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**By Docket Room at 8:34 am, Apr 29, 2024**

**PSE**

**Pacific Summit  
Energy LLC**

April 26, 2024

U.S. Department of Energy (FE-34)  
Attn: Ms. Amy Sweeney, Director  
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

By E-Mail to [fergas@hq.doe.gov](mailto:fergas@hq.doe.gov)

RE: Delfin LNG LLC; Request for Supplemental Order Granting Conditional Extension of Time for Long-Term Authorization To Export Liquefied Natural Gas, Docket No. 13-147-LNG

Dear Ms. Sweeney:

Pacific Summit Energy LLC (“PSE”) strongly supports the request filed by Delfin LNG LLC (“Delfin”) with the U.S. Department of Energy (“DOE”) in the referenced docket for an extension of time of the commencement deadline set forth in Delfin’s long-term non-free trade agreement authorization to export liquefied natural gas (“LNG”).

As background, PSE is a marketer and trader of natural gas, LNG, and power with offices in California, Texas, and Virginia. As part of its marketing business, PSE purchases and sells LNG cargos from U.S. liquefaction terminals in the global LNG market. PSE is an affiliate of Sumitomo Corporation, the Japanese global enterprise with over 100 years of successful business history. In addition to PSE, other affiliates of Sumitomo Corporation are engaged in activities throughout the LNG value chain worldwide.

PSE believes that granting Delfin’s extension request, which requests additional time until June 1, 2029 to commence LNG export operations, is in the public interest for the following reasons:

- **Public Interest and Innovative Design:** Delfin’s LNG export project reflects a public interest endeavor by leveraging innovative floating liquefaction technology in a floating liquefaction vessel (“FLNGV”). Structured as a deepwater port, the project uniquely utilizes existing offshore natural gas pipelines to efficiently tap into abundant American natural gas supplies. This design minimizes environmental impacts while enhancing energy supply chains from a strategic location offshore of Louisiana.
- **Readiness and Viability:** Despite previous delays experienced by Delfin due to unforeseen circumstances, Delfin has reached a significant milestone towards commercial readiness. The project is poised to make a final investment decision on its initial FLNGV, demonstrating viability and preparedness for advancing to operational stages.

- **Economic and Strategic Importance:** Delfin’s first FLNGV is backed by long-term off-take agreements, underscoring the economic foundation and the critical need for its contracted LNG supplies, especially in light of recent global events such as the energy crisis precipitated by geopolitical tensions.
- **Regulatory Support and International Relations:** The reliability of the U.S. regulatory framework in facilitating LNG projects like Delfin’s is paramount. It fosters international trust and cooperation, which is particularly important as U.S.-sourced LNG plays a crucial role in global energy stability.
- **Commitment to Environmental and Social Goals:** As PSE engages in discussion with Delfin, we aim to expand our business by capitalizing on our expertise in both the U.S. natural gas and global LNG markets. Our pursuit of collaboration with Delfin is part of a broader commitment to climate change mitigation, as outlined by the Sumitomo Corporation Group. We are dedicated to reducing CO<sub>2</sub> emissions significantly by 2035 and achieving carbon neutrality in our operations by 2050. By engaging with LNG projects like Delfin, PSE aims to contribute to a decarbonized society and enhance energy security, which is especially critical for Asian markets including Japan.

PSE requests that the DOE grant the extension of time requested by Delfin. Doing so not only supports a strategically critical infrastructure project, but also aligns with broader U.S. goals of energy security, economic stability, and environmental responsibility. We appreciate your consideration of this matter and look forward to the positive impact that the Delfin LNG export project will continue to have on the U.S. and global energy landscape.

Respectfully submitted,

PACIFIC SUMMIT ENERGY LLC

DocuSigned by:  
*Eijiro Nagao*  
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Eijiro Nagao  
President & Chairman

Enclosure: Verification

## VERIFICATION

Pursuant to 10 C.F.R. § 590.107.103(b), the undersigned hereby certifies that he is a duly authorized representative of Pacific Summit Energy LLC and that the facts set forth in the foregoing comment letter are true and correct to the best of his knowledge, information, and belief.

Under 28 U.S.C. § 1746, I certify under penalty of perjury that the foregoing is true and correct. Executed at The Woodlands, Texas, this 26<sup>th</sup> day of April, 2024.

DocuSigned by:  
*Eijiro Nagao*  
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Eijiro Nagao