

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

Venture Global Plaquemines LNG, LLC) CP26-__-000
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**ABBREVIATED APPLICATION OF
VENTURE GLOBAL PLAQUEMINES LNG, LLC
FOR LIMITED AMENDMENT OF
AUTHORIZATION UNDER SECTION 3 OF THE NATURAL GAS ACT**

Venture Global Plaquemines LNG, LLC (“Plaquemines LNG” or the “Applicant”) hereby files with the Federal Energy Regulatory Commission (“FERC” or the “Commission”), pursuant to Section 3 of the Natural Gas Act as amended (“NGA”)¹ and Part 153, Subpart B, of the Commission’s regulations,² this Abbreviated Application for Limited Amendment (“Amendment”) of the Order Granting Authorization under NGA Section 3 issued in Docket No. CP17-66 on September 30, 2019,³ as amended in the Order Amending Authorization issued in Docket No. CP22-92 on February 19, 2025.⁴ The Order issued NGA Section 3 authorization for Plaquemines LNG to site, construct, and operate a new liquefied natural gas (“LNG”) export terminal and associated facilities (the “Export Terminal” or “Project”) on the west bank of the Mississippi River in Plaquemines Parish, Louisiana.

The Plaquemines LNG Export Terminal as authorized in the Order has a nameplate liquefaction and export capacity of 20.0 million metric tons per annum (“MTPA”) of LNG and

¹ 15 U.S.C. § 717(f) (2018).

² 18 C.F.R. § 153.4 *et seq.* (2025).

³ *Venture Global Plaquemines LNG, LLC, Venture Global Gator Express, LLC*, 168 FERC ¶ 61,204 (2019) (“Order”).

⁴ *Venture Global Plaquemines LNG, LLC*, 190 FERC ¶ 61,113 (2025) (“Uprate Order”), *reh’g denied by operation of law*, 191 FERC ¶ 62,045 (2025).

peak capacity of 24.0 MTPA under optimal operating conditions.⁵ The Export Terminal receives natural gas from the pipeline system of an affiliate of Plaquemines LNG, Venture Global Gator Express, LLC (“Gator Express”), that was also authorized in the Order. In the Uprate Order, the Commission authorized an increase in the Plaquemines LNG Export Terminal’s peak liquefaction capacity from 24.0 MTPA to 27.2 MTPA, without any new facilities, construction activities, or modifications to the previously authorized facilities.⁶ Plaquemines LNG has spent over \$20 billion in connection with the Export Terminal, is exporting commissioning cargos of LNG while work on the Export Terminal is ongoing, and has nearly completed the construction (but not the requisite and substantial completion and commissioning) of all the facilities authorized by the Order. Status reports detailing the construction of the Project are filed monthly in Docket No. CP17-66.⁷

In this Amendment, Plaquemines LNG requests Commission authorization to increase the Export Terminal’s authorized peak liquefaction capacity achievable under optimal conditions from 27.2 MTPA to 35.0 MTPA of LNG – or from approximately 1,405.33 billion cubic feet (“Bcf”) to approximately 1,873 Bcf per year.⁸ As explained below, this proposed additional increase in the peak liquefaction capacity reflects refinements in the conditions and assumptions concerning the maximum potential output of the already authorized facilities. The requested increase in peak

⁵ Order at P 5.

⁶ Uprate Order at P 4. Plaquemines LNG is currently authorized by the Department of Energy (“DOE”) to export LNG to countries that have Free Trade Agreements with the United States in quantities up to 1,405.33 Bcf per year (approximately equivalent to 27.2 MTPA), while its non-FTA export authorization currently is limited to 1,240 Bcf per year (about 24 MTPA). *See* DOE Order No. 3866-B issued in its Docket No. 16-28-LNG on June 13, 2022 (amending Plaquemines LNG’s authorized level of exports to FTA nations) and DOE Order No. 4446 issued in that docket on October 16, 2019 (non-FTA authorization). Plaquemines LNG’s application to increase the level of its authorized non-FTA exports to up to 1,405.33 Bcf per year (approximately equivalent to 27.2 MTPA) remains pending before DOE.

⁷ Plaquemines LNG submitted its most recent monthly construction status report on December 10, 2025. Accession No. 20251210-5260.

⁸ This gas equivalence reflects the same LNG conversion ratio as utilized in the DOE export authorizations addressed in n.6 above. Of course, the gas volumes related to the proposed increase in peak liquefaction capacity of 35.0 MTPA will depend upon the composition of the actual feed gas.

liquefaction does *not* involve the construction of any new facilities. Plaquemines LNG respectfully requests that the Commission authorize the increased peak capacity by no later than June 25, 2026.⁹

In support of this Amendment, Plaquemines LNG respectfully submits the following:

I. APPLICANT INFORMATION

The exact legal name of the Applicant is Venture Global Plaquemines LNG, LLC. Plaquemines LNG is a Delaware limited liability company with its primary place of business located at 1001 19th Street North, Suite 1500, Arlington, VA 22209. Plaquemines LNG is primarily engaged in the business of developing the Export Terminal in Plaquemines Parish, Louisiana, as authorized in the Order.

Plaquemines LNG is an indirect, wholly owned subsidiary of Venture Global LNG, Inc. (“Venture Global”), which is a Delaware corporation with the same principal place of business as Plaquemines LNG. 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 Plaquemines LNG Terminal, Venture Global is the developer, owner, and operator of the Calcasieu Pass LNG Terminal that is currently in operation and the CP2 LNG Terminal that is under construction, both of which are located in Cameron Parish, Louisiana. Additional

⁹ Because no new facilities are proposed in this Amendment and the proposal does not involve significant state and local safety considerations that have not been previously addressed by the Commission, the Commission’s pre-filing procedures for the review of LNG terminal facilities are not applicable to this filing, in accordance with Section 157.21(a) of the Commission’s regulations. *See* 18 C.F.R. § 157.21. For that reason, applicants have not participated in the pre-filing process before proposing other similar uprate amendments for authorized LNG facilities. *See, e.g., Venture Global Plaquemines LNG, LLC*, 190 FERC ¶ 61,113 (2025); *Venture Global Calcasieu Pass, LLC*, 184 FERC ¶ 61,185 (2023). In addition, the Director of the Office of Energy Projects has recently formally granted waivers of the pre-filing process for other LNG uprate projects. *See Rio Grande LNG, LLC, et al., Waiver of Pre-Filing Process*, Docket No. PF26-1-000 (Nov. 20, 2025); *Corpus Christi Liquefaction, LLC, et al., Waiver of Pre-Filing Process*, Docket No. PF26-2-000 (Nov. 20, 2025).

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 98.7% of the combined voting power of VG's stock, and controls the management and policies of Venture Global and, thus, controls Plaquemines LNG. VG Partners is a Delaware limited liability company 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.

II. COMMUNICATIONS

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

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*Persons designated to receive service pursuant to Rule 2010 of the Commission's Rules of Practice and Procedure. The Applicant respectfully request 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.

III. BACKGROUND

The Plaquemines LNG Export Terminal authorized in the Order and Uprate Order and currently nearing completion of construction and being commissioned is located on an approximately 632-acre site on the west bank of the Mississippi River, near mile marker 55, in Plaquemines Parish, Louisiana, on land leased from the Port of Plaquemines. The Project, as currently authorized, has a nameplate liquefaction and export capacity of 20.0 MTPA and a peak achievable capacity of 27.2 MTPA under optimal operating conditions. The liquefaction facilities consist of 18 liquefaction blocks, each containing two single mixed refrigerant process trains, a

refrigerant storage site, and piping that connects the refrigerant storage site and the process trains. The liquefaction blocks have a nameplate capacity of 1.1 MTPA each.

Other authorized facilities for the Export Terminal include the following:

- one natural gas gate station;
- six pretreatment blocks to remove carbon dioxide, hydrogen sulfide, and water from the natural gas received from Gator Express;
- four full containment storage tanks, each with a capacity of approximately 200,000 cubic meters;
- two boil-off, flash, and gas relief systems;
- three LNG loading berths, each designed to accommodate LNG carriers with capacity of 120,000 to 185,000 cubic meters;
- two 710-megawatt electric power generation facilities;
- one warm flare, one cold flare, one spare flare, one low pressure flare, and one marine flare;
- safety and security systems; and
- other appurtenant facilities.

In April 2021, Venture Global announced that KBR Inc. and the Zachry Group would partner in a new joint venture (“KZJV”) to be the lead EPC contractor for the Project. Plaquemines LNG’s construction on the Plaquemines Terminal site commenced on August 18, 2021. During

2021 and continuing into early 2022, Plaquemines LNG entered into long-term LNG sales and purchase agreements (“SPAs”) for a total of 13 MTPA with five major international companies. On May 25, 2022, Venture Global announced its final investment decision (“FID”) and the closing of the project financing for the initial 13.33 MTPA of nameplate capacity (12 liquefaction blocks) phase of the Plaquemines LNG project (and the affiliated Gator Express Pipeline), with a lender group providing debt for the \$13.2 billion construction financing including many of the world’s leading Asian, European, and North American project finance banks.¹⁰ Since that date (indeed from even sooner), Plaquemines LNG has proceeded with construction and commissioning of the project so as to begin supplying incremental American natural gas to international markets safely and as quickly as feasible.

On March 13, 2023, Venture Global announced its FID and the closing of an additional \$7.8 billion project financing for the second phase of the Plaquemines LNG project (including the remaining six liquefaction blocks), again with a lender group including the world’s leading banks.¹¹ In total, Plaquemines LNG by that time had entered into fourteen SPAs for its full 20 MTPA nameplate capacity, with 19.7 MTPA of it contracted for a 20-year term commencing at the commercial operations date of the relevant Phase of the Plaquemines LNG project.

Venture Global’s innovative approach to LNG project construction – pioneered at the Calcasieu Pass LNG facility that is now fully in commercial operation – involves mid-scale,

¹⁰ See Press Release, *Venture Global Announces Final Investment Decision and Financial Close for Plaquemines LNG*, May 25, 2022, available at <https://ventureglobal.com/2022/05/25/venture-global-announces-final-investment-decision-and-financial-close-for-plaquemines-lng/>. Thus, whereas for regulatory purposes and under the Authorization Order, the Plaquemines LNG Project consists of two phases of nameplate capacity of 10 MTPA each, for commercial and financing purposes, the first Phase encompassed essentially two-thirds of the Plaquemines LNG Project’s capacity.

¹¹ See Press Release, *Venture Global Announces Final Investment Decision and Financial Close for Phase Two of Plaquemines LNG*, Mar. 13, 2023, available at <https://ventureglobal.com/2023/03/13/venture-global-announces-final-investment-decision-and-financial-close-for-phase-2-of-plaquemines-lng/>.

factory-fabricated liquefaction trains that are built and assembled off-site and then shipped to the Project site fully-assembled and packaged for installation. The trains and other facilities, many of which are likewise factory-fabricated offsite, are then commissioned and begin producing LNG sequentially after receiving the requisite approvals from the Commission Staff. This approach allowed Plaquemines LNG to commence LNG production and export its first commissioning cargo in December 2024 (just over two and a half years after the Phase 1 FID and about five years after the Authorization Order).¹² While the Project’s modular design and phased commissioning approach enabled Plaquemines LNG to accelerate construction and to commence LNG production expeditiously, it also entails a substantially longer commissioning process than for traditional LNG export projects (with a few, very large “stick-built” liquefaction trains). Plaquemines LNG has filed with the Commission in Docket No. CP17-66 monthly construction reports and, after LNG production commenced, weekly commissioning reports providing details regarding the progress of the Plaquemines LNG Project.

Plaquemines LNG currently anticipates receiving authorization from Commission Staff to place in-service all of its Phase 1 facilities (in the commercial and financing sense, meaning 24 liquefaction trains and related facilities) by the fourth quarter of 2026, and the remaining Phase 2 facilities (in the commercial and financing sense, meaning 12 liquefaction trains and related facilities) in-service by mid-2027. Accordingly, Plaquemines LNG filed with the Commission on September 19, 2025, a request for an 15-month extension of the condition in the Order requiring all the Authorized Facilities to be made available for service within seven years of the date of the

¹² On December 20, 2024, the Commission approved Plaquemines LNG’s request to load the first LNG export commissioning cargo. *Venture Global Plaquemines LNG, LLC*, Docket No. CP17-66-000, Accession No. 20241220-3027 (Dec. 20, 2024) (delegated order).

Order – *i.e.*, by September 30, 2026.¹³ The Commission Staff, acting under delegated authority, recently granted that request for an extension, thereby allowing Plaquemines LNG until December 31, 2027 to place all of the Authorized Facilities in-service.¹⁴

On November 17, 2025, Plaquemines LNG together with its affiliate Plaquemines Expansion, LLC filed an NGA Section 3 application for the Plaquemines Expansion Project, requesting authorization for the siting, construction, and operation of new facilities to be located adjacent to the site of the existing Export Terminal. That application is pending before the Commission in Docket No. CP26-27. This Application for an Amendment of the authorization for the existing facilities, of course, is entirely unrelated to the Expansion Project and does not depend upon it in any way.

IV. PROPOSAL TO INCREASE AUTHORIZED PEAK LIQUEFACTION

As currently authorized by the Commission, the Plaquemines LNG Export Terminal has a peak liquefaction production output of 27.2 MTPA under optimal circumstances. Liquefaction capacity is dependent on ambient temperatures: during colder months, the production capacity is expected to be as much as 10% higher than during summer months. In addition, the Project is designed to assume a certain number of days of maintenance, or other planned and unplanned down-time, and still achieve the design annual liquefaction capacity. In certain years, Plaquemines LNG expects that it will likely require less down-time than was assumed in the Project design – resulting in an increase in its peak liquefaction capability in those years compared to the nameplate capacity.

¹³ Authorization Order, Ordering Paragraph (B)(1).

¹⁴ Unpublished letter order issued in Docket No. CP17-66-002 on Oct. 16, 2025. Accession No. 20251016-3130.

Recognizing such factors, Plaquemines LNG originally estimated when it commenced the FERC process in 2015, based on pre-Front End Engineering and Design (“pre-FEED”) studies, that the Project’s peak liquefaction capability under optimal conditions would be 24.0 MTPA, as later authorized in the Order. Subsequently, as the design of the Project progressed further, Plaquemines LNG recognized that its planned facilities would have greater output than previously expected, leading to its request in March 2022 for approval of an increase in the authorized peak liquefaction capability to 27.2 MTPA, as ultimately approved in the Uprate Order.

In the nearly four years since its applied for its prior uprate amendment, Plaquemines LNG further refined and finalized the design of its Project, completed the construction of its liquefaction facilities (but not all facilities), and began producing LNG and exporting commissioning cargos. Plaquemines LNG produced its first LNG from its initial liquefaction block in December 2024 and brought all 18 of its liquefaction blocks online sequentially over the course of 2025, with the last one commencing LNG production in late October. While finalizing the design and construction of its liquefaction facilities, and with its experience producing LNG during the ongoing commissioning process, Plaquemines LNG has learned significant lessons about how best to maximize the production output of its authorized facilities. Plaquemines LNG has also continued to work with experts at its lead EPC contractor KZJV, as well as its equipment suppliers, to refine its facility design and operations to safely maximize the optimal peak output. As a result of that process, Plaquemines LNG has concluded that its peak liquefaction capacity under optimal conditions is well in excess of the 27.2 MTPA it previously authorized by the Commission in the Uprate Order.

As demonstrated by the technical materials included in Exhibit E to this Amendment, the achievable peak liquefaction of the authorized Project facilities is 35.0 MTPA under optimal

operating conditions. In addition to potential optimal ambient air temperatures and gas composition scenarios, other primary factors contributing to the increased achievable peak LNG production capacity include, but are not limited to, control system refinements; maintenance program improvements that minimize downtime and maximize the benefits of the sparing capacity inherent in the Export Terminal's design; and various enhancements to production and workflow processes that Plaquemines LNG has developed and implemented since the time of the Uprate Order. Plaquemines LNG emphasizes that this increased peak LNG production capacity does not require the construction of any new facilities or the material modification of any existing facilities. In addition, this increased peak LNG production capacity will have no impact on the schedule to commission and complete the Plaquemines Facility by the dates cited on page 8 of this Application.

The increased LNG production at peak levels will not alter the conclusions of the previously reviewed and approved hazard analysis for the Project, or otherwise adversely affect its conformance with applicable safety requirements. Plaquemines LNG recognizes that the final determination of whether the Export Terminal complies with federal regulations of 49 C.F.R. Part 193 is made by the Pipeline and Hazardous Materials Safety Administration ("PHMSA"). Accordingly, Plaquemines LNG will promptly notify PHMSA Staff of this Amendment and work with PHMSA Staff to address any questions that they may have and to confirm that the Project continues to meet all of PHMSA's siting requirements.

More generally, Plaquemines LNG can achieve this peak LNG production while remaining in full compliance with all applicable regulatory requirements. In particular, Plaquemines LNG has determined that the increased liquefaction capacity requested in this Amendment can be achieved within the allowed emissions limits under the Terminal's current air permits.¹⁵

¹⁵ Plaquemines LNG holds a Prevention of Significant Deterioration ("PSD") Permit No. PSD-LA-808 (M3) and a Title V Operating Permit No. 2240-00443-V3.

Finally, the original Letter of Recommendation and Follow-on Waterway Suitability Assessment (“WSA”) issued for the Project by the U.S. Coast Guard (“USCG”) explained that an average of 6 LNG Carrier visits to the Terminal were projected per week (or approximately 310 per year), and considered an upper bound of between of three hundred and forty (340) and of three hundred and eighty (380) port calls per year of average LNG carrier sizes. In connection with Plaquemines LNG’s application to increase the peak liquefaction capacity of its facilities to 27.2 MTPA, the U.S. Coast Guard confirmed that the potential increase in ship traffic is still within the upper limit of 380 LNG carriers.¹⁶

Earlier this year, Plaquemines LNG submitted an updated Letter of Intent and an updated WSA to the USCG requesting approval to increase the number of LNG carrier calls to the Terminal to 950 LNG carrier visits per year. By letter dated October 24, 2025, the USCG approved this request and the approval letter is attached hereto as Exhibit E. Please note that the 950 annual approved Carrier visits is more than sufficient to cover the export of LNG covered by the Uprate Order, this proposed uprate Amendment and the unrelated expansion submitted in November 2025 (pending before the Commission in Docket No. CP26-27).

Because Plaquemines LNG does not propose any new facilities or construction in this Amendment, its authorization will not constitute a major federal action significantly affecting the quality of the human environment within the meaning of the National Environmental Policy Act of 1969, 42 U.S.C. § 4321, *et seq.* (“NEPA”). Accordingly, Plaquemines LNG is not including with this filing the environmental reports typically required by Commission activity that does trigger NEPA. This approach is consistent with that of other LNG projects that similarly have

¹⁶ Uprate Order at P 42.

requested authorization for peak liquefaction operations without any change in the authorized facilities.¹⁷

V. THE PROPOSED AMENDMENT IS IN 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.”¹⁸ Thus, the NGA establishes a rebuttable presumption that proposed exports of natural gas and the related facilities are in the public interest.¹⁹ 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.”²⁰ 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.²¹

The Commission concluded in the Order that the siting, construction, and operation of the Export Terminal, as previously proposed by Plaquemines LNG, is not inconsistent with the public

¹⁷ See the applications leading to the Commission orders authorizing increased peak liquefaction capacity for other LNG export projects in *Sabine Pass Liquefaction, LLC*, 146 FERC ¶ 61,117, *reh’g*, 148 FERC ¶ 61,200 (2014) (approving increased peak authorized LNG production capacity based on more detailed engineering analysis); *Freeport LNG Development, L.P., et al.*, 156 FERC ¶ 61,019 at P 13 (2016) (same); *Magnolia LNG LLC*, 171 FERC ¶ 61,231 at P 8 (2020) (same); *Golden Pass LNG Terminal LLC*, 174 FERC ¶ 61,053 at P 9 (2021) (same); *Corpus Christi Liquefaction, LLC*, 177 FERC ¶ 61,029 at P 11 (2021) (same); *Sabine Pass Liquefaction, LLC*, 177 FERC ¶ 61,030 at P 13 (2021) (same); *Venture Global Calcasieu Pass, LLC*, 184 FERC ¶ 61,185 at P 37 (2023) (same); *Venture Global Plaquemines LNG, LLC*, 190 FERC ¶ 61,113 at P 59 (2025) (same).

¹⁸ 15 U.S.C. § 717(b)(a).

¹⁹ 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.”).

²⁰ *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).

²¹ 18 C.F.R. § 153.7(c).

interest.²² In support of that conclusion, the Commission recognized that: (1) the Export Terminal will be located on land owned by the Port of Plaquemines and leased for the Project that is zoned for heavy industrial uses; (2) the final EIS prepared by Commission Staff found that most of the environmental impacts would be reduced to less than significant levels with the implementation of the required mitigation measures; (3) with the conditions required, the environmental impacts of the Project will be appropriately and reasonably reduced and the Project can be constructed and operated safely; (4) PHMSA issued a Letter of Determination indicating Plaquemines LNG has demonstrated that the siting of its proposed LNG facilities complies with applicable federal safety standards; and (5) Plaquemines LNG will operate the Export Terminal under the terms and conditions mutually agreed to by its customers and will be solely responsible for the recovery of all costs associated with the facilities.²³

In the Uprate Order, the Commission recognized that revised engineering analysis supported the increased production capacity of the Plaquemines LNG Export Terminal, that the increase would not result in any significant adverse environmental impacts, and that it was consistent with PHMSA siting requirements.²⁴ Accordingly, the Commission held Plaquemines LNG's prior uprate amendment proposal to be not inconsistent with the public interest.²⁵

Once again here, authorizing Plaquemines LNG to align the authorized peak liquefaction with the Project's actual physical capabilities as now further understood, and thereby allow it to produce the most low-cost LNG that it possibly and safely can using the authorized facilities, is plainly consistent with the public interest. The Commission has repeatedly recognized, in the

²² Order at P 19.

²³ *Id.* at PP 16-18.

²⁴ Uprate Order at PP 12-14.

²⁵ *Id.* at P 15.

Uprate Order and numerous other similar cases: (1) that calculating the maximum or peak capacity of a given set of liquefaction facilities may not be possible at the time an initial application for construction is filed and (2) it is appropriate for an ultimate authorization to reflect the maximum or peak capacity, as such a level represents the actual potential production of LNG.²⁶ Given that the further refinement in the design and operation of the authorized facilities and Plaquemines LNG's lessons learned during commissioning demonstrate a peak liquefaction capacity under optimal conditions of 35.0 MTPA, the Commission should recognize that the proposed Amendment is not inconsistent with the public interest and accordingly amend the Project's authorization to reflect this increased peak capability.

VI. LIST OF EXHIBITS AND NOTICE

This is an abbreviated Application for an Amendment to an existing NGA Section 3 authorization and, as such, contains only the information required to disclose fully the nature and extent of the proposed Amendment, and includes only the Exhibits that have changed from the materials included in Plaquemines LNG's original Application and related materials approved in the Order in Docket No. CP17-66, as well as the materials provided in Plaquemines LNG's amendment application in Docket No. CP22-92. Plaquemines LNG believes that this Amendment contains all the information necessary to explain fully its request, and to support a finding that the requested authorization, as amended, is not inconsistent with the public interest. To the extent any required exhibits or information is omitted, Plaquemines LNG requests that the Commission treat the omitted material as inapplicable or otherwise unnecessary to disclose fully the nature and

²⁶ Uprate Order at P 13. *See also, e.g., Sabine Pass Liquefaction, LLC*, 146 FERC ¶ 61,117 at P 12 (2014); *Freeport LNG Development, L.P., et al.*, 156 FERC ¶ 61,019 at P 13 (2016); *Magnolia LNG LLC*, 171 FERC ¶ 61,231 at P 8 (2020); *Golden Pass LNG Terminal LLC*, 174 FERC ¶ 61,053 at P 9 (2021); *Corpus Christi Liquefaction, LLC*, 177 FERC ¶ 61,029 at P 7 (2021); *Sabine Pass Liquefaction, LLC*, 177 FERC ¶ 61,030 at P 9 (2021).

extent of the proposed amendment. To the extent necessary, Plaquemines LNG also respectfully requests any related waiver of the Commission's regulations.

The information required by Section 153.8 of the Commission's regulations is set forth below, attached hereto as exhibits, or omitted for the reasons stated:

Exhibit A § 153.8(a)(1)	A Certified Copy of the Certificate of Formation and Limited Liability Company Agreement of Plaquemines LNG, as amended and restated, as well as with applicable state authorizations, was included in Plaquemines LNG's original Application, which is incorporated herein by reference. Plaquemines LNG's updated Limited Liability Company Agreement was submitted in its amendment application in Docket No. CP22-92, which is also incorporated herein by reference.
Exhibit B § 153.8(a)(2)	An explanation of Plaquemines LNG's financial and corporate relationships was provided in the application submitted in FERC Docket No. CP26-27 and is incorporated here by reference.
Exhibit C § 153.8(a)(3)	An Opinion of Counsel regarding authorized powers is included.
Exhibit D § 153.8(a)(4)	Omitted as not applicable because no pipeline interconnection to import or export natural gas is proposed.
Exhibit E § 153.8(a)(5)	Detailed engineering and design information supporting the Amendment is attached. This exhibit has been marked "CUI//CEII/PRIV Contains Critical Energy Infrastructure Information and Confidentially, Commercially Sensitive, Non-Public and Proprietary Information – DO NOT RELEASE."
Exhibit E-1 § 153.8(a)(6)	Omitted. See Resource Reports 6 and 13 in Exhibit F/F-I (Environmental Report) filed as part of Plaquemines LNG's original

	Application. This Amendment will not alter the seismic risks of the Project.
Exhibit F § 153.8(a)(7)	U.S. Coast Guard Approval of the Updated Waterway Suitability Assessment. The remainder of the Environmental Report is omitted as Plaquemines LNG does not propose to construct or modify any facilities.
Exhibit G § 153.8(a)(8)	Omitted, as the location of the Project is unchanged.
Exhibit H § 153.8(a)(9)	Omitted, as no Federal Authorizations other than from the Commission are necessary.

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

VII. OTHER RELATED APPLICATIONS

There are no other related applications that the Commission must consider in conjunction with this Amendment.²⁷ The DOE previously authorized Plaquemines LNG's export from the Export Terminal of up to 1,405.33 Bcf per year to FTA nations, which equates to the peak capacity of 27.2 MTPA currently authorized by the Commission.²⁸ Plaquemines LNG plans to submit an application with DOE promptly following this filing to increase its export authorization (for both FTA and non-FTA nations) to 1,873 Bcf per year consistent with the increased peak capacity of 35.0 MTPA proposed in this Amendment.

²⁷ Because the Project will not include facilities at the border of the United States with either Canada or Mexico and will not otherwise involve a physical interconnection between the United States and a foreign country, the Project does not require a Presidential Permit under the Commission's regulations at Section 153.15 or pursuant to Executive Order 10485.

²⁸ See n.6 *supra*.

VIII. REQUEST FOR EXPEDITED AUTHORIZATION AND CONCLUSION

For all the reasons set forth above, Plaquemines LNG submits that the proposed amendment of its authorization to reflect the actual peak liquefaction of the authorized Project facilities under optimal conditions is manifestly not inconsistent with the public interest. Accordingly, Plaquemines LNG respectfully requests that the Commission accept for filing this abbreviated Application for an Amendment of the NGA Section 3 authorization for the Project; publish in the *Federal Register* a notice of this Amendment; and issue an Order approving the Amendment as proposed. As part of that process, Plaquemines LNG also requests that the Commission find that authorization of the proposed Amendment does not constitute a major federal action significantly affecting the quality of the human environment, within the meaning of NEPA.

As previously noted, Plaquemines LNG currently is nearing completion of construction and undertaking ongoing commissioning. Expedited Commission Staff and Commission review of this Amendment and the prompt issuance of the requested authorization will assist Plaquemines LNG in maximizing LNG production from a facility that is already approved, financed, and is currently exporting LNG. Accordingly, Plaquemines LNG respectfully requests that the Commission act on this application as soon as possible and issue the requested authorization by no later than June 25, 2026. Plaquemines LNG requests that the Commission waive, to the extent necessary, any of its general rules and regulations applicable to this filing in order to grant the requested authorization as soon as possible.

Plaquemines LNG requests that the Commission process this Amendment 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, Plaquemines LNG agrees 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.

Respectfully submitted,

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*Counsel to:
Venture Global Plaquemines LNG, LLC*

Dated: December 19, 2025

proceeding. Only parties to the proceeding can ask for court review of Commission orders in the proceeding.

However, a person does not have to intervene 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 to the party or parties directly involved in the protest.

Protests and interventions may be filed electronically via the Internet in lieu of paper; see 18 CFR 385.2001(a)(1)(iii) and the instructions on the Commission's website under the "e-filing" link. The Commission strongly encourages electronic filings.

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. Persons desiring to become a party to a certificate proceeding are to intervene in a timely manner. If seeking to intervene out-of-time, the movant is required to "show good cause why the time limitation should be waived," and should provide justification by reference to factors set forth in Rule 214(d)(1) of the Commission's Rules and Regulations.

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.

Comment Date: 5:00 pm Eastern Time on _____

Debbie-Anne A. Reese,
Secretary.

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

Venture Global Plaquemines LNG, LLC) CP26-__-000
)
)

Exhibit C

Opinion of Counsel

1401 McKinney Street, Suite 2600
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December 19, 2025

Ms. Debbie-Anne Reese, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20426

Re: Venture Global Plaquemines LNG, LLC
Docket No. CP26_____
Application for Limited Amendment
Exhibit C – Opinion of Counsel

Dear Secretary Reese:

Venture Global Plaquemines LNG, LLC (“Plaquemines LNG”) is applying to the Federal Energy Regulatory Commission (“Commission”), pursuant to Section 3 of the Natural Gas Act as amended (“NGA”) and Part 153, Subpart B, of the Commission’s regulations, for authorization to amend the authorizations issued by the Commission in: (1) Docket No. CP17-66 on September 30, 2019 to site, construct, and operate a new liquefied natural gas (“LNG”) export terminal and associated facilities (the “Project”) along the Mississippi River in Plaquemines Parish, Louisiana; and (2) Docket No. CP22-92 on February 19, 2025 to increase the Project’s peak liquefaction capacity to 27.2 MTPA.

In its application for a limited amendment of its authorizations, Plaquemines LNG proposes to increase the Project’s authorized peak liquefaction capacity achievable under optimal conditions from 27.2 to 35.0 million metric tons per annum of LNG.

I furnish this Opinion pursuant to Section 153.8(a)(3) of the Commission’s regulations, 18 C.F.R. Section 153.8(a)(3)(2025), which requires, as Exhibit C to a Part 153 application, an opinion of counsel that the proposal is within the authorized powers of the applicant and that the applicant has complied with the laws and regulations of the states in which it operates. For purposes of this Opinion, I have examined all relevant documents and of the law as I deemed necessary.

Based on the foregoing examination, I am of the opinion that the proposal set forth in the amendment application of Plaquemines LNG is within the authorized powers of Plaquemines LNG, and that Plaquemines LNG is in compliance with the laws and regulations of the states in which it operates.

Respectfully submitted,

/s/ Keith Larson

Keith Larson
General Counsel