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**UNITED STATES OF AMERICA
BEFORE THE DEPARTMENT OF ENERGY
OFFICE OF FOSSIL ENERGY**

In the Matter of)
) **FE Docket No. 16-205-LNG**
DOMINION COVE POINT LNG, LP)

**ANSWER OF DOMINION COVE POINT LNG, LP
OPPOSING SIERRA CLUB PROTEST AND
REQUESTING PROMPT ISSUANCE OF BLANKET AUTHORIZATION**

Pursuant to Sections 509.302(b) and 590.304(f) of the Department of Energy’s regulations, ^{1/} Dominion Cove Point LNG, LP (DCP) hereby answers the Sierra Club’s Motion to Intervene and Protest filed in the above-captioned proceeding on May 12, 2017. DCP also respectfully urges the Department of Energy, Office of Fossil Energy (DOE/FE) to issue as soon as possible the requested short-term, blanket authorization for the export the “Commissioning Volumes” of liquefied natural gas (LNG) commencing on the date of the initial export from the Cove Point Terminal.

Sierra Club states in its protest that it opposes DCP’s application here for the same reasons that it has consistently opposed LNG exports by DCP to “non-free trade agreement” countries, as set forth in its filings in DOE/FE Docket No. 11-115-LNG and the subsequent appeal pending in D.C. Circuit No. 16-1186. Sierra Club has not raised any new arguments here, and DOE/FE has already rejected its old arguments. The fact that the Sierra Club has appealed the DOE/FE’s decisions, of course, is no basis for DOE/FE to change course.

Furthermore, granting DCP’s requested blanket authorization for the Commissioning Volumes is unquestionably consistent with the public interest and warranted under established DOE precedent. The requested volume of exports here are less than the volume that DOE/FE found to be consistent with the public interest in DOE/FE Order Nos. 3331 and 3331-A. The export of the Commissioning Volumes will not result in any new construction and, thus, is categorically excluded from review pursuant to the

^{1/} 10 C.F.R. 509.302(b) and 590.304(f) (2017).

National Environmental Policy Act. And DOE/FE has concluded that no additional public interest review is warranted and issued blanket authorization for commissioning volumes in comparable circumstances for other projects.^{2/}

DCP filed its application for this blanket authorization over six months ago. In the application, DCP explained that, as of the end of October, 2016, engineering and procurement for the Terminal portion of the Liquefaction Project was essentially complete and construction was over 60% complete. As of the end of May, 2017, construction is now approximately 89% complete.^{3/} The date of initial exports of LNG from Cove Point is fast approaching.

Therefore, DCP respectfully urges DOE/FE to grant the authorization requested in this proceeding without further delay.

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Respectfully submitted,

/s/ J. Patrick Nevins
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Dominion Cove Point LNG, LP

Dated: May 26, 2017

^{2/} *Sabine Pass Liquefaction, LLC*, Order No. 3767 at page 10 (Jan. 13, 2016); *Cameron LNG, LLC*, DOE/FE Order No. 3904 at pages 8-9 (Oct. 3, 2016).

^{3/} As noted in its application for blanket authorization, DCP is required to submit monthly status and progress reports to FERC. The completion status set forth above was provided in DCP's Monthly Status Report filed in FERC Docket No. CP13-113 on May 18, 2017. FERC Accession No. 20170518-5067.

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**CERTIFICATED STATEMENT
OF AUTHORIZED REPRESENTATIVE**

I HEREBY CERTIFY, in accordance with the requirements of 10 C.F.R. Section 590.103(b) (2017), that I am a duly authorized representative of Dominion Cove Point LNG, LP, and that I am authorized to sign and file with the Office of Fossil Energy of the Department of Energy, on behalf of Dominion Cove Point LNG, LP, the foregoing document in the above-captioned proceeding.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing document upon the parties in this proceeding in accordance with the requirements of 10 C.F.R. Section 590.107 (2017), as well as on counsel for the Sierra Club Environmental Law Program.

Dated at Washington, D.C., this 26th day of May, 2017.

/s/ J. Patrick Nevins
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