo, TX	138 kV	PP-423
		230 kV	PP-423
	Eagle Pass, TX	138 kV	PP-424
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 <sup>4</sup>
	Redford, TX	7.2 kV	PP-51
	Presidio, TX	13.8 kV	PP-03
Energia Sierra Juarez U.S. Transmission, LLC	Jacumba, CA	2-230 kV	PP-334 PP-334-1
El Paso Electric Company	Diablo, NM	115 kV	PP-92
	Ascarate, TX	115 kV	PP-48
Generadora de Desierto WAPA	San Luiz, AZ	2-230 kV	PP-304*
Nogales Transmission	Nogales, AZ	230 kV	PP-420*
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

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

<sup>3</sup> 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.

<sup>4</sup> The international transmission facilities consisting of a 138 kV line at Falcon Dam in Falcon Heights, Texas, were authorized by the treaty between the United States and Mexico titled, "Utilization of Waters of Colorado and Tijuana Rivers and of the Rio Grande," signed February 3, 1944, and offer open transmission access.

UNITED STATES OF AMERICA  
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VERIFICATION

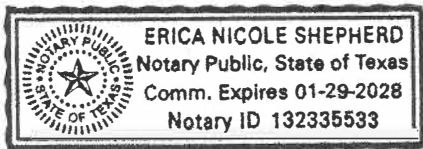
The undersigned, being duly sworn, states that she is an authorized representative of Vitol Inc.; that he has read the foregoing application of Vitol Inc. for authorization to transmit electricity to Mexico; and that all statements contained therein are true and correct to the best of her knowledge,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