



Industrial Energy Consumers of America

The Voice of the Industrial Energy Consumers

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October 21, 2019

U.S. Department of Energy (FE-34)
Attn: LCA GHG Update Comments
Office of Regulation, Analysis, and Engagement
Office of Fossil Energy
P.O. Box 44375
Washington, DC 20026-4375

Re: Life Cycle Greenhouse Gas Perspective on Exporting Liquefied Natural Gas from the United States: 2019 Update (Docket No. 2019-20230)

The accounting for life-cycle greenhouse gases (GHGs) for LNG exports need to include the following:

1. The GHG emissions from natural gas electricity consumption to compress the natural gas into LNG and operate the entire facility, regardless of whether the electricity is generated on or offsite. These numbers are very significant.
2. The GHG emissions from the LNG liquefaction processes inside-the-fence line. This includes CO₂, methane, and GHG emissions used to support the refrigeration process, among others. The use of natural gas or other fossil fuels to operate the facility.
3. Methane emissions inside-the-fence line, including loading or unloading of LNG.
4. Methane emissions from pipelines used to serve the facility. Use the EIA/EPA national average natural gas pipeline methane leakage rates per Mcf.
5. National average EIA/EPA GHG emissions from drilling an oil and natural gas wells for a volume equal to what enters the fence line of the facility, plus power generation if it is purchased.

Thank you for the opportunity to make comments.

Sincerely,

Paul Cicio
President

The Industrial Energy Consumers of America is a nonpartisan association of leading manufacturing companies with \$1.0 trillion in annual sales, over 3,700 facilities nationwide, and with more than 1.7 million employees worldwide. It is an organization created to promote the interests of manufacturing companies through advocacy and collaboration for which the availability, use and cost of energy, power or feedstock play a significant role in their ability to compete in domestic and world markets. IECA membership represents a diverse set of industries including: chemicals, plastics, steel, iron ore, aluminum, paper, food processing, fertilizer, insulation, glass, industrial gases, pharmaceutical, building products, automotive, brewing, independent oil refining, and cement.