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May 26, 2026

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

**Re: Venture Global CP2 LNG, LLC and Venture Global CP Express  
Applications for Authorization under Sections 3 and 7 of the Natural Gas Act  
For The CP2 LNG Expansion Project**

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Dear Ms. Reese:

Venture Global CP2 LNG, LLC (CP2 LNG) and Venture Global CP Express, LLC (CP Express) (together the Applicants) submit for filing this joint application (Application) pursuant to Sections 3 and 7 of the Natural Gas Act (NGA) and the rules and regulations of the Federal Energy Regulatory Commission (Commission) for: (i) authorization pursuant to NGA Section 3 to site, construct, own, operate and maintain an expansion of CP2 LNG's liquefied natural gas export terminal and associated facilities currently under construction on the east side of the Calcasieu Ship Channel, and the nearby Monkey Island, in Cameron Parish, Louisiana; and (ii) a certificate of public convenience and necessity pursuant to NGA Section 7(c) for CP Express to construct, own, operate and maintain an expansion created by the addition of new compression and related facilities on the CP Express Pipeline, which is also under construction and will extend from Jasper County in east Texas to the CP2 LNG Terminal.

Information Submitted

In accordance with 18 C.F.R. Sections 388.112 and 388.113, this Application consists of the following volumes:

- |            |                                                                             |
|------------|-----------------------------------------------------------------------------|
| Volume I   | Public (Application and Exhibits)                                           |
| Volume II  | Public (Environmental Resource Reports)                                     |
| Volume III | <i>Contains Privileged and Confidential Information – Do Not Release</i>    |
| Volume IV  | <i>Contains Critical Energy Infrastructure Information – Do Not Release</i> |

The materials contained in Volumes III and IV have been labeled in accordance with the Commission's regulations.

The Applicants request that, pursuant to Section 388.112 of the Commission's regulations, information included in Volume III be treated as privileged and confidential and withheld from public disclosure. This information is customarily treated as privileged and confidential, disclosure of which could result in commercial and competitive harm to the Applicants. Accordingly, the information is labelled "CUI//PRIV."

The Applicants request that, pursuant to Section 388.113 of the Commission's regulations, certain information included in Volume IV be treated as Critical Energy Infrastructure Information ("CEII") and withheld from public disclosure. This information is detailed design information, the disclosure of which could adversely impact safety and security. Accordingly, materials including such information are labeled "CUI//CEII."

The Applicants request that, pursuant to Sections 388.112 and 388.113 of the Commission's regulations, certain information in Volume IV be treated as both privileged and confidential and CEII and withheld from public disclosure. This information contains proprietary information used by the Applicants and their third-party consultants that is customarily treated as privileged and confidential, disclosure of which could result in commercial and competitive harm to the Applicants and their consultants. In addition, this information is detailed design information, the disclosure of which could adversely impact safety and security. Accordingly, materials including such information are labeled "CUI//CEII/PRIV."

#### Certification

I hereby certify that I have read and am familiar with the contents of the documents comprising the Application and that the contents of the Application are true and correct to the best of my knowledge and belief.

If you have any questions, please contact the undersigned representatives of the Applicants.

Respectfully submitted,

/s/ Fory Musser

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**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

|                                |   |                           |
|--------------------------------|---|---------------------------|
| Venture Global CP2 LNG, LLC    | ) | Docket Nos. CP26-____-000 |
| Venture Global CP Express, LLC | ) | and CP26-____-000         |

**APPLICATION FOR AUTHORIZATIONS UNDER  
SECTION 3 AND SECTION 7 OF THE NATURAL GAS ACT  
FOR THE CP2 LNG EXPANSION PROJECT**

Venture Global CP2 LNG, LLC (CP2 LNG) and Venture Global CP Express, LLC (CP Express) (together the Applicants) hereby file this joint application (Application) pursuant to Sections 3 and 7 of the Natural Gas Act (NGA) and the rules and regulations of the Federal Energy Regulatory Commission (Commission) for:

(i) authorization pursuant to NGA Section 3 to site, construct, own, operate and maintain an expansion of CP2 LNG’s liquefied natural gas (LNG) export terminal and associated facilities which are currently under construction on the east side of the Calcasieu Ship Channel, and the nearby Monkey Island, in Cameron Parish, Louisiana (the “CP2 LNG Terminal” or where clear, the “Terminal”); and (ii) a certificate of public convenience and necessity pursuant to NGA Section 7(c) for CP Express to construct, own, operate and maintain an expansion created by the addition of new compression and related facilities on the CP Express Pipeline, which is also under construction and will extend from Jasper County in east Texas to the CP2 LNG Terminal. The CP2 LNG Terminal Expansion and the CP Express Pipeline Expansion proposed in this Application are related projects that are collectively referred to herein as the “CP2 LNG Expansion Project” or simply the “Project.”

The Commission authorized the CP2 LNG Terminal and the CP Express Pipeline System after a protracted regulatory process in Docket Nos. CP22-21 and CP22-22.<sup>1</sup> The Applicants’ parent company, Venture Global LNG, Inc. (“Venture Global”) announced its final investment decision (“FID”) and the closing of project financing for the entirety of the currently-authorized project in two phases: a \$15.1 billion financing for the first phase of the CP2 LNG Terminal as well as the CP Express Pipeline announced in July 2025, and then an additional \$8.6 billion financing of the remainder of the CP2 LNG Terminal announced in March 2026. On-site construction of the CP2 LNG Terminal began in June 2025, and CP2 LNG and CP Express are both now proceeding with construction of all their currently authorized facilities so as to commence commercial operations of each phase thereof safely and as quickly as feasible. CP Express anticipates commencing initial natural gas transportation service by late 2026 while CP2 LNG is targeting the first export of LNG from the project in the second half of 2027 and the start of commercial operations of Phase 1 in late 2029 and of Phase 2 in mid-2030. Details regarding the status of the ongoing construction of the CP2 LNG Terminal and the CP Express Pipeline are available in the numerous filings and issuances in Docket Nos. CP22-21 and CP22-22, including in monthly status reports.

As currently authorized, the CP2 LNG Terminal includes (as further detailed in this Application below) eighteen liquefaction blocks; four full-containment, above-ground LNG storage tanks; two electric power generation plants; two LNG loading docks; and related facilities. The Terminal currently is authorized to produce and export

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<sup>1</sup> *Venture Global CP2 LNG, LLC; Venture Global CP Express, LLC*, 187 FERC ¶ 61,199 (2024) (“Authorization Order”), *reh’g*, 189 FERC ¶ 61,148 (2024) (“First Rehearing Order”), *reh’g*, 191 FERC ¶ 61,153 (2025) (“Supplemental Rehearing Order”), *reh’g and stay denied*, 192 FERC ¶ 61,155 (2025), *appeal pending sub nom. Dardar v. FERC*, Case No. 24-1291, *et al.* (D.C. Cir. filed Sept. 24, 2024).

a peak achievable capacity of 28 million metric tonnes per annum (MTPA) of LNG, with a pending application to increase the authorized output of the authorized facilities.<sup>2</sup> CP Express' authorized Pipeline System will extend approximately 85 miles from interconnections with existing pipelines in Jasper County, Texas, through Newton County, Texas, and Calcasieu and Cameron Parishes, Louisiana, with a single large compressor station ("Moss Lake Station") located near milepost 44.4 in Calcasieu Parish. The Pipeline System, as authorized, will transport on a firm basis up to 4,400,000 dekatherms per day (Dth/day) of natural gas from various pipeline interconnects to the CP2 LNG Terminal, and it will provide open access service under the Part 284 blanket certificate issued in the Authorization Order. All of the certificated firm transportation capacity on CP Express is contracted by CP2 LNG.

CP2 LNG now proposes to expand its Terminal to add six additional liquefaction blocks (just like those already approved), another gas-fired power plant (just like the two previously approved), a third marine berth within the already approved berthing area, and related facilities, as detailed below. The proposed Terminal Expansion facilities will be interconnected with the authorized CP2 LNG Terminal (including tie-ins to the authorized LNG storage tanks and the ship-loading marine facilities) and will be operated together with the authorized CP2 LNG Terminal as a single LNG export facility on a fully integrated basis. The proposed CP2 LNG Expansion facilities will increase the maximum peak liquefaction and export capacity of the CP2 LNG Terminal under optimal

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<sup>2</sup> On December 29, 2025, CP2 LNG filed in Docket No. CP26-55 an application requesting authorization to amend the Commission's authorization for the CP2 LNG Terminal to increase the authorized peak liquefaction capacity achievable under optimal conditions from 28.0 MTPA to 35.0 MTPA. That proposed increase in the authorized peak liquefaction capacity reflects refinements in the conditions and assumptions concerning the maximum potential output of the already authorized facilities; it does not involve the construction of any new facilities or modification of the already authorized facilities.

conditions by approximately 11.7 MTPA (equivalent to approximately 620.5 billion cubic feet per year (Bcf/yr)).

To provide for the transportation of additional feed gas to the CP2 LNG Terminal, CP Express proposes to add to its Pipeline System a new 227,000 horsepower (HP) compressor station to be located near Silsbee in Jasper County, Texas (“Silsbee Station”), slightly north of milepost 4.8 on the authorized Pipeline System. The new Silsbee Station will be connected to the Pipeline System through two new 48-inch-diameter natural gas pipeline laterals, each of which will be approximately 1,000 feet in length. This CP Express Expansion, with an estimated cost of approximately \$826 million, will add 1,900,000 Dth/day of incremental firm transportation capacity, with proposed incremental recourse rates. CP2 LNG has entered into a binding precedent agreement with CP Express for all of the incremental firm transportation capacity, following an open season in which no other potential customers expressed interest in the capacity. The binding precedent agreement is for a primary term of 25 years and contains negotiated rates as well as certain non-conforming terms consistent with the anchor shipper rights agreed to for the original CP Express capacity previously contracted by CP2 LNG.

The Applicants plan to start construction of the Expansion Project soon after the receipt of Commission authorization and other necessary regulatory permits and approvals, and target commencing construction promptly thereafter. To this end, the Applicants respectfully request the Commission issue an order authorizing the CP2 LNG Expansion Project as proposed by the end of 2026. Such expeditious review of the Project will be facilitated by the Commission’s extensive review of the very similar facilities at the CP2 LNG Terminal that have already been authorized, as the Applicants

explained in their request for waiver of the Pre-Filing process for this Project recently granted by the Director of the Office of Energy Projects in Docket No. PF26-8.<sup>3</sup> Streamlined processing of this Application also will be consistent with the goals of the Commission and the Presidential Administration of expediting the permitting of needed energy infrastructure and avoiding unduly burdensome and unnecessary process under the National Environmental Policy Act of 1969 (“NEPA”) while fully complying with all applicable legal requirements. Expedited processing of this Application is particularly warranted at this time given recent developments in the Middle East<sup>4</sup> and the consequent need for incremental LNG for U.S. allies and trade partners. Notably, President Trump recently proclaimed that “ensuring sufficient natural gas and liquefied natural gas (LNG) capacity is critical to sustaining United States defense operations and ensuring allied energy security [and that] [i]nadequate pipelines, processing, storage, or natural gas and LNG export capacity would leave the United States and its partners dangerously exposed in times of crisis.”<sup>5</sup>

While Applicants do not propose an explicit “phasing” of the Expansion Project, CP2 LNG plans to construct and commission the incremental Terminal facilities

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<sup>3</sup> The Applicants filed their request for waiver of the PF process in that docket on March 24, 2026. Accession No. 20260324-5193. The Director of OEP granted the PF waiver in a letter order issued on April 16, 2026. Accession No. 20260416-3048.

<sup>4</sup> See, e.g., U.S. Energy Information Administration, Today in Energy, “U.S. natural gas exports to grow nearly 30% by 2027 as LNG facilities ramp up,” (Apr. 16, 2026), *available at* <https://www.eia.gov/todayinenergy/detail.php?id=67484> (“recent disruptions to LNG exports through the Strait of Hormuz are increasing demand for LNG cargoes from outside the strait. The disruptions, mostly concentrated in Qatar, currently represent over 10 Bcf/d, or 20% of global supply”).

<sup>5</sup> “Presidential Determination Pursuant to Section 303 of the Defense Production Act of 1950, as Amended, on Natural Gas Transmission, Processing, Storage, and Liquefied Natural Gas Capacity,” Memorandum to the Secretary of Energy (Apr. 20, 2026), *available at* <https://www.whitehouse.gov/presidential-actions/2026/04/presidential-determination-pursuant-to-section-303-of-the-defense-production-act-of-1950-as-amended-on-natural-gas-transmission-processing-storage-and-liquefied-natural-gas-capacity/>.

sequentially, with requisite implementation authorizations from Commission Staff just as is being done now with the already-authorized Terminal facilities.<sup>6</sup> Provided that the Commission approves the project by the end of 2026 and construction of the CP2 LNG Expansion Project commences promptly thereafter, the Applicants are targeting first production of LNG from the Project by approximately the end of 2028. Construction of the Expansion Project is projected to take approximately 35-months, overlapping with a sequential commissioning process that will continue past construction. The Applicants anticipate placing all the Expansion Project facilities in-service, after completing commissioning, approximately four years after Commission authorization. That timeline, however, may be affected by the time required to reach FID once authorization is received, unforeseen issues that may arise during the construction and commissioning process, and a number of external factors. Accordingly, the Applicants respectfully request that any timing condition imposed on the Commission's authorization of the Project allow for six years from the date of the authorization order to place all of the Project facilities in-service.

In support of this Application, Applicants submit the following:

## **I. INTRODUCTION AND EXECUTIVE SUMMARY**

The Applicants are indirect, wholly-owned subsidiaries of Venture Global LNG, Inc. Venture Global is a long-term, low-cost provider of U.S.-produced LNG sourced from resource rich North American natural gas basins to world markets. Its business includes assets across the LNG supply chain, including LNG production, natural gas

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<sup>6</sup> The Applicants do not anticipate that the development, construction or operation of the Expansion Project will have any adverse impact on the timely construction and commissioning of the previously authorized CP2 LNG facilities.

transport, shipping, and regasification. Of particular relevance here, Venture Global is the developer, owner, and operator of LNG export projects using modular mid-scale plant designs with reliable, proven technology and innovative configuration to offer low cost, clean and reliable U.S. natural gas supplies to the world.

Venture Global's first project – the Venture Global Calcasieu Pass, LLC LNG export terminal located in Cameron Parish, Louisiana (“Calcasieu Pass”) and the associated TransCameron Pipeline, LLC pipeline – was authorized by the Commission in February 2019, in Docket Nos. CP15-550 and CP15-551.<sup>7</sup> Venture Global announced its positive FID for the Calcasieu Pass project in August 2019. The Calcasieu Pass terminal is now in full commercial operation and delivering LNG to major international customers pursuant to binding, long-term LNG Sales and Purchase Agreements (“SPAs”) that have contracted on a medium- or long-term basis for all of its 10 MTPA of nameplate capacity.

Venture Global's second project – the Venture Global Plaquemines LNG, LLC export project located in Plaquemines Parish, Louisiana (“Plaquemines LNG”) and the associated Venture Global Gator Express pipeline – was authorized by the Commission in September 2019, in Docket Nos. CP17-66 and CP17-67.<sup>8</sup> In May 2022, Venture Global announced its FID and the closing of the \$13.2 billion project financing for the initial phase of the Plaquemines LNG project and the affiliated Gator Express Pipeline, and the FID for the second phase with an additional \$7.8 billion project financing followed in March 2023. Plaquemines LNG has contracted to sell nearly all of its 20

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<sup>7</sup> *Venture Global Calcasieu Pass, LLC; TransCameron Pipeline, LLC*, 166 FERC ¶ 61,144 (2019).

<sup>8</sup> *Venture Global Plaquemines LNG, LLC; Venture Global Gator Express, LLC*, 168 FERC ¶ 61,204 (2019).

MTPA of nameplate capacity under long-term SPAs that will commence upon the completion of commissioning and the commencement of commercial operations of each phase of the project. Plaquemines LNG exported its first LNG commissioning cargo in December 2024, and it has continued to export commissioning cargos since that date, with the commercial operation of the first phase anticipated in the fourth quarter of this year and of the second phase in mid-2027. Plaquemines LNG and an affiliated company applied for authorization for a new LNG export terminal on a site immediately adjacent to the authorized Plaquemines LNG Terminal in November 2025, and that application is pending in Docket No. CP26-27.

Thus, the CP2 LNG and CP Express project authorized by the Commission in Docket Nos. CP22-21 and CP22-22 is Venture Global's third project to be successfully contracted and financed. Given extraordinary customer demand for incremental LNG beyond the output of its already authorized facilities and the significant commercial, environmental, and timing advantages of a brown-field Project expansion, as well as the current Administration's strong support of LNG exports,<sup>9</sup> Venture Global is now proposing the CP2 LNG Expansion Project. The Project will allow for needed incremental exports of abundant, clean-burning U.S. domestic natural gas supplies to

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<sup>9</sup> See Presidential Determination Pursuant To Defense Production Act, *supra* n.5. Long before that recent issuance, Executive Orders issued on the first day of the Administration recognized the benefits of LNG exports. The Energy Emergency Executive Order recognized that "the United States has the potential to use its unrealized energy resources domestically, and to sell to international allies and partners a reliable, diversified, and affordable supply of energy. This would create jobs and economic prosperity for Americans forgotten in the present economy, improve the United States' trade balance, help our country compete with hostile foreign powers, strengthen relations with allies and partners, and support international peace and security." Exec. Order No. 14,156, 90 Fed. Reg. 8433 (Jan. 20, 2025). That same day, the Unleashing Energy Executive Order directed the Department of Energy ("DOE") to "restart reviews of applications for approvals of liquified [sic] natural gas export projects as expeditiously as possible, consistent with applicable law." Exec. Order No. 14,154, 90 Fed. Reg. 8353 (Jan. 20, 2025). As explained further below, DOE has since expeditiously moved forward with "unleashing" LNG exports.

overseas markets, which are particularly in demand following recent developments in the Middle East adversely affecting LNG exports from that region.<sup>10</sup> Furthermore, as a “brownfield” expansion that will add incremental liquefaction at an existing LNG Terminal, and utilize it in conjunction with other infrastructure already authorized and under construction, CP2 LNG will benefit from construction efficiencies, while reducing costs, and minimizing environmental impacts compared to a greenfield project.

The total estimated construction cost for the currently authorized CP2 LNG project is in excess of \$30 billion, and the estimated added cost of the proposed CP2 LNG Expansion Project exceeds \$10 billion. The proposed Project is expected to require a peak workforce of up to 3,000 workers on site for approximately six months. Over an approximately three-year construction period, the construction workforce will typically average 1,600 workers for the Terminal Expansion and an additional average of 175 workers for the Pipeline System expansion, all with an estimated average annual salary of \$150,000. The Project is projected to result in the permanent hiring of approximately 150 workers. Construction and related activities also will create business opportunities for local suppliers and service providers, likely boosting supply chain revenues and supporting job growth in related industries. Furthermore, the Project is estimated to generate more than \$1.8 billion in net new local tax revenue from the start of construction through the estimated 20-year lifespan of the Project and to generate more than \$460 million in net new, direct tax revenue for the State of Louisiana during the same time. Overall, with addition of the Expansion Project proposed here, the CP2 LNG terminal

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<sup>10</sup> See *supra* nn.4 and 5.

will provide enormous economic and tax benefits to Cameron Parish and the State of Louisiana.

Natural gas delivered to the Terminal for the CP2 LNG Expansion Project will first be pre-treated in three new pretreatment systems to be added to the six such systems already authorized. The Project will also include two nitrogen removal units and three LNG expanders to remove excess nitrogen that may be present in the feed gas, like those approved to be added to the authorized facilities as a variance. After pre-treatment, the natural gas will be liquefied using six (6) new single mixed refrigerant (“SMR”) liquefaction blocks and ancillary facilities added in the Project, which will be essentially identical to the previously authorized 18 liquefaction blocks at the Terminal. Each liquefaction block includes two SMR liquefaction process units, separator vessels, a cold box, air cooled exchanges, a suction scrubber and a heavy hydrocarbon removal unit. In aggregate, the new liquefaction facilities added in the Project will be capable of producing at peak output under optimal conditions approximately 11.7 MTPA of LNG. Power for the liquefaction facilities, and the CP2 LNG Expansion Project overall, will be provided by a new natural gas-fired combined cycle power plant, which will include five gas turbines, five heat recovery steam generators, and two steam generators with total generating capacity of 720 megawatts (MW), all housed in a new building on the Terminal site. New boil-off gas compressors, and associated flash and gas relief systems, will be added to recover boil-off and flash gas to be used as fuel for the power generation.

After liquefaction, the LNG will be transferred via the aboveground piping to the four already authorized full-containment, LNG storage tanks (each with net usable capacity of approximately 200,000 cubic meters); no new LNG storage is proposed as

part of the CP2 LNG Expansion Project. From the LNG storage tanks, the LNG will be pumped through cryogenic transfer piping onto ocean-going LNG carriers at either the new marine berth included in the Expansion Project or one of the two marine berths that were previously authorized, all of which will be operated on an integrated basis. The new marine facilities included in the proposed Project will be constructed wholly within the approved footprint of the authorized marine facilities on the southwest shoreline of Monkey Island. Like the previously approved marine berths, the new berth to be added in this Project will be capable of receiving LNG carriers with a cargo carrying capacity ranging from 120,000 to 185,000 cubic meters (“m<sup>3</sup>”). All marine operations and vessels will comply with applicable U.S. Coast Guard (“USCG”) requirements and maritime laws, including the regulations for waterfront LNG facilities (33 C.F.R. Part 127 and Executive Order 10173).

CP2 LNG’s current Letter of Recommendation (“LOR”) from the USCG allows up to 400 carrier calls per year. Based on anticipated cargo density, loading temperatures and assuming LNG carriers have an average size of 165,000 m<sup>3</sup>, CP2 LNG expects approximately 550 annual LNG vessel port calls to export 35 MTPA of LNG (i.e., the peak capacity of CP2 LNG Phases 1 and 2, as proposed in Docket No. CP26-55) and approximately 735 annual port calls to export the facility’s 46.7 MTPA of peak LNG production capacity after construction of the CP2 LNG Expansion Project. Following discussions with the USCG, CP2 LNG submitted to the USCG a Preliminary Waterway Suitability Assessment (“WSA”) and an updated Letter of Intent (“LOI”) for the Project on December 16, 2025. CP2 LNG is currently in the process of updating its LOR with the USCG and will promptly file the updated LOR with FERC after it has been received.

CP2 LNG will submit, soon after this Application, an application with the DOE<sup>11</sup> for authorization to export the incremental volumes from the CP2 LNG Expansion Project to both (1) nations with which the United States has entered into a Free Trade Agreement requiring the national treatment of natural gas (“FTA nations”) and (2) other nations with which trade is not prohibited by U.S. law or policy (“non-FTA nations”).<sup>12</sup> The DOE reaffirmed last year, after the conclusion of a major study and its consideration of public comments on it, its long-standing conclusion that “exports of LNG from the United States are in the best interest of the American public.”<sup>13</sup> As Energy Secretary Wright explained in announcing that conclusion: “The facts are clear: expanding America’s LNG exports is good for Americans and good for the world....LNG supports our economy, strengthens our allies, and enhances national security.”<sup>14</sup> The DOE in the

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<sup>11</sup> The regulatory functions of NGA Section 3 were transferred to the Secretary of Energy in 1977 pursuant to section 301(b) of the Department of Energy Organization Act, Pub. L. No. 95-91, 42 U.S.C. § 7101 *et seq.* In reference to regulating the imports or exports of natural gas, the Secretary subsequently delegated to the Commission the authority to approve or disapprove the construction and operation of natural gas import and export facilities and the site at which such facilities shall be located. The most recent delegation is in DOE Delegation Order No. 00-044.00A, effective May 16, 2006. The Commission does not authorize importation or exportation of the commodity itself. *See, e.g., EarthReports, Inc. v. FERC*, 828 F.3d 949, 952-53 (D.C. Cir. 2016) (detailing how regulatory oversight for the export of LNG and supporting facilities is divided between the Commission and DOE). Rather, applications for authorization to import or export natural gas must be submitted to the DOE.

<sup>12</sup> CP2 LNG is currently authorized by DOE to export LNG equivalent to 1,446 Bcf per year (about 28 MTPA) to both FTA and non-FTA nations. *See* DOE Order No. 4812, Docket No. 21-131-LNG (Apr. 22, 2022) (FTA Authorization) and DOE Order No. 5265-A, Docket No. 21-131-LNG (Oct. 21, 2025), *reh’g denied* DOE Order No. 5265-B (March 26, 2026), *appeal pending sub nom. Sierra Club, et al. v. DOE*, D.C. Circuit Case No. 26-1036 (non-FTA Authorization). CP2 LNG’s application to increase the level of its authorized export volumes, corresponding with its uprate application filed with the Commission in Docket No. CP26-55, is pending before DOE in its Docket No. 21-131-LNG.

<sup>13</sup> *See* Press Release, DOE, “DOE FINALIZES 2024 LNG EXPORT STUDY, PAVING WAY FOR STRONGER AMERICAN ENERGY EXPORTS” (May 19, 2025), *available at* <https://www.energy.gov/articles/doe-finalizes-2024-lng-export-study-paving-way-stronger-american-energy-exports> (announcing DOE’s “Response to Comments for the 2024 LNG Export Study: Energy, Economic, and Environmental Assessment of U.S. LNG Exports,” *available at* [https://www.energy.gov/sites/default/files/2025-10/ENERGY%2C%20ECONOMIC%2C%20AND%20ENVIRONMENTAL%20ASSESSMENT%20OF%20U.S.%20LNG%20EXPORTS\\_RESPONSE%20TO%20COMMENTS\\_0.pdf](https://www.energy.gov/sites/default/files/2025-10/ENERGY%2C%20ECONOMIC%2C%20AND%20ENVIRONMENTAL%20ASSESSMENT%20OF%20U.S.%20LNG%20EXPORTS_RESPONSE%20TO%20COMMENTS_0.pdf)).

<sup>14</sup> Press Release, DOE (May 19, 2025), *supra* n.13.

current Administration has advanced the “unleashing” of U.S. LNG exports in numerous orders, including authorizations issued last year for both CP2 LNG itself and another Venture Global project.<sup>15</sup> As Secretary Wright explained upon the issuance of one of those recent orders:

Today’s authorization is another reminder that this administration is committed to expanding the supply of abundant, affordable, and secure American energy. The data over the past 10 years of U.S. LNG exports clearly shows that we can lead the world in energy production while lowering energy costs here at home.<sup>16</sup>

The Commission, like the DOE, should recognize the significant benefits of LNG exports, which include:

- Stimulating the local, state, regional, and national economies through direct job creation, and increased economic activity, thus increasing American gross domestic product;
- Helping to align the U.S. balance of trade and reduce long-standing international trade deficits with many other countries by selling U.S. LNG abroad;
- Advancing national security and energy security of the United States and its allies by providing increased access to reliable natural gas supplies from America;
- Expanding the liberalization of the global natural gas trade through fostering a liquid global LNG market; and
- Promoting stability in pricing for domestic natural gas.

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<sup>15</sup> See Press Release, DOE, *Energy Department Approves Final Export Authorization for Venture Global CP2 LNG* (Oct. 22, 2025), available at <https://www.energy.gov/articles/energy-department-approves-final-export-authorization-venture-global-cp2-lng>; Press Release, DOE, *DOE Issues Final Non-FTA LNG Export Authorization for Additional Exports From the Venture Global Calcasieu Pass Project* (Aug. 4, 2025), available at <https://www.energy.gov/articles/doe-issues-final-non-fta-lng-export-authorization-additional-exports-venture-global>.

<sup>16</sup> Press Release, DOE (Aug. 4, 2025), *supra* n.15.

A brownfield expansion of an authorized LNG Terminal, like the proposed Project here, also has meaningful environmental and operational benefits compared to greenfield construction. Those benefits include minimizing new land use and impacts and the efficiencies associated with sharing authorized infrastructure.

For these reasons, and those further detailed in Section VIII.A below, the Commission should readily conclude that the proposed expansion of the CP2 LNG Terminal is “not inconsistent with” the public interest, the standard for authorization under NGA Section 3(a); indeed, the expansion is manifestly in the public interest. Accordingly, the proposed expansion of the CP2 LNG Terminal should be authorized by the Commission.

For CP Express, the Commission has previously authorized the construction and operation of an 85.4 mile, 48-inch diameter pipeline extending from Jasper County in east Texas to the Terminal, an approximately 6-mile, 24-inch diameter lateral in Calcasieu Parish, and associated facilities including two 34,800 HP compressors at the Moss Lake Station, at a total cost estimated at the time of the Authorization Order as \$1.483 billion. In the Authorization Order, the Commission also granted CP Express a Part 284 blanket transportation certificate and approved (subject to certain conditions and modifications) its proposed FERC Gas Tariff and initial recourse rates. However, the Tariff and rates have not yet been made effective because construction of the pipeline is not yet complete.

The CP Express Pipeline System will provide access to a wide-range of existing and growing U.S. natural gas supplies through interconnections with numerous other pipelines. By adding the proposed 227,000 HP of compression at the new Silsbee Station

near the origin point of the pipeline in east Texas, CP Express will create 1,900,000 Dth/day of incremental firm transportation capacity, at an estimated cost of approximately \$826 million. CP Express requests Section 7(c) certificate authorization for its proposed expansion facilities as well as approval of the incremental recourse rates for it detailed in Section VII.D below. CP Express will provide the incremental firm service created by its expansion pursuant to its Tariff as previously approved by the Commission. No changes are proposed to the previously filed and approved *pro forma* Tariff other than to reflect the incremental rates for the CP2 LNG Expansion Project and revised fuel retainage (as described below).

The new CP Express transportation capacity included in the Project is necessary to transport natural gas from areas where ample natural gas supplies will be available to the CP2 LNG Terminal, making possible the incremental LNG exports that are in the public interest. As the Commission has repeatedly recognized (including when authorizing the original CP2 LNG and CP Express facilities), “it is not an uncommon model for entities developing LNG terminals to construct and operate, through an affiliate, an associated pipeline to provide transportation and ensure delivery of the natural gas which will serve as feedstock for the liquefaction process.”<sup>17</sup>

CP Express conducted an open season to offer incremental firm transportation capacity to other potential shippers but received no bids for capacity other than from CP2 LNG. The 25-year precedent agreement between CP Express and CP2 LNG for all of

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<sup>17</sup> See Authorization Order at P 38; *Driftwood Pipeline LLC*, 183 FERC ¶ 61,049, at P 24 (2023), *aff’d sub nom. Healthy Gulf v. FERC*, No. 21-1226 (D.C. Cir. Mar. 28, 2025). In each of these cases, the Commission cited as additional support for this approach: *Corpus Christi Liquefaction Stage III, LLC*, 169 FERC ¶ 61,135 (2019), *reh’g*, 181 FERC ¶ 61,033 (2022); *Rio Grande LNG, LLC*, 169 FERC ¶ 61,131 (2019), *reh’g*, 170 FERC ¶ 61,046 (2020); *Plaquemines LNG*, 168 FERC ¶ 61,204; *Port Arthur LNG, LLC*, 167 FERC ¶ 61,052 (2019); *Calcasieu Pass LNG*, 166 FERC ¶ 61,144 (2019)).

the incremental firm transportation capacity demonstrates the need for the pipeline expansion. The precedent agreement includes both negotiated rates and certain non-conforming terms provided to CP2 LNG as the Anchor Shipper making the pipeline expansion possible, which as described further below are consistent with a subset of the same rights provided when it contracted for CP Express' initial capacity.<sup>18</sup>

The proposed CP Express expansion satisfies the criteria set forth in the Commission's Certificate Policy Statement addressing new facilities as the proposal: (i) will provide increased natural gas firm transportation service; (ii) will result in no financial subsidization of the expansion project by existing customers; and (iii) will have no adverse consequences on existing customers, existing pipelines or landowners and communities.<sup>19</sup> There is no potential for subsidy by existing pipeline customers, as CP2 LNG is the only existing firm shipper on CP Express. There also will be no adverse impact on other existing pipelines or their customers, with the economic risk of the pipeline expansion facilities borne entirely by CP Express and its sole, affiliated customer CP2 LNG. No other existing pipeline provides transportation service to the CP2 LNG Terminal, which is needed for the Project, and the CP Express Pipeline Expansion is not intended to replace service on any other pipeline. Furthermore, CP Express has taken appropriate steps to minimize any adverse impacts on landowners and surrounding communities, and the benefits of its expansion outweigh any potential adverse economic impacts on the communities. For these reasons, the proposed expansion of CP Express

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<sup>18</sup> See Authorization Order at PP 58-63 (2024) and Section VII.B below.

<sup>19</sup> See *Certification of New Interstate Natural Gas Pipeline Facilities*, 88 FERC ¶ 61,227 (1999), *clarified*, 90 FERC ¶ 61,128 (2000) (hereinafter the "Certificate Policy Statement").

is in the public convenience and necessity and should be certificated by the Commission under NGA Section 7.

The Applicants respectfully request that the Commission process this Application expeditiously. The streamlining of required review under NEPA for needed natural gas infrastructure championed by the Administration as well as the Commission itself,<sup>20</sup> along with the Supreme Court’s recent *Seven County Infrastructure* decision,<sup>21</sup> should help avoid the sorts of delays that sometimes affected the Commission’s authorization of LNG projects in the past. Furthermore, all of the proposed CP2 LNG Expansion Project facilities at the CP2 LNG Terminal will be located within the storm surge walls being built to contain the already authorized facilities, other than the new marine berth which will be located within the approved turning basin. Thus, all of the affected areas for the Terminal Expansion have been previously evaluated in the Commission’s prior NEPA review in Docket No. CP22-21. Accordingly, the Commission may efficiently incorporate portions of its prior NEPA review of the facilities previously authorized for CP2 LNG and CP Express when reviewing the proposed Expansion Project.<sup>22</sup>

Furthermore, Venture Global has a proven ability, demonstrated at Calcasieu Pass and Plaquemines LNG as well as with the previously authorized CP2 LNG project, to

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<sup>20</sup> See, e.g., Press Release, White House, “CEQ Releases Guidance to Streamline NEPA Reviews” (Sept. 29, 2025), available at <https://www.whitehouse.gov/articles/2025/09/ceq-releases-guidance-to-streamline-nepa-reviews/>; Press Release, FERC, “FERC Revises NEPA Procedures to Make Permitting More Efficient” (June 30, 2025), available at <https://www.ferc.gov/news-events/news/ferc-revises-nepa-procedures-make-permitting-more-efficient>.

<sup>21</sup> See *Seven County Infrastructure Coal. v. Eagle County, Colo.*, 145 S.Ct. 1497 (2025).

<sup>22</sup> Notably, the Commission’s new NEPA implementation guidance promoting “Efficient Environmental Reviews” provides for Staff to incorporate by reference into its NEPA documents materials from a prior EIS or Environmental Assessment (“EA”) “when the effect will be to cut down on bulk without impeding staff’s review and public review of the action.” See Staff Guidance Manual on Implementation of NEPA (June 2025), issued on June 30, 2025, in conjunction with related Order No. 908 final rule, 191 FERC ¶ 61,237 (2025), at Section D.2, p. 14.

finance and construct LNG export facilities safely and expeditiously to begin supplying incremental American LNG that is needed in international markets. To do the same with the Expansion Project, the Applicants respectfully request that the Commission authorize this Project by the end of this calendar year to allow Applicants to start construction of the Expansion Project promptly thereafter. Construction of the CP Express Pipeline Expansion will be sequenced to align with the natural gas supply needs of its sole customer CP2 LNG, with initial transportation service made available (initially on an interruptible basis) prior to CP2 LNG's need for first commissioning gas. CP2 LNG's construction of the incremental liquefaction blocks will be sequenced so that initial quantities of LNG from the Expansion Project can be exported as soon as late 2028, with additional liquefaction brought on over time as it is commissioned with full operation by approximately the first half of 2031.

In support of their request, the Applicants state as follows:

## **II. APPLICANT INFORMATION**

The exact legal name of the first Applicant is Venture Global CP2 LNG, LLC. CP2 LNG is a Delaware limited liability company with its primary place of business located at 1401 McKinney Street, Suite 2600, Houston, TX 77010. CP2 LNG is primarily engaged in the business of developing the Export Terminal in Cameron Parish, Louisiana, authorized in the Order.

The exact legal name of the second Applicant is Venture Global CP Express, LLC. CP Express is a Delaware limited liability company with the same primary place of business as CP2 LNG. CP Express is primarily engaged in the development of the Pipeline System authorized by the Commission in Docket No. CP22-22. CP Express does not yet operate any interstate natural gas pipeline facilities, nor does it provide any services subject

to the Commission’s jurisdiction. However, upon completion of its authorized facilities and the commencement of the authorized services, CP Express will become a “natural gas company” within the meaning of Section 2(6) of the NGA, 15 USC § 717a(6), and subject to the Commission’s jurisdiction under the NGA.

Both CP2 LNG and CP Express are indirect, wholly owned subsidiaries of Venture Global LNG, Inc., which is a Delaware corporation with its principal place of business located at 1001 19th Street North, Suite 1500, Arlington, VA 22209. Venture Global is a long-term, low-cost provider of U.S.-produced LNG sourced from resource rich North American natural gas basins to world markets. In addition to the CP2 LNG Terminal, Venture Global is the developer, owner, and operator of the Calcasieu Pass LNG Terminal that is currently in operation and the Plaquemines LNG Terminal that is under construction and commissioning, which are located in Cameron Parish and Plaquemines Parish, Louisiana, respectively. Additional information regarding Venture Global and its leadership, personnel, and projects is available at the company’s website: <https://ventureglobal.com/>.

Venture Global’s parent company – Venture Global, Inc. (“VG”) – is a Delaware corporation with the same principal address as Venture Global, whose Class A common stock is publicly traded and listed on the New York Stock Exchange (NYSE:VG). As of the date of this Application, VG’s controlling shareholder, Venture Global Partners II, LLC (“VG Partners”), holds approximately 97.5% of the combined voting power of VG’s stock, and controls the management and policies of Venture Global and, thus, controls CP2 LNG. VG Partners is a Delaware LLC with the same principal address as Venture Global, and it

is 50 percent owned and controlled by each of the two founders of Venture Global, Michael A. Sabel and Robert B. Pender.

The officers and directors of CP2 LNG and CP Express are all U.S. citizens. Neither CP2 LNG nor CP Express is owned, in whole or in part, directly or indirectly, or subsidized directly or indirectly, by any foreign government or committed by contract to allow such ownership or subsidy by any foreign government.

### **III. COMMUNICATIONS**

The persons to whom correspondence and communications concerning this Application should be directed and upon whom service is to be made are as follows:

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CP2 LNG respectfully requests that the Commission waive Rule 203(b)(3), 18 C.F.R. § 385.203(b)(3), in order to allow each of the above representatives to be included on the official service list in these proceedings.

#### **IV. BACKGROUND REGARDING AUTHORIZED FACILITIES**

The CP2 LNG Export Terminal currently under construction is located on an approximately 737.3-acre site on the east side of the Calcasieu Ship Channel, in Cameron Parish, Louisiana. The existing project, as currently authorized by the Commission, has a nameplate liquefaction and export capacity of 20.0 MTPA and a peak achievable capacity of 28.0 MTPA under optimal operating conditions. As currently authorized, the CP2 LNG Terminal project facilities include:<sup>23</sup>

- One natural gas gate station;
- Six pretreatment facilities (each containing mercury removal, acid gas removal, hydrogen sulfide, and dehydration units);
- Eighteen liquefaction blocks, each with nameplate capacity of 1.1 MTPA, and each containing two single mixed refrigerant process units and ancillary support facilities;
- Four full-containment, above-ground LNG storage tanks, each with a net usable capacity of approximately 200,000 cubic meters;
- Two boil-off, flash, and gas relief systems;
- Four thermal oxidizers;
- Six Boil Off Gas compressors;
- Two LNG loading docks and related facilities, each designed to accommodate LNG carriers of 120,000 to 185,000 cubic meters, with accompanying turning basins

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<sup>23</sup> See Authorization Order at P 7.

within a shared recessed area along the southwest shoreline of Monkey Island on the east side of the Calcasieu Ship Channel;

- Two electric power generation plants with a combined nameplate capacity of 1,470 MW;
- Utilities, safety and security systems; and
- Other appurtenant facilities.

The CP2 LNG Terminal will receive natural gas via the CP Express Pipeline that was authorized by the Commission at the same time and is also currently under construction. CP Express is currently constructing its authorized new interstate natural gas pipeline system to transport up to 4,400,000 Dth/day of natural gas on a firm basis. Its pipeline system will extend approximately 85 miles from interconnections with existing pipelines in Jasper County, Texas, through Newton County, Texas, and Calcasieu and Cameron Parishes, Louisiana, and terminate at the CP2 LNG Terminal.<sup>24</sup>

The Commission authorized the CP2 LNG and CP Express Projects only after an exhaustive and protracted NEPA review process. The Applicants initiated the Pre-Filing process for the Projects in Docket No. PF21-1 in February 2021. After the completion of that process, the Applicants submitted their joint application for authorization in December 2021 in Docket Nos. CP22-21 and CP22-22.<sup>25</sup> The NEPA process that followed included a public comment process as well as 25 separate sets of Information Requests from Commission Staff, totaling more than 1,000 questions, leading up to the draft

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<sup>24</sup> See *id.* at P 10.

<sup>25</sup> See Accession Nos. 20211202-5104, -5105, -5106, -5107, -5108 and -5111.

Environmental Impact Statement (“EIS”) issued on January 19, 2023.<sup>26</sup> Another public comment process followed that issuance, along with another eight sets of Information Requests from Staff, leading up to issuance of the Final EIS on July 28, 2023. The Commission issued the Authorization Order about eleven months later, on June 27, 2024.

After initially denying rehearing by operation of law, the Commission in its November 2024 First Rehearing Order decided, in light of recent decisions by the D.C. Circuit on review of other projects, to prepare a supplemental EIS to evaluate further the Projects’ cumulative air impacts, and ordered that no authorizations to proceed with construction would be issued until the Commission issued a further merits order.<sup>27</sup> After completing that supplemental NEPA process, the Commission in its May 2025 Supplemental Rehearing Order held, again, that the cumulative air emissions associated with the Projects are not significant, that the Projects as authorized are environmentally acceptable actions, and accordingly the Commission finalized its authorization of the Projects under NGA Sections 3 and 7.<sup>28</sup>

DOE granted CP2 LNG long-term, multi-contract authority to export LNG to FTA nations in its Order No. 4812 on April 22, 2022. DOE conditionally authorized exports by CP2 LNG to non-FTA nations in its Order No. 5246 issued on March 19, 2025. In that conditional authorization, DOE explained that it had recently undertaken a study evaluating exports of domestically produced LNG, entitled 2024 LNG Export Study: Energy,

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<sup>26</sup> The Commission Staff originally scheduled the draft EIS to be issued in July 2022, but issued on July 6, 2022 a notice suspending its environmental review schedule and delaying the issuance of the draft EIS, on the basis that responses to outstanding information requests had not yet been submitted. *See* Accession No. 20220706-3046.

<sup>27</sup> *See* First Rehearing Order at PP 185-186.

<sup>28</sup> *See* Supplemental Rehearing Order at PP 23 and 92-93.

Economic, and Environmental Assessment of U.S. LNG Exports (“2024 LNG Export Study”), and that the public comment period for it remained open at the time. After completing its consideration of the 2024 LNG Export Study, DOE granted final authorization of the exports by CP2 LNG to non-FTA nations in its Order No. 5246-A issued on October 21, 2025. Those orders authorize CP2 LNG to export LNG to both FTA and non-FTA nations in a volume equivalent to 1,446 Bcf/yr (on a non-additive basis), which is approximately 28.0 MTPA of LNG.

Venture Global has had tremendous success with the commercial development of the CP2 LNG Project. CP2 LNG has entered into binding, long-term LNG SPAs for the 18.5 MTPA of its nameplate liquefaction capacity with major international companies, as well as contracts for all excess LNG produced above the nameplate capacity.<sup>29</sup>

On July 28, 2025, Venture Global announced its FID and the closing of the \$15.1 billion project financing for the initial phase of the CP2 LNG Project (which includes 14.4 MTPA of nameplate capacity) and the affiliated CP Express Pipeline.<sup>30</sup> The Commission Staff issued its first notices to proceed for CP2 LNG on May 30, 2025, authorizing mobilization and site preparation work as well as the start of its test pile program, and it has issued a series of additional notices to proceed for CP2 LNG in the subsequent months. On March 13, 2026, Venture Global announced the FID for the second phase of the CP2

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<sup>29</sup> All of these long-term SPAs have been filed by CP2 LNG with DOE in accordance with the requirements of its export authorizations and DOE policies, and they are available at: <https://www.energy.gov/hgeo/articles/venture-global-cp2-lng-llc-facility>.

<sup>30</sup> See Press Release, Venture Global LNG, *Venture Global Announces Final Investment Decision and Financial Close for Phase 1 of CP2 LNG* (July 28, 2025), available at <https://ventureglobal.com/2025/07/28/venture-global-announces-final-investment-decision-and-financial-close-for-phase-1-of-cp2-lng/>.

LNG Project, with the successful closing of an additional \$8.6 billion project financing.<sup>31</sup> As they receive the necessary authorizations, CP2 LNG and CP Express are both proceeding with construction of the entire project so as to commence commercial operations of each phase thereof safely and as quickly as feasible. Details regarding the status of the ongoing construction of the CP2 LNG Terminal and the CP Express Pipeline are available in the numerous filings and issuances in Docket Nos. CP22-21 and CP22-22, including in monthly status reports.

On December 29, 2025, CP2 LNG filed in Docket No. CP26-55 an application requesting authorization to amend the Commission's authorizations for the CP2 LNG Terminal to increase the authorized peak liquefaction capacity achievable under optimal conditions from 28.0 MTPA to 35.0 MTPA. That proposed increase in the authorized peak liquefaction capacity reflects refinements in the conditions and assumptions concerning the maximum potential output of the already authorized facilities; it does not involve the construction of any new facilities or modification of the already authorized facilities. CP2 LNG submitted a corresponding application to the DOE on February 20, 2026, in which it requested that its existing authorizations to export LNG to both free trade and non-free trade agreement countries be increased from 28.0 MTPA to 35.0 MTPA.<sup>32</sup>

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<sup>31</sup> See Press Release, Venture Global LNG, *Venture Global Announces Final Investment Decision and Financial Close for Phase 2 of CP2 LNG* (Mar. 13, 2026), available at <https://ventureglobal.com/2026/03/13/venture-global-announces-final-investment-decision-and-financial-close-for-phase-2-of-cp2-lng/>.

<sup>32</sup> Application of Venture Global CP2 LNG, LLC for Limited Amendment of Authorizations to Export Liquefied Natural Gas to Free Trade and Non-Free Trade Agreement Nations, available at [http://energy.gov/sites/default/files/202602/CP2 Uprate DOE Application %28022026%29.pdf](http://energy.gov/sites/default/files/202602/CP2%20Uprate%20DOE%20Application%28022026%29.pdf).

## **V. AUTHORIZATIONS REQUESTED FOR CP2 LNG EXPANSION PROJECT**

This Application is submitted in accordance with NGA Sections 3(a) and 7(c) and related Commission regulations, including its regulations implementing NEPA<sup>33</sup> set forth in 18 C.F.R. Part 380. CP2 LNG requests authorization, pursuant to Section 3(a) of the NGA<sup>34</sup> and Part 153 of the Commission's regulations,<sup>35</sup> to site, construct, own, operate and maintain the incremental expansion liquefaction and LNG export facilities proposed herein, to be located at the existing Terminal site in Cameron Parish, Louisiana. CP Express requests pursuant to Sections 7(c) of the NGA and Parts 157 and 284 of the Commission's regulations<sup>36</sup> a certificate of public convenience and necessity authorizing CP Express to construct, own, operate and maintain the proposed expansion of its Pipeline System proposed herein.

In addition, the Applicants seek any and all other necessary approvals and waivers necessary to construct and operate the CP2 LNG Expansion Project as proposed herein.

## **VI. DESCRIPTION OF PROPOSED CP2 LNG EXPANSION FACILITIES**

The proposed Project facilities are described below and maps showing the location of the facilities are provided in accordance with Commission regulations.<sup>37</sup> The CP2 LNG Expansion Project facilities will be situated on the approximately 737.3-acre site on the east side of the Calcasieu Ship Channel, in Cameron Parish, Louisiana, on which the already-authorized Terminal is currently being constructed. The Applicants, either directly

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<sup>33</sup> 42 U.S.C. § 4321, *et seq.*

<sup>34</sup> 15 U.S.C. § 717b(a).

<sup>35</sup> 18 C.F.R. Part 153.

<sup>36</sup> 18 C.F.R. Part 157, Subparts A and F; Part 284, Subpart G; and Part 380.

<sup>37</sup> *See* Terminal Exhibit G and Pipeline Exhibit F included in Application, Volume I.

or through an affiliate, have entered into agreements that grant the Applicants all of the necessary land to develop, construct, and operate the CP2 LNG Expansion Project. A full list of the Expansion Project facilities and appurtenances and associated design drawings is provided in Exhibit F, Resource Report 13. The design plans and detailed security systems are privileged and/or critical energy infrastructure information (CEII).

#### **A. TERMINAL FACILITIES**

A full list of the CP2 LNG Terminal Expansion facilities and appurtenances and associated design drawings is provided in Exhibit F/F-I, Resource Report 13. The design plans and detailed security systems are privileged and/or CEII and are therefore provided in Volumes III and IV of the Application. In summary, the CP2 LNG Terminal Expansion facilities will include the following components:

1. **Liquefaction Facilities.** The incremental liquefaction facilities to be added at the Terminal Site consist of six (6) new liquefaction blocks, which in aggregate, have a peak achievable capacity of up to approximately 11.7 MTPA. Just as with the already authorized facilities, each liquefaction block added in the CP2 LNG Expansion Project will include the following equipment: two single mixed refrigerant process units, which include a two-stage mixed refrigerant centrifugal compressor with electric motor driver, mixed refrigerant vapor and liquid separator vessels, a cold box, air cooled exchangers, a suction scrubber, and a heavy hydrocarbon removal system.

2. **Other Major Components.** In addition to the new liquefaction facilities, CP2 LNG proposes to construct the following additional facilities at the Terminal Site as part of the CP2 LNG Expansion Project:

### **Pretreatment Facilities**

Feed gas will be processed in the pretreatment facilities before being directed to the liquefaction blocks. The new pretreatment facilities will include three pretreatment systems that will be fed by common boost compressors and will each include: (i) a mercury removal unit; (ii) an amine gas-sweetening unit to remove CO<sub>2</sub> and hydrogen sulfide; and (iii) a hybrid molecular sieve dehydration system to remove water and heavy hydrocarbons. In addition, two nitrogen removal units and three LNG expanders will be added to remove excess nitrogen that may be present in the feed gas.<sup>38</sup>

### **Boil-off, Flash, and Gas Relief Systems**

Five electric-driven, boil-off gas compressors for recovering vapors generated from tank and pipeline heat leak, displaced gas from ship filling, and liquefaction flash gas; the recovered boil-off gases will be used as fuel gas by the Project's electric power generation facility. The relief system will also include associated piping for venting purge gas during plant startup and the venting or flaring of gas during emergency operational situations.

### **Power Generation and Electric Supply**

Power generation and electric supply for the Terminal Site Expansion will include a new 720-MW power plant, with five gas turbines, five heat recovery steam generators, and two steam generators housed in a new building.

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<sup>38</sup> While nitrogen removal units were not included in the original CP2 LNG Terminal facilities authorized in the Authorization Order, the Commission Staff approved the addition to the authorized CP2 LNG facilities of nitrogen removal units and LNG expander modules (just like those proposed here) as a variance in Docket No. CP22-21 issued on August 13, 2025. See Accession No. 20250813-3029.

### **Additional LNG Loading Dock**

The new Marine facilities will include one additional LNG loading dock (Berth 3) designed to accommodate LNG carriers ranging from 120,000 to 185,000 cubic meters of cargo capacity, which will utilize the approved turning basin for the south berth within a shared recessed area along the southwest shoreline of Monkey Island on the east side of the Calcasieu Ship Channel and will be constructed wholly within the approved footprint of the previously authorized marine facilities on the southwest shoreline of Monkey Island, which separates the Calcasieu Ship Channel and Calcasieu Pass. Dredging will be carried out as already approved and will be completed prior to construction of Berth 3. The new loading dock (like the two previously authorized) will include:

- One pipe and roadway trestle
- One loading platform
- One gangway
- Four marine loading arms
- Associated aids to navigation
- Four berthing dolphins, and
- Six mooring dolphins.

The new berth will involve in-water pile driving for the breasting and mooring dolphins, an LNG loading platform, and a common pipeway trestle. All the new waterfront facilities will be designed to meet USCG regulations at 33 C.F.R. Part 127 and all other applicable standards and codes.

### **Safety and Security Systems**

Emergency power will be provided by diesel generators. Control and security systems will be powered through an uninterruptible power supply system with battery back-up. The Project will be subject to USCG facility security regulations under the Marine Transportation Security Act (33 C.F.R. Part 105) and will have a facility security plan approved by the USCG. Just as with its previously authorized facilities, CP2 LNG will implement all necessary security measures required under those regulations, including security fencing, lighting, access control, and a closed-circuit television system.

#### **Communications and Water Systems**

- The CP2 LNG Expansion Project will utilize the communication system previously authorized for the Terminal.
- The Terminal Site sources water from groundwater wells for process and potable water requirements. No additional water supply is needed for the Terminal Site Expansion facilities. The Terminal Site Expansion liquefaction blocks, as well as electric generation facilities, will be air cooled, significantly reducing the Project's operational process water requirements. The approved fire system water tanks will require no additional storage related to the CP2 LNG Expansion Project.
- Stormwater will be discharged to receiving waters near the Terminal Site, as approved. The outfalls will be regulated by the Louisiana Department of Environmental Quality under the Louisiana Pollutant Discharge Elimination System program.

### **Power Plant Support Structure**

Just one new building will be added to the Terminal, to house the CP2 LNG Expansion Project power plant, along with minor modifications to other already authorized buildings on the Terminal Site.

### **B. PIPELINE SYSTEM FACILITIES**

Just as for the previously authorized operations, for the CP2 LNG Expansion Project, CP Express will transport feed gas to the CP2 LNG Terminal from interconnection points with various interstate and intrastate natural gas pipelines along the mainline. As already authorized, the CP Express Pipeline System will be located in Jasper and Newton Counties, Texas, and Calcasieu and Cameron Parishes, Louisiana.

The proposed CP Express Pipeline expansion includes the new Silsbee Compressor Station and two short, 48-inch-diameter gas pipelines designed to transport natural gas to and from that compressor station. The 227,000 HP Silsbee Compressor Station will include the construction of five 45,400 HP natural gas-fired compressor units and will be located north of MP 0.0 of the approved pipeline system near Silsbee in Jasper County, TX. The Silsbee Compressor Station will connect to the CP Express pipeline through two new 48-inch-diameter natural gas pipelines, each of which will be approximately 1,000 feet in length. The Silsbee Compressor Station is designed to receive incoming gas from CP Express Pipeline at approximately 1,440 pounds per square inch gauge (psig) and discharge back into the Pipeline System at 2,100 psig. The compression equipment will be provided with noise and emissions control features to comply with regulatory requirements. The site will be fenced to provide security and safety. Electrical utility power for the compressor station will be provided by Jasper-Newton Electric Co-Op via an interconnect with an existing transmission line.

The addition of the new compression at the Silsbee Compressor Station will allow CP Express to transport an incremental 1,900,000 Dth/day of firm transportation capacity to the CP2 LNG Terminal, while maintaining the existing planned delivery pressure of approximately 1,230 psig at the inlet to the Terminal gas gate station. The maximum allowable operating pressure (MAOP) for the CP Express Pipeline will be 2,100 psig south of that Compressor Station. The Silsbee Compressor Station and the related new CP Express facilities, just like those already authorized, will be constructed, operated and maintained in accordance with the U.S. Department of Transportation's Pipeline and Hazardous Materials Safety Administration ("PHMSA") safety regulations set forth in 49 C.F.R. Part 192. The total cost of the new CP Express pipeline facilities included in the Project is estimated to be approximately \$826 million.

Specific descriptions and locations of the proposed Project facilities, as well as the construction and installation activities, are set forth in Exhibit F/F-I, Resource Report 1 (General Project Description), in Volume II of this Application. In addition, flow diagrams demonstrating the expected flows on the Pipeline System, with the assumed deliveries and pressures from each upstream pipeline, and associated hydraulic flow modeling assumptions, are attached in Exhibits G/G-I and G-II.

### **C. FACILITY SAFETY AND SECURITY**

All the facilities proposed as part of the Expansion Project have been designed to be safe and efficient and to operate with minimal maintenance, breakage or impact on the environment. All the proposed facilities will be constructed and operated in accordance with governing federal, state and local regulations. Exhibit F, Resource Reports 11 and 13 describe in detail the safety measures and controls for the Project. The CP2 LNG Terminal has existing operating protocols and procedures for the safe and reliable production of LNG, as well as existing emergency response plans and procedures. The Expansion Project facilities will be incorporated into those existing plans and procedures.

The Applicants are actively consulting with the PHMSA and the USCG regarding the safety and security of the Expansion Project. The Project will meet the applicable requirements of the USCG regulations set forth in 33 CFR Part 127 and applicable PHMSA requirements set forth in 49 CFR Part 193, and all other applicable standards and codes for safety and fire protection applicable to LNG terminals, including the relevant editions of National Fire Protection Standard for the Production, Storage, and Handling of LNG (NFPA 59A) and National Electric Code Standard 70.<sup>39</sup> These requirements and standards include the following technical safety measures:

- angular/linear displacement meters and alarms (jetty arms);
- quick connect/disconnect couplings (jetty arms);

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<sup>39</sup> Applicants recognize that the final determination of whether the Project complies with federal regulations of 49 CFR Part 193 is made by PHMSA, to be reflected in a Letter of Determination in accordance with the Memorandum of Understanding between the Commission and PHMSA dated Aug. 31, 2018. CP2 LNG will develop credible spill scenarios and complete exclusion zone modeling in accordance with the Part 193 regulations and with National Fire Protection Association Standard 59A (“NFPA 59A”), and will submit that modeling to PHMSA for its review. Given the nature and location of the CP2 LNG Expansion Project facilities, and in particular the lack of any new LNG storage tanks, CP2 LNG does not expect that the modeling for its Expansion to extend the thermal exclusion zones or vapor dispersion exclusion zones currently established for the CP2 LNG Terminal.

- emergency system ship-to-shore interface point (jetty arms);
- impoundment basins for LNG spillages;
- fire, gas, and LNG spill detectors;
- emergency shutdown systems;
- firefighting systems (water deluge, foam generator, and dry powder);
- hazardous area classifications;
- depressurization and flare systems; and
- terminal security devices.

The Applicants also will comply with all applicable USCG facility security regulations under the Marine Transportation Security Act (33 CFR Part 105) and will have a facility security plan approved by the USCG. The CP2 LNG Expansion Project facilities, just like the already authorized CP2 LNG facilities, will meet the necessary security measures required under those regulations, including security fencing, lighting, access control, and a CCTV system.

CP Express will design, construct, and operate its portion of the CP2 LNG Expansion Project, just like its already authorized facilities, in compliance with 49 C.F.R. Part 192, Transportation of Natural and Other Gas by Pipeline: Minimum Federal Safety Standards, this Commission's Siting and Maintenance Requirements set forth in 18 C.F.R. Section 380.15, and the applicable Louisiana and Texas pipeline safety requirements.

## **VII. CP EXPRESS MATTERS**

### **A. MARKET NEED FOR PIPELINE SYSTEM EXPANSION**

CP Express conducted a binding open season for the proposed incremental firm transportation services designed to deliver domestic U.S. natural gas supplies to the Terminal. The open season announcement was prominently published in a widely-circulated industry publication and was also made available on Venture Global's website. The open season provided all potential customers with the opportunity to qualify as an Anchor Shipper by contracting for the large, long-term financial commitments needed to ensure the viability of the Pipeline System. CP2 LNG was the only entity that bid in the open season or expressed interest in obtaining transportation capacity on the proposed expansion of CP Express. CP2 LNG executed a binding precedent agreement with CP Express for firm transportation service of 1,900,000 Dt/d for a primary term of twenty-five (25) years from CP Express' planned interconnection with the Blackfin Pipeline, LLC intrastate system in Jasper County, Texas, to the CP2 LNG Terminal -- which qualified it as an Anchor Shipper consistent with the open season terms. Thus, the proposed CP Express Pipeline Expansion is fully-subscribed.

The precedent agreement requires CP2 LNG to enter into a firm transportation service agreement with CP Express following the satisfaction or waiver of certain customary conditions precedent. The proposed commencement date for the firm transportation service is intended to coincide with the commercial operation of CP2 LNG's expansion. CP Express provides in Exhibit I an executed copy of its binding precedent agreement with CP2 LNG as evidence of the market demand for its proposed expansion. This document is confidential and is thus marked as "Contains Privileged information – Do Not Release" and is provided in Volume III of the Application.

CP2 LNG needs the incremental transportation created by the expansion of CP Express to transport additional feed gas for liquefaction at its own proposed expansion of the Terminal: a new, domestic use of natural gas. Absent the construction of the CP Express Pipeline Expansion, and the contracting for the incremental firm transportation by CP2 LNG, sufficient natural gas could not be delivered to the Terminal for the liquefaction and export proposed in the Project. The need to transport gas for LNG exports further supports the need for the CP Express Pipeline Expansion given the public interest in LNG exports. Of course, the particular natural gas supplies that will be transported by CP Express to the Terminal for the Project cannot be known with certainty at this time and will change over the life of the Project, and, given its multiple interconnecting pipelines, the Project by design is not dependent upon any particular natural gas supply.

The Commission has explained that “it is not an uncommon model for entities developing LNG terminals to construct and operate, through an affiliate, an associated pipeline to provide transportation and ensure delivery of the natural gas which will serve as feedstock for the liquefaction process.”<sup>40</sup> Notably, LNG terminals like CP2 LNG do not have any captive customers to whom they can pass the costs associated with their pipeline transportation contracts.<sup>41</sup> More generally, the Commission, as well as reviewing courts, have long-recognized that long-term precedent agreements are significant evidence of demand, and thus of need, to support the approval of natural gas pipeline construction

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<sup>40</sup> See Authorization Order at P 48 (2024) and the additional cases cited at *supra* n.17.

<sup>41</sup> See Authorization Order at P 50 (2024); *Driftwood Pipeline LLC*, 183 FERC ¶ 61,049, at P 24 (2023). As explained in those cases, this fact about LNG terminals, along with the lack of any evidence of self-dealing or anticompetitive behavior, helps distinguish such contracts from the specific facts and circumstances presented when the D.C. Circuit decision reversing the Commission’s reliance on a single affiliate precedent agreement to demonstrate need in *Env’tl. Def. Fund v. FERC*, 2 F.4th 953 (D.C. Cir. 2021). See also *Spire STL Pipeline LLC*, 181 FERC ¶ 61,232 at P 25 (2022) (Order on Remand).

projects.<sup>42</sup> Furthermore, the Commission has repeatedly explained that affiliation between a pipeline and the shipper contracting for supply does not alter its analysis.<sup>43</sup> The Commission also has repeatedly recognized that precedent agreements transporting natural gas that is ultimately destined for consumption in foreign commerce after liquefaction are evidence of need under NGA section 7.<sup>44</sup>

## **B. NEGOTIATED RATES AND ANCHOR SHIPPER RIGHTS**

CP Express and CP2 LNG have agreed to negotiated rates for Rate Schedule FT service, as allowed pursuant to CP Express' approved *pro forma* Tariff and general Commission policies.<sup>45</sup> The open season for the Pipeline System made these negotiated

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<sup>42</sup> See, e.g., Certificate Policy Statement, 88 FERC ¶ 61,227 at 61,748 (precedent agreements “constitute significant evidence of demand for the project”); *Del. Riverkeeper Network v. FERC*, 45 F.4th 104, 114 (D.C. Cir. 2022) (“Precedent agreements are important, and sometimes sufficient, evidence of market need for a pipeline project.”); *Minisink Residents for Env'tl. Pres. & Safety v. FERC*, 762 F.3d 97, 110-111 (D.C. Cir. 2014) (“nothing in the [Certificate Policy Statement] or in any precedent construing it to suggest that it requires, rather than permits, the Commission to assess a project’s benefits by looking beyond the market need reflected by the applicant’s existing contracts with shippers. To the contrary, the [Certificate Policy Statement] specifically recognizes that such agreements ‘always will be important evidence of demand for a project.’”); *Myersville Citizens for a Rural Cmty., Inc., v. FERC*, 183 F.3d 1301, 1311 (D.C. Cir. 2015) (rejecting argument that precedent agreements are inadequate to demonstrate market need and explaining that it is Commission policy to not look behind precedent or service agreements to make judgments about the needs of individual shippers); *Twp. of Bordentown v. FERC*, 903 F.3d 234, 263 (3d Cir. 2018) (“As numerous courts have reiterated, FERC need not ‘look[] beyond the market need reflected by the applicant’s existing contracts with shippers.’”); *Appalachian Voices v. FERC*, No. 17-1271, 2019 WL 847199 at \*1 (D.C. Cir. Feb. 19, 2019) (unpublished) (precedent agreements are substantial evidence of market need); *Sierra Club v. FERC*, 867 F.3d 1357, 1379 (D.C. Cir. 2017) (affirming Commission reliance on preconstruction contracts for 93 percent of project capacity to demonstrate market need); *Transcon. Gas Pipe Line Co.*, 185 FERC ¶ 61,133, at P 14 (2023) (collecting cases) (“A precedent agreement for 100% of the project’s capacity is significant evidence of the need for the proposed project.”).

<sup>43</sup> See, e.g., Authorization Order at P 48 (2024); *Rio Grande LNG, LLC*, 170 FERC ¶ 61,046 at P 20 (2020); *Mountain Valley Pipeline, LLC*, 161 FERC ¶ 61,043, at P 45, *order on reh’g*, 163 FERC ¶ 61,197, at P 90, *aff’d*, *Appalachian Voices v. FERC*, No. 17-1271, 2019 WL 847199, at \*3 (D.C. Cir. 2019); *Atlantic Coast Pipeline, LLC*, 161 FERC ¶ 61,042 at P 59 (2018); *Greenbrier Pipeline Co.*, 101 FERC ¶ 61,122, at P 59 (2002); *Millennium Pipeline Co. L.P.*, 100 FERC ¶ 61,277, at P 57 (2002); *Tex. E. Transmission Corp.*, 84 FERC ¶ 61,044 (1998).

<sup>44</sup> See, e.g., Authorization Order at P 29, *discussing City of Oberlin, Ohio v. FERC*, 39 F.4th 719 at 725-26 (D.C. Cir. 2022); *Driftwood Pipeline LLC*, 183 FERC ¶ 61,049 at P 29 (2023); *Rio Grande LNG, LLC*, 170 FERC ¶ 61,046 at PP 16-19 (2020).

<sup>45</sup> See generally *Alt. to Traditional Cost-of-Service Ratemaking for Nat. Gas Pipelines; Regul. of Negotiated Transp. Servs. of Nat. Gas Pipelines*, 74 FERC ¶ 61,076, *clarification granted*, 74 FERC ¶

rates and certain other contractual rights (explained below) available to all qualifying Anchor Shippers. The Commission has consistently recognized that non-conforming provisions for major, initial shippers may be necessary to reflect the unique circumstances involved with the construction of new infrastructure and to provide the needed financial security to ensure the viability of a project.<sup>46</sup>

CP Express granted certain contractual rights to CP2 LNG as its Anchor Shipper that may be viewed as a material deviation from the Rate Schedule FT Form of Service Agreement contained in CP Express's *pro forma* Tariff. These contractual rights are a sub-set of very similar anchor shipper rights that were provided to CP2 LNG as the Anchor Shipper when it contracted for CP Express' initial capacity.<sup>47</sup> In particular, the precedent agreement between CP Express and CP2 LNG provides CP2 LNG with the following Anchor Shipper rights:<sup>48</sup>

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61,194, *order on reh'g and clarification*, 75 FERC ¶ 61,024, *reh'g denied*, 75 FERC ¶ 61,066, *reh'g dismissed*, 75 FERC ¶ 61,291 (1996), *petition denied sub nom. Burlington Res. Oil & Gas Co. v. FERC*, 172 F.3d 918 (D.C. Cir. 1998) (Alternative Rate Policy Statement); *Nat. Gas Pipelines Negotiated Rate Policies & Practices; Modification of Negotiated Rate Pol'y*, 104 FERC ¶ 61,134 (2003) (Negotiated Rate Policy Statement), *order on reh'g and clarification*, 114 FERC ¶ 61,042, *reh'g dismissed and clarification denied*, 114 FERC ¶ 61,304 (2006).

<sup>46</sup> E.g., Authorization Order at P 61; *Atlantic Coast Pipeline, LLC*, 161 FERC ¶ 61,042, at P 59 (2018); *Gulf South Pipeline Co., LP*, 149 FERC ¶ 61,174, at P 104 (2014); *Sierrita Gas Pipeline, LLC*, 147 FERC ¶ 61,192, at P 104 (2014); *Transcontinental Gas Pipe Line Corp., LLC*, 145 FERC ¶ 61,152, at P 34 (2013); *Tennessee Gas Pipeline Co.*, 144 FERC ¶ 61,219, at P 32 (2013).

<sup>47</sup> See Authorization Order at PP 58-63. The original PA provided CP2 LNG the following additional rights that are not included in the PA for the CP Expansion Project: (1) a one-time right to delay Phase II of the original CP Express facilities in certain conditions; (2) a right to reduce the contract quantity during an extension term; and (3) primary receipt point rights that exceeded the maximum daily transportation quantity. The Anchor Shipper rights here are also similar to certain rights agreed upon in connection with each of Venture Global's two prior LNG projects by the associated pipelines TransCameron and Gator Express, which also were approved by the Commission. See *Venture Global Calcasieu Pass, LLC, et al.*, 166 FERC ¶ 61,144, at P 34-38 (2019); *Venture Global Plaquemines LNG, LLC, et al.*, 168 FERC ¶ 61,204, at P 62-65.

<sup>48</sup> As an Anchor Shipper, CP2 LNG was also given the contractual right to terminate the executed Precedent Agreement and the service agreement, as applicable, if a FERC order related to the incremental firm capacity, which has become final and is no longer subject to further rehearing, includes a material change to any of its Anchor Shipper rights. This right, however, obviously will no longer have any

- (1) The right to extend the initial 25-year primary term for up to four successive 5-year terms, at its election, by providing notice to CP Express no later than two (2) years prior to the end of the primary term;
- (2) A contractual Right of First Refusal to retain the capacity at the end of the term, consistent with applicable Tariff provisions; and
- (3) Project-specific credit provisions to support the significant financial investment associated with development of the Pipeline System that will remain in place for the duration of the firm service agreement.

CP Express respectfully requests that the Commission approve the above-listed contractual provisions in its Order on this Application to avoid any need to revisit any issues raised by the agreements after CP Express incorporates these Anchor Shipper rights into its executed service agreement with CP2 LNG. The Commission's policy is to accept non-conforming provisions for major, initial customers if they will not present any risk of undue discrimination, affect the operational conditions of providing service, or result in a customer receiving a different quality of service from that available to other customers.<sup>49</sup> The non-standard contractual provisions agreed upon by the parties are consistent with these policies.

Moreover, the Commission has repeatedly upheld special contract extension rights for major shippers committing to capacity in new infrastructure projects.<sup>50</sup> And

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relevance once the service agreement becomes effective, and so it does not present any issue of non-conforming terms.

<sup>49</sup> E.g., Authorization Order at P 61; *Venture Global Calcasieu Pass, LLC, et al.*, 166 FERC ¶ 61,144, at P 37; *Venture Global Plaquemines LNG, LLC, et al.*, 168 FERC ¶ 61,204, at P 64; and the additional cases cited at *supra* n.46.

<sup>50</sup> E.g., *Tennessee Gas Pipeline Co.*, 139 FERC ¶ 61,161, at P 31 and 37 (2012); *Texas Eastern Transmission, LP*, 139 FERC ¶ 61,138, at P 55-56 (2012).

the Commission has frequently recognized that it is appropriate for different creditworthiness standards to apply to project Anchor Shippers given the need for the project sponsor to recover its costs in the event that the foundation shipper defaults.<sup>51</sup>

Furthermore, these non-standard contract provisions are necessary in the commercial context of LNG project development and are an integral part of the arrangements under which CP2 LNG agreed to provide contractual support for the expansion of CP Express' Pipeline System. CP2 LNG's twenty-five (25) year commitment to subscribe for all of CP Express' incremental firm transportation capacity demonstrates it is not similarly situated to any other shipper. Under the Commission's negotiated rate and discount policies, project sponsors may rely on a variety of rate incentives to induce potential customers to commit to a project, and may distinguish among various shippers according to factors such as the size of the commitment, the timing of the commitment, the length of the contract, and elasticities of demand.<sup>52</sup> Neither the rates nor non-conforming provisions set forth in the precedent agreement with CP2 LNG affect the terms or quality of service on the CP Express Pipeline System. Therefore, none of these contract provisions create the risk of undue discrimination under

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<sup>51</sup> See e.g., *Ruby Pipeline, LLC*, 128 FERC 61,224, at P 75-81 (2009); *Midwestern Gas Transmission, Co.*, 114 FERC ¶ 61,257, at P 47-50 (2006).

<sup>52</sup> See *Revisions to the Blanket Certificate Regulations and Clarification Regarding Rates*, Order No. 686, 117 FERC ¶ 61,074 (2006), *order on reh'g and clarification*, Order No. 686-A, 119 FERC ¶ 61,303 (2007), *order on reh'g*, Order No. 686-B, 120 FERC ¶ 61,249 (2007); *Gulf Crossing Pipeline Co. LLC*, 123 FERC ¶ 61,100, at P 41; see also *Pipeline Service Obligations and Revisions to Regulations Governing Self-Implementing Transportation Under Part 284 of the Commissions Regulations and Regulation of Natural Gas Pipelines After Partial Wellhead Decontrol*, Order No. 636, 59 FERC ¶ 61,030 (1992), *reh'g*, Order No. 636-A, 60 FERC ¶ 61,102 (1992), *reh'g*, Order No. 636-B, 61 FERC ¶ 61,272 (1992), *aff'd in relevant part*, *United Distribution Cos. v. FERC*, 88 F.3d 1105 (D.C. Cir. 1996), *on remand*, Order No. 636-C, 78 FERC ¶ 61,186 (1997), *reh'g denied*, Order No. 636-D, 83 FERC ¶ 61,210 (1998); *Regulation of Short-Term Natural Gas Transportation Services, and Regulation of Interstate Natural Gas Transportation Services*, Order No. 637, 90 FERC ¶ 61,109 (2000), *reh'g*, Order No. 637-A, 91 FERC ¶ 61,169 (2000), *reh'g denied*, Order No. 637-B, 92 FERC ¶ 61,062 (2000), *granted in part, denied in part, dismissed in part*, *INGAA v. FERC*, 285 F.3d 18 (D.C. Cir. 2002).

the Commission's policy regarding material deviations. Moreover, CP Express offered to provide similar terms to any other qualifying Anchor Shipper through its open season process.

Accordingly, the Applicants request that the Commission find that the above provisions do not present any risk of undue discrimination or affect the character of service provided to CP2 LNG or any other shipper, and are permissible deviations from CP Express's *pro forma* Rate Schedule FT Form of Service Agreement. Consistent with Commission precedent, prior to the start of service under the service agreement, CP Express will file the executed service agreement reflecting the non-conforming language and a tariff record identifying the agreement as a non-conforming agreement.

### **C. COST AND FINANCING**

This estimated costs of the Pipeline System are detailed in Pipeline Exhibit K. As shown there, the estimated total cost of the proposed expansion of the CP Express Pipeline System is approximately \$826 million. The Allowance for Funds Used During Construction (AFUDC) included in Exhibit K is calculated in compliance with Commission policy.<sup>53</sup>

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<sup>53</sup> Pipelines may begin accruing AFUDC when (1) capital expenditures for the project have been incurred and (2) activities (very broadly defined, including development and permitting work) that are necessary to get the construction project ready for its intended use are in progress, and the Commission has recognized that construction project-related costs incurred subsequent to initiation of the pre-filing process will be eligible for AFUDC accrual, save a showing to the contrary. *See Southern Natural Gas Co.*, 130 FERC ¶ 61,193 (2010). On April 16, 2026, the Commission determined in Docket No. PF26-8-000 that the CP Express project is not subject to its mandatory pre-filing procedures and review process. Accordingly, CP Express commenced the accrual of project related AFUDC amounts in April 2026.

Pipeline Exhibit L summarizes the plans for the financing of the CP Express expansion. The supporting schedules provided there reflect cash flows, debt principal repayment, income, and balance sheet for the initial construction period and the first three years of operations of the expansion.

#### **D. RECOURSE RATES AND FUEL RETAINAGE**

The calculation of the initial recourse rates for service on CP Express's proposed expansion is detailed in the Derivation of Rates section of Pipeline Exhibit N. Consistent with the Commission's policy on pricing expansion capacity, CP Express has designed its initial incremental firm transportation base reservation rate to recover the costs of its incremental Expansion. The proposed incremental base reservation rate, of \$5.6647 per Dth per month and the proposed incremental usage rate of \$0.01 / Dth are based on the estimated cost of service for the CP Express Pipeline Expansion recovered over the incremental transportation capacity, using a straight fixed variable rate design in accordance with Commission policy. That calculated incremental reservation rate, as well as the 100% load factor rate, exceeds CP Express's system base reservation rate for firm transportation service as approved by the Commission.<sup>54</sup> Therefore, consistent with the Certificate Policy Statement, CP Express proposes to charge the higher incremental firm transportation base reservation rate and related incremental usage rate for the firm capacity created by the CP Express Expansion Project.<sup>55</sup> CP Express proposes to utilize

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<sup>54</sup> In Docket No. CP22-22, CP Express proposed initial reservation rates for firm transportation service, after completion of its two phases, of \$4.203 per Dth per month. The Authorization Order at PP 51-57, however, required certain modifications to the proposed rate, which will be reflected when CP Express files to make its Tariff effective. CP Express calculates that the modifications ordered in the Authorization Order will result in an initial system reservation rate of \$4.057 per Dth per month.

<sup>55</sup> Certificate Policy Statement, 88 FERC ¶ 61,227 at 61,745-46. *See also, e.g., East Tennessee Natural Gas, LLC*, 191 FERC ¶ 61,004 at P 39 (2025); *MountainWest Overthrust Pipeline, LLC*, 189 FERC ¶ 61,046 at P 18 (2024).

its previously approved system IT rates (without any potential increase associated with the new proposed facilities) for all future interruptible transportation service because its expansion will be integrated with the existing operations and it would be difficult to determine shippers' use of specific facilities.

As detailed on Exhibit N, the proposed CP Express Pipeline Expansion cost of service is based on a capital structure with 75% debt and 25% equity (reflecting the planned financing), with an estimate of the future actual debt cost of 6.5%. In the Authorization Order, the Commission authorized CP Express to utilize a rate of return on equity ("ROE") of 14.0% for its initial rates. The Commission's general policy, however, is to not allow the continued use of the 14% ROE approved in a pipeline's initial certificate authorizations when determining the cost of service for subsequent incremental expansions but instead to require the use of the ROE approved in the most recent litigated NGA section 4 rate case if the pipeline has not subsequently established its own ROE.<sup>56</sup> Accordingly, CP Express has utilized in the cost of service for its expansion an ROE of 11.25%, the last applicable litigated pipeline ROE.<sup>57</sup> Finally, the CP Express Pipeline Expansion utilizes an annual depreciation rate (shown in Pipeline Exhibit O) of 4.0% (reflecting the 25-year primary term of its service agreement).

CP Express will recover the costs of fuel and lost-and-unaccounted for ("LAUF") gas through in-kind reimbursement percentages of its shipper's receipts. The retainage percentages will be adjusted annually with a true-up of any over- or under-recoveries through the tracker recovery mechanism set forth in Section 13 of the General Terms and

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<sup>56</sup> See, e.g., *Cameron Interstate Pipeline, LLC*, 189 FERC ¶ 61,048, at P 17 (2024).

<sup>57</sup> See *Panhandle E. Pipe Line Co., L.P.*, Opinion No. 885, 181 FERC ¶ 61,211 (2022).

Conditions (“GT&C”) of CP Express’ Tariff. In the Authorization Order at P 65, the Commission accepted that tracker mechanism as well as CP Express’s proposed initial fuel reimbursement percentage (after the completion of both phases) of 0.42% plus an initial LAUF percentage of 0.25 percent. Given the significant compression being added in the Project, CP Express estimates that an incremental fuel charge for its proposed Expansion would be higher than the existing system fuel retainage. CP Express’s system, however, will be fully integrated, with all activity on the system benefiting from the new compression as well as the previously authorized compression. Given the nature of CP Express’s integrated operations after the expansion, as well as the fact that CP2 LNG is the sole firm shipper on both the initial capacity and the firm capacity and that all the gas transported will be delivered to the CP2 LNG Terminal, separately calculated retainage rates would add unnecessary complexity for both CP Express and its sole firm shipper. Furthermore, with only the single firm shipper (who supports a single, rolled-in fuel retainage rate) there is no possible concern regarding existing shippers subsidizing the CP2 LNG Expansion Project fuel. Accordingly, the Applicants request Commission authorization for CP Express to charge a single, rolled-in fuel retainage rate, which CP Express currently estimates will be a total of 0.98% (based on total estimated fuel requirements collected on all throughput plus the previously authorized LAUF of 0.25%) following the completion of the CP2 LNG Expansion Project, other things held constant (though initial system operations prior to completion of the Expansion may alter that result). Despite the proposed use of a single rolled-in retainage rate, CP Express will keep separate books and accounting of costs and revenues for its Expansion, including with respect to fuel usage (which could be available in retainage tracker proceedings if

needed) in accordance with Section 154.309 of the Commission’s regulations. CP Express does not believe that any modification to the tracker mechanism set forth in its GT&C Section 13 is necessary to implement the proposed approach to rolled-in fuel retainage, but it could clarify the provision if deemed needed by the Commission in its future tariff filing to place the Expansion in-service.

## **VIII. PUBLIC INTEREST AND PUBLIC CONVENIENCE AND NECESSITY**

### **A. THE PROPOSED CP2 LNG TERMINAL EXPANSION IS NOT INCONSISTENT WITH THE PUBLIC INTEREST**

Section 3(a) of the NGA provides that “[t]he Commission shall issue an order upon application unless, after the opportunity for hearing, it finds that the proposed exportation or importation will not be consistent with the public interest.”<sup>58</sup> Thus, the NGA establishes a rebuttable presumption that proposed exports of natural gas and the related facilities are in the public interest.<sup>59</sup> To overcome this favorable presumption so as to justify any denial of an NGA Section 3 application, there must be an “affirmative showing of inconsistency with the public interest.”<sup>60</sup> Similarly, Section 153.7(c) of the Commission’s regulations, which implements Section 3(a) of the NGA, requires a showing only that the Project is not inconsistent with the public interest.<sup>61</sup> In its

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<sup>58</sup> 15 U.S.C. § 717(b)(a).

<sup>59</sup> See, e.g., *Sierra Club v. U.S. Dep’t of Energy*, 867 F.3d 189 at 203 (D.C. Cir. 2017) (“We have construed [NGA Section 3(a)] as containing a ‘general presumption favoring [export] authorization.’”); *W. Va. Pub. Serv. Comm’n v. U.S. Dep’t of Energy*, 681 F.2d 847, 856 (D.C. Cir. 1982) (“[S]ection 3 sets out a general presumption favoring such authorization, by language which requires approval of an application unless there is an express finding that the proposed activity would not be consistent with the public interest.”).

<sup>60</sup> *Sierra Club v. U.S. Dep’t of Energy*, 867 F.3d at 203 (quoting *Panhandle Producers & Royalty Owners Ass’n v. Econ. Regul. Admin.*, 822 F.2d 1105, 1111 (D.C. Cir. 1987)). See also, e.g., *Venture Global CP2 LNG, LLC*, 187 FERC ¶ 61,199, at P 23 (2024); *Commonwealth LNG, LLC*, 181 FERC ¶ 61,143 at P 14 (2022).

<sup>61</sup> 18 C.F.R. § 153.7(c).

Authorization Order, the Commission explained that it considers its scope of review to be “limited to consideration of the place of importation [or export], which necessarily includes the technical and environmental aspects of any related facilities,”<sup>62</sup> while issues related to the export of the natural gas commodity itself are “squarely and exclusively with the [DOE]’s wheelhouse.”<sup>63</sup>

The Commission has previously held that the construction and operation of the CP2 LNG Terminal is not inconsistent with the public interest.<sup>64</sup> The proposed CP2 LNG Expansion Project, which consists of adding additional, similar facilities onto the existing project clearly satisfies this legal standard for authorization as well. Commercially, the Applicants will operate the Expansion Project (just like the previously authorized facilities) under the terms and conditions mutually agreed with its customers, and CP2 LNG will bear all responsibility for the recovery of costs associated with construction and operation of the Project. Accordingly, the CP2 LNG Expansion Project does not implicate NGA Section 3(e)(4), which concerns LNG Terminals offering open access service.<sup>65</sup>

The proposed Expansion Project will advance the public interest, more than satisfying the statutory standard for authorization. In general, LNG exports will result in

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<sup>62</sup> See, e.g., *National Steel Corp.*, 45 FERC ¶ 61,100, at 61,333 (1988); *Sabine Pass Liquefaction, LLC and Sabine Pass LNG, L.P.*, 139 FERC ¶ 61,039 at P 27, n.35 (2012); *Dominion Cove Point LNG, LP*, 148 FERC ¶ 61,244 at P 29, n.28 (2014); *Sabine Pass Liquefaction Expansion, LLC*, 151 FERC ¶ 61,012, n.32 (2015); *Venture Global Calcasieu Pass, LLC, et al.*, 166 FERC ¶ 61,144 at P 16, n.20 (2019). See also *Venture Global CP2 LNG, LLC*, 187 FERC ¶ 61,199, at P 27 & n.59 (2024) (stating “The Commission’s authority under NGA section 3 applies only to the siting and the operation of the facilities necessary to accomplish an export” and citing supporting precedent); *Commonwealth LNG, LLC*, 181 FERC ¶ 61,143 at P 13 & n.25 (2022) (same).

<sup>63</sup> See, e.g., Authorization Order at P 27 (2024) (citing *Sierra Club v. FERC*, 827 F.3d 59 (D.C. Cir. 2016)).

<sup>64</sup> See *supra* n.1.

<sup>65</sup> 15 U.S.C. § 717b(e)(4).

new markets for the nation’s abundant natural gas supplies; increased economic growth, employment, tax revenues and net economic benefits; improved economic security for many U.S. allies and trading partners; increased use of environmentally-friendly natural gas overseas; and improvements in the U.S. balance of trade. The many benefits of LNG exports by the United States have been consistently recognized by the DOE, and particularly embraced by the DOE in the current Administration.<sup>66</sup> Just last fall, the DOE concluded that LNG exports by CP2 LNG advance the public interest,<sup>67</sup> and additional exports from the CP2 LNG Expansion Project will do so as well.

With respect to the benefits of the construction and operation of the CP2 LNG Expansion Project more specifically, Exhibit F of Resource Report No. 5 describes the anticipated direct impacts to business activity and tax receipts due to its construction and operation. The proposed CP2 LNG Expansion Project’s estimated cost exceeds \$10 billion. The proposed Project is expected to require a peak workforce of up to 3,000 workers on site for approximately six months. Over an approximately three year construction period, the construction workforce will typically average 1,600 workers for

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<sup>66</sup> See, e.g., Press Release, DOE, “DOE FINALIZES 2024 LNG EXPORT STUDY, PAVING WAY FOR STRONGER AMERICAN ENERGY EXPORTS” (May 19, 2025), *available at* <https://www.energy.gov/articles/doe-finalizes-2024-lng-export-study-paving-way-stronger-american-energy-exports> (“DOE makes several key findings, including: the United States has a robust natural gas supply that is sufficient to meet growing levels of exports while minimizing impacts to domestic prices; growing LNG exports increases our gross domestic product and expands jobs while improving our trade balance; and increasing U.S. LNG exports enhances domestic and international global security with no discernable impact to global greenhouse gas emissions. In sum, DOE concludes that the complete record from the 2024 LNG Export Study, inclusive of the Study, the comments received, and this Response to Comments, supports the proposition that exports of LNG from the United States are in the best interest of the American public.”). For more details regarding DOE’s conclusions, see DOE’s “Response to Comments for the 2024 LNG Export Study: Energy, Economic, and Environmental Assessment of U.S. LNG Exports,” which was publicly noticed at 90 Fed. Reg. 21,912 (May 22, 2025), and is available at: [https://www.energy.gov/sites/default/files/2025-05/2024%20LNG%20Export%20Study\\_Response%20to%20Comments\\_Final\\_05.19.2025.pdf](https://www.energy.gov/sites/default/files/2025-05/2024%20LNG%20Export%20Study_Response%20to%20Comments_Final_05.19.2025.pdf).

<sup>67</sup> See *supra* nn.12 and 15.

the Terminal Expansion and an additional average of 175 workers for the Pipeline System expansion, with an estimated average annual salary of \$150,000. The Project is projected to result in the permanent hiring of approximately 150 workers. Construction and related activities also will create business opportunities for local suppliers and service providers, likely boosting supply chain revenues and supporting job growth in related industries.

The Project's construction labor expense will amount to hundreds of millions of dollars and will further generate income taxes at the state level. Additionally, a portion of the construction payroll will be spent locally by both local and non-local workers. While it is difficult to predict the level of worker or Project spending that will be subject to sales tax, the amount will be noticeable to the local economy. In total, the Project is estimated to generate more than \$1.8 billion in net new local tax revenue from the start of construction through the estimated 20-year lifespan of the Project and to generate more than \$460 million in net new, direct tax revenue for the State of Louisiana during the same time. Thus, with addition of the Expansion Project proposed here, CP2 LNG terminal will produce enormous economic and tax benefits to Cameron Parish and the State of Louisiana.

The many benefits of LNG exports, as well as the significant Project-specific benefits detailed in Exhibit F, demonstrate that the proposed expansion of the CP2 LNG Terminal is in the public interest. The Exhibit F Environmental Report also shows that the Project has been designed to avoid, minimize and mitigate any environmental impacts, including the no-action alternative. The Commission should readily conclude that the CP2 LNG portion of the Expansion Project, with appropriate mitigation measures and conditions, is an environmentally acceptable action.

For purposes of its NEPA review, the Commission has historically prepared an Environmental Assessment (“EA”), rather than an EIS, for expansions of previously approved LNG Terminals like this one, recognizing that the environmental impacts of an expansion are relatively small in number and well-defined.<sup>68</sup> The Commission should certainly follow that approach here. Furthermore, the Commission’s NEPA review of the Project should take into consideration the “course correction” recently directed by the Supreme Court in *Seven County Infrastructure Coalition v. Eagle County, Colorado*<sup>69</sup> to reverse the “transform[ation]” of NEPA from its roots as “a modest procedural requirement,” into a significant “substantive roadblock” that can “paralyze” agency decision making.<sup>70</sup> The review also will be conducted in the context of recently enacted laws intended to streamline NEPA reviews and promote a more efficient process,<sup>71</sup> as well as President Trump’s day-one Unleashing American Energy Executive Order directing agencies to eliminate regulatory delays and expedite energy infrastructure permitting.<sup>72</sup>

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<sup>68</sup> See, e.g., *Sabine Pass Liquefaction, LLC*, 139 FERC ¶ 61,039, at P 46, *reh’g*, 140 FERC ¶ 61,076 at PP 23-28 (2012); *Dominion Cove Point LNG, LP*, 151 FERC ¶ 61,095 at PP 79-82 (2015); *Cameron LNG, LLC*, 155 FERC ¶ 61,141 at P 14 (2016); *Freeport LNG Development, L.P.*, 167 FERC ¶ 61,155 at PP 32-39 (2019); *Corpus Christi Liquefaction Stage III, LLC*, 169 FERC ¶ 61,135 at P 20 (2019).

<sup>69</sup> 145 S.Ct. 1497 (2025).

<sup>70</sup> *Id.* at 1513.

<sup>71</sup> Congress’s BUILDER Act amendments amended NEPA Section 102 and added new Sections 106-108 to provide more specific details on how agencies must comply with NEPA’s environmental review mandate and provide a more efficient and predictable permitting process. “Building United States Infrastructure through Limited Delays and Efficient Reviews Act of 2023.” Pub. L. 118–5, Div. C, Tit. III, § 321, 137 Stat. 38–39. Then in Section 60026 of the One Big Beautiful Bill Act, Congress enacted new Section 112 of NEPA to allow project sponsors to pay a fee to obtain shortened NEPA review deadlines. Pub. L. 119-21, § 60026 (July 4, 2025).

<sup>72</sup> Exec. Order No. 14,154, Unleashing American Energy, 90 Fed. Reg. 8,353 (Jan. 29, 2025). A series of other Executive Orders similarly seek to expedite the permitting of energy infrastructure and eliminate unnecessary regulatory delays, including Executive Order No. 14,156, Declaring a National Energy Emergency; Executive Order No. 14,213, Establishing the National Energy Dominance Council;

Moreover, the environmental review of the Expansion Project also will be conducted pursuant to revised NEPA implementing procedures designed to expedite and simplify the permitting process.<sup>73</sup> Importantly, the Commission’s new NEPA implementation guidance promoting “Efficient Environmental Reviews” provides for Staff to incorporate by reference into its NEPA documents materials from a prior EIS or EA “when the effect will be to cut down on bulk without impeding staff’s review and public review of the action.”<sup>74</sup> Here, the Commission has recently completed an EIS (plus a supplemental EIS) of CP2 LNG’s authorized facilities. The Expansion facilities will be added to the same footprint and are very similar to the previously authorized facilities. Therefore, this Application provides an ideal situation for the Commission Staff to follow this approach of incorporating portions of its prior NEPA review of the previously authorized CP2 LNG facilities to facilitate its NEPA review here. For all of these reasons, the completion of the NEPA process and requisite development of an EA for the Expansion Project should be conducted on a streamlined and efficient basis.

**B. CP EXPRESS’S PROPOSED EXPANSION IS CONSISTENT WITH THE PUBLIC CONVENIENCE AND NECESSITY AND THE COMMISSION’S POLICY STATEMENT**

In determining whether a proposed pipeline is required by the public convenience and necessity, the Commission considers whether it meets the criteria set forth in its

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and Executive Order No. 14,219, Ensuring Lawful Governance and Implementing the President’s “Department of Government Efficiency” Deregulatory Initiative.

<sup>73</sup> See Press Release, White House, “CEQ Releases Guidance to Streamline NEPA Reviews” (Sept. 29, 2025), available at <https://www.whitehouse.gov/articles/2025/09/ceq-releases-guidance-to-streamline-nepa-reviews/>; Press Release, FERC, “FERC Revises NEPA Procedures to Make Permitting More Efficient” (June 30, 2025), available at <https://www.ferc.gov/news-events/news/ferc-revises-nepa-procedures-make-permitting-more-efficient>.

<sup>74</sup> See Staff Guidance Manual on Implementation of NEPA (June 2025), issued on June 30, 2025, in conjunction with related Order No. 908 final rule, 191 FERC ¶ 61,237 (2025), at Section D.2, p. 14.

Certificate Policy Statement. By applying the Policy Statement framework, the Commission seeks to foster competitive markets, to protect captive customers, and to provide “incentives for the optimal level of construction and efficient customer choice.”<sup>75</sup> The Certificate Policy Statement establishes criteria for determining whether there is a need for a proposed project and balancing the benefits of a project against potential adverse consequences. The need for the expansion of the CP Express Pipeline is established by its precedent agreement with CP2 LNG and its need for the pipeline to transport gas to the terminal which will produce LNG exports that are in the public interest. The myriad benefits of additional LNG exports from CP2 LNG are not possible without the expansion of CP Express, which is needed to transport abundant domestic natural gas available in the region to the Terminal site. These benefits outweigh any adverse impacts of the CP Express Project.

The Certificate Policy requires an applicant to show that a proposed new project: (i) will not rely on subsidization from existing customers; (ii) has eliminated or minimized any adverse effects the project may have on existing customers, competing pipelines, and its captive customers; and (iii) has eliminated or minimized any adverse effects the project may have on the interests of landowners and surrounding communities.

The proposed expansion of the CP Express Pipeline System meets the Commission’s criteria as set forth in the Certificate Policy Statement and therefore is consistent with the public convenience and necessity. The “threshold requirement” in the Certificate Policy Statement that the project is financially viable without any subsidies by other customers is not an issue here. CP Express’s sole existing firm shipper

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<sup>75</sup> Certificate Policy Statement, 88 FERC ¶ 61,227 at 61,743.

is CP2 LNG, which is also the sole firm customer of the proposed CP Express Pipeline Expansion; accordingly, there similarly can be no concern with subsidies by other shippers. The expansion of the Pipeline System will not result in any adverse impact on competing pipelines or their captive customers because CP Express will be an open-access pipeline providing nondiscriminatory service in a competitive market, and the economic risk of the pipeline expansion facilities will be borne entirely by CP Express and its sole affiliated customer CP2 LNG. Construction and operation of the Pipeline System will serve to further enhance competition in the market by providing additional competitive service options. Furthermore, no other existing pipeline provides transportation service to the CP2 LNG Terminal, which is needed for the Project, and the CP Express Pipeline Expansion is not intended to replace service on any other pipeline. Furthermore, CP Express has taken appropriate steps to minimize any adverse impacts on landowners and surrounding communities, and the Project's location and design were selected to minimize impacts to the environment and to landowners to the greatest extent possible or practical from a pipeline safety and constructability perspective.

Moreover, the benefits associated with the proposed expansion of the Pipeline System are significant and outweigh any potential minimal adverse impacts that may occur. As previously stated, CP Express's portion of the CP2 LNG Expansion Project will cost approximately \$826 million, resulting in direct and indirect economic benefits to Texas and Louisiana. As explained in Resource Report No. 5, an average of 175 workers will be required for construction of the expansion of the Pipeline System over a period of 18 months. The employment of those workers will result in indirect economic benefits in the surrounding communities, as well as increased tax payments.

For the reasons discussed above and consistent with the criteria set forth in the Certificate Policy Statement, authorization of the proposed expansion of the CP Express Pipeline System as proposed herein is consistent with, and required by, the public convenience and necessity, and it should be certificated by the Commission under NGA Section 7.

## **IX. OTHER RELATED APPLICATIONS**

The Applicants know of no other application to supplement or effectuate this proposal that has been or must be filed with the Commission.

CP2 LNG plans to file, soon after this Application, a related application with DOE pursuant to NGA Section 3 for authorization to export LNG up to the equivalent of approximately 620.5 Bcf of natural gas per year (reflecting the proposed peak liquefaction of 11.7 MTPA to be added in the CP2 LNG Expansion Project) to both FTA and non-FTA nations. Consistent with historical DOE practice and timing, CP2 LNG expects that DOE will grant the FTA export authorization expeditiously, but may not act on the non-FTA export authorization prior to the Commission's order in this proceeding.

## **X. LIST OF EXHIBITS**

The Applicants believe this Application contains all the information necessary to explain fully their requests, and to support a finding that the requested authorizations are not inconsistent with the public interest and are consistent with the public convenience and necessity, as applicable. To the extent any required exhibits have been omitted, the Applicants request that the Commission treat the omitted material as inapplicable or otherwise unnecessary to disclose fully the nature and extent of the Project proposed herein.

The information attached hereto as exhibits, incorporated by reference, or omitted for the reasons stated:

**CP2 LNG Expansion - Terminal Exhibits**

|                                       |                                                                                                                                                                                                                                                                                                                                                                                                                          |
|---------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Terminal Exhibit A<br>§ 153.8(a)(1)   | A Certified Copy of the Certificate of Formation and Limited Liability Company Agreement of Venture Global CP2 LNG, LLC, as amended and restated, was included in CP2 LNG's original Application in Docket No. CP22-21. The current, updated Second Amended and Restated Limited Liability Company Operating Agreement was included in its recent filing in Docket No. CP26-55. Both are incorporated by reference here. |
| Terminal Exhibit B<br>§ 153.8(a)(2)   | An explanation of financial and corporate relationships is included.                                                                                                                                                                                                                                                                                                                                                     |
| Terminal Exhibit C<br>§ 153.8(a)(3)   | An Opinion of Counsel regarding authorized powers is included.                                                                                                                                                                                                                                                                                                                                                           |
| Terminal Exhibit D<br>§ 153.8(a)(4)   | Omitted as not applicable because no pipeline interconnection to import or export natural gas is proposed.                                                                                                                                                                                                                                                                                                               |
| Terminal Exhibit E<br>§ 153.8(a)(5)   | Omitted. For evidence concerning the receipt of LNG and detailed engineering and design information please refer to Resource Report 13 in Exhibit F/F-I (Environmental Report) filed separately as part of this Application.                                                                                                                                                                                             |
| Terminal Exhibit E-1<br>§ 153.8(a)(6) | Omitted. See Resource Reports 6 and 13 in Exhibit F/F-I (Environmental Report) filed separately as part of this Application.                                                                                                                                                                                                                                                                                             |
| Terminal Exhibit F<br>§ 153.8(a)(7)   | Environmental Report. Filed separately in Volume II to this Application as Exhibit F/F-I.                                                                                                                                                                                                                                                                                                                                |
| Terminal Exhibit G<br>§ 153.8(a)(8)   | A map showing the location of the Project is attached hereto.                                                                                                                                                                                                                                                                                                                                                            |
| Terminal Exhibit H<br>§ 153.8(a)(9)   | A list of Federal Authorizations is included.                                                                                                                                                                                                                                                                                                                                                                            |

## **CP Express Expansion – Pipeline Exhibits**

|                                                  |                                                                                                                                                                                                                                                                                                                                                                                       |
|--------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Pipeline Exhibit A § 157.14(a)(1)                | Corporate Formation Documents of Venture Global CP Express, LLC were included in its original Application in Docket No. CP22-22, and are incorporated by reference here. The current, updated Second Amended and Restated Limited Liability Company Operating Agreement of Venture Global CP Express, LLC is provided here. ( <i>Contains Privileged Information–DO NOT RELEASE</i> ) |
| Pipeline Exhibit B § 157.14(a)(2)                | Certified Copies of State Authorizations for Venture Global CP Express, LLC were included in its original Application in Docket No. CP22-22, and are incorporated by reference here.                                                                                                                                                                                                  |
| Pipeline Exhibit C § 157.14(a)(3)                | A list of names and business addresses of Officers and Directors for CP Express was included in its original application in Docket No. CP22-22, and is incorporated by reference here.                                                                                                                                                                                                |
| Pipeline Exhibit D § 157.14(a)(4)                | A detailed description of subsidiaries and affiliations is attached hereto.                                                                                                                                                                                                                                                                                                           |
| Pipeline Exhibit E § 157.14(a)(5)                | There are no other applications either pending or that must be filed with the Commission to effectuate the Project. Discussion of other pending applications pursuant to NGA Section 3 which significantly affect this Application is provided herein.                                                                                                                                |
| Pipeline Exhibit F § 157.14(a)(6)                | A map showing the location of the Pipeline System is provided.                                                                                                                                                                                                                                                                                                                        |
| Pipeline Exhibit F-I § 157.14(a)(6-a)            | Environmental Report. Filed separately in Volume II as Exhibit F/F-I.                                                                                                                                                                                                                                                                                                                 |
| Pipeline Exhibit G/G-I § 157.14(a)(7) and (a)(8) | Flow diagram and modeling files showing daily design capacity and reflecting operating conditions on the proposed facilities are provided separately under seal. ( <i>Contains CEII–DO NOT RELEASE</i> )                                                                                                                                                                              |

|                                         |                                                                                                                                                                                                                                                                                             |
|-----------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Pipeline Exhibit G-II<br>§ 157.14(a)(9) | Statement of engineering design data that explains the flow diagram is provided separately under seal. ( <i>Contains CEII-DO NOT RELEASE</i> )                                                                                                                                              |
| Pipeline Exhibit H<br>§ 157.14(a)(10)   | Omitted. Not Applicable.                                                                                                                                                                                                                                                                    |
| Pipeline Exhibit I<br>§ 157(a)(11)      | Attached hereto and provided under seal is a copy of the Precedent Agreement between CP Express and CP2 LNG.<br>( <i>Contains Privileged Information-DO NOT RELEASE</i> )                                                                                                                   |
| Pipeline Exhibit J<br>§ 157.14(a)(12)   | Omitted. See Terminal Exhibit H.                                                                                                                                                                                                                                                            |
| Pipeline Exhibit K<br>§ 157.14(a)(13)   | Detailed estimate of the expansion of the Pipeline System's total cost is included.                                                                                                                                                                                                         |
| Pipeline Exhibit L<br>§ 157.14(a)(14)   | Plan for financing the expansion of the Pipeline System is included.                                                                                                                                                                                                                        |
| Pipeline Exhibit M<br>§ 157.14(a)(15)   | Omitted. CP Express will contract (but has not as yet contracted) with experienced and qualified contractors for the construction of the Pipeline System. Operation and management of the Pipeline System, including the Expansion, will be carried out in the ordinary course of business. |
| Pipeline Exhibit N<br>§ 157.14(a)(16)   | Estimate of projected system-wide revenues, expenses and income for the Pipeline's first three years of operation is included.                                                                                                                                                              |
| Pipeline Exhibit O<br>§ 157.14(a)(17)   | Depreciation and depletion rates are included.                                                                                                                                                                                                                                              |
| Pipeline Exhibit P<br>§ 157.14(a)(18)   | CP Express provides only the proposed tariff record incorporating the incremental rates for its Expansion. No other Tariff changes are proposed.                                                                                                                                            |

## **Other Exhibits**

Exhibit Z1

Landowner Notice Materials

### **XI. FORM OF NOTICE**

A form of notice of this Application suitable for publication in the Federal Register is attached.

### **XII. REQUESTED AUTHORIZATIONS AND CONCLUSION**

The Applicants respectfully request that the Commission accept this Application for filing; publish in the Federal Register a notice of the Application; and issue an Order authorizing the Applicants to site, construct, install, own, operate and maintain the CP2 LNG Expansion Project by the end of this year so as to allow the Applicants to start construction of the Project promptly thereafter.

In addition, the Applicants request that the Commission process this Application in accordance with the shortened procedures set forth in Rules 801 and 802 of the Commission's Rules of Practice and Procedure, and that the Commission omit the intermediate decision procedures. If the Commission grants this request, the Applicants agree to waive oral hearing and the opportunity for filing exceptions to the decision of the Commission, while reserving the right to request rehearing and petition for judicial review of the Commission's decision. The Applicants request any waivers and other relief the Commission may deem necessary to grant the authorizations requested herein.

Respectfully Submitted,

/s/ J. Patrick Nevins

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*Counsel to:*

*Venture Global CP2 LNG, LLC and  
Venture Global CP Express, LLC*

Dated: May 26, 2026

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

|                                |   |                         |
|--------------------------------|---|-------------------------|
| Venture Global CP2 LNG, LLC    | ) | Docket Nos. CP26-__-000 |
| Venture Global CP Express, LLC | ) | and CP26-__-000         |

**NOTICE OF APPLICATION FOR AUTHORIZATIONS PURSUANT TO NGA SECTION 3  
AND FOR NGA SECTION 7(C) CERTIFICATE OF PUBLIC CONVENIENCE AND  
NECESSITY**

( , [ ] )

Take notice that on May 26, 2026 Venture Global CP2 LNG, LLC (CP2 LNG) and Venture Global CP Express, LLC (CP Express) (together, the “Applicants”) submitted for filing a joint application (Application) pursuant to Sections 3 and 7 of the Natural Gas Act and the rules and regulations of the Federal Energy Regulatory Commission for: (i) authorization pursuant to NGA Section 3 to site, construct, own, operate and maintain an expansion of CP2 LNG’s liquefied natural gas export terminal and associated facilities currently under construction on the east side of the Calcasieu Ship Channel, and the nearby Monkey Island, in Cameron Parish, Louisiana; and (ii) a certificate of public convenience and necessity pursuant to NGA Section 7(c) for CP Express to construct, own, operate and maintain an expansion created by the addition of new compression and related facilities on the CP Express Pipeline, which is also under construction and will extend from Jasper County in east Texas to the CP2 LNG Terminal, as fully described in the Application.

In addition to publishing the full text of this document in the Federal Register, the Commission provides all interested persons an opportunity to view and/or print the contents of this document via the Internet through the Commission’s Home Page (<http://www.ferc.gov>). From the Commission’s Home Page on the Internet, this information is available on eLibrary. The full text of this document is available on eLibrary in PDF and Microsoft Word format for viewing, printing, and/or downloading. To access this document in eLibrary, type the docket number excluding the last three digits of this document in the docket number field.

User assistance is available for eLibrary and the Commission’s website during normal business hours from FERC Online Support at (202) 502-6652 (toll free at 1-866-208-3676) or email at [ferconlinesupport@ferc.gov](mailto:ferconlinesupport@ferc.gov), or the Public Reference Room at (202) 502-8371, TTY (202) 502-8659. Email the Public Reference Room at [public.referenceroom@ferc.gov](mailto:public.referenceroom@ferc.gov).

Any questions regarding this Application should be directed to Fory Musser, Senior Vice President, Development, Venture Global LNG, Inc., 1001 19th Street North, Suite 1500, Arlington, VA 22209.

There are two ways to become involved in the Commission’s review of this project. First, any person wishing to obtain legal status by becoming a party to the proceedings for this project should, on or before the comment date stated below file with the Federal Energy Regulatory Commission, 888 First Street, NE, Washington, DC 20426, a motion to intervene in accordance with the requirements of the Commission’s

Rules of Practice and Procedure (18 C.F.R. 385.214 or 385.211) and the Regulations under the NGA (18 C.F.R. § 157.10). A person obtaining party status will be placed on the service list maintained by the Secretary of the Commission and will receive copies of all documents filed by the applicant and by all other parties. A party must submit 3 copies of filings made in the proceeding with the Commission and must provide a copy to the applicant and to every other party. Only parties to the proceeding can ask for court review of Commission orders in the proceeding.

However, a person does not have to intervene in order to have comments considered. The second way to participate is by filing with the Secretary of the Commission, as soon as possible, an original and two copies of comments in support of or in opposition to this project. The Commission will consider these comments in determining the appropriate action to be taken, but the filing of a comment alone will not serve to make the filer a party to the proceeding. The Commission's rules require that persons filing comments in opposition to the project provide copies of their protests only.

Persons who wish to comment only on the environmental review of this project should submit an original and two copies of their comments to the Secretary of the Commission. Environmental commenters will be placed on the Commission's environmental mailing list and will be notified of any meetings associated with the Commission's environmental review process. Environmental commenters will not be required to serve copies of filed documents on all other parties. However, the non-party commenters will not receive copies of all documents filed by other parties or issued by the Commission and will not have the right to seek court review of the Commission's final order.

As of the February 27, 2018 date of the Commission's order in Docket No. CP16-4-001, the Commission will apply its revised practice concerning out-of-time motions to intervene in any new Natural Gas Act section 3 or section 7 proceeding. *Tennessee Gas Pipeline Company, L.L.C.*, 162 FERC ¶ 61,167 at ¶ 50 (2018). Persons desiring to become a party to a certificate proceeding are to intervene in a timely manner.

The Commission encourages electronic submission of comments, protests, and interventions in lieu of paper using the "eFiling" link at <http://www.ferc.gov>. Persons unable to file electronically should submit an original and 3 copies of the protest or intervention to the Federal Energy Regulatory Commission, 888 First Street, N.E., Washington, D.C. 20426.

Intervention Deadline: \_\_\_\_\_

Debbie-Anne A. Reese,  
Secretary.