UNITED STATES OF AMERICA DEPARTMENT OF ENERGY OFFICE OF FOSSIL ENERGY

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Cameron LNG, LLC

FE Docket No. 11-145-LNG

APPLICATION OF CAMERON LNG, LLC FOR LIMITED EXTENSION TO START DATE OF TERM OF AUTHORIZATION

Pursuant to Section 3 of the Natural Gas Act ("NGA")¹ and Part 590 of the regulations of the United States Department of Energy ("DOE"),² Cameron LNG, LLC ("Cameron LNG") submits this application ("Application") to DOE, Office of Fossil Energy ("DOE/FE") for a limited extension of the latest start date applicable to the 20-year term of the authorization to export liquefied natural gas ("LNG") to FTA countries granted to Cameron LNG in the captioned proceeding in Order No. 3059. Specifically, Cameron LNG requests that the latest start date for the authorization term be extended from January 17, 2019, to July 17, 2019, as discussed herein.

In support of this Application, Cameron LNG respectfully states the following:

I. COMMUNICATIONS AND CORRESPONDENCE

Any notices, pleadings or other communications concerning this Application should be addressed to:

¹ 15 U.S.C. § 717b (2012).

² 10 C.F.R. Part 590 (2018).

Brett A. Snyder Mark R. Haskell Cadwalader, Wickersham & Taft LLP 700 6th Street, NW, Suite 1200 Washington, D.C. 20001 (202) 862-2252 brett.snyder@cwt.com mark.haskell@cwt.com

Blair Woodward General Counsel Cameron LNG, LLC 2925 Briarpark Drive, Suite 1000 Houston, TX 77042 (832) 783-5582 bwoodward@cameronlng.com

II. DESCRIPTION OF THE APPLICANT

Cameron LNG's exact legal name is Cameron LNG, LLC. Cameron LNG is a limited liability company organized under the laws of Delaware. Cameron LNG is an indirect subsidiary of Sempra Energy, Total S.A.,³ Mitsui & Co., Ltd., Mitsubishi Corporation, and Nippon Yusen Kabushiki Kaisha. Cameron LNG's executive offices are located at 2925 Briarpark Drive, Suite 1000, Houston, Texas 77042. Cameron LNG owns and operates the Cameron Terminal in Cameron and Calcasieu Parishes, Louisiana, and is currently constructing its Liquefaction Project as an addition to the Cameron Terminal that was authorized by the Federal Energy Regulatory Commission in Docket No. CP13-25-000.

³ On March 23, 2018, Cameron LNG filed a Statement of Proposed Change in Control, indicating that ENGIE S.A.'s interest in Cameron LNG would be transferred to Total S.A. *See Statement of Proposed Change in Control of Cameron LNG, LLC,* FE Docket Nos. 11-145-LNG, *et al.* (March 23, 2018). As to Order No. 3059 and Cameron LNG's other FTA authorizations, DOE/FE acknowledged the Statement by letter and indicated that the proposed transfer would take effect immediately upon closing. *See* Letter from Amy Sweeney, Director, Division of Natural Gas Regulation, to Brett A. Snyder, Cadwalader, Wickersham & Taft LLP, at 2, FE Docket Nos. 11-145-LNG, *et al.* (April 20, 2018). The transaction closed on July 13, 2018.

Cameron LNG currently holds six long-term export authorizations from DOE/FE, as follows:

| | FTA | Non-FTA |
|---------------------|------------------------------|--------------------------------|
| Trains 1–3 | Order No. 3059 11-145-LNG | Order No. 3391-A 11-162-LNG |
| | 11-143-LING | 11-102-LNG |
| Trains 1–3 | Order No. 3620 | Order No. 3797 |
| Incremental volumes | 14-204-LNG | 15-67-LNG |
| Trains 4–5 | Order No. 3680 | Order No. 3846 |
| | 15-36-LNG | 15-90-LNG |

This Application pertains only to the authorization granted in Order No. 3059. This authorization permits Cameron LNG to export up to 620 Bcf per year to any nation with which the United States has, or in the future may enter into, an FTA requiring national treatment for trade in natural gas. DOE/FE issued Order No. 3059 on January 17, 2012.⁴

Ordering paragraph A of Order No. 3059 states the following with respect to the start of

the authorization term:

Cameron [LNG] is authorized to export domestically produced LNG by vessel from the Cameron Terminal in Cameron Parish, Louisiana, up to the equivalent of 620 Bcf per year of natural gas (12 mtpa) for a 20-year term, beginning on the earlier of the date of first export or seven years from the date the authorization is issued (January 17, 2019), pursuant to one or more long-term contracts that do not exceed the term of this authorization.⁵

Thus, the latest start date for the term of the authorization granted in Order No. 3059 is January 17,

2019.

⁴ *Cameron LNG, LLC*, DOE/FE Order No. 3059, FE Docket No. 11-145-LNG (2012).

⁵ *Id.* at 6.

III. AUTHORIZATION REQUESTED

In this Application, Cameron LNG requests that the latest start date of the term of the authorization in Order No. 3059 as specified in ordering paragraph A be extended from January 17, 2019, to July 17, 2019. Cameron LNG is seeking this limited, six-month extension to the latest start date to accommodate the current construction schedule.

Nothing in this Application is intended to supersede or otherwise modify the export authorizations granted to Cameron LNG in any order other than Order No. 3059.

IV. STANDARD OF REVIEW

Under Section 3(c) of the NGA, as amended, an application for authorization to export natural gas, including LNG, to any "nation with which there is in effect a free trade agreement requiring national treatment for trade in natural gas, shall be deemed to be consistent with the public interest, and ... shall be granted without modification or delay."⁶ In light of this statutory obligation, DOE/FE has found that it need not engage in any analysis of factors affecting the public interest.⁷ As this Application falls within Section 3(c), it should be processed and approved in accordance with this standard.

VI. APPENDICES

The following appendices are included with this Application:

Appendix A Verification

Appendix B Opinion of Counsel

⁶ 15 U.S.C. § 717b(c).

⁷ See, e.g., Cameron LNG, LLC, Order No. 3680, FE Docket No. 15-36-LNG, at 7 (July 10, 2015); Order No. 3059 at 5.

VII. CONCLUSION

For the reasons set forth above, Cameron LNG respectfully requests that the latest start date of the term of the authorization in Order No. 3059 be extended as discussed herein.

Respectfully submitted,

/s/ Brett A. Snyder

Brett A. Snyder Mark R. Haskell Cadwalader, Wickersham & Taft LLP 700 6th Street, NW, Suite 1200 Washington, D.C. 20001 (202) 862-2200 brett.snyder@cwt.com mark.haskell@cwt.com

Dated: July 16, 2018

APPENDIX A

VERIFICATION

County of Harris State of Texas

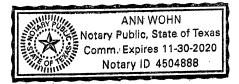
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BEFORE ME, the undersigned authority, on this day personally appeared Blair Woodward, who, having been by me first duly sworn, on oath says that he is General Counsel and Corporate Secretary for Cameron LNG, LLC, and is duly authorized to make this Verification on behalf of such company, that he has read the foregoing instrument, and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

Blair Woodward

SWORN TO AND SUBSCRIBED before me on the 16th day of July, 2018.



APPENDIX B

OPINION OF COUNSEL

July 16, 2018

Amy Sweeney Director, Division of Natural Gas Regulation U.S. Department of Energy 1000 Independence Avenue, S.W. Washington, DC 20585

RE: Application of Cameron LNG, LLC for Limited Extension to Start Date of Term of Authorization

Dear Ms. Sweeney:

This opinion of counsel is submitted pursuant to section 590.202(c) of the regulations of the United States Department of Energy, 10 C.F.R. § 590.202(c) (2018). I am counsel to Cameron LNG, LLC ("Cameron LNG"). I have reviewed the organizational and internal governance documents of Cameron LNG and it is my opinion that the proposed export of natural gas as described in the application filed by Cameron LNG, to which this Opinion of Counsel is attached as Appendix B, is within the company powers of Cameron LNG.

Respectfully submitted,

Blair Woodward Counsel to Cameron LNG, LLC

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document filed with the Department of Energy, Office of Fossil Energy upon the designated representatives of all parties to this proceeding in accordance with 10 C.F.R. § 590.107(a).

Dated: July 16, 2018

<u>/s Nelli Doroshkin</u> Nelli Doroshkin Cadwalader, Wickersham & Taft LLP 700 Sixth Street, NW Washington, DC 20001 Tel: (202) 862-2392 Fax: (202) 862-2400 nelli.doroshkin@cwt.com