## UNITED STATES OF AMERICA BEFORE THE DEPARTMENT OF ENERGY/ OFFICE OF FOSSIL ENERGY

Excelerate Liquefaction Solutions I, LLC ) FE Docket No. 12-146-LNG

## EXCELERATE LIQUEFACTION SOLUTIONS I, LLC'S REQUEST FOR AN EXTENSION OF TIME TO ANSWER PROTESTS

Pursuant to 10 C.F.R. § 590.304, Excelerate Liquefaction Solutions I, LLC ("ELS I") requests that the DOE Office of Fossil Energy ("OFE") grant ELS I an extension of time to file an answer to the protests of the Sierra Club and the American Public Gas Association ("APGA"). ELS I requests a 15-day extension, until March 6, 2013. The OFE has granted similar requests in prior proceedings.

On October 5, 2012, ELS I filed an application for authorization to export LNG to nonfree trade nations. The OFE noticed that application on November 30, 2012, and several parties, including the Sierra Club and the APGA, filed interventions and protests on February 4, 2013. OFE's regulations typically require an answer to a protest within fifteen days.

The issues raised in Sierra Club's and APGA's protests are numerous and complex – the Sierra Club's brief alone was nearly seventy pages long with thousands of pages of attachments. ELS I requires additional time to respond to these arguments.

Moreover, because the OFE has delayed issuing orders in these types of proceedings until evaluation of the 2012 Export Studies are finished, no party is harmed by ELS I's request for an extension.

The OFE has granted similar requests in the past. See, e.g., Freeport LNG Expansion L.P. et al., FE Docket No. 11-161-LNG (May 3, 2012 Letter Order granting 15-day extension of

time); *Gulf Coast LNG Export, LLC*, FE Docket No. 12-05-LNG (August 17, 2012 Letter Order granting 13-day extension of time).

Wherefore, for the foregoing reasons, ELS I requests an extension of time, until March 6, 2013, for filing answers to the protests filed in this docket.

Respectfully Submitted,

/s/ G. Gail Watkins G. Gail Watkins Fulbright & Jaworski, L.L.P. 1301 McKinney, Suite 5100 Houston, TX 77010 Tel: (713) 651-5127 Fax: (713) 651-5246 Email: gwatkins@fulbright.com

Filed: February 14, 2013

## **<u>Certificate of Service</u>**

I certify that I have this day served copies of the foregoing document filed with the DOE/FE on the designated representatives of all of the parties to this proceeding, in accordance with 10 C.F.R. § 590.107(a).

Dated at Washington, DC, February 14, 2013.

<u>/s/ Jeffrey Williamson</u> Jeffrey J. Williamson Fulbright & Jaworski, L.L.P.