



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

8:00am, Oct. 17, 2016

In the matter of:

Carib Energy (USA) LLC) FE Docket No. 16-98-LNG
)
)

MOTION TO
INTERVENE OF PIVOTAL LNG, INC.

Pursuant to 10 C.F.R. 590.303, Pivotal LNG, Inc. (“Pivotal”) files this motion to intervene in the above-captioned proceeding initiated by Carib Energy (USA) LLC (“Carib”) on March 25, 2016. In support, Pivotal states as follows.

COMMUNICATIONS

Pivotal designates the following individuals to receive service of all correspondence, communications, pleadings, and other documents related to this proceeding:

Tim Delay
Pivotal LNG, Inc.
10 Peachtree Place
Atlanta, GA 30309
tdelay@pivotalng.com
Telephone: 404.584.3622

Kathryn L. McCoy
Southern Company Gas
1200 Smith Street, Suite 900
Houston, TX 77002
kmccoy@southernco.com
Telephone: 832.397.8642

BACKGROUND

On March 25, 2016, Carib filed an application (“Application”) with the Department of Energy’s Office of Fossil Energy (“DOE/FE”) seeking long-term, multi-contract authorization to export domestically produced liquefied natural gas (“LNG”) in a volume equivalent to approximately 1.3 billion cubic feet (“Bcf”) per year (0.0036 Bcf per day) of natural gas to non-Free Trade Agreement (“non-FTA”) countries in Central America, South America, or the

Caribbean. Carib seeks this authorization to export LNG for a 20-year period commencing on the earlier of the date of first export or five years from the date the requested authorization is granted.

Pivotal and Carib have entered into a Master LNG Purchase and Sale Agreement (“MSA”) giving Carib the ability to purchase LNG from Pivotal. Pursuant to the MSA, Carib may purchase LNG produced at any of the existing natural gas liquefaction facilities listed in Appendix D of the Application, which are owned and operated by Pivotal or by one of Pivotal’s affiliates. The deadline to intervene in the above-captioned proceeding is October 17, 2016.

INTERVENTION

For the reason set forth above, Pivotal has a direct and substantial interest in this docket which cannot be adequately represented by any other party. Accordingly, Pivotal respectfully requests that it be permitted to intervene in this proceeding and be granted full rights as a party.

CONCLUSION

WHEREFORE, for the foregoing reasons, Pivotal respectfully requests that the DOE/FE grant its intervention in this proceeding making it a party for all purposes.

Respectfully submitted,

/s/ Kathryn L. McCoy

Kathryn L. McCoy
Southern Company Gas
1200 Smith Street, Suite 900
Houston, TX 77002

Counsel for Pivotal LNG, Inc.

Dated: October 14, 2016

CERTIFICATE OF SERVICE

I certify that I have this 14th day of October, 2016, serviced copies of the foregoing document filed with the DOE/FE on the designated representatives of all of the parties to this proceeding, in accordance with 10 C.F.R. § 590.107(a).

Dated: October 14, 2016

/s/ Lindsay Gottsponer

Lindsay Gottsponer
Southern Company Gas
1200 Smith Street, Suite 900
Houston, TX 77002