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June 26, 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: CFE International LLC**  
**Application for Renewal of Authorization to Transmit Electric Energy to Mexico**  
**Docket No. EA-484-A**

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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 CFE International LLC (“CFEi”) for Renewal of Authorization to Transmit Electric Energy to Mexico (the “Application”). As discussed in the Application, CFEi 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 August 29, 2025, which is the day after CFEi’s currently effective authorization expires.

CFEi has electronically submitted the \$500.00 Application filing fee through the DOE General Collections Form on Pay.gov (Tracking ID: 27P78MFG).

Respectfully submitted,

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Sarah Tucker  
Keturah A. Brown

*Counsel for CFE International LLC*

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

**CFE International LLC**

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**Docket No. EA-484-A**

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

CFE International LLC (“CFEi” or “Applicant”) respectfully requests that the Grid Deployment Office of the United States Department of Energy (“DOE”) renew CFEi’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 August 29, 2025, which is the day after Applicant’s currently effective authorization expires. CFEi 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.*

CFEi 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 August 28, 2020 in Order No. EA-484 (“Export Order”). CFEi 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, CFEi’s current electricity export authorization will expire on August 28, 2025. Therefore, CFEi respectfully requests action on this Application and renewed export authorization on or before August 28, 2025, with an effective date of August 29, 2025.

## **I. DESCRIPTION OF APPLICANT**

Applicant is a Delaware limited liability company with its principal place of business in Houston, Texas. Applicant was formed for the purpose of engaging in the trading, purchase, sale, import, export, transportation and storage of natural gas, carbon and other fuels or commodities, including electricity, in the United States.

CFEi is a wholly-owned, direct subsidiary of the Comisión Federal de Electricidad (“CFE”), which is itself wholly owned by the Mexican Federal Government and provides the public service of transmission and distribution of electricity in Mexico. Additionally, CFE performs the generation and sale of electricity and related products, as well as import, export, transport, storage, purchase and sale of natural gas, coal and any other fuel, the development and execution of engineering products, geological and geophysical activities, research, development and implementation of energy sources. CFE currently serves approximately more than 47 million customers in Mexico, including residential, commercial, industrial and agricultural customers, and state and central agencies.

Applicant has received authorization from the Federal Energy Regulatory Commission (“FERC”) to sell energy, capacity, and certain ancillary services at wholesale market-based rates as a Category 1 Seller in the Northeast, Northwest, Southeast, Central and Southwest Power Pool regions and as a Category 2 Seller in the Southwest region pursuant to Part 35, Subpart H of FERC’s regulations.<sup>1</sup>

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

### **A. Exact legal name of Applicant.**

CFE International LLC

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<sup>1</sup> See *CFE International LLC*, Docket No. ER18-1778-000, 164 FERC ¶ 61,187, at PP 1-2 (Sep. 17, 2018).

**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 person to whom correspondence in regard to the application should be addressed.**

Juan Esteban Corro Jalpa  
Vice President of Compliance  
CFE International LLC  
825 Town & Country Ln  
Houston, TX 77024  
(832) 763-2147  
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**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.**

CFEi is a Delaware limited liability company with its principal place of business in Houston, Texas. CFEi is authorized to operate in Texas.

**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.

Applicant does not directly or indirectly own, operate or control any electric generation facilities, electric transmission facilities, distribution facilities, or inputs to electric power production, including intrastate natural gas storage or distribution facilities, physical coal supply sources, or ownership of or control over who may access transportation of coal supplies, nor is Applicant affiliated with an utility that has a franchised service territory in the United States. Applicant holds firm and interruptible transportation capacity on various interstate and intrastate

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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).

natural gas facilities. Applicant has acquired this capacity through such facilities' tariffs or through a competitive, open season process.

CFE, which wholly owns Applicant, does not directly or indirectly own or control any generation or transmission facilities in the United States, or engage in wholesale sales of electric energy, or any other FERC jurisdictional transactions in the United States. In addition, CFE does not directly or indirectly own or control a franchised utility in the United States, including intrastate gas transportation, intrastate natural gas storage or distribution facilities, physical coal supply sources, or ownership of or control over who may access transportation of coal supplies. CFE owns generation, transmission, and distribution facilities within Mexico, and is engaged in both the generation of power and in the transmission, distribution, and sale of such power to wholesale and retail customers within Mexico. CFE owns and controls through long-term contracts a total installed capacity of approximately 71.1 GW. CFE's generation, transmission and distribution facilities are located entirely within Mexico.

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 will 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 would be surplus energy purchased in wholesale markets, on a firm or interruptible basis, in bilateral, voluntary transactions, and may include purchases from electric utilities, federal power marketing agencies, qualifying cogeneration, small power production facilities and exempt wholesale generators (as those terms are defined in the FPA), independent system operators, regional transmission organizations, and other public utilities. Moreover, any such energy would be surplus to the needs of the relevant system, and the proposed exports accordingly will not impair

the adequacy of electric power supply within the United States by adversely impacting native load customers or other market participants. Additionally, as a power marketer that does not own or operate a transmission system, Applicant does not have the ability to cause a violation of the terms and conditions in the existing authorizations associated with the international transmission facilities identified in Exhibit C. While CFE holds Presidential Permits and ownership of certain international transmission lines identified in Exhibit C, Applicant is structurally separate from CFE. Any transactions between CFE and Applicant must be based upon proper transfer pricing principles and be conducted at arm's length. Applicant does not have the ability to cause total exports on Presidential Permit facilities to exceed the authorized instantaneous transmission rate.

The requested authorization will not impede or tend to impede regional coordination of electric utility planning or operation. Applicant will make all necessary commercial arrangements and will obtain any and all other regulatory approval required in order to carry out any power exports. This will include: (1) scheduling each transaction with the appropriate balancing authority area in compliance with all reliability criteria, standards, and guidelines of the North American Electric Reliability Corporation and the relevant Regional Entities (collectively, "NERC") in effect at the time of export; and (2) obtaining all necessary transmission access over approved export facilities. Applicant agrees to abide by the export limits contained in the relevant export authorization of any transmission facilities over which Applicant exports electric power to Mexico, and with such terms and conditions as may be established by DOE in respect of Applicant's authority to export electric energy to Mexico, including making periodic reports to DOE regarding exports, as may be applicable or required. The controls that are inherent in any transaction that complies with all NERC requirements and the export limits imposed by DOE on the international transmission facilities and on Applicant are sufficient to ensure that exports by Applicant will not

impede or tend to impede the coordinated use of transmission facilities within the meaning of FPA Section 202(e).

**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, CFEi 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, CFEi 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 August 29, 2025.

Respectfully submitted,



\_\_\_\_\_  
Sarah Tucker  
Keturah A. Brown

*Counsel for CFE International LLC*

**EXHIBIT B**  
LEGAL OPINION

# SIDLEY

June 26, 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: CFE International LLC - Application for Renewal of Authorization to Export Electricity from the United States to Mexico

Dear Sir or Madam:

This opinion is submitted to the Department of Energy (the “Department”) pursuant to 10 C.F.R. § 205.303(b), in connection with the application of CFE International LLC (the “Company”) for renewal of authorization to export electricity from the United States to Mexico (the “Application”). We are counsel to the Company, a limited liability company organized under the laws of the State of Delaware.

We have examined the Certificate of Formation, the Limited Liability Company Agreement, the Application and such other written statements of representatives of the Company as we have considered necessary as a basis for this letter. We have assumed the authenticity of all documents submitted to us as originals, the genuineness of all signatures, the legal capacity of all persons and the conformity with the original documents of any copies thereof submitted to us for examination. As to facts relevant to the opinions expressed herein, we have relied without independent investigation or verification upon, and assumed the accuracy and completeness of, any written statements and representations of public officials and representatives of the Company.

Based upon the foregoing, we are of the opinion that:

(1) the proposed export of electricity described in the Application is within the limited liability powers of the Company; and

(2) the Application complies with Section 202(e) of the Federal Power Act and, assuming the approval of the Application by the Department, all other laws of any federal regulatory body, federal administrative agency or other federal governmental authority of the United States of America which in our experience are pertinent to the making of the Application and the cross-border export of electric power to Mexico; and

(3) the Company has directed its officers to, and nothing has come to our attention that would lead us to conclude that the Company will not, comply with the laws of the states of Arizona, California, New Mexico and Texas (being the states that are pertinent to the Application) pertinent

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to the cross-border export of electric power to Mexico. We are not, however, licensed in all of those jurisdictions and such confirmation is subject to the qualifications herein.

As used herein, the statement “nothing has come to our attention” means that the lawyers currently practicing law with Sidley Austin LLP who have had an active involvement in the preparation of the Application and this opinion have no current conscious awareness of any facts or information contrary to the applicable statement. With respect to such matters, such persons, with your express permission and consent, have not undertaken any legal research or investigation or inquiry of other lawyers practicing law with this firm, or any review of files maintained by this firm, or any inquiry of officers or employees of the Company or of any other person. The reference to “conscious awareness” in this paragraph has the meaning given that phrase in the Third-Party Legal Opinion Report, Including the Legal Opinion Accord, of the Section of Business Law, American Bar Association, 47 Bus. Law. 167, 192 (1991).

Our opinions are premised upon there not being any facts or circumstances relevant to the opinions set forth herein not disclosed in the statements of public officials and certificates of appropriate representatives of the Company upon which we have relied, as noted above. The opinions expressed herein are expressed as of the date hereof, and we assume no obligation to advise you of changes in law, fact or other circumstances (or the effect thereof on the opinions expressed herein) that may come to our attention after such time.

Respectfully submitted,

A handwritten signature in blue ink that reads "Sidley Austin". The signature is written in a cursive, flowing style. Below the signature is a solid horizontal line.

Sidley Austin LLP

*Counsel for CFE International LLC*

## 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  
BEFORE THE DEPARTMENT OF ENERGY  
GRID DEPLOYMENT OFFICE**

CFE International LLC

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**Docket No. EA-484-A**

**VERIFICATION**

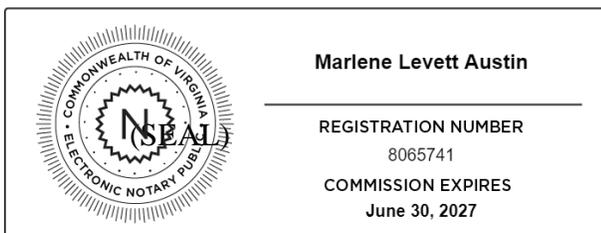
The undersigned, being duly sworn, states that he is an authorized representative of CFE International LLC; that he has read the foregoing application of CFE International LLC for authorization to transmit electricity to Mexico; and that all statements contained therein are true and correct to the best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

/s/ Juan Esteban Corro Jalpa  
Juan Esteban Corro Jalpa  
VP of Compliance  
CFE International 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

MLA Virginia  
STATE OF ~~TEXAS~~ )  
)  
COUNTY OF ~~HARRIS~~ Chesterfield )

Subscribed and sworn to (or affirmed) before me on the 26th day of June, 2025  
by Juan Esteban Corro Jalpa, proved to me on the basis of satisfactory evidence to be the person(s) who appeared before.



Marlene Levett Austin  
Name: Marlene Levett Austin  
Notary Public in and for said State Virginia