

by the Federal Energy Regulatory Commission ("FERC") to make wholesale sales of energy, capacity, and ancillary services pursuant to a market-based wholesale power sales tariff on file with the 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
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III. JURISDICTION

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

IV. TECHNICAL DISCUSSION OF PROPOSAL

Applicant herein seeks authorization to transmit electric power to Mexico as a power marketer. Shell Energy has no "system" of its own on which its exports of power could have a reliability or stability impact. The electric power 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 power through the transmission facilities at the Mexican 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 with 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:

- | | | |
|------------------|---|---|
| <u>Exhibit A</u> | - | (Not applicable). |
| <u>Exhibit B</u> | - | Legal Opinion of Shell Energy's counsel. |
| <u>Exhibit C</u> | - | Identification and description of transmission facilities to be used. |
| <u>Exhibit D</u> | - | (Not applicable.) |
| <u>Exhibit E</u> | - | (Not applicable.) |
| <u>Exhibit F</u> | - | (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 the DOE expeditiously consider this Application for renewal of its blanket authorization to export electricity from the United States to Mexico be expeditiously considered and approved for a term of five years, effective from the date of the order granting this Application.

Respectfully submitted,

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

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

Dated: January 31, 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

bglip.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 Mexico, Docket No. EA-338-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 Mexico 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

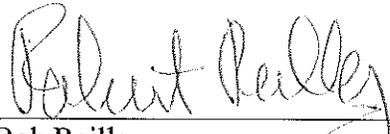
This Certificate of Officer dated as of January 31, 2013 (this "Certificate"), is made by the undersigned officer of Shell Energy North America (US), L.P., a Delaware limited partnership (the "Company"), to Bracewell & Giuliani LLP who are relying on the truth and accuracy of the statements contained 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 Mexico (Docket No. EA-338-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

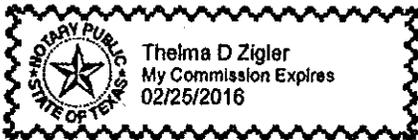
In the Matter of:

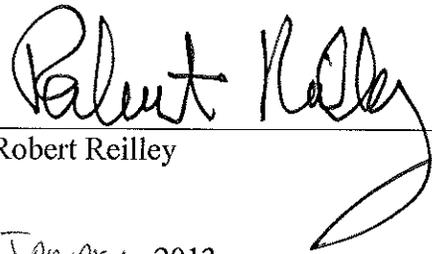
Shell Energy North America (US), L.P.)

Docket No. EA- 338- 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 Mexico, 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

**IDENTIFICATION AND DESCRIPTION OF
TRANSMISSION FACILITIES TO BE USED**

**UNITED STATES INTERCONNECTIONS
WITH MEXICO**

Owner	Location	Voltage	Presidential Permit No.
AEP Texas Central Company	Laredo, TX	138 kV	PP-317
		230 kV	PP-317
	Brownsville, TX	138 kV	PP-94
		69 kV	
	Eagle Pass, TX	138 kV	PP-219
Baja California Power, Inc.	Imperial Valley, CA	230 KV	PP-234
Comision Federal de Electricidad	Falcon Dam, TX	138 kV	N/A
	Redford, TX	7.2 kV	PP-51
	Presidio, TX	13.8 kV	PP-03
El Paso Electric Company	Diablo, NM	115 kV	PP-92
	Ascarate, TX	115 kV	PP-48
Generadora del Desierto – WAPA	San Luis, AZ	230 kV	PP-304
San Diego Gas & Electric	Miguel, CA	230 kV	PP-68
	Imperial Valley, CA	230 kV	PP-79
Sharyland Utilities, Inc.	McAllen, TX	138 kV	PP-285

EXHIBIT D

(NOT APPLICABLE)

EXHIBIT E

(NOT APPLICABLE)

EXHIBIT F
(NOT APPLICABLE)