



United Nations Decade of Sustainable Energy For All (2014-2024)

April 21, 2016

U.S. Department of Energy (FE-34)
Office of Regulation and International Engagement
Office of Fossil Energy

Filed by E-mail: fergas@hq.doe.gov

Re: FE Docket No. 16-22-CGL (81 Fed. Reg. 22585)

I am submitting these comments in my capacity as Technical Coordinator to SIDS DOCK, an international intergovernmental organization (recognized as such by the United Nations), which assists and represents the interests of the world's small island and low lying coastal nations (32 in number) in their efforts to develop sustainable clean energy economies. (My qualifications are outlined in the materials attached as Annex A.)

The small island and coastal nations which SIDS DOCK represents have contributed little to global climate change but face the greatest and most immediate risk from rising sea levels and adverse weather changes associated with that phenomenon. The small island voices were among those widely heard and respected at the recent COP 21 meeting in Paris, and the U.S. and other nations throughout the world made strong commitments to assist our island and coastal nations in meeting the challenges posed by global climate change. SIDS DOCK's comments in response to DOE's recent request for comments on the recently published EIA LNG Export Studies (80 Fed. Reg. 81300), regarding increased exports of natural gas are attached as Annex B.

I have reviewed the SeaOne CGL technology in some detail and have concluded that it offers a highly efficient and cost effective means of transporting low carbon fuel and feedstocks to our countries. There is a critical need for the hydrocarbon mixtures in CGL's custom blends for use as fuels and feedstocks in Caribbean countries. These low carbon high energy natural gas products relative to diesel and heavy fuel oil will provide baseload power to supplement renewable energy in these climatically vulnerable countries as well as provide an essential interim and ancillary source of clean fuel to replace coal and heavy diesel and petroleum fuels during this critical transition period.

Perhaps even more importantly, the inherent flexibility of the CGL process enables custom formulation of a broad range of products which are capable of being utilized with minimal modifications for a broad range of applications which are currently being addressed with heavy diesel, coal, wood char and other dirtier fuels. In terms of volume emission reductions (in some

instances, over 60% in direct generation emissions) the most important of these is transportation. The CGL technology can deliver specialized formulations which are capable of efficient use in fleets which use or can efficiently be converted to use propane, CNG or propane/ngl/natural gas blends.

In light of these facts, the Islands' and low-lying coastal nations' critical needs, and the commitments that the U.S has made, including the Caribbean Energy Security Initiative, to assist the Caribbean Countries in their effort to achieve clean, economic and sustainable energy economies, we believe this application, like similar applications filed by FTA countries, is presumed to be "in the public interest" and granted "as soon as possible."

Requests by SeaOne's and other private sector actors seeking long-term authorization to export high energy natural gas products contained in Compressed Gas Liquid will provide the vulnerable Island and Coastal nations, which SIDS DOCK represents, with an assured source of custom fuel blends which can be used in existing facilities, vessels and vehicles with minimal modifications and which can be delivered in shallow draft vessels to lower-cost reception facilities. We respectfully recommend such requests be urgently granted, as it will significantly influence the energy sector transformation in Islands.

Please feel free to call on us if further information on this subject is needed. Your careful consideration of these comments is greatly appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "Al Binger". The signature is fluid and cursive, with a large initial "A" and "B".

Albert Binger PhD
SIDS DOCK Coordinator

Annex A

Albert Binger

44 Farwell Avenue, Kingston 19, Jamaica, W.I. || 876-925-5086; 301-873-4522 || yengar@hotmail.com; abinger@sidsdock.org

ACADEMIC BACKGROUND:

1976- 1980: PhD Soil Chemistry, University of Georgia, Athens, Georgia, USA

1974-1975: Post-Graduate Studies Biophysics, University of California, Los Angeles, USA

1972-1974: B.Sc. Chemical Engineering, University of California, Los Angeles

PROFESSIONAL EXPERIENCE:

SMALL ISLAND DEVELOPING STATES (SIDS) SUSTAINABLE ENERGY AND CLIMATE RESILIENCE ORGANIZATION – SIDS DOCK, *The SIDS DOCK organization was developed to provide the small island developing states with a mechanism that collectively advances the transformation of the energy sector in SIDS from petroleum fuels dominated to renewable sources in order to help generate financial resources to address climate change adaptation.*

SIDS DOCK Coordinator & Project Manager, 2011 – Present

Helped create the organisation in 2007. Responsible for the development of the organization and the strategic planning for mobilizing an estimated USD 20 billion in investments for SIDS, over the next two decades. Developed USD 3.2 Billion, Indicative Project Pipeline for sustainable energy projects at various stages of development, which is first for SIDS. Organization is called SIDS DOCK because it is designed as a “docking station”, connecting Island Nations, as well as with the United States (US), European Union (EU), and other countries with technology, capital and carbon markets. SIDS DOCK is projected to assist Island Nations to generate at least 50 per cent of electric power from renewable sources, decrease petroleum use by 25 per cent, and increase energy efficiency by 25 per cent (using a 2005 baseline), by 2033.

CARIBBEAN COMMUNITY CLIMATE CHANGE CENTRE (5Cs), BELMOPAN, BELIZE, *The 5Cs major focus is on building national and regional capacity to address the evolving threat of climate change. It is a technical organization of the Caribbean Community (CARICOM), with oversight from a Board of Directors and reports to the CARICOM Committee on Trade and Economic Development (COTED)*

Senior Energy Advisor, 2007- Present

Responsible for assisting the Centre with sustainable energy project planning, capacity building, resource mobilization, and international negotiations. Responsible for climate change and energy issues; developing capacity in the region to address adaptation to climate change; developing renewable energy resources, and promotion of energy efficiency projects to reduce emissions of greenhouse gases and lessen the dependence of the region on imported petroleum fuels.

ALLIANCE OF SMALL ISLAND STATES (AOSIS), New York City, NY, *AOSIS is a coalition of small islands and low-lying coastal countries that share similar development challenges and concerns about the environment, especially their vulnerability to the adverse effects of global climate change. It functions primarily as an ad hoc lobby and negotiating voice for Small Island Developing States (SIDS) within the UN system particularly at the UNFCCC Conference of the Parties(COP)*

Science Advisor & Technical Coordinator, 2009 – 2012

Duties: Enhanced coordination among States participating in the AOSIS in relation to international negotiations on Climate Change and related issues, with a view to strengthening the negotiation position and ability of AOSIS in such negotiations. Coordinated the development of the Island Nations UNFCCC negotiating position of **1.5 To Stay Alive!**, and the communications campaign on global climate change,

sponsored by the World Wide Fund for Nature, intended to prompt climate change negotiators to achieve a global agreement on a GHG concentration of 350 ppm or below, at or before COP 15, in Copenhagen, Denmark, in December 2009 – the campaign reached over 200 million worldwide – unprecedented for the SIDS at the time.

INTER-AMERICAN INSTITUTE FOR COOPERATION ON AGRICULTURE (IICA), SAN JOSE, COSTA RICA, *IICA is the specialized agency for agriculture of the Inter-American system, linked to the Organization of American States (OAS)*

Consultant on Biofuels, 2006 - Present

Developed the first *Strategy for the Development of an Agro-Energy Program for the Caribbean Region*; successfully coordinated a High-Level Regional Biofuels Seminar, in Georgetown, Guyana, in 2007, the first of its kind.

UNITED NATIONS DEVELOPMENT PROGRAMME (UNDP), BARBADOS OFFICE, BRIDGETOWN, BARBADOS, *UNDP is the UN's global development network, an organization advocating for change and connecting countries to knowledge, experience and resources to help people build a better life*

Consultant, Renewable Energy and Sustainable Development, 2005

Developed a National Energy Strategy for St. Kitts and Nevis, including the diversification of the sugar industry

UNITED NATIONS DEVELOPMENT PROGRAMME (UNDP), BUREAU FOR DEVELOPMENT POLICY, (UNDP/BDP), NEW YORK CITY, NY, *UNDP's primary policy bureau; it helps set corporate standards and promotes a coherent approach to development for the benefit of the UN system and national partners. As UNDP's development think tank, BDP plays an important role helping to inform and influence the global policy debate.*

Consultant/Coordinator, Planning the UNDP Participation in the 2nd United Nations International conference on Sustainable Development in Small Islands Developing States , Mauritius, January 2005

The feature was a technology fair that displayed a range of technologies for the extraction and purification of water from saline or biologically contaminated sources, to the application of direct solar for drying heating and cooling. The Fair ran for four days and visitors included the United Nations Secretary General

SAGA UNIVERSITY, SAGA, JAPAN, Saga, University is the foremost university in the world in the area of ocean energy research specializing in thermal conversion at its Institute for Ocean Energy Studies.

Visiting Professor, 2003-Present

Researcher on Ocean Thermal Energy Conversion (OTEC) Systems

UNITED NATIONS DEVELOPMENT PROGRAMME/BUREAU OF DEVELOPMENT POLICY (UNDP/BDP), NEW YORK CITY, NY,

Consultant/Coordinator, Capacity Development Group, 2000-2004

- Team Leader for Capacity 21 Evaluation;
- Developed the Capacity 2015 Program;
- Team Leader, UNDP SIDS Experts Group

UNIVERSITY OF THE WEST INDIES CENTRE FOR ENVIRONMENT AND DEVELOPMENT (UWICED), MONA CAMPUS, JAMAICA, W.I., *UWICED was the premier Centre that provided a regional focal point for facilitating research and training in sustainable development in the Caribbean Region*

Professor and Director, 1997-2005

Coordination of research, training and information related to developing capacity on environment and development issues affecting small island developing states and functioned as the regional focal point in the Caribbean for promoting technology-led entrepreneurial development programs

ROCKEFELLER FOUNDATION, NEW YORK, USA, *the Foundation is a science based organization that supports work that enables individuals, communities, and institutions to access new tools, practices, resources, services, and products. The Foundation supports work that enhances their resilience in the face of acute crises and chronic stresses, whether manmade, ecological, or both*

Chair, Strategic Planning, Global Environment Division, 1997-1999

Directed the planning processes for the development of the Foundation's activities in global energy and environment protection and management

Director, Global Environment Division, 1991-1997

Responsible for planning and development in the field of environment and energy; provided advice to the President and Board of Trustees on options for new program initiatives and direction; developed the Leadership for Environment and Development program (LEAD). LEAD operates in Brazil, China, Canada, the Commonwealth of Independent States, India, Indonesia, Japan, Mexico, Nigeria, Pakistan and Southern Africa. Also established the Renewable and Energy Efficiency not-for-profit organization, E&Co, Montclair, NJ

Senior Program Officer, Global Environment Division, 1990-1991

Evaluated proposals, managed grants and developed programs in energy and environment with a particular focus on renewable energy sources

BIOMASS USERS NETWORK (BUN), COSTA RICA, *BUN is an inter-governmental organization established by and for developing countries to promote South-South cooperation in strengthening national capabilities to plan and implement more sustainable natural resource development programs especially fuel and feed from Biomass resources*

Founding President, 1984-1990

Responsible for the planning and development of the organization

AGRICULTURAL DEVELOPMENT PROGRAM (AGRO-21), OFFICE OF THE PRIME MINISTER, JAMAICA, W.I., *Agro-21 was established to spearhead the new agriculture policies, with the objectives of putting idle land into the hands of the private sector and with increasing growth in the production and export of nontraditional crops and Jamaican ethnic crops*

Director, 1984-1985

Identified and promoted opportunities for private and public investment in non-food agriculture, primarily biofuel production to replace imported petroleum; conceived, coordinated and presented with USAID, the feasibility study for production of electricity from sugarcane processing by-products (bagasse). Project designed to stabilize the economic base of the sugar industry's viability, critical to Jamaica's economic and ecological future

SCIENTIFIC RESEARCH COUNCIL (SRC), JAMAICA, W.I., *SRC is Jamaica's principal public sector agency responsible for the fostering and coordination of scientific research and the promotion of its application*

Director, Research and Development, 1980-1984

Formulated research and development programs and operations budget; programs focused on the sustainable utilization of both renewable and non-renewable natural resources. Appointed by the Prime Minister as SRC's representative on the AGRO-21 Steering Committee

SIGNIFICANT PUBLICATIONS:

- *Strategy for the Development of an Agro-Energy Program for the Caribbean Region*, Inter-American Institute for Cooperation on Agriculture (IICA) (2006), San Jose, Costa Rica.
- *Vulnerability and Small Island States*, United Nations Development Programme (UNDP) Policy Journal, Vol. 1 (2002). United Nations Development Program, New York.
- *Capacity Development Initiative – Country Capacity Development Needs, Report of Small Island Developing States*, 2000, UNDP-GEF

SPECIAL INTERESTS:

- Member, Board of Directors
International Bioenergy Association, Stockholm, Sweden

- Member, Representative of the Alliance of Small Island States (AOSIS) United Nations Framework Convention on Climate Change (UNFCCC) Technology Executive Committee UNFCC Secretariat, Bonn, Germany
- Member, United Nations Secretary-General *Sustainable Energy For All Initiative* 2012 United Nations Headquarters, New York, USA

Annex B

February 12, 2016

Heads of State Council

The Hon. Dr. Ralph Everard Gonsalves
Prime Minister
Saint Vincent and the Grenadines

The Hon. Henry Tuakeu Puna
Prime Minister
Cook Islands

The Right Hon. Dr. Keith Mitchell
Prime Minister
Grenada

U.S. Department of Energy (FE-34)
Office of Regulation and International
Engagement, Office of Fossil Energy
P.O. Box 44375
Washington, DC 20026-4375

Re: Request for Comments - 2014 EIA LNG Export Study and 2015 LNG Export Study (80 Fed. Reg. 81300)

These comments are submitted on behalf of SIDS DOCK, an international intergovernmental organization (recognized as such by the United Nations), which assists and represents the interests of the world's small islands and low lying coastal nations (32 in number) in their efforts to develop sustainable clean energy economies. We appreciate the opportunity to submit comments on this important issue because our members are among the world's nations that will be most directly affected by the U.S. Department of Energy's decisions on this issue.

SIDS DOCK's genesis, purposes and mission are discussed in some detail on the organization's website: www.sidsdock.org and, in particular, in the linked video: <http://sidsdock.org/what-is-sids-dock> prepared at the time of the U.N. inaugural ceremony recognizing SIDS DOCK as a U.N. cooperating agency.

As the Department of Energy ("DOE") should be aware, the small islands and coastal nations which SIDS DOCK represents have contributed little to global climate change, but face the greatest and most immediate risk from rising sea levels and adverse weather changes associated with that phenomenon. As DOE may also be aware, the small island voices were among those widely heard and respected at the recent COP 21 meeting in Paris, and the U.S. and other nations throughout the world made strong commitments to assist our islands and coastal nations in meeting the challenges posed by global climate change.

While SIDS DOCK has limited expertise in addressing the narrow economic issues addressed in the subject study, we do believe that the credentials outlined above give us a special standing to address the way in which narrow economic studies such as this are being used to determine the "public interests" of a great nation, to appeal to the Agency's conscience and to encourage the Agency to look outward, as well as inward, in determining where the U.S.' "public interest" lies.

Founders

Alliance of Small Island States
Caribbean Community
Climate Change Centre
Secretariat of the Pacific Regional
Environment Programme



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First, we should make clear that while SIDS DOCK's long term objectives emphasize the need for clean, sustainable, renewable energy and eventual elimination of reliance on fossil fuels, we also recognize that, at least in the near- and medium-term, access to natural gas and natural gas related products will be an essential part of our islands' plans for clean and sustainable energy economies. Our current dependence on coal, heavy diesel and similar fossil fuel products both for power generation and transportation uses must be diminished. Natural gas products are the most likely candidates for accomplishing this objective in the near term.

President Obama has recognized our critical need to transition to cleaner and more economic energy sources: <http://go.wh.gov/ZmANS2>.

Vice President Biden has recognized that natural gas is an important resource for this transition: <https://www.whitehouse.gov/the-press-office/2015/01/26/remarks-vice-president-biden-caribbean-energy-security-initiative>.

Secretary Moniz has as well: http://www.jamaicaobserver.com/news/Jamaica--US-sign-energy-cooperation-agreement_18724881.

The U.S. has entered into agreements and understandings with islands in the Caribbean which contemplate a role for natural gas products in the Caribbean Energy Security Initiative, announced by the President last April, and discussions are being held regarding similar understandings for territories and island nations in the Pacific.

In light of all of these commitments and discussions and the U.S. Administration's strong commitment to reduction of the threats posed by climate change, it seems inappropriate for the U.S. Department of Energy to base "public interest" determinations on the parsing of economic details to determine whether any U.S. industry segment might suffer adverse impacts. At a time when the U.S. allows unlimited exports of coal, bitumen and crude oil; and when so many of the studies suggest that impacts of exports on U.S. industries might be marginal, at most, this is, in our view, a shortsighted policy which is directly contrary to commitments that the U.S. has made and in the long run, to the U.S.' public interest.

SIDS DOCK respectfully requests that DOE revise its approach to public interest determinations. We believe that international comity and the commitments and understandings discussed above call for a determination that U.S.' natural gas will be made available, at least to your nation's friends and allies, on a fair and non-discriminatory basis. This is particularly true with respect to our island nations which the U.S. has unequivocally stated to be its friends and allies and whose transition to clean, economic, sustainable economies to be definitely in the U.S. public interest. There is no reason to differentiate between those nations which SIDS DOCK represents which have not yet entered into Free Trade Agreements and those which have. All of our member nations should be viewed as the U.S.' close partners in the effort to reduce and mitigate carbon emissions and treated as such with respect to access to clean energy resources such as natural gas and technologies such as wind, solar and geothermal.

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While we fully support regulation of production to minimize the release of greenhouse gases, export regulation should not be a substitute for such regulation. From our perspective, the restriction of natural gas exports to our islands and low lying coastal nations discriminates against these nations *vis a vis* U.S. and FTA nation users and, perhaps more importantly, will simply encourage continued reliance on coal, heavy diesel, bitumen and other dirtier fuels. We urgently seek policy changes to avoid that eventuality.

Please feel free to call on us if further information on this subject is needed. Your careful consideration of these comments is greatly appreciated.

Please accept the assurances of my highest consideration.

Sincerely,



H.E. Dr. Vince Henderson
Ambassador Plenipotentiary and Permanent
Representative of the Commonwealth of Dominica
to the United Nations
Chair, SIDS DOCK Steering Committee