

Late Filing - Received after 4:30 pm

Ross E. Eisenberg

Vice President

Energy & Resources Policy

November 17, 2014

Mr. John A. Anderson
Office of Fossil Energy
United States Department of Energy
Docket Room 3F-056, FE-50
Forrestal Building
1000 Independence Avenue, SW
Washington, DC 20585

RE: Alaska LNG Project LLC, Docket No. 14-96-LNG Support of Application for Long-Term Authorization to Export Liquefied Natural Gas

Dear Mr. Anderson:

The National Association of Manufacturers (NAM), the largest manufacturing association in the United States representing manufacturers in every industrial sector and in all 50 states, submits these comments to the Department of Energy (DOE) on the Alaska LNG Project LLC application for long-term authorization to export liquefied natural gas (LNG) to Free Trade Agreement and Non-Free Trade Agreement countries.

Manufacturers support principles of free trade and open markets in the context of energy exports. The Alaska LNG Project has the potential to unlock the vast natural gas resources on the North Slope of Alaska, creating jobs and providing ample natural gas to industrial and residential consumers in Alaska while creating opportunities for LNG exports. The Alaska LNG Project will cost \$45 to \$65 billion and take up to 12 years to construct, providing direct economic benefits to Alaska in the form of 15,000 new construction jobs and 1,000 permanent jobs, decades worth of domestically-produced natural gas for homes, manufacturers, and businesses in Alaska, and new opportunities across the manufacturing supply chain.

Alaska LNG has asked for conditional authorization to export LNG; the DOE has deferred a decision on whether its revised procedures for LNG export applications in the lower 48 states should apply to Alaska.¹ As the Alaska LNG applicants correctly point out, the DOE has consistently treated applications to export LNG from Alaska differently from lower 48 applications.² It is certainly within the DOE's authority to do so in this case. The Presidential Finding Concerning Alaska Natural Gas³ supports a similar conclusion.

¹ 79 Fed. Reg. 48132 (stating that "the revised procedures will apply only to exports from the lower-48 states" and "DOE will consider whether to issue a conditional decision . . . in the context of" the Alaska LNG application).

² See, e.g., *ConocoPhillips Alaska Natural Gas Corp.*, DOE/FE Order No. 3418 at 5 (Apr. 14, 2014); *ConocoPhillips Alaska Natural Gas Corp. and Marathon Oil Co.*, DOE/FE Order No. 2500 at 45 (June 3, 2008).

³ 53 Fed. Reg. 999.

Manufacturers encourage the DOE to expeditiously consider the application by the Alaska LNG Project for long-term authorization to export LNG to both Free Trade Agreement and Non-Free Trade Agreement countries.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ross Eisenberg", is placed on a light yellow rectangular background.

Ross Eisenberg
Vice President
Energy and Resources Policy