RECEIVED
By Docket Room at 4:28 pm, Nov 20, 2026

BLANKROME
1825 Eye Street NW | Washington, DC 20006
blankrome.com

Phone: (202) 420-2656
Fax: (202) 379-9027
Email: brett.snyder@blankrome.com

November 20, 2026

BY ELECTRONIC FILING

Ms. Amy Sweeney, Director
Office of Global Energy Security
Hydrocarbons and Geothermal Energy Office
EX-34
1000 Independence Ave. S.W.
Washington, DC 20585

Re: Cameron LNG, LLC, Docket Nos. 11-145-LNG, 11-162-LNG, 14-204-LNG, 15-36-LNG, 15-67-LNG, 15-90-LNG
ECA Liquefaction, S. de R.L. de C.V., Docket No. 18-144-LNG
Energía Costa Azul, S. de R.L. de C.V., Docket No. 18-145-LNG
Port Arthur LNG, LLC, Docket Nos. 15-53-LNG, 15-96-LNG, 18-162-LNG, 26-47-LNG, 26-50-LNG
Port Arthur LNG Phase II, LLC, Docket No. 20-23-LNG
Sempra Gas & Power Marketing, LLC, Docket No. 26-45-NG
Sempra LNG International, LLC, Docket No. 25-101-NG
Sempra LNG Marketing, LLC, Docket No. 26-68-LNG
Termoelectrica de Mexicali, S. de R.L. de C.V., Docket No. 24-99-NG
Vista Pacifico LNG S.A.P.I. de C.V., Docket No. 20-153-LNG
Statement of Change in Control

Dear Ms. Sweeney:

Pursuant to the authorizations issued by the Department of Energy's Hydrocarbons and Geothermal Energy Office ("DOE/HGEO") (formerly the Office of Fossil Energy and Carbon Management) in the above-captioned proceedings and the *Procedures for Changes in Control Affecting Applications and Authorizations to Import or Export Natural Gas* ("CIC Procedures"),[1] Cameron LNG, LLC ("Cameron LNG"), Energía Costa Azul, S. de R.L. de C.V. ("ECA"), ECA Liquefaction, S. de R.L. de C.V. ("ECA Liquefaction"), Port Arthur LNG, LLC ("PALNG"), Port Arthur LNG Phase II, LLC ("PALNG Phase II"), Sempra Gas & Power Marketing, LLC ("Sempra Gas & Power"), Sempra LNG International, LLC ("Sempra LNG International"), Sempra LNG Marketing, LLC ("Sempra LNG Marketing"), Termoelectrica de Mexicali, S. de R.L. de C.V. ("Termoelectrica"), and Vista Pacifico LNG S.A.P.I. de C.V. ("Vista Pacifico") (collectively, "Authorization Holders") respectfully submit this Statement of Change in Control with respect to a change in the Authorization Holders' upstream ownership.

[1] 79 Fed. Reg. 65541 (Nov. 5, 2014) [hereinafter CIC Procedures].

As described further below, this ownership change is the result of the acquisition by KKR Pinnacle Investor L.P. ("KKR Pinnacle"), a vehicle managed and advised by affiliates of KKR & Co. Inc. ("KKR & Co." and, together with its direct and indirect subsidiaries, "KKR"), of additional interests in the equity of Sempra Infrastructure Partners, LP ("SI Partners"), increasing its total interest in SI Partners to approximately 65% (the "Transaction").

Background

As summarized in the table below, each of the Authorization Holders is authorized to import gas, or to export gas or liquefied natural gas ("LNG") to nations with which there is in effect a free trade agreement ("FTA") requiring national treatment for trade in natural gas ("FTA Authorizations") and/or to non-FTA nations (the "Non-FTA Authorizations"). Each of these DOE/HGEO authorizations to import or export gas or LNG is summarized below.

Table 1: List of DOE/HGEO Export and Import Authorizations

Authorization Holder	Docket No.	Order Nos.	Volume	Type
Cameron LNG, LLC	11-145-LNG	3059	620 Bcf/yr	Export FTA, long-term, multi-contract
	14-204-LNG	3620	152 Bcf/yr	Export FTA, long-term, multi-contract
	15-36-LNG	3680	515 Bcf/yr	Export FTA, long-term, multi-contract
	11-162-LNG	3391-A	620 Bcf/yr	Export Non-FTA, long-term, multi-contract
	15-67-LNG	3797	152 Bcf/yr	Export Non-FTA, long-term, multi-contract
	15-90-LNG	3846	515 Bcf/yr	Export Non-FTA, long-term, multi-contract

ECA Liquefaction, S. de R.L. de C.V.	18-144-LNG	4317	182 Bcf/yr	Export FTA, long-term, multi-contract
	18-144-LNG	4364	161 Bcf/yr	Export Non-FTA, long-term, multi-contract
Energía Costa Azul, S. de R.L. de C.V.	18-145-LNG	4318-B	727 Bcf/yr	Export FTA, long-term, multi-contract
	18-145-LNG	4365	475 Bcf/yr	Export Non-FTA, long-term, multi-contract
	18-145-LNG	4365-B	161 Bcf/yr	Export Non-FTA, long-term, multi-contract
Port Arthur LNG, LLC	15-53-LNG, 18-162-LNG	3698-A	698 Bcf/yr	Export FTA, long-term, multi-contract
	15-96-LNG	4372	698 Bcf/yr	Export Non-FTA, long-term, multi-contract
	26-47-LNG	5434	25 Bcf	Import FTA and Non-FTA, short-term
	26-50-LNG	5490	20 Bcf	Re-Export FTA and Non-FTA, short-term
Port Arthur LNG Phase II, LLC	20-23-LNG	4562	698 Bcf/yr	Export FTA, long-term, multi-contract
	20-23-LNG	5292	698 Bcf/yr	Export Non-FTA, long-term, multi-contract

Sempra Gas & Power Marketing, LLC	26-45-NG	5450	100 Bcf (import), 650 Bcf (export)	Import and export FTA, short-term
Sempra LNG International, LLC	25-101-NG	5342	800 Bcf (import), 800 Bcf (export)	Import and export FTA, short-term
Sempra LNG Marketing, LLC	26-68-LNG	5457	800 Bcf	Import FTA and Non-FTA, short-term
Termoelectrica de Mexicali, S. de R.L. de C.V.	24-99-NG	5204	300 Bcf	Import and export FTA, short-term
Vista Pacifico LNG S.A.P.I. de C.V.	20-153-LNG	4688	240 Bcf/yr	Export FTA, long-term, multi-contract
	20-153-LNG	4929	200 Bcf/yr	Export Non-FTA, long-term, multi-contract

Description of the Transaction

The Transaction occurred on November 12, 2026.[2] The Transaction involved KKR Pinnacle's acquisition of additional interests in SI Partners, to increase its interests in the SI Public Utilities,[3] amounting to majority control (approximately 65%). Pursuant to a Purchase And Sale Agreement, dated as of September 22, 2025, by and among KKR Pinnacle, Pinnacle 2 Investor HoldCo SPV DRE L.P. ("KKR Pinnacle DRE"),[4] Sempra Infrastructure Partners 2, LLC ("Sempra Partner"), and Sempra Infrastructure Partners GP, LLC ("Sempra GP"), KKR Pinnacle purchased (a) from Sempra Partner, a number of Class A Units representing, as of the closing date, forty-five

[2] For further information, see Application for Authorization Under Section 203 of the Federal Power Act and Request for Waivers of Filing Requirements, Privileged and Confidential Treatment, and Expedited Consideration, *Sempra Gas & Power Marketing, LLC*, FERC Docket No. EC26-16-000, Accession No. 20251028-5222 (filed Oct. 28, 2025) [hereinafter FERC Section 203 Application]. The FERC Section 203 Application was approved by the Federal Energy Regulatory Commission on December 23, 2025. *Sempra Gas & Power Marketing, LLC*, Order Authorizing Disposition of Jurisdictional Facilities, 193 FERC ¶ 62,193 (2025).

[3] The SI Public Utilities, as defined in the FERC Section 203 Application at 1, include Sempra Gas & Power Marketing, LLC, Energia Sierra Juarez U.S., LLC, Energia Sierra Juarez U.S. Transmission, LLC, and Termoelectrica U.S., LLC.

[4] KKR Pinnacle DRE is a signatory to the Purchase And Sale Agreement, but solely as a purchaser of interests in SI Partners via payment of notes; KKR Pinnacle DRE is under 100 percent common control with KKR Pinnacle.

percent (45%) of the issued and outstanding Class A Units, and (b) from Sempra GP, all of the general partner interests of SI Partners.

Following consummation of the Transaction, KKR Pinnacle owns and controls 65% of voting interests in SI Partners, Sempra owns 25%, and the Abu Dhabi Investment Authority ("ADIA") continues to own 10%. As part of the Transaction, the Canada Pension Plan Investment Board ("CPPIB") acquired limited partnership interests (i.e., non-voting economic interests) in SI Partners through a KKR-formed and sponsored vehicle.[5]

The ownership of each of the Authorization Holders prior to the Transaction is summarized as follows:

- **Cameron LNG, LLC:** Cameron LNG, LLC is wholly owned by Cameron LNG Holdings LLC ("Cameron LNG Holdings"). Cameron LNG Holdings, in turn, is directly owned by Sempra LNG Holdings II, LLC ("Sempra LNG Holdings") (50.2% interest); and by Global LNG North America Corp.;[6] Mitsui & Co. Cameron LNG Investment LLC;[7] and Japan LNG Investment, LLC[8] (each of which holds a 16.6% interest). As is relevant here, Sempra LNG Holdings is wholly owned by Sempra LNG Holdings I, LLC, which in turn is wholly owned by Sempra LNG Holding, LP, which in turn is wholly owned by Sempra Global Holdings, LP, which in turn is wholly owned by SI Partners, which in turn prior to the Transaction was 70% owned by Sempra, 20% owned by KKR Pinnacle, and 10% owned by Black Silverback ZC 2022 LP, a wholly owned indirect subsidiary of ADIA.

- **ECA Liquefaction, S. de R.L. de C.V.:** Over 99.9% of ECA Liquefaction, S. de R.L. de C.V. is owned by ECA LNG Holdings B.V. ("ECA LNG Holdings"). ECA LNG Holdings is in turn 41.7% owned by IEnova, 41.7% owned by Sempra LNG ECA Liquefaction, LP, and 16.6% owned by Total Gaz Electricite Holdings France.[9] As is relevant here, Sempra LNG ECA Liquefaction, LP is wholly owned by Sempra LNG Holding, LP, which in turn is wholly owned by Sempra Global Holdings, LP, which in turn is wholly owned by SI Partners, which in turn prior to the Transaction was 70% owned by Sempra, 20% owned by KKR Pinnacle, and 10% owned by Black Silverback ZC 2022 LP, a wholly owned indirect subsidiary of ADIA.

---

[5] CPPIB will own a discrete and separate class of securities, will hold limited consent and veto rights, will not exercise day-to-day control (either directly or indirectly) over any SI Partners public utility nor over any investor vehicle, cannot remove any SI Partners public utility or other SI Partners manager without cause, and cannot appoint a non-independent director. *See* FERC Section 203 Application at 1 n.1 and 26 n.76.

[6] Global LNG North America Corp. is an indirect subsidiary of TotalEnergies SE.

[7] Mitsui & Co. Cameron LNG Investment LLC is an indirect subsidiary of Mitsui & Co., Ltd.

[8] Japan LNG Investment, LLC is an indirect subsidiary of Nippon Yusen Kabushiki Kaisha (30%) and Mitsubishi Corp. (70%).

[9] Total Gaz Electricite Holdings France is an indirect subsidiary of TotalEnergies SE.

- **Energía Costa Azul, S. de R.L. de C.V.:** Over 99.99% of Energía Costa Azul, S. de R.L. de C.V. is owned by IEnova, and the remaining shares are owned by an affiliate of Sempra. Currently, 70.17% of the shares in IEnova are held by Semco Holdco, S. de R.L. de C.V., which in turn is over 99.99% owned by Sempra Energy Holdings XI B.V., with the remaining shares owned by Sempra Energy International Holdings B.V. Sempra Energy Holdings XI B.V. is wholly owned by Sempra Energy International Holdings B.V., which in turn is wholly owned by Sempra Energy International Holdings III B.V., which in turn is wholly owned by Pacific Enterprises International, LP, which in turn is wholly owned by Sempra Energy International, LP, which in turn is wholly owned by SI Partners, which in turn prior to the Transaction was 70% owned by Sempra, 20% owned by KKR Pinnacle, and 10% owned by Black Silverback ZC 2022 LP, a wholly owned indirect subsidiary of ADIA. In addition, 29.75% of the shares in IEnova are held by Sempra Energy International Holdings B.V. In the aggregate, 99.92% of the shares in IEnova are indirectly owned by SI Partners and the remainder are owned by unrelated entities.

- **Port Arthur LNG, LLC:** Port Arthur LNG, LLC is wholly owned by Port Arthur Liquefaction Holdings, LLC, which in turn is 30% owned by ConocoPhillips Port Arthur LNG LLC, a wholly owned indirect subsidiary of ConocoPhillips Company, and 70% owned by Sempra Energy PALNG Holdings, LLC, which in turn is 60% owned by KKR Denali HoldCo LLC, which is wholly controlled by KKR-managed vehicles, and 40% owned by Sempra LNG Holding, LP, which in turn is wholly owned by Sempra Global Holdings, LP, which in turn is wholly owned by SI Partners, which in turn prior to the Transaction was 70% owned by Sempra, 20% owned by KKR Pinnacle, and 10% owned by Black Silverback ZC 2022 LP, a wholly owned indirect subsidiary of ADIA.

- **Port Arthur LNG Phase II, LLC:** Port Arthur LNG Phase II, LLC is wholly owned by Port Arthur LNG Phase II Intermediate Company, LLC ("Phase II JVCo"), which in turn is 40.0% owned by BX Frontier Member I LLC, which in turn is wholly owned by BX Frontier Member I Holdings LLC, which is 50.1% indirectly controlled by Blackstone Inc. and is 49.9% controlled by KKR-managed vehicles, Apollo Global Management, Inc., and Goldman Sachs Asset Management. Additionally, 9.9% of the shares of Phase II JVCo are held by BX Frontier Member II LLC, which in turn is wholly owned by Blackstone Private Credit Fund, which is indirectly controlled by Blackstone Inc. In addition, 50.1% of the shares of Phase II JVCo are held by Port Arthur Liquefaction Holdings Phase II, LLC, which in turn is wholly owned by Sempra PALNG Expansion Development Company, LLC, which in turn is wholly owned by Sempra LNG Holding, LP, which in turn is wholly owned by Sempra Global Holdings, LP, which in turn is wholly owned by SI Partners, which in turn prior to the Transaction was 70% owned by Sempra, 20% owned by KKR Pinnacle, and 10% owned by Black Silverback ZC 2022 LP, a wholly owned indirect subsidiary of ADIA.[10]

[10] On October 2, 2025, Port Arthur LNG Phase II, LLC filed a Statement of Change in Control in connection with a change in its upstream ownership resulting from the subscription by a consortium led by Blackstone Credit and Insurance of a 49.90% interest in the equity of Port Arthur LNG Phase II Intermediate Company, LLC, the parent of Port Arthur LNG Phase II, LLC. That Statement of Change in Control is unrelated to the Transaction.

- **Sempra Gas & Power Marketing, LLC:** Sempra Gas & Power Marketing, LLC is wholly owned by Sempra LNG Holding, LP, which in turn is wholly owned by Sempra Global Holdings, LP, which in turn is wholly owned by SI Partners, which in turn prior to the Transaction was 70% owned by Sempra, 20% owned by KKR Pinnacle, and 10% owned by Black Silverback ZC 2022 LP, a wholly owned indirect subsidiary of ADIA.

- **Sempra LNG International, LLC:** Sempra LNG International, LLC is wholly owned by Sempra LNG International Holdings I, LLC, which in turn is wholly owned by Sempra LNG Holding, LP, which in turn is wholly owned by Sempra Global Holdings, LP, which in turn is wholly owned by SI Partners, which in turn prior to the Transaction was 70% owned by Sempra, 20% owned by KKR Pinnacle, and 10% owned by Black Silverback ZC 2022 LP, a wholly owned indirect subsidiary of ADIA.

- **Sempra LNG Marketing, LLC:** Sempra LNG Marketing, LLC is wholly owned by Sempra LNG Holdings I, LLC, which in turn is wholly owned by Sempra LNG Holding, LP, which in turn is wholly owned by Sempra Global Holdings, LP, which in turn is wholly owned by SI Partners, which in turn prior to the Transaction was 70% owned by Sempra, 20% owned by KKR Pinnacle, and 10% owned by Black Silverback ZC 2022 LP, a wholly owned indirect subsidiary of ADIA.

- **Termoelectrica de Mexicali, S. de R.L. de C.V.:** Over 99.99% of Termoelectrica de Mexicali, S. de R.L. de C.V. is owned by IEnova, and the remaining shares are owned by an affiliate of Sempra. Currently, 70.17% of the shares in IEnova are held by Semco Holdco, S. de R.L. de C.V., which in turn is over 99.99% owned by Sempra Energy Holdings XI B.V., with the remaining shares owned by Sempra Energy International Holdings B.V. Sempra Energy Holdings XI B.V. is wholly owned by Sempra Energy International Holdings B.V., which in turn is wholly owned by Sempra Energy International Holdings III B.V., which in turn is wholly owned by Pacific Enterprises International, LP, which in turn is wholly owned by Sempra Energy International, LP, which in turn is wholly owned by SI Partners, which in turn prior to the Transaction was 70% owned by Sempra, 20% owned by KKR Pinnacle, and 10% owned by Black Silverback ZC 2022 LP, a wholly owned indirect subsidiary of ADIA. In addition, 29.75% of the shares in IEnova are held by Sempra Energy International Holdings B.V. In the aggregate, 99.92% of the shares in IEnova are indirectly owned by SI Partners and the remainder are owned by unrelated entities.

- **Vista Pacifico LNG S.A.P.I. de C.V.:** Over 99.99% of Vista Pacifico LNG S.A.P.I. de C.V. is owned by IEnova, and the remaining shares are owned by an affiliate of Sempra. Currently, 70.17% of the shares in IEnova are held by Semco Holdco, S. de R.L. de C.V., which in turn is over 99.99% owned by Sempra Energy Holdings XI B.V., with the remaining shares owned by Sempra Energy International Holdings B.V. Sempra Energy Holdings XI B.V. is wholly owned by Sempra Energy International Holdings B.V., which in turn is wholly owned by Sempra Energy International Holdings III B.V., which in turn

> is wholly owned by Pacific Enterprises International, LP, which in turn is wholly owned by Sempra Energy International, LP, which in turn is wholly owned by SI Partners, which in turn prior to the Transaction was 70% owned by Sempra, 20% owned by KKR Pinnacle, and 10% owned by Black Silverback ZC 2022 LP, a wholly owned indirect subsidiary of ADIA. In addition, 29.75% of the shares in IEnova are held by Sempra Energy International Holdings B.V. In the aggregate, 99.92% of the shares in IEnova are indirectly owned by SI Partners and the remainder are owned by unrelated entities.

A chart illustrating the simplified ownership structure of the Authorization Holders prior to the Transaction is attached herewith as Exhibit A. A chart illustrating the simplified ownership structure of the Authorization Holders following the Transaction is attached herewith as Exhibit B.

Change in Control Procedures

Section 590.405 of DOE's regulations provides that "[a]uthorizations by the Assistant Secretary to import or export natural gas shall not be transferable or assignable, unless specifically authorized by the Assistant Secretary."[11] DOE construes a change of control to mean:

> a change, directly or indirectly, of the power to direct the management or policies of an entity whether such power is exercised through one or more intermediary companies or pursuant to an agreement, written or oral, and whether such power is established through ownership or voting of securities, or common directors, officers, or stockholders, or voting trusts, holding trusts, or debt holdings, or contract, or any other direct or indirect means.[12]

DOE has explained that a rebuttable presumption that control exists will arise from the ownership or the power to vote, directly or indirectly, 10 percent or more of the voting securities of such entity.[13]

KKR Pinnacle's acquisition of an additional 45% ownership interest in SI Partners, an upstream owner of the Authorization Holders, may trigger DOE/HGEO's threshold for a rebuttable presumption that a change in control has occurred.

The procedures for notifying DOE/HGEO of a change in control are set forth in the CIC Procedures, pursuant to which a holder of an export authorization may notify DOE/HGEO of a transaction by submitting a statement of change in control to DOE/HGEO no later than 30 days after such changes have been effectuated.[14]

---

[11] 10 C.F.R. § 590.405 (2026).

[12] CIC Procedures at 65542. *See also, e.g.*, DOE/FE Order No. 4364 at 48-49.

[13] CIC Procedures at 65542.

[14] *Id.*

FTA Export Authorizations and Import Authorizations

With respect to FTA long-term export and import authorizations and Non-FTA long-term import authorizations, the CIC Procedures provide that upon receipt of a statement of change in control, DOE/HGEO will give effect to the change in control and take no further action.[15]

With respect to the FTA export authorizations and import authorizations[16] set forth in Table 1 above, the relevant Authorization Holders respectfully request that DOE/HGEO give immediate effect to the change in control described herein upon receipt of this Statement, in accordance with the CIC Procedures.

Non-FTA Export Authorizations

For existing Non-FTA export authorizations, upon receipt of a statement of change in control, the CIC Procedures provide that DOE/HGEO will publish a notice of the change in the *Federal Register* and provide interested persons 15 days from the date of publication to move to intervene, protest, and answer the statement of change in control.[17] If no interested person protests the change in control and DOE/HGEO takes no action on its own motion, the change in control is deemed granted 30 days after publication.[18] If a protest is filed, DOE/HGEO will make a determination as to whether the proposed change in control has been demonstrated to render the underlying authorization inconsistent with the public interest.[19]

Where a transfer or assignment will not result in any substantive changes in the terms and conditions of the initial authorization, DOE/HGEO has generally relied on its previous determination that the import or export is consistent with the public interest when evaluating the transfer or assignment.[20] For example, DOE/HGEO has approved transfers of control that involve

---

[15] *Id.*

[16] Although the CIC Procedures explicitly apply to *long-term* import authorizations, the relevant Authorization Holders respectfully request that DOE/HGEO provide the same treatment to the short-term, blanket import authorizations referenced herein. Accordingly, the relevant Authorization Holders request that DOE/HGEO give immediate effect to the change in control resulting from the Transaction with respect to the short-term import authorizations set forth in Table 1 of this Statement.

[17] CIC Procedures at 65542.

[18] *Id.*

[19] *Id.*

[20] *See Cameron LNG, LLC et al.*, DOE/FECM Order No. 4815, Docket Nos. 11-145-LNG, *et al.*, 21-50-NG, 18-144-LNG, 18-145-LNG, 15-53-LNG, *et al.*, 20-23-LNG, 20-43-NG, 21-83-NG, 20-52-LNG, 20-145-NG, & 20-153-LNG, Order Approving Change in Control at 4 (2022) (finding that the "proposed change in control has not been demonstrated to render the underlying non-FTA authorizations inconsistent with the public interest under NGA section 3(a)"); *Cameron LNG, LLC*, DOE/FE Order No. 3452, FE Docket Nos. 14-001-CIC, 11-162-LNG, & 11-145-LNG, Order Approving Change in Control of Export Authorizations at 7 (2014) (approving change in control application, finding "it has not been shown that the change in control will impact any of the public interest considerations evaluated by DOE/FE in issuing [the] authorizations"); *Brooklyn Union Gas Co. et al.*, DOE/FE Opinion & Order No. 561, DOE/ERA Docket No. 86-48-NG, Order Granting Transfer of Long-Term Import

no changes to the scope of a project, total volumes of gas, date of commencement or completion, source and security of gas supply, price and other transactional terms, or proven need for the supply.[21] DOE/HGEO has also approved transfers of control upon a finding that "[t]he contractual terms and conditions of the import and export arrangements upon which the section 3 determinations were based would remain the same, and there [was] no other information in the record . . . to support or compel reexamination under section 3."[22] Similarly here, the Transaction has no substantive effect on the terms and conditions of the Non-FTA export authorizations listed in Table 1 above—the change in control has no effect on the scope of the projects, the amount of gas exported, the commencement or completion dates of the projects, the sources of the gas supply, or the prices or other transactional terms. Operation and maintenance of the relevant terminals will continue to be under the control of the respective Authorization Holder. The relevant Authorization Holders will continue to hold the export authorizations described herein and will remain the points of contact with DOE/HGEO with respect to reporting and administration under the authorizations.

Moreover, DOE/HGEO has approved applications to transfer or assign an authorization from the authorization holder to one or more of its customers where the general terms and conditions otherwise remain unchanged and the total authorized volumes do not increase.[23]

Authorization and Granting Intervention at 7 (1991) ("To the extent that the transfer does not effect (sic) the terms and conditions of the underlying import arrangement, the DOE can rely on its previous determinations regarding that arrangement when considering the transfer application."); *Nw. Pipeline Corp. et al.*, DOE/FE Opinion & Order No. 664, FE Docket No. 92-18-NG, Order Transferring Authority to Import Natural Gas from Canada and Granting Interventions at 6-7 (1992) ("The burden of proof, however, belongs to [protesters] and they have failed to rebut DOE's previous finding of need . . ., a finding which was based on circumstances that will not change as a result of the proposed transfer."), *reh'g denied*, DOE/FE Opinion & Order No. 664-A (1992), *order terminating long-term authorization*, DOE/FE Order No. 664-B (1994), *order amending authorization*, DOE/FE Order No. 664-C (1998), *order amending authorization*, DOE/FE Order No. 664-D (1999); *Great Lakes Gas Transmission LP et al.*, DOE/FE Opinion & Order No. 424, FE Docket No. 90-28-NG, Order Reassigning Existing Authorizations to Import and Export Natural Gas and Granting Interventions at 3 (1990); *Midwestern Gas Transmission Co. et al.,* DOE/FE Opinion & Order No. 318, FE Docket No. 89-25-NG, Order Transferring Authorizations to Import Natural Gas from Canada and Granting Interventions at 3 (1989) ("Viking will succeed Midwestern as buyer under the contracts underlying the authorizations. In no other respect will the terms and conditions of these contracts change. Only the identity of the importer will change."); *Consumers Power Co. et al.*, DOE/FE Opinion & Order No. 390, FE Docket Nos. 88-38-NG & 88-50-NG, Order Transferring an Authorization to Import Natural Gas from Canada, Approving Amendments, and Granting Intervention at 3-4 (1990), *order amending authorization*, DOE/FE Order No. 390-A (1994), *order terminating authorization*, DOE/FE Order No. 390-B (1995).

[21] *See Brooklyn Union Gas Co.*, DOE/FE Opinion & Order No. 561 at 2-3, 7.

[22] *Great Lakes Gas Transmission LP*, DOE/FE Opinion & Order No. 424 at 3.

[23] *See Nw. Pipeline Corp.*, DOE/FE Opinion & Order No. 664; *Great Lakes Gas Transmission Co. et al.,* DOE/FE Opinion & Order No. 416, FE Docket No. 90-03-NG, Order Reassigning an Import Authorization, Granting Authority to Import Additional Interruptible Volumes of Natural Gas from Canada, and Granting Interventions (1990); *Consumers Power Co.*, DOE/FE Opinion & Order No. 390; *Great Lakes Gas Transmission Co. et al.,* DOE/ERA Opinion & Order No. 207, ERA Docket No. 87-31-NG, Order Reassigning an Import Authorization and Granting Authority to Import Additional Interruptible Volumes of Canadian Natural Gas (1987); *Great Lakes Gas Transmission Co. et al.,* DOE/ERA Opinion & Order No. 157, ERA Docket No. 86-50-NG, Order Granting Authorization to Import Natural Gas from Canada and Amending Prior Authorizations to Reflect an Equivalent Reduction in the Volumes Imported (1987).

Similarly here, there will be no substantive changes to the terms and conditions, including the volumes, of the existing authorizations as a result of the acquisition of an increased upstream ownership interest by KKR Pinnacle. DOE/HGEO has also held that the inflow of foreign capital to finance construction of LNG liquefaction and export facilities is not inconsistent with the public interest.[24]

Based on the foregoing, the relevant Authorization Holders submit that the Transaction and resulting changes in upstream ownership have no effect on the grounds underlying the public interest determination previously made by DOE/HGEO in issuing the Non-FTA export authorizations set forth in Table 1.

Conclusion

For the foregoing reasons, the Authorization Holders respectfully request that DOE/HGEO give effect to the change in control described herein.

Please contact the undersigned with any questions regarding this submission.

Respectfully submitted,

/s/ Brett A. Snyder
Brett A. Snyder

Counsel to Cameron LNG, LLC, Energía Costa Azul, S. de R.L. de C.V., ECA Liquefaction, S. de R.L. de C.V., Port Arthur LNG, LLC, Port Arthur LNG Phase II, LLC, Vista Pacifico LNG S.A.P.I. de C.V., Sempra Gas & Power Marketing, LLC, Sempra LNG International, LLC, Sempra LNG Marketing, LLC, and Termoelectrica de Mexicali, S. de R.L. de C.V.

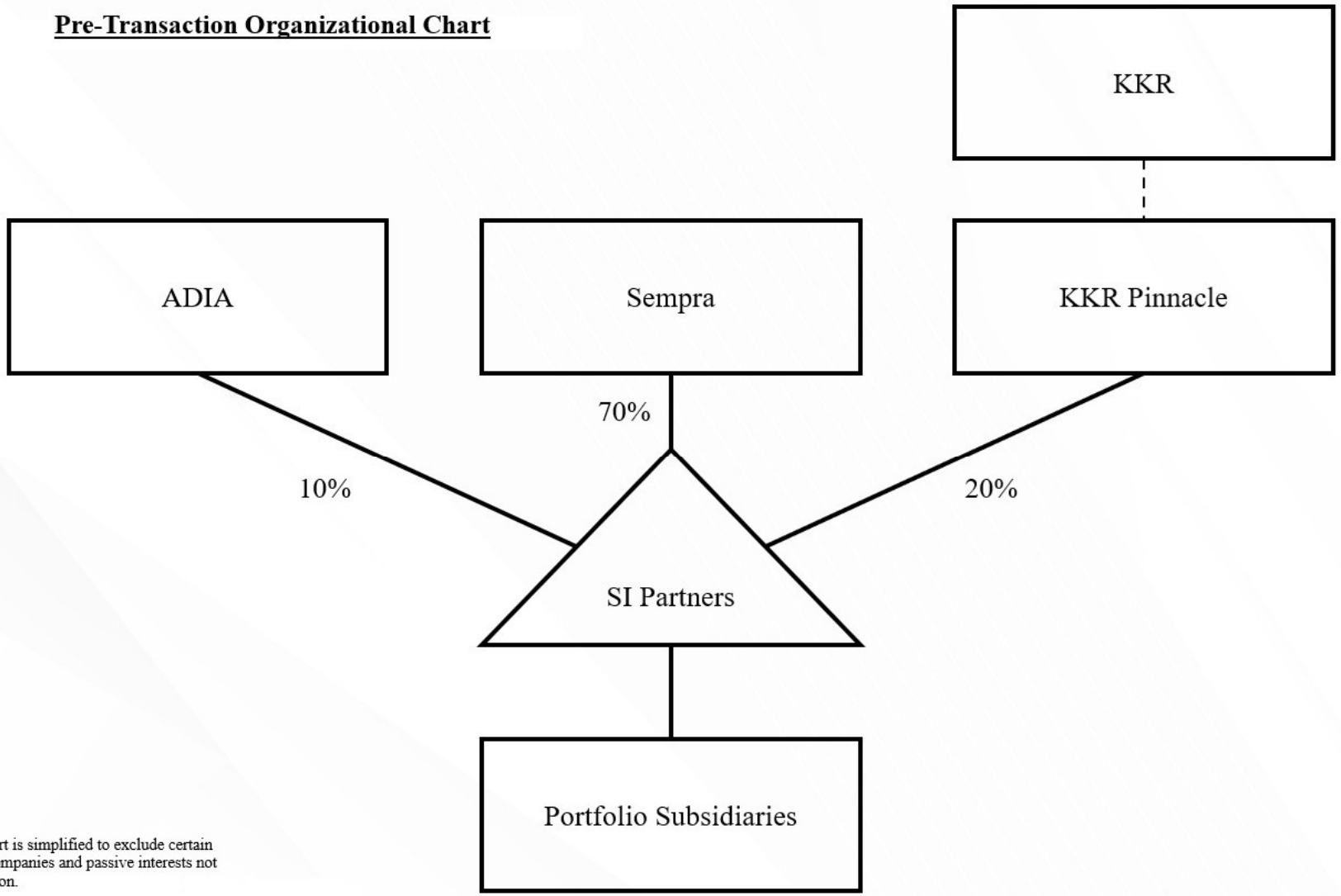
BAS:esc

cc: Jerrod L. Harrison
Sempra Infrastructure

[24] *See Jordan Cove Energy Project, L.P.*, DOE/FE Order No. 3413, FE Docket No. 12-32-LNG, Order Conditionally Granting Long-Term Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from the Jordan Cove LNG Terminal in Coos Bay, Oregon to Non-Free Trade Agreement Nations at 118-120 (2014); *Freeport LNG Expansion, L.P. et al.*, FE Docket Nos. 10-161-LNG & 11-161-LNG, Letter Order at 4 (June 17, 2016) (finding that "indiscriminate opposition to foreign controlling interests does not support a determination that the change in control in this proceeding is inconsistent with the public interest"); *Cameron LNG, LLC*, DOE/FECM Order No. 4815 at 8-9 (same).

EXHIBIT A

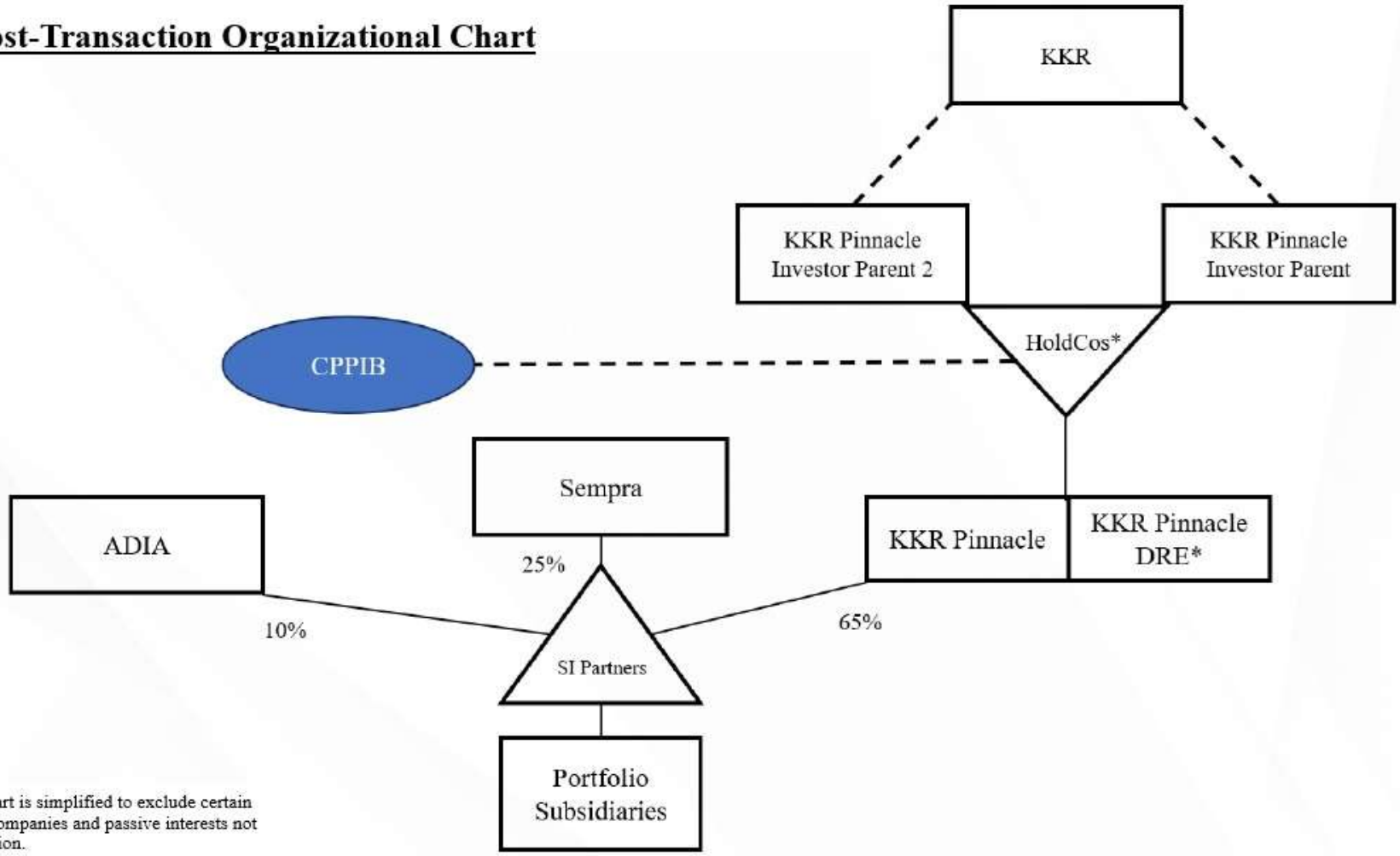
Pre-Transaction Organizational Chart



This organizational chart is simplified to exclude certain intermediate holding companies and passive interests not relevant to the transaction.

EXHIBIT B

Post-Transaction Organizational Chart



This organizational chart is simplified to exclude certain intermediate holding companies and passive interests not relevant to the transaction.

VERIFICATION

I, Sigurd Lars Carlson, declare that I am Vice President – Project Development, Sempra Infrastructure, L.P., and am duly authorized to make this Verification; that I have read the foregoing document and that the facts therein stated are true and correct to the best of my knowledge, information, and belief.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in San Diego, California, on November 20, 2026.

/s/ Sigurd Lars Carlson
Sigurd Lars Carlson
Vice President – Project Development
Sempra Infrastructure, L.P.
488 8th Avenue
San Diego, CA 92101

November 20, 2026

Ms. Amy Sweeney, Director
Office of Global Energy Security
Hydrocarbons and Geothermal Energy Office
EX-34
1000 Independence Ave. S.W.
Washington, DC 20585

Re: Cameron LNG, LLC, Docket Nos. 11-145-LNG, 11-162-LNG, 14-204-LNG, 15-36-LNG, 15-67-LNG, 15-90-LNG
ECA Liquefaction, S. de R.L. de C.V., Docket No. 18-144-LNG
Energía Costa Azul, S. de R.L. de C.V., Docket No. 18-145-LNG
Port Arthur LNG, LLC, Docket Nos. 15-53-LNG, 15-96-LNG, 18-162-LNG, 26-47-LNG, 26-50-LNG
Port Arthur LNG Phase II, LLC, Docket No. 20-23-LNG
Sempra Gas & Power Marketing, LLC, Docket No. 26-45-NG
Sempra LNG International, LLC, Docket No. 25-101-NG
Sempra LNG Marketing, LLC, Docket No. 26-68-LNG
Termoelectrica de Mexicali, S. de R.L. de C.V., Docket No. 24-99-NG
Vista Pacifico LNG S.A.P.I. de C.V., Docket No. 20-153-LNG
Statement of Change in Control

Dear Ms. Sweeney:

This opinion of counsel is submitted pursuant to Section 590.202(c) of the regulations of the United States Department of Energy ("DOE"), 10 C.F.R. § 590.202(c) (2026). I am counsel to Cameron LNG, LLC, Energía Costa Azul, S. de R.L. de C.V., ECA Liquefaction, S. de R.L. de C.V., Port Arthur LNG, LLC, Port Arthur LNG Phase II, LLC, Vista Pacifico LNG S.A.P.I. de C.V., Sempra Gas & Power Marketing, LLC, Sempra LNG International, LLC, Sempra LNG Marketing, LLC, and Termoelectrica de Mexicali, S. de R.L. de C.V. ("Authorization Holders").

I have reviewed the organizational and internal governance documents of the Authorization Holders and it is my opinion that the Statement of Change in Control filed by the Authorization Holders with the DOE Hydrocarbons and Geothermal Energy Office (formerly the Office of Fossil Energy and Carbon Management) on November 20, 2026, is within the company powers of the Authorization Holders.

Respectfully submitted,

/s/ Jerrod L. Harrison

Jerrod L. Harrison
Assistant General Counsel
488 8th Avenue
San Diego, CA 92101
619-696-2987
JHarrison@sempraglobal.com

On Behalf of Cameron LNG, LLC, Energía Costa Azul, S. de R.L. de C.V., ECA Liquefaction, S. de R.L. de C.V., Port Arthur LNG, LLC, Port Arthur LNG Phase II, LLC, Vista Pacifico LNG S.A.P.I. de C.V., Sempra Gas & Power Marketing, LLC, Sempra LNG International, LLC, Sempra LNG Marketing, LLC, and Termoelectrica de Mexicali, S. de R.L. de C.V.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list in the following proceedings: Docket Nos. 11-145-LNG; 11-162-LNG; 14-204-LNG; 15-36-LNG; 15-67-LNG; 15-90-LNG; 15-53-LNG; 15-96-LNG; 18-144-LNG; 18-145-LNG; 18-162-LNG; 20-23-LNG; 20-153-LNG; 24-99-NG; 25-101-NG; 26-45-NG; 26-47-LNG; 26-50-LNG; and 26-68-LNG.

Dated at Washington, D.C., this 20th day of November 2026.

/s/ Emily Childress
Emily Childress
Blank Rome LLP
1825 Eye Street NW
Washington, D.C. 20006
Tel.: (202) 420-2398
emily.childress@blankrome.com