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UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL ENERGY AND CARBON MANAGEMENT

In the Matter of:	)	
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Plaquemines Expansion, LLC	)	**Docket No. 26-___-LNG**
	)	

APPLICATION OF
PLAQUEMINES EXPANSION, LLC
FOR AUTHORIZATIONS TO EXPORT LIQUEFIED NATURAL GAS
TO FREE TRADE AND NON-FREE TRADE AGREEMENT NATIONS

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Pursuant to Section 3 of the Natural Gas Act ("NGA")[1] and Part 590 of the regulations of the Department of Energy ("DOE"),[2] Plaquemines Expansion, LLC ("Plaquemines Expansion" or the "Applicant,") hereby submits for filing this application ("Application") to the Office of Fossil Energy and Carbon Management of the DOE ("DOE/FECM") for long-term, multi-contract authorizations (along with related short-term authorizations[3]) to export additional domestically produced liquefied natural gas ("LNG") from the Plaquemines LNG Terminal (the "Plaquemines Terminal") constructed and operated by Applicant's affiliate Venture Global Plaquemines LNG, LLC ("Plaquemines LNG"), including the LNG loading berth to be constructed as part of the

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[1] 15 U.S.C. § 717b (2018). Authority to regulate the import and export of natural gas under NGA Section 3 has been delegated to the Assistant Secretary for Fossil Energy pursuant to Redelegation Order No. 00-002.04G issued on June 4, 2019.

[2] 10 C.F.R. Part 590 (2025).

[3] On December 18, 2020, DOE issued a Policy Statement discontinuing its practice of issuing separate long-term and short-term authorizations for exports of natural gas from the same facility. "Including Short-Term Export Authority in Long-Term Authorizations for the Export of Natural Gas on a Non-Additive Basis," Policy Statement, 86 Fed. Reg. 2243 (Jan. 12, 2021) ("Including Short-Term Policy Statement"). Instead, long-term authorizations to export domestically produced natural gas may include additional authority to export the same approved volume pursuant to transactions with terms of less than two years (including commissioning volumes) on a non-additive basis. Accordingly, Plaquemines Expansion requests that its long-term authorizations also allow for the export of the approved volumes on a short-term or spot basis.

proposed Plaquemines Expansion Project described below. Both the Plaquemines Terminal and the proposed Plaquemines Expansion Project are located on the west bank of the Mississippi River in Plaquemines Parish, Louisiana. The authorizations to export additional volumes of natural gas requested in this Application relate to the new liquefaction facilities capable of producing a peak output of approximately 31 million metric tonnes per annum ("MTPA") of LNG, as well as other related facilities, proposed in the Plaquemines Expansion Project ("Expansion Project" or "Project").

The Plaquemines Terminal, as currently authorized by the Federal Energy Regulatory Commission ("FERC"),[4] has a nameplate liquefaction and export capacity of approximately 20 MTPA and a peak achievable capacity of 27.2 MTPA under optimal operating conditions.[5] Contemporaneously with the filing of this Application, Plaquemines Expansion and Plaquemines LNG filed with FERC a joint application pursuant to NGA Section 3 for authorization of the siting, construction, and operation of the Expansion Project.

In connection with the FERC application for the Expansion Project, Plaquemines Expansion in this Application requests authorization from DOE/FECM to export from the Plaquemines Terminal and the Expansion Project an amount of LNG equivalent to 1,624.25 billion cubic feet per year ("Bcf/yr") (approximately equal to 31 MTPA) to any country which has, or in the future develops, the capacity to import LNG via ocean-going carriers and with which the

[4] The Secretary of DOE has delegated to FERC the authority to approve or disapprove the construction and operation of natural gas import and export facilities and the site at which such facilities shall be located. The most recent such delegation is DOE Delegation Order No, 00-044.00A, effective May 16, 2006.

[5] *Venture Global Plaquemines LNG, LLC*, *et al.* 168 FERC ¶ 61,204 (2019) ("Authorization Order"). Earlier this year, FERC amended the Authorization Order to authorize the increase in the maximum liquefaction capacity of the Plaquemines Terminal from 24 MTPA of LNG to 27.2 MTPA without any new facilities, construction activities, or facility modifications. *Venture Global Plaquemines LNG, LLC*, 190 FERC ¶ 61,113 (2025) ("Uprate Order").

U.S. either (1) has a Free Trade Agreement ("FTA") requiring national treatment for trade in natural gas[6] or (2) does not have such a FTA but with which trade is not prohibited by U.S. law or policy ("non-FTA" nations). Prior authorizations for natural gas exports from the Plaquemines Terminal have been issued by DOE in Docket No. 16-28-LNG to Plaquemines LNG.[7] The additional export volumes requested in this Application reflect the total peak capacity under optimal conditions of the facilities to be added by the Expansion Project, which include sixteen (16) new single mixed refrigerant (SMR) liquefaction blocks (each containing two process trains) and other supporting infrastructure, as proposed to FERC.

Plaquemines Expansion requests this authority to export the requested volumes of LNG to both FTA and non-FTA nations on a non-additive basis. The Applicant requests the export authorizations on its own behalf and as agent for other entities that may hold title to the LNG at the time of export from the Plaquemines Terminal, consistent with DOE/FECM precedent. It Applicant requests a term of twenty (20) years after the commencement of commercial exports under the authorization for both the FTA and non-FTA export authorizations, plus a three-year make-up period at the end of that term consistent with recent DOE practice.[8]

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6 The U.S. currently has FTAs requiring national treatment for trade in natural gas with Australia, Bahrain, Canada, Chile, Colombia, Dominican Republic, El Salvador, Guatemala, Honduras, Jordan, Mexico, Morocco, Nicaragua, Oman, Panama, Peru, Republic of Korea, and Singapore. In addition to current FTA nations, Plaquemines LNG expressly requests that its FTA authorization include any additional nation which DOE subsequently identifies publicly as having entered into a free trade agreement providing for national treatment for trade in natural gas, or that otherwise is treated as (or equivalent to) an FTA nation by the U.S., provided that the destination nation has the capacity to import LNG. For ease of reference, Applicant refers herein to all such nations simply as "FTA nations."

7 As detailed in Section III below, Plaquemines LNG is currently authorized to export 1,405.33 Bcf per year (approximately equivalent to 27.2 MTPA) to FTA nations while its non-FTA export authorization currently is limited to 1,240 Bcf per year (about 24 MTPA) pending DOE/FECM action on a pending amendment application. *See Venture Global Plaquemines LNG, LLC*, Order No. 3866-B, Docket No. 16-28-LNG (June 13, 2022) (amending Plaquemines LNG's authorized level of exports to FTA nations) and *Venture Global Plaquemines LNG, LLC*, Order No. 4446, Docket No. 16-28-LNG (Oct. 16, 2019) (hereinafter "Plaquemines LNG 2019 Non-FTA Authorization").

8 *See Port Arthur LNG Phase II, LLC*, DOE/FECM Order No. 5292-A, Docket No. 20-23-LNG at 3-5 (June 30, 2025) (amending authorization to allow a three-year make-up period past the end of 2050 to export the

Consistent with the different standards under Section 3 of the NGA applicable to natural gas exports to FTA and non-FTA nations,[9] and with previous DOE orders, Plaquemines Expansion requests that DOE/FECM issue two separate orders authorizing the proposed incremental LNG exports to FTA nations and to non-FTA nations respectively.

In support of this Application, Plaquemines LNG respectfully states the following:

I. DESCRIPTION OF THE APPLICANT

The exact legal name of the Applicant is Plaquemines Expansion, LLC. Plaquemines Expansion is a Delaware limited liability company with its primary place of business located at 1401 McKinney Street, Suite 2600, Houston, TX 77010. Plaquemines Expansion is primarily engaged in the business of developing the Expansion Project.

Plaquemines Expansion is an indirect, wholly-owned subsidiary of Venture Global LNG, Inc. ("Venture Global"). Venture Global, which is a Delaware corporation with its primary place of business located at 1001 19th Street North, Suite 1500, Arlington, VA 22209, is a long-term, low-cost provider of U.S.-produced LNG sourced from resource rich North American natural gas basins to world markets. Its business includes assets across the LNG supply chain, including LNG production, natural gas transport, shipping and regasification. Of particular relevance here, Venture Global is the developer, owner, and operator of LNG export projects using modular mid-scale plant designs with reliable, proven technology and innovative configuration to offer low cost,

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approved volumes of LNG). *See also, e.g., Venture Global CP2 LNG, LLC*, DOE/FECM Order No. 5264-A, Docket No. 21-131-LNG, at 64-65 (Oct. 21, 2025) (hereinafter "*CP2 LNG* 2025 Order").

[9] NGA Section 3(c) provides that the export of natural gas to a nation with which there is in effect an FTA requiring national treatment for trade in natural gas shall be deemed to be consistent with the public interest and requires that such applications be granted without modification or delay. Section 3(a) provides that applications to export LNG to non-FTA nations shall be authorized unless the Secretary finds that the proposed exports will not be consistent with the public interest. Such exports are presumptively in the public interest and that presumption can be overcome only through an affirmative demonstration that the proposed export is inconsistent with the public interest, as explained below.

clean and reliable U.S. natural gas supplies to the world. In addition to the Plaquemines Terminal, Venture Global is the developer, owner, and operator of the Calcasieu Pass LNG Terminal that is currently in operation and the CP2 LNG Terminal that is under-construction, which are both located in Cameron Parish, Louisiana. Additional information regarding Venture Global and its leadership, personnel, and projects is available at the company's website: https://ventureglobal.com/.

Venture Global's parent company – Venture Global, Inc. ("VG") – is a Delaware corporation with the same principal address as Venture Global, whose Class A common stock is publicly traded and listed on the New York Stock Exchange (NYSE: VG). As of the date of this Application, VG's controlling shareholder, Venture Global Partners II, LLC ("VG Partners"), holds approximately 98.7% of the combined voting power of VG's stock, and controls the management and policies of Venture Global and, thus, controls Plaquemines Expansion. VG Partners is a Delaware limited liability company with the same principal address as Venture Global, and it is 50 percent owned and controlled by each of the two founders of Venture Global, Michael A. Sabel and Robert B. Pender.

The officers and directors of Plaquemines Expansion are all U.S. citizens. The Applicant is not owned, in whole or in part, directly or indirectly, or subsidized directly or indirectly, by any foreign government nor is it committed by contract to allow such ownership or subsidy by any foreign government.

II. CORRESPONDENCE AND COMMUNICATIONS

All correspondence and communications concerning this Application should be addressed to the following persons:

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III. EXISTING PLAQUEMINES TERMINAL AND EXPORT AUTHORIZATIONS

The proposed Expansion Project will be interconnected with and utilize certain facilities of the Plaquemines Terminal. On September 30, 2019, the FERC granted Plaquemines LNG authorization to site, construct, and operate that LNG export terminal and associated facilities on an approximately 632-acre site on the west bank of the Mississippi River near river mile marker 55 in Plaquemines Parish, Louisiana on land leased from the Port of Plaquemines.[10] The Plaquemines Terminal facilities, as currently authorized by FERC, include, *inter alia*, 18 liquefaction blocks (each containing two SMR process trains); four full containment, above-ground LNG storage tanks each with a capacity of approximately 200,000 cubic meters; two 710-megawatt combined-cycle gas-fired electric power generation plants; and three LNG marine loading berths.

Plaquemines LNG's construction on the Plaquemines Terminal site commenced on August 18, 2021. During 2021 and continuing into early 2022, Plaquemines LNG entered into

[10] *Venture Global Plaquemines LNG, LLC*, 168 FERC ¶ 61,204 (2019).

binding, long-term LNG Sales and Purchase Agreements ("SPAs") for a total of 13 MTPA with five major international companies. On May 25, 2022, Venture Global announced its FID and the closing of the project financing for the initial 13.33 MTPA of nameplate capacity (12 liquefaction blocks) phase of the Plaquemines LNG project (and the affiliated Gator Express Pipeline), with a lender group providing debt for the $13.2 billion construction financing including many of the world's leading Asian, European, and North American project finance banks.[11] Since that date (indeed from even sooner), Plaquemines LNG has proceeded with construction and commissioning of the project so as to begin supplying incremental American natural gas to international markets safely and as quickly as feasible.

On March 13, 2023, Venture Global announced its FID and the closing of an additional $7.8 billion project financing for the second phase of the Plaquemines LNG project (including the remaining six liquefaction blocks), again with a lender group including the world's leading banks.[12] The proceeds of the debt and equity financing fully funded the anticipated balance of construction and commissioning of the entire project. By that time, Plaquemines LNG had entered into a total of fourteen SPAs for its full 20 MTPA nameplate capacity, with 19.7 MTPA of it contracted for 20-year terms commencing at the commercial operations date of the relevant Phase of the Plaquemines LNG Project. Plaquemines LNG also has entered into two long-term SPAs for the available annual quantities in excess of the nameplate capacity of the relevant Phase. All of

[11] *See* Press Release, *Venture Global Announces Final Investment Decision and Financial Close for Plaquemines LNG,* May 25, 2022, *available at* https://venturegloballng.com/press/venture-global-announces-final-investment-decision-and-financial-close-for-plaquemines-lng/.

[12] *See* Press Release, *Venture Global Announces Final Investment Decision and Financial Close for Phase Two of Plaquemines LNG,* Mar. 13, 2023, *available at* https://venturegloballng.com/press/venture-global-announces-final-investment-decision-and-financial-close-for-phase-two-of-plaquemines-lng/.

these long-term SPAs have been filed by Plaquemines LNG with DOE in accordance with the requirements of its export authorizations and DOE policies.[13]

Venture Global's innovative approach to LNG project construction – pioneered at the Calcasieu Pass LNG facility that is now fully in commercial operation – involves mid-scale, factory-fabricated liquefaction trains that are built and assembled off-site and then shipped to the Project site fully-assembled and packaged for installation. The trains and other facilities, many of which are likewise factory-fabricated offsite, are then commissioned and begin producing LNG sequentially, after receiving the requisite approvals from the FERC Staff. Plaquemines LNG commenced LNG production and exported its first commissioning cargo on December 26, 2024, as reported to DOE/FECM in a notification submitted on January 8, 2025. Since that date, Plaquemines LNG has continued exporting commissioning cargos. Information on all the exports are provided by Plaquemines LNG to DOE/FECM in the required monthly reports.

While its project design enabled Plaquemines LNG to accelerate construction and to commence LNG production and exports expeditiously, it also entails a substantially longer commissioning process than for traditional LNG export projects (with a few, very large "stick-built" liquefaction trains). Details regarding the status of the ongoing construction and commissioning of the Plaquemines Terminal are available in the numerous filings and issuances in FERC Docket No. CP17-66, including in monthly construction reports and (since LNG production began) weekly commissioning reports. Plaquemines LNG anticipates receiving authorization to place all of its Phase 1 facilities in-service (24 liquefaction trains and related

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13 Plaquemines LNG's filings related to its long-term contracts are available on DOE/FECM's website at: https://www.energy.gov/fecm/articles/plaquemines-lng-facility.

facilities) during the fourth quarter of 2026, and the remaining Phase 2 facilities in-service by mid-2027.[14]

DOE granted Plaquemines LNG long-term, multi-contract authority to export LNG to (1) FTA nations in DOE/FE Order No. 3866 issued Docket No. 16-28-LNG on July 21, 2016 and (2) non-FTA nations in DOE/FE Order No. 4446 issued in that same docket on October 16, 2019 (the "Plaquemines LNG 2019 Non-FTA Authorization"). As amended, each of these export authorizations extends through December 31, 2050, consistent with DOE's "2050 Policy Statement" establishing that end-date as the standard export term for long-term non-FTA authorizations unless a shorter term is requested.[15] Those orders authorized Plaquemines LNG to export LNG to both FTA and non-FTA nations in a volume equivalent to 1,240 Bcf/yr (on a non-additive basis), which is approximately 24.0 MTPA of LNG (the peak output as originally authorized by FERC).

On March 11, 2022, Plaquemines LNG submitted to DOE/FECM an application for a limited amendment of its existing export authorizations to increase the authorized export volumes from 1,240 Bcf per year to 1,405.33 Bcf per year, based on a refined analysis of the peak liquefaction capacity of the already authorized facilities and a related "uprate" application submitted to FERC. DOE/FECM issued Order No. 3866-B on June 13, 2022, amending Plaquemines LNG's authorized level of exports to FTA nations, as requested. FERC issued its

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[14] The FERC recently granted a request for an extension of time that allows Plaquemines LNG until December 31, 2027 to place all of the Authorized Facilities in-service. Unpublished letter order issued in FERC Docket No. CP17-66-002 on Oct. 16, 2025, Accession No. 20251016-3130.

[15] *Venture Global Plaquemines LNG, LLC*, DOE/FE Order Nos. 3866-A and 4446-A, Docket No. 16-28-LNG (Oct. 21, 2020), extending the terms pursuant to "Extending Natural Gas Export Authorizations to Non-Free Trade Agreement Countries Through the Year 2050," Notice of Final Policy Statement and Response to Comments, 85 Fed. Reg. 52237 (Aug. 25, 2020) (the "2050 Policy Statement").

Uprate Order approving Plaquemines LNG's request for the amendment of its FERC authorization to reflect the requested increased peak output on February 19, 2025.[16] As of the date of this Application, DOE/FECM has not yet acted on the non-FTA portion of Plaquemines LNG's requested uprate amendment.

IV. DESCRIPTION OF THE PLAQUEMINES EXPANSION PROJECT

Given extraordinary customer demand for incremental LNG beyond the output of its already authorized facilities and the significant commercial, environmental, and timing advantages of a brown-field expansion, as well as the current Administration's strong support of LNG exports,[17] Venture Global is now proposing the Expansion Project adjacent to the Plaquemines Terminal. The Expansion Project will allow for needed incremental exports of abundant, clean-burning U.S. domestic natural gas supplies to overseas markets.

The total estimated construction cost for the Expansion Project will be at least $18 billion, with well in excess of $3 billion of Project costs expected to be spent at locally or regionally based suppliers. The Project's construction workforce is expected to average about 4,000 people over an approximately four-year period, with the workforce rising at its peak to 9,000 workers. The Project

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16 *Venture Global Plaquemines LNG, LLC*, 190 FERC ¶ 61,113 (2025). Certain environmentalist organizations requested rehearing of the order, and FERC issued a notice denying rehearing by operation of law on April 21, 2025.

17 Executive Orders issued on the first day of the Administration recognized the benefits of LNG exports. The Energy Emergency Executive Order recognized that "the United States has the potential to use its unrealized energy resources domestically, and to sell to international allies and partners a reliable, diversified, and affordable supply of energy. This would create jobs and economic prosperity for Americans forgotten in the present economy, improve the United States' trade balance, help our country compete with hostile foreign powers, strengthen relations with allies and partners, and support international peace and security." Exec. Order No. 14156, 90 Fed. Reg. 8,433 (Jan. 20, 2025). That same day, the Unleashing Energy Executive Order directed the DOE to "restart reviews of applications for approvals of liquified natural gas export projects as expeditiously as possible, consistent with applicable law." Exec. Order No. 14154, 90 Fed. Reg. 8353, 8357 (Jan. 20, 2025). That Executive Order also directs that "[i]n assessing the 'Public Interest' to be advanced by any particular application" to export LNG under NGA Section 3(a), DOE "shall consider the economic and employment impacts to the United States and the impact to the security of allies and partners that would result from granting the application." *Id.* As noted further below, DOE/FECM has since expeditiously moved forward with "unleashing" LNG exports.

will result in significant economic and tax benefits to Plaquemines Parish and the State of Louisiana, as well as all the other benefits of LNG exports well-understood by DOE.[18]

The FERC approved the request by the Applicant, together with Plaquemines LNG, to initiate its National Environmental Policy Act ("NEPA") "pre-filing" process for the Expansion Project on April 4, 2025. The two affiliates subsequently engaged in and have now completed the pre-filing process in FERC Docket No. PF25-7. During that process, they participated in meetings with local, state, and federal agencies and interested parties to seek greater stakeholder involvement, identify interests, and resolve concerns early in the review of the Expansion Project, including through public scoping meetings and public comments filed with FERC.

Contemporaneously with the filing of this Application, Plaquemines Expansion and Plaquemines LNG submitted their formal application with FERC for its authorization under NGA Section 3 of the siting, construction, and operation of the Expansion Project. The proposed Expansion Project facilities will be situated on an approximately 587-acre permanent site immediately adjacent to the approximately 632-acre site on which the existing Plaquemines Terminal is located. The coordinates of the Project site are 29º 35' 44.5" "N, 89º 53' 06.0" W. A map showing the Project location is provided as Appendix A. Plaquemines Expansion, through an affiliate, and the Plaquemines Port Harbor & Terminal District, which is a political subdivision of the State of Louisiana, have entered into a lease option that grants all the land rights necessary

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[18] *See, e.g.*, DOE Press Release, "DOE FINALIZES 2024 LNG EXPORT STUDY, PAVING WAY FOR STRONGER AMERICAN ENERGY EXPORTS" (May 19, 2025), *available at* https://www.energy.gov/articles/doe-finalizes-2024-lng-export-study-paving-way-stronger-american-energy-exports (announcing DOE's "Response to Comments for the 2024 LNG Export Study: Energy, Economic, and Environmental Assessment of U.S. LNG Exports," (hereinafter "DOE Response to Comments"), *available at* https://www.energy.gov/sites/default/files/2025-05/2024%20LNG%20Export%20Study_Response%20to%20Comments_Final_05.19.2025.pdf).

to develop, construct, and operate the Project. A copy of this agreement, redacted to remove commercially sensitive terms, is included as Appendix B.

The new liquefaction facilities to be added in the Expansion Project consist of 16 liquefaction blocks (with two SMR trains each) capable of producing in aggregate a peak achievable capacity of up to 31 MTPA of LNG, or the approximate equivalent of 1,624.25 Bcf per year of natural gas. Thus, after completion of the Expansion Project, the combined maximum output of the Plaquemines Terminal and the Expansion Project at peak operations under optimal operating conditions will be 58.2 MTPA, or the approximate equivalent of 3,029.58 Bcf per year of natural gas. In addition to the new liquefaction facilities, the Expansion Project also will add the following major facilities to support the incremental LNG export operations: a new gas gate station; five pretreatment systems; new flare systems; boil-off, flash, and gas relief systems; two natural gas-fired combined cycle power plants, with multiple generator components, each with a generating capacity of 710 megawatts, as well as diesel emergency generators and an electric connection to the existing power plants at the Plaquemines LNG Terminal and to the local utility; and one new LNG loading berth designed to accommodate LNG vessels ranging from 120,000 to 210,000 m^3 of carrying capacity;[19] and safety and utilities systems. All of the Expansion Project facilities are described in detail in the Section 3 application to FERC for authorization to site, construct, and operate those facilities.

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[19] The new loading berth will be constructed in the Mississippi River between river mile markers 54 and 55 along the northern edge of the existing facilities and will include a 19.6-acre operational footprint. This new marine berth will be operated on an integrated basis with the three existing marine berths. All marine operations and vessels will comply with applicable U.S. Coast Guard ("USCG") requirements and maritime laws. Plaquemines Expansion filed with the USCG a Letter of Intent on March 6, 2025 and an Updated LOR on August 21, 2025 to confirm that the existing waterway can adequately accommodate the proposed additional Carrier calls per year expected with the Expansion Project. The USCG issued its approval of the additional Carrier calls on October 24, 2025.

The Expansion Project will be interconnected with the Plaquemines LNG Terminal and utilize certain of Plaquemines LNG's authorized facilities, including gas treatment, utilities, LNG storage tanks, low pressure flare, LNG loading berths, marine flare, electrical power generation, and other appurtenant facilities owned by Plaquemines LNG. The Expansion Project does not include any new LNG storage or any FERC-jurisdictional interstate pipeline facilities.[20] Given the reliance on a new intrastate pipeline to transport feed gas to the Expansion Project, Plaquemines Expansion initially will rely on gas produced in Louisiana for feed gas to be exported. After that initial period, however, it will have access, through the interconnected pipeline grid, to a wide variety of natural gas sources and production areas. By design, the Expansion Project is not dependent upon any particular natural gas supply.

Plaquemines Expansion plans to start construction of the new facilities for the Expansion Project soon after the receipt of FERC authorization and other necessary regulatory permits and approvals, and targets commencing construction in early 2027. Venture Global has a proven ability, demonstrated with both the Plaquemines Terminal itself and at Calcasieu Pass, to finance and construct LNG export facilities quickly and to supply incremental American natural gas to international markets expeditiously. To do the same with the Expansion Project, the Applicant and Plaquemines LNG requested in their recent Application to FERC that it authorize the Project within one year of the filing of the FERC application. The Applicant and Plaquemines LNG propose to construct and commission the Expansion Project facilities sequentially, with requisite implementation authorizations from FERC Staff, just as has occurred with the authorized

[20] The Project will receive natural gas via a planned new intrastate natural gas pipeline (which is not subject to FERC's NGA Section 7 jurisdiction), the Cloud Connector Pipeline, which will be constructed and operated by Cloud Connector, LLC, Inc., under the jurisdiction of the Louisiana Department of Conservation and Energy pursuant to the Louisiana Natural Resources and Energy Act of 1973.

Plaquemines Terminal facilities. Provided that construction commences in early 2027 as planned, Plaquemines Expansion is targeting first production of LNG from the Expansion Project by the end of 2028. Construction of the Expansion Project is projected to take approximately 48-months with the goal of placing all the Expansion facilities in-service, after completing commissioning, approximately five years after Commission authorization. That timeline, however, may be affected by the timing of regulatory approvals and a number of other external factors.

Plaquemines Expansion has not yet entered into any binding contracts with customers for the export of LNG from the Expansion Project. It will file all long-term, binding contracts associated with the export of LNG from the Expansion Project once executed, in accordance with established DOE/FE policy and precedent. Similarly, the Applicant has not yet entered into any long-term natural gas supply agreements, but will file such contracts once executed with the DOE/FECM in accordance with established policy and precedent.

V. AUTHORIZATIONS REQUESTED

Plaquemines Expansion requests long-term, multi-contract authorization to export domestically produced LNG of up to 1,624.25 Bcf per year of natural gas (approximately equivalent to 31 MTPA of LNG) commencing on the earlier of the date of first export or seven years from the date the requested authorization is granted by DOE/FECM.[21] Consistent with the Including Short-Term Policy Statement,[22] Plaquemines Expansion requests that its export

[21] In its orders authorizing non-LNG exports, DOE has consistently imposed the condition that the applicant must commence commercial LNG export operations no later than seven years after the issuance of the order. *E.g.*, *Venture Global Calcasieu Pass, LLC*, DOE/FE Order No. 4346, Docket No. 15-25-LNG at 75-76 (March 5, 2019); Plaquemines LNG 2019 Non-FTA Authorization at 49; *CP2 LNG* 2025 Order, *supra* n.8, at 65. *See also* DOE, Rescission of Policy Statement on Export Commencement Deadlines in Authorizations To Export Natural Gas to Non-Free Trade Agreement Countries, 90 Fed. Reg. 14,411 (Apr. 2, 20255) (modifying the standard for extensions of the standard 7-year condition).

[22] *See supra* n.3.

authorizations also allow for the export of natural gas up to the same approved volume pursuant to transactions with terms of less than two years (including commissioning volumes).

Plaquemines Expansion anticipates that it will hold title to the LNG at the time of export and sell the LNG pursuant to SPAs entered into with off-takers. Nevertheless, to maximize flexibility in its customer contracting and consistent with DOE/FECM precedent, the Applicant requests authorization to export LNG from the Expansion Project both on its own behalf and as agent for entities with which it contracts that may hold title to the LNG at the time of export. The Applicant will comply fully with all related DOE/FECM requirements for both exporters and their agents, including the registration requirements detailed in orders such as *Freeport LNG Development, L.P.* and *Gulf Coast LNG Export LLC*.[23]

Plaquemines Expansion requests a term of twenty (20) years after the commencement of commercial exports under both the requested FTA and non-FTA authorizations. As DOE began to authorize LNG exports from the lower-48 United States, it adopted a standardized 20-year term for non-FTA authorizations, which it explained as follows:

> we are mindful that LNG export facilities are capital intensive and that, to obtain financing for such projects, there must be a reasonable expectation that the authorization will continue for a term sufficient to support repayment. We find that a 20-year term is likely sufficient to achieve this result. We base that conclusion on the fact that [the applicant] has submitted to DOE/FE LTAs with 20-year terms,

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[23] *Freeport LNG Expansion, L.P. and FLNG Liquefaction, LLC*, FE Order No. 2913 (Feb. 10, 2011) (establishing the criteria for exports for agents subsequently adopted in a number of orders); *Gulf Coast LNG Export LLC*, DOE/FE Order No. 3163 at 7-8 (Oct. 16, 2012) (reiterating agency policy). Thus, if acting as an agent for others, Plaquemines Expansion will register with DOE each LNG title holder for which it will export LNG as agent. In that event, Applicant also will provide the DOE with a written statement by the title holder that acknowledges and agrees to (1) comply with all requirements in the LNG's long-term export authorization, and (2) include those requirements in any subsequent purchase or sale agreement entered into by the title holder.

> which is also the length of all LNG export contracts DOE/FE has received to date.[24]

Consistent with that approach, Plaquemines LNG's existing non-FTA export authorization originally was "for a term of 20 years to commence from the date of first commercial export, but not before."[25]

Effective August 25, 2020, DOE discontinued its prior practice of granting a standard 20-year export term for long-term authorizations to export domestically produced natural gas from the lower-48 states to non-FTA nations, adopting instead a longer term extending through December 31, 2050.[26] DOE explained the basis for the lengthened export term in part as follows:

> a 30-year export term would better match the operational life of LNG export facilities, which are typically designed for a service life of 30 to 50 years. A 30-year export term thus would provide authorization holders with greater security in financing their export facility and would maximize their ability to enter into natural gas supply and export contracts for a longer period of time…and a 30-year export term would benefit U.S. authorization holders as they compete for long-term export contracts in the global market.[27]

To support that policy DOE also recognized that a term of longer than 20 years "will provide important commercial benefits to existing and future authorization holders in the lower-48 states, while enhancing long-term regulatory certainty for both authorization holders and foreign buyers of U.S. LNG."[28] As previously explained, this standard extension of the export term through 2050 applies to Plaquemines LNG's existing export authorizations.[29]

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24 *Freeport LNG Expansion, L.P., et al.*, DOE/ FE Order No. 3282–C, Docket No. 10-161-LNG at 89 (Nov. 14, 2014).

25 Plaquemines LNG 2019 Non-FTA Authorization at 53.

26 2050 Policy Statement, *supra* n.15.

27 *Id.*, 85 Fed. Reg. at 52,240.

28 *Id.* at 52,241.

29 DOE/FE Order Nos. 3866-A and 4446-A, Docket No. 16-28-LNG (Oct. 21, 2020).

The standard duration of the export authorizations through 2050 has increased importance for the Expansion Project. While Plaquemines Expansion is targeting first LNG exports from the Project in late 2028, achievement of that goal is uncertain and subject to prompt regulatory approvals and other external factors. Furthermore, as with the prior Venture Global projects, the Expansion Project is expected to have an extended commissioning period, with the result that the commercial operations date when the long-term SPAs associated with the Project (which likely will have 20-year terms) will commence, could potentially occur after 2030. Therefore, the current generally applicable term through December 31, 2050, may result here in a term of *less than* 20-years after the long-term SPAs begin. That result would be contrary to DOE's reasoning not only in the 2050 Policy Statement extending the standard term duration, but also in its prior adoption of standardized 20-year terms. That is, a term of less than 20-years *after the commencement of commercial operations exports under long-term contracts under the requested authorization* would put the Applicant at a commercial disadvantage, particularly in competition with LNG producers elsewhere in the world, would be inconsistent with the economic life of the Expansion Project, and could present financing challenges. Accordingly, to avoid this result, the Applicant respectfully requests, for its non-FTA authorization as well as the FTA authorization, a term of 20 years after the start of commercial exports under the requested authorization..[30]

Plaquemines Expansion requests the issuance of separate orders authorizing the requested LNG exports: (1) to any country which has, or in the future develops, the capacity to import LNG via ocean-going carriers and with which the U.S. has, or in the future enters into, an FTA requiring

[30] Alternatively, should the DOE decide to develop a new policy statement extending the term of its long-term export authorizations beyond 2050 prior to acting on this Application, Venture Global would request that the terms of its non-FTA authorization and FTA authorization conform to such policy statement.

the national treatment for trade in natural gas or is otherwise deemed by the United States as being treated as an FTA nation; and (2) to any country with the capacity to import LNG via ocean-going carriers and with which the United States does not have such an FTA but with which trade is not prohibited by United States law or policy. This approach of two separate orders for exports to FTA nations and non-FTA nations follows established DOE/FECM precedent.

For the FTA authorization, Plaquemines Expansion respectfully requests that DOE/FECM issue it as soon as practicable, consistent with the statutory requirement of issuance of such authorizations without delay. For the non-FTA Authorization, the Applicant also requests issuance as soon as practicable, recognizing that additional time is required for the necessary public interest analysis.

A. EXPORT TO FREE-TRADE NATIONS

Plaquemines Expansion requests authorization to export from the Project an amount of LNG equivalent to up to 1,624.25 Bcf/yr of natural gas (approximately equal to 31 MTPA) to FTA nations. Section 3(c) of the NGA, as amended by Section 201 of the Energy Policy Act of 1992 (Pub. L. 102-486), requires that applications to authorize exports of natural gas, including LNG, to a nation with which there is in effect a free trade agreement requiring national treatment for trade of natural gas be "deemed to be consistent with the public interest" and "granted without modification or delay."[31] In addition, DOE has consistently held that the otherwise applicable

[31] 15 U.S.C. § 717b(c) ("For purposes of [15 U.S.C. § 717b(a)] of this section, the importation of the natural gas referred to in [15 U.S.C. § 717b(b)] of this section, or the exportation of natural gas to a nation with which there is in effect a free trade agreement requiring national treatment for trade in natural gas, shall be deemed to be consistent with the public interest, and applications for such importation or exportation shall be granted without modification or delay.").

regulatory requirements for public notice and other procedures set forth in 10 C.F.R. Part 590 do not apply to exports to FTA nations.[32]

In accordance with this statutory mandate, the portion of this Application that seeks to authorize exports to FTA nations should be granted without modification or delay. The DOE has consistently followed this approach in granting dozens of long-term authorizations to allow exports of natural gas to FTA nations over many years.[33] Given the mandatory standard of NGA Section 3(a), DOE/FECM is not required to engage in any analysis of factors affecting the public interest in acting on the FTA aspect of this Application, and has not done so when approving similar applications to export LNG to FTA nations. Nevertheless, further support for the requested FTA authorization is provided by the below presentation concerning the non-FTA authorization to the extent it is deemed necessary or relevant. Consistent with the established practice of DOE/FECM, the Applicant requests that the requested FTA authorization be granted initially and separately without waiting on the further public interest determination required to address the requested authorization for LNG export to non-FTA nations.

B. EXPORT TO NON-FREE-TRADE NATIONS

Plaquemines Expansion also requests authorization to export from the Project an amount of LNG equivalent to up to 1,624.25 Bcf/yr of natural gas (approximately equal to 31 MTPA) to non-FTA nations, on a non-additive basis to the FTA authorization. The non-FTA portion of the

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[32] *See, e.g., CP2 LNG* 2025 Order, *supra* n.8, at n.45; *Venture Global Plaquemines LNG, LLC*, DOE/FE Order No. 3866 at 6, n.8 (July 21, 2016); *Venture Global Calcasieu Pass, LLC*, DOE/FE Order No. 3662, Docket No. 15-25-LNG at 10, n.19 (Jun. 17, 2015).

[33] A list of orders authorizing long-term exports to FTA (and non-FTA) nations, as well as docket numbers and the links to the orders, is available on the DOE/FE website at: https://www.energy.gov/fe/downloads/summary-lng-export-applications-lower-48-states.

Application must be reviewed pursuant to the statutory standard established in NGA Section 3(a), which provides that:

> [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 [Secretary of Energy] authorizing it to do so. The [Secretary] *shall issue* such order upon application, *unless*, after opportunity for hearing, [the Secretary] finds that the proposed exportation or importation will not be consistent with the public interest.[34]

This statutory language creates a presumption that the proposed export of natural gas is in the public interest. Accordingly, DOE has consistently held that it must grant non-FTA export applications unless opponents of an application overcome this presumption by making an affirmative demonstration that the proposed export is inconsistent with the public interest.[35] This interpretation has been affirmed by the U.S. Court of Appeals for the District of Columbia Circuit.[36]

Furthermore, the DOE has recently reaffirmed, after the conclusion of a major study and its consideration of public comments on it, its long-standing conclusion that "exports of LNG from the United States are in the best interest of the American public."[37] As DOE leadership recognized in announcing that conclusion: "The facts are clear: expanding America's LNG exports is good

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[34] 15 U.S.C. § 717b(a) (2006) (emphasis added). The Secretary's authority was established by the DOE Organization Act of 1977, which transferred jurisdiction over gas import and export authorizations from the Federal Power Commission to DOE.

[35] *E.g.*, *Philips Alaska Natural Gas Corp. & Marathon Oil Co.*, DOE/FE Order No. 1473 at 13 (Apr. 2, 1999); *Sabine Pass Liquefaction, LLC*, DOE/FE Order No. 2961 at 28 (May 20, 2011); *Dominion Cove Point LNG, LP*, DOE/FE Order No. 3331-B at 11 (Apr. 18, 2016); Plaquemines LNG 2019 Non-FTA Authorization at 18-19; *Venture Global Calcasieu Pass*, *LLC*, DOE/FE Order No. 4346 at 19; *Sierra Club, et al.*, Order Denying Petition for Rulemaking on Exports of Liquefied Natural Gas, at 10 (July 18, 2023); *CP2 LNG* 2025 Order, *supra* n.8, at 26.

[36] *E.g.*, *Sierra Club v. U.S. Dep't of Energy*, 867 F.3d 189 at 203 (D.C. Cir. 2017).

[37] *See* DOE Press Release, "DOE FINALIZES 2024 LNG EXPORT STUDY, PAVING WAY FOR STRONGER AMERICAN ENERGY EXPORTS," May 19, 2025, *supra* n.18.

for Americans and good for the world…. LNG supports our economy, strengthens our allies, and enhances national security."[38] Accordingly, the DOE in the current Administration has advanced the "unleashing" of U.S. LNG exports in numerous orders, including recent ones issued for other Venture Global projects.[39] As Secretary Wright explained upon the issuance of one of those recent non-FTA authorization orders: "Today's authorization is another reminder that this administration is committed to expanding the supply of abundant, affordable, and secure American energy. The data over the past 10 years of U.S. LNG exports clearly shows that we can lead the world in energy production while lowering energy costs here at home."[40]

In authorizing long-term non-FTA exports, DOE has repeatedly and consistently explained that it "continues to subscribe to the principle set forth in our 1984 Policy Guidelines that, under most circumstances, the market is the most efficient means of allocating natural gas supplies."[41] Those 1984 Policy Guidelines to implement NGA Section 3 (which are applicable to exports as

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38 *Id.*

39 *See* DOE Press Release, *Energy Department Approves Final Export Authorization for Venture Global CP2 LNG* (Oct. 22, 2025), *available at* https://www.energy.gov/articles/energy-department-approves-final-export-authorization-venture-global-cp2-lng; DOE Press Release, DOE Issues Final Non-FTA LNG Export Authorization for Additional Exports From the Venture Global Calcasieu Pass Project (Aug. 4, 2025), *available at* https://www.energy.gov/articles/doe-issues-final-non-fta-lng-export-authorization-additional-exports-venture-global.

40 Aug. 4, 2025 DOE Press Release, *supra* n.39.

41 *E.g.*, *Freeport LNG Expansion, L.P.,* Order No. 3282 at 112 (May 17, 2013); *Lake Charles Exports*, Order No. 3324 at 125 (Aug. 7, 2013); *Dominion Cove Point LNG, LP*, Order No. 3331 at 141 (Sept. 11, 2013); *Freeport LNG,* Order No. 3357 at 154 (Nov. 15, 2013); *Cameron LNG, LLC*, DOE/FE Order No. 3391 at 132 (Feb. 11, 2014); *Jordan Cove Energy Project, L.P.*, Order No. 3413 at 143 (Mar. 24, 2014); *Oregon LNG*, Order No. 3465 at 141 (July 31, 2014); *Cheniere Marketing, LLC*, Order No. 3638 at 205 (May 12, 2015); *Sabine Pass Liquefaction, LLC*, Order No. 3669 at 210 (June 26, 2015); *Pieridae Energy (USA), LTD.*, Order No. 3768 at 216 (Feb. 5, 2016); *Bear Head LNG Corp.*, Order No. 3770 at 176 (Feb. 5, 2016); Plaquemines LNG 2019 Non-FTA Authorization at 42; *Venture Global Calcasieu Pass, LLC*, DOE/FE Order No. 4346, Docket No. 15-25-LNG at 69; *CP2 LNG* 2025 Order, *supra* n.8, at 59.

well as imports[42]) promote the free and open trade of natural gas.[43] The Policy Guidelines were "designed to establish natural gas trade on a market-competitive basis and to provide immediate as well as long-term benefits to the American economy from this trade."[44] Moreover, the Guidelines provide that:

> The market, not government, should determine the price and other contract terms of imported [or exported] gas. U.S. buyers [sellers] should have full freedom – along with the responsibility – for negotiating the terms of trade arrangements with foreign sellers [buyers]….
>
> * * *
>
> The policy cornerstone of the public interest standard [of NGA Section 3] is competition. Competitive import [export] arrangements are an essential element of the public interest, and natural gas imported [exported] under arrangements that provide for the sale of gas in volumes and at prices responsive to market demands largely meets the public interest test….[45]

As DOE has frequently explained: "The goals of the Policy Guidelines are to minimize federal control and involvement in energy markets and to promote a balanced and mixed energy resource system."[46] DOE has promoted the competitive, free-trade policies embodied in the Policy Guidelines by consistently authorizing LNG exports to non-FTA nations, in over 40 decisions issued by multiple Administrations over more than a decade for aggregate authorized exports to

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[42] *E.g., Philips Alaska*, DOE/FE Order No. 1473 at 14; *Yukon Pacific Corp.*, DOE/FE Order No. 350, 1 FE ¶ 70,259 at 71,128 (1989); *Dominion Cove Point LNG, LP*, DOE/FE Order No. 3331 at 8 (Sept. 11, 2013); *Sierra Club, et al.*, Order Denying Petition for Rulemaking on Exports of Liquefied Natural Gas, at 10 (July 18, 2023).

[43] *Policy Guidelines and Delegation Orders Relating to the Regulation of Imported Natural Gas*, 49 Fed. Reg. 6,684 (Feb. 22, 1984).

[44] *Id.*

[45] *Id.* at 6,685 and 6,687. The parenthetical references to exports are added in the above quotation to reflect the applicability of the Policy Guidelines to exports. *See supra* n.42.

[46] *E.g., Sabine Pass Liquefaction, LLC*, DOE/FE Order No. 2961 at 29 (May 20, 2011); Plaquemines LNG 2019 Non-FTA Authorization at 19; *CP2 LNG* 2025 Order, *supra* n.8, at 26-27.

non-FTA nations (were all the authorized projects actually placed in service[47]) totaling approximately 52.81 Bcf per day.[48] DOE/FECM should continue to follow its longstanding practice in granting the Application here.

While NGA section 3(a) establishes a broad public interest standard and a presumption favoring export authorizations, the statute does not define "public interest" or identify the criteria that must be considered. In its orders authorizing long-term LNG exports to non-FTA nations, DOE has been guided by DOE Delegation Order No. 0204-111, which directed that regulation of gas exports be "based on a consideration of the domestic need for the gas to be exported and such other matters as the Administrator finds in the circumstances of a particular case to be appropriate."[49] More specifically, DOE has explained that its review of export applications focuses on: (i) the domestic need for the natural gas proposed to be exported; (ii) whether the proposed exports pose a threat to the security of domestic natural gas supplies; (iii) whether the arrangement is consistent with DOE's policy of promoting market competition; and (iv) any other factors bearing on the public interest.[50]

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47 Of course, as DOE/FE has properly recognized "it is far from certain that all or even most of the proposed LNG export projects will ever be realized because of the time, complexity, and expense of commercializing, financing, and constructing LNG export terminals, as well as the uncertainties inherent in the global market demand for LNG." Term Extension Policy Statement, 85 Fed. Reg. 52,237, 52,243 (Aug. 25, 2020).

48 A list of all the non-FTA approvals with docket numbers, volumes, and links to the relevant DOE/FE orders is available at: https://www.energy.gov/fe/downloads/summary-lng-export-applications-lower-48-states. *See also Sierra Club, et al.*, Order Denying Petition for Rulemaking on Exports of Liquefied Natural Gas, at 15 (July 18, 2023); and *CP2 LNG* 2025 Order, *supra* n.8, at 58-62 (recent listing of all non-FTA authorizations and cumulative volumes).

49 DOE Delegation Order No. 0204-111 (Feb. 22, 1984) at 1 (¶ b); *see also Policy Guidelines and Delegation Orders Relating to the Regulation of Imported Natural Gas*, 49 Fed. Reg. at 6,690.

50 *See, e.g.,* Plaquemines LNG 2019 Non-FTA Authorization at 20; *Venture Global Calcasieu Pass*, *LLC*, DOE/FE Order No. 4346 at 21; *CP2 LNG* 2025 Order, *supra* n.8, at 27.

Granting Plaquemines Expansion's requested authorization to export LNG will be consistent with, and indeed advance, the public interest. The general benefits of LNG exports are well known to DOE and have been explained by it in numerous orders, as well as demonstrated in a series of studies over the years. In 2012, 2015, and again in 2018, DOE released studies assessing the macroeconomic impacts of LNG exports to inform its decisions on applications seeking authorization to export LNG to non-FTA nations.[51] The conclusions of those studies have been uniformly supportive of the public interest in LNG exports, and have been relied upon in DOE's uniform policy of authorizing non-FTA exports over many years.

In the non-FTA export authorization for Plaquemines LNG, for instance, DOE described its 2018 Study[52] in detail as part of its analysis authorizing the exports.[53] Among the "key findings" of that study highlighted in that order were the following:[54]

- "Increasing U.S. LNG exports under any given set of assumptions about U.S. natural gas resources and their production leads to only small increases in U.S. natural gas prices."
- "Increased exports of natural gas will improve the U.S. balance of trade and result in a wealth transfer into the United States."
- "Overall [U.S.] GDP improves as LNG exports increase for all scenarios with the same U.S. natural gas supply condition."
- "There is no support for the concern that LNG exports would come at the expense of domestic natural gas consumption."

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51 All three studies are available on DOE's website at: https://www.energy.gov/fecm/articles/lng-export-studies.

52 The 2018 Study is available at: https://fossil.energy.gov/app/docketindex/docket/index/10, and DOE's response to comments on it and summary of its conclusions was published in the Federal Register on December 28, 2018. *Study on Macroeconomic Outcomes of LNG Exports: Response to Comments Received on Study*, 83 Fed. Reg. 67,251 (Dec. 28, 2018).

53 *See* Plaquemines LNG 2019 Non-FTA Authorization at 7-14.

54 *Id.* at 13 (footnotes within the quotations, with citations to the 2018 Study omitted).

- "[A] large share of the increase in LNG exports is supported by an increase in domestic natural gas production."

- "Natural gas intensive [industries] continue to grow robustly at higher levels of LNG exports, albeit at slightly lower rates of increase than they would at lower levels."

In December 2024, DOE issued a new study intended as a comprehensive update of its prior LNG studies.[55] In announcing DOE's Response to Comments following public comment on the 2024 Export Study, Energy Secretary Wright said: "The facts are clear: expanding America's LNG exports is good for Americans and good for the world."[56] Principal Deputy Assistant Secretary of DOE/FECM Tala Goudarzi added that "[t]he 2024 Study confirms what our nation always knew—LNG supports our economy, strengthens our allies, and enhances national security."[57] In the DOE Response to Comments itself, DOE/FECM made the following Key Findings that are relevant to new export authorizations:

> "1. U.S domestic natural gas supply is sufficient to meet domestic and market-based global demand for U.S. natural gas (including LNG).
>
> 2. Increasing U.S. LNG exports increases U.S. GDP.
>
> 3. Higher levels of U.S. LNG exports will have a beneficial impact on the U.S. trade balance.
>
> 4. Increased LNG exports are projected to have relatively modest impacts on prices and there has not been a consistent effect of U.S. LNG exports on prices to date. The potential price impacts from increased LNG exports modeled in the 2024 Study are within the range of prices observed over the past five years, and those price

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55 *See* Notice of Availability of the 2024 LNG Export Study: Energy, Economic, and Environmental Assessment of U.S. LNG Exports and Request for Comments, 89 Fed. Reg. 104,132 (Dec. 20, 2024).

56 DOE Press Release, "DOE FINALIZES 2024 LNG EXPORT STUDY, PAVING WAY FOR STRONGER AMERICAN ENERGY EXPORTS," May 19, 2025, *supra* n.18.

57 *Id.*

> impacts are below the price increases from U.S. LNG exports modeled in DOE's 2018 LNG Export Study.
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> 5. Increased U.S. LNG exports would enhance national and energy security for the United States, as well as U.S. allies and trading partners.
>
> 6. Natural gas production and the development of natural gas export infrastructure provide economic support to the communities in which they occur, including increased levels of employment."[58]

Stating DOE/FECM's conclusion most generally, it found that "the record evidence from 2024 LNG Export Study and the public comments received support the proposition that exports of LNG from the United States will not be inconsistent with the public interest."[59]

Given this recent DOE conclusion and the findings and extensive evidence demonstrating the benefits of LNG exports provided in the DOE Response to Comments on the 2024 Study and its recent orders, Plaquemines Expansion is not submitting any additional studies to bolster this Application. Plaquemines Expansion will briefly reiterate, however, some of the key factors showing the public interest in LNG exports.

1. Natural Gas Supply Is Ample for LNG Exports, As Well As Domestic Needs

The primary focus of the DOE's public interest analysis is on the domestic need for the LNG proposed to be exported. This domestic need can be analyzed by comparing the domestic natural gas supply against natural gas demand.

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58 DOE Response to Comments, *supra* n.18, at 46-47. Other Key Findings summarized there related to environmental issues. DOE/FECM subsequently has explained on its website, however, that "in pending and future export application proceedings under NGA section 3(a), DOE will not consider the environmental analysis in the 2024 LNG Export Study or the related Response to Comments." *See* https://fossil.energy.gov/app/docketindex/docket/index/30 (citing for further discussion of this approach, *e.g.*, *Venture Global Calcasieu Pass, LLC*, DOE/FECM Order No. 4346-B, Docket No. 15-25-LNG at 12-13, 15-16, 36-38).

59 DOE Response to Comments, *supra* n.18, at 50.

Domestic natural gas resources are abundant, affordable, and sufficient to meet both the domestic consumption demand and any expected level of LNG exports, including the increased volumes proposed by Plaquemines Expansion, in the long-term. Technological developments in the natural gas industry have led to significant increases in domestically produced natural gas, especially with regard to non-conventional production of natural gas from onshore shale formations.

The tremendous growth in natural gas production in recent years is well-known. In 2005 – just before the shale gas renaissance – U.S. dry natural gas marketed production was just slightly more than 18 trillion cubic feet ("Tcf"), according to data from the U.S. Energy Information Administration ("EIA").[60] In contrast, in each of 2022, 2023, and 2024, domestic dry gas production exceeded 36.25 Tcf, *i.e.*, more than twice the 2005 production level.[61] Natural gas production has increased in 2025 to date, and is expected to do so again in 2026.[62]

The latest EIA data and projections also show U.S. natural gas production continuing to increase long-term, while domestic consumption is projected to decrease over time. The reference case in EIA's 2025 Annual Energy Outlook ("AEO 2025") projects that total U.S. dry gas production will increase to 42.04 Tcf in 2050, growing by an average amount of 0.3% per year

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60 *See* EIA Natural Gas Data, *available at* http://www.eia.gov/dnav/ng/hist/n9070us2A.htm.

61 *Id.* (showing production of about 36.25 Tcf in 2022, 37.80 Tcf in 2023, and 37.76 Tcf in 2025).

62 *See* EIA Natural Gas Monthly, *available at* https://www.eia.gov/naturalgas/monthly/ (with data through August 2024, released Oct. 31, 2025) and EIA, *Short Term Energy Outlook – October 2025* (Oct. 7, 2025), *available at* https://www.eia.gov/outlooks/steo/.

from 2025-50.[63] In contrast, EIA projects total natural gas consumption to *decrease* by an average of 0.4% per year over that time period, resulting in 2050 projected consumption of 30.16 Tcf.[64]

The growing natural gas supply surplus supports the conclusion that LNG exports remain consistent with the public interest. Notably, the projections in AEO 2025 are even more supportive of LNG exports than the AEO 2017 data that was relied upon in DOE's 2018 Study that recognized the public interest benefits of LNG exports at unconstrained levels. For example, for the year 2050, the AEO 2017 reference case projected domestic production in 2050 of nearly the same as the AEO 2025 projection (at 40.28 Tcf), but it projected total consumption of 34.52 Tcf, about 4.3 Tcf more than the latest projections.[65] DOE/FECM has repeatedly conducted this same sort of analysis, comparing the AEO 2017 to the then-current AEO data in recent orders authorizing non-FTA exports that reaffirmed the soundness of the 2018 Study,[66] as well as its even more recent orders taking into consideration the strong conclusions of the 2024 Study regarding the public interest benefits of LNG exports.[67]

At the same time that natural gas production has grown significantly, proven reserves have dramatically increased as well. EIA's latest data actually shows a slight decrease in total proved natural gas reserves for 2023 (the latest year available) compared to the record high of the prior

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63 EIA, AEO 2025, at Table 13 *Natural Gas Supply, Disposition, and Prices (Reference Case)*, *available at* https://www.eia.gov/outlooks/aeo/data/browser/#/?id=13-AEO2025&cases=ref2025&sourcekey=0.

64 *Id.*

65 *See* Table 13 for AEO 2017, *available at* https://www.eia.gov/outlooks/aeo/data/browser/#/?id=13-AEO2017&cases=ref2017&sourcekey=0.

66 *See Sabine Pass Liquefaction, LLC*, DOE/FE Order No. 4800 at 54-55 (Mar. 16, 2022); *Cheniere Marketing LLC & Corpus Christie Liquefaction, LLC*, DOE/FE Order No. 4799 at 53 (Mar. 16, 2022); *Freeport LNG Expansion, L.P.*, *et al.*, Order No. 4961 at 56-57 (March 3, 2023).

67 *E.g., CP2 LNG* 2025 Order, *supra* n.8, at 45-46.

year but remaining at 691 Tcf.[68] In comparison, EIA data showed proved reserves of 324.3 Tcf at year-end 2016 (less than half the current level), even after increasing by more than 50% over the prior decade, from a nadir of less than 200 Tcf.[69] Thus, the proved natural gas reserves have significantly increased over the period that the U.S. has been exporting LNG. This evidence further supports the conclusion that the U.S. has ample gas for both all domestic natural gas use and LNG export demand has only strengthened.

Furthermore, as a result of the increasing production and abundant reserves, domestic natural gas prices have remained relatively low as natural gas exports have increased significantly. As DOE/FECM recently explained, while price projections at the time of its 2018 Study projected a 2050 Henry Hub price of $6.40 / MMBtu, more current data projects that price to be $4.62 / MMBtu (with both prices adjusted for 2022 dollars for comparison).[70] Thus, the latest available EIA pricing data is even more supportive of LNG exports than previous data and continues to demonstrate that arguments against LNG exports based on misplaced concerns about insufficient supplies or domestic natural gas prices are baseless. As DOE explained in its Response to Comments, "[g]iven that authorizations for export extend over several decades and planning for new facilities takes several years, DOE expects that production volumes in the U.S. will increase in response to increased LNG exports, minimizing the potential for LNG exports to lead to price

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68 *See* EIA, U.S. Crude Oil and Natural Gas Proved Reserves, Year-end 2023 (released June 25, 2025), *available at* https://www.eia.gov/naturalgas/crudeoilreserves/.

69 The EIA source cited above no longer provides historical reserve data from prior to 2020. For the EIA data as of the end of 2016, and the 50% increase in the decade before that, *see* EIA, U.S. Crude Oil and Natural Gas Proved Reserves, Year-end 2016 (released Feb. 2018), at 2 (summary), *available at* https://www.ourenergypolicy.org/wp-content/uploads/2018/02/U.S.-Crude-Oil-and-Natural-Gas-Proved-Reserves.pdf.

70 *CP2 LNG* 2025 Order, *supra* n.8, at 46.

spikes."[71] Accordingly, as DOE properly concluded after intensive focus on this issue as part of the 2024 Study and comments on it:

> Increased LNG exports are projected to have relatively modest impacts on prices and there has not been a consistent effect of U.S. LNG exports on prices to date. The potential price impacts from increased LNG exports modeled in the 2024 Study are within the range of prices observed over the past five years, and those price impacts are below the price increases from U.S. LNG exports modeled in DOE's 2018 LNG Export Study.[72]

In summary, just as DOE has repeatedly and consistently found in its many long-term non-FTA export authorizations, there are adequate natural gas resources in the U.S. to meet demand associated with LNG exports as well as all domestic needs. Accordingly, granting the export authorization requested by Plaquemines Expansion to export LNG to non-FTA nations is unlikely to affect the availability of natural gas to domestic consumers or to have negative economic effects. To the contrary, the proposed LNG exports will provide net economic benefits to the U.S., regardless of the amount of LNG that is exported by others.

2. Plaquemines Expansion's Exports Will Provide Macro-Economic Benefits

Another central focus of DOE's consideration with the 2024 Study and comments on it was the macroeconomic effects of LNG exports. DOE concluded that increasing LNG exports results in an increase to U.S. GDP in all cases examined and across the range of all scenarios analyzed, with an estimated $410 billion cumulatively for the period 2020 through 2050 under the Reference case.[73] Furthermore, DOE concluded that higher levels of U.S. LNG exports will

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71 DOE Response to Comments at 18-19.

72 *Id.* at 46.

73 *Id.* at 49.

provide additional economic benefits through improvements to the U.S. trade balance, increased federal and state tax revenues, and increased jobs.[74]

Of course, DOE has consistently concluded in its non-FTA orders over many years that LNG exports will have macro-economic benefits. In issuing Plaquemines LNG's non-FTA authorization, for instance, DOE explained and embraced the conclusions of its 2018 Study regarding the macroeconomic benefits of LNG exports.[75] These conclusions about the economic benefits of LNG exports in general equally apply to the requested exports by Plaquemines Expansion for the Expansion Project, further demonstrating that it is consistent with, and indeed will promote, the public interest.

Specifically, the Expansion Project will benefit the economy by creating jobs, increasing tax revenues, and reducing the nation's trade deficit. The total estimated construction cost for the Expansion Facilities alone will be at least $18 billion, including workforce salaries and material and equipment costs, with well in excess of $3 billion of Project costs expected to be spent at locally or regionally based suppliers. The Project's construction workforce is expected to average about 4,000 people over an approximately four-year period, with the workforce rising at its peak as high as 9,000 for an approximately four-month period, with estimated average annualized salaries of approximately $100,000 excluding benefits. The construction employment and related activities will create short-term business opportunities for local suppliers and service providers and is expected to boost revenues along their supply chain, supporting job growth in related industries. The Expansion Project will provide approximately 275 permanent operational jobs at the Plaquemines Terminal, with estimated average annual salaries of $150,000 excluding benefits,

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[74] *Id.* at 48.

[75] Plaquemines LNG 2019 Non-FTA Authorization at 7-14 and 32-33.

for the life of the Project of at least 20 years. Thus, following construction, the operation of the Project will provide stable and long-term employment and economic stimulus to the local and regional areas, which will further stimulate state and regional economies.

The Expansion Project also will result in increased tax revenues for Plaquemines Parish and for the State of Louisiana during construction and operation. At the local level, the Project will generate sales tax as well as ad valorem tax. At the state and parish level, the Project will generate sales and income taxes. In summary, the Project is expected to generate about $1.8 billion in total for the Plaquemines Parish taxing authorities during the construction and 20-year operations periods, and to generate an additional $600 million in new tax revenue for the State of Louisiana. In addition to the tax revenues directly generated from workers and Project spending, the Project will have a positive impact on local economies and stimulate indirect expenditures, and the permanent jobs from the Project will generate additional socioeconomic benefits as workers purchase goods and services and pay for housing, as well as State income taxes and sales taxes as they spend a portion of their income in the Project area.

In addition, the Expansion Project will also help reduce the nation's trade deficit. Again, this benefit of LNG exports was key finding of the 2024 Study. To estimate the magnitude of this benefit, DOE recently estimated when authorizing non-FTA exports for Venture Global's CP2 LNG project that natural gas exports at that project's peak capacity (of 1,446 Bcf/yr) could reduce the trade deficit by up to approximately $9.3 billion annually based on observed average U.S. LNG export prices in 2024.[76] The Plaquemines Expansion Project, which will add about 107 percent of

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[76] *CP2 LNG* 2025 Order, *supra* n.8, at 50-51.

the peak capacity of the CP2 LNG project, would provide correspondingly proportionate benefits to the balance of trade.

3. LNG Exports Provide Geopolitical Benefits

In considering the international consequences of LNG exports in its prior orders, DOE has consistently recognized the geopolitical benefits of LNG exports. In its non-FTA authorization for Plaquemines LNG, for instance, DOE explained:

> an efficient, transparent international market for natural gas with diverse sources of supply provides both economic and strategic benefits to the United States and our allies. Indeed, increased production of domestic natural gas has significantly reduced the need for the United States to import LNG. In global trade, LNG shipments that would have been destined to U.S. markets have been redirected to Europe and Asia, improving energy security for many of our key trading partners. To the extent U.S. exports can diversify global LNG supplies and increase the volumes of LNG available globally, these exports will improve energy security for many U.S. allies and trading partners.[77]

DOE/FECM's most recent non-FTA export authorization (as of the date of this Application), issued for another Venture Global project, reached the same conclusion[78] and added the following more current observations:

- in light of the 2022 Russian invasion of Ukraine, there continue to be concerns about energy security for Europe and Central Asia, particularly given the relative share of Russian natural gas supplied to those regions until recently, with continued risk due to the now-expired agreement for the supply of Russian natural gas to Europe.[79]

- Further, the European Commission recently proposed a legally binding ban on European Union (EU) imports of Russian natural gas

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[77] Plaquemines LNG 2019 Non-FTA Authorization at 37.

[78] *CP2 LNG* 2025 Order, *supra* n.8, at 53.

[79] *Id.* at 51 (internal footnotes and citations omitted).

by the end of 2027, and signaled that, to replace Russian supplies, the EU "could import more U.S. LNG" among other measures.[80]

- Further, the United States has an increasingly important role in the EU's natural gas supply. As the agreement allowing the transit of Russian natural gas through Ukraine expired at the end of 2024, "[i]ncreasing LNG imports from trustworthy global partners is key to fully eliminating the EU's reliance on Russian fossil fuels."294 According to the EU, "[e]ach step to phase out Russian fossil fuels brings the EU closer to a more secure and sustainable energy supply."[81]

- Additionally, we take administrative notice of a report published in October 2024 by the Institute of Energy Economics, Japan (IEEJ), which found that "[g]lobal LNG demand in 2050 is projected to increase by 74% from the present level." According to the IEEJ, "[o]ne of the focal points of increasing demand is Southeast Asia's emerging markets, notably the power generation sector," and "[i]f the energy efficiency improvements assumed in these scenarios are not realized, LNG demand would increase further." Similarly, other forecasts project varying levels of global demand for LNG, with many analysts predicting moderate to significant growth in LNG demand globally, particularly driven by Asia.[82]

All of these conclusions, of course, are equally applicable to the LNG exports proposed by Plaquemines Expansion here. Accordingly, these geopolitical and energy security considerations further support the requested non-FTA authorizations. Given the worldwide need for additional gas supplies, DOE/FECM should continue here its long-standing policy of authorizing LNG exports.

4. LNG Exports Provide Environmental Benefits

Current DOE policy does not focus on environmental issues as part of its non-FTA export decisions. Nevertheless, as the issue has received focus in the past, Plaquemines Expansion

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[80] *Id.* at 52 (footnote and citation omitted).

[81] *Id.* at 53-54 (footnotes and citations omitted).

[82] *Id.* at 54 (footnotes and citations omitted).

submits that exporting natural gas also will benefit the United States internationally because it will encourage the use of more environmentally friendly natural gas for the generation of electricity as opposed to coal, diesel, or heavy fuel oil used in foreign countries.

The increased use in the U.S. of natural gas for power generation in place of coal in recent years has resulted in decreased carbon dioxide ("CO_2") emissions. For instance, between 2005 and 2019, total U.S. electricity generation increased by almost 2% while related CO_2 emissions fell by 33%. The majority of the CO_2 emissions reduction resulted from the substitution of coal with natural gas for electric generation.[83] EIA has emphasized the key role of natural gas in reducing U.S. carbon emissions.[84] Additional LNG exports from the U.S. may similarly substitute for coal, or fuel oil, usage overseas, and support the deployment of renewable energy, thereby sharing the environmental benefits of natural gas with other nations, enabling efforts to reduce CO_2 emissions.

Notably these emissions benefits have been important to some of Plaquemines LNG's long-term export customers. For instance, when Plaquemines LNG entered into large, long-term SPAs with Sinopec and CNOOC, the counter-parties publicly emphasized the contribution that

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83 EIA, "U.S. Energy-Related Carbon Dioxide Emissions," released Sept. 30, 2020, *available at* https://www.eia.gov/environment/emissions/carbon/#:~: text=EIA%20calculated%20that%20between%202005,carbon%20generation%20totaled%205%2C475%20MMmt.&text=Between%202005%20and%202019%2C%20total, CO2%20emissions%20fell%20by%2033%25.

84 *See, e.g.,* EIA, Today in Energy, "Electric power sector CO2 emissions drop as generation mix shifts from coal to natural gas" (June 9, 2021) ("Although both the increased use of renewables and the shift from coal-fired to natural gas-fired generation contributed to reductions in electric power sector CO2 emissions, the shift from coal to natural gas had a larger effect."), *available at* https://www.eia.gov/todayinenergy/detail.php?id=48296#; EIA, Today in Energy, "U.S. energy-related CO_2 emissions expected to rise slightly in 2018, remain flat in 2019" (Feb. 8, 2018) ("The underlying energy consumption trends that resulted in these changes—mainly because more electricity has been generated from natural gas than from other fossil fuels—have helped to lower the U.S. emissions level since 2005 because natural gas is a less carbon-intensive fuel than either coal or petroleum."), *available at* https://www.eia.gov/todayinenergy/detail.php?id=34872.

those U.S. gas supplies will make to China's long-term climate and carbon emission goals.[85] Similarly, the public announcement of the expanded agreements between Venture Global and PGNiG also emphasized the role of natural gas as a bridge fuel in the energy transition in Poland and the resulting decrease in carbon emissions.[86]

When DOE in 2014 issued its study of the "Life Cycle Greenhouse Gas Perspective" (which compared the greenhouse gas ("GHG") emissions from power generation in Europe and Asia using exported U.S. LNG with the GHG emissions from power generated using local hydrocarbon resources),[87] it concluded that "we see no reason to conclude that U.S. LNG exports will increase global GHG emissions in a material or predictable way."[88] DOE updated that study in 2019,[89] again comparing life cycle GHG emissions from U.S. LNG exports to regional coal and other imported natural gas for electric power generation in Europe and Asia. In its response to comments on that study issued on January 2, 2020,[90] DOE concluded that "natural gas is one part of an environmentally preferable global energy portfolio" and reiterated that the 2019 GHG Study,

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85 *See* Press Release, "Venture Global and Sinopec Announce Historic LNG Sales and Purchase Agreements," Nov. 4, 2021, *available at* https://ventureglobal.com/2021/11/04/venture-global-and-sinopec-announce-historic-lng-sales-and-purchase-agreements/; Press Release, "Venture Global LNG and CNOOC Gas & Power Announce LNG Sales and Purchase Agreements," Dec. 21, 2021, *available at* https://ventureglobal.com/2021/12/21/venture-global-lng-and-cnooc-gas-power-announce-lng-sales-and-purchase-agreements/.

86 *See* Press Release, "Venture Global LNG and PGNiG Finalize Expansion of LNG Partnership, (Sept. 2, 2021), *available at* https://ventureglobal.com/2021/09/02/venture-global-lng-and-pgnig-finalize-expansion-of-lng-partnership/.

87 DOE, DOE/NETL-2014/1649, *Life Cycle Greenhouse Gas Perspective on Exporting Liquefied Natural Gas from the United States* (May 14, 2014) (hereinafter, the "2014 GHG Study"), *available at* http://www.energy.gov/sites/prod/files/2014/05/f16/Life%20Cycle%20GHG%20Perspective%20Report.pdf.

88 *See, e.g.,* Plaquemines LNG 2019 Non-FTA Authorization at 41; *Venture Global Calcasieu Pass*, *LLC*, DOE/FE Order No. 4346, Docket No. 15-25-LNG, at 69. Identical or very similar statements regarding the 2014 GHG Study are included in numerous other DOE orders.

89 DOE, DOE/NETL-2019/2041, *Life Cycle Greenhouse Gas Perspective on Exporting Liquefied Natural Gas from the United States: 2019 Update* (Sept. 12, 2019), *available at* https://fossil.energy.gov/app/docketindex/docket/index/21.

90 *Life Cycle Greenhouse Gas Perspective on Exporting Liquefied Natural Gas From the United States: 2019 Update—Responses to Comments*, 85 Fed. Reg. 72 (Jan. 2, 2020).

like the studies before it, "supports the proposition that exports of LNG from the lower-48 states will not be inconsistent with the public interest."[91]

DOE also considered this issue in its 2024 Study, though it has subsequently decided that the issue is not relevant to its non-FTA authorizations, which will focus only on the economic and energy security aspects of the 2024 Study.[92] For completeness regarding this issue, however, Plaquemines Expansion notes DOE's conclusion that "Increased U.S. exports of LNG are more likely to displace other sources of natural gas, along with coal and oil, than to replace renewable energy" and, furthermore, that "If U.S. LNG exports more than triple from current levels and reach the model-resolved level of exports, 56.3 Bcf/d, the cumulative increase in global GHG emissions to 2050 would be no greater than 0.1%.... [and g]iven the uncertainties inherent in modeling the global energy system, DOE cannot conclude that the change in GHG emissions would be significantly different from zero."[93] Thus, lest there be any doubt on this score, these well-reasoned conclusions by DOE rebut any potential claim that GHG emissions would render LNG exports contrary to the public interest.

VI. REVIEW OF PROJECT ENVIRONMENTAL IMPACTS

As explained above, DOE/FECM has applied a categorical exclusion from NEPA in its most recent non-FTA export authorizations.[94] That approach is based on the conclusion –

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91 *Id*. at 86.

92 DOE/FECM has explained on its website that "in pending and future export application proceedings under NGA section 3(a), DOE will not consider the environmental analysis in the 2024 LNG Export Study or the related Response to Comments." *See* https://fossil.energy.gov/app/docketindex/docket/index/30 (citing for further discussion of this approach, *e.g.*. *Venture Global Calcasieu Pass, LLC*, DOE/FECM Order No. 4346-B, Docket No. 15-25-LNG at 12-13, 15-16, 36-38).

93 DOE Response to Comments, *supra* n.18*,* at 46-47.

94 *See, e.g., CP2 LNG* 2025 Order, *supra* n.8, at 13-15, 55-57; *Venture Global Calcasieu Pass, LLC*, DOE/FECM Order No. 4346-B, Docket No. 15-25-LNG, at 12-13, 15-16, 36-38; *Commonwealth LNG, LLC*, DOE/FECM Order No. 5238-A, Docket No. 19-134-LNG at 39-41 (Aug. 29, 2025).

particularly in light of the Supreme Court's holdings in *Dep't of Transportation v. Public Citizen*, 541 U.S. 752 (2004), and *Seven County Infrastructure Coalition v. Eagle County, Colorado*, 145 S.Ct. 1497 (2025) – that the only reasonable foreseeable environmental impacts associated with *DOE's decision* to authorize exports are those associated with the transportation of natural gas by marine vessel.[95] Furthermore, based on its prior analysis, DOE has concluded that "marine transport from DOE's actions does not have the potential to markedly affect the global environmental impacts associated with the commercial shipping industry," and has established a categorical exclusion from NEPA for such marine transportation given that it does not normally pose the potential for significant environmental impacts.[96] Thus, consistent with its recent practice, DOE may apply its NEPA categorical exclusion to the non-FTA portion of this Application and need not consider any other potential environmental impacts under NEPA.

In addition, Plaquemines Expansion notes that FERC will act as the lead agency for the NEPA review for the siting, construction and operation of the Expansion Project facilities, and DOE/FECM may participate in that review process as a cooperating agency if it so elects. Consistent with FERC requirements, Plaquemines Expansion, together with Plaquemines LNG, will design and construct the Expansion Project to minimize or mitigate adverse environmental impacts. The use of previously disturbed brownfield areas and partial integration with facilities and utilities at the authorized Plaquemines Terminal will serve to further reduce impacts of the

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95 *See* decisions cited in n.97.

96 See the DOE/FECM decisions in n.97 as well as DOE, National Environmental Policy Act Implementing Procedures; Final Rule, 85 Fed. Reg. 78,197 (Dec. 4, 2020) and the related Technical Support Document, Notice of Final Rulemaking, National Environmental Policy Act Implementing Procedures (10 C.F.R. Part 1021) (Nov. 2020). *See also* 10 C.F.R. Part 1021, Subpt. D, App. B, Categorical Exclusion B5.7.

Project impacts. This brownfield expansion will result in less impact to the environment than a greenfield project.

VII. APPENDICES

The following appendices are included as part of this Application:

Appendix A: Map

Appendix B: Lease Option Agreements

Appendix C: Verification

Appendix D: Opinion of Counsel

VIII. CONCLUSION

WHEREFORE, for all the foregoing reasons, Plaquemines Expansion respectfully requests that DOE/FECM authorize it to export an amount of LNG from the Expansion Project equivalent to 1624.25 billion cubic feet per year (approximately equal to 31 MTPA) to both FTA and non-FTA nations, on the terms described above, to reflect the total peak capacity under optimal conditions of the facilities to be added in the Expansion Project.

Respectfully submitted,

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