

JUN 28 2019

UNITED STATES OF AMERICA
BEFORE THE
DEPARTMENT OF ENERGY
OFFICE OF ELECTRICITY

Electricity Delivery and
Energy Reliability

Docket No.

EA-477

American L&P Co
dba American Light
& Power

**APPLICATION OF AMERICAN L&P CO dba AMERICAN LIGHT & POWER
FOR AUTHORIZATION TO TRANSMIT ELECTRIC ENERGY TO MEXICO**

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.*, American L&P Co dba American Light & Power (AL&P) hereby files with the Department of Energy ("DOE" or the "Department") an original and two (2) copies of the instant application ("Application") for blanket authority to transmit electric energy from the United States to Mexico. AL&P respectfully requests authorization to transmit electricity from the United States to Mexico for a term of five years.

I. DESCRIPTION OF THE APPLICANT

AL&P is a Texas corporation, with its principal place of business in Houston, Texas. AL&P's business is a licensed retail electric provider (REP) in the purchase and sale of wholesale electricity, capacity, and ancillary services at market-based rates in the Electric Reliability Council of Texas, Inc. (ERCOT) to Industrial, Medium and Small Commercial, and Residential customers throughout the Texas ERCOT deregulated market. AL&P has been granted authority by the Department of Energy (DOE), on December 31, 2018, under section 3 of the Natural Gas Act (NGA) for blanket authorization to import and export up to a combined total of 25 billion cubic feet (Bcf) of natural gas from and to Mexico via pipeline; FE Docket No. 18-187-NG; DOE/FE Order No. 4327.

AL&P does not own or control any electric power generation or transmission facilities and does not have a franchised electric power service area. AL&P only operates as a competitive retail electric provider.

II. COMMUNICATIONS

Communications regarding this Application should be addressed to the following person:

AL&P

Scott Evans
President
American Light &
Power
15810 Park Ten Place
Suite 380, Houston,
TX 77084
sevans@americanlp.com

III. JURISDICTION

Under Section 202(e) of the FPA, 16 U.S.C. § 824a(e), and DOE's regulations, 10 C.F.R. § 205.300 *et seq.*, any person seeking to transmit electric energy from the United States to a foreign country must first secure an order from DOE authorizing the export. No other known federal, state or local government has jurisdiction over the actions to be taken under the authority set out in this application.

IV. TECHNICAL DISCUSSION OF PROPOSAL

AL&P seeks authority to transmit electric energy to Mexico. AL&P intends to export power over existing transmission interconnections between the United States and Mexico. Exhibit C to this Application provides the location and description of the transmission facilities through which the electric energy may be delivered into Mexico and includes the name of the facility owners as well as the Presidential Permit numbers.

AL&P will purchase surplus electric energy from electric utilities and other suppliers within the United States and will export this energy to Mexico over the international electric transmission facilities. The present owners of the transmission facilities are listed in Exhibit C. Because this electric energy will be purchased from others voluntarily, it will be surplus to the needs of the selling entities. AL&P's export of power will not impair the sufficiency of electric power supply in the U.S.

AL&P will make all necessary commercial arrangements and will obtain any and all other regulatory approvals required in order to effect any power exports. This will include:

- (1) scheduling each transaction with the appropriate control area in compliance with all reliability criteria, standards, and guidelines of the North American Electric Reliability Corporation ("NERC") and applicable Regional Entities in effect at the time of export;
- (2)

obtaining all necessary transmission access over the existing facilities listed in Exhibit C; and (3) providing evidence of the agreements with transmission owners to DOE.

Consistent with past DOE precedent, AL&P requests that DOE use the reliability analyses performed in the most recent export authorization proceedings that rely upon the border transmission facilities referenced in Exhibit C. AL&P agrees to abide by the export limits of these transmission facilities. The controls that are inherent in any transaction that complies with all NERC requirements and the export limits imposed by DOE on the referenced transmission facilities are sufficient to ensure that exports by AL&P will not impede or tend to impede the coordinated use of transmission facilities within the meaning of Section 202(e) of the FPA.

V. PROCEDURES

AL&P is willing to accept all conditions imposed by the Department of Energy on its authorization to export power. In particular, if required by DOE, exports made by AL&P will not exceed the export limits for the transmission facilities utilized by AL&P, or otherwise cause a violation of the terms and conditions set forth in the export authorization. When scheduling the delivery of power, AL&P will comply with the applicable NERC reliability criteria, standards, and guidelines. AL&P will provide DOE with all required reports indicating the gross amount of electricity delivered to Mexico, consideration received during each month, and the maximum hourly rate of transmission, as well as any additional annual reports required.

VI. SERVICE AND FEE.

In accordance with the requirements of 10 C.F.R. § 205.309, copies of this application will be provided to the following:

Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.W.
Washington, D.C. 20426

A check in the amount of \$500.00 made payable to the U.S. Department of Treasury is enclosed in payment of the fee specified in 10 C.F.R. § 205.309.

VII. VERIFICATION

Verification executed by Applicant's authorized representative, Scott Evans, President, in accordance with 10 C.F.R. § 205.302(h) is enclosed with this Application.

VIII. EXHIBITS

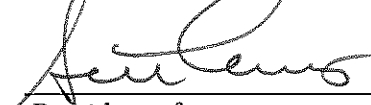
In accordance with the requirements of 10 C.F.R. § 205.303, the following exhibits are attached hereto:

- Exhibit A Transmission Agreements
- Exhibit B Opinion of Counsel
- Exhibit C International Transmission Facilities (Submitted in lieu of Maps)
- Exhibit D Power of Attorney
- Exhibit E Statement of Any Corporate Relationship or Existing Contract
- Exhibit F Operating Procedures

IX. CONCLUSION

WHEREFORE, AL&P respectfully requests that this Application for Authorization to Transmit Electric Energy to Mexico be considered and approved.

Respectfully Submitted,




*President of
American L&P Co, dba American Light &
Power*

Dated: June 25, 2019

VERIFICATION

I, Scott Evans, President, of American L&P Co dba American Light & Power, having knowledge of the matters set forth in the above Application for Authorization to Transmit Energy to Mexico, hereby verify that the contents thereof are true and correct to the best of my knowledge and belief.



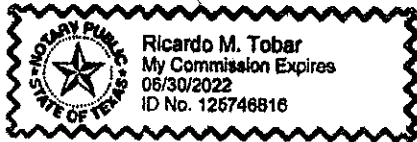
Signature

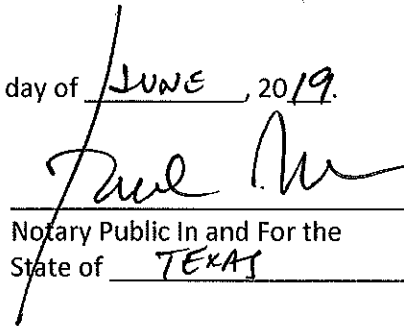
Scott Evans

Typed or Printed Name
President

Title of Signatory

SWORN TO AND SUBSCRIBED before me on the 25th day of JUNE, 2019.





Notary Public In and For the
State of TEXAS

My commission expires: JUNE 30, 2022

EXHIBIT A
TRANSMISSION AGREEMENTS

Not Applicable

EXHIBIT B

Statement of Opinion of Counsel

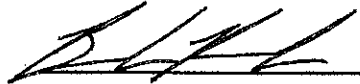
This opinion is rendered in connection with the Application of American L&P Co dba American Light & Power ("AL&P") for Authorization to Transmit Electric Energy to Mexico, dated June 25, 2019, and pursuant to 10 C.F.R. Section 205.303(b).

Based on my understanding and review of AL&P, my knowledge of the corporate powers of AL&P, and my examination of such documents, records and matters of laws as I have considered to be relevant, it is my opinion that:

1. The proposed exports of electrical power described in the Application are within the corporate powers of AL&P; and
2. AL&P has complied and will comply with all pertinent Federal and State laws.

I am opining herein only as to federal laws of the United States and laws of relevant States within the United States, and I express no opinion as to the laws of any other jurisdiction. I am not assuming any obligation to review or update this opinion should the law or existing facts or circumstances change. This opinion is provided by me as counsel for AL&P solely to you for your exclusive use and is not to be made available to or relied upon by any other person or entity without my prior written consent.

Respectfully Submitted,



Dated: June 25, 2019

EXHIBIT C

International Transmission Facilities At the U.S.-Mexico Border Authorized for Use by Third-Party Transmitters

Present Owner	Location	Voltage	Presidential Permit No
Comisión Federal de Electricidad	FalconDam, Texas	138-kV	NA ²
	Redford, Texas	7.2-kV	PP-51
	Presidio, Texas	13.8-kV	PP-03
Baja California Power, Inc.	Imperial Valley, CA	230-kV	PP-234
Generadora del Desierto -WAPA	San Luis, AZ	230-kV	PP-304
AEP Texas Inc.	Brownsville, Texas	138-kV	PP-425
	Brownsville, Texas	69-kV	PP-425
	Laredo, Texas	138-kV	PP-423
	Laredo, Texas	230-kV	PP-423
	Eagle Pass, Texas	138-kV	PP-424
El Paso Electric Company	Diablo, NM	115-kV	PP-92
	Ascarate, Texas	115-kV	PP-48
San Diego Gas & Electric	Miguel, CA	230-kV	PP-68-2
	Imperial Valley, CA	230-kV	PP-79
Sharyland Utilities	McAllen, Texas	138-kV	PP-285

² The international transmission facilities consisting of a 138-kV line at Falcon Dam 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, rather than by Presidential Permit.

EXHIBIT D
POWER OF ATTORNEY

Not Applicable

EXHIBIT E
Statement of Any Corporate Relationship or Existing Contract

Not Applicable.

EXHIBIT F.
OPERATING PROCEDURES

Not Applicable