

**UNITED STATES OF AMERICA  
BEFORE THE  
DEPARTMENT OF ENERGY  
OFFICE OF ELECTRICITY DELIVERY & ENERGY RELIABILITY**

**Mercuria Energy America, LLC) Docket No. EA- 487-A**

**APPLICATION OF MERCURIA ENERGY AMERICA, LLC FOR  
AUTHORIZATION TO TRANSMIT ELECTRIC ENERGY INTO CANADA**

Pursuant to section 202(a)(e) of the Federal Power Act (the “FPA”), 16 U.S.C., § 824a(e) and 10 C.F.R. §§ 205.300 *et seq*, Mercuria Energy America, LLC (MEA or “Applicant”) hereby submits this “Application”) for authorization to export wholesale electricity from the United States to Canada for a five (5) year term. MEA respectfully requests expedited review of this Application and issuance of an order approving the Application within sixty (60) days. In support of this Application, MEA states as follows:

**DESCRIPTION OF APPLICANT**

The exact legal name of the Applicant is Mercuria Energy America, LLC a Delaware limited liability company, which is an energy marketing and trading company, authorized by the Federal Energy Regulatory Commission (FERC) to make wholesale sales of electricity at market based rates, with its principal place of business at 20 E. Greenway Plaza, Suite 650, Houston, Texas 77046. MEA is a direct, wholly-owned subsidiary of Mercuria Energy Company, LLC (MEC), a Delaware limited liability company having its principal place of business at 20 E. Greenway Plaza, Suite 650, Houston, Texas 77046. MEC is a direct, wholly-owned subsidiary of Mercuria Investments US, Inc. (MIUS), a Delaware corporation. MIUS is a direct, wholly-owned subsidiary of Mercuria Energy Group Holding SA (MEGHSA), a Swiss holding company. MEGHSA is a direct, wholly-owned subsidiary of Mercuria Energy Netherlands BV (MENBV) is a Netherlands holding company. MENBV is a direct, wholly-owned subsidiary of Mercuria Holdings (Singapore) Pte Ltd (MEHPTE) is a Singapore holding company. MEHPTE is a direct, wholly-owned subsidiary of Mercuria Energy Group Ltd. (MEGL), a Bermuda

holding company. MEGL is a wholly-owned direct subsidiary of the ultimate parent company of the Mercuria companies, Mercuria Energy Group Holding Ltd. (MEGHL), Cayman Islands holding company.

MEA has two affiliates, Amber Energy Services, LLC (Amber), a Delaware limited liability company having its principal place of business at 20 E. Greenway Plaza, Suite 650, Houston, Texas 77046. Mercuria SJAK TRADING, LLC (SJAK), a Delaware limited liability company having its principal place of business at 20 E. Greenway Plaza, Suite 650, Houston, Texas 77046.

### COMMUNICATIONS

All communications regarding this Application should be directed to:

Jay Michals  
Head of Corporate Responsibility &  
Compliance North America  
20 E. Greenway Plaza, Suite 650  
Houston, TX 77046  
(832) 209 2336  
ComplianceAmericas@mercuria.com

Steven Bunkin  
General Counsel – Americas  
20 E. Greenway Plaza, Suite 650  
Houston, TX 77046  
(203) 413 3376  
sbunkin@mercuria.com

### JURISDICTION OVER ACTIVITY SUBJECT TO THIS APPLICATION

Pursuant to Section 202(e) of the Federal Power Act, 16 U.S.C., § 824a(e), the United States Department of Energy (DOE) has jurisdiction over the export of wholesale electricity from the United States to Canada. In order to effectuate this export activity, MEA will buy and sell wholesale electricity in the wholesale electric markets within the United States and will export electricity transmitted across international transmission facilities to be utilized by Presidential permits issued pursuant to Executive Order 10485, as amended. Accordingly, MEA will rely upon its market based rate authority (MBRA) granted by the FERC.<sup>1</sup> Pursuant to its FERC MBRA, MEA is permitted to make wholesale sales of

---

<sup>1</sup> *Letter Order Accepting Mercuria Energy America, Inc. et al Revised Market-Based Rate Tariff*, Docket No. ER18-873 (April 5, 2018). Mercuria Energy America, Inc. changed its name to Mercuria Energy America, LLC, and FERC approved the name change for the tariff effective January 17, 2020 pursuant to a letter order issued under FERC docket no. ER20-813 issued on March 5, 2020.

electric power and ancillary services in all regions. MEA is a Category 1 Seller in all regions except for the Southeast, where it is a Category 2 Seller. MEA is registered with North American Energy Standards Board (NAESB) as a Purchasing and Selling Entity.<sup>2</sup>

### **DESCRIPTION OF TRANSMISSION FACILITIES**

Applicant hereby applies for authorization to export wholesale electricity to Canada over existing transmission interconnections between the United States and Canada. MEA requests authority to export electricity to Canada over any international transmission facility authorized by Presidential permit that is appropriate for open access transmission by third parties in accordance with the assessment made by the United States DOE of the transmission limits for operation in the export mode, as well as over any international transmission facilities approved in the future.

### **MEA'S ELECTRICITY EXPORT WILL NOT IMPAIR THE SUFFICIENCY OF ELECTRIC SUPPLY ON ITS SYSTEM AND WILL NOT IMPEDE THE REGIONAL COORDINATION OF ELECTRIC UTILITY PLANNING OR OPERATION**

MEA does not currently own, operate or control electric transmission or distribution facilities in the United States over which the export of wholesale electricity could have a reliability, fuel use, or system stability impact, nor is it affiliated with any entity that owns, operates, or controls electric transmission or distribution facilities in the United States over which the export of wholesale electricity could have a reliability, fuel use, or system stability impact. MEA currently is pending approval for *Nevada Cogeneration Associates #1* in Clark County, Nevada United States<sup>3</sup>, therefore, the wholesale electricity that MEA will export using firm or interruptible transmission service will be purchased from other suppliers (i.e. generators, electric utilities and other power marketers) voluntarily and therefore will be

---

<sup>2</sup> Assigned NERC ID: 5246

<sup>3</sup> Nevada Cogeneration Associates #1, the owner and operator of approx. 90 MW gas-fired cogeneration facility located in Clark County, Nevada is wholly owned by Mercuria NCA1 Holdings LLC, an indirect, wholly-owned subsidiary of Mercuria Energy Group Limited.

surplus to the needs of the selling entities. Accordingly, the proposed exports will not impair or tend to impede the sufficiency of electricity supplies in the United States or the regional coordination of electric utility planning or operations. Rather, it will conform to electric system requirements as they may change over time.

In previous orders granting authorization to export wholesale electricity to Canada, DOE has taken into consideration the unique nature of power marketers, like MEA, who do not have franchised service areas and, consequently, do not have native load obligations that could be impaired by exports. MEA offers this as additional supporting information to demonstrate that its export of wholesale electricity to Canada will not impair or tend to impede the sufficiency of electric supplies in the United States or the regional coordination of electric utility planning or operations.

MEA further states that it will comply with all applicable scheduling and reliability standards of the NERC.

### **COMPLIANCE WITH APPLICABLE REGULATIONS, POLICY AND LAWS**

The export activity for which MEA requests authorization is consistent with the United States–Mexico–Canada Agreement (USMCA) and the energy policy of the United States – in that it will enhance efficiency and competition in the North American energy markets. MEA hereby commits to conduct all electricity exports in compliance with all applicable rules and regulations, including the standards and guidelines of NERC, Regional Reliability Councils, control areas and the protocols, tariffs and manuals for all applicable regional transmission organizations or independent system operators.

Because the proposed exports will occur over existing international transmission facilities, MEA respectfully submits that the Application qualifies for a categorical exclusion under the National Environmental Policy Act of 1969, such that neither an environmental assessment nor an environmental impact statement is required.

## **EXHIBITS**

Pursuant to 10 C.F.R. 205.303, the following indicated exhibits are attached hereto:

Exhibit A: Agreements – Not applicable. MEA is requesting blanket authority; authority is not being requested pursuant to a specific agreement.

Exhibit B: Legal Opinion of Mercuria's Counsel

Exhibit C: Transmission System Information

Exhibit D: Non-U.S. Applicant's Power of Attorney – Not Applicable

Exhibit E: Statement of Corporate Relationship or Existing Contract Which in Any Way Relates to the Control or Fixing of Electric Power

Exhibit F: Operating Procedures Regarding Available Capacity and Energy – Not Applicable

## **APPENDICES**

Appendix A: Verification

## **SERVICE OF APPLICATION**

Pursuant to 10 C.F.R. 205.302(h), a copy of this Application is being provided to FERC:

Federal Energy Regulatory Commission  
Attn: Ms. Kimberly Bose  
888 First St. NE  
Washington, DC 20426

**CONCLUSION**

For good cause shown, MEA respectfully requests the DOE issue expedited approval of this Application for blanket authorization to export electricity to Canada for a period of five (5) years.

Respectfully,



---

Cody Moore  
President  
Mercuria Energy America, LLC

Dated: 12/19/2025

**Exhibit B**  
**Opinion of Counsel**



November 26, 2025

Marina Fennel  
Office of Electricity  
United States Department of Energy  
1000 Independence Avenue  
SW, Suite 8H-033  
Washington, D.C. 20585

Re: Application of Mercuria Energy America, LLC for Authority to Export Electricity to Canada  
(Docket No. EA-487-A.)

Dear Ms. Fennel:

I am the General Counsel - Americas for Mercuria Energy America, LLC ("MEA"), and hereby represent MEA in such capacity in connection with its Application for Authority to Export Electricity to Canada (the "Application").

Based on my review of MEA's formation and operating documentation and the authorizations granted to MEA therein (collectively, the "Organization Documentation"):

- The export of electricity described in the Application is within the corporate authorization of MEA as set out in the Organization Documentation.
- In accordance with the Organization Documentation, MEA's officers are authorized to make and provide the Application and to undertake all actions necessary for the provision of the Application, including, once approved, the undertaking of exporting electricity into Canada in the manner described in the Application.

In rendering this opinion, I have relied solely on the Organization Documentation of MEA made available to me by MEA, including, but not limited to, its formation and authorization documentation. Such Organization Documentation confirms the general authorization of MEA to engage in, among other activities, the business of trading of electricity and to qualify for such purpose in any state, territory or dependency of the United States or any foreign country in which it is necessary or expedient for MEA to transact its business.

For purposes of this opinion, I have assumed that all Organization Documentation provided to me has been properly implemented and that all individuals whose signatures appear on any one or more of the Organization Documentation made available to me are the correct and accurate signatures of each such officer whose name appears therein and thereon.

I am furnishing this opinion solely for your exclusive use in connection with the Application. This opinion may not be relied upon for any other purpose or relied upon by or furnished to any other person without my express written consent.

Sincerely,

A handwritten signature in cursive script that reads "Steven Bunkin".

Steven Bunkin  
General Counsel - Americas

**Exhibit C**  
**Transmission System Information**

**INTERNATIONAL TRANSMISSION FACILITIES**

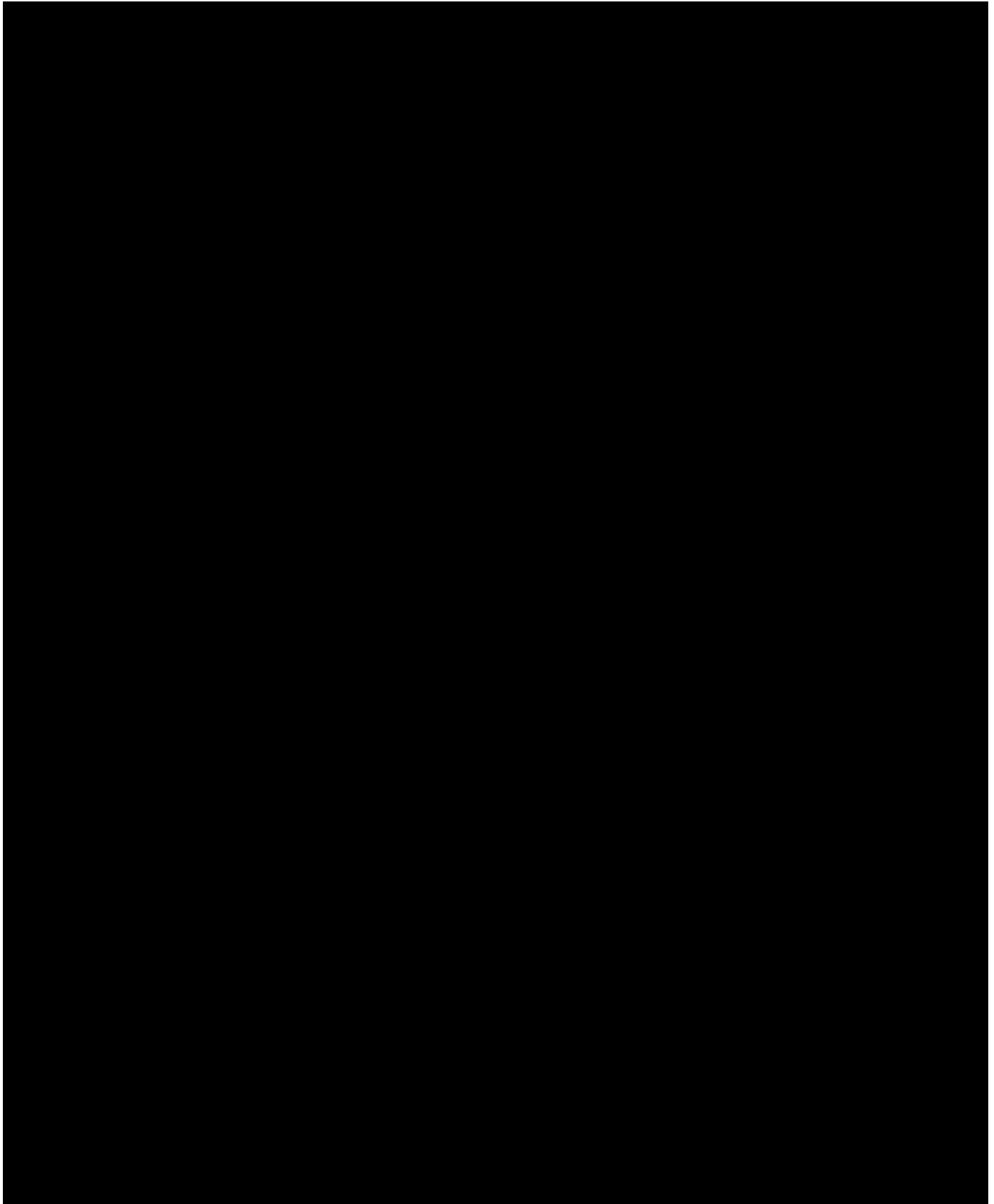
**At the U.S.-Canada Border Authorized for Use by Third Party Transmitters**

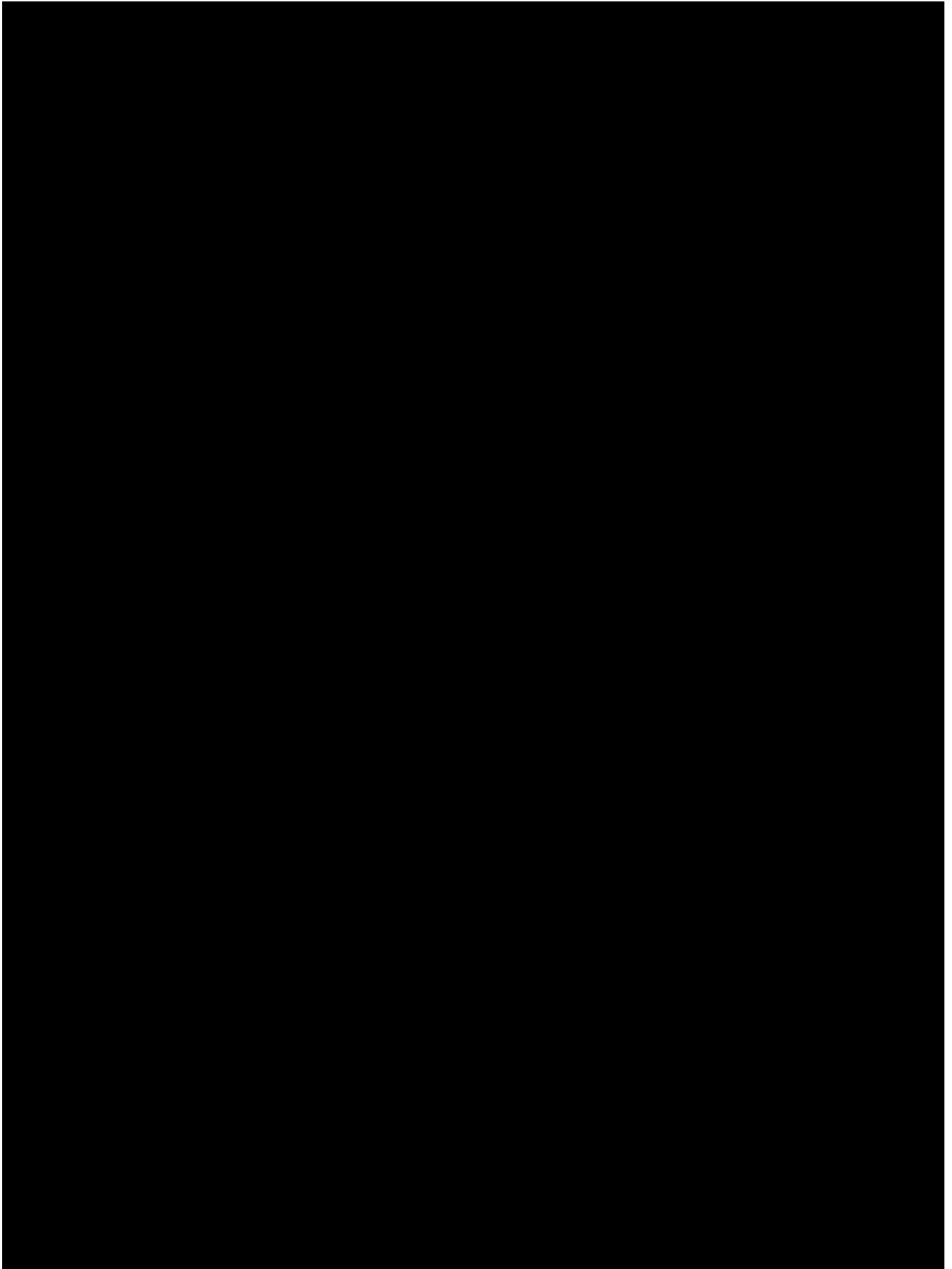
<b>Owner</b>	<b>Location</b>	<b>Voltage</b>	<b>Permit No.</b>
Bangor Hydro-Electric Company	Baileyville, ME	345-kV	PP-89
Basin Electric Power Cooperative	Tioga, ND	230-kV	PP-64
Bonneville Power Administration	Blaine, WA	2-500-kV	PP-10
	Nelway, WA	230-kV	PP-36
	Nelway, WA	230-kV	PP-46
CHPE, LLC	Champlain, NY	±230-kV DC	PP-481
Eastern Maine Electric Cooperative	Calais, ME	69-kV	PP-32
International Transmission Company	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
Highgate Joint Owners	Highgate, VT	120-kV	PP-82-5
Long Sault, Inc.	Massena, NY	2-115-kV	PP-24
Maine Electric Power Company	Houlton, ME	345-kV	PP-43
Maine Public Service Company	Limestone, ME	69-kV	PP-12
	Fort Fairfield, ME	69-kV	PP-12
	Madawaska, ME	138-kV	PP-29
	Aroostook, ME	2-69-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

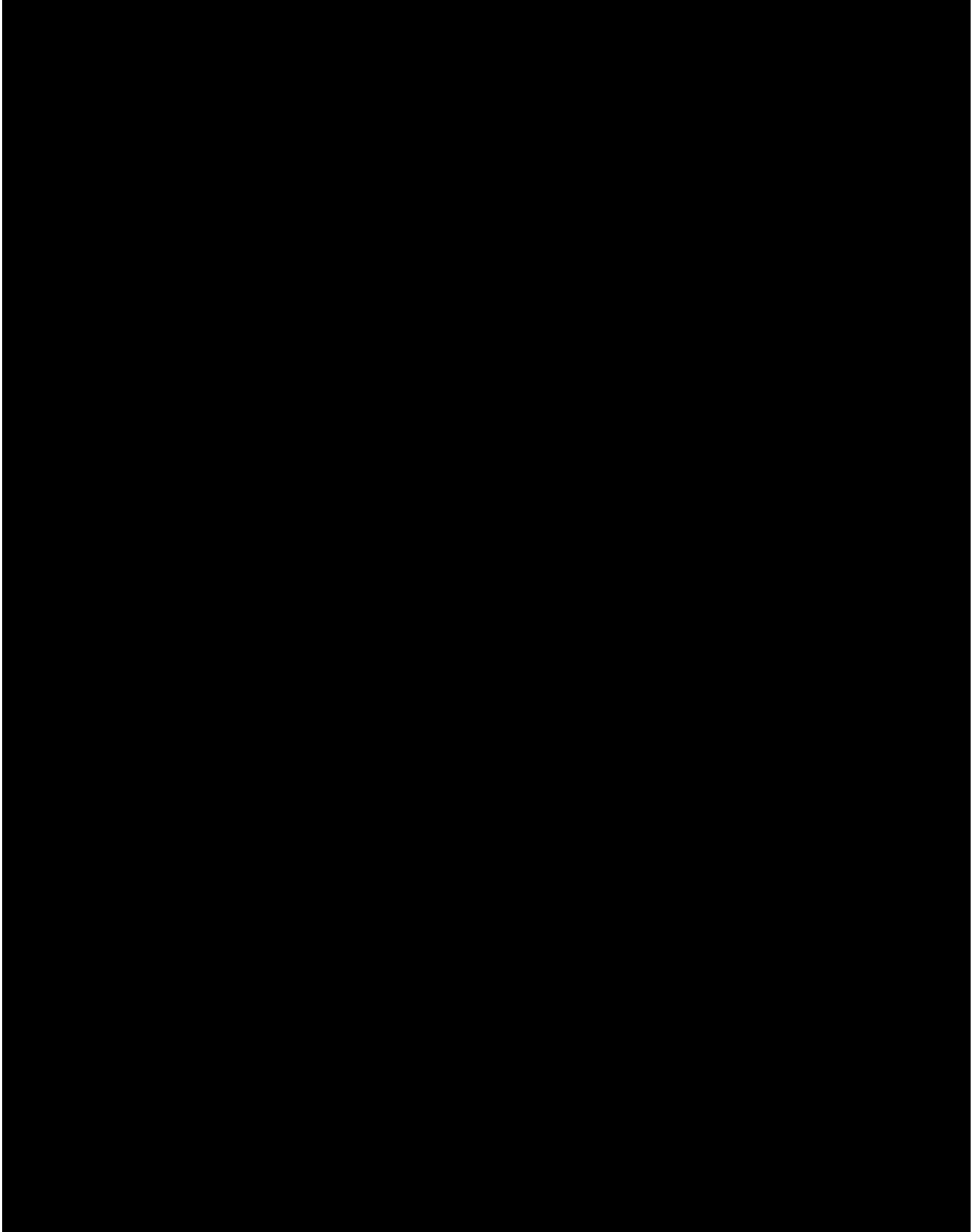
	Massena, NY	2-230-kV	PP-25
	Niagara Falls, NY	2-345-kV	PP-74
	Devils Hole, NY	230-kV	PP-30
Niagara Mohawk Power Corp.	Devils Hole, NY	230-kV	PP-190
Northern States Power Company	Red River, ND	230-kV	PP-45
	Roseau County, MN	500-kV	PP-63
	Rugby, ND	230-kV	PP-231
Sea Breeze Olympic Converter LP	Port Angeles, WA	+450kV DC	PP-299
TDI New England	Alburgh, VT	+320-kV DC	PP-400
Vermont Electric Power Co.	Derby Line, VT	120-kV	PP-66
Vermont Electric Transmission Co.	Norton, VT	+450-kV DC	PP-76

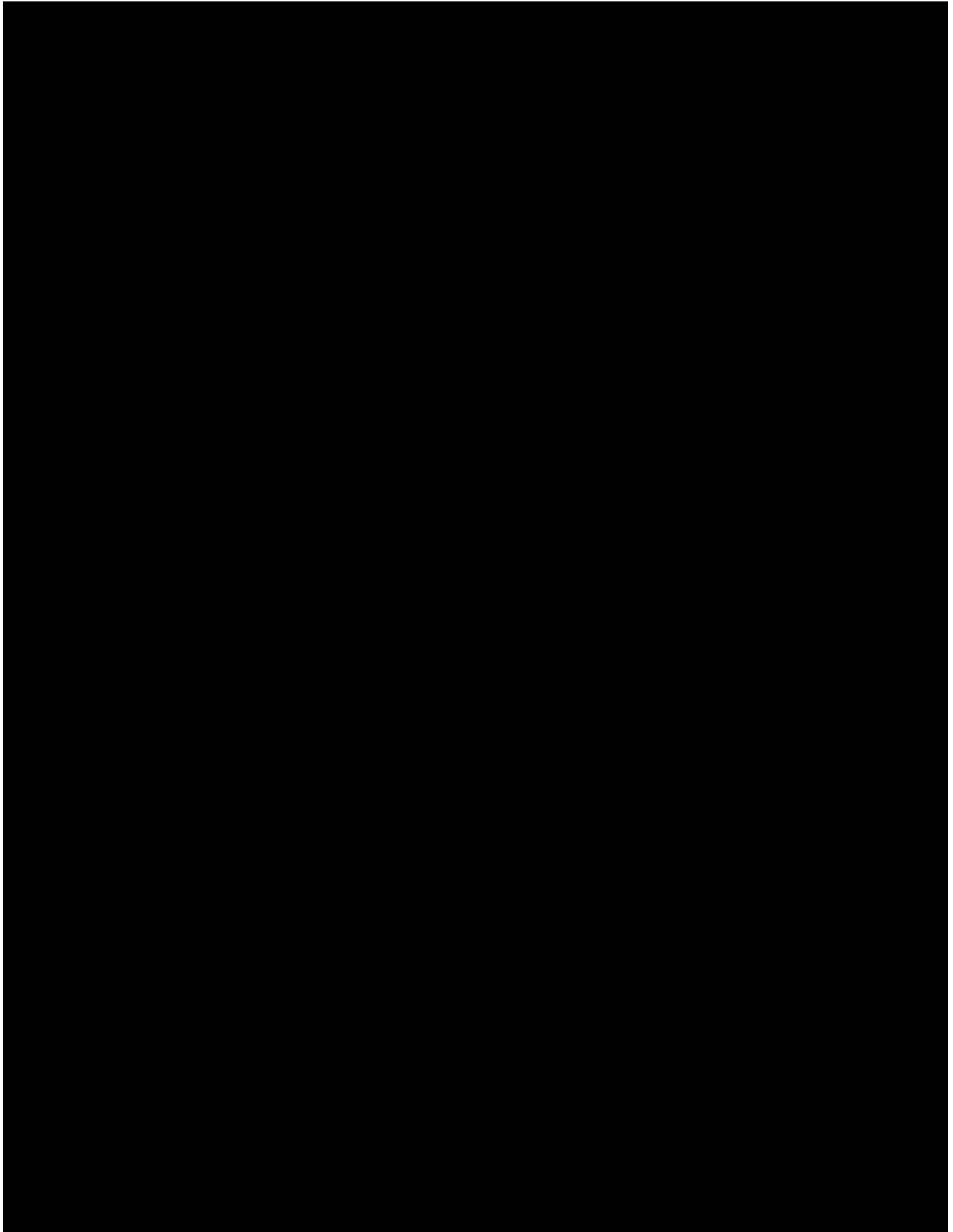
**Exhibit D**

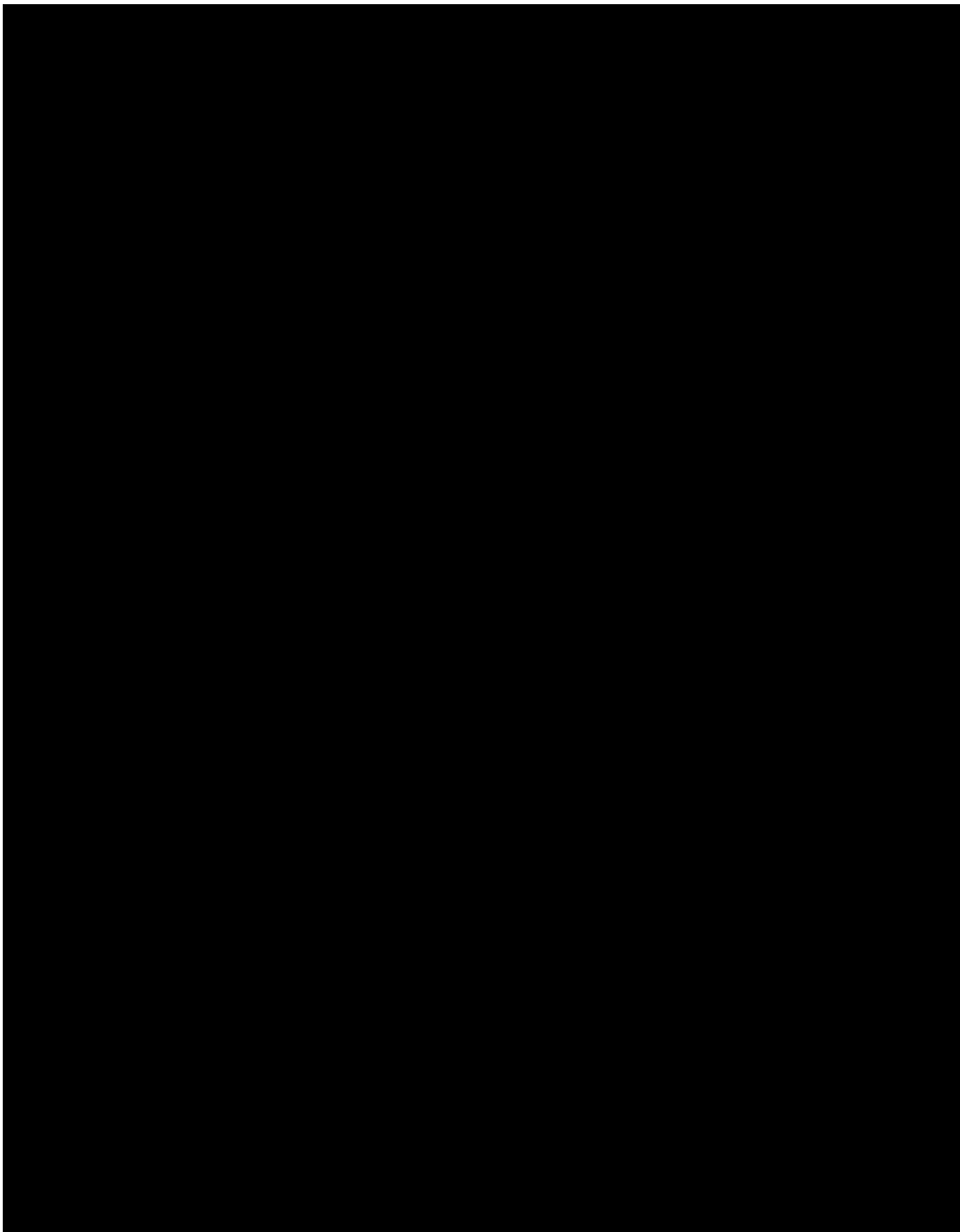
**Statement of Corporate Relationship Which in Any Way  
Relates to the Control of Electric Power**

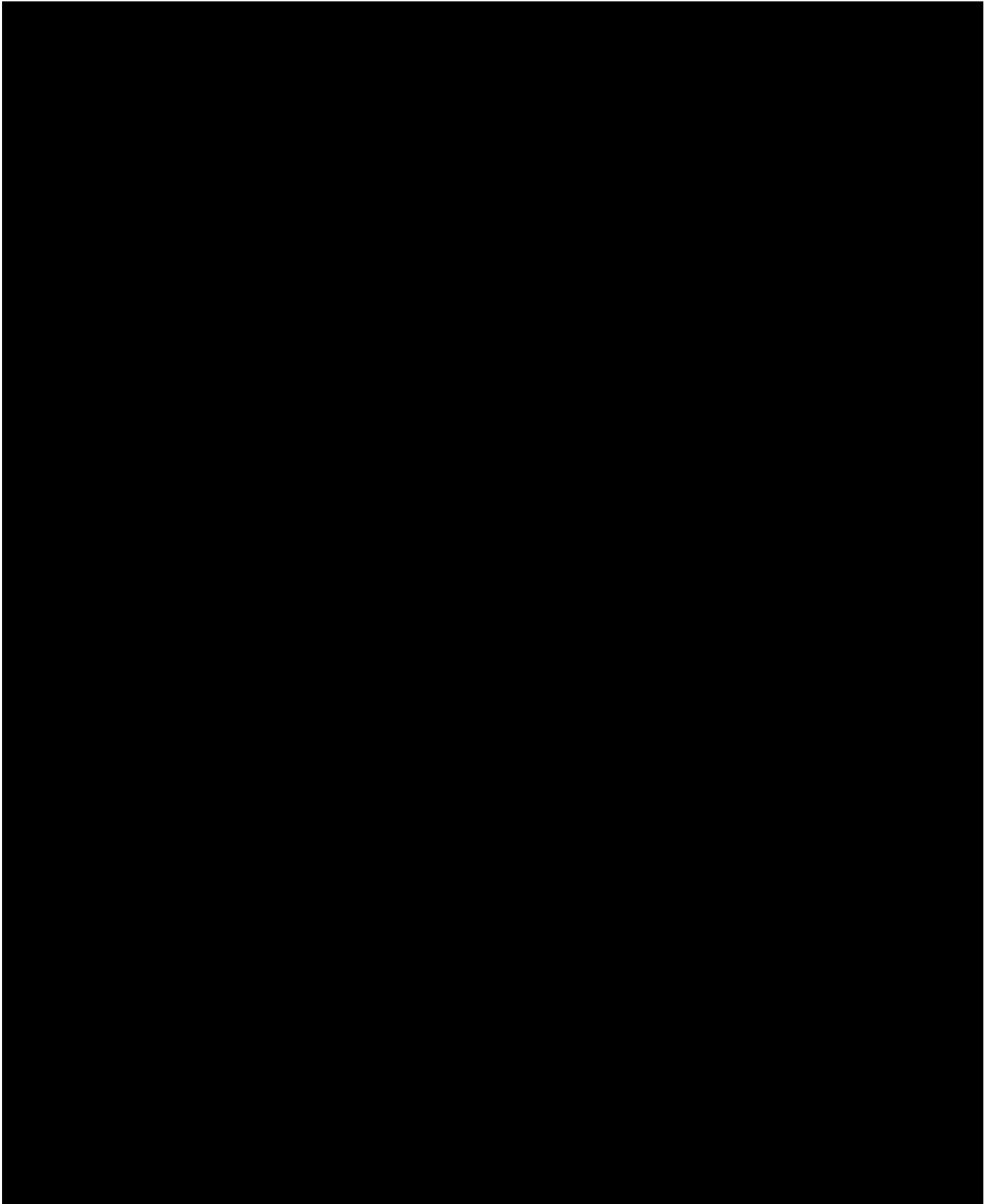


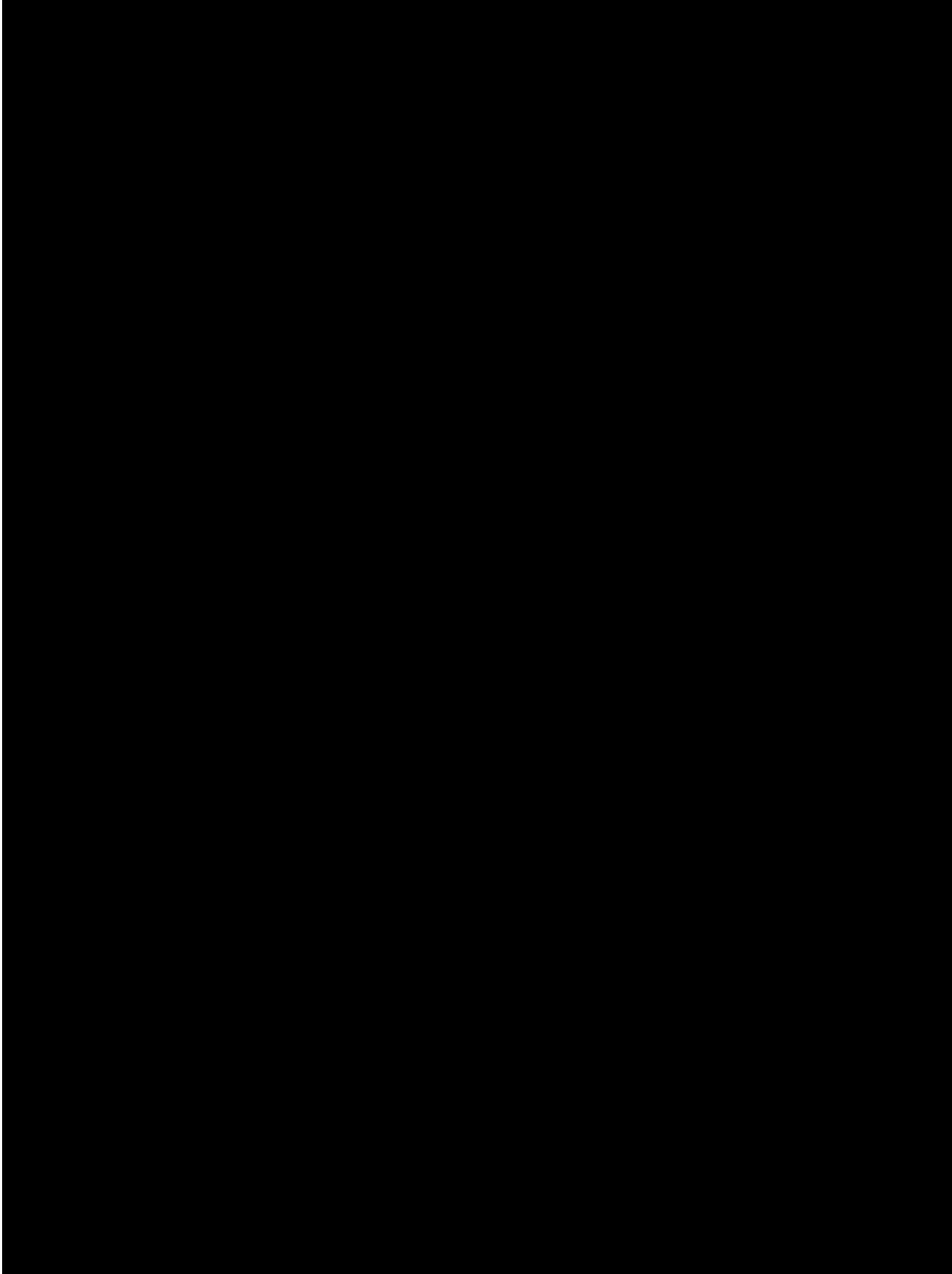


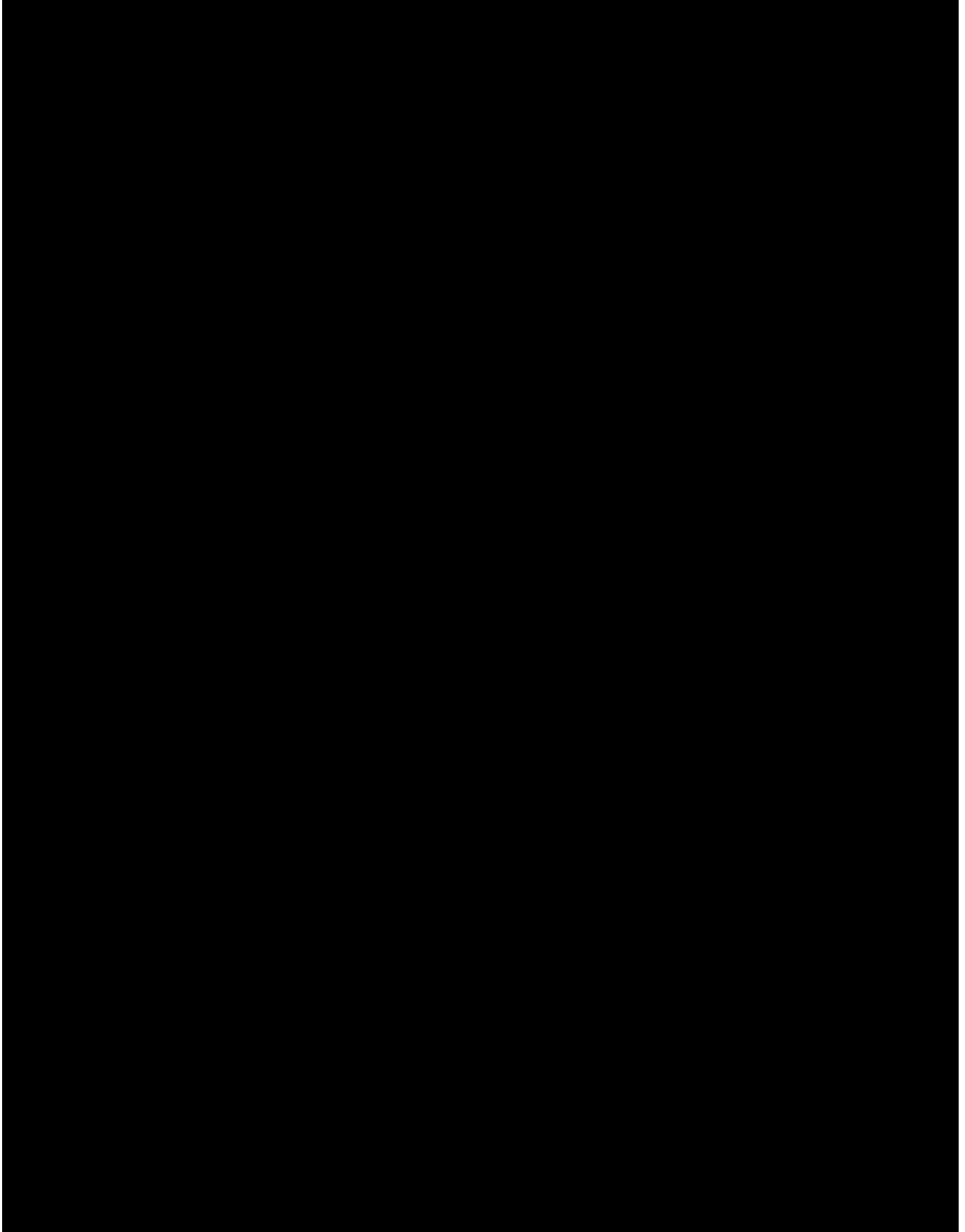


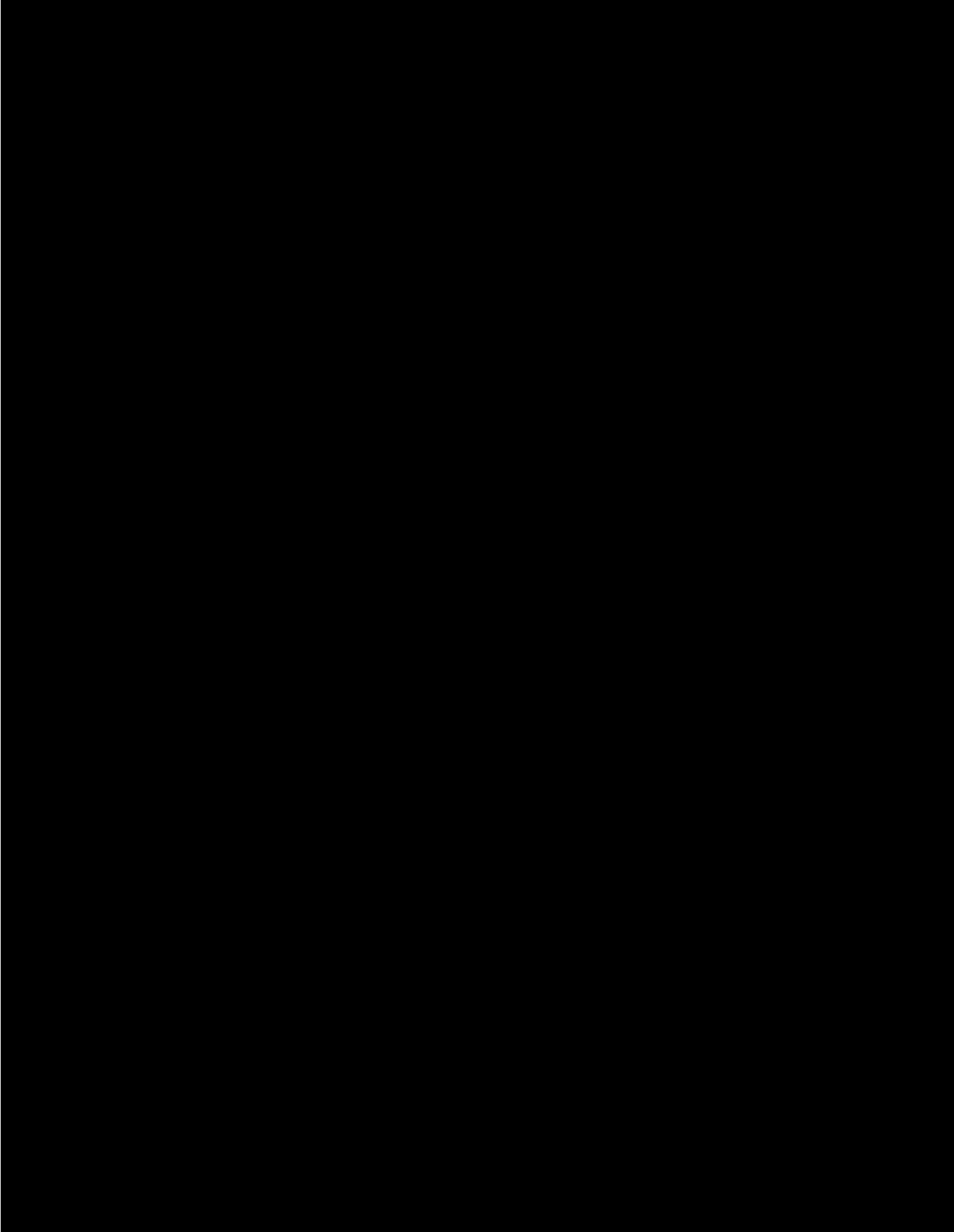


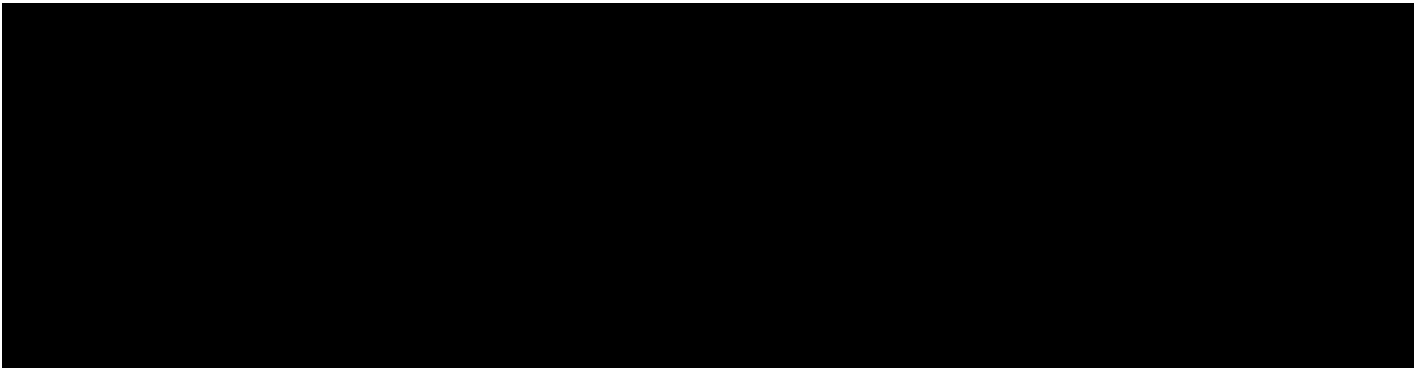
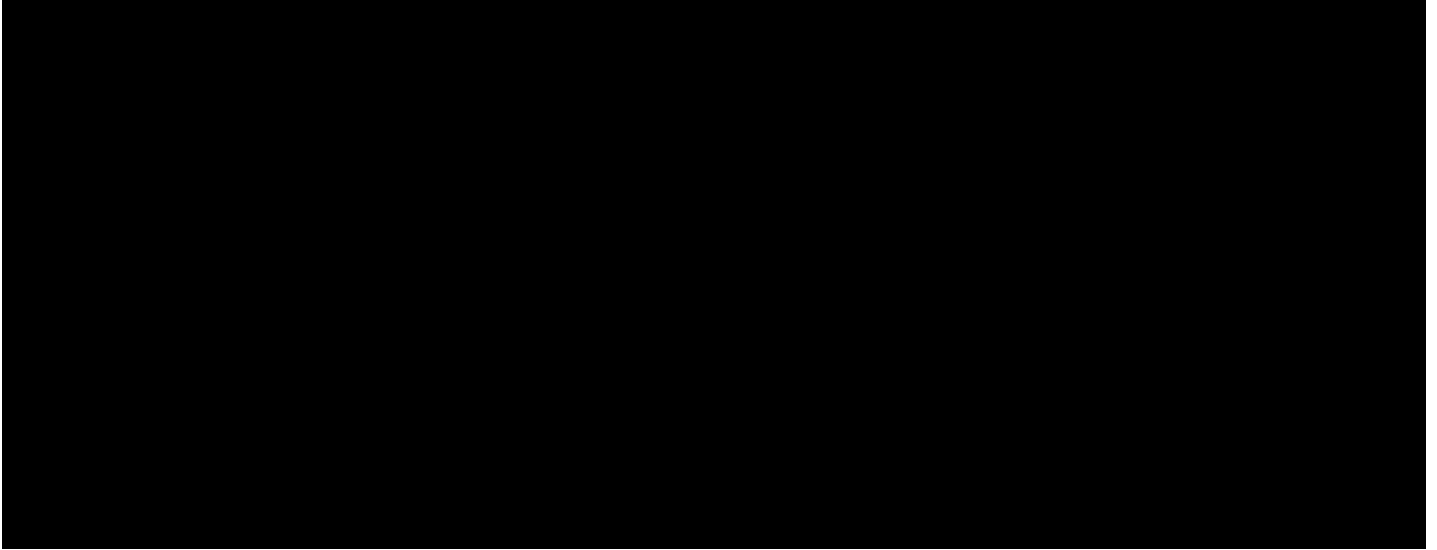












# **Appendix A**

## **Verification**

### VERIFICATION

I, Cody Moore, being authorized to execute this Verification and having knowledge of the matters set forth in this Application of Mercuria Energy America, LLC hereby verify that the content thereof are true and correct to the best of my knowledge and belief.

*Cody Moore*

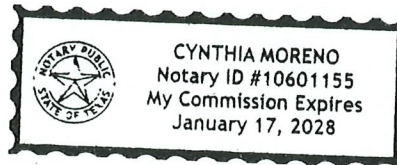
Cody Moore  
President  
Mercuria Energy America, LLC

*Cynthia Moreno*

Signature of Notary

*Cynthia Moreno*

Notary Name (printed)



My Commission Expires