

UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL ENERGY

Cameron LNG, LLC

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FE Docket No. 11-162-LNG

LCA GHG Report Comments

COMMENTS OF CAMERON LNG, LLC

Pursuant to the Department of Energy Office of Fossil Energy's ("DOE/FE") notice dated May 29, 2014,¹ Cameron LNG, LLC ("Cameron LNG") submits these comments on the report *Life Cycle Greenhouse Gas Perspective on Exporting Liquefied Natural Gas from the United States* ("LCA GHG Report"). Cameron LNG is the applicant in FE Docket No. 11-162-LNG, one of the proceedings in which DOE/FE posted the LCA GHG Report and sought comment.

The LCA GHG Report compares life cycle GHG emissions from U.S. LNG exports to regional coal and other imported natural gas for electric power generation in Europe and Asia.² The results of the study generally favor U.S. LNG exports as a fuel source for power generation as compared to regional coal supplies.

The study reveals that in general "for most scenarios in both the European and Asian regions, the generation of power from imported natural gas has lower life cycle GHG emissions than power generation from regional coal."³ In particular, on a 100-year basis, natural gas power results in 25 to 61 percent less emissions than coal for Europe and 18 to 59 percent less than coal for Asia.⁴ On a 20-year basis, there is still potential for natural gas to have up to 57% lower

¹ *Life Cycle Greenhouse Gas Perspective on Exporting Liquefied Natural Gas from the United States*, 79 Fed. Reg. 32260 (June 4, 2014).

² *Id.*

³ LCA GHG Report at 9.

⁴ *Id.* at 12.

GHG emissions than coal in both Europe and Asia, with only a relatively small possibility that U.S. LNG and regional coal have comparable emissions for the Asian market.⁵ At a bare minimum, the study conservatively concludes that “the use of U.S. LNG exports for power production in European and Asian markets will not increase GHG emission, on a life cycle perspective, when compared to regional coal extraction and consumption for power production.”⁶

These results are consistent with the information Cameron LNG provided in its application in this proceeding.⁷ The export of LNG provides consuming nations with access to low carbon natural gas as an alternative to higher emissions fuels. The United States has a strong interest in encouraging the world’s energy consumers to take advantage of a global boom in natural gas to help reduce GHG emissions.

In light of the above, Cameron LNG respectfully requests that DOE/FE act expeditiously to issue Cameron’s final order in respect of its pending application after the comment period closes.

Respectfully submitted,

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⁵ See *id.* at 12–13.

⁶ *Id.* at 18.

⁷ See Application of Cameron LNG, LLC for Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Countries at 27–28 (Dec. 21, 2011).

CERTIFICATE OF SERVICE

I hereby certify that, in accordance with 10 C.F.R. § 590.107 (2014), I caused a copy of the foregoing to be served on the following this 21st day of July, 2014:

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