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To: [LNGStudy](#)
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Subject: Economic Impacts of Liquefied Natural Gas Export
Date: Thursday, January 24, 2013 3:23:05 PM
Attachments: [1-24-2013 Letter to Dept of Energy.pdf](#)
Importance: High

Attached are the comments of the League of Women Voters of Pennsylvania regarding the economic impacts of liquefied natural gas export. If you have questions please contact the League at the following address:

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January 24, 2013

**U.S. Department of Energy (FE-34)
Office of Natural Gas Regulatory Activities
Office of Fossil Energy
P.O. Box 44375
Washington, DC 20026-4375**

Electronic filing: LNGStudy@hq.doe.gov

The League of Women Voters of the Pennsylvania (LWVPA) is appreciative of the opportunity to provide comments to the study of the economic impacts of liquefied natural gas export. Based on our studies of natural gas extraction and pipelines, we have adopted a statewide position. In part, it states:

The LWVPA recognizes that natural gas extracted from Marcellus Shale is a finite, carbon-based, energy resource and that its production significantly affects the environment and the economy of the Commonwealth. Under Natural Resources positions adopted by LWVUS, we believe government policies should promote an environment beneficial to life through the protection and wise management of natural resources in the public interest.

The League of Women Voters of Pennsylvania supports:

- *the maximum protection of public health and the environment in all aspects of Marcellus Shale natural gas production, site restoration, and delivery to the customer, by requiring the use of best practices, and promoting comprehensive regulation, communication, and adequate staffing across government agencies.*
- *siting of natural gas pipelines through coordinated federal, state, regional, and local efforts that are objective and responsive to safety considerations, accurate environmental assessments, county conservation districts, land use planning agencies, and local communities. The process should include adequate public notice of local stakeholders from the beginning of the process, convenient input venues, timelines reflective of the PA Municipal Planning Code, consistency with existing state and local regulation, and a mediation process to resolve conflict.*
- *regulation for the safety of natural gas pipelines that encompasses the entire transmission system, including gathering lines, with standard location data, current, comprehensive maps that are publically accessible, on-going inspection, One Call coverage, odorization, emergency/hazard response contingencies, adequately funded maintenance plans, a reserve trust to compensate for unanticipated events, and mandated best practices to promote the integrity of the system.*

• standardized and comprehensive inspection of all natural gas pipelines by an adequate number of qualified inspectors who are continually updated in their training and employ best practices including on-site evaluations, objective information to verify self-reporting, accurate data gathered from sophisticated technological devices, and the support of local agencies such as emergency response teams and county conservation districts.

• enforcement of regulations for all natural gas pipelines that demonstrate standardization, best practices, costly penalties that encourage compliance, and fines consistent with the nature of the violation.

• measures to insulate regulatory agencies from political influences and other considerations provided by the natural gas companies that they are authorized to regulate. This would prevent the appearance of a conflict of interest and potential ethical concerns.

We believe there are additional considerations worthy of your review, analysis, and inclusion.

- What are the economic impacts in terms of short- and long-term public health?
- What implications, in terms of liability, exist for the industry and communities surrounding not only export facilities but also for drilling, production, and transmission operations?
- What are the projected costs of an “incident?” What insurance will be required? What type of bonding, reserve funds, or other provisions need to be calculated into the economic factors?
- Given the finite nature of fossil fuels, what are the economic implications of closing, modifying, or transitioning these facilities and their employees over time?
- What are the costs, in terms of time, money, and priority setting, for the development of adequate regulations, oversight, and enforcement to protect public health and safety as well as related facilities and infrastructure throughout the “life cycle” of production and export?
- Given climate change concerns, what economic costs are included relative to LNG export that includes natural gas operations and its eventual use, relative to the impact of methane on global warming over the short- and long-term?
- What dollar value is included for the planning, protection, and mitigation of the unanticipated consequences arising from severe weather events and/or climate change on LNG facilities along our coasts and waterways such as storm surges, flooding, and sea level changes?
- What is the financial assessment of the long-term, cumulative impact of LNG export on the land, air, and water and its overall environmental degradation?

Based on LWVPA studies and addenda, we have found significant inconsistencies relative to economic projections of natural gas and the to actual data.¹ In conclusion, the critical mission of the Department of Energy is to *ensure America's security and prosperity by addressing its energy, environmental and nuclear challenges through transformative science and technology solutions.*

The League of Women Voters of Pennsylvania believes that the issue of LNG export must be addressed as part of a larger, national energy policy. This is essential for the security - be it for our citizens, our communities, our state, or our nation. In this regard, we join in concert with the League of Women Voters of the United States in advancing *environmentally sound policies that reduce energy growth rates, emphasize energy conservation and encourage the use of renewable resources.*

Thank you for your consideration.

Olivia Thorne

A handwritten signature in black ink that reads "Olivia Thorne". The signature is written in a cursive, flowing style.

LWVPA President

¹ See LWVPA Studies Natural Gas Extraction from Marcellus Shale and Addenda available at <http://www.palwv.org/Issues/Natural-Resources/Marcellus-Shale.asp>