

**UNITED STATES OF AMERICA
BEFORE THE
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL ENERGY**

ConocoPhillips Alaska Natural Gas Corporation)
)
)

FE Docket No. 13-155-LNG

**MOTION FOR LEAVE TO INTERVENE AND COMMENTS
OF THE AMERICAN PUBLIC GAS ASSOCIATION**

Pursuant to Section 590.303 of the Administrative Procedures with Respect to the Import and Export of Natural Gas,¹ the American Public Gas Association (“APGA”) files this motion to intervene and comments in the above-captioned proceeding. In support, APGA states the following:

I. COMMUNICATIONS

Any communications regarding this pleading or this proceeding should be addressed to:

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American Public Gas Association
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¹ 10 C.F. R. § 590.303 (2012).

II. INTERVENTION

APGA is the national, non-profit association of publicly-owned natural gas distribution systems, with over 700 members in 36 states. Overall, there are some 950 publicly-owned systems in the United States. Publicly-owned gas systems are not-for-profit retail distribution entities that are owned by, and accountable to, the citizens they serve. They include municipal gas distribution systems, public utility districts, county districts, and other public agencies that have natural gas distribution facilities. APGA members purchase interstate natural gas transportation services, usually as captive customers of a single interstate pipeline, at rates and under terms and conditions that are regulated by the Federal Energy Regulatory Commission (“FERC”). APGA’s members are active participants in the domestic market for natural gas where they secure the supplies of natural gas to serve their end users.

On December 11, 2013, ConocoPhillips Alaska Natural Gas Corporation (“ConocoPhillips”) filed an application in this docket seeking authorization to export to any country with which the United States does not have a Free Trade Agreement up to the equivalent of 40 billion cubic feet on a cumulative basis over a two-year period from facilities located in the Cook Inlet near Kenai, Alaska. LNG exports generally have the recognized potential to impact the price of natural gas in the United States; APGA’s interest in such proceedings has been recognized as sufficient to warrant intervenor status.²

APGA has a continuing concern with the export of natural gas to non-FTA countries and thus has a direct and substantial interest in this proceeding that cannot be adequately represented by any other party. APGA respectfully submits that good cause exists to grant its motion to intervene.

² *E.g.*, DOE/FE Order No. 3357 issued Nov. 15, 2013, Docket No. 11-161-NG, at p. 147.

III. COMMENTS

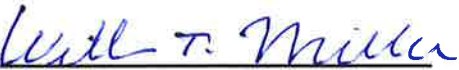
APGA has intervened and protested virtually every request to export LNG from the United States to a non-FTA country, pointing out that such authorization would be inconsistent with the public interest because, among other things, it would substantially raise gas prices to American consumers, the burden of which will largely fall on low and middle income consumers of natural gas and electricity; defeat the efforts of the United States to achieve energy independence; undermine the emerging American renaissance in manufacturing; and frustrate the Administration's efforts to lessen greenhouse gas emissions in the United States. However, given the nature of the subject transaction, including most essentially the fact that it involves the export of limited volumes of LNG from a State outside of the continental United States that does not have pipeline access to the lower 48 States and thus should not affect in any material manner the prices paid by natural gas customers within the continental United States, APGA is not protesting the subject filing; however, it will monitor this filing such that if it appears that the conclusion stated above about no likely adverse impact to consumers in the lower 48 States is mistaken, APGA will comment further.

IV. CONCLUSION

WHEREFORE, based on the foregoing, APGA respectfully requests that the DOE/FE grant its motion to intervene in this proceeding with all rights appurtenant to that status.

Respectfully submitted,

AMERICAN PUBLIC GAS ASSOCIATION

By 

William T. Miller
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1015 Fifteenth Street, N.W.
Washington, DC 20005

Its Attorneys

February 28, 2014

UNITED STATES OF AMERICA
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ConocoPhillips Alaska Natural Gas Corporation)
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VERIFICATION

WASHINGTON

§

§

DISTRICT OF COLUMBIA

§

Pursuant to 10 C.F.R. § 590.103(b) (2012), William T. Miller, being duly sworn, affirms that he is authorized to execute this verification, that he has read the foregoing document, and that all facts stated herein are true and correct to the best of his knowledge, information, and belief.

William T. Miller

William T. Miller
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Subscribed and sworn to before me this 28th day of February 2014.

Leslie K. Nelson-Walski

Notary Public

My Commission Expires:

LESUE K. NELSON-WALSKI
Notary Public, District of Columbia
My Commission Expires May 31, 2015

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CERTIFIED STATEMENT OF AUTHORIZED REPRESENTATIVE

Pursuant to 10 C.F.R. § 590.103(b) (2012), I, William T. Miller, hereby certify that I am a duly authorized representative of the American Public Gas Association, and that I am authorized to sign and file with the Department of Energy, Office of Fossil Energy, on behalf of the American Public Gas Association, the foregoing document and in the above-captioned proceeding.

Dated at Washington, D.C., this 28th day of February, 2014.



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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon on the applicant and on DOE/FE for inclusion in the FE docket in the proceeding in accordance with 10 C.F.R. § 590.107(b) (2012).

Dated at Washington, D.C., this 28th day of February, 2014.

By: 

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