



SIDLEY AUSTIN LLP
60 STATE STREET
BOSTON, MA 02109
+1 617 223 0300
+1 617 223 0301 FAX

AMERICA • ASIA PACIFIC • EUROPE

THEALEY@SIDLEY.COM
+1 617 223 0306

October 2, 2026

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

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

Re: Trafigura Trading LLC
Application for Renewal of Authorization to Transmit Electric Energy to Canada
Docket No. EA-490

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 Trafigura Trading LLC (“Trafigura”) for Renewal of Authorization to Transmit Electric Energy to Canada (the “Application”). As discussed in the Application, Trafigura 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 4, 2026, which is the day after Trafigura’s currently effective authorization expires.

Trafigura has electronically submitted the \$500.00 Application filing fee through the DOE General Collections Form on Pay.gov (Pay.gov Tracking ID: 2869FGJ8, Agency Tracking ID: 77520715212).

Respectfully submitted,

/s/ Terence T. Healey

Terence T. Healey
Sarah A. Tucker
Keturah A. Brown

Counsel for Trafigura Trading LLC

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

Trafigura Trading LLC

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Docket No. EA-490

**APPLICATION OF TRAFIGURA TRADING LLC
FOR RENEWAL OF AUTHORIZATION TO
TRANSMIT ELECTRIC ENERGY TO CANADA**

Trafigura Trading LLC (“Trafigura” or “Applicant”) respectfully requests that the Grid Deployment Office of the United States Department of Energy (“DOE”) renew Trafigura’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 4, 2026, which is the day after Applicant’s currently effective authorization expires. Trafigura 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.*

Trafigura 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 December 3, 2021 in Order No. EA-490 (“Export Order”). Trafigura 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, Trafigura’s current electricity export authorization will expire on December 3, 2026. Therefore, Trafigura respectfully requests action on this Application and renewed export authorization on or before December 3, 2026, with an effective date of December 4, 2026.

I. DESCRIPTION OF APPLICANT

Applicant is a Delaware limited liability company with its principal place of business in Houston, Texas. Applicant is a wholly-owned subsidiary of Trafigura US Inc. (“TUSI”), a Delaware corporation, which itself is a wholly-owned subsidiary of the Singapore-registered company Trafigura Group Pte. Ltd. (“TGPL”) which is the main holding company for the Trafigura group. Trafigura Beheer B.V. (“TBBV”), a company registered in the Netherlands, holds 100% of the shares of TGPL. The ultimate controlling party of TBBV is the Farringford Foundation (“FF”), a private interest foundation under Panamanian law which ultimately controls 99% of the voting rights in TBBV, which in turn holds 100% of the voting rights in TGPL. FF was established in 2019 as the control entity for the Trafigura group and is controlled by its council members (as a Panamanian private interest foundation has no shareholders) who are also directors of TGPL.

Applicant operates as a commodity trading company, engaged in the physical distribution and trading of crude oil and petroleum products, and other energy and non-energy commodities. Applicant markets and sells wholesale power, capacity, ancillary services and related services in various markets in the United States, including Independent System Operators (“ISOs”) and Regional Transmission Organizations (“RTOs”). Applicant is not seeking authorization to export power on behalf of, or in conjunction with, any partners or partnerships. Applicant engages 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.

Trafigura is one of the world’s largest independent suppliers of minerals, metals and energy, operating in more than 150 countries and employing over 14,500 people across 50 countries, including Canada. Our core function is to connect producers with end-customers,

absorbing operational risk on both sides of the supply chain. Applicant has been granted authority to sell energy and capacity at wholesale at market-based rates and is subject to the Federal Energy Regulatory Commission's ("FERC") jurisdiction.¹ Except as described herein, none of Applicant or its affiliates owns or controls any electric generation or transmission facilities, physical natural gas transportation or storage facilities or other essential inputs to electric power production.

Applicant is affiliated with Wolverine Fuels, LLC ("Wolverine") and Mountain Creek Power, LLC ("Mountain Creek"). Wolverine owns and operates coal mines in Utah and Colorado. Mountain Creek is an 808 MW gas-fired power plant, located in Texas.² None of Applicant or its affiliates is a franchised utility or affiliated with any franchised utilities in North America.

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

A. Exact legal name of Applicant.

Trafigura Trading LLC

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.

Eduardo Pigretti
Regional Counsel
Trafigura Trading LLC
845 Texas Ave Ste 3600
Houston, TX 77002
Tel: (832) 203-6402

Terrence T. Healey
Sidley Austin LLP
60 State Street, 36th Floor
Boston, MA 02109
Tel: (617) 223-0306
Thealey@sidley.com

¹See *Trafigura Trading LLC*, Docket No. ER20-2063-000 (August 13, 2020) (Letter Order accepting Trafigura Trading LLC's application for market-based rate authority with an accompanying tariff under ER20-2063).

² Applicant is also currently affiliated with several electric generation facilities located in the Northeast region, each of which has been granted market-based rate authority. One such facility owns certain limited transmission facilities that are necessary to accommodate interconnection to the transmission grid. These transmission facilities are subject to the operational control of PJM Interconnection, L.L.C. ("PJM") and the terms and conditions of PJM's open access transmission tariff. FERC recently authorized a transaction pursuant to which these facilities will be sold and no longer affiliated with Applicant. See *Bridgeport Energy LLC, et al.*, 196 FERC ¶ 61, 107 (Aug. 5, 2026).

Eduardo.pigretti@trafigura.com

Sarah Tucker
Keturah A. Brown
Sidley Austin LLP
1501 K Street, N.W.
Washington, D.C. 20005
(202) 736-8142
stucker@sidley.com
keturah.brown@sidley.com

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.

Trafigura is a Delaware limited liability company with its principal place of business in Houston, Texas. Trafigura 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 Canada. No other Federal, State, or local government entity or agency has jurisdiction over the proposed exports described in this application, except to the extent that Applicant must comply with applicable FERC requirements in making sales at wholesale. FERC's address is:

Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

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 hereby renews its application for authorization to transmit electric power to Canada as a power marketer over any authorized international transmission facility that is appropriate for open access transmission by third parties in accordance with the export limits authorized by DOE. Applicant plans to export electric power over authorized transmission

interconnections between Canada and the United States. Such sales would be made in foreign commerce at the U.S. – Canada border. Transmission to the point of delivery will be arranged by Applicant over any of the existing international electronic transmission facilities set out in Attachment 1, and over any international transmission facilities that may be approved by the Department in the future.

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.

As noted above, except as described herein, 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 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, nor is Applicant affiliated with any utility that has a franchised service territory in the United States.

Applicant will purchase the electric power to be exported in the markets in which it participates, on a firm or interruptible basis, which 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. Any power purchased by Applicant for export would be surplus to the needs of those entities selling power to Applicant.³ Accordingly, as required by FPA Section 202(e), the proposed exports will not impair or tend to impede the sufficiency of electric power supplies in the United States or the regional coordination

³ See *NRG Power Marketing LLC*, Order No. EA-220-D (February 1, 2021) at p. 6.

of electric utility planning or operations.⁴ 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 Attachment 1. Specifically, Applicant does not have the ability to cause total exports on Presidential Permit facilities to exceed the authorized instantaneous transmission rate.⁵

Applicant will make all necessary commercial arrangements and will obtain any and all other regulatory approvals required in order to carry out any power exports. This would 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 Canada. The controls that are inherent in any transaction that complies with all NERC requirements and the export limits imposed by the Department on the international transmission facilities are sufficient to ensure that exports by Applicant would not impede or tend to impede the coordinated use of transmission facilities within the meaning of FPA Section 202(e).

In previous orders granting export authorizations to electric power marketers, the Department declined to rigidly apply the information filing requirements contained in its regulations and instead used a flexible approach which takes into consideration the unique nature

⁴ *Id.* at p. 7.

⁵ *Id.* at p. 6.

of power marketers and previously authorized export limits of cross-border facilities.⁶ These same considerations demonstrate that Applicant's proposed exports 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.

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, Trafigura 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.

Not applicable.

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.

⁶ See, e.g., *Powerex Corp.*, Order No. EA-171-E (September 10, 2020); *Roctop Investments Inc.*, Order No. EA-414-A (September 29, 2020); *Manitoba Hydro*, Order No. EA-281-C (November 10, 2020); *Vitol Inc.*, Order No. EA-370-B (November 10, 2020); *CWP Energy, Inc.*, Order No. EA-410-B (December 9, 2020); *MAG Energy Solutions, Inc.*, Order No. EA-306-C (January 12, 2021); *Mercuria Energy America, LLC*, Order No. EA-487 (January 21, 2021); *Direct Energy Marketing Inc.*, Order No. EA-280-C (February 1, 2021); *NRG Power Marketing LLC*, Order No. EA-220-D (February 1, 2021).

A list of currently authorized transmission facilities is provided in lieu of a map and is attached hereto as Attachment 1.

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, Trafigura 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 4, 2026.

Respectfully submitted,

/s/ Terence T. Healey

Terence T. Healey
Sarah A. Tucker
Keturah A. Brown

Counsel for Trafigura Trading LLC

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

Trafigura Trading LLC

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Docket No. EA-490

VERIFICATION

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

/s/ 

Eduardo Pigretti
Regional Counsel
Trafigura Trading LLC

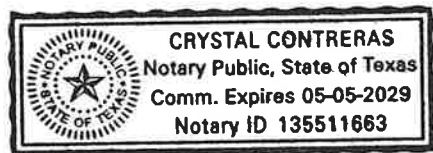
A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document

STATE OF TEXAS

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COUNTY OF HARRIS

Subscribed and sworn to (or affirmed) before me on the 1st day of October, 2026 by
Eduardo Pigretti, proved to me on the basis of satisfactory evidence to be the person(s)
who appeared before.




Name: Crystal Contreras
Notary Public in and for said State

Attachment 1**List of Existing International Electric Transmission Facilities**

Present Owner	Location	Voltage	Presidential Permit No.⁷
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	2-5-kV	PP-10
	Nelway, WA	230-kV	PP-36
	Nelway, WA	230-KV	PP-46
Champlain Hudson Power Express	Champlain, NY	+/-320-kV	PP-362** ⁸
Eastern Maine Electric Cooperative	Calais, ME	69-kV	PP-32
Houlton Water Company	Houlton, ME	69-kV	PP-435
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, PA	320-kV	PP-412**
Joint Owners of the Highgate Project	Highgate, VT	120-kV	PP-82
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
	Madwaska, 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

⁷ Presidential permit numbers refer to the generic DOE docket number for the relevant permit including any subsequent amendments to the original permit authorizing the facility as of March, 2021.

⁸ ** Transmission facilities that have been authorized by DOE but not constructed or placed into service.

Montana Alberta Tie Ltd.	Cut Bank, MT	230-kV	PP-305
NECEC Transmission LLC	Franklin County, ME	+/-320-kV DC	PP-438**
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 Pass Transmission LLC	Deerfield, NH	300-kV	PP-371
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	Pott Angeles, WA	±450-kV DC	PP-299
Vermont Electric Power Co.	Derby Line, VT	120-kV	PP-66
TDI New England	Alburgh, VT	±320-kV DC	PP-400
Vermont Electric Transmission Co.	Norton, VT	±450-kV DC	