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Comment On: DOE-HQ-2026-0859-0001

Importation or Exportation of Liquefied Natural Gas or Electric Energy; Applications, Authorizations, etc.: Port Arthur LNG, LLC

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Comment on FR Doc # 2026-11228

Submitter Information

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General Comment

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

Re: Docket No. 26-50-LNG — Port Arthur LNG, LLC Application for Blanket Authorization to Export Previously Imported LNG

Persistence Analytics Group LLC respectfully submits this comment regarding Port Arthur LNG, LLC's request for short-term blanket authorization to export previously imported, foreign-sourced liquefied natural gas from the Port Arthur LNG Terminal.

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

PAG is not opposing Port Arthur LNG's request.

The issue is that even a limited re-export authorization depends on implementation assumptions that should be verified before DOE grants authority involving non-FTA exports, title-transfer flexibility, maritime movement, and start-up operations.

DOE should evaluate the application through a practical implementation-verification framework.

The core question is:

What evidence proves that this authorization will remain limited to previously imported, foreign-sourced

LNG used for cooldown cargoes during start-up, and that the public-interest assumptions will hold during execution?

PAG respectfully recommends that DOE address the following verification issues before issuing a final order:

1. Source and Title Verification

What evidence will verify that exported LNG is previously imported, foreign-sourced LNG, rather than domestically produced LNG or commingled volumes that are not clearly attributable?

2. Volume Control

What controls will verify that exports do not exceed the requested cumulative authorization equivalent to 20 billion cubic feet of natural gas over the two-year authorization period?

3. Cooldown Cargo Limitation

What operational records will demonstrate that the LNG was used for start-up cooldown activities and that the re-export is tied to that stated operational purpose?

4. Non-FTA Public-Interest Review

Because the request includes authority to export to non-FTA countries, DOE should identify the assumptions supporting its public-interest determination and whether any destination, market, or geopolitical considerations require additional review.

5. Maritime and Port Readiness

What assumptions are being made regarding vessel availability, marine terminal readiness, port operations, safety procedures, emergency response, and coordination with relevant federal, state, and local authorities?

6. Chain-of-Custody and Auditability

What records will allow DOE to audit import, storage, use, title transfer, and export of the LNG, including any exports conducted as agent for other entities holding title at the time of export?

7. Environmental and NEPA Assumptions

DOE should ensure that the environmental analysis adequately reflects the operational reality of import, cooldown, storage, handling, and re-export activity, rather than treating the authorization only as an administrative transaction.

8. Downside Ownership

If assumptions fail — including source verification, export tracking, safety performance, title clarity, environmental impacts, or public-interest reliance — who bears the responsibility and cost?

This docket is narrow, but it is still part of a broader national energy-security issue.

The United States is increasingly relying on LNG infrastructure not only for domestic energy production, but also for allied supply, maritime logistics, project finance, geopolitical leverage, and global energy-market flexibility.

That means DOE's authorization record should verify the implementation assumptions before reliance hardens.

Trust the re-export purpose. Verify the execution.

Respectfully submitted,

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