



April 8, 2019

Marc Talbert  
U.S. Department of Energy  
Office of Regulation and International Engagement  
Office of Fossil Energy, Forrestal Building  
1000 Independence Avenue SW  
Washington, DC 20503

Brandon DeBruhl  
Office of Information and Regulatory Affairs  
Office of Management and Budget  
New Executive Office Building  
735 17<sup>th</sup> Street NW  
Washington, DC 20503

RE: Changes to Form FE-746R, "Natural Gas Imports and Exports," OMB Control Number 1901-0294

Dear Mr. Talbert and Mr. DeBruhl:

On behalf of the Center for Liquefied Natural Gas (CLNG), I am writing in support of the U.S. Department of Energy (DOE) and the U.S. Energy Information Administration's (EIA) proposed changes to the Form FE-746R "Natural Gas and Import and Export" data collection. Further, we encourage the Office of Management and Budget to approve these changes.

CLNG advocates for public policies that advance the use of liquefied natural gas (LNG), and as such CLNG is particularly pleased that with the proposed changes to Form FE-746R, DOE and the EIA will no longer publish LNG import and export prices on a cargo basis. Rather these prices will be aggregated for all LNG cargoes by month at each point of exports. This change from transaction-specific price reporting to aggregate price reporting will help to keep U.S. LNG exporters competitive in a growing global market. By requiring that U.S. LNG exporters reveal cargo-specific price information, as previously reported by DOE, foreign competitors were given a negotiating advantage over U.S. exporters. Revealing information that foreign competitors may not release, and their buyers may prefer not to disclose, hurts U.S. exporters' ability to negotiate on an equal basis.

Further, U.S. exporters understand the benefit to DOE and EIA of price reporting for internal U.S. government purposes and believe that these proposed changes will allow for the U.S. government to continue to acquire the pricing information needed, while protecting U.S. LNG exporters. In addition, natural gas is the only energy commodity for which DOE publishes transaction-specific price information and these changes will correct this unnecessary differential treatment.

Finally, cargo by cargo price reporting does not accurately reflect the state of the industry. The complexities of LNG export contracting and the introduction of spot pricing into the marketplace create numerous explanations as to the final price of a specific cargo. Whereas, the monthly average price over time provides for a more accurate understanding of the market.

For the reasons outlined above, CLNG supports the proposed changes to Form FE-746R and urges the Office of Management and Budget to approve these changes.

Sincerely,

A handwritten signature in black ink, appearing to read 'CRiedl', written in a cursive style.

Charlie Riedl  
Executive Director  
Center for LNG

**The Center for Liquefied Natural Gas (CLNG)** advocates for public policies that advance the use of liquefied natural gas (LNG) in the United States, and its export internationally. A committee of the Natural Gas Supply Association (NGSA), CLNG represents the full LNG value chain, including LNG producers, shippers, terminal operators and developers, providing it with unique insight into the ways in which the vast potential of this abundant and versatile fuel can be fully realized. For more information, please visit [www.lngfacts.org](http://www.lngfacts.org).