

UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL ENERGY

IN THE MATTER OF)
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Gasfin Development USA, LLC) 13 – 161- LNG
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)

Sierra Club’s Filing of The “LNG Export Study” Economic Impact Materials

Attached please find copies of the two part “LNG Export Study” commissioned by the Department of Energy, consisting of analyses by the Energy Information Administration and NERA Economic Consulting, together with comments submitted by Sierra Club, *et al.*, on the NERA Study.

These materials pertain to the impacts of the LNG exports proposed in this docket. These materials should *already* be considered part of the record here. Yet while DOE has recognized the importance of the analysis contained in these materials by including them in many *other* LNG export dockets, DOE has inexplicably failed to include them here. Nor has DOE granted Sierra Club’s request that DOE confirm that, despite DOE’s decision to file these materials in some but not all individual application dockets, these materials will nonetheless automatically be considered part of the record in all present and future LNG export applications.

In an effort to lessen the burden imposed on DOE, the Applicant, and Sierra Club by such re-filing, in this filing, we have endeavored to include only those exhibits to our NERA study comments that were neither subsequently cited by DOE or the National Energy Technology Laboratory in the environmental review documents issued on May 29, 2014, nor included as exhibits to our comments on those May 2014 materials. In general, the omitted exhibits pertain to environmental impacts of LNG exports, whereas the included exhibits pertain to directly economic impacts or to monetization of environmental impacts.

Thus, the materials included in this filing are:

- EIA study on the Effect of Increased Natural Gas Exports on Domestic Energy Markets as requested by the Office of Fossil Energy
- NERA Economic Consulting's report on Macroeconomic Impacts of LNG Exports from the United States
- Sierra Club's comments on the NERA Study and exhibits 1-2, 4-24, 30, 43-47, and 76-77 thereto (exhibit files named "Ex. XXXX - ...").
- Sierra Club's reply comments on the NERA Study and all exhibits thereto (exhibits files named "R.Ex. XXXX - ...").

In a further effort to reduce the burdens on DOE and the Applicant, Sierra Club has sought to ensure that the electronic copies of these files conform to DOE's information technology requirements. Accordingly, where possible, we have simply downloaded these files, as processed by DOE, from another recent DOE docket, 13-153-LNG,¹ in which we also filed these materials. We were unable to re-file exhibits 20, 21, 23, 24, 43, 44, 45, and 46 (which DOE consolidated into a single file) in this way, because DOE's combined file exceeds DOE's own 10 megabyte file size cap for electronic submissions. Therefore, we re-submit these exhibits as separate files, although they are intended to be identical to exhibits that have previously been submitted to DOE on at least two separate occasions. Moreover, we agree to allow DOE to simply re-use the copies it has already approved should DOE encounter any problems with these re-submitted files. Sierra Club has requested that DOE merely incorporate the prior submission by reference, but absent DOE approval of that request, and in light of the unexplained DOE decision to include these materials in some but not all dockets, Sierra Club must, in an abundance of caution, re-file these materials.

These materials are in addition to, and are incorporated by reference in, the separate motion to intervene, comment, and protest Sierra Club will file regarding the above-captioned application.

Sincerely,



Nathan Matthews
Staff Attorney

¹ http://www.fossil.energy.gov/programs/gasregulation/authorizations/2013_applications/sc_11-153-LNG/sc_LNG_Export_Study/LNG_Export_Study_Exhibits_11-153-LNG.html

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Gasfin Development USA, LLC) FE DOCKET NO. 13-161-LNG
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VERIFICATION

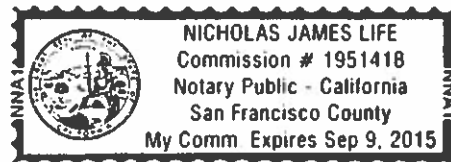
SAN FRANCISCO §
 §
CALIFORNIA §

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



Nathan Matthews
Associate Attorney
Sierra Club Environmental Law Program
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San Francisco, CA 94105
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Subscribed and sworn to before me this 29th day of September, 2014.


Notary Public

My commission expires: 09/09/2015

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CERTIFICATE OF SERVICE

I hereby certify that I caused the above documents to be served on the applicant and all others parties in this docket, in accordance with 10 C.F.R. § 590.017, on September 29, 2014.

Dated at San Francisco, CA, this 29th day of September, 2014.



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