The President
The White House
Washington, DC, 20500

Dear President Biden:

We are an international coalition of trade associations and leading public policy research organizations working together to advance common interests related to the beneficial role of natural gas in both energy security and the environment. We have serious concerns with the Administration decision to halt the public interest review process used by the Department of Energy (DOE) when considering applications to export liquefied natural gas (LNG) to non-free trade agreement (FTA) countries such as Japan, the UK, and members of the European Union.¹ Such action may restrict export of U.S. LNG to global markets, which would be detrimental to energy security while global gas markets remain in a fragile and unstable situation, risking a return of price volatility and further growth in emissions if consumers around the world switch to higher-polluting alternatives.

Even prior to this policy change, under your administration permits have taken an average of more than 330 days for approval—more than twice as long as during the two previous Administrations. Given the long-term energy security ramifications of Russia's invasion of Ukraine in both Europe and Asia, as well as growing demand for affordable, clean energy sources in the developing world, any effort that further delays export authorizations sends the wrong signals to U.S. allies and trading partners around the world.

Moreover, as you emphasized in a March 2022 speech committing additional LNG supplies to Europe, natural gas infrastructure expansions "will occur in a way that is consistent with...the net-zero climate goal that we're shooting for." This approach is consistent with Administration energy dialogues with other allies such as Japan³ and the UK.⁴ To this end, our industry has remained committed to ensuring natural gas projects support continued emissions reductions in furtherance of net zero ambitions. In particular, we are committed partners in the global effort to reduce methane emissions through efforts such as methane

¹ Under the Natural Gas Act, applications to export U.S. LNG are presumed to be in the public interest unless DOE determines otherwise.

² https://www.whitehouse.gov/briefing-room/speeches-remarks/2022/03/25/remarks-by-president-biden-andeuropean-commission-president-ursula-von-der-leven-in-joint-press-statement/

³ https://jp.usembassy.gov/japan-us-energy-security-dialogue-joint-statement

⁴ https://www.whitehouse.gov/briefing-room/statements-releases/2022/12/07/us-uk-energy-security-and-affordability-partnership

regulations in the EU, where there is now a very stringent and reinforced new regulation in effect, in the United States with the U.S. Department of Energy's International Working Group to Establish a Universal Approach to Measuring, Monitoring, Reporting, and Verifying Greenhouse Gas Emissions Across the Natural Gas Supply Chain, and with the CLEAN initiative from Japan.

Collectively, the commitment of the global industry to accelerate detection, documenting, and elimination of methane emissions through numerous voluntary initiatives and rapid technology deployment is gaining pace.

We remain eager to partner with governments around the world on the important technical and policy work necessary to advance international methane reduction initiatives. Our members are also aggressively pursuing innovation and investment in technologies to measure and reduce methane emissions throughout the value chain, while also working to accelerate development of promising low-carbon technologies, including biomethane and renewable natural gas (RNG), CCUS, hydrogen, ammonia, and e-methane. Collectively, these efforts will ensure that U.S. natural gas—already widely recognized to have enormous emissions reduction potential as a substitute to coal and higher-emitting natural gas producers such as Russia—can serve as an ever-cleaner component of the global energy mix.

As this important work proceeds, it is critical to understand that international demand for natural gas is likely to continue growing for decades. The IEA's April 2023 "Outlooks for Gas Markets and Investment" report forecasts that natural gas demand in Africa, the Middle East, and developing Asian markets will continue to grow through 2050, and that "an additional 240 bcm per year of LNG export capacity is needed by 2050 above what currently exists or is under construction." Other credible forecasts from BP and Japan's Institute for Energy Economics project higher global natural gas demand than IEA.

Meanwhile, despite heroic efforts since Russia's invasion of Ukraine, Europe's dependence on Russian natural gas remains unacceptably high, relying on nearly 50 bcm of LNG and pipeline imports in 2023. As Olivier Becht, France's minister delegate for foreign trade said in a recent statement on this issue, "What's certain is that in the current geopolitical environment, we're counting a lot on American gas,"."

In summary, with America now the world's largest LNG exporter, it is clear that U.S. natural gas must continue to play a fundamental role in supporting global energy security and contributing to an orderly energy transition and a sustainable, affordable, and reliable

⁵ Available at <u>Outlooks for gas markets and investment: a report for the G7 (windows.net)</u>. Projection based on IEA "STEPS," or Stated Policies, scenario.

energy future. We therefore strongly urge the Administration to reconsider any changes to the process for approving U.S. LNG exports to non-FTA countries, and expeditiously act on pending applications that need a decision.

Thank you for considering our views.

Sincerely,

American Exploration and Production Council
American Petroleum Institute
Asia Natural Gas & Energy Association
Center for Liquified Natural Gas
Energy Policy Research Foundation, Inc.
Eurogas
International Association of Oil & Gas Producers
International Gas Union
LNG Allies, The USLNG Association
U.S. Chamber of Commerce
Western States and Tribal Nations Natural Gas Initiative

Cc:

The Honorable Fumio Kishida, Prime Minister, Japan
The Honorable Ursula von der Leyen, President, European Union
The Honorable Anthony Blinken, U.S. Secretary of State
The Honorable Jennifer Granholm, U.S. Secretary of Energy
The Honorable Charles Michel, President, European Council
Jake Sullivan, Assistant to the President for National Security Affairs
Ali Zaidi, Assistant to the President and National Climate Advisor
John Podesta, Senior Advisor to the President for Clean Energy Innovation and
Implementation