

Date: April 26, 2024



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**VIA EMAIL TO:**

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U.S. Department of Energy (FE-34)  
Office of Regulation, Analysis, and  
Engagement  
Office of Fossil Energy and Carbon  
Management  
Forrestal Building, Room 3E-056  
1000 Independence Avenue SW  
Washington, DC 20585

**RE: DELFIN LNG LLC Request  
Docket No. 13-147-LNG**

**COMMENTS OF CENTRICA LNG COMPANY LIMITED  
IN SUPPORT OF REQUEST OF DELFIN LNG LLC  
DATED MARCH 1, 2024**

Dear Sir / Madam,

Pursuant to Part 590 of the regulations of the U.S. Department of Energy (“DOE”)<sup>1</sup> and the Notice of Request for Supplemental Order Granting Conditional Extension of Time for Long-Term Authorization to Export Liquefied Natural Gas of Delfin LNG LLC (“Delfin”) published by the Office of Fossil Energy and Carbon Management (“DOE/FECEM”) in the Federal Register on March 29, 2024,<sup>2</sup> Centrica LNG Company Limited (“Centrica”) hereby submits comments in support of Delfin’s request for an extension of time to allow Delfin to commence export operations from the proposed Delfin Deepwater Port by no later than June

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<sup>1</sup> 10 C.F.R. Part 590.

<sup>2</sup> 89 Fed. Reg. 22,137 (Mar. 29, 2024).

1, 2029, which is a five-year extension of the existing deadline set forth in DOE/FE Order No. 4028, as amended.<sup>3</sup> In support of its comments, Centrica represents as follows:

## **I. Background**

Centrica's parent company Centrica PLC is the largest energy supplier in the United Kingdom and is also the owner of British Gas, Scottish Gas, and Bord Gáis (energy supplier in the Republic of Ireland). Centrica is a leading liquefied natural gas ("LNG") importer through the import terminal at the Isle of Grain, which is located 37 miles east of London, England. Delfin and Centrica PLC announced on July 11, 2023 that the parties have entered into a binding LNG sale and purchase agreement ("LNG SPA") for 1.0 metric tonnes per annum of LNG for a 15-year term, from the first floating LNG vessel ("FLNGV1") that Delfin proposes to construct at the planned deepwater port to be located in the Gulf of Mexico. Delfin's deepwater port will utilize existing offshore natural gas pipelines to access abundant natural gas supplies from the United States and transport it to Delfin's floating LNG facilities that will be moored in federal waters offshore Louisiana.

## **II. Comments in Support of Delfin's Requested Extension of Time**

As a long-term customer of Delfin under the LNG SPA, Centrica has a substantial interest in Delfin's request for an extension of time. Accordingly, Centrica respectfully requests that DOE/FECM grant Delfin's requested extension of time.

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<sup>3</sup> *Delfin LNG LLC*, DOE/FE Order No. 4028, Docket No. 13-147-LNG (June 1, 2017), *reh'g denied*, Order No. 4028-A (Apr. 3, 2018), *amended by* Order No. 4028-B (Dec. 10, 2020) (extending export term), *further amended by* Order No. 4028-C (May 18, 2021) (correcting and amending location of floating LNG vessels).

Following the onset of the European energy crisis in early 2022, the critical importance of investing in the United Kingdom's energy security and addressing the immediate impact of the energy crisis on behalf of Centrica's customers has been one of Centrica's biggest priorities. Natural gas is an essential transition fuel in the move to net zero emissions and securing LNG from the United States is vital to the United Kingdom's energy security. There is clear recognition of the important role that LNG exports from the United States have played in helping Europe in meeting its energy needs during these difficult times, as well as the future role of LNG from the United States in Europe's long term energy mix. Securing LNG supply from Delfin is a crucial part of Centrica's plan to achieve these goals.

Delfin's project is unique as it is the first floating LNG export project to receive conditional approval from the Maritime Administration for deployment offshore the United States. Since the successful launch of the world's first floating LNG vessel in 2017, five further floating LNG vessels have been put into operation globally in the past seven years. During this period, the maturation of floating liquefaction technology as well as the experience and track record established across the supply chain has been a necessary phase for technology and costs to be improved and optimized before successfully securing Centrica's long term offtake commitment in 2023 from Delfin's FLNGV1. From an offtaker's perspective, this maturation process impacted the commencement of LNG exports by Delfin. In addition, operational experience in and maturity of floating liquefaction

technology is important in securing investor and lender confidence to fund the development of a floating liquefaction project in the United States.

Given Centrica's substantial interest in FLNGV1 reaching completion as a long-term customer of Delfin, Centrica supports Delfin's request for DOE/FECM to issue an order modifying Delfin's existing export authorizations to allow Delfin to commence export operations from the Delfin Deepwater Port by June 1, 2029, and respectfully requests that DOE/FECM grant the requested extension by no later than the current June 1, 2024 deadline in order to facilitate Delfin's expected Final Investment Decision on FLNGV1 in the second half of 2024.

### **III. Conclusion and Verification**

For the foregoing reasons, Centrica requests that DOE/FECM consider these comments in acting on Delfin's extension request.

The undersigned certifies that I am a duly authorized representative of Centrica and affirms under penalty of perjury under the laws of the United States of America that the facts set forth herein are true and correct to the best of my knowledge, information and belief. The undersigned also certifies that a copy of this letter has been sent by email to the service list for the referenced docket on April 26, 2024.

Respectfully submitted,



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Albert Bong  
Director  
Centrica LNG Company Limited