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**LATHAM & WATKINS** LLP

October 24, 2023

**By Electronic Mail**

Ms. Amy Sweeney  
U.S. Department of Energy  
Office of Fossil Energy  
Office of Regulation, Analysis, and Engagement  
1000 Independence Ave., S.W.  
Washington, D.C. 20026-4375  
[fergas@hq.doe.gov](mailto:fergas@hq.doe.gov)

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Attention: Venture Global LNG, Inc. Notification of Change in Ownership Structure  
Related Amendment of Pending Applications  
Venture Global Calcasieu Pass, LLC, Docket Nos. 13-69-LNG, 14-88-LNG,  
and 15-25-LNG  
Venture Global Plaquemines LNG, LLC, Docket No. 16-28-LNG  
Venture Global CP2 LNG, LLC, Docket No. 21-131-LNG

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Dear Ms. Sweeney:

Pursuant to Section 590.407 of the regulations of the Department of Energy, Office of Fossil Energy and Carbon Management (“DOE/FECM”),<sup>1</sup> the authorizations to export natural gas issued in the above-captioned proceedings, and the “Procedures for Changes in Control Affecting Applications and Authorizations To Import or Export Natural Gas,”<sup>2</sup> Venture Global LNG, Inc. (“Venture Global”) provides notice of a recent internal corporate reorganization that affects the ownership of its subsidiaries that hold authorizations for the export of liquefied natural gas (“LNG”): Venture Global Calcasieu Pass, LLC, (“Calcasieu Pass”), Venture Global Plaquemines LNG, LLC (“Plaquemines LNG”), and Venture Global CP2 LNG, LLC (“CP2 LNG”). Neither the ownership nor management of any of these companies is changing hands and so there is no actual change in control. Furthermore, the internal corporate reorganization does not affect in any way the public interest determinations made by DOE/FECM regarding natural gas exports by these Venture Global subsidiaries. Each of Calcasieu Pass, Plaquemines LNG, and CP2 LNG have applications pending before DOE/FECM however and, accordingly, the change detailed here should be incorporated as amendments to those pending applications.

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<sup>1</sup> 10 C.F.R. § 590.407 (2023)(“Reports of Changes”).

<sup>2</sup> 79 Fed. Reg. 65,541 (Nov. 5, 2014)(the “CIC Procedures”).

## **Background Regarding Venture Global Entities and their Export Authorizations**

Venture Global is the developer of LNG export projects using modular mid-scale plant designs with reliable, proven technology and innovative design configuration to offer low cost, clean and reliable U.S. natural gas supplies to the world. Additional information regarding Venture Global and its leadership, personnel, and projects is available at the company's website at <http://venturegloballng.com/>. Three subsidiaries of Venture Global have been authorized by DOE/FECM to export natural gas: Calcasieu Pass, Plaquemines LNG, and CP2 LNG.

### 1. Calcasieu Pass

Calcasieu Pass was granted long-term, multi-contract authority to export LNG (1) to nations with whom the United States has not entered into a Free Trade Agreement ("FTA") requiring the national treatment of natural gas in Order No. 4346 issued in FE Docket Nos. 13-69-LNG, 14-88-LNG, and 15-25-LNG on March 5, 2019, and (2) to FTA nations in three earlier orders issued in those same dockets individually.<sup>3</sup> The initial applications for export authorization for the Calcasieu Pass Project were filed by Venture Global LNG, LLC, which was wholly-owned by its sole member Venture Global Partners, LLC ("VG Partners"), which in turn was 50 percent owned and controlled by each of Robert B. Pender and Michael A. Sabel (the "Principals").<sup>4</sup> Venture Global LLC subsequently converted its form into the current privately-held Delaware corporation with the same ownership and created Calcasieu Pass as a single purpose subsidiary that was substituted as the holder/applicant for the export authorizations.<sup>5</sup> As explained in Calcasieu Pass' third export application, Venture Global later sold small, passive ownership interests (each of less than ten percent and with no power to direct management or policies) to a number of U.S. institutional investors, with VG Partners (i.e., the Principals) retaining the sole right to control the corporation and to appoint its board of directors who direct the management and policies of Venture Global, as well as of Calcasieu Pass.<sup>6</sup>

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<sup>3</sup> Order No. 3345 issued in Docket No. 13-69-LNG on September 27, 2013; Order No. 3520 issued in Docket No. 14-88-LNG on October 10, 2014; and Order No. 3662 issued in Docket No. 15-25-LNG on June 17, 2015. The term of these authorizations, along with the single non-FTA authorization, was subsequently extended through December 31, 2050, in an order issued in all three dockets. Order No. 3345-A/3520-A/3662-A/4346-A (Oct. 21, 2020).

<sup>4</sup> See Venture Global's May 13, 2013 application in Docket No. 13-69-LNG at 3 and May 13, 2014 application in Docket Nos. 14-88-LNG at 3.

<sup>5</sup> See Venture Global's Sept. 22, 2014 filing in FE Docket Nos. 13-69-LNG and 14-88-LNG (explaining the conversion of Venture Global from an LLC to a corporation and the establishment of Calcasieu Pass as a wholly-owned subsidiary to be the applicant and holder of the export authorizations) and DOE/FE's responsive Notice of Corporate Reorganization issued in those dockets on December 3, 2014.

<sup>6</sup> See Calcasieu Pass' Feb. 9, 2015 application in Docket No. 15-25-LNG at 4-5.

Venture Global made a positive final investment decision (“FID”) and subsequently closed the debt and equity financing of the Calcasieu Pass Project on August 19, 2019, and submitted a related filing with DOE/FECM pursuant to the CIC Procedures on September 6, 2019.<sup>7</sup> As detailed in that submission, Venture Global established in connection with the financing of Calcasieu Pass four new subsidiaries through which to hold its indirect ownership interest, and two entities affiliated with Stonepeak Partners LP (“Stonepeak”), who made equity investments at two different levels of that ownership structure.<sup>8</sup> One of the Stonepeak entities owns preferred units of Calcasieu Pass Holdings, LLC that will convert into common units upon the commercial operation date of the Calcasieu Pass Project and then will constitute a minority of the total common units but more than ten percent.

Calcasieu Pass applied on December 3, 2021, for a limited amendment of its export authorizations to increase the authorized volumes to reflect a refined analysis of peak liquefaction capacity under optimal circumstances. Calcasieu Pass explained its ownership in that amendment application as follows: it is a wholly-owned subsidiary of Venture Global; Venture Global was founded by and originally owned and controlled by VG Partners, which in turn is owned and controlled by the Principals; Venture Global over time has sold small, passive ownership interests to a number of U.S. institutional and related investors and, at the time, approximately 63.54% of the common stock of Venture Global was held by VG Partners, while the other 36.46% of the common stock was owned by a group of institutional investors; each of the institutional investors has no power to direct Venture Global’s management or policies; and VG Partners, which remains wholly owned 50/50 by the Principals, retains the sole right to control Venture Global LNG and to appoint the board of directors who direct its management and policies.<sup>9</sup> DOE/FECM issued Order No. 3662-B on April 22, 2022, amending Calcasieu Pass’ authorized level of exports to FTA nations as requested, while the related uprate request for increased non-FTA exports remains pending before DOE/FECM.<sup>10</sup>

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<sup>7</sup> See Calcasieu Pass’ Sept. 5, 2019 filing in Docket Nos. 13-69-LNG, 14-88-LNG, and 15-25-LNG and the response of DOE/FECM to that CIC filing dated March 17, 2019.

<sup>8</sup> The referenced CIC filing explained not only the Stonepeak investment but also the internal reorganization with the new intermediate subsidiaries – which it noted did not implicate the CIC Procedures. See the CIC filing at 3 & note 4, citing the DOE/FECM response regarding notice of an internal reorganization of Port Arthur LNG, LLC issued in Docket Nos. 15-53-LNG, 18-162-LNG, and 15-96-LNG, dated April 11, 2019 (hereinafter, the “Port Arthur Reorganization Ruling”). An organizational chart showing the ownership structure of Calcasieu Pass (with the 4 entities between it and Venture Global) was provided as an attachment to the filing.

<sup>9</sup> Calcasieu Pass’ Dec. 3, 2021 application for limited amendment in Docket Nos. 13-69-LNG, 14-88-LNG, and 15-25-LNG at 5-6.

<sup>10</sup> The Federal Energy Regulatory Commission approved the related request for amendment of Calcasieu Pass’ FERC authorization on September 22, 2023. *Venture Global Calcasieu Pass, LLC*, 184 FERC ¶ 61,185 (2023).

## 2. Plaquemines LNG

Plaquemines LNG was granted long-term, multi-contract authority to export LNG to non-FTA nations in Order No. 4446 issued in FE Docket No. 16-28-LNG on October 16, 2019, and to FTA nations in Order No. 3866 issued in the same docket on July 21, 2016.<sup>11</sup> In its application for the export authorizations, Plaquemines LNG explained that it was a wholly-owned subsidiary of Venture Global, which was originally wholly-owned by its sole member VG Partners, which in turn is fifty percent owned and controlled the Principals.<sup>12</sup> It further explained that approximately 25.71% of Venture Global's common stock at the time of the application was owned by a group of institutional and related investors, which each owns only a small, passive ownership stake with no power to direct the company's management or policies.<sup>13</sup> And VG Partners (which remained wholly owned 50/50 by the Principals) retained the sole right to control and direct the management and policies of both Venture Global LNG and Plaquemines LNG.<sup>14</sup>

Venture Global completed the financing of its Plaquemines LNG Terminal and made the FID to proceed with it in two phases announced on May 25, 2022, and March 13, 2023. As part of the financing structure, Venture Global created four new subsidiaries through which to hold its indirect ownership interest in Plaquemines LNG, creating an analogous structure to that of Calcasieu Pass. For Plaquemines LNG, however, it was only an internal corporate organization with no outside entity contributing any equity. Therefore, the CIC Procedures were not implicated by that internal restructuring and no CIC filing was submitted to DOE/FECM.

Similar to Calcasieu Pass, Plaquemines LNG has applied for a limited amendment of its export authorizations to increase the authorized volumes to reflect a refined analysis of peak liquefaction capacity under optimal circumstances, in an application filed on March 11, 2022. Plaquemines LNG explained its ownership in that amendment application, just as Calcasieu Pass did in its uprate application, as follows: it is a wholly-owned subsidiary of Venture Global; Venture Global was founded by and originally owned and controlled by VG Partners, which in turn is owned and controlled by the Principals; Venture Global over time has sold small, passive ownership interests to a number of U.S. institutional and related investors and, at the time, approximately 63.54% of the common stock of Venture Global was held by VG Partners, while the other 36.46% of the common stock was owned by a group of institutional investors; each of the institutional investors has no power to direct Venture Global's management or policies; and VG Partners, which remains

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<sup>11</sup> The term of these authorizations was subsequently extended through December 31, 2050. Order No. 3666-A/4446-A (Oct. 21, 2020).

<sup>12</sup> See Plaquemines LNG's March 1, 2016 application in FE Docket No. 16-28-LNG at 3-4.

<sup>13</sup> *Id.* at 4.

<sup>14</sup> *Id.*

wholly owned 50/50 by the Principals, retains the sole right to control Venture Global LNG and to appoint the board of directors who direct its management and policies.<sup>15</sup> DOE/FECM issued Order No. 3866-B on June 13, 2022, amending Plaquemines' authorized level of exports to FTA nations as requested, while the related request for non-FTA exports remains pending.

### 3. CP2 LNG

CP2 LNG applied for its export authorizations on December 2, 2021 in Docket No. 22-131-LNG. In its application, CP2 LNG explained that it was a wholly-owned subsidiary of Venture Global, noting that it was originally wholly-owned by its sole member VG Partners, which in turn is fifty percent owned and controlled the Principals.<sup>16</sup> CP2 LNG further explained that, at the time of its application, approximately 36.46% of Venture Global's common stock was owned by a group of institutional and related investors, which each owns only a small, passive ownership stake with no power to direct the company's management or policies.<sup>17</sup> And thus, VG Partners (which remained wholly owned 50/50 by the Principals) retained the sole right to control and direct the management and policies of both Venture Global LNG and CP2 LNG.<sup>18</sup>

DOE/FECM authorized FTA exports by CP2 LNG in Order No. 4812 issued in Docket No. 21-131-LNG on April 22, 2022. CP2 LNG's application for non-FTA exports is pending in the same proceeding.

### **Background Regarding the CIC Procedures**

As explained in the CIC Procedures, DOE/FE's regulations at 10 C.F.R. Section 590.405 state that authorizations to import or export natural gas shall not be transferable or assignable unless specifically authorized by the Assistant Secretary for Fossil Energy. In applying Section 590.405, DOE/FE has stated that a change in control of an authorization holder may occur through asset sale or stock transfer or by other means. DOE/FE has further explained that it construes a change in control to mean a change, directly or indirectly, of the power to direct the management or policies of an entity, whether such power is exercised through one or more intermediary companies or pursuant to an agreement, written or oral, and whether such power is established through ownership or voting of securities, or common directors, officers, or stockholders, or voting trusts, holding trusts, or debt holdings, or contract, or any other direct or indirect means. Finally, DOE/FE

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<sup>15</sup> Plaquemines LNG's Dec. 3, 2021 application for limited amendment in Docket Nos. 13-69-LNG, 14-88-LNG, and 15-25-LNG at 5-6.

<sup>16</sup> See CP2 LNG's December 2, 2021 application in FE Docket No. 22-131-LNG at 4.

<sup>17</sup> *Id.*

<sup>18</sup> *Id.*

has explained that a rebuttable presumption that control exists will arise from the ownership or the power to vote, directly or indirectly, ten percent or more of the voting securities of an entity.

The CIC Procedures require notification within thirty days after any change in control of the holder of an export authorization is effectuated. The procedures provide that, with respect to FTA long-term export authorizations already issued, DOE/FE will give immediate effect to a change in control upon receipt of the notification and take no further action. With respect to previously issued non-FTA long-term export authorizations, DOE/FE similarly will give immediate effect to the change in control and then will publish notice of the change in the Federal Register, allowing fifteen days for interventions, comments or answers. If no protests are filed and DOE/FE takes no action of its own on the notification, authorization for the change in control is deemed granted thirty days after publication of the notice in the Federal Register. If protests are submitted, DOE/FE then will issue a determination whether the change in control has been demonstrated by the protestor(s) to render the underlying authorization inconsistent with the public interest.

In its 2019 Port Arthur Reorganization Ruling, DOE/FECM ruled that an internal reorganization and merger did not constitute a change in control, explaining that the policy underlying its regulation concerning the assignment or transfer of authorizations, Section 590.405, and therefore the CIC Procedures, “pertains to external transfers or assignments, not purely internal corporate reorganizations.”<sup>19</sup> DOE/FECM pointed out, in support of that ruling, that the CIC Procedures “refer to the ‘ownership or management of the exporting entity *chang[ing] hands*, resulting in a change in control’.”<sup>20</sup> DOE/FECM then concluded that the CIC Procedures “are thus focused on a change in control of the authorization holder from one owner to another, not simply a reshuffling of wholly-owned subsidiaries within the same parent organization.”<sup>21</sup>

### **The Recent Venture Global Reorganization and Application of the CIC Procedures**

In a series of reorganization transactions effective as of September 25, 2023, Venture Global became a wholly-owned subsidiary of a new Delaware corporation (with the same principal place of business as Venture Global and its subsidiaries that hold the export authorizations), Venture Global Holdings, Inc. (“VG Holdings”), and the ownership and control of the Principals moved up a level in the corporate structure to the new holding company. In addition, the Principals now hold their ownership interest in a new entity Venture Global Partners II, LLC (a Delaware limited liability company, again with the same principal place of business) that, just like the former VG Partners, is 50 percent owned and controlled by each of the two Principals. An organizational

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<sup>19</sup> Port Arthur Reorganization Ruling, *supra*. note 8 at 4.

<sup>20</sup> *Id.* at 4 and note 25 (emphasis in original), citing CIC Procedures, 79 Fed. Reg. at 65,541.

<sup>21</sup> *Id.* at 4.



chart showing the ownership structure after the reorganization is attached to this filing. The only change to that structure affecting the ownership of the entities holding export authorizations is the addition of VG Holdings at the top of the organization and the substitution of a differently named entity in which the Principals hold their ownership interests in Venture Global (now indirectly, with one intervening wholly-owned subsidiary).<sup>22</sup>

Just as always has been the case, the two Principals, through a entity they jointly own, retain the sole right to control and direct the management and policies of Venture Global and thus of each of Calcasieu Pass, Plaquemines LNG, or CP2 LNG. The ownership, control, and management of the exporting entities has not in any way changed hands and this internal reorganization should not present any issue for the CIC Procedures for the same reason explained in the Port Arthur Reorganization Ruling.

The institutional passive, minority owners of Venture Global referenced in prior DOE/FECM filings previously summarized also now hold their interest in the new ultimate parent company, VG Holdings. As reflected in the previous summary of prior export applications, the total interest owned by the passive minority owners has varied somewhat over time. Following this corporate reorganization, the Principals' own approximately 84% of the common equity and voting power of VG Holdings, resulting in an increase in their ownership share of Venture Global and its subsidiaries compared to the levels identified in the applications of Calcasieu Pass, Plaquemines LNG, and CP LNG described above. In addition, however, there have been changes in the identity and ownership shares of the various passive minority investors. As a result, funds managed and/or controlled by Pacific Investment Management LLC or "PIMCO" now owns approximately 15.1% of the common equity in VG Holdings. As a result of that interest in VG Holdings, PIMCO indirectly owns that same 15.1% ownership in the equity of each of Calcasieu Pass, Plaquemines LNG, and CP2 LNG, though its ownership of Calcasieu Pass will be reduced to approximately of 11.56% when Stonepeak's preferred interests in Calcasieu Pass Holdings, LLC convert into common units upon the commercial operation date of the Calcasieu Pass Project.

The PIMCO ownership interest creates a rebuttal presumption of control under the CIC Procedures, but that presumption should be deemed rebutted here because of the entirely passive nature of PIMCO's investment in Venture Global. PIMCO is an American investment management firm and global leader in active fixed income management with over \$1.79 trillion of

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<sup>22</sup> That is, prior to the reorganization and as explained in the prior filings with DOE/FECM summarized above, the Principals owned their direct interest in Venture Global through their jointly owned VG Partners. Currently, after the reorganization, the Principals hold their ownership in Venture Global indirectly, through VG Holdings, which owns 100% of Venture Global, and they hold it in a newly substituted entity (owned by them 50/50 just like their old one).

assets under management as of June 30, 2023.<sup>23</sup> PIMCO has no power to direct the management or policies of VH Holdings, Venture Global, or any of their project company subsidiaries holding export authorizations, and plays no role in such management. Just has always been the case, the Principals retain the sole right to control and direct the management and policies of Venture Global LNG and of its three LNG-export subsidiaries (other than Stonepeak's rights with regard to the Calcasieu Pass detailed in the CIG filing submitted on September 6, 2019).

Even if PIMCO's entirely passive, minority ownership interest in VG Holdings were to be somehow viewed as providing some control of the entities holding export authorizations, that change would be entirely consistent with the public interest. PIMCO's investment in VG Holdings, and thus indirectly in the export projects, has strengthened the financial capabilities of Venture Global to construct and execute its Projects, but does not in any way alter the public interest considerations addressed in its export authorization orders. PIMCO's ownership interest provides absolutely no basis to question the DOE/FE decisions to authorize LNG exports by Calcasieu Pass, Plaquemines LNG, and CP2. Of course, the same conclusion is true with respect to Venture Global's internal corporate reorganization detailed herein, to the extent that is viewed as presenting a potential issue under the CIC procedures.

DOE/FE has consistently approved of changes of control in the absence of a demonstration that the change impacts the public interest considerations it evaluated when issuing the export authorizations,<sup>24</sup> and it should do the same here. In accordance with the CIC Procedures, DOE/FECM should give immediate effect to this notification upon receipt. That effect is final and no further action is needed with respect to the FTA authorizations issued to Calcasieu Pass, Plaquemines LNG, and CP2 LNG. With respect to the existing non-FTA authorizations for Calcasieu Pass and Plaquemines LNG, DOE/FECM should publish notice of this notification in the Federal Register, providing fifteen days for interventions, comments or answers, and stating that, if no protests are filed and DOE/FECM takes no action of its own on the notification, authorization for the change in ownership will be deemed granted thirty days after publication of the notice in the Federal Register. If any protest is submitted, DOE/FECM then should issue a determination reaffirming its prior conclusion that the authorized non-FTA LNG exports from Calcasieu Pass and Plaquemines LNG remain not inconsistent with the public interest.

The process under the CIC Procedures is slightly different with respect to CP2 LNG's pending application for non-FTA export authorization, and the uprate amendment application of Calcasieu Pass and Plaquemines LNG that are also pending with respect to the authorized volume of their

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<sup>23</sup> See generally <https://www.pimco.com/en-us/our-firm>.

<sup>24</sup> Links to the very many orders consistently so holding are available on DOE/FECM's website at: <https://www.energy.gov/fecm/articles/change-control-or-transfer-authorizations-import-or-export-natural-gas>.



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non-FTA exports. All those pending applications are hereby amended by this notification with immediate effectiveness. The CIC Procedures provide that DOE/FECM will accept and consider answers to such a CIC notice amending pending applications received within 15 days of service of the notification (which is being made today for this filing). DOE/FECM will then address any such answers in its final order on the pending non-FTA applications, at least to the extent that they argue that there has been a change in control that would be inconsistent with the public interest.

Venture Global and its subsidiaries, of course, reserve the right to respond to any protests or answers regarding this notification, whether directed at the existing non-FTA export authorizations or the amendment to the pending non-FTA applications. If the DOE/FECM Staff have any questions about this notification or related matters, please contact the undersigned counsel for Venture Global.

Sincerely,

*/s/ J. Patrick Nevins*

J. Patrick Nevins  
Latham & Watkins LLP  
Partner  
[Patrick.Nevins@LW.com](mailto:Patrick.Nevins@LW.com)  
D (202) 637-3363

Counsel to Venture Global LNG, Inc.

Dated: October 24, 2023

Appendices Attached:

- Appendix A – Organizational Chart
- Appendix B – Verification
- Appendix C – Opinion of Counsel
- Appendix D – Certificate of Service

## Appendix A

### Organizational Chart



## **Appendix B**

### **Verification**

STATE OF VIRGINIA                    )  
  )  
CITY OF ARLINGTON                 )        SS:

Fory Musser, being first duly sworn on his oath deposes and says: that he is the Senior Vice President, Development of Venture Global LNG, Inc., and an authorized representative of Venture Global Calcasieu Pass, LLC, Venture Global Plaquemines LNG, LLC, and Venture Global CP2 LNG, LLC; that he is duly authorized to make this Verification; that he has read the foregoing submittal and is familiar with the contents thereof; that all the statements and matters contained therein are true and correct to the best of his information, knowledge and belief; and that he is authorized to execute and file the same with the U.S. Department of Energy.



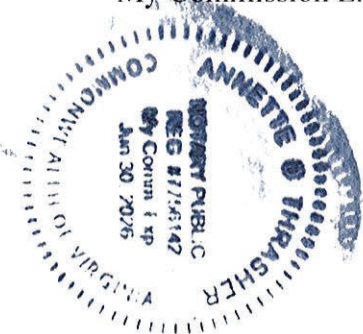
Fory Musser  
Senior Vice President, Development

Sworn to and subscribed before me this 23<sup>rd</sup> day of October, 2023.



Notary Public  
In and For said City

My Commission Expires:



## **Appendix C**

### **OPINION OF COUNSEL**



## Opinion of Counsel

This opinion is submitted pursuant to 10 C.F.R. 590.202(c) of the Department of Energy administrative procedures. The undersigned is General Counsel to Venture Global LNG, Inc. and an authorized representative of Venture Global Calcasieu Pass, LLC, Venture Global Plaquemines LNG, LLC, and Venture Global CP2 LNG, LLC.

I have reviewed the corporate documents of Venture Global LNG, Inc. and its relevant subsidiaries, and it is my opinion that the proposed exports of natural gas are within the companies' corporate powers.

Prepared and submitted.

DocuSigned by:



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Keith Larson

General Counsel

Venture Global LNG, Inc.

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Suite 1500

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[klarson@venturegloballng.com](mailto:klarson@venturegloballng.com)

Dated: October 23, 2023

**Appendix D**

**CERTIFICATE OF SERVICE**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day served the foregoing document upon each person designated on the official service list compiled for Docket Nos. 13-69-LNG, 14-88-LNG, 15-25-LNG, 16-28-LNG, and 21-131-LNG.

Dated at Washington, D.C., this 24<sup>th</sup> day of October, 2023.

/s/ J. Patrick Nevins  
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