



SIDSDOCK
SMALL ISLAND DEVELOPING STATES
ISLAND ENERGY FOR ISLAND LIFE

February 12, 2016

U.S. Department of Energy (FE-34)
Office of Regulation and International
Engagement, Office of Fossil Energy
P.O. Box 44375
Washington, DC 20026-4375

Re: Request for Comments - 2014 EIA LNG Export Study and 2015 LNG Export Study (80 Fed. Reg. 81300)

These comments are submitted on behalf of SIDS DOCK, an international intergovernmental organization (recognized as such by the United Nations), which assists and represents the interests of the world's small islands and low lying coastal nations (32 in number) in their efforts to develop sustainable clean energy economies. We appreciate the opportunity to submit comments on this important issue because our members are among the world's nations that will be most directly affected by the U.S. Department of Energy's decisions on this issue.

SIDS DOCK's genesis, purposes and mission are discussed in some detail on the organization's website: www.sidsdock.org and, in particular, in the linked video: <http://sidsdock.org/what-is-sids-dock> prepared at the time of the U.N. inaugural ceremony recognizing SIDS DOCK as a U.N. cooperating agency.

As the Department of Energy ("DOE") should be aware, the small islands and coastal nations which SIDS DOCK represents have contributed little to global climate change, but face the greatest and most immediate risk from rising sea levels and adverse weather changes associated with that phenomenon. As DOE may also be aware, the small island voices were among those widely heard and respected at the recent COP 21 meeting in Paris, and the U.S. and other nations throughout the world made strong commitments to assist our islands and coastal nations in meeting the challenges posed by global climate change.

While SIDS DOCK has limited expertise in addressing the narrow economic issues addressed in the subject study, we do believe that the credentials outlined above give us a special standing to address the way in which narrow economic studies such as this are being used to determine the "public interests" of a great nation, to appeal to the Agency's conscience and to encourage the Agency to look outward, as well as inward, in determining where the U.S.' "public interest" lies.

Heads of State Council
The Hon. Dr. Ralph Everard Gonsalves
Prime Minister
Saint Vincent and the Grenadines

The Hon. Henry Tuakeu Puna
Prime Minister
Cook Islands

The Right Hon. Dr. Keith Mitchell
Prime Minister
Grenada

Founders
Alliance of Small Island States
Caribbean Community
Climate Change Centre
Secretariat of the Pacific Regional
Environment Programme

-  Antigua & Barbuda
-  Bahamas (Commonwealth of The)
-  Barbados
-  Belize
-  Cook Islands
-  Dominica (Commonwealth of)
-  Dominican Republic
-  Fiji (Republic of)
-  Grenada
-  Guyana
-  Korea (Republic of)
-  Maldives (Republic of The)
-  Marshall Islands (Republic of The)
-  Mauritius (Republic of The)
-  Micronesia (Federated States of)
-  Nauru (Republic of)
-  Niue
-  Palau (Republic of)
-  Saint Kitts & Nevis
-  Saint Lucia
-  Saint Vincent & the Grenadines
-  Samoa (Independent State of)
-  São Tomé and Príncipe (Democratic Republic of)
-  Seychelles (Republic of)
-  Solomon Islands
-  Suriname (Republic of)
-  Tonga (Kingdom of)
-  Trinidad & Tobago (Republic of)
-  Tuvalu
-  Vanuatu (Republic of)



Page 2

First, we should make clear that while SIDS DOCK's long term objectives emphasize the need for clean, sustainable, renewable energy and eventual elimination of reliance on fossil fuels, we also recognize that, at least in the near- and medium-term, access to natural gas and natural gas related products will be an essential part of our islands' plans for clean and sustainable energy economies. Our current dependence on coal, heavy diesel and similar fossil fuel products both for power generation and transportation uses must be diminished. Natural gas products are the most likely candidates for accomplishing this objective in the near term.

President Obama has recognized our critical need to transition to cleaner and more economic energy sources: <http://go.wh.gov/ZmANS2>.

Vice President Biden has recognized that natural gas is an important resource for this transition: <https://www.whitehouse.gov/the-press-office/2015/01/26/remarks-vice-president-biden-caribbean-energy-security-initiative>.

Secretary Moniz has as well: http://www.jamaicaobserver.com/news/Jamaica--US-sign-energy-cooperation-agreement_18724881.

The U.S. has entered into agreements and understandings with islands in the Caribbean which contemplate a role for natural gas products in the Caribbean Energy Security Initiative, announced by the President last April, and discussions are being held regarding similar understandings for territories and island nations in the Pacific.

In light of all of these commitments and discussions and the U.S. Administration's strong commitment to reduction of the threats posed by climate change, it seems inappropriate for the U.S. Department of Energy to base "public interest" determinations on the parsing of economic details to determine whether any U.S. industry segment might suffer adverse impacts. At a time when the U.S. allows unlimited exports of coal, bitumen and crude oil; and when so many of the studies suggest that impacts of exports on U.S. industries might be marginal, at most, this is, in our view, a shortsighted policy which is directly contrary to commitments that the U.S. has made and in the long run, to the U.S.' public interest.

SIDS DOCK respectfully requests that DOE revise its approach to public interest determinations. We believe that international comity and the commitments and understandings discussed above call for a determination that U.S.' natural gas will be made available, at least to your nation's friends and allies, on a fair and non-discriminatory basis. This is particularly true with respect to our island nations which the U.S. has unequivocally stated to be its friends and allies and whose transition to clean, economic, sustainable economies to be definitely in the U.S. public interest. There is no reason to differentiate between those nations which SIDS DOCK represents which have not yet entered into Free Trade Agreements and those which have. All of our member nations should be viewed as the U.S.' close partners in the effort to reduce and mitigate carbon emissions and treated as such with respect to access to clean energy resources such as natural gas and technologies such as wind, solar and geothermal.



Page 3

While we fully support regulation of production to minimize the release of greenhouse gases, export regulation should not be a substitute for such regulation. From our perspective, the restriction of natural gas exports to our islands and low lying coastal nations discriminates against these nations *vis a vis* U.S. and FTA nation users and, perhaps more importantly, will simply encourage continued reliance on coal, heavy diesel, bitumen and other dirtier fuels. We urgently seek policy changes to avoid that eventuality.

Please feel free to call on us if further information on this subject is needed. Your careful consideration of these comments is greatly appreciated.

Please accept the assurances of my highest consideration.

Sincerely,

H.E. Dr. Vince Henderson
Ambassador Plenipotentiary and Permanent
Representative of the Commonwealth of Dominica
to the United Nations
Chair, SIDS DOCK Steering Committee