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

Port Arthur LNG, LLC

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FE Docket No. 15-96-LNG

**ANSWER OF PORT ARTHUR LNG, LLC IN OPPOSITION TO
NOTICE OF INTERVENTION, PROTEST AND COMMENT
OF INDUSTRIAL ENERGY CONSUMERS OF AMERICA**

Pursuant to Sections 590.303(e) and 590.304(f) of the Department of Energy's ("DOE") regulations,¹ Port Arthur LNG, LLC ("Port Arthur LNG" or "PALNG") hereby submits this Answer to the Industrial Energy Consumers of America's ("IECA") Notice of Intervention, Protest and Comment submitted to the DOE Office of Fossil Energy ("DOE/FE") on April 11, 2019 in the above-captioned proceeding. For the reasons discussed below, PALNG respectfully requests that the DOE/FE deny IECA's intervention and protest and disregard its comments. In support of this Answer, PALNG states as follows:

I. BACKGROUND

On June 15, 2015, PALNG filed in FE Docket No. 15-96-LNG an application for long-term, multi-contract authorization to export 517 billion cubic feet per year ("Bcf/yr") of domestically produced liquefied natural gas ("LNG") to any country (i) with which the United States does not have a Free Trade Agreement ("FTA") requiring the national treatment for trade in natural gas, (ii) which has or will develop the capacity to import LNG delivered by ocean-going carrier, and (iii) with which trade is not prohibited by United States law or policy (the "Non-FTA Application"). On August 26, 2015, DOE/FE published a Notice of Application in the Federal

¹ 10 C.F.R. §§ 590.303(e) & 590.304(f) (2019).

Register, setting a deadline of October 26, 2015 for protests, interventions, and comments to the Non-FTA Application. IECA did not intervene in Docket No. FE 15-96-LNG or file comments or protests to the Non-FTA Application at that time.

On October 18, 2018, PALNG filed an amendment to the Non-FTA Application, seeking to increase the volumes requested in the Non-FTA Application by 181 Bcf/yr, for a total requested volume of up to 698 Bcf/yr (“Amendment” or “Design Increase”). The purpose of the Design Increase is to align the volumes requested under the Non-FTA Application with the maximum capacity at optimal conditions of PALNG’s proposed liquefaction and export facilities in Port Arthur, Texas, as set forth in PALNG’s application filed with the Federal Energy Regulatory Commission (“FERC”) in Docket No. CP17-20-000, which FERC approved on April 18, 2019. DOE/FE published a Notice of Amendment in the Federal Register, setting a deadline of April 11, 2019 for interventions, protests, and comments.² In the Notice of Amendment, DOE/FE specified that “[b]ecause the public previously was given the opportunity to intervene in, protest, and comment on Port Arthur LNG’s pending Application, DOE/FE may disregard comments or protests that do not bear directly on the Amendment—specifically, Port Arthur LNG’s proposed increase of its requested non-FTA export volume.”³

IECA filed its Notice of Intervention, Protest and Comment on April 11, 2019 (the “IECA Pleading”). Rather than limiting its protest to the Design Increase, the IECA Pleading challenges all exports requested in PALNG’s Non-FTA Application, as amended by the Design Increase application.

² *Port Arthur LNG, LLC: Application to Amend Application for Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations*, Notice of Amendment, 84 Fed. Reg. 10808 (2019).

³ *Id.* at 10809.

II. ANSWER

A. *IECA's Intervention Fails to Set Out IECA's Interest in the Proceeding*

As an initial matter, IECA fails to meet even the most basic requirements for an intervention under DOE's rules. IECA requests to intervene pursuant to section 590.303(b) of DOE's regulations. Section 590.303(b) requires that "[a]ny . . . person who seeks to become a party to the proceeding shall file a motion to intervene, which sets out clearly and concisely the facts upon which the petitioner's claim of interest is based."⁴

Nowhere does IECA explain its interest in the proceeding, let alone clearly set out the facts on which IECA's claim of interest is based. Therefore, IECA has failed to satisfy the basic requirements for a motion to intervene under DOE's regulations, and its request to intervene in this proceeding should be denied.

B. *The IECA Pleading is Effectively a Late-Filed Motion to Intervene that Fails to Show the Requisite Good Cause*

The IECA Pleading does not directly address the Design Increase. Instead, IECA protests all exports related to the Non-FTA Application as amended by the Design Increase application. However, as noted above, IECA failed to intervene in this proceeding or to protest PALNG's proposed exports when DOE/FE initially published notice of the Non-FTA Application in 2015. Through the IECA Pleading, IECA is using the DOE/FE's Notice of Amendment as a backdoor attempt to attack PALNG's Non-FTA Application rather than limiting its protest and comments to the Design Increase. In this regard, the IECA Pleading is effectively a late-filed motion to

⁴ 10 C.F.R. 590.303(b).

intervene that has been filed almost three and one-half years after the close of the intervention period for the Non-FTA Application.

Under DOE's rules, "[m]otions to intervene may be filed . . . no later than the date fixed for filing such motions or notices in the applicable FE notice or order, unless a later date is permitted by the Assistant Secretary for good cause shown and after considering the impact of granting the late motion of the proceeding."⁵

IECA does not acknowledge that its intervention, as it relates to the Non-FTA Application, is late-filed; much less does it provide an explanation or otherwise show good cause for its late filing. Moreover, granting IECA's intervention at this late stage of the proceeding would have a prejudicial impact on PALNG.⁶ Under similar circumstances, DOE has rejected IECA's attempts belatedly to intervene and protest an underlying export application during the comment period for an amendment to that application.⁷ DOE/FE should do the same here.

C. *DOE/FE Should Disregard IECA's Protest and Comments Because They Are Not Limited to the Design Increase*

Separately, as noted above, DOE's Notice of Amendment for the Design Increase explicitly stated that "[b]ecause the public previously was given the opportunity to intervene in, protest, and comment on Port Arthur LNG's pending Application, DOE/FE may disregard comments or

⁵ 10 C.F.R. § 590.303(d).

⁶ The Final Environmental Impact Statement for PALNG's proposed export and liquefaction facilities, of which DOE was a cooperating agency, was released on January 31, 2019. The 90-day Federal Authorization Decision Deadline falls on May 1, 2019. On April 18, 2019, FERC approved Port Arthur's section 3 application.

⁷ See *Driftwood LNG LLC*, Order Dismissing Industrial Energy Consumers of America's Motion to Intervene and Protest and Accepting Late-Filed Comments, FE Docket No. 16-44-LNG (Apr. 10, 2019) ("[W]e note that IECA's Pleading does not challenge the Supplement but contains comments and a protest aimed at Driftwood LNG's underlying Application (and at U.S. LNG exports generally). If DOE/FE were to grant IECA's request to intervene and accept the protest contained in the Pleading, DOE/FE would be permitting an intervention and protest challenging the Application filed approximately one year and nine months after the due date for such filings established in the Notice of Application. IECA has offered no good cause for permitting such a result.").

protests that do not bear directly on the Amendment—specifically, Port Arthur LNG’s proposed increase of its requested non-FTA export volume.”⁸ The IECA Pleading does not bear directly on PALNG’s proposed 181 Bcf/yr Design Increase, but instead is a late-filed attempt to protest the Non-FTA Application and exports of domestically-produced LNG more generally. Because the IECA Pleading does not provide any factual information or legal arguments relating to the Design Increase, DOE/FE should reject IECA’s protest and disregard its comments.

D. *IECA Mischaracterizes the Public Interest Standard and Fails to Meet its Burden to Show the Proposed Exports are Inconsistent with the Public Interest*

IECA claims that the Non-FTA Application should be denied because DOE/FE and PALNG have not demonstrated that the proposed exports are consistent with the public interest. IECA also argues that DOE/FE inappropriately relies on the factors enumerated in the 1984 Policy Guidelines in its public interest review and should conduct a rulemaking to define “public interest” as it relates to LNG exports to Non-FTA countries.

As a preliminary matter, IECA entirely misconstrues and misapplies the public interest standard applicable to LNG exports to Non-FTA nations. DOE/FE reviews applications to export LNG from the United States to Non-FTA nations under section 3(a) of the Natural Gas Act (“NGA”), which provides:

[N]o person shall export any natural gas from the United States to a foreign country or import any natural gas from a foreign country without first having secured an order of the Commission authorizing it to do so. *The Commission shall issue such order upon application, unless, after opportunity for hearing, it finds that the proposed exportation or importation will not be consistent with the public interest.*⁹

⁸ 84 Fed. Reg. at 10809.

⁹ 15 U.S.C. § 717b(a) (emphasis added).

This provision creates a rebuttable presumption that a proposed export is in the public interest.¹⁰ DOE/FE has explained that it must grant an export application unless opponents of the application overcome the “presumption favoring export authorizations” by making an affirmative showing that the application is inconsistent with the public interest.¹¹ Contrary to IECA’s claims, the burden is on IECA to make an affirmative showing that the exports are inconsistent with the public interest, which as explained below, the IECA Pleading fails to do.

IECA’s claims that DOE/FE does not properly define or apply the public interest standard are equally unavailing. According to IECA, the 1984 Policy Guidelines were developed with respect to LNG imports and therefore should not be relied on when examining proposed exports. Indeed, IECA makes several assertions about Congress’s intent with respect to approval of non-FTA exports, completely free of factual, precedential, or logical support.¹² To bolster its unsupported claims about the interpretation of the “public interest” standard under NGA Section 3, IECA cites a wholly irrelevant statement by the Attorney General, which IECA then purports, without context or explanation, to represent the appropriate application of DOE/FE’s discretion in proceedings under the NGA.¹³ IECA’s bare citation to a statement from the head of another agency

¹⁰ See, e.g. *Sierra Club v. U.S. Dep’t of Energy*, 867 F.3d 189, 203 (D.C. Cir. 2017).

¹¹ *Phillips Alaska Nat. Gas Corp. & Marathon Oil Co.*, DOE/FE Order No. 1473, FE Docket No. 96-99-LNG, Order Extending Authorization to Export Liquefied Natural Gas from Alaska, at 13 n.42 (Apr. 2, 1999) (citing *Panhandle Producers & Royalty Owners Ass’n v. ERA*, 822 F.2d 1105, 1111 (D.C. Cir. 1987)); see also *West Virginia Public Services Com. v. United States Dep’t of Energy*, 681 F.2d 847, 856 (D.C. Cir. 1982) (“Section 3 therefore differs significantly from other sections under the NGA which condition agency approval upon a positive finding that the proposed activity will be in the public interest.”).

¹² IECA Pleading at 4.

¹³ Indeed, the IECA Pleading even fails to demonstrate that the Attorney General’s statement actually supports the position IECA has taken with respect to the “public interest” standard or how its proposed interpretation would be implemented. In contrast to the unworkably broad meaning that IECA would ascribe to the term “public interest,” the Supreme Court case cited in IECA’s own pleading stands for precisely the opposite result. See *NAACP v. FPC*, 425 U.S. 662, 669 (1976) (“[T]he use of the words ‘public interest’ in a regulatory statute is not a broad license to promote the general public welfare. Rather, the words take meaning from the purposes of the regulatory legislation.”).

with no bearing whatever on the regulatory issues in this proceeding and its non-sequitur claims regarding its preferred interpretation of the “public interest” standard completely ignore the basic tenet that DOE must be accorded deference when it is interpreting a statute it is charged with administering.¹⁴ Along these lines, DOE/FE has already upheld its public interest review—including its reliance on the 1984 Policy Guidelines—against prior IECA challenge, noting:

NGA section 3(a) requires DOE to find that a proposed export of natural gas will be consistent with the public interest. A public interest standard in a statute is understood to be an “instrument for the exercise of discretion by the expert body which Congress has charged to carry out its legislative policy.” Accordingly, in prior proceedings, DOE/FE has identified a range of factors that it considers in evaluating the public interest. . . . DOE/FE previously determined that the goals of the 1984 Policy Guidelines—to minimize federal control and involvement in energy markets and to promote a balanced and mixed energy resource system—apply to exports of natural gas, as well as imports. In *Sierra Club I and II*, the D.C. Circuit upheld DOE/FE’s decision-making on the basis of this statutory and regulatory framework.¹⁵

DOE/FE should once again reject IECA’s claims that inaccurately represent the required public interest review.

E. *IECA’s Protest and Comments to the Proceeding Consist of Inaccurate and Unsupported Statements That Do Not Add to the Record in this Proceeding and Should be Rejected*

IECA’s challenge to the Non-FTA Application and U.S. LNG exports generally is based on a variety of inaccurate and factually unsupported assertions, some of which have already been dismissed by DOE/FE. Because the IECA Pleading fails to provide any factually supported

¹⁴ See *Chevron, U.S.A., Inc. v. NRDC*, 467 U.S. 837 (1984) (“In reviewing an agency’s interpretation of a federal statute, the judicial courts must give deference to express congressional intent when Congress delegated an executive agency with the authority to administer its statutory scheme.”)

¹⁵ *Venture Global Calcasieu Pass, LLC*, DOE/FE Order No. 4346, FE Docket Nos. 13-69-LNG, 14-88-LNG & 15-25-LNG, Opinion and Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations at 53-54 (Mar. 5, 2019) (citing *Sierra Club v. FERC*, 867 F.3d 189 at 193-94, 203 (D.C. Cir. 2017)).

information that may serve to develop the record in this proceeding, DOE/FE should reject IECA's protest and disregard its comments.

1. *IECA's Claim that Only Producers and Exporters of Natural Gas Benefit from Increased LNG Exports is Inaccurate and Contradicted by DOE/FE's LNG Export Studies*

The IECA Pleading, without citation or context, selectively includes a figure that appears to be taken from the 2012 study on Macroeconomic Impacts of LNG Exports from the United States ("2012 Study"). According to IECA, this figure purportedly shows that "the only entities that benefit from LNG exports are producers and exporters of natural gas. Everyone else is negatively impacted."¹⁶

IECA's assertion is directly undermined by DOE/FE's 2018 study on Macroeconomic Outcomes of Market Determined Levels of U.S. LNG Exports ("2018 Study"). Indeed, the 2018 Study pointed out that increased LNG exports will have only a negligible effect on the growth rate in the chemicals, iron and steel, and other energy-intensive sectors.¹⁷ In light of these findings, DOE/FE rejected identical arguments in its response to IECA's comments on the 2018 Study. DOE/FE explained it was "not persuaded by IECA's claim that DOE's approval of LNG will put trillions of dollars of jobs at risk, among other alleged negative impacts. With respect to the argument that some industries derive greater economic value from natural gas than others,

¹⁶ See IECA Pleading at 5. What IECA neglects to mention is that the 2012 Study nevertheless concluded that "[i]n no scenario are energy-intensive industries as a whole projected to have a loss in employment or output greater than 1% in any year, which is less than normal rates of turnover of employees in the relevant industries," and furthermore that, "even with unlimited exports, there would be net economic benefits to the U.S. . . . and the benefits become larger, the higher the level of exports." See *Macroeconomic Impacts of LNG Exports from the United States*, NERA Economic Consulting at 12 (Dec. 3, 2012). These benefits include improved consumer well-being across all export scenarios analyzed. *Id.* at 76.

¹⁷ See *Macroeconomic Outcomes of Market Determined Levels of U.S. LNG Exports*, NERA Economic Consulting at 70 (June 7, 2018). For example, under the Reference Case, annual growth in the chemicals sector is 2.59%. The highest natural gas demand scenario reduces this annual growth rate only to 2.58%. The 2018 NERA Study explains that "[t]he variation in the growth rates attributable to differences in LNG exports ranges from one to seven basis points (0.01% to 0.07%)." *Id.*

DOE/FE continues to be guided by the long-standing principle . . . that resource allocation decisions of this nature are better left to the market, rather than to DOE, to resolve.”¹⁸ Ultimately, the 2018 NERA Study concluded that increased LNG exports result in overall positive benefits, such as rising U.S. consumer well-being and total gross domestic product (“GDP”).¹⁹ Thus, current studies find that the United States, as a whole, will prosper with additional LNG exports. DOE/FE should accordingly dismiss this argument.

2. *IECA’s Claim that Increased Exports of U.S. LNG Will Lead to Price Convergence with Global Markets is Baseless*

IECA makes several unfounded arguments alleging the perils of “using markets” to determine levels of LNG exports. Essentially, IECA contends that as LNG exports rise, the comparatively low domestic price of natural gas will become linked to higher global natural gas prices, resulting in rising domestic prices that harm U.S. consumers.²⁰ DOE/FE has consistently dismissed this claim, explaining that “[w]hile exports to a market where higher prices prevail may yield a price advantage to the exporter or seller in that international market, IECA . . . [has] not explained why or how the export activity would cause the international price to be adopted within the well-supplied domestic natural gas market. . . . Given the magnitude of domestic resources, we find that the proposed export activity is unlikely to alter the pricing mechanism for domestic natural gas.”²¹

¹⁸ *Study on Macroeconomic Outcomes of LNG Exports: Response to Comments Received on Study*, 83 Fed. Reg. 67251, 67265 (Dec. 28, 2018).

¹⁹ 2018 Study at 65-68.

²⁰ IECA Pleading at 2, 6.

²¹ *Sabine Pass Liquefaction, LLC*, DOE/FE Order No. 2961, FE Docket No. 10-111-LNG, Opinion and Order Conditionally Granting Long-Term Authorization to Export Liquefied Natural Gas from Sabine Pass LNG Terminal to Non-Free Trade Agreement Nations at 34 (May 20, 2011).

The IECA Pleading attempts to bolster its argument by providing purported “real time” examples of price convergence. First, IECA contends that because U.S. crude oil and gasoline prices are connected to the global market, rises in global prices results in higher U.S. gasoline, fuel oil, and jet fuel prices.²² These claims are unsupported by any data.²³

Next, IECA claims that rising LNG exports from Australia have supposedly resulted in Australian consumers paying the higher Asian LNG net back price of between \$8 to \$10/MMBtu.²⁴ This example is inapposite, as Australia and the United States are not alike. Australia lacks the large, integrated natural gas transportation pipeline grid and diversity of supply of the United States. In fact, the United States has almost four times the volume of proved natural gas reserves as compared to Australia, and is the largest global natural gas producer.²⁵ As DOE/FE has previously found, given the magnitude of the well-supplied domestic U.S. natural gas market, LNG exports are unlikely to alter the pricing of domestic gas.²⁶

IECA finally claims that the 2018 Study supports its position because the study predicts that natural gas prices may rise from \$3 to \$6/MMBtu and because the study supposedly confirms that U.S. prices “will reach parity with Asia” resulting in economic harm, particularly to

²² IECA Pleading at 6.

²³ Various studies suggest there is either no relationship between crude oil exports and petroleum product prices, or that in fact, exports may result in lower prices. *See, e.g., U.S. Energy Information Administration*, Effects of Removing Restrictions on U.S. Crude Oil Exports at ix (Sept. 2015) (“Petroleum product prices in the United States, including gasoline prices, would be either unchanged or slightly reduced by the removal of current restrictions on crude oil exports.”); *ICF International*, The Impacts of U.S. Crude Oil Exports on Domestic Crude Production, GDP, Employment, Trade, and Consumer Costs at 11 (Mar. 31, 2014). Therefore, IECA is wrong in implying the U.S. crude oil example proves that rising LNG exports will cause rising domestic gas prices.

²⁴ IECA Pleading at 6.

²⁵ *U.S. Energy Information Administration*, International Energy Statistics – Proved Reserves of Natural Gas, https://www.eia.gov/beta/international/data/browser/#/?pa=00000000000000000004&c=rurvrvrvfvtvrvvlurvrvrvfvrvrvrvfvvov20evrvrvrvrvrvrvvov&ct=0&tl_id=3002-A&vs=INTL.3-6-AFG-TCF.A&cy=2018&vo=0&v=H; *U.S. Energy Information Administration*, United States Remains the World’s Top Producer of Petroleum and Natural Gas Hydrocarbons (May 21, 2018), <https://www.eia.gov/todayinenergy/detail.php?id=36292>.

²⁶ *Sabine Pass Liquefaction, LLC*, DOE/FE Order No. 2961 at 34.

manufacturers who are large users of natural gas.²⁷ In fact, as DOE/FE pointed out, “the 2018 Study shows that U.S. natural gas prices will *not* rise to the same level as global natural gas prices as a result of increased LNG exports. This result is consistent with the 2015 Study’s analysis of the linkages between U.S. and global natural gas prices”²⁸ Moreover, despite the relatively modest predicted increase in U.S. natural gas prices, the 2018 Study concluded higher LNG exports will provide overall macroeconomic benefits to the U.S. economy. Accordingly, DOE/FE should dismiss IECA’s arguments.

3. *IECA’s Remaining Claims are Unsupported, Irrelevant, and Beyond the Scope of this Proceeding and Should be Disregarded*

Finally, the IECA Pleading contains a laundry list of irrelevant arguments that have no factual support and little, if any, bearing on the instant proceeding. Moreover, none of these arguments directly relate to PALNG’s Design Increase. Therefore, DOE/FE should disregard each of these comments.

First, IECA argues that the global LNG market is not a free market and that LNG buyers are state-owned enterprises and foreign country utilities that have buying market power.²⁹ IECA provides no support for this sweeping and economically baseless claim.

Second, IECA contends that DOE failed to consider pipeline and storage capacity risk constraints (and at peak demand) and their cost and reliability impact.³⁰ Again, IECA provides no

²⁷ IECA Pleading at 7.

²⁸ 83 Fed. Reg. at 62768 (emphasis added) (citing *Golden Pass Products LLC*, DOE/FE Order No. 3978, FE Docket No. 12-156-LNG, Opinion and Order Granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from the Golden Pass LNG Terminal Located in Jefferson County, Texas, to Non-Free Trade Agreement Nations at 91-92 (Apr. 25, 2017)).

²⁹ IECA Pleading at 8.

³⁰ *Id.*

support for this claim, which moreover, is beyond DOE/FE's purview and the scope of this proceeding.

Third, IECA states that DOE's failure to consider infrastructure pipeline deliverability storage limitations is inconsistent with President Trump's concern for reliability and resiliency of the electric grid.³¹ This assertion is unsupported and irrelevant to this proceeding. To the extent IECA is concerned with reliability, instead of opposing exports, it should support the development of the electric grid and natural gas infrastructure, which is under FERC's purview.

Fourth, IECA argues that DOE failed to address cumulative demand versus natural gas resources, claiming that estimates show that forecasted demand will outstrip new resources.³² The IECA Pleading does not provide support for these assertions.

Fifth, IECA suggests that DOE's LNG export studies overestimate the amount of natural gas that is economical to produce "when no one really knows because no one has ever drilled a well in these new fields or frontier field."³³ This claim is unsupported and irrelevant.

Sixth, IECA cautions that limitations imposed by states and future administrations could limit drilling and access to gas, raising gas prices.³⁴ This is beyond the scope of DOE's review or control.

Next, IECA claims that most oil and gas producers do not have positive cash flows. IECA also states that investors demand certain returns on equity to continue to invest or lend money to drill more wells, and that rising interest rates are placing pressure on costs.³⁵ These statements are

³¹ *Id.*

³² *Id.* at 8-9.

³³ *Id.* at 9.

³⁴ *Id.*

³⁵ *Id.*

unsupported, irrelevant, and beyond the scope of this proceeding. Moreover, IECA fails to show a causal relationship between these disparate “facts” and a supposed rise in domestic gas prices.

Finally, IECA asserts that foreign consumers of U.S. LNG exports are receiving the benefits of using U.S. infrastructure that is paid for by U.S. consumers.³⁶ This claim runs counter to basic economic principles. Not only are the prices of LNG exports to foreign buyers likely to reflect the costs of related infrastructure, but they will also reflect additional transportation, liquefaction, shipping, and regasification costs that would not be reflected in domestic U.S. natural gas prices. IECA does not explain why or how U.S. entities would economically export LNG to foreign customers if they were unable to recoup their costs. Moreover, DOE’s LNG export studies have repeatedly found that increased LNG exports will result in macroeconomic benefits, including increased GDP. IECA’s claim is completely unsupported.

³⁶ *Id.*

III. CONCLUSION

For the reasons set forth above, PALNG requests that the DOE/FE deny IECA's motion to intervene, reject its protest, and disregard its comments in this proceeding.

Respectfully submitted,

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Dated: April 18, 2019

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list in this proceeding.

Dated at Washington, DC this 18th day of April 2019.

/s/ Lamiya Rahman

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