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February 15, 2024

Debbie-Anne A. Reese, Acting Secretary
Federal Energy Regulatory Commission
888 First Street, N.W.
Room 1A, East
Washington, D.C. 20426

Re: Venture Global CP2 LNG, LLC and Venture Global CP Express, LLC
Docket Nos. CP22-21-000; CP22-22-000
Urgent Request for Commission Action

Dear Acting Secretary Reese:

Venture Global CP2 LNG, LLC and Venture Global CP Express, LLC (Applicants) submitted our application for authorization to construct, install, own, operate and maintain certain liquefied natural gas (LNG) facilities in Cameron Parish, Louisiana and certain pipeline facilities in Cameron and Calcasieu Parishes, Louisiana and Jasper and Newton Counties, Texas (Project) on December 2, 2021, after initiating the Commission's Pre-Filing process in January 2021. Commission action to approve the Project promptly is critically important.

The Project is unquestionably "consistent with the public interest." Throughout this approximately three-year long process, Applicants have provided all the information requested by Commission Staff and satisfied all the applicable requirements. The Project has consistently been strongly supported by the State of Louisiana and local interests. The Commission issued, on August 23, 2022, a public notice of revised schedule setting October 26, 2023 as the 90-day Federal Authorization Decision Deadline for the Project. Consistent with that schedule, Commission Staff concluded in the Final Environmental Impact Statement issued on July 28, 2023 that approval of the Project with the recommended mitigation measures would have only "less-than-significant" environmental impacts. Yet, the Commission still has not acted.

The Venture Global CP2 LNG Project has secured binding 20-year offtake agreements for 9.25 million metric tonnes per annum of LNG export capacity, with world-class counterparties JERA, SEFE Securing Energy for Europe, EnBW, ExxonMobil, Chevron, Inpex, China Gas and New Fortress Energy. In addition to hundreds of millions of dollars of investment to engineer and develop the Project in a manner that complies with all Commission environmental requirements and Staff data requests associated with the Commission's review to-date, we have also committed over two billion dollars to our key equipment suppliers and contractors for the Project, and we are ready to commence on-site construction

of this multi-billion dollar Project as soon as authorized by the Commission. The Project will provide major employment and financial benefits to the State of Louisiana and to the Nation, and support the energy security of key allies around the world, including Germany and Japan.

The Project is more advanced, commercially and financially, than any other proposed Gulf Coast LNG project that is pending Commission authorization. Its portfolio of customers consists of some of the most recognized and most creditworthy LNG offtakers in the world, a number of whom have urged the Commission to promptly approve the Project.¹ With very strong community support and having satisfied all safety and environmental criteria over a more than three-year long regulatory process, the Project now should be approved consistent with the Commission's past practice and with the public interest.

The Commission has recognized the Nation's interest in LNG exports for years and authorized numerous projects, with a variety of Commissioners of both political parties in many cases acting unanimously. In addition, the Commission has long understood the importance of approving pending LNG projects in a consistent and timely manner. As then-Chairman McIntyre observed in mid-2018:

There is widespread acknowledgement that the United States is poised to play an important role in serving worldwide natural gas demand. The U.S. is projected to be the third largest LNG exporter, and our exports continue to have widespread, bipartisan support, as exports benefit national security, our balance of trade and economic development at the state and local level. A recent ICF study concluded that over the next five to 10 years, LNG exports could create hundreds of thousands of jobs and add more than \$70 billion annually to the nation's GDP. Sufficient LNG export capacity is a necessary gateway to global gas markets, and so FERC's efficient processing of LNG facility applications will put the U.S. in a more competitive position globally.²

Several months later, on the same day that the Commission approved Venture Global's first LNG export project – Calcasieu Pass LNG – then-Chairman Chatterjee hailed the Commission's agreement on a path forward for consideration of LNG export terminals that are pending before the Commission, declaring:

This is a matter of truly strategic significance, and we as an agency are dedicated to doing our part in this historic American moment by conducting thorough, efficient and legally durable reviews of every LNG terminal application we receive.³

Finally, in written testimony before the Committee on Energy and Natural Resources of the United States Senate, then-Commissioner Phillips reiterated the views of the Chairmen who preceded

¹ See Comments of INPEX Corporation in Support of the CP2 LNG and CP Express Projects under CP22-21, et al.; Comments of JERA Co., Inc. in Support of the CP2 LNG Project under CP22-21, et al.; Comments of Securing Energy for Europe GmbH in Support of the CP2 LNG Project under CP22-21, et al; Comments of EnBW Energie Baden-Württemberg AG in support of the CP2 LNG Project under CP22-21, et al.

² Transcript of FERC Sept. 11, 2018 Podcast, "Chairman McIntyre discusses recent and upcoming activity at FERC," available at: <https://www.ferc.gov/sites/default/files/2020-05/09-11-transcript.pdf>.

³ FERC News Release, dated February 21, 2019, "FERC Reaches Breakthrough on LNG Certification," available at: <https://www.ferc.gov/news-events/news/ferc-reaches-breakthrough-lng-certifications>.

him:

The Commission's role in approving needed natural gas infrastructure is essential to every American. I am committed to ensuring our decision-making is timely . . .⁴

The Commission needs to follow through on this well-established course. Any further delay in the authorization of the Project could undermine the confidence of global customers and financial markets in the Commission process. We have made very significant financial commitments to our customers, vendors and suppliers, acting in reliance on the expectation that the Commission will act on a timely basis in accordance with its public pronouncements and its past practice. It is imperative that the Commission do so.

Accordingly, we respectfully urge the Commission to issue an order authorizing the Project no later than the Commission's next open meeting on March 21, 2024.

Respectfully submitted,

/s/ Michael Sabel

Michael Sabel
CEO, Executive Co-Chairman and Founder
Venture Global LNG

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cc: Chairman Willie L. Phillips
Commissioner Allison Clements
Commissioner Mark C. Christie
Terry Turpin, OEP Director
All parties

⁴ Testimony of Commissioner Willie L. Phillips, March 3, 2022, available at: <https://cms.ferc.gov/media/testimony-commissioner-willie-l-phillips-hearing-review-fercs-recent-guidance-natural-gas>.