

**UNITED STATES OF AMERICA
BEFORE THE
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL ENERGY**

Alaska LNG Project LLC

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FE Docket No. 14-96-LNG

**MOTION TO INTERVENE AND COMMENTS
OF TRANSCANADA ALASKA MIDSTREAM, LP
IN SUPPORT OF THE REQUESTED EXPORT AUTHORIZATION**

On September 17, 2014, the Office of Fossil Energy of the Department of Energy (“DOE”) provided notice (“Notice”) of receipt of an application by Alaska LNG Project LLC (“Alaska LNG” or “Applicant”) pursuant to Section 3 of the Natural Gas Act (“NGA”), 15 U.S.C. 717b, requesting long-term authorization to export 20 million metric tons per annum of liquefied natural gas (“LNG”) produced from Alaska sources in a volume equivalent to approximately 929 billion cubic feet per year, or 2.55 Bcf per day, from a liquefaction facility to be constructed in the Nikiski area of the Kenai Peninsula in south central Alaska (“Project”) to (1) any country with which the United States currently has, or in the future may enter into, a free trade agreement (“FTA”) requiring national treatment for trade in natural gas¹ and (2) any country with which the United States does not have a FTA requiring national treatment for trade in natural gas with which trade is not prohibited by United States law or policy.²

The Notice provides that any person wishing to become a party to the Applicant’s proceeding must file a motion to intervene or notice of intervention, as applicable. DOE

¹ The United States currently has FTAs requiring national treatment for trade in natural gas with Australia, Bahrain, Canada, Chile, Colombia, Dominican Republic, El Salvador, Guatemala, Honduras, Jordan, Mexico, Morocco, Nicaragua, Oman, Panama, Peru, Republic of Korea and Singapore.

² See *Alaska LNG Project LLC*, Application of Alaska LNG Project LLC for Long-Term Authorization to Export Liquefied Natural Gas, DOE/FE Docket No. 14-LNG-96 (Jul. 18, 2014) [*hereinafter* “Application”].

requests that motions to intervene and comments on Alaska LNG's Application be submitted no later than November 17, 2014.

I. MOTION TO INTERVENE

Pursuant to 10 C.F.R. § 590.303, TransCanada Alaska Midstream, LP ("TransCanada") submits this motion to intervene, as well as comments in support, regarding Alaska LNG's Application filed in this docket on July 18, 2014.

Communications regarding this pleading or this proceeding should be addressed to:

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**Denotes persons to be designated for service.*

TransCanada has pursued commercialization of Alaska's vast North Slope natural gas resources for nearly four decades through numerous project configurations. Alaska LNG's Project is the most recent project in which TransCanada is a participant. As explained in the Application and the Heads of Agreement discussed therein³, the major North Slope natural gas producers, the State of Alaska, and TransCanada have aligned on the key principles upon which the parties intend to advance the Project. In addition, the State of Alaska has entered into implementation agreements pursuant to which TransCanada will participate in the development of the Project, own a portion of the midstream components of the Project, and provide gas treatment and transportation

³ See Application at 3.

services on the midstream components of the Project to the State of Alaska for its share of the natural gas pursuant to a Firm Transportation Services Agreement.⁴ TransCanada thus has a direct and immediate interest in this docket which cannot be adequately protected by any other party. Accordingly, TransCanada should be permitted to intervene in this docket with full rights as a party.

II. COMMENTS IN SUPPORT

TransCanada fully supports Alaska LNG's request for expedited approval of the requested export authority because the request is consistent with the public interest of Alaska and the United States.

The natural gas at issue for export in this proceeding is geographically separate from the lower 48 United States and stranded in Alaska's North Slope. The Project provides an opportunity to release these captive gas resources and unlock their associated benefits. TransCanada agrees with Alaska LNG that the North Slope contains sufficient gas supplies to satisfy both in-state gas demand and demand for gas exports.⁵ Further, the pipeline consumer off-takes proposed for the Project will expand access to previously inaccessible gas, thereby increasing gas supplies for all Alaskan residents. This will improve the economics of purchasing gas for in-state residents, who already face some of the highest home heating bills in the United States.

As stated in the Application and the letter from the Alaskan Congressional Delegation filed in this docket on September 30, 2014, the Project also will provide significant economic benefits to the residents of the Alaska through the creation of

⁴ See Memorandum of Understanding, dated December 12, 2013 between TransCanada Alaska Company, LLC, Foothills Pipe Lines Ltd., TransCanada Alaska Development Inc. and the State of Alaska *available at* <http://dor.alaska.gov/Portals/5/Docs/PressReleases/MOU.PDF>.

⁵ See Application at 17.

15,000 construction jobs and 1,000 jobs for Project operation.⁶ The Project also will increase state revenues by providing a long-term stream of revenue and by enhancing the tax base of the area.⁷ In addition, construction of the Project will facilitate and encourage increased exploration, development, and production of additional oil and gas resources on the North Slope to the ultimate benefit of Alaskans and lower 48 United States businesses and consumers.

The Application and attached study by NERA Economic Consulting also indicate that the Project would lower natural gas prices in Alaska and have “unequivocally positive” economic impacts for Alaska and the entire United States.⁸ As proposed, the \$45 billion to \$60 billion Project is the largest integrated natural gas/LNG project ever designed and constructed. Given the Project’s estimated 12-year start-up period, expeditious export authorization from DOE is necessary to realize the significant benefits of the Project as soon as possible.

III. CONCLUSION

TransCanada respectfully requests that DOE grant this timely motion to intervene and that TransCanada be accorded full party status in any proceedings held by DOE in this docket. For the reasons stated above, TransCanada strongly supports Alaska LNG’s

⁶ *See id.* at 32.

⁷ *Id.*

⁸ *See id.* at 29.

request that DOE expeditiously grant the authorizations as requested.

Respectfully submitted,



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/s/ Mona Tandon

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Dated: November 17, 2014

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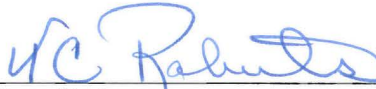
Alaska LNG Project LLC

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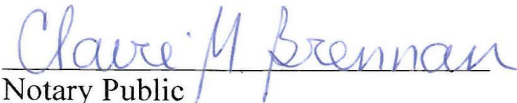
VERIFICATION

Pursuant to 10 C.F.R. § 590.103(b) (2014), Tom Roberts being duly sworn,
affirms that he is authorized to execute this verification, that he has read the foregoing
document, and that all facts stated herein are true and correct to the best of his
knowledge, information, and belief.



Tom Roberts
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Subscribed and sworn to before me this 17th day of November, 2014



Notary Public

My Commission Expires:

CLAIRE M. BRENNAN
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires July 31, 2016



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CERTIFIED STATEMENT OF AUTHORIZED REPRESENTATIVE

Pursuant to 10 C.F.R. § 590.103(b) (2014), I, Tom Roberts, hereby certify that I am a duly authorized representative of TransCanada Alaska Midstream, LP, and that I am authorized to sign and file with the Department of Energy, Office of Fossil Energy, on behalf of TransCanada Alaska Midstream, LP, the foregoing document in the above-captioned docket.

Served and dated at Washington, D.C., on this 17th day of November, 2014.



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CERTIFICATE OF SERVICE

I certify that I have this 17th day of November, 2014, served copies of the foregoing document filed with the DOE on the designated representatives of all of the parties to this proceeding, in accordance with 10 C.F.R. § 590.107 (2014).



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