

**From:** [Ramamurthy S](#)  
**To:** [LNGStudy](#)  
**Cc:** [Sriram Kommu](#); [Phani Sasikanth Mulakala](#)  
**Subject:** Comments on US LNG Exports Report  
**Date:** Wednesday, January 23, 2013 6:48:26 AM  
**Attachments:** [GMR EnergyIndia Comments - NERA Study on US LNG Exports.pdf](#)

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Dear Sir / Madam

This has reference to the notice of DOE no: 10 CFR Part 590 requesting public comments on LNG Export Study.

Please find attached the comments of GMR Energy Limited , Independent Power Producer based at India, on the NERA study "Macroeconomic Impacts of US LNG Exports".

Best Regards

S. Ramamurthy  
A V P - Hydrocarbons  
GMR Group, 9<sup>th</sup> Floor, D-Block, IBCKP,  
Bannerghatta Road, Bengaluru -560 029  
Email: [ramamurthy.s@gmrgroup.in](mailto:ramamurthy.s@gmrgroup.in) Website: [www.gmrgroup.in](http://www.gmrgroup.in)  
Off Ph: +91 80 40432703, Mobile No: +91 9741918613

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**Comments of GMR Energy Ltd, India on study of “Macroeconomic Impacts of LNG Exports from the USA” by NERA.**

We initially would like to thank DOE for giving us an opportunity for the stakeholders to review & comment on the studies conducted by NERA. After thorough review of the study conducted by NERA, we observed that they adopted the Global Natural Gas Model (GNGM) and Equilibrium Model of the US Economy to analyze the impacts of LNG Exports; we found it to be very logical.

NERA in its study assumed list of 63 Scenarios, that included every possible case under 3 major heads of US Reference, High Shale EUR & Low Shale EUR (Estimated Ultimate Recovery) covering all constraints related to level of exports, global market conditions and cost of producing natural gas.

**NERA Estimated GDP Increase in Year 2020 under different Scenarios**

<b>Scenario</b>	<b>Increase in GDP (US\$ Billion)</b>
US Reference	5-20
High Shale EUR	10-47
Low shale EUR	4.4

As per the Study, across all the scenarios U.S. has been projected to gain net economic benefits from allowing LNG exports. Moreover, for every one of the market scenarios examined, net economic benefits increased as the level of LNG exports increased.

The study if accepted will help in satisfying the growing global gas demand, particularly from the growing economy like India. US LNG exports will also help in keeping the global gas prices at reasonable levels.

**GMR Energy Ltd has following views on US LNG exports to India:**

- India being energy deficit country, LNG from US can very well compete with traditional supply sources like Qatar, Malaysia, and Indonesia etc., where LNG prices are linked to JCC.
- At east coast of India, lots of Power Plants are running at low capacities and some are even stranded due to non-availability of domestic gas.
- Indian Power Producers should be given an opportunity to sign LNG sale & purchase contracts with US Suppliers.
- To meet the consistent supply of LNG to Non FTA Countries like India, DOE should recommend the relevant US Ministry to grant “Free Trade Commodity” Status to LNG. Indian entities have already taken shale gas acreages at USA for E & P Operations. (Marcellus & Eagle Ford)
- Allowing LNG Exports would reduce the trade deficit and ensure higher revenues and additional Employment Opportunities in US.