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Rejecting Venture Global CP2, LNG, LLC: Protecting the Public Interest over Political Agendas The Natural Gas Act of 1938 requires anyone who wishes to import or export natural gas, including liquified natural gas (LNG), to obtain authorization from the Department of Energy (DOE).<sup>1</sup> The NGA remains highly relevant today, as the 2024 DOE Study of LNG Exportation highlights the ambiguity of the term "public interest" - which Congress has never clearly defined - leaving the DOE with broad discretion in making public interest determinations.<sup>2</sup> According to the DOE, this study updates potential effects of U.S. LNG exports on the domestic economy, communities that live near natural gas production and export sites, domestic and international energy security, and the environment and climate.<sup>3</sup> The study identified several major concerns including growth of LNG export terminals and production, increased domestic energy prices, socio-environmental degradation in low-income communities near LNG facilities, and the displacement of renewables rather than fossil fuels in global energy markets.<sup>4</sup> Despite these findings, President Donald Trump enacted Executive Order 14154, "Unleashing American Energy" which lifts the pause on issuing LNG export permits to countries without a Free Trade Agreement with the U.S.<sup>5</sup> President Trump argues that expanding LNG exports serves the public interest by strengthening "America's affordable and reliable energy and natural resources."<sup>6</sup> However, this contrasts the DOE's findings, which suggest that unrestricted LNG exports could impose economic burdens on U.S. consumers and increase environmental risks. One of the most controversial projects that could get approved under this executive order is Venture Global CP2, LNG, LLC, a massive export terminal planned to be built in Cameron Parish, Louisiana. Given

<sup>&</sup>lt;sup>1</sup>U.S. Department of Energy, "Regulation." *U.S. Department of Energy*. <u>https://www.energy.gov/fecm/regulation</u>. <sup>2</sup> Ratner, Michael. "Executive Orders and U.S. LNG Exports: Frequently Asked Questions." *Library of Congress*, (February 6, 2025): 2 <u>https://www.congress.gov/crs-product/R48038</u>.

<sup>&</sup>lt;sup>3</sup> U.S. Department of Energy, "2024 LNG Export Study: Energy, Economic, and Environmental Assessment of U.S. LNG Export." U.S. *Department of Energy*. <u>https://fossil.energy.gov/app/docketindex/docket/index/30</u>

<sup>&</sup>lt;sup>4</sup> Granholm, Jennifer M. "Statement from U.S. Secretary of Energy Jennifer M. Granholm on Updated Final Analyses." U.S. Department of Energy, (December 17, 2024).

https://www.energy.gov/articles/statement-us-secretary-energy-jennifer-m-granholm-updated-final-analyses <sup>5</sup> Ratner, Michael. "Executive Orders and U.S. LNG Exports: Frequently Asked Questions." *Library of Congress*, (February 6, 2025): 2 https://www.congress.gov/crs-product/R48038.

<sup>&</sup>lt;sup>6</sup> Trump, Donald J. "Unleashing American Energy." *The White House,* (January 20, 2025) <u>https://www.whitehouse.gov/presidential-actions/2025/01/unleashing-american-energy/</u>

the DOE's findings, approving this terminal would not serve the public interest, but rather exacerbate the economic and environmental challenges outlined in the study.

The DOE must reject Venture Global CP2 because exporting additional LNG is both unnecessary and harmful, contributing to higher greenhouse gas (GHG) emissions and geopolitical tensions between Trump and other world leaders. The proposed project "will ship nearly 4 billion cubic feet per day of gas when completed. For comparison, "The U.S. exported 11.4 billion cubic feet per day of gas in 2023, enough to power millions of homes and industrial operations."<sup>7</sup> An export terminal of this capacity would, "yield more annual greenhouse gas emissions by itself than 141 of the world's countries each did in 2023."8 In a recent Environmental Impact Statement done by the Federal Energy Regulatory Commission (FERC), they concluded that there would be no significant emissions within the area and limited negative air quality impacts.<sup>9</sup> However, the DOE's 2024 study contradicts this conclusion, finding that an increase in LNG exports will lead to a 1-2% rise in domestic energy-related CO2 emissions by 2050, reflecting greater emissions associated with the production, transportation, and liquefaction of natural gas for export.<sup>10</sup> Trump's energy mandate will only exacerbate this problem as he claims that LNG exportation will be good for America's economy and national security.<sup>11</sup> Globally, countries feel compelled to buy American LNG to avoid political tensions and facing potential U.S. tariffs under President Trump.<sup>12</sup> Overall, approving Venture Global CP2 not only contradicts the DOE's 2024 study findings, but it also locks the US and its allies into an unsustainable priority of fossil fuel usage in order to maintain political appeasement.

Beyond emissions and geopolitical concerns, the DOE's 2024 study also highlights socioeconomic consequences of LNG exportation, including increased domestic energy prices, disproportionate environmental burdens on marginalized communities, and the displacement of

<sup>8</sup> Granholm, "Statement from U.S. Secretary of Energy Jennifer M. Granholm on Updated Final Analyses."

https://elibrary.ferc.gov/eLibrary/filelist?accession\_number=20250207-3023

<sup>11</sup> Trump,. "Unleashing American Energy."

 <sup>&</sup>lt;sup>7</sup> Dabbs, Brian. "DOE delays approvals for 2 major LNG projects." *Energywire*, (December 11, 2024).
<u>https://subscriber.politicopro.com/article/eenews/2024/12/11/doe-delays-approvals-for-2-major-lng-projects-001935</u>
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<sup>&</sup>lt;sup>9</sup> Federal Energy Regulatory Commission, "CP2 LNG and CP Express Pipeline Projects." *Federal Energy Regulatory Commission*, (February 7, 2025): 21, 22

<sup>&</sup>lt;sup>10</sup> U.S. Department of Energy, "Appendix B: Domestic Energy, Economic, and GHG Assessment of U.S. LNG Exports." *Industrial Economics, Incorporated,* (December 17, 2024): B-3 https://www.energy.gov/sites/default/files/2024-12/LNGUpdate AppendixB Dec2024.pdf

https://www.whitehouse.gov/presidential-actions/2025/01/unleashing-american-energy/ <sup>12</sup> Steinlein, Jasper. "Europe doesn't need US gas, but might buy it anyway." *Euractiv*, (January 27, 2025). https://www.euractiv.com/section/eet/news/europe-doesnt-need-us-gas-but-might-buy-it-anyway/

renewable energy investments. The 2024 DOE study found that domestic consumers of natural gas would face a 30% increase in prices,<sup>13</sup> specifically hurting middle and low-income households whose energy burden threshold is over 6%.<sup>14</sup> "High energy burdens are often defined as allocating greater than 6% of income towards energy costs, while severe energy burdens are those greater than 10% of income."<sup>15</sup> Along with middle to lower income consumers, Black, Indigenous, and people of color often experience the highest energy burdens when compared to more affluent or white households because of historical discriminatory housing policies, redlining, and differences in housing stock in the United States.<sup>16</sup> LNG exports will also affect American industry by raising the industrial sector's energy costs, affecting prices of consumer goods, and increasing the volatility of domestic natural gas prices.<sup>17</sup> Environmentally, residents of Southern Louisiana bear the burden of injustices at key terminal points. Roishetta Ozane, CEO of The Vessel Project of Louisiana, has seen these issues firsthand: "The expansion of liquefied natural gas exports puts [her] family at risk while prioritizing corporate profits over health and safety...Local water is undrinkable, wetlands are disappearing, and the pollution often exceeds legal limits, poisoning [her] community's air."<sup>18</sup> Ozane suggests that communities affected by LNG exports should feel empowered to "reclaim their agency and demand accountability from those in power."<sup>19</sup> Consumers should advocate for cleaner energy options, as these are more sustainable for the future. Continued investment in LNG infrastructure diverts resources away from the expansion of renewable energy, delaying a transition to cleaner, affordable energy that would lessen our reliance on fossil fuels. The 2024 DOE Study shows that, "additional U.S. LNG exports displace more renewables than coal globally... and despite very aggressive assumptions in the model regarding deployment of carbon capture, utilization, and storage LNG exports would still be expected to increase global net emissions."<sup>20</sup> Instead of serving the public interest, expanding LNG exports will deepen economic inequalities, worsen environmental

<sup>&</sup>lt;sup>13</sup>Granholm, "Statement from U.S. Secretary of Energy Jennifer M. Granholm on Updated Final Analyses."

 <sup>&</sup>lt;sup>14</sup> Sierra Club, "Energy Burden Calculator." *Sierra Club*, <u>https://www.sierraclub.org/energy-burden-calculator</u>
<sup>15</sup> Ibid.

<sup>&</sup>lt;sup>16</sup> Drehobl et al., "How High Are Household Energy Burdens?" *American Council for Energy-Efficient Economy*, (September 2020): 2. <u>https://www.aceee.org/sites/default/files/pdfs/u2006.pdf</u>

<sup>&</sup>lt;sup>17</sup> Granholm, "Statement from U.S. Secretary of Energy Jennifer M. Granholm on Updated Final Analyses."

 <sup>&</sup>lt;sup>18</sup> Ozane, Roishetta. "LNG proliferation places Louisiana communities at a climate crossroads." *Louisiana Proliferator*, (January 12, 2025). <u>https://lailluminator.com/2025/01/12/lng-louisiana</u>
<sup>19</sup> Ibid.

<sup>&</sup>lt;sup>20</sup> Granholm, Jennifer M. "Statement from U.S. Secretary of Energy Jennifer M. Granholm on Updated Final Analyses." U.S. Department of Energy, (December 17, 2024).

https://www.energy.gov/articles/statement-us-secretary-energy-jennifer-m-granholm-updated-final-analyses

injustices, and make it impossible to strive towards a renewable energy transition, ultimately worsening the global state of the climate.

The DOE must reject the Venture Global CP2 export terminal application because it directly contradicts the findings of the 2024 DOE Study. Increased LNG exports would lead to increased GHG emissions, heightened geopolitical concerns, rising domestic energy prices, greater environmental injustices, and the displacement of renewable energy. Approving Venture Global CP2 would prioritize Trump's agenda to lock countries into political LNG agreements over American welfare, while also exacerbating climate and economic instability. In order to truly serve the public interest, the DOE must reject this harmful expansion of LNG infrastructure.