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

Fuel Market LP

Docket No.

# APPLICATION OF FUEL MARKET LP FOR AUTHORIZATION TO TRANSMIT ELECTRIC ENERGY TO MEXICO

Pursuant to Section 202(e) of the Federal Power Act ("FPA"), 16U.S.C.§ 824a(e), and IO C.F.R. §§ 205.300 *et seq.*, FUEL MARKET LP 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. FUEL MARKET LP respectfully requests authorization to transmit electricity from the United States to Mexico for a term of fiveyears.

### I. DESCRIPTION OF THE APPLICANT

FUEL MARKET LP is a Texas corporation, with its principal place of business in Houston. Our business model is to manage and procure energy needs for our clients in the United States and Mexico, like diesel, gasoline, LPG, electricity, natural gas, and LNG. FUEL MARKET LP has been granted authority by the Department of Energy (DOE), on June 5, 2020, under section 3 of the Natural Gas Act (NGA) for blanket authorization to import and export up to a combined total of 12.25 billion cubic feet (Bcf) of natural gas to Mexico via pipeline; FE Docket No. 20-53-NG; DOE/FE Order No. 4543.

FUEL MARKET LP does not own or control any electric power generation or transmission facilities and does not have a franchised electric power service area. FUEL MARKET LP does not operate as a retail electricity provider and will only transact to export electricity into Mexico.

### II. COMMUNICATIONS

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

Genaro Gomez General Partner Fuel Market LP 4545 Post Oak Place Drive Suite 217 Houston, TX 77027 genaro@gfint.com

#### III. JURISDICTION

Under Section202(e) of the FPA, 16U.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

FUEL MARKET LP seeks authority to transmit electric energy to Mexico. FUEL MARKET LP 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.

FUEL MARKET LP 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. FUEL MARKET LP's export of power will not impair the sufficiency of electric power supply in the U.S.

FUEL MARKET LP will make all necessary commercial arrangements and will obtain any and all other regulatory approvals required in order to effect any power export. This will include:

(I) 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, FUEL MARKET LP 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. FUEL MARKET LP 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 export by FUEL MARKET LP 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

FUEL MARKET LP is willing to accept all conditions imposed by the Department of Energy on its authorization to export power. In particular, if required by DOE, expo1ts made by FUEL MARKET LP will not exceed the export limits for the transmission facilities utilized by FUEL MARKET LP, or otherwise cause a violation of the terms and conditions set forth in the export authorization. When scheduling the delivery of power, FUEL MARKET LP will comply with the applicable NERC reliability criteria, standards, and guidelines. FUEL MARKET LP 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 IO 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, FUEL MARKET LP respectfully requests that this Application for Authorization to Transmit Electric Energy to Mexico be considered and approved.

Respectfully Submitted,

Genaro Gomez, General Partner

Fuel Market LP

Dated: June 8, 2020

#### VERIFICATION

I, Genaro Gomez, General Partner, of Fuel Market LP, 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

GENARO GOMEZ

Typed or Printed Name

th day of NWE

Notary I ublicand For the

State of

ABDULGHAFUR BARADIA Notary Public, State of Texas Comm. Expires 02-07-2023 Notary ID 126476393

# EXHIBIT A TRANSMISSION AGREEMENTS

Not Applicable

**EXHIBITB** 

Statement of Opinion of Counsel

This opinion is rendered in connection with the Application of FUEL MARKET LP for

Authorization to Transmit Electric Energy to Mexico, dated June 8, 2020, and pursuant to 10 C.F.R.

Section 205.303(b).

1. Based on my understanding and review of FUEL MARKET LP, my knowledge of the

corporate powers of FUEL MARKET LP, and my examination of such documents, records

and matters of laws as I have considered to be relevant, it is my opinion that:

2. The proposed exports of electrical power described in the Application are within the corporate

powers of FUEL MARKET LP; and

FUEL MARKET LP 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 FUEL MARKET LP 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,

2/1//

Dated: June 10 , 20 ZU

9

#### **EXHIBITC**

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

Present Owner	Location	Voltage	Presidential
			Permit No
Comision Federal de Electricidad	Falcon Dam, Texas	138-kV	NA <sup>2</sup>
	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 Imperial	230-kV	PP-68-2
	Valley, CA	230-kV	PP-79
Sharyland Utilities	McAllen, Texas	138-kV	PP-285

<sup>&</sup>lt;sup>2</sup> 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 Pe1mit.

# 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



## Fwd: Pay.gov Payment Confirmation: DOE General Collections Form

1 message

**Genaro Gomez** <genaro@gfint.com>
To: Mary Jones <mary@gfint.com>

Tue, Jun 9, 2020 at 1:28 PM

----- Forwarded message -------From: <notification@pay.gov> Date: Tue, Jun 9, 2020, 1:26 PM

Subject: Pay.gov Payment Confirmation: DOE General Collections Form

To: <genaro@gfint.com>



An official email of the United States government



Your payment has been submitted to Pay.gov and the details are below. If you have any questions regarding this payment, please contact Carol Fuster at (301) 903-0534 or carol.fuster@hq.doe.gov.

Application Name: DOE General Collections Form

Pay.gov Tracking ID: 26P5KO3T Agency Tracking ID: 76006729968

Transaction Type: Sale

Transaction Date: 06/09/2020 02:26:01 PM EDT

Account Holder Name: Genaro Gomez

Transaction Amount: \$500.00 Card Type: AmericanExpress Card Number: \*\*\*\*\*\*\*\*\*5003

Payment Type: Other

Bill Number: PO Number: WFO Number:

Other: Credit Card - AMEX

Comments: Fuel Market LP - Export Authorization Application, Docket No. EA-483 Attn: Christopher Lawrence,

Christopher.Lawrence@hq.doe.gov

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.



Pay.gov is a program of the U.S. Department of the Treasury, Bureau of the Fiscal Service