March 20, 2025

U.S. Department of Energy (FE-34)
Office of Regulation, Analysis, and Engagement,
Office of Fossil Energy and Carbon Management,
Forrestal Building,
Room 3E–056,
1000 Independence Avenue SW,
Washington, DC 20585

Re: 2024 LNG Export Study: Energy, Economic, and Environmental Assessment of U.S. LNG Exports (2024 LNG Export Study) – Comments of Partnership to Address Global Emissions.

The Partnership to Address Global Emissions ("PAGE") hereby submits comments in response to the notice of availability and request for comments by the Department of Energy ("DOE") on the "2024 LNG Export Study: Energy, Economic, and Environmental Assessment of U.S. LNG Exports" (herein referred to as the "2024 Study") published in the Federal Register on December 20, 2024.[1] PAGE supports the continued authorization of liquefied natural gas ("LNG") exports to all countries, including countries with which the United States does not have a free trade agreement ("Non-FTA Countries"). These exports have the potential to reduce global greenhouse gas emissions and should be encouraged by the DOE, which is responsible for issuing LNG export authorizations under section 3 of the Natural Gas Act ("NGA").[2] Export authorizations are presumed to be in the public interest[3] and the agency must issue an authorization "unless, after opportunity for hearing, it finds that the proposed exportation or importation will not be consistent with the public interest."[4] With these comments, PAGE seeks to complete the administrative record before the DOE in its 2024 Study docket to ensure that its decision-making for pending and future LNG export authorizations to Non-FTA Countries is legally durable.

PAGE is a nonpartisan coalition of like-minded organizations dedicated to promoting U.S. policies, such as permitting reform, that protect the climate through the production of natural gas.[5] The coalition was formed out of a shared belief that the United States has an obligation to solve the global energy security and climate crises, and that it must do so by taking advantage of our

---

[1] 2024 LNG Export Study: Energy, Economic, and Environmental Assessment of U.S. LNG Exports, 89 Fed. Reg. 104,132 (Dec. 20, 2024). The 2024 Study is available here: https://fossil.energy.gov/app/docketindex/docket/index/30.

[2] 15 U.S.C. § 717b(a).

[3] *Sierra Club v. U.S. Dep't of Energy*, 867 F.3d 189, 203 (D.C. Cir. 2017) ("*Sierra Club I*").

[4] 15 U.S.C. § 717b(a).

[5] Our members include Toby Z. Rice, President & CEO, EQT Corporation ("EQT"), Cynthia Hansen, Executive Vice President & President, Gas Transmission & Midstream, Enbridge, and Alan S. Armstrong, President & CEO, Williams Companies. More information about our Supporting Members, Advisory Council, and State Advisory Council members can be found on our website: https://www.pagecoalition.com/about-us/.

abundant natural gas resources. Our mission of reducing carbon emissions through the immense power derived from U.S. produced natural gas aligns with the President's vision for American energy dominance. Indeed, PAGE often refers to its policy objective as the Unleashing of U.S. LNG.

The 2024 Study follows a decision by the Biden Administration in January 2024 directing the DOE to "pause" LNG export authorizations until the agency could update analyses on whether exports are in the public interest. To the extent the "pause" was ordered in service of mitigating climate change, the Biden Administration's decision was short-sighted and ill-formed. In the years and months leading up to the pause, it was apparent that United States LNG exports provided an immense opportunity for shared prosperity by increasing U.S. gross domestic product ("GDP") while reducing global emissions. There is significant data demonstrating that international coal use remains a key obstacle to reaching emission targets, and that wind and solar energy sources are incapable of reducing global emissions without the natural gas sector. U.S. natural gas provides an immediate, reliable, and low-cost solution to reaching emission-reduction goals. By exporting LNG in service of reducing international coal use, the United States can do multiple things at once, such as unleashing American energy, growing domestic economic output, reducing trade imbalances, and reducing carbon emissions. We believe that the United States has a crucial role to play in this endeavor given that two-thirds of the world's natural gas is concentrated in four countries, Rusia, Iran, Qatar, and the United States. By exporting our natural gas, the United States provides unparalleled energy security to the world and reduces the influence of our adversaries while playing a meaningful role in reaching global climate goals and competing on the global stage.

I. COMMENTS ON THE 2024 STUDY

PAGE applauds President Trump's decision to end the Biden Administration's "pause" on LNG exports to Non-FTA Countries and to allow their authorizations to continue under section 3 of the NGA.[6] The continued export of U.S. LNG provides the United States with a market-friendly tool to reduce carbon emissions without the need to rely on government subsidies or international climate treaties. Indeed, the entire natural gas value chain in the United States, from wellhead to liquefaction, through long-line transmission systems and onto oceangoing LNG vessels, is funded from private investments, not taxpayer dollars. LNG customers, which include both private corporations and state-sponsored energy companies, then make decisions to purchase U.S. LNG for a myriad of reasons. As highlighted in the 2024 Study, U.S. LNG is a cost-competitive, stable energy supply source that supports diverse energy portfolios and provides a form of baseload dispatchable power that can be accessed from multiple ready sources using mature technology and existing infrastructure.[7] Exporting United States LNG therefore is a win-win-win.

[6] *See e.g.*, Commonwealth LNG, LLC, Docket No. 19-134-LNG, DOE/FECM Order No. 5238 (issued Feb. 14, 2025) ("Commonwealth Order"), https://www.energy.gov/sites/default/files/2025-02/ord5238.pdf; Venture Global CP2 LNG, LLC, Docket No. 21-131-LNG, DOE/FECM Order No. 5264 (issued Mar. 19, 2025) ("CP2 Order"), https://www.energy.gov/sites/default/files/2025-03/ord5264.pdf.

[7] 2024 Study at S-6.

The 2024 Study concludes that the United States has enough gas supply to meet domestic and international needs through 2050, while noting certain benefits of increased exports, from increases in GDP to international stability. However, rather than highlight the multiple, and data-backed benefits of U.S. LNG as an economic driver and a powerful emissions-reduction tool, the former Secretary of Energy sought to frame the 2024 Study as providing a neutral to negative outlook for increased LNG exports, and as potentially falling short of the "public interest" standard set forth in the NGA due to concerns around climate progress, cost of living, and energy security.[8] While the 2024 Study stops short of finding additional LNG export approvals to be definitively against the public interest, the former Secretary focused on the 2024 Study's forecast that under current policies, unconstrained U.S. LNG export supply will raise wholesale energy prices by 30% and household prices by 4%, as well as lead to 0.05% higher global emissions.[9] The 2024 Study is careful not to assign any probabilities to the examined scenarios or make overly conclusive statements. However, the document likely was intended to lay the groundwork for a more robust, case-by-case balancing of environmental and economic harms during the NGA section 3 authorization process. Even in the context of economic security, the 2024 Study seeks to give policymakers pause by pointing to China, as opposed to traditional U.S. allies in Europe and Asia, as being a primary beneficiary of unfettered LNG export authorization.

PAGE believes there are a multitude of critical factors that determine whether continued authorizations of natural gas exports are in the public interest. In addition to some of the 2024 Study's own statistics and findings, numerous industry and independent studies, and data previously published by the U.S. government, demonstrate that U.S. LNG exports meet those criteria. The reality is that the United States maintains an abundance of recoverable natural gas and must leverage it to uphold our responsibilities to U.S. consumers, our allies, and the global climate. For example, a 2024 study from ICF International, Inc. ("ICF") concluded that without U.S. LNG exports abroad, global greenhouse gas emissions would have increased in 2022 by over 112 million metric tons, mostly produced by coal.[10] The same study shows that without U.S. LNG exported abroad, 88% of that energy would be replaced with higher emitting fuels (54% coal and 34% fuel oil).[11] And if the Energy Information Administration's expectation that U.S. LNG exports increase 74% by 2030 is correct, U.S. LNG would be responsible for a reduction of 194 million tons of CO_2e per year.[12] Moreover, there can be no summary dismissal of the economic benefits wrought by U.S. LNG exports. Another study published last year found that the U.S. LNG export sector in 2023 directly or indirectly supported 222,450 jobs that earned $23.2 billion in labor income, and

[8] U.S. DOE, Statement from U.S. Secretary of Energy Jennifer M Granholm on Updated Final Analyses (Dec. 17, 2024), https://www.energy.gov/articles/statement-us-secretary-energy-jennifer-m-granholm-updated-final-analyses.

[9] Applying the Social Cost of Carbon, a tool that is no longer in use by the Federal government, the 0.05% cumulative emissions increase translates to a global social cost ranging from $84 billion (2.5% discount) to $250 billion (1.5% discount), assuming that existing policies continue without further constraints on domestic or global emissions.

[10] ICF International, Inc, Lifecycle GHG Emissions of US LNG Exports at vii, viii, 52 and 53 (July 30, 2024) ("2024 ICF Study"), https://www.pagecoalition.com/wp-content/uploads/2024/07/NACEF-LNG-Exports.pdf.

[11] *Id.* at i, 73.

[12] *Id.* at x.

directly or indirectly contributed $43.8 billion to U.S. GDP.[13] And yet another study should have tempered concerns about future price spikes. Specifically, a 2024 Congressional Research Service report shows that domestic natural gas prices remained stable while the U.S. grew from zero LNG exports in 2015 to becoming the world's largest exporter.[14] This price stability occurred despite the DOE previously warning that prices would increase by as much as 54%.[15]

While PAGE appreciates the work that went into preparing the 2024 Study, it would be unwise for the DOE to make a public interest determination solely based on the discussion contained therein. Unfortunately, much of the 2024 Study is focused on matters outside of the DOE's statutory purview, and thus irrelevant to the agency's public interest determination. PAGE thus recommends that the DOE balance the 2024 Study with the plethora of other studies and data demonstrating the value of U.S. LNG exports to the domestic economy, the climate, and geopolitical relationships. With all of the data before it, the DOE can confidently determine that LNG exports to Non-FTA Countries are in the public interest.

A. Potential Statutory Overreach in the 2024 Study.

Traditionally, DOE has followed a methodology to assess the "public interest" in authorizations to Non-FTA Countries that considered the following four factors:

> (i) the domestic need for the natural gas proposed to be exported, (ii) whether the proposed exports pose a threat to the security of domestic natural gas supplies, (iii) whether the arrangement is consistent with DOE's policy of promoting market competition, and (iv) any other factors bearing on the public interest, as determined by DOE.[16]

This methodology used by DOE through and until April 2023 and has been upheld in the federal courts.[17] Application of this methodology also is consistent with the directive issued in President Trump's Executive Order entitled Unleashing American Energy. It directed the Secretary of Energy, in making a public interest determination to "consider the economic and employment impacts to the United States and the impact to the security of allies and partners that would result

---

[13] PwC, Quantifying America's Economic and Energy Opportunity through LNG Exports at 2, 10 (Oct. 2024), https://nam.org/wp-content/uploads/2024/10/Quantifying-Americas-Economic-and-Energy-Opportunity-through-LNG-Exports.pdf

[14] Congressional Research Service, U.S. LNG Exports to Non-FTA Countries: Frequently Asked Questions (Updated Apr. 17, 2024), https://web.archive.org/web/20250211184009/https://crsreports.congress.gov/product/pdf/R/R48038/3.

[15] U.S. Energy Information Administration (EIA), Effect of Increased Natural Gas Exports on Domestic Energy Markets at 9 (Jan. 2012), https://www.energy.gov/sites/prod/files/2013/04/f0/fe_eia_lng.pdf .

[16] Freeport LNG Expansion, L.P., Docket No. 21-98-LNG at 27 (Mar. 3, 2023), https://www.energy.gov/sites/default/files/2023-03/ord4961.pdf; 2023 FLEX Order at 53 (citing supra § III); see also 2024 Study at S-9 (citing Cameron LNG, LLC, FE Docket No. 11-162-LNG, at 8 (U.S. Dep't of Energy May 20, 2014)).

[17] *Sierra Club I*, 867 F.3d at 203 ("For its 'public interest' review, the Department considered various factors such as domestic economic effects (e.g., job creation and tax revenue …) and foreign policy goals (e.g., global fuel diversification and energy security for our foreign trading partners …), in addition to the environmental impacts it examined through the NEPA process.").

from granting the application."[18] Hence, PAGE appreciates that the DOE once again began applying the four-factor "public interest" test when it issued a conditional order to Commonwealth LNG, LLC, subject to the outcome of the 2024 Study proceeding, on February 14, 2025. However, it is unclear to PAGE how the 2024 Study could further inform the application of this test given how far outside the bounds of the NGA, the analysis appears to go.

PAGE is concerned that the 2024 Study does little to further the DOE's statutory public interest review under the NGA. The 2024 Study, while concluding that there is sufficient natural gas to meet domestic and export needs without threatening domestic supplies, thereby addressing the first and second prongs of the DOE's "public interest" test, makes no findings as to the third market competition prong. The bulk of the study's focus falls into the "other" category, conflating the DOE's obligations under section 3 of the NGA with an environmental review conducted under the National Environmental Policy Act ("NEPA"). For example, considerable attention is placed on the impact to "frontline" communities from natural gas exploration and production, as well as terminal siting, matters that are outside of the DOE's statutory control and subject to their own extensive local, state, and federal environmental review processes. While this topic populates one of the study's four appendices,[19] the other three appendices are devoted in some manner to greenhouse gas emissions impacts of U.S. LNG exports.[20] As PAGE is focused on the power of LNG exports to reduce greenhouse gas emissions, the bulk of its comments are in response to the 2024 Study's findings that LNG exports, if permitted to reach a certain threshold, results in modest greenhouse gas emissions increases.

B. Environmental Benefits of Exporting United States LNG

A driving assumption in the 2024 Study is that under the *Defined Policies Scenario (Model Resolved)*, representing a continuation of public policies in place in December 2024 without modifications restricting greenhouse gas emissions, LNG exports will result in a 0.05% increase in cumulative global greenhouse gas emissions by 2050. This is based on a projected export volume of 56.3 Bcf/d, and corresponds to an increase of 6.25 million tons of carbon dioxide equivalent ("$MtCO_2e$") / exajoules ("EJ") in normalized terms.[21] The 2024 Study projects that exports volumes could increase to 70 Bcf/d with greenhouse gas emissions increases increasing to 12.60 $MtCO_2e$/EJ in a sensitivity scenario in which there is higher availability of U.S. natural gas supply at lower prices. However, both export volumes and emissions drop if the United States and/or the rest of the world adopt policies that restrain carbon emissions, such as net-zero commitments. If such commitments are not embraced and the United States does not export LNG, the demand for natural gas does not abate. Rather, the 2024 Study indicates that United States

[18] Exec. Order No. 14154, Unleashing American Energy, § 8(a), 90 Fed. Reg. 8,353, 8357 (Jan. 29, 2025).

[19] 2024 Study, Appendix D: Addendum on Environmental and Community Effects of U.S. LNG Exports.

[20] *Id.*, Appendix A: Global Energy and Greenhouse Gas Implications of U.S. LNG Exports, Appendix B: Domestic Energy, Economic, and Greenhouse Gas Assessment of U.S. LNG Exports, and Appendix C: Consequential Greenhouse Gas Analysis of U.S. LNG Exports.

[21] 2024 Study, Appendix C at C-23 and C-124 (explaining that this rise is from a projected increase of 711 million metric tons ("MMT") carbon dioxide equivalent ("CO2e")). However, the 2024 Study suggests that exports could rise to 70.0 Bcf/d by 2050 in a sensitivity scenario with higher availability of U.S. natural gas supply at lower prices. The Defined Policies are set forth in the 2024 Study, Appendix A-2 at A-50.

supply would be replaced by Middle East gas supply, and result in emissions for the period 2020-2050 that are roughly equivalent to the emissions profile from the same volume of United States' exports.[22] Hence, it is not the presence of United States LNG that is raising the prospect of greenhouse gas emissions. Rather, it is market demand for natural gas.

The 2024 Study does not indicate that the United States or the rest of the world would pursue carbon-free energy, but-for the presence of government mandates and policies constraining carbon emissions. Rather, in a 2024 study published by ICF Incorporated, LLC ("ICF") demonstrated that without United States LNG exported abroad in 2022, that energy would be replaced with 54% coal and 34% fuel oil.[23] Hence, the ICF study validates a crucial point that is a driving force for PAGE, jet unacknowledged in the DOE's 2024 Study—the ability to switch from coal and fuel oil to natural gas delivers an immediate and scalable carbon reduction benefit. Indeed, using cost-effective switching, without any new technologies, natural gas provides an immediate opportunity to cut emissions from coal by 50% and from oil by 30%.[24] A life cycle analysis ("LCA") of the greenhouse gas emissions of United States LNG exports compared to the LCA of other fuels that would be expected to substitute for United States LNG had the LNG not been available for the historical year 2022, primarily coal, demonstrates the value that United States LNG provides as an emissions-reduction tool. In fact, all of the sensitivity cases examined in the study demonstrate that United States LNG exports result in a net reduction in the world's greenhouse gas emissions compared to the use of alternative fuels.[25]

A 2024 Wood Mackenzie study provided a similar conclusion with respect to LNG exports to Asia. The study projected that Asia's LNG demand will nearly double to 510 million tons per annum in 2050, as emerging nations seek a cleaner fuel than coal for power generation.[26] Wood Mackenize projects that the United States will make up 33% of global LNG supply by 2035, assuming LNG projects in the queue for development can move forward. If this were not the case, and the U.S. DOE were to stop granting export authorizations, Asian buyers would need to look beyond the United States to less cost-competitive projects elsewhere in the world, leading to higher LNG prices than many South Asian and Southeast Asian nations can afford. Were this scenario to cause Asia's LNG demand to drop by 30% through to 2035 (based on Wood Mackenzie's projected levels), an additional 95 million tons of coal will be used in the region per annum, leading to an estimated 100 million tons of additional annual CO_2 emissions. This is equivalent of the annual emissions of 20 million cars. Thus, to the extent LNG provides an additional source of natural gas that otherwise would be replaced with coal and fuel oil, its export should be encouraged by the United States, not demonized.

As determined by the International Energy Agency, the impact of just the United States switching from coal-to-gas between 2010 and 2018 saved approximately 500 million tons of CO_2

[22] *See* 2024 Study at A-43 – A-45.

[23] *See* 2024 ICF Study.

[24] International Gas Union (IGU), Global Gas Report 2024 Edition (Aug. 27, 2024), https://www.igu.org/igu-reports/global-gas-report-2024-edition.

[25] *See* 2024 ICF Study at 53.

[26] Wood Mackenzie (2024), Study into Asia's LNG demand to 2050, Prepared for the Asia Natural Gas & Energy Association, https://angeassociation.com/policy-areas/asia-lng-demand-study/.

from being released into the atmosphere.[27] Between 2005 and 2020, natural gas has played a major role in greenhouse gas emission reductions in Germany, the United Kingdom, Japan and the United States, but nowhere has this been more apparent than here where 65% of power sector emissions reductions came from coal-to-gas switching.[28] In fact, in the United States, between 2005 and 2019, emissions dropped by 819 million metric tons.[29] In contrast, global energy-related CO_2 emissions grew by 1.1%, increasing 410 MT to reach a new record high of 37.4 billion tons (Gt) in 2023.[30] Other countries have not had the same success at emissions reductions as they've reverted to relying on coal generation to keep prices stable. In fact, global coal demands were at record levels in 2023, increasing by 3.3% to 8.3 billion tons, with demand from the two largest coal consumers, China and India, offsetting declines elsewhere.[31]

Switching from coal to gas also has a secondary benefit of reducing methane emissions. A study by the Appalachian Methane Initiative found that coal mines and coal mine vents to be largest contributors to total methane emissions.[32] Specifically, non-oil and gas sources were the largest contributors to total methane emissions within the pilot regions, with contributions varying between 53% and 76%, noting that site-level methane emissions estimates in the Appalachian Basin represent the low end of the range of estimates found in other basins in recent peer-reviewed literature. Thus, even though methane is the primary component of natural gas, the production of coal, as opposed to natural gas, is the largest contributor of methane emissions. As indicated in the 2024 ICF study, methane releases related to gas production and along the fuel supply chain continues to decrease due to several factors, including replacement of older equipment, and voluntary emissions reduction actions taking by gas producers and transporters.[33]

C. Economic Benefits from LNG Exports.

The 2024 Study underrepresents the economic benefits derived from producing, transporting, liquefying and exporting LNG. In addition to supporting jobs and growing GDP, as already stated above, the United States LNG industry benefitted federal, state and local governments through the generation of tax revenue. PwC quantified this metric at approximately $11 billion in tax and royalty revenues in 2023.[34] In the state of Pennsylvania, which is home to

---

[27] International Energy Agency (IEA), The Role of Gas in Today's Energy Transitions (July 2019), https://www.iea.org/reports/the-role-of-gas-in-todays-energy-transitions.

[28] U.S. Energy Information Administration (EIA), Electric power sector CO2 emissions drop as generation mix shifts from coal to natural gas (June 9, 2021), https://www.eia.gov/todayinenergy/detail.php?id=48296.

[29] *Id.*

[30] International Energy Agency (IEA), CO2 Emissions in 2023 (Mar. 2024), https://www.iea.org/reports/co2-emissions-in-2023.

[31] International Energy Agency (IEA), Global coal demand set to remain at record levels in 2023 (July 27, 2023), https://www.iea.org/news/global-coal-demand-set-to-remain-at-record-levels-in-2023.

[32] Appalachian Methane Initiative (AMI) (2024), Results of 2023 Pilot Campaign, https://www.businesswire.com/news/home/20240318129568/en/Appalachian-Methane-Initiative-Announces-2023-Pilot-Program-Progress-and-Metrics-Looks-Ahead-to-2024.

[33] 2024 ICF Study at 19-22.

[34] PwC (2024), Quantifying America's Economic and Energy Opportunity through LNG Exports, Prepared for the National Association of Manufacturers (NAM), https://nam.org/wp-content/uploads/2024/10/Quantifying-Americas-Economic-and-Energy-Opportunity-through-LNG-Exports.pdf.

some of the most prolific shale gas deposits in the United States, the jobs impact is pronounced. The natural gas sector supports approximately 123,000 statewide jobs and contributed more than $41 billion in state economic activity in 2022.[35] Additionally, according to a study, the U.S. LNG sector's export capacity is projected to double over the next 5 years and will grow by an average of half a million jobs per year and add approximately $1.3 trillion to the economy through 2040.[36]

D. Geopolitical Benefits of Exporting United States LNG

The statement from former U.S. Secretary of Energy Jennifer Granholm and the scope of the study failed to appreciate the critical role U.S. LNG plays in the energy security and emissions reductions of our allies and partners. It is difficult to overstate the importance of U.S. LNG to geopolitical stability around the world in ways that greatly benefit the public interest. Following the Russian invasion of Europe, U.S. LNG was critical to preventing freezing conditions and blackouts throughout Europe during the energy crisis. The United States was the largest supplier of LNG to Europe in 2023, accounting for 48% of total European LNG imports, which equates to approximately 7.1 billion cubic feet per day (Bcf/d).[37]

At the same time U.S. LNG shipments were able to help our partners and allies, those shipments were unavailable for other parts of the world they were otherwise directed to. In those regions, particularly southeast Asia, we saw a resurgence of coal burning power supply, driving up global emissions. Coal consumption increased 3.3% in 2022, to 8.3 billion tons, reaching an all-time high. In the first half of 2023, demand for coal from the two largest consumers, China and India, grew by over 5%, more than offsetting declines elsewhere.[38] Ultimately, the war in Ukraine and the subsequent energy crisis proved that without U.S. LNG there can be no energy security in Europe. Without an energy secure Europe, there will be fewer emissions reductions. This dynamic will fundamentally undermine the argument that U.S. LNG exports exacerbate climate change. To the contrary, the public interest requires continue LNG exports in order to ensure the continued geopolitical benefits for the U.S. energy security for our allies, and emissions reduction throughout the global power sector.

---

[35] FTI Consulting, Economic and Fiscal Impact of Pennsylvania Shale Gas Development (Aug. 2023), Prepared for the Marcellus Shale Coalition (MSC), https://marcelluscoalition.org/wp-content/uploads/2023/09/Economic-and-Fiscal-Impact-of-Pennsylvania-Shale-Development.pdf.

[36] S&P Global, Major New US Industry at a Crossroads: A US LNG Impact Study – Phase 1 (Dec. 2024), https://www.spglobal.com/en/research-insights/special-reports/major-new-us-industry-at-a-crossroads-us-lng-impact-study-phase-1.

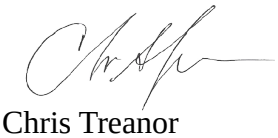
[37] U.S. Energy Information Administration, The United States remained the largest liquefied natural gas supplier to Europe in 2023 (Feb. 29, 2024), https://www.eia.gov/todayinenergy/detail.php?id=61483

[38] International Energy Agency (IEA), Global coal demand set to remain at record levels in 2023 (July 27, 2023), https://www.iea.org/news/global-coal-demand-set-to-remain-at-record-levels-in-2023

II. CONCLUSION

PAGE appreciates the opportunity to respond to the 2024 Study and for the DOE's efforts in continuing to permit the export of domestically produced LNG.

Kindest regards,



Chris Treanor
Executive Director
The Partnership to Address Global Emissions (PAGE)