

FERGAS

From: Neil P. Osnato <neil@persistenceanalyticsgroup.com>
Sent: Monday, July 6, 2026 1:29 AM
To: FERGAS
Cc: Wade, Jennifer L.; Ulrey, Peri; Kroutil, Katia; vdegaryfas@next-decade.com; pnielson@next-decade.com; ltonery@orrick.com; mjohnston@orrick.com; jacob.cunningham@orrick.com; annakaterina.simon@orrick.com
Subject: [EXTERNAL] Docket No. 26-67-LNG — Rio Grande LNG Train 6 / Implementation-Assumption Verification Comment

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Receipt Acknowledged - Jeny J.

To the U.S. Department of Energy
Hydrocarbons and Geothermal Energy Office Office of Global Energy Security

Re: Docket No. 26-67-LNG — Rio Grande LNG Train 6, LLC Application for Long-Term Authorization to Export LNG to Non-Free Trade Agreement Nations

Persistence Analytics Group LLC respectfully submits this comment regarding Rio Grande LNG Train 6, LLC's application for long-term authorization to export domestically produced liquefied natural gas to Non-Free Trade Agreement nations.

PAG is a national security and infrastructure risk analytics firm focused on implementation-assumption verification, decision assurance, grid stress, load integrity, energy security, and public-cost exposure.

PAG does not submit this comment from an anti-LNG position.

Rather, PAG submits that a long-duration LNG export authorization extending potentially through December 31, 2050, or twenty years from first commercial export, should be evaluated through a clear implementation-verification lens.

The application requests authorization to export approximately 312.05 Bcf per year of domestically produced natural gas from the proposed Rio Grande LNG Expansion Project, located at and adjacent to the previously authorized Rio Grande LNG Terminal along the Brownsville Ship Channel in Cameron County, Texas. The Project would include a sixth liquefaction train, a new marine jetty, and associated facilities.

This is not only an export-volume proceeding.

It is a long-term national-security, energy-security, infrastructure-readiness, maritime-access, domestic-cost, supply-chain, and public-interest proceeding.

The core question DOE should require the record to answer is:

What assumptions must be verified before DOE authorizes long-term LNG export capacity at this scale?

PAG respectfully recommends that DOE's public-interest review include an implementation-assumption verification screen addressing at least the following:

1. Domestic Gas Supply Durability

What evidence supports the assumption that domestic natural gas supply remains sufficient through the authorization period while meeting U.S. consumer, industrial, power-sector, and national-security needs?

2. Domestic Price and Consumer Exposure

What evidence supports the assumption that incremental exports will not materially increase energy costs for U.S. households, manufacturers, power generators, and strategically important industries?

3. Feedgas and Pipeline Deliverability

What evidence verifies that feedgas supply, Bay Runner Pipeline deliverability, upstream sourcing, and operational constraints can support the Project under normal and stressed conditions?

4. Brownsville Ship Channel and Maritime Risk

What evidence verifies that port, channel, marine jetty, shipping, safety, security, emergency-response, and vessel-traffic assumptions can hold as the terminal expands?

5. National-Security and Allied-Energy Value

What evidence supports the claimed allied energy-security benefit, and how should DOE evaluate destination flexibility, title-transfer arrangements, resale provisions, and end-market transparency over the life of the authorization?

6. Global Demand Durability

What evidence supports the assumption that global LNG demand, pricing, contracting structures, and geopolitical conditions will remain durable through 2050?

7. Construction and Execution Risk

What milestones, supply-chain dependencies, labor availability, equipment constraints, financing conditions, and EPC assumptions must hold for the Project to reach construction, commissioning, and commercial export on the timeline proposed?

8. Community and Public-Cost Exposure

What costs, risks, and obligations could shift to local communities, emergency responders, infrastructure systems, taxpayers, ratepayers, or public agencies if assumptions fail?

9. Environmental and Emergency-Response Readiness

What evidence verifies that claimed limited environmental impacts, brownfield siting, mitigation, and emergency-response assumptions remain valid under expanded operations?

10. Downside Ownership

If domestic cost, maritime risk, construction delay, infrastructure burden, or end-market assumptions fail, who bears the downside?

PAG respectfully submits that DOE should not treat these questions as opposition to LNG exports. They are public-interest verification questions.

The application itself relies on assumptions concerning domestic supply, price impacts, allied energy security, job creation, tax benefits, trade balance, environmental impacts, and public interest. Those assumptions may be valid. But for a long-term authorization of this scale, they should be explicitly verified in the record before obligations harden.

Energy security is not only production.

It is verified supply, verified deliverability, verified infrastructure readiness, verified cost allocation, verified end-market transparency, and verified resilience under stress.

PAG recommends that DOE require the decisional record to identify:

- which public-interest assumptions are supported by evidence;
- which assumptions remain exposed;
- what documentation or controls are missing;
- what dependencies must hold;
- who bears downside if assumptions fail; and
- what should be verified before final authorization is granted.

