January 18, 2019

Steven E. Winberg
Assistant Secretary, Office of Fossil Energy
U.S. Department of Energy
Forrestal Building, Room 3E–042,
1000 Independence Avenue SW
Washington, DC 20585

RE: Natural Gas Contract Guidance: Filing of Contracts and Purchase Agreements Associated With the Export of Natural Gas

Dear Mr. Winberg:

Golden Pass Products LLC (“Golden Pass”) submits these comments in support of the separate Comments filed today in this proceeding by the Center for Liquefied Natural Gas (Center for LNG) regarding the proposed Interpretive Rule issued by the Office of Fossil Energy (FE) of the Department of Energy (DOE) on December 13, 2018, and published in the Federal Register on Wednesday, December 19, 2018.

Golden Pass wishes to emphasize in particular that contracts entered into by merchant liquefied natural gas (LNG) exporters to acquire supplies prior to the sale and physical transfer of LNG for export are beyond the legitimate scope of the filing requirement. Merchant exporters will hold a portfolio of such agreements, and will need to utilize them not only for exports but for domestic U.S. natural gas transactions. Fundamentally, these contracts do not govern the export of LNG, which would be governed by separate agreements that would be filed, providing DOE/FE will complete information regarding the relevant terms of all exports.

Accordingly, Golden Pass urges the DOE/FE to limit the requirement for filing supply agreements to contracts that provide for the transfer of title or physical custody of natural gas at the point of export in foreign commerce, as urged by the Center for LNG.

Respectfully submitted,
Golden Pass Products LLC

J. Joel Hindman
Regulatory Manager

Respectfully submitted,

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