UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
HYDROCARBONS AND GEOTHERMAL ENERGY OFFICE

In the Matter of:	)	
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Venture Global Plaquemines LNG, LLC	)	**Docket No. 16-28-LNG**
	)	

APPLICATION OF VENTURE GLOBAL PLAQUEMINES LNG, LLC FOR LIMITED AMENDMENT OF 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] Venture Global Plaquemines LNG, LLC ("Plaquemines LNG" or the "Applicant") hereby submits for filing this application ("Application") to the Office of Hydrocarbons and Geothermal Energy of the DOE ("DOE/HGEO")[3] for a limited amendment of its existing long-term, multi-contract authorizations to export domestically produced liquefied natural gas ("LNG") from the Plaquemines LNG Terminal located on the west bank of the Mississippi River, near river mile marker 55, in Plaquemines Parish, Louisiana (the "Export Terminal" or "Project"). As detailed below, Plaquemines LNG requests that the authorized volume of natural gas that may be exported from its Project under its existing authorizations be

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1 15 U.S.C. § 717b (2018).

2 10 C.F.R. Part 590 (2026).

3 DOE's Office of Fossil Energy ("FE") changed its name on July 4, 2021, to the Office of Fossil Energy and Carbon Management ("FECM") and then, on November 20, 2025, FECM changed its name to the Hydrocarbons and Geothermal Energy Office ("HGEO"). Applicants herein use the acronym for the office in effect at the time of the relevant order or action discussed, or simply use the term DOE to encompass the office. Authority to regulate the import and export of natural gas under NGA Section 3 has been delegated to the Assistant Secretary for (as currently termed) HGEO, most recently pursuant to Redelegation Order No. SD-DEL-FE1-2023, issued on April 10, 2023.

increased to 1,873 billion cubic feet per year ("Bcf/yr"), which is approximately equivalent to 35.0 million metric tons per annum ("MTPA") of LNG. The requested increase in Plaquemines LNG's authorized export volumes reflects a refined analysis of the peak liquefaction capacity of the authorized Project facilities under optimal conditions and does not involve any new facilities.

Plaquemines LNG's Export 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] Plaquemines LNG is currently authorized by DOE to export 1,405.33 Bcf/yr (approximately equivalent to that 27.2 MTPA) to nations with which the United States has entered into a Free Trade Agreement requiring the national treatment of natural gas ("FTA nations").[6] Plaquemines LNG's export authorization to non-FTA nations, however, remains at 1,240 Bcf/yr (about 24 MTPA) pending DOE action on an amendment application filed by Plaquemines LNG in this docket in March 2022.[7]

Since filing that application, Plaquemines LNG has further refined and finalized the design of its Project, completed the construction of its liquefaction facilities (but not all its facilities), and began producing LNG and exporting commissioning cargos. While finalizing the design and

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[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"). In February 2025, 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").

[6] *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).

[7] *See Venture Global Plaquemines LNG, LLC*, Order No. 4446, Docket No. 16-28-LNG (Oct. 16, 2019) (hereinafter "Plaquemines LNG 2019 Non-FTA Authorization"). Plaquemines LNG's pending amendment application to increase its authorized non-FTA exports is available at: https://www.energy.gov/hgeo/venture-global-plaquemines-lng-llc-fe-dkt-no-16-28-lng.

construction of its Project, and with its experience producing LNG during the ongoing commissioning process, Plaquemines LNG has learned how to optimize the performance of its process systems to maximize the production output of its authorized facilities while maintaining safe operating conditions. As a result of that process, Plaquemines LNG has concluded that its peak liquefaction capacity under optimal conditions is significantly more than the previously authorized quantities.

Accordingly, on December 19, 2025, Plaquemines LNG filed with the FERC in its Docket No. CP26-53 an application for a limited amendment of FERC's authorization of the Plaquemines Terminal facilities to increase, without the addition of any new facilities, the Export Terminal's authorized peak liquefaction capacity achievable under optimal conditions from 27.2 MTPA to 35.0 MTPA of LNG – or from approximately 1,405.33 Bcf/yr to approximately 1,873 Bcf/yr.[8] The proposed additional increase in the peak liquefaction capacity reflects further refinements in the conditions and assumptions concerning the maximum potential output of the authorized facilities detailed in the FERC amendment and supporting technical materials. In that filing, Plaquemines LNG requested that the FERC authorize the increased peak capacity by no later than June 25, 2026.

Plaquemines LNG requests here that DOE/HGEO correspondingly increase the quantity of its total authorized volumes for export to both FTA and non-FTA nations to 1,873 Bcf per year, so as to reflect the actual peak liquefaction capacity of the Project facilities under optimal conditions.[9] All other obligations, rights, and responsibilities of the existing export authorizations,

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[8] On December 30, 2025, FERC issued public notice of this application and established a deadline for comments and interventions of January 20, 2026. That notice is available in FERC's e-Library under the referenced docket as Accession No. 20251230-3032.

[9] Thus, compared to currently authorized amounts, Plaquemines LNG requests an increase of 467.67 Bcf /yr for export to FTA nations and of 633 Bcf/yr to non-FTA nations. Of course, if DOE grants Plaquemines LNG's

including all applicable reporting requirements and other conditions, would remain the same without change. Consistent with the different standards under Section 3 of the NGA applicable to natural gas exports to FTA and non-FTA nations,[10] and with previous DOE orders, Plaquemines LNG requests that DOE/HGEO 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 Venture Global Plaquemines LNG, LLC. Plaquemines LNG is a Delaware limited liability company with its primary place of business located at 1001 19th Street North, Suite 1500, Arlington, VA 22209. Plaquemines LNG is primarily engaged in the business of developing, constructing, and operating the Export Terminal in Plaquemines Parish, Louisiana.

Plaquemines LNG is an indirect, wholly owned subsidiary of Venture Global LNG, Inc. ("Venture Global"), which is a Delaware corporation with the same principal place of business as Plaquemines LNG. Venture Global is a long-term, low-cost provider of U.S.-produced LNG sourced from resource rich North American natural gas basins to world markets. In addition to the Plaquemines LNG Export 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

previously filed and pending uprate amendment application before acting on this Amendment, the increase sought here would be 467.67 Bcf/yr for both authorizations.

[10] 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.

under construction, both of which are 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 LNG. 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 LNG 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. BACKGROUND AND UPDATE REGARDING THE PROJECT

On September 30, 2019, the FERC granted Plaquemines LNG authorization to site, construct, and operate its 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.[11] The Export Terminal facilities, as currently authorized by FERC, include, *inter alia*, 18 liquefaction blocks (each containing two Single Mixed Refrigerant 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.

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 "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.[12] Those orders authorized Plaquemines LNG to export LNG to both FTA and non-

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

[12] *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").

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).

In April 2021, Venture Global announced that KBR Inc. and the Zachry Group would partner in a new joint venture ("KZJV") to be the lead EPC contractor for the Project. 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 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 final investment decision ("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.[13] 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.[14] In total, Plaquemines LNG had entered into by that time a total of fourteen SPAs for its full 20 MTPA nameplate capacity, with 19.7 MTPA of it contracted for 20-year terms commencing

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[13] *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/.

[14] *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/.

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 these long-term SPAs have been filed by Plaquemines LNG with DOE in accordance with the requirements of its export authorizations and DOE policies.[15]

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/yr to 1,405.33 Bcf/yr, 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 Uprate Order approving Plaquemines LNG's related 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 has not yet acted on the non-FTA portion of Plaquemines LNG's requested uprate amendment.

Plaquemines LNG has spent over $20 billion in connection with the Export Terminal, is exporting commissioning cargos of LNG while work on the Export Terminal is ongoing, and has nearly completed the construction (but not the requisite and substantial completion and commissioning) of all the facilities authorized by the Order. 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

[15] 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.

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

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 as detailed in its required monthly reports to DOE. Venture Global recently publicly announced that Plaquemines LNG exported 234 commissioning cargos in 2025 and forecasted that it will export 340-371 cargos in 2026.[17]

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 Export 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 from FERC Staff to place all of its Phase 1 facilities in-service (24 liquefaction trains and related facilities) by the fourth quarter of 2026, and the remaining Phase 2 facilities in-service by mid-2027.[18]

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[17] *See* Venture Global's Fourth Quarter 2025 investor presentation, dated March 2, 2026, at 15, available at: https://s205.q4cdn.com/622838971/files/doc_financials/2025/q4/VG-Quarterly-Investor-Presentation_4Q2025_vF.pdf.

[18] 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.

On November 17, 2025, Plaquemines LNG together with its affiliate Plaquemines Expansion, LLC filed with FERC an NGA Section 3 application for the Plaquemines Expansion Project, requesting authorization for the siting, construction, and operation of new facilities to be located adjacent to the site of the existing Export Terminal. That application is pending before the Commission in Docket No. CP26-27. That same day, Plaquemines Expansion, LLC filed with DOE an application for new export authorization in connection with the Plaquemines Expansion Project, which is pending in Docket No. 25-143-LNG. This Application for an amendment of Plaquemines LNG's existing export authorizations related to its previously authorized facilities is entirely unrelated to the new Expansion Project and does not depend on the Expansion Project in any way.

IV. BASIS FOR INCREASED OUTPUT FROM EXISTING FACILITIES

The liquefaction capacity of an LNG Terminal is dependent on a number of variables, including ambient temperatures; during colder months, the production capacity is expected to be as much as 10% higher than during summer months. The composition of feed gas also significantly affects liquefaction capacity. In addition, Terminals are designed to assume a certain number of days of maintenance, or other planned and unplanned downtime, and still achieve the design annual liquefaction capacity. In certain years, Plaquemines LNG expects that it will likely require less down-time than was assumed in the Project design – resulting in an increase in its actual annual liquefaction production in those years compared to the nameplate capacity.

Recognizing such factors, Plaquemines LNG originally estimated when it commenced the FERC process in 2015, based on pre-Front End Engineering and Design ("pre-FEED") studies, that the Project's peak liquefaction capability under optimal conditions would be 24.0 MTPA, as initially authorized by both FERC and DOE. Subsequently, as the design of the Project progressed further, Plaquemines LNG recognized that its planned facilities would have greater output than

previously projected, leading to its March 2022 request for approval of an increase in the authorized peak liquefaction capability to 27.2 MTPA, as approved by FERC in its Uprate Order and by DOE when it increased Plaquemines LNG's authorized volumes for exports to FTA nations (though not yet for non-FTA exports).

FERC has repeatedly recognized, in the Uprate Order for Plaquemines LNG and numerous other similar cases: (1) that calculating the maximum or peak capacity of a given set of liquefaction facilities may not be possible at the time an initial application for construction is filed; and (2) it is appropriate for an ultimate authorization to reflect the maximum or peak capacity, as such a level represents the actual potential production of LNG.[19] Similarly, DOE has frequently increased authorized non-FTA export volumes for other projects following FERC's approval of comparable "uprate" applications increasing the authorized peak output with no change in facilities.[20]

In the nearly four years since its applied for its prior uprate amendment, Plaquemines LNG further refined and finalized the design of its Project, completed the construction of its liquefaction facilities (but not all facilities), and began producing LNG and exporting commissioning cargos. Plaquemines LNG produced its first LNG from its initial liquefaction block in December 2024 and brought all 18 of its liquefaction blocks online sequentially over the course of 2025, with the last one commencing LNG production in late October. While finalizing the design and construction of its liquefaction facilities, and with its experience producing LNG during the ongoing

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[19] Uprate Order at P 13. *See also, e.g., Sabine Pass Liquefaction, LLC*, 146 FERC ¶ 61,117 at P 12 (2014); *Freeport LNG Development, L.P., et al*., 156 FERC ¶ 61,019 at P 13 (2016); *Magnolia LNG LLC*, 171 FERC ¶ 61,231 at P 8 (2020); *Golden Pass LNG Terminal LLC*, 174 FERC ¶ 61,053 at P 9 (2021); *Corpus Christi Liquefaction, LLC*, 177 FERC ¶ 61,029 at P 7 (2021); *Sabine Pass Liquefaction, LLC*, 177 FERC ¶ 61,030 at P 9 (2021).

[20] *See Cheniere Marketing LLC & Corpus Christie Liquefaction, LLC,* DOE/FECM Order No. 4799 (Mar. 16, 2022); *Sabine Pass Liquefaction, LLC*, DOE/FECM Order No. 4800 (Mar. 16, 2022); *Golden Pass LNG Terminal LLC*, DOE/FECM Order No. 3978 (Apr. 27, 2022); *Magnolia LNG LLC*, DOE/FECM Order No. 3909-C (Apr. 27, 2022); *Freeport LNG Expansion, L.P., et al.*, DOE/FECM Order No. 4961 (Mar. 3, 2023); *Venture Global Calcasieu Pass, LLC*, DOE/FECM Order No. 4346-B (Aug. 4, 2025).

commissioning process, Plaquemines LNG has learned how to optimize the performance of its process systems to maximize the production output of its authorized facilities while maintaining safe operating conditions. Plaquemines LNG has also continued to work with experts at its lead EPC contractor KZJV, as well as its equipment suppliers, to refine its facility design and operations to safely maximize the optimal peak output. As a result of that process, Plaquemines LNG has now concluded that its peak liquefaction capacity under optimal conditions is actually 35.0 MTPA, which is approximately equivalent to 1,873 Bcf/yr.

Plaquemines LNG demonstrated this increased peak liquefaction output in technical materials submitted with its amendment application filed with FERC on December 19, 2025. In addition to new potential optimal ambient air temperatures and gas composition scenarios, other primary factors contributing to the increased achievable peak LNG production capacity include, but are not limited to: control system refinements; maintenance program improvements that minimize downtime and maximize the benefits of the sparing capacity inherent in the Export Terminal's design; and various enhancements to production and workflow processes that Plaquemines LNG has developed and implemented to increase maximum production while maintaining safe operating conditions.

Plaquemines LNG emphasizes that this increased peak LNG production capacity does not require the construction of any new facilities or the material modification of any existing facilities. Furthermore, the increased LNG production at peak levels will not alter the conclusions of the hazard analysis for the Project previously reviewed and approved by FERC and the Pipeline and Hazardous Materials Safety Administration ("PHMSA"), or otherwise adversely affect its conformance with applicable safety requirements.[21] More generally, Plaquemines LNG can

[21] As Plaquemines LNG recognized in its recent FERC amendment application, the final determination of whether the Export Terminal complies with federal regulations of 49 C.F.R. Part 193 is made by PHMSA.

achieve this peak LNG production while remaining in full compliance with all applicable regulatory requirements, including both its current air permits[22] and U.S. Coast Guard ("USCG") authorizations.[23] In addition, this increased peak LNG production capacity will have no impact on the schedule to commission and complete the Plaquemines Terminal.

V. AUTHORIZATIONS REQUESTED

Consistent with its recent amendment application with FERC, Plaquemines LNG requests here that DOE/HGEO increase the quantity of its total authorized export volumes to 1,873 Bcf/yr for both FTA and non-FTA nations, so as to reflect the actual peak liquefaction capacity of the Project facilities under optimal conditions. The requested volume of authorized exports will be, as compared to currently authorized amounts, an increase of 467.67 Bcf/yr for export to FTA nations and of 633 Bcf/yr to non-FTA nations. Of course, if DOE grants Plaquemines LNG's previously filed and pending uprate amendment application before acting on this Amendment, the increase sought here would be 467.67 Bcf/yr for both FTA and non-FTA authorizations. All other

Accordingly, Plaquemines LNG has notified PHMSA Staff of its recent FERC filing and will work with PHMSA Staff to address any questions that they may have and to confirm that the Project continues to meet all of PHMSA's siting requirements.

[22] Plaquemines LNG holds a Prevention of Significant Deterioration ("PSD") Permit No. PSD-LA-808 (M3) and a Title V Operating Permit No. 2240-00443-V3.

[23] The Letter of Recommendation and Follow-on Waterway Suitability Assessment ("WSA") originally issued for the Project by the USCG explained that an average of 6 LNG carrier visits to the Terminal were projected per week (or approximately 310 per year), and considered an upper bound of between of three hundred and forty (340) and of three hundred and eighty (380) port calls per year of average LNG carrier sizes. In connection with Plaquemines LNG's prior applications to increase the peak liquefaction capacity of its facilities to 27.2 MTPA, the U.S. Coast Guard confirmed that the potential increase in ship traffic is still within the upper limit of 380 LNG carriers. Earlier this year, Plaquemines LNG submitted an updated Letter of Intent and an updated WSA to the USCG requesting approval to increase the number of LNG carrier calls to the Terminal to 950 LNG carrier visits per year. The USGC approved that request by letter dated October 24, 2025 (which is included in the recent FERC amendment application). Notably, the recent approval by the USCG of up to 950 annual carrier visits is more than sufficient to cover the export of LNG covered by the prior uprate Order, this proposed uprate Amendment, and the unrelated Plaquemines Expansion project (for which applications are pending before DOE in Docket No. 25-143-LNG and before FERC in its Docket No. CP26-27).

obligations, rights, and responsibilities of the existing export authorizations, including all applicable reporting requirements and other conditions, would remain the same without change.

Plaquemines LNG requests the issuance of separate orders authorizing the requested increased quantity of 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 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 precedent. Plaquemines LNG respectfully requests that DOE/HGEO issue the amended FTA authorization 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 LNG requests that its existing authorization to export LNG from the Project to FTA nations be increased to an amount of LNG equivalent to up to 1,873 Bcf/yr of natural gas (approximately equal to 35 MTPA). 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."[24] In addition, DOE has consistently held that the otherwise applicable 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.[25]

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.[26] Given the mandatory standard of NGA Section 3(a), DOE/HGEO 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 DOE's established practice, 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, and as soon as possible in light of FERC's on-going processing of the related application filed with it.

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[24] 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.").

[25] *See, e.g., Venture Global CP2 LNG, LLC*, DOE/FECM Order No. 4812, at 9, n.45 (Apr. 22, 2022); *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 (June 17, 2015).

[26] 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.

B. EXPORT TO NON-FREE-TRADE NATIONS

Plaquemines LNG also requests authorization to export from the Project an amount of LNG equivalent to up to 1,873 Bcf/yr of natural gas (approximately equal to 35 MTPA) to non-FTA nations, on a non-additive basis to the FTA authorization. The non-FTA portion of the 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.[27]

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.[28] This interpretation has been affirmed by the U.S. Court of Appeals for the District of Columbia Circuit.[29]

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[27] 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.

[28] *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 (Mar. 5, 2019); *Sierra Club, et al.*, Order Denying Petition for Rulemaking on Exports of Liquefied Natural Gas, at 10 (July 18, 2023); *Venture Global CP2 LNG, LLC*, DOE/FECM Order No. 5264-A, Docket No. 21-131-LNG, at 26 (Oct. 21, 2025) (hereinafter "*CP2 LNG* 2025 Order").

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

The current Presidential Administration, and DOE as part of it, has strongly supported LNG exports, recognizing that they advance the public interest.[30] Importantly, the DOE last May 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."[31] As DOE leadership recognized in announcing that conclusion: "The facts are clear: expanding America's LNG exports is good for Americans and good for the world…. LNG supports our economy, strengthens our allies, and enhances national security."[32] Accordingly, the DOE in the current Administration has advanced the "unleashing" of U.S. LNG exports in numerous orders, including those issued last year for other Venture Global projects.[33] 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

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[30] 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 has since expeditiously moved forward with "unleashing" LNG exports.

[31] *See* DOE Press Release, "DOE FINALIZES 2024 LNG EXPORT STUDY, PAVING WAY FOR STRONGER AMERICAN ENERGY EXPORTS" (May 19, 2025), 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).

[32] *Id.*

[33] *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.

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."[34]

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."[35] Those 1984 Policy Guidelines to implement NGA Section 3 (which are applicable to exports as well as imports[36]) promote the free and open trade of natural gas.[37] 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."[38] 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]….
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> * * *

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[34] Aug. 4, 2025 DOE Press Release, *supra* n.33.

[35] *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.28, at 59; *Corpus Christi Liquefaction, LLC*, *et al.*, Order No. 5391 at 52 (Feb. 26, 2026).

[36] *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).

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

[38] *Id.*

> 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….[39]

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."[40] 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 non-FTA nations (were all the authorized projects actually placed in service[41]) totaling approximately 52.81 Bcf per day.[42] DOE/HGEO 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

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[39] *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.36.

[40] *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.28, at 26-27; *Corpus Christi Liquefaction, LLC, et al.*, Order No. 5391 at 21 (Feb. 26, 2026).

[41] 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).

[42] 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.28, at 58-62 (recent listing of all non-FTA authorizations and cumulative volumes).

other matters as the Administrator finds in the circumstances of a particular case to be appropriate."[43] 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.[44]

Granting Plaquemines LNG's request to increase its authorized quantity of LNG exports will be consistent with, and indeed advance, the public interest. DOE has already authorized exports of LNG to non-FTA nations by Plaquemines LNG as not inconsistent with the public interest in the Plaquemines LNG 2019 Non-FTA Authorization. Authorizing an increase in the export volumes from the same facilities, to reflect a refined analysis of their peak output, should be authorized for the same reasons as the original authorization. This approach is consistent with DOE's prior approvals following a FERC-authorized uprate of the output of other LNG Terminals.[45]

Furthermore, 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.[46] The conclusions of those studies have been uniformly supportive of the public

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[43] 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.

[44] *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.28, at 27.

[45] *See supra* n.20.

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

interest in LNG exports, and have been relied upon in DOE's uniform policy of authorizing non-FTA exports over many years.

When it previously authorized non-FTA exports by Plaquemines LNG, for instance, DOE described its 2018 Study[47] in detail as part of its analysis authorizing the exports.[48] Among the "key findings" of that study highlighted in that order were the following:[49]

- "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."
- "[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.[50] 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

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47 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).

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

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

50 *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).

LNG exports is good for Americans and good for the world."[51] The then-Principal Deputy Assistant Secretary of DOE/FECM added that "[t]he 2024 Study confirms what our nation always knew—LNG supports our economy, strengthens our allies, and enhances national security."[52] 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 impacts are below the price increases from U.S. LNG exports modeled in DOE's 2018 LNG Export Study.
>
> 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."[53]

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[51] DOE Press Release, "DOE FINALIZES 2024 LNG EXPORT STUDY, PAVING WAY FOR STRONGER AMERICAN ENERGY EXPORTS," May 19, 2025, *supra* n.31.

[52] *Id.*

[53] DOE Response to Comments, *supra* n.31, 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 (10/7/2025 Update, 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).

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."[54]

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, little additional support is required to bolster this Application. Nevertheless, Plaquemines LNG will briefly reiterate 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.

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 for export by Plaquemines LNG, 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

[54] DOE Response to Comments, *supra* n.31, at 50.

Administration ("EIA").[55] In contrast, in each of the years 2022-2025, domestic dry gas production exceeded 36.25 Tcf, *i.e.*, more than twice the 2005 production level.[56] Natural gas production grew significantly in 2025, and that growth is expected to continue in 2026 and 2027.[57]

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 from 2025-50.[58] 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.[59]

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.[60] DOE has repeatedly conducted this same sort of analysis, comparing the AEO 2017 to the then-current AEO data in orders authorizing non-FTA exports

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

[56] *Id.* (showing production of about 36.25 Tcf in 2022, 37.65 Tcf in 2023, 37.76 Tcf in 2024, and 39.31 in 2025).

[57] *See* EIA Natural Gas Monthly, *available at* https://www.eia.gov/naturalgas/monthly/ (with historic data through December 2025, released Feb. 27, 2026) and, with regard to projected continued growth, EIA, *Short Term Energy Outlook – February 2026* (Feb. 5, 2026), *available at* https://www.eia.gov/outlooks/steo/.

[58] 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.

[59] *Id.*

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

that reaffirmed the soundness of the 2018 Study,[61] 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.[62]

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 year but remaining at 691 Tcf.[63] 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.[64] Furthermore, the most recent report on natural gas resources in the U.S. by the Potential Gas Committee issued in September 2025 concludes that the U.S. currently has 3,871 Tcf of total technically recoverable natural gas resources (an increase of about 16% over the previous 2022 year-end assessment), and that the total U.S. future natural gas supply, including both reserves and resources, stands at a record 4,562 Tcf.[65] 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.

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61 *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 (Mar. 3, 2023).

62 *E.g., CP2 LNG* 2025 Order, *supra* n.28, at 45-46; *Corpus Christi Liquefaction, LLC, et al.*, Order No. 5391 at 40-41 (Feb. 26, 2026).

63 *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/.

64 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.

65 For slides from the press conference announcing the Potential Gas Committee report, see https://www.aga.org/wp-content/uploads/2025/09/Roberts_PGC_Press_Conference_2025-002.pdf.

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 has 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).[66] 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 spikes."[67] 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.[68]

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 increased

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66 *CP2 LNG* 2025 Order, *supra* n.28, at 46; *Corpus Christi Liquefaction, LLC*, *et al.*, Order No. 5391 at 41 (Feb. 26, 2026).

67 DOE Response to Comments, *supra* n.31, at 18-19.

68 *Id.* at 46.

volume of authorized exports requested by Plaquemines 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 LNG's Increased 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.[69] Furthermore, DOE concluded that higher levels of U.S. LNG exports will provide additional economic benefits through improvements to the U.S. trade balance, increased federal and state tax revenues, and increased jobs.[70]

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.[71] These conclusions about the economic benefits of LNG exports in general equally apply to the requested increase in exports by Plaquemines LNG, further demonstrating that it is consistent with, and indeed will promote, the public interest.

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69 *Id.* at 49.

70 *Id.* at 48.

71 Plaquemines LNG 2019 Non-FTA Authorization at 7-14 and 32-33.

As previously stated, Plaquemines LNG has spent over $20 billion in connection with the Export Terminal. To date, Plaquemines LNG and its contractors have paid more than $500 million in sales taxes to Louisiana Parish tax authorities and to the state of Louisiana. The substantial majority of these sales taxes have been paid to Plaquemines Parish taxing entities, and this has enabled them to provide their staff with multiple pay and benefits raises; to plan (and fund) the construction of new schools; and to provide other important services to Parish residents. Relatedly, Louisiana Economic Development ("LED"), an agency of the Louisiana state government, estimates that Plaquemines LNG will pay approximately $1.1 billion in property taxes to Plaquemines Parish taxing entities during the project's operations. LED also estimates that Plaquemines LNG will create approximately 1,400 new jobs, including approximately 400 direct jobs at the Plaquemines LNG facility. To date, Plaquemines LNG has hired more than 400 employees at the facility, with an average compensation exceeding $100,000 per year.

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 prior 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.[72]

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

In its recent non-FTA export authorization issued for another Venture Global project, DOE reached the same conclusion[73] 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.[74]

- Further, the European Commission recently proposed a legally binding ban on European Union (EU) imports of Russian natural gas by the end of 2027, and signaled that, to replace Russian supplies, the EU "could import more U.S. LNG" among other measures.[75]

- 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." 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."[76]

- 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.[77]

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73 *CP2 LNG* 2025 Order, *supra* n.28, at 53.

74 *Id.* at 51 (internal footnotes and citations omitted).

75 *Id.* at 52 (footnote and citation omitted).

76 *Id.* at 53-54 (footnotes and citations omitted).

77 *Id.* at 54 (footnotes and citations omitted).

DOE/HGEO included these same observations again in its most recent non-FTA order.[78] All of these conclusions, of course, are equally applicable to the increased volume of LNG exports proposed by Plaquemines LNG 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 LNG 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.[79] EIA has emphasized the key role of natural gas in reducing U.S. carbon emissions.[80] Additional LNG exports from the U.S. may similarly substitute

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[78] *Corpus Christi Liquefaction, LLC*, *et al.*, Order No. 5391 at 45-48 (Feb. 26, 2026).

[79] 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.

[80] *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

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 those U.S. gas supplies will make to China's long-term climate and carbon emission goals.[81] 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.[82]

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),[83] it concluded that "we see no reason to conclude that U.S. LNG exports

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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.

81 *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/.

82 *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/.

83 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.

will increase global GHG emissions in a material or predictable way."[84] DOE updated that study in 2019,[85] 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,[86] DOE concluded that "natural gas is one part of an environmentally preferable global energy portfolio" and reiterated that the 2019 GHG Study, 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."[87]

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.[88] For completeness regarding this issue, however, Plaquemines LNG 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

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84 *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.

85 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.

86 *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).

87 *Id*. at 86.

88 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).

different from zero."[89] 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

Plaquemines LNG does not propose any new facilities or construction in connection with this Amendment or its related filing with FERC to increase the authorized peak output of its existing facilities. Accordingly, related authorizations will not constitute a major federal action significantly affecting the quality of the human environment within the meaning of the National Environmental Policy Act of 1969, 42 U.S.C. § 4321, *et seq*. ("NEPA").

In addition, DOE has applied a categorical exclusion from NEPA in its most recent non-FTA export authorizations.[90] That approach is based on the conclusion – particularly in light of the Supreme Court's holdings in *Department 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 reasonably foreseeable environmental impacts associated with *DOE's decision* to authorize exports are those associated with the transportation of natural gas by marine vessel.[91] 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

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89 DOE Response to Comments, *supra* n.31, at 46-47.

90 *See, e.g., Corpus Christi Liquefaction, LLC*, *et al.*, Order No. 5391 at 50-51 (Feb. 26, 2026); *CP2 LNG* 2025 Order, *supra* n.28, 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).

91 *See* decisions cited in n.90.

significant environmental impacts.[92] 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 its most recent non-FTA order, DOE/HGEO after its application of this categorical exclusion added the following observation:

> Assuming, arguendo, both that DOE has authority to consider all of the environmental effects that Sierra Club asserts, and such effects are reasonably foreseeable from an authorization and require consideration by DOE, we still would determine that [the applicant's] proposed exports are consistent with the public interest Congress seeks to advance through NGA section 3(a). Weighing the findings of the Technical Support Document, the actions of other federal and state agencies to regulate, permit, and mitigate environmental impacts such as those cited by Sierra Club, and the findings of DOE's past life cycle analyses, against the economic, energy security, and other factors favoring authorization, we find that [the applicant's] requested non-FTA exports will advance the public interest.[93]

This same arguendo conclusion applies equally to the increased exports proposed by Plaquemines LNG here.

VII. APPENDICES

The following appendices are included as part of this Application:

Appendix A: Verification

Appendix B: Opinion of Counsel

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[92] See the DOE/FECM decisions in n.90 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.

[93] *Corpus Christi Liquefaction, LLC*, *et al.*, Order No. 5391 at 51 (Feb. 26, 2026)(internal footnotes and citations omitted).

VIII. CONCLUSION

WHEREFORE, for all the foregoing reasons, Plaquemines LNG respectfully requests that DOE/HGEO grant this application and increase the authorized volume of natural gas that may be exported from its Project under its existing authorizations to 1,873 Bcf/yr, which is approximately equivalent to 35.0 MTPA of LNG, to reflect a refined analysis of the peak liquefaction capacity of the authorized Project facilities under optimal conditions.

Respectfully submitted,

/s/ J. Patrick Nevins

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Dated: March 5, 2026

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing document upon each person designated on the official service list compiled for this proceeding in accordance with 10 C.F.R. Section 590.107.

Dated at Washington, D.C., this 5th day of March, 2026.

/s/ J. Patrick Nevins

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