UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

Corpus Christi Liquefaction Stage III, LLC Corpus Christi Liquefaction, LLC)))	Docket No. CP18000
Cheniere Corpus Christi Pipeline, L.P.)))	Docket No. CP18000

APPLICATION FOR AUTHORIZATIONS UNDER THE NATURAL GAS ACT

Karri Mahmoud Joseph Moake Cheniere Energy, Inc. 700 Milam Street, Suite 1900 Houston, TX 77002 Telephone: (713) 375-5000 Email: Karri.Mahmoud@cheniere.com Email: Joseph.Moake@cheniere.com Lisa M. Tonery Mariah T. Johnston Orrick, Herrington & Sutcliffe LLP 51 West 52nd Street New York, N.Y. 10019-6142 Telephone: (212) 506-3710 Email: <u>ltonery@orrick.com</u> Email: <u>mjohnston@orrick.com</u>

TABLE OF CONTENTS

I.	INFORMATION REGARDING THE APPLICANTS			
II.	COMMUNICATIONS			
III.	BACK	GROU	ND	3
IV.	EXEC	UTIVE	SUMMARY	5
V.	DETA	ILED P	ROJECT DESCRIPTION	8
	A.	Stage	3 LNG Facilities	8
		1.	Liquefaction Facilities	8
		2.	LNG Storage Tank	9
		3.	Supporting Infrastructure	10
	B.	Stage	3 Pipeline	12
		1.	Pipeline	12
		2.	Sinton Compressor Station	13
		3.	Metering and Regulating Stations	13
		4.	Launcher/Receiver Facilities	13
		5.	Mainline Valve Facilities	14
VI.	MAR	KET DE	EMAND	14
VII.	ENVI	RONMI	ENTAL COMPLIANCE	15
VIII.	THE A PUBL	AUTHO IC INT	RIZATIONS REQUESTED ARE CONSISTENT WITH THE EREST AND ARE REQUIRED BY THE PUBLIC	16
	CONV	ENIEN	ICE AND NECESSITY	16
	А.	The St	age 3 LNG Facilities Are Not Inconsistent with the Public Interest	16
	B.	The St Necess	age 3 Pipeline Is Consistent with the Public Convenience and sity, and with the Commission's Certificate Policy Statement	19
IX.	ADDI' PIPEL	TIONA JINE	L INFORMATION WITH RESPECT TO THE STAGE 3	21
	A.	Open S	Season	21
	B.	Propos	sed Services	21
	C.	Cost a	nd Financing	22

	D.	Rates and Tariff	. 22
X.	CERT	IFICATION	. 24
XI.	WAIV	ER OF HEARING	. 25
XII.	PRES	IDENTIAL PERMIT	. 25
XIII.	DEPA	RTMENT OF ENERGY/OFFICE OF FOSSIL ENERGY	. 26
XIV.	OTHE	ER RELATED APPLICATIONS	. 26
XV.	REQU	JIRED EXHIBITS	. 26
XVI.	CONC	CLUSION	. 29

UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

Corpus Christi Liquefaction Stage III, LLC Corpus Christi Liquefaction, LLC)))
Cheniere Corpus Christi Pipeline, L.P.)

Docket No. CP18-__-000

Docket No. CP18-__-000

APPLICATION FOR AUTHORIZATIONS UNDER THE NATURAL GAS ACT

Pursuant to Section 3(a) of the Natural Gas Act ("NGA"),¹ and in accordance with Parts 153 and 380 of the regulations of the Federal Energy Regulatory Commission ("Commission" or "FERC"),² Corpus Christi Liquefaction Stage III, LLC ("CCL Stage III") hereby files this application ("Application") for authorization to site, construct, and operate an expansion of the Corpus Christi Liquefaction Project approved by the Commission in FERC Docket No. CP12-507-000, which is currently under construction (the "Liquefaction Project").³ The proposed expansion of the Liquefaction Project consists of the addition of seven midscale liquefaction trains and one liquefied natural gas ("LNG") storage tank (together, the "Stage 3 LNG Facilities").

Corpus Christi Liquefaction, LLC ("CCL") is currently constructing the Liquefaction Project, and will provide interconnects between the Liquefaction Project and the Stage 3 LNG Facilities, as well as control building modifications to accommodate the Stage 3 LNG Facilities. The marine facilities and certain other support infrastructure authorized for the Liquefaction Project will be shared with the Stage 3 LNG Facilities.

¹ 15 U.S.C. § 717b(a) (2012).

² 18 C.F.R. Parts 153, 380 (2017).

³ See Corpus Christi Liquefaction, LLC & Cheniere Corpus Christi Pipeline, L.P., 149 FERC ¶ 61,283 (2014) [hereinafter Liquefaction Project Order], reh'g denied, 151 FERC ¶ 61,098 (2015).

In addition, pursuant to Section 7(c) of the NGA,⁴ and in accordance with Parts 157 and 380 of the Commission's regulations,⁵ Cheniere Corpus Christi Pipeline, L.P. ("CCPL") hereby submits this Application requesting that the Commission grant a certificate of public convenience and necessity under Part 157, Subpart A of the Commission's regulations,⁶ authorizing CCPL to construct, own, operate, and maintain new interstate natural gas pipeline, compression, and related facilities in San Patricio County, Texas (collectively the "Stage 3 Pipeline"). The Stage 3 Pipeline, which will be approximately 21-miles long and 42-inches in diameter, will originate at CCPL's Sinton Compressor Station and generally run parallel to CCPL's existing 48-inch-diameter interstate natural gas pipeline that was authorized by the Commission in Docket No. CP12-508-000 (the "Corpus Christi Pipeline")⁷ and will be capable of supplying feed gas to, and bringing natural gas from, the Stage 3 LNG Facilities. The Stage 3 Pipeline will be integrated and operated as part of the Corpus Christi Pipeline system.

The Stage 3 LNG Facilities and Stage 3 Pipeline are collectively referred to herein as the "Stage 3 Project," or "Project." CCL Stage III, CCL, and CCPL (together, the "Applicants") respectfully request that the Commission grant this Application by June 28, 2019.

In support of the Application, the Applicants state as follows:

I. INFORMATION REGARDING THE APPLICANTS

The exact legal name of CCL Stage III is Corpus Christi Liquefaction Stage III, LLC. CCL Stage III is a Delaware limited liability company. The exact legal name of CCL is Corpus Christi Liquefaction, LLC. CCL is a Delaware limited liability company. The exact legal name of CCPL

⁴ 15 U.S.C. § 717f(c).

⁵ 18 C.F.R. Parts 157, 380.

⁶ *Id.*, Part 157, Subpart A.

⁷ See Liquefaction Project Order, supra note 3.

is Cheniere Corpus Christi Pipeline, L.P. CCPL is a Delaware limited partnership. All the Applicants have primary places of business located at 700 Milam Street, Suite 1900, Houston, TX 77002, and are registered to do business in the State of Texas. The Applicants are wholly-owned subsidiaries of Cheniere Energy, Inc. (NYSE MKT: LNG), a publicly-traded corporation that is a developer of LNG terminals and natural gas pipelines on the Gulf Coast, including the Liquefaction Project and the Corpus Christi Pipeline.

II. 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:

Karri Mahmoud Joseph Moake Cheniere Energy, Inc. 700 Milam Street, Suite 1900 Houston, TX 77002 Telephone: (713) 375-5000 Email: <u>Karri.Mahmoud@cheniere.com</u> Email: <u>Joseph.Moake@cheniere.com</u> Lisa M. Tonery Mariah T. Johnston Orrick, Herrington & Sutcliffe LLP 51 West 52nd Street New York, N.Y. 10019-6142 Telephone: (212) 506-3710 Email: <u>ltonery@orrick.com</u> Email: <u>mjohnston@orrick.com</u>

III. <u>BACKGROUND</u>

On December 30, 2014, the Commission issued the Liquefaction Project Order, authorizing CCL to site, construct, and operate the Liquefaction Project.⁸ The Liquefaction Project includes three LNG "trains," three 160,000 cubic meter ("m³") LNG storage tanks, and a marine terminal with two berths capable of receiving LNG carrier vessels.⁹ CCL commenced construction of the Liquefaction Project in February 2015, and construction is ongoing.

⁸ See id. at P 3.

⁹ See id. at PP 6–7.

The Liquefaction Project Order also authorized CCPL to construct and operate the Corpus Christi Pipeline,¹⁰ and granted CCPL blanket construction and transportation authority pursuant to Part 157, Subpart F and Part 284, Subpart G of the Commission's regulations.¹¹ The Corpus Christi Pipeline runs for approximately 23 miles from the Liquefaction Project to a point near the City of Sinton, Texas, and includes a compressor station and multiple metering and regulating ("M&R") stations,¹² and is capable of transporting up to 2.25 billion cubic feet per day ("Bcf/d") of natural gas to the Liquefaction Project. The Commission issued CCPL a Notice to Proceed with construction on the pipeline on November 23, 2016,¹³ and construction commenced in January 2017. CCPL received authorization from the Commission to place the Corpus Christi Pipeline inservice on May 23, 2018.

On June 1, 2015, CCL and CCPL requested initiation of the Commission's National Environmental Policy Act ("NEPA")¹⁴ pre-filing review process for the Stage 3 Project.¹⁵ On June 9, 2015, the Director of the Commission's Office of Energy Projects issued a letter order initiating

¹³ Corpus Christi Liquefaction, LLC & Cheniere Corpus Christi Pipeline, L.P., Letter Order Granting Authorization to Construct Pipeline Facilities, Docket Nos. CP12-507-000 & CP12-508-000 (November 23, 2016).

¹⁴ 42 U.S.C. §§ 4321–4347 (2012). Due to restrictions in certain financing documents, CCL Stage III was formed for the purposes of owning and operating the Stage 3 LNG Facilities and was added as an Applicant in the proceeding.

¹⁵ Corpus Christi Liquefaction, LLC & Cheniere Corpus Christi Pipeline, L.P., Request to Initiate Pre-Filing Review Process, FERC Docket No. PF15-26-000 (June 1, 2015).

¹⁰ *See id.* at P 3.

¹¹ See id. at PP 31–32.

¹² The Liquefaction Project Order authorized CCPL to construct two compressor stations and six M&R stations along the Corpus Christi Pipeline. See id. at P 10. However, on December 23, 2015, CCPL filed a motion to vacate, in part, the authorization granted in the Liquefaction Project Order. CCPL requested that the Commission vacate its authorization to construct, own and operate the Texas Eastern Interconnect, the Texas Eastern M&R Station, and the Taft Compressor Station. See Corpus Christi Pipeline, L.P., Motion of Cheniere Corpus Christi Pipeline, L.P. to Vacate Certificate Authorization in Part, Docket No. CP12-508-000 (December 23, 2015). FERC granted the request to vacate on March 3, 2016. Cheniere Corpus Christi Pipeline, L.P., 154 FERC ¶ 61,163 (2016). On January 15, 2016, CCPL filed a Prior Notice request to add additional compression to the Sinton Compressor Station under its blanket certificate authorization granted in Docket No. CP12-508-000. See Cheniere Corpus Christi Pipeline, L.P., Request for Prior Notice Authorization Under Blanket Certificate, Docket No. CP16-59-000 (Jan. 15, 2016).

the NEPA review process in Docket No. PF15-26-000.¹⁶ On August 17, 2015, the Commission issued a Notice of Intent to Prepare an Environmental Assessment ("EA") for the Planned Stage 3 Project, and Request for Comments on Environmental Issues.¹⁷

During the pre-filing process for the Project, the Applicants participated in meetings with local, state, and federal officials, as well as individual and agency stakeholders, to identify and resolve issues of potential concern at an early juncture. The resource reports included in the Environmental Report submitted herewith as Exhibit F/F-I generally address and incorporate the comments provided by the Commission Staff and other stakeholders. The Applicants believe that, as a result of their participation in the pre-filing process, they have been able to better tailor this Application to address stakeholder concerns.

IV. EXECUTIVE SUMMARY

CCL Stage III is seeking authorization pursuant to Section 3(a) of the NGA to site, construct, and operate LNG export facilities adjacent to the site of the Liquefaction Project, which is currently under construction in San Patricio and Nueces Counties, Texas. The Stage 3 LNG Facilities include seven midscale liquefaction trains—and associated facilities—with a maximum estimated liquefaction capacity of approximately 11.45 million tonnes per annum ("MTPA"). The Stage 3 LNG Facilities will also include one 160,000 m³ LNG storage tank, and are anticipated to increase maximum LNG carrier vessel traffic from the currently-authorized 300 vessels per year associated with the Liquefaction Project, to a maximum of 400 vessels per year.

¹⁶ Cheniere Corpus Christi Liquefaction, LLC & Cheniere Corpus Christi Pipeline, L.P., Approval of Pre-Filing Request, FERC Docket No. PF15-26-000 (June 9, 2015).

¹⁷ Corpus Christi Liquefaction, LLC & Cheniere Corpus Christi Pipeline, L.P., Notice of Intent to Prepare an Environmental Assessment for the Planned Stage 3 Project, and Request for Comments on Environmental Issues, FERC Docket No. PF15-26-000 (August 17, 2015).

CCPL is seeking authorization pursuant to Section 7(c) of the NGA to construct, own, operate and maintain the Stage 3 Pipeline, comprised of approximately 21 miles of new 42-inchdiameter pipeline, 44,000 horsepower ("hp") of additional compression, and associated appurtenant facilities. The Stage 3 Pipeline will originate at the existing Sinton Compressor Station, generally run parallel to the Corpus Christi Pipeline, and terminate at the Stage 3 LNG Facilities. The Stage 3 Pipeline will be capable of transporting an average of 1.5 Bcf/d of natural gas to the Stage 3 LNG Facilities—as well as transporting natural gas from the Stage 3 LNG Facilities to interconnections with existing natural gas pipeline systems.

The Environmental Report, submitted herewith as Exhibit F/F-I, fully demonstrates that the Stage 3 Project will not have significant environmental impacts. Construction of the Stage 3 LNG Facilities will occur mostly on land that will already have been impacted by construction of the Liquefaction Project or other previous industrial activities. Moreover, the Stage 3 Pipeline generally will parallel the Corpus Christi Pipeline for almost the entirety of its length.

The Stage 3 Project presents numerous benefits to the public, including stimulation of the local and regional economies through job creation and increased economic activity, as well as the expansion of market outlets and access for U.S. natural gas producers. As such, CCL Stage III submits that the NGA Section 3 authorization sought herein is not inconsistent with the public interest. Indeed, the Commission has previously found the Liquefaction Project to meet the public-interest standard.¹⁸

¹⁸ See Liquefaction Project Order, supra note 3, at P 3. Similarly, in granting the request of CCL and its affiliate Cheniere Marketing, LLC ("CMI") for authorization to export LNG from the Liquefaction Project to countries with which no free trade agreement ("FTA") providing for national treatment in natural gas is in place ("Non-FTA Nations"), the U.S. Department of Energy's Office of Fossil Energy ("DOE/FE") has already made a favorable public interest determination in the case of LNG exports from the Liquefaction Project. That determination was made on the basis of the very robust market studies and other evidence and comments submitted in that proceeding demonstrating the substantial economic and public benefits that are likely to follow from exports of natural gas as LNG. See Cheniere Marketing, LLC & Corpus Christi Liquefaction, LLC, Final Opinion and Order Granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas by

The Stage 3 Pipeline satisfies the Commission's policy goals established in its *Certification* of New Interstate Natural Gas Pipeline Facilities¹⁹ addressing the construction of new interstate natural gas pipeline facilities. The Stage 3 Pipeline will not rely on or require any subsidies from existing customers. CCPL currently has one firm customer, CCL, with which it has entered into a firm transportation service agreement for transportation service on the Corpus Christi Pipeline. In accordance with Commission policy, CCPL will conduct an open season for the additional firm transportation capacity made available by the Stage 3 Pipeline by no later than the fourth quarter of 2018 ("Open Season") and will then submit the Open Season results to the Commission. Moreover, the Stage 3 Pipeline will have no adverse impact on existing pipelines or their customers because it will provide crucial incremental feed gas delivery capacity to support the Stage 3 LNG Facilities, and therefore will not displace existing service providers.

For the foregoing reasons, and as demonstrated fully herein, the Stage 3 Project satisfies the requirements of NGA Sections 3(a) and 7(c). Accordingly, the Applicants request that the Commission grant all authorizations required to site, construct, own, operate and maintain the Stage 3 Project as proposed herein by June 28, 2019.

Authorization by the date requested is required so that CCL Stage III may commence construction of the Stage 3 Project in the 3rd Quarter of 2019, and commence export service as anticipated, by 2022.²⁰

Vessel from the Proposed Corpus Christi Liquefaction Project to Be Located in Corpus Christi, Texas, to Non-Free Trade Agreement Nations, DOE/FE Order No. 3638, FE Docket No. 12-97-LNG (May 12, 2015) [hereinafter Non-FTA Order].

¹⁹ Statement of Policy: Certification of New Interstate Natural Gas Pipeline Facilities, 88 FERC ¶ 61,227 (1999); see also Order Clarifying Statement of Policy, 90 FERC ¶ 61,128 (2000); Order Further Clarifying Statement of Policy, 92 FERC ¶ 61,094 (2000). These three FERC orders are collectively referred to herein as the Commission's "Certificate Policy Statement."

²⁰ Construction of the Stage 3 Pipeline is anticipated to begin in 2020, and to be completed within approximately a year.

V. DETAILED PROJECT DESCRIPTION

A. Stage 3 LNG Facilities

The Stage 3 LNG Facilities will be located largely within Dredged Material Placement Area 2, which has been authorized by the Commission for use by the Liquefaction Project for dredge material placement. The Stage 3 LNG Facilities include the following major components, each of which is described below: seven midscale liquefaction trains, an LNG storage tank, and other supporting infrastructure.

1. Liquefaction Facilities

The Stage 3 LNG Facilities will include seven midscale liquefaction trains each with a nameplate LNG production capacity²¹ of 1.36 MTPA and a maximum capacity of approximately 1.64 MTPA. Each liquefaction train will consist of two liquefaction units with a Nameplate Capacity of 0.681 MTPA and a maximum capacity of approximately 0.82 MTPA. The Project will have the capacity to produce approximately 11.45 MTPA of LNG for export. Each liquefaction train will contain the following equipment:

- Facilities to remove carbon dioxide ("CO2"), hydrogen sulfide ("H2S") and other sulfur compounds from the feed gas;
- Facilities to remove water and mercury from the feed gas;
- Facilities to remove heavy hydrocarbons from the feed gas;
- A thermal oxidizer for combusting waste gas;
- Electric motor driven refrigerant compressors and associated cold boxes;
- Induced draft air coolers;
- Associated fire and gas and safety systems; and
- Associated control systems and electrical infrastructure.

²¹ "Nameplate Capacity" is a rating that conservatively accounts for fuel, planned and unplanned shutdowns, production variations due to temperature and other conditions, LNG composition changes, boil-off, equipment aging, shipping constraints, and other factors for a calendar year, averaged over a 30-year operating cycle.

2. LNG Storage Tank

LNG will be stored in one 160,000 m³ full-containment tank. The LNG storage tank will be designed to store the LNG at a temperature range of -260 Fahrenheit ("°F") to -270°F and with a normal operating pressure of 1.5 pounds per square inch gauge ("psig") to a maximum internal pressure of 4.2 psig. The tank system will meet the requirements of National Fire Protection Association ("NFPA") 59A, 49 C.F.R. Part 193, and American Petroleum Institute Standard 620,

Appendix Q. The major components of the tank will consist of:

- A 9 percent nickel steel inner container, designed to withstand the hydrostatic pressures and cryogenic temperatures of the LNG, as well as the predicted seismic, insulation, and thermal gradient loads. The space between the inner container and the outer container will be insulated with expanded perlite to maintain the outer container at near ambient temperature. The insulation beneath the inner container will be cellular glass load-bearing insulation that will support the weight of the inner container and the LNG.
- An outer tank comprised of reinforced concrete with a domed concrete roof. The outer tank is designed for the following conditions:
 - The specified maximum internal pressure of 4.2 psig;
 - Sustained wind velocity of 150 miles per hour without the loss of structural or functional integrity in accordance with 49 CFR § 193.2067;
 - Seismic loads in accordance with NFPA 59A and the site-specific seismic reports;
 - o Internal pressure imposed by insulation loads; and
 - Roof and platform dead loads.
- An insulated aluminum deck over the inner container, suspended from the roof. The aluminum support deck will be insulated with fiberglass blankets so that the outer tank roof and vapor space above the suspended deck are essentially at ambient temperature. The vapor pressure from the LNG will be equalized through ports in the suspended deck and will be contained by the outer container.

The LNG storage tank will be supported on a reinforced concrete foundation. The tank will

be 258 feet in diameter and a total of 225 feet high from the foundation base to the top of the jib

crane. Electric base heating will be installed in the concrete foundation to prevent frost heave.

Five in-tank pump well columns will be installed in the tank. Four pump well columns will be

fully installed with foot valve, electrical, supports, instrumentation, piping, etc., for a complete system. The fifth pump well column will be equipped with a foot valve only for a future spare pump. All LNG piping will enter the tank through the concrete tank roof. All piping systems will be in accordance with American Society of Mechanical Engineers B31.3 and NFPA 59A, Chapter 6. The tank will also be provided with the following accessories:

- A cool-down temperature-detection system to monitor the inner tank bottom plate and inner tank shell continuously during cool-down procedures;
- Foundation temperature sensors located at strategic locations under the tank;
- Instrumentation to monitor the quality and level of LNG in the tank, and to monitor tank contents for stratification;
- A safety-rated control system to monitor the LNG level and control the fill line shutoff valves;
- Pressure and vacuum relief systems;
- Platforms, elevators, and stairways with intermediate landings attached to the outer tank;
- Spill protection of the tank roof over the edge of the roof dome;
- Lighting and aircraft warning lights;
- Electrical grounding system;
- A settlement monitoring system to measure and record inner and outer container movements during construction, hydrostatic testing, and operation; and
- Seismic monitors.

Per 49 CFR Part 193, full containment tanks do not require additional spill containment. However,

in compliance with the FERC requirement that any potential LNG spill must be contained within

the facility's property limits, a tertiary containment system will be provided. The tertiary

containment system will be primarily defined by the roads that encircle the seven trains and the

LNG Storage Tank.

3. Supporting Infrastructure

In addition, the Stage 3 LNG Facilities will include the following supporting infrastructure:

- Expansion of the Liquefaction Project control building to accommodate the Stage 3 LNG Facilities;
- Miscellaneous buildings and other structures to accommodate employees, equipment, utilities and support services infrastructure;
- Remote input/output buildings and substations;
- Spill containment facilities;
- Emergency shutdown systems;
- Firewater system, including diesel and electric driven pumps and storage tank;
- Three wet flares (approximately 197 feet high each);
- Three dry flares (approximately 197 feet high each);
- Three ground flares (approximately 50 feet high each);
- Instrument air compressor packages;
- Security and perimeter control systems;
- Telecoms, information technology, closed circuit television and other systems;
- Potable water, utility water, and demineralized water systems;
- Pipeline gas compressor;
- Pipeline interconnects for the receipt of natural gas from the CCL Terminal Custody Meter Station as well as transfer of LNG to the CCL marine facilities;
- Electric facilities, switchgear, transformers, and other electrical accessories;
- LNG transfer line to Liquefaction Project storage tanks; and
- Various interconnects to the Liquefaction Project.

A communications tower is not proposed as part of the Stage 3 LNG Facilities, nor will any new marine facilities be required for the Stage 3 LNG Facilities, although—as noted above—the Stage 3 LNG Facilities are anticipated to increase maximum LNG carrier vessel traffic by approximately 100 vessels per year. CCL Stage III and CCL have prepared a follow-on Waterway Suitability Assessment and submitted it to the U.S. Coast Guard to obtain a Letter of Recommendation confirming that the increase will not significantly impact the waterway. Receipt of a Letter of Recommendation is anticipated in 3rd Quarter 2018.

B. Stage 3 Pipeline

The Stage 3 Pipeline will be capable of transporting an average of approximately 1.5 Bcf/d of natural gas to the Stage 3 LNG Facilities, as well as transporting natural gas from the Stage 3 LNG Facilities to interconnections with existing natural gas pipeline systems. The Stage 3 Pipeline will be located entirely within San Patricio County, Texas, and will consist of: (1) approximately 21 miles of 42-inch-diameter pipeline; (2) 44,000 hp of additional compression; (3) M&R stations; (4) appurtenant facilities, including metering, pressure regulation, and filter separation facilities; (5) launcher/receiver facilities at both ends of the 21-mile pipeline; and (6) mainline valve ("MLV") facilities. The major components of the Stage 3 Pipeline are described below:

1. Pipeline

CCPL will construct approximately 21 miles of new 42-inch-diameter bi-directional pipeline that will originate at the Sinton Compressor Station, run parallel to the Corpus Christi Pipeline for almost its entire length (although the mileposts ["MPs"] for the Stage 3 Pipeline will run in the opposite direction), and terminate at the Stage 3 LNG Facilities. The pipeline will have a permanent right-of-way width of 50 feet that will overlap by 25 feet with the 48-inch-diameter Corpus Christi Pipeline right-of-way ("ROW"). The pipeline will be designed for a maximum allowable operating pressure of 1,440 psig, and a capacity of approximately 1.5 Bcf/d. The pipeline will be capable of transporting natural gas to the Stage 3 LNG Facilities as well as transporting natural gas from the Stage 3 LNG Facilities to interconnections with existing pipeline systems.

2. Sinton Compressor Station

The Sinton Compressor Station was authorized and constructed as part of the Corpus Christi Pipeline,²² and will be located at approximately MP 21.0 of the Stage 3 Pipeline.²³ The Stage 3 Pipeline will require additional compression at the Sinton Compressor Station, namely the addition of approximately 44,000 hp via two Titan 130E gas-fired compressor units. The Sinton Compressor Station, including the facilities to be added for the Stage 3 Pipeline, will be operated remotely.

3. Metering and Regulating Stations

One M&R station will be installed within the Stage 3 LNG Facilities (at MP 0.0) and two 750 MMcf/d M&R stations will be installed within the Sinton Compressor Station. The sources of gas for the two M&R stations at the Sinton Compressor Station are currently unknown and will be determined later in the project development process. The M&R stations will be remotely operated and consist of the following facilities:

- M&R facilities;
- Filter separators;
- Liquid handling tanks;
- Remote Terminal Unit & Gas chromatograph buildings;
- Pressure/flow control; and
- Over pressure protection.

4. Launcher/Receiver Facilities

CCPL will construct and operate permanent pig launcher/receiver facilities at each end of the Stage 3 Pipeline. The launcher will be sited at the origin of the Stage 3 Pipeline (Sinton

²² See Liquefaction Project Order, supra note 3, at P 10.

²³ See supra note 12.

Compressor Station), within the Sinton Compressor Station boundaries. The receiver will be sited with the Stage 3 LNG Facilities M&R station.

5. Mainline Valve Facilities

MLVs will be sited at the inception and terminus of the pipeline, at MP 0.0 and MP 21.0, respectively. These MLVs will be located within the M&R stations at either end of the Stage 3 Pipeline and therefore no additional workspace will be required. Additionally, two MLVs will be located along the pipeline route, one at MP 7.3 and the other at MP 12.8. The MLVs at MP 7.3 and MP 12.8 will be located within the permanent easement of the Stage 3 Pipeline and therefore no additional workspace will be required for construction. The area required for operation of each of the MLVs (at MP 7.3 and 12.8) is 0.5-acre. The 0.5-acre operational areas will fall entirely within the permanent pipeline easement.

VI. MARKET DEMAND

There is adequate global market demand to support construction of the Stage 3 Project, which is motivated by anticipated growth in domestic natural gas production in the Gulf Coast region and elsewhere in the United States.²⁴ The inability of U.S. residential, commercial, industrial, and electric consumers to increase consumption quickly enough to offset growth in production has contributed to projections for sustained low prices for natural gas in the United States. Rapid growth in U.S. natural gas production, reserves and recoverable resources have driven wellhead prices to historically low levels, resulting in decreased investment by the natural gas industry and reductions in associated economic activity, landowner royalties, taxes and fee income.

²⁴ Domestic wellhead natural gas gross withdrawals in 2017 totaled over 33.17 trillion standard cubic feet, the highest in U.S. history. *See* U.S. Energy Info. Admin., Natural Gas Gross Withdrawals and Production, <u>http://www.eia.gov/dnav/ng/ng_prod_sum_dcu_NUS_a.htm</u> (last updated April 30, 2018).

Against this backdrop, CCL has entered into numerous LNG sale-and-purchase agreements for volumes from the Liquefaction Project.²⁵ Both CCL and CCL Stage III are engaged in ongoing discussions concerning other commercial arrangements regarding the sale of LNG for export from the Liquefaction Project and the Stage 3 Project, respectively.

As noted above, in compliance with Commission policy, CCPL intends to conduct an Open Season for the additional firm transportation capacity made available by the Stage 3 Pipeline by no later than the fourth quarter of 2018, and will submit the results to the Commission.

VII. ENVIRONMENTAL COMPLIANCE

As demonstrated by the Environmental Report submitted herewith as Exhibit F/F-I, the environmental impacts of the Stage 3 Project will be minimal, and any potential adverse impacts will be avoided or adequately mitigated. Construction of the Stage 3 LNG Facilities will require approximately 1,009 acres of land and operation will require approximately 239 acres of land. Of these approximately 1,248 acres, 1,235 acres (99 percent) are permitted for impacts associated with construction and operation of the Liquefaction Project.

Construction and operation of the Stage 3 Pipeline will require approximately 481 acres and approximately 171 acres of land, respectively. The Stage 3 Pipeline will generally parallel the Corpus Christi Pipeline, and will only require .3 acres of new access roads for construction, utilizing 18.5 acres used for the Corpus Christi Pipeline. For operation of the Stage 3 Pipeline, 12.7 acres of access roads will be shared with the Corpus Christi Pipeline, and approximately 0.3 acres of new access roads will be required. The Stage 3 Pipeline will be constructed utilizing a

²⁵ See Cheniere Energy, Inc., Corpus Christi LNG, Liquefaction Facilities: Trains 1-3 (last updated June 20, 2016), available at <u>http://www.cheniere.com/terminals/corpus-christi-project/liquefactions-facilities-trains-1-3/</u>.

120-foot-wide construction ROW and a permanent ROW width of 50 feet that will overlap by 25 feet with the Corpus Christi Pipeline ROW.

The Commission has extensively analyzed the environmental impacts of the Liquefaction Project, and the Corpus Christi Pipeline under NEPA.²⁶ The Applicants respectfully submit that the Environmental Report demonstrates that all environmental impacts from the addition of the Stage 3 Project are fully addressed, and that the EA the Commission intends to prepare will be sufficient to comply with the analysis requirements of NEPA.²⁷

VIII.

THE AUTHORIZATIONS REQUESTED ARE CONSISTENT WITH THE PUBLIC INTEREST AND ARE REQUIRED BY THE PUBLIC CONVENIENCE AND NECESSITY

A. The Stage 3 LNG Facilities Are 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 opportunity for hearing, it finds that the proposed exportation or importation will not be consistent with the public interest."²⁸ Section 153.7(c) of the Commission's regulations implementing Section 3(a) of the NGA requires a showing that the Project "is not inconsistent with the public interest."²⁹ In approving the Liquefaction Project, the Commission noted that it considers the scope of its review to be "'limited to consideration of the

²⁶ See FERC, Final Environmental Impact Statement for the Corpus Christi LNG Project, Corpus Christi Liquefaction, LLC & Cheniere Corpus Christi Pipeline, L.P., FERC Docket Nos. CP12-507-000 & CP12-508-000, FE Docket No. 12-97-LNG (Oct. 8, 2014).

²⁷ See 42 U.S.C. § 4332; cf. 80 Fed. Reg. 50,843 (Aug. 21, 2015) (publishing Notice of Intent to prepare an EA for the Stage 3 Project).

²⁸ 15 U.S.C. § 717b(a).

²⁹ 18 C.F.R. § 153.7(c).

place of importation [or exportation], which necessarily includes the technical and environmental aspects of any related facilities."³⁰

Both the Commission and DOE/FE have already made multiple findings that the Liquefaction Project is in the public interest.³¹ In granting CCL and CMI authorization to export LNG in an amount of up to the equivalent of 2.1 Bcf/d of natural gas from the Liquefaction Project to Non-FTA Nations, DOE/FE found that there was substantial evidence of economic and public benefits, such that the authorization was not inconsistent with the public interest.³² Among other things, DOE/FE found that the Liquefaction Project would benefit the local, regional, and national economies,³³ and that "[a]n efficient, transparent international market for natural gas with diverse sources of supply provides both economic and strategic benefits to the United States and our allies."³⁴ DOE/FE also noted that its May 2014 *Life Cycle Greenhouse Gas Perspective on Exporting Liquefied Natural Gas from the United States*³⁵ had found that, "for most scenarios in both the European and Asian regions, the generation of power from imported natural gas has lower life cycle [greenhouse gas] emissions than power generation from regional coal," such that, "to the extent U.S. LNG exports are preferred over coal in LNG-importing nations, U.S. LNG exports are likely to reduce global [greenhouse gas] emissions,"³⁶

³⁰ See Liquefaction Project Order, supra note 3, at P 20, n.31 (quoting Nat'l Steel Corp., 45 FERC ¶ 61,100, 61,332-33 (1988)).

³¹ See supra notes 3 and 18.

³² See Non-FTA Order, supra note 18, at 183–91.

³³ See id. at 186–90.

³⁴ *Id.* at 191.

³⁵ U.S. Dep't of Energy, Nat'l. Energy Tech. Lab., Life Cycle Greenhouse Gas Perspective on Exporting Liquefied Natural Gas from the United States (May 29, 2014), available at http://energy.gov/sites/prod/files/2014/05/f16/Life%20Cycle%20GHG%20Perspective%20Report.pdf.

³⁶ *Non-FTA Order, supra* note 18, at 165, 202.

Similarly, the Commission found that the Liquefaction Project would not be inconsistent with the public interest.³⁷ Among other things, it found that environmental impacts would "be reduced to less-than-significant levels," also pointing out that the "benefits the [Corpus Christi] Pipeline [would] provide" outweighed "minimal adverse impacts on existing customers, other pipelines and their customers, and landowners and surrounding communities."³⁸

As with the Liquefaction Project, the Stage 3 Project is not inconsistent with the public interest. It is proposed as a result of the growth in domestic natural gas production in the U.S. Long-term projections confirm that domestic natural gas production is projected to increase significantly in the foreseeable future.³⁹ The U.S. Energy Information Administration's ("EIA") April 2018 Short-Term Energy Outlook forecasts that natural gas production will "average 81.1 Bcf/d in 2018, establishing a new record."⁴⁰ The EIA's 2018 Annual Energy Outlook ("AEO") reference case projects that by 2050 natural gas production will account for nearly 39% of all U.S. energy production.⁴¹ Furthermore, the 2018 AEO projects that such production increases will "support[] higher levels of domestic consumption and natural gas exports."⁴²

The Stage 3 Project will significantly benefit the U.S. economy. A 2014 EIA study conducted at the request of DOE concluded that "[i]ncreasing LNG exports leads to higher economic output, as measured by real gross domestic product (GDP), as increased energy

³⁷ *Liquefaction Project Order, supra* note 3, at P 3.

³⁸ *Id.*

³⁹ Letter from Jack N. Gerard, Pres. and Chief Exec. Officer, Am. Petroleum Inst., to Rick Perry, Sec. of Energy, (Mar. 14, 2017), available at <u>http://www.api.org/~/media/Files/News/Letters-Comments/2017/3-14-17-Ltr-to-DOE-Secretary-Perry-LNG-Exports-Authorization.pdf</u>.

⁴⁰ EIA, Short Term Energy Outlook April 2018 (April 2018), available at <u>https://www.eia.gov/outlooks/steo/pdf/steo_full.pdf</u>.

⁴¹ EIA, Annual Energy Outlook 2018 With Projections to 2050 at 20 (Feb. 6, 2018), available at https://www.eia.gov/outlooks/aeo/pdf/AEO2018.pdf.

⁴² *Id* at 59.

production spurs investment."⁴³ In addition, the proposed Project will promote stability in domestic natural gas pricing, promote liberalization of global natural gas trade, advance national security and the security of U.S. allies, and increase economic trade and ties with foreign nations.

As discussed in Section VI, above, market response to the Liquefaction Project has been positive, and the additional liquefaction capacity that will result from the Stage 3 Project will enable CCL Stage III to meet additional demand for LNG exports. As discussed in Exhibit F/F-I (Environmental Report), Resource Reports 1 and 5, submitted herewith, the local and regional economies will benefit from the Stage 3 Project through job creation and increased economic activity and tax revenues, as well as the expansion of market outlets and access for U.S. natural gas producers. This will include the direct creation of up to approximately 1,200 jobs during peak construction of the Stage 3 Project, and 246 permanent jobs during its operation.

B. The Stage 3 Pipeline Is Consistent with the Public Convenience and Necessity, and with the Commission's *Certificate Policy Statement*

Section 7(c) of the NGA prohibits any natural gas company from engaging in the transportation or sale of natural gas, or from constructing, extending, acquiring, or operating facilities therefor, without first obtaining a certificate of public convenience and necessity from the Commission.⁴⁴ Such a certificate "shall be issued … if it is found that … the proposed service, sale, operation, construction, extension, or acquisition … is or will be required by the present or future public convenience and necessity …"⁴⁵ The Commission's regulations require an NGA Section 7(c) applicant to "set forth … [t]he facts relied upon" for this showing.⁴⁶

⁴³ EIA, *Effect of Increased Levels of Liquefied Natural Gas Exports on U.S. Energy Markets*, at 24 (October 2014), *available at <u>https://www.eia.gov/analysis/requests/fe/pdf/lng.pdf</u>.*

⁴⁴ 15 U.S.C. § 717f(c)(1)(A).

⁴⁵ *Id.* § 717f(e).

⁴⁶ 18 C.F.R. § 157.6(b)(2).

In order to provide applicants with guidance on how the Commission will evaluate proposals for construction of new interstate natural gas pipeline facilities, the Commission issued its *Certificate Policy Statement*,⁴⁷ which requires an applicant to show that: (1) its proposed project will not rely on subsidies from existing customers; (2) it has made efforts to eliminate or minimize any adverse effects the project may have on existing customers, competing pipelines, and its captive customers; and (3) it has made efforts to eliminate or minimize any adverse effects the project soft landowners and surrounding communities.⁴⁸ The Commission is to evaluate a proposed project by balancing the likely public benefit against the adverse impacts associated with the project.⁴⁹

The Stage 3 Pipeline satisfies the policy goals set forth in the *Certificate Policy Statement*, and therefore is consistent with the public convenience and necessity. The Commission has determined that "where a pipeline proposes to charge incremental rates for new construction that are higher than the company's existing system rates, the pipeline satisfies the threshold requirement that the project will not be subsidized by existing shippers."⁵⁰ As noted below, CCPL is proposing an incremental recourse reservation rate of \$3.8004/ Dekatherm ("Dth") to recover the costs of the Stage 3 Pipeline that is higher than CCPL's existing system-wide rate of \$2.8172/Dth. Accordingly, the Stage 3 Pipeline will not rely on or require any subsidies from existing customers, nor will it adversely affect them. Therefore the Stage 3 Pipeline meets the threshold requirement established by the Commission's *Certificate Policy Statement*. Moreover, the Stage 3 Pipeline is proposed to meet the natural gas supply transportation requirements of the

⁴⁷ See supra, note 19.

⁴⁸ See Certification of New Interstate Natural Gas Pipeline Facilities, 88 FERC ¶ 61,227, 61,745–48 (1999).

⁴⁹ See id. at 61,748–50.

⁵⁰ See e.g., Gulf South Pipeline Company, LP, 163 FERC ¶ 61,124, P12 (2018).

Stage 3 LNG Facilities. As such, it is not designed to bypass an existing pipeline or to provide service already provided by another pipeline. Finally, the Stage 3 Pipeline will largely parallel the Corpus Christi Pipeline, thereby minimizing construction impacts and other adverse effects to nearby landowners and communities. This parallel configuration was determined to be the most environmentally and economically efficient means of constructing the additional pipeline capacity required to provide feed gas to the Stage 3 LNG Facilities.

For these reasons—and as discussed in further detail in Section IX, below—the Stage 3 Pipeline is required by the public convenience and necessity.

IX. ADDITIONAL INFORMATION WITH RESPECT TO THE STAGE 3 PIPELINE

A. Open Season

As stated, CCPL intends to conduct an Open Season by no later than the fourth quarter of 2018 for the purpose of obtaining expressions of interest from potential customers wishing to contract for the pipeline transportation capacity that would result from construction and operation of the Stage 3 Pipeline. The Open Season, which will be preceded by a Notice of Open Season that CCPL will post on its website prior to the start of the Open Season, will be conducted in an open, transparent, and nondiscriminatory manner. CCPL will inform the Commission of the outcome of its Open Season following its completion.

B. Proposed Services

As noted above, the Stage 3 Pipeline will be integrated and operated as part of the Corpus Christi Pipeline system. CCPL intends to offer transportation services on the Stage 3 Pipeline using existing Rate Schedule FTS and Rate Schedule ITS as set forth in CCPL's currently effective

21

FERC Gas Tariff.⁵¹ CCPL will offer firm and interruptible transportation services on a selfimplementing, non-discriminatory, open access basis, consistent with the Commission's policies and CCPL's Tariff.

C. Cost and Financing

CCPL estimates that the total cost of constructing the Stage 3 Pipeline will be approximately \$312,533,049, comprised of approximately \$147,440,204 for pipeline facilities, \$95,000,000 for compression facilities, and \$35,000,000 for M&R facilities (inclusive of Allowance for Funds Used During Construction). This cost estimate is detailed in Pipeline Exhibit K, submitted herewith.

CCPL expects to finance the Stage 3 Pipeline as set forth in Pipeline Exhibit L, submitted herewith.

D. Rates and Tariff

CCPL intends that its approved Tariff provisions will govern service on the Stage 3 Pipeline. CCPL is proposing incremental, initial recourse rates for transportation service on the Stage 3 Pipeline, as detailed in Pipeline Exhibit P. CCPL has developed the proposed recourse rates in a manner consistent with the Commission's policy related to the straight-fixed-variable rate design. CCPL has designed the rates for Rate Schedule ITS and authorized overrun rate service based on a 100% load factor derivative of the Rate Schedule FTS reservation and usage rates, an approach that is consistent with general Commission policy.⁵²

⁵¹ *Cheniere Corpus Christi Pipeline, L.P.*, Letter Order Accepting Baseline Filing, Docket No. RP18-789-000 (May 25, 2018).

⁵² Sabine Pass Liquefaction Expansion, LLC et al., 151 FERC ¶ 61,012, at P 18 (2015); Cameron LNG, LLC & Cameron Interstate Pipeline LLC, 147 FERC ¶ 61,230, at P 15 (2014); Kinder Morgan II. Pipeline, LLC & Nat.Gas Pipeline Co. of America, 120 FERC ¶ 61,050, at PP 45-46 (2007).

In accordance with Rate Schedule FTS of its Tariff, CCPL proposes a reservation charge of \$3.8004/Dth and an authorized overrun charge of \$\$0.1249/Dth. In accordance with Rate Schedule ITS of its Tariff, CCPL proposes a charge of \$0.1249/Dth. The calculation of the initial rates for service on the Stage 3 Pipeline is detailed in the Derivation of Rates section of Pipeline Exhibit N, submitted herewith.

The incremental cost of service of \$69,975,132 has been calculated taking into account the capital cost of the Stage 3 Pipeline, operations and maintenance expenses, taxes, depreciation, and rate of return. The major factors underlying the proposed incremental recourse rates are:

- Capital Structure 50% Debt / 50% Equity
- Cost of Debt 7.75%
- Return on Equity 14.00%
- Depreciation Rate 4.00%

CCPL's proposed return on equity and debt result in an overall rate of return of 10.88%. This capital structure is in line with what has been approved by the Commission for other new pipeline projects.⁵³

A credit of \$200,000 has been applied to the total cost of service in order to allocate costs to interruptible transportation services. The Commission has previously recognized that a credit to the cost of service has the same effect as allocating costs to such services.⁵⁴

⁵³ Rover Pipeline LLC et al., 158 FERC ¶ 61,109, at P 76 (2017) citing Florida Southeast Connection et al., 156 FERC ¶ 61,160, at P 25 (2016) (noting the Commission's approval of 14 percent return on equity for greenfield pipelines based on a capital structure that contains no more than 50 percent equity).

See e.g., Millennium Pipeline Company, L.L.C., 157 FERC ¶ 61,096, at P 35 (2016); ETC Tiger Pipeline, LLC, 131 FERC ¶ 61,010, at P 27 (2010); Midcontinent Express Pipeline LLC & Enogex Inc., 124 FERC ¶ 61,089, at P 93 (2008), as amended, 126 FERC ¶ 61,271 (2009).

Under the Commission's *Certificate Policy Statement*, "[w]hen a pipeline proposes to charge a cost-based incremental rate ... higher than its existing generally applicable rates, the Commission usually approves the proposal."⁵⁵ Such an incremental rate satisfies the *Certificate Policy Statement*'s threshold requirement that a new project not rely on subsidization from existing customers.⁵⁶ As noted above, CCPL's proposed incremental initial rate for the Stage 3 Pipeline satisfies this requirement because the cost-based incremental rate is higher than its existing generally applicable rate.

Where the project results in an increase in fuel costs, the Commission requires an incremental fuel rate be established.⁵⁷ The currently effective retainage percentage is 0.50%. Accordingly, CCPL is proposing for the Stage 3 Pipeline an incremental fuel retainage percentage of 0.70%. CCPL will continue to adjust its fuel retainage percentage semi-annually to better align fuel usage and retainage, to ensure that CCPL does not over-recover fuel reimbursement from its customers.

X. <u>CERTIFICATION</u>

The Applicants hereby state that they are willing and able to do the acts for which application is herein made, and—in so doing—to conform to the provisions of the NGA and the Commission's regulations promulgated thereunder. A verification is submitted with this Application.

⁵⁵ Certification of New Interstate Natural Gas Pipeline Facilities, 88 FERC ¶ 61,227, 61,744 (1999); see, e.g., Transcontinental Pipe Line Co., LLC, 143 FERC ¶ 61,132, at P 9 (2013); Tenn. Gas Pipeline Co., 131 FERC ¶ 61,140, at P 17 (2010).

See, e.g., Dominion Transmission, Inc., 141 FERC ¶ 61,240, at P 18 (2012) ("DTI proposes to recover the costs of the Allegheny Storage Project facilities through a new incremental rate for service which is higher than DTI's existing system-wide rate. Use of an incremental rate . . . ensures that existing customers that do not use the facilities will not subsidize the expansion.").

⁵⁷ See e.g., Texas Eastern Transmission, LP, 155 FERC ¶ 61,195 at P. 8 (2016).

Pursuant to the Natural Gas Pipeline Safety Act of 1968, as amended,⁵⁸ the Applicants certify that the facilities proposed herein will be designed, constructed, tested, operated, replaced, and maintained in accordance with the requirements of Title 49, Part 192 of the Code of Federal Regulations, or any superseding state or federal safety code that is applicable to natural gas transportation pipelines. In addition, all construction and restoration activities will be performed in accordance with the environmental plans, procedures, and guidelines included in the Environmental Report in Exhibit F/F-I, submitted herewith.

XI. WAIVER OF HEARING

The Applicants submit that this Application may be granted based upon this submission and without a trial-type evidentiary hearing. In accordance with Rule 801 of the Commission's Rules of Practice and Procedure,⁵⁹ the Applicants waive their right to an oral hearing in these proceedings.

XII. <u>PRESIDENTIAL PERMIT</u>

The Stage 3 Project will not involve any facilities at the border of the United States and either Canada or Mexico, and will not otherwise involve any physical connection between the United States and a foreign country. Therefore, neither Section 153.15(a) of the Commission's regulations⁶⁰ nor Executive Order 10485⁶¹ requires the Applicants to apply for a Presidential Permit.⁶²

⁵⁸ 49 U.S.C. §§ 60101–60140 (2012).

⁵⁹ 18 C.F.R. § 385.801.

⁶⁰ *Id.* § 153.15(a).

⁶¹ Exec. Order 10485, 18 Fed. Reg. 5397 (Sept. 3, 1953).

⁶² See EcoElectrica, L.P., 75 FERC ¶ 61,157, 61,518 n.13 (1996).

XIII. DEPARTMENT OF ENERGY/OFFICE OF FOSSIL ENERGY

As required by Section 153.6 of the Commission's regulations,⁶³ CCL Stage III states that

authorization from DOE/FE under Section 3 of the NGA is required for the exportation of LNG.

CCL Stage III is submitting an application to DOE/FE for authorization to export LNG from the

Stage 3 LNG Facilities as described herein.

XIV. OTHER RELATED APPLICATIONS

There are no other related applications that must be considered in conjunction with this

Application, except as noted in Section XIII, above.

XV. <u>REQUIRED EXHIBITS</u>

<u>Terminal Exhibit A</u> § 153.8(a)(1)	Certificates of Formation and LLC Agreements Certified copies of Corpus Christi Liquefaction Stage III, LLC's and Corpus Christi Liquefaction, LLC's Certificates of Formation and LLC Agreements are submitted herewith.
Terminal Exhibit B § 153.8(a)(2)	Detailed Statement of Financial and Corporate Relationships An explanation of the financial and corporate relationships for Corpus Christi Liquefaction Stage III, LLC and Corpus Christi Liquefaction, LLC are submitted herewith.
<u>Terminal Exhibit C</u> § 153.8(a)(3)	Statement Regarding Authorized Powers An Opinion of Counsel regarding authorized powers is submitted herewith.
Terminal Exhibit D § 153.8(a)(4)	Agreement for Border Interconnections Omitted. Not applicable.
<u>Terminal Exhibit E</u> § 153.8(a)(5)	Evidence of Appropriate and Qualified Concern, Including Detailed Engineering and Design Information Omitted. Please refer to Resource Report 13 in Exhibit F/F-I (Environmental Report), submitted separately herewith.

⁶³ 18 C.F.R. § 153.6.

<u>Terminal Exhibit E-1</u> § 153.8(a)(6)	Report on Earthquake Hazards and Engineering Omitted.	
	Additional information specific to the Stage 3 LNG Facilities is included in Exhibit F/F-I (Environmental Report), submitted separately herewith.	
<u>Terminal Exhibit F</u> § 153.8(a)(7)	Environmental Report Submitted separately herewith as Exhibit F/F-I.	
<u>Terminal Exhibit G</u> § 153.8(a)(8)	Geographical Map A geographical map showing the proposed location of the Stage 3 LNG Facilities is submitted herewith.	
<u>Terminal Exhibit H</u> § 153.8(a)(9)	Statement Identifying Required Federal Authorizations A list of federal and federally-delegated authorizations required by the Stage 3 Project is submitted herewith as Terminal Exhibit H/Pipeline Exhibit J.	
<u>Pipeline Exhibit A</u> § 157.14(a)(1)	Formation Documents The formation documents of Cheniere Corpus Christi Pipeline, L.P. are submitted herewith.	
<u>Pipeline Exhibit B</u> § 157.14(a)(2)	State Authorization The state authorization for Cheniere Corpus Christi Pipeline, L.P. is submitted herewith.	
Pipeline Exhibit C § 157.14(a)(3)	Company Officials A list of names and business addresses of Cheniere Corpus Christi Pipeline, L.P.'s officers is submitted herewith.	
<u>Pipeline Exhibit D</u> § 157.14(a)(4)	Subsidiaries and Affiliation A description of Cheniere Corpus Christi Pipeline, L.P.'s subsidiaries and affiliation, including an organizational chart, is submitted herewith.	
<u>Pipeline Exhibit E</u> § 157.14(a)(5)	Other Pending Applications and Filings Omitted. Discussion of other pending applications and filings that significantly affect this Application is provided in Sections XIII and XIV of this Application.	
Pipeline Exhibit F § 157.14(a)(6)	Location of Facilities A geographical map showing the proposed location of the Stage 3 Pipeline is submitted herewith.	
<u>Pipeline Exhibit F-I</u> § 157.14(a)(7)	Environmental Report Submitted separately herewith as Exhibit F/F-I.	

Pipeline Exhibit G/G-I § 157.14(a)(8) & (9)	Flow Diagrams Flow diagrams showing daily design capacity, reflecting operating conditions and reflecting maximum capabilities on the proposed facilities are submitted separately under seal herewith. Contains CEII—DO NOT RELEASE.
<u>Pipeline Exhibit G-II</u> § 157.14(a)(10)	Flow Diagram Data A statement of engineering design data that explains the flow diagram is submitted separately under seal herewith. Contains CEII—DO NOT RELEASE.
<u>Pipeline Exhibit H</u> § 157.14(a)(11)	Total Gas Supply Data Omitted. Not applicable.
<u>Pipeline Exhibit I</u> § 157(a)(12)	Market Data Omitted. Discussion of market demand is provided in Section VI of this Application.
<u>Pipeline Exhibit J</u> § 157.14(a)(13)	Federal Authorizations A list of federal and federally-delegated authorizations required by the Stage 3 Project is submitted herewith.
<u>Pipeline Exhibit K</u> § 157.14(a)(14)	Cost of Facilities A detailed estimate of the Stage 3 Pipeline's total cost is submitted herewith.
<u>Pipeline Exhibit L</u> § 157.14(a)(15)	Financing A description of Cheniere Corpus Christi Pipeline, L.P.'s plans for financing the Stage 3 Pipeline is submitted herewith.
<u>Pipeline Exhibit M</u> § 157.14(a)(16)	Construction, Operation, and Management A description of Cheniere Corpus Christi Pipeline, L.P.'s plans for constructing, operating, and managing the Stage 3 Pipeline is submitted herewith.
<u>Pipeline Exhibit N</u> § 157.14(a)(17)	Revenues—Expenses—Income An estimate of projected revenues, expenses and income for the Stage 3 Pipeline's first three years of operation, and details of the derivation of rates is submitted herewith.
<u>Pipeline Exhibit O</u> § 157.14(a)(18)	Depreciation and Depletion A description of the depreciation rate used for purposes of deriving proposed rates is submitted herewith.
<u>Pipeline Exhibit P</u> § 157.14(a)(19)	Tariff Tariff records are submitted herewith reflecting the proposed initial recourse rates.

Federal Register Notice §157.6(b)(7) A form of notice suitable for publication in the *Federal Register* is submitted herewith.

XVI. CONCLUSION

For the reasons discussed above, the Applicants respectfully request that the Commission

grant the instant Application by June 28, 2019.

Respectfully submitted,

/s/ Lisa M. Tonery

Lisa M. Tonery Mariah T. Johnston Attorneys for Corpus Christi Liquefaction Stage III, LLC, Corpus Christi Liquefaction, LLC and Cheniere Corpus Christi Pipeline, L.P.

Dated: June 28, 2018

I, Rina Chang, for Corpus Christi Liquefaction Stage III, LLC, Corpus Christi Liquefaction, LLC, and Cheniere Corpus Christi Pipeline, L.P., hereby certify in accordance with 18 C.F.R. § 385.2005(a): that I have read the above and foregoing Application and know its contents; that the contents of the Application are true and correct to the best of my knowledge, information, and belief; and that I possess full power and authority to sign the Application on behalf of Corpus Christi Liquefaction Stage III, LLC, Corpus Christi Liquefaction, LLC, and Cheniere Corpus Christi Pipeline, L.P.

Corpus Christi Liquefaction Stage III, LLC, Corpus Christi Liquefaction, LLC, and Cheniere Corpus Christi Pipeline, L.P.

Kina Chang

Vice President, Environmental

State of , County of

BEFORE ME, the undersigned authority, on this day personally appeared *Lina Charg*, known to me to be the person whose name is subscribed above and is Vice President, Environmental for Corpus Christi Liquefaction Stage III, LLC, Corpus Christi Liquefaction, LLC, and Cheniere Corpus Christi Pipeline, L.P., and who acknowledged to me that she executed same for the purposes therein expressed.

SWORN TO AND SUBSCRIBED before me on the $\frac{28}{200}$ day of $\frac{3}{2000}$, 2018.

Name: Candice Dawn Ruland Title: Notary Public