

FEB 5 2013

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

Electricity Delivery and
Energy Reliability

)
)
Shell Energy North America (US), L.P.)

Docket No. EA- 339-A

**RENEWAL APPLICATION OF
SHELL ENERGY NORTH AMERICA (US), L.P.
FOR AUTHORITY TO
TRANSMIT ELECTRIC ENERGY TO CANADA**

Shell Energy North America (US), L.P., a Delaware limited partnership ("Shell Energy" or "Applicant"), pursuant to section 202(e) of the Federal Power Act ("FPA") (16 U.S.C. § 824a(e)) and the Department of Energy's ("DOE") regulations 10 C.F.R. § 205.300, et seq. (2012), hereby files its Renewal Application for authority to transmit electric energy from the United States to Canada. Shell Energy respectfully requests expedited review of this Application and further requests that authorization be granted for an additional term of five years beginning May 6, 2013 in order to avoid any lapse in authority to transmit electricity to Canada.¹ In support of this Application, Shell Energy respectfully states as follows:

**I.
DESCRIPTION OF APPLICANT**

The exact legal name of the Applicant is Shell Energy North America (US), L.P. The Applicant is a limited partnership organized in the State of Delaware with its executive offices and principal place of business in Houston, Texas. Shell Energy is a wholly owned indirect

¹ Shell Energy's current export authorization, EA-339, which was issued on May 5, 2008, expires on May 5, 2013.

subsidiary of Shell Oil Company ("Shell") and Shell is a wholly owned indirect subsidiary of Royal Dutch Shell plc, which is a public limited company incorporated in England and Wales with its principal place of business in The Hague. Shell Energy is authorized by the Federal Energy Regulation Commission ("FERC") to make wholesale sales of energy, capacity, and ancillary services pursuant to a market-based wholesale power sales tariff on file with FERC in Docket No. ER08-656-000. The Applicant does not own any electric generating or transmission facilities, nor does the Applicant have a franchised service area.

II. **COMMUNICATIONS**

Communications regarding this application should be addressed to the following:

Robert Reilley
Vice President, Regulatory Affairs
Shell Energy North America (US), L.P.
1000 Main, Level 12
Houston, TX 77002
(713) 767-5632 (voice)
(713) 265-5632 (fax)
robert.reilley@shell.com

Jane Barnett
Regulatory Adviser
Shell Energy North America (US), L.P.
1000 Main, Level 12
Houston, TX 77002
(713) 767- 5412 (voice)
(713) 265-5412 (fax)
jane.barnett@shell.com

III. **JURISDICTION**

Pursuant to Section 202(e) of the FPA, DOE has jurisdiction over the action to be taken in this Application. Shell Energy does not know of any other federal, state or local government that has jurisdiction over the action to be taken in this Application.

IV. **TECHNICAL DISCUSSION OF PROPOSAL**

Applicant herein seeks authority to transmit electric energy to Canada as a power marketer.² Shell Energy has no "system" of its own on which its exports of power could have a

² As used herein, "power marketer" means an entity that buys and sells electric power for its own account.

reliability or stability impact. The electric energy that Shell Energy will export, on either a firm or interruptible basis, will be surplus to the United States. Shell Energy will purchase the power to be exported from electric utilities, qualifying facilities, and federal power marketing agencies as those terms are defined in sections 3(22), (17), (18), and (19) of the FPA.

Shell Energy proposes to export electric energy through the transmission facilities at the Canadian border with the United States as set forth on Exhibit C. The Presidential Permits under which the relevant border facilities were constructed and are maintained, and details related thereto are also set forth on Exhibit C.

V.

PROCEDURES

The instant Application is consistent with the North America Free Trade Agreement and United States energy policy, and will foster development of a more efficient and competitive North American energy market.

Shell Energy seeks authorization for export transactions through specified border facilities.

Shell Energy will comply with all applicable NERC guidelines in all transactions pursuant to this export authorization.

VI.

EXHIBITS

The following Exhibits are attached hereto:

- Exhibit A (Not applicable).
- Exhibit B Legal Opinion of Shell Energy's counsel.
- Exhibit C Identification and description of transmission facilities to be used.
- Exhibit D (Not applicable.)
- Exhibit E (Not applicable.)

Exhibit F

(Not applicable.)

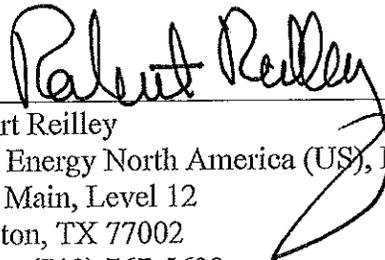
Pursuant to 10 C.F.R. § 205.309, a copy of this Application is being provided to:

Federal Energy Regulatory Commission
Office of the Secretary
888 First Street, N.E.
Washington, DC 20426

CONCLUSION

WHEREFORE, Shell Energy respectfully requests that this Application for renewal of its request for blanket authorization to export electricity from the United States to Canada be expeditiously considered and approved for a term of five years, effective from the date of the order granting this Application.

Respectfully submitted,

By: 

Robert Reilley
Shell Energy North America (US), L.P.
1000 Main, Level 12
Houston, TX 77002
Phone: (713) 767-5632
Fax: (713) 265-5632
Robert.reilley@shell.com

January __, 2013

EXHIBIT A

(NOT APPLICABLE)

EXHIBIT B

OPINION OF COUNSEL

BRACEWELL
& GIULIANI

Texas
New York
Washington, DC
Connecticut
Seattle
Dubai
London

Bracewell & Giuliani LLP
711 Louisiana Street
Suite 2300
Houston, Texas
77002-2770

713.223.2300 Main
713.221.1212 Fax

bgllp.com

January 31, 2013

Mr. Christopher Lawrence
Office of Electricity Delivery and Energy Reliability
Mail Code: OE-20
U.S. Department of Energy
1000 Independence Avenue SW
Washington, D.C. 20585

Re: Application of Shell Energy North America (US), L.P. to Transmit Electric Energy to Canada, Docket No. EA- 339-A

Dear Mr. Lawrence:

Shell Energy North America (US), L.P. (the "Company") is the Applicant in the above-referenced proceeding. As special counsel to the Company for the purpose of providing this letter, we have reviewed the Certificate of Limited Partnership of the Company dated as of September 18, 1995 (as amended on June 3, 1996, June 26, 1997, October 5, 1999, November 24, 1999, December 14, 2000, and October 1, 2007), the Fourth Amended and Restated Limited Partnership Agreement (the "Agreement") of the Company dated as of April 1, 2005 (as amended on September 17, 2007, October 1, 2007, and January 19, 2012), the Certificate of Officer attached hereto as Annex I and such other documents as we have deemed necessary in order to advise you that, as of the date hereof:

- (1) The proposed export of electric energy by the Company to Canada is within the limited partnership powers of the Company; and
- (2) The Company has complied with or will comply with, in each case to the best of our knowledge based solely on the Certificate of Officer attached hereto as Annex I, all pertinent federal and state laws regarding the matters contemplated in the referenced application.

Very truly yours,

Bracewell & Giuliani LLP

Bracewell & Giuliani LLP

CERTIFICATE OF OFFICER

This Certificate of Officer dated as of January 31, 2013 (this "Certificate"), is made by the undersigned officer of Shell Energy North America (US), L.P., a Delaware limited partnership (the "Company"), to Bracewell & Giuliani LLP who are relying on the truth and accuracy of the statements contained herein for the purposes of the opinion to be provided by Bracewell & Giuliani LLP (the "Opinion") in connection with the Application of the Company to Transmit Electric Energy to Canada (Docket No. EA- 339-A) dated as of January 31, 2013 (the "Application").

The undersigned hereby certifies that he is familiar with the facts herein certified and is duly authorized to certify the same. The undersigned hereby certifies to Bracewell & Giuliani LLP the following:

1. I am the Vice President, Regulatory Affairs of the Company, and I have reviewed the Application of the Company, including the Opinion of Bracewell & Giuliani LLP.
2. I have knowledge of the matters set forth in the Application.
3. The Company has complied or will comply with all pertinent federal and state laws regarding the matters contemplated in the referenced Application.

IN WITNESS WHEREOF, the undersigned has executed this Certificate as of the date first above written.

SHELL ENERGY NORTH AMERICA (US),
L.P.

By: _____

Bob Reilley

Vice President, Regulatory Affairs

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

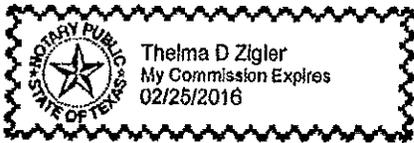
In the Matter of:

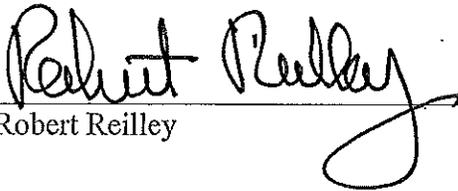
Shell Energy North America (US), L.P.)

Docket No. EA- 339-A

VERIFICATION

I, Robert Reilley, Vice President – Regulatory Affairs of Shell Energy North America (US), L.P., having knowledge of the matters set forth in the above Application of Shell Energy North America (US), L.P. for Authorization to Transmit Electric Energy to Canada, hereby verify that the contents thereof are true and correct to the best of my knowledge and belief.




Robert Reilley

Signed and sworn to before me this 31st day of JANUARY, 2013.

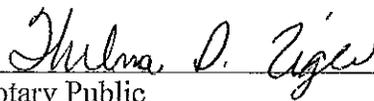

Notary Public

EXHIBIT C

**UNITED STATES ELECTRICAL INTERCONNECTIONS WITH
CANADA**

Present Owner	Location	Voltage	Presidential Permit No. ¹
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
Eastern Maine Electric Cooperative	Calais, ME	69-Kv	PP-32
International Transmission Company	Detroit, MI	230-kV	PP-230
	Marysville, MI	203-kV	PP-230
	St. Claire, MI	230-kV	PP-23-
	St. Claire, MI	345-kV	PP-230
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
	Madawaska, ME	138-kV	PP-29
	Aroostook, ME	2-69-kV	PP-29
Minnesota Power, Inc.	International Falls, MN	115-kV	PP-78
Minnkota Power Cooperative	Roseau County, MN	230-kV	PP-61
Montana Alberta Tie Ltd.	Cut Bank, MT	230-kV	PP-305 ²
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	±450-kV DC	PP-299 ³
Vermont Electric Power Co.	Derby Line, VT	120-kV	PP-66
Vermont Electric Transmission Co.	Norton, VT	±450-kV DC	PP-76

¹ 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.

² These transmission facilities have been authorized but not yet constructed or placed in operation.

³ These transmission facilities have been authorized but not yet constructed or placed in operation.

EXHIBIT D

(NOT APPLICABLE)

EXHIBIT E

(NOT APPLICABLE)

EXHIBIT F

(NOT APPLICABLE)