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August 17, 2015

VIA FIRST CLASS MAIL

U.S. Department of Energy (FE-34)
Office of Oil and Gas Global Security and Supply
Office of Fossil Energy
P.O. Box 44375

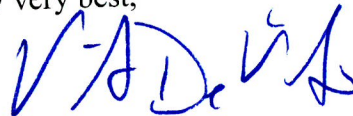
**Re: *Pieridae Energy (USA), Ltd.*
FE Docket No. 14-179-LNG**

Dear Sir/Madam:

Enclosed please find the original Second Supplement to Motion for Leave to Reply of Northeast Energy Solutions, Inc., e-filed today.

If you require additional information, you or your staff may contact me as indicated in this correspondence's the letterhead.

My very best,



Vincent DeVito

VD:ss
Enclosure

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Boston Washington, DC 

**UNITED STATES OF AMERICA
BEFORE THE
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL ENERGY**

Pieridae Energy (USA) Ltd.)
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)

FE Docket No. 14-179-LNG

**SECOND SUPPLEMENT TO MOTION FOR LEAVE TO REPLY
OF
NORTHEAST ENERGY SOLUTIONS, INC.**

Pursuant to Section 590.302(b) of the Administrative Procedures with Respect to the Import and Export of Natural Gas, Northeast Energy Solutions, Inc. (“NEES”) files this Second Supplement to its Motion for Leave to Reply (“Motion”) to Pieridae Energy (USA) Ltd.’s (“Pieridae”) Answer to NEES’ Motion for Leave to Intervene, filed February 27, 2015, in the above captioned proceeding. In support, NEES states, as follows:

I. COMMUNICATIONS

Any communications regarding this pleading or this proceeding should be addressed to:

Vincent DeVito, Esq.
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300 New Jersey Avenue NW
Suite 900
Washington, DC 20001
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(202) 465-8785

II. SECOND SUPPLEMENT TO MOTION TO LEAVE TO REPLY TO PIERIDAE’S ANSWER

Pursuant to Sections 590.302(b) of the Administrative Procedures with Respect to the Import and Export of Natural Gas, codified at 10 C.F.R. Part 590, NEES hereby submits this Second Supplement to its Motion.

As argued in NEES' Motion, under 590.206, DOE/FE should direct additional procedures concerning Pieridae's application, including the filing of supplemental written comments, written interrogatories and/or other discovery procedures, a conference, verbal presentation, and/or adjudication. Further, DOE/FE should require Pieridae to supply supplemental information that expounds upon Pieridae's Second Supplement and Motion to Lodge, as introduced in Pieridae's Second Supplement to Application for Long-Term, Multi-Contract Authorization To Export Natural Gas into Canada for Consumption and Through Canada to Free Trade and Non-Free Trade Agreement Nations After Conversion into LNG ("Second Supplement"). Alternatively, NEES, under 590.310, requests an opportunity to submit and receive answers to written interrogatories.

NEES believes that Pieridae's Second Supplement not only continues to leave numerous questions raised and left unanswered, but Pieridae introduces new information that raises additional concerns with regard to Pieridae's understanding of the U.S. Department of Energy, Office of Fossil Energy's (the "DOE/FE") role with respect to environmental matters.

Specifically, the Second Supplement asks the DOE/FE to accept the premise that its Assistant Secretary is unaware of pending applications within his own office. Pieridae has put forth that a response provide by the DOE/FE to Congress, in the context of Free Trade Agreement countries, was inaccurate. Nothing could be further from the truth. The exchange between Congressman Johnson and Assistant Secretary Smith was solely focused on North American Free Trade Agreement ("FTA") obligations. The Second Supplement completely ignores the FTA context of the exchange. This is an apparent attempt to cause DOE/FE to falsely rely upon a the cascading assertions that fall from the overt, contextual misrepresentation in the Second Supplement.

Further, Pieridae goes on to boldly request that the DOE/FE swap out its own full consideration of the interests of all stakeholders in this proceeding with a single decision by the Minister of Environment of Nova Scotia (“Minster”). Notwithstanding concerns of national sovereignty and the independent function of the FE/DOE in this process, the opinion letter prepared by Canadian counsel and relied upon by Pieridae (“Opinion Letter”) to confirm the “completeness and finality of the conditional environmental assessment approval of Goldboro by the Minister” is materially defective.

Pieridae has asked the FE/DOE to “lodge in the public record of this proceeding such issuance by Canadian Federal and Provincial agencies” because the Minster’s decision is final. Pieridae then goes on to ask the FE/DOE to believe that the Minster’s decision is final because the Opinion Letter confirms the approval of Goldboro by the Minister is final and non-appealable. Unfortunately, neither Pieridae or FE/DOE can rely on the Opinion Letter with regard to the specifics of this proceeding nor with regard to any matters concerning the finality of the Minster’s decision regarding Goldboro. The Opinion Letter is not based on an independent verification of the facts concerning the Goldboro project (the “Project”). The Opinion Letter states that “Our only knowledge of the Project is what has been listed above. We have not taken steps to verify the correctness of this information. We provide this opinion on the assumption that the information is accurate and correct and take no responsibility if the information is found to be inaccurate.” Stated another way: If Pieridae provided the Minster inaccurate information, then the Minster’s decision is appealable. Therefore, unless FE/DOE undertakes an independent investigation as to the facts of the Canadian proceedings, FE/DOE cannot lodge the Minister’s decision or any other materials in the underlying Canadian proceedings. Moreover, in view of the misstatements and vagueness of Pieridae during this proceeding, it is reasonable to conclude that Pieridae has conducted itself similarly within the Canadian proceedings.

In view of the aforementioned, it is clear that more questions need to be answered and additional facts must come to bare from Pieridae. As such, there continues to be insufficient information provided by Pieridae to allow DOE/FE to effectively deliberate and assess its public interest analysis. NEES continues to firmly believe that with the opportunity for additional procedures, including interrogatories, and the requirement of supplemental information by Pieridae, DOE/FE will be better enabled to make a determination in this matter.

III. CONCLUSION

WHEREFORE, based on the foregoing, NEES respectfully requests the DOE/FE to: (1) deny the Second Supplement; (2) deny lodging in these proceedings and considering the Minister's decision, the Opinion Letter, and all appurtenant documents; and, (3) provide for additional procedures in this matter, or grant NEES' motion for additional procedures; and, (4) either (a) suspend consideration of the subject application, or (b) deny, as inconsistent with the public interest, Pieridae's application for export authority to non-FTA Nations.

Respectfully submitted,

By: _____



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August 17, 2015

UNITED STATES OF AMERICA
BEFORE THE
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL ENERGY

Pieridae Energy (USA) Ltd.)
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FE Docket No. 14-179-LNG

VERIFICATION

BOSTON, MASSACHUSETTS

Pursuant to 10 C.F.R. § 590. 103 (b) (2013), Vincent DeVito, being duly sworn, affirms that he is authorized to execute this verification, that he has read the foregoing document, and that all facts stated herein are true and correct to the best of his knowledge, information, and belief.

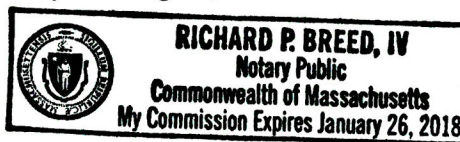
V A DeVito

Vincent DeVito, Esq.
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Boston, MA. 02110
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617.757.6500

Subscribed and sworn to before me this 17th day of August, 2015.

(seal)

R P Breed, IV
Notary Public



My Commission Expires 1/26/2018

**UNITED STATES OF AMERICA
BEFORE THE
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL ENERGY**

Pieridae Energy (USA) Ltd.)
)

FE Docket No. 14-179-LNG

CERTIFIED STATEMENT OF AUTHORIZED REPRESENTATIVE

Pursuant to 10 C.F.R. § 590.103(b) (2013), I, Vincent DeVito, hereby certify that I am a duly authorized representative of Northeast Energy Solutions, and that I am authorized to sign and file with the Department of Energy, Office of Fossil Energy, on behalf of the Northeast Energy Solutions, the foregoing document and in the above-captioned proceeding.

Dated at Boston, MA, this 17th day of August, 2015.



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**UNITED STATES OF AMERICA
BEFORE THE
DEPARTMENT OF ENERGY
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Pieridae Energy (USA) Ltd.)
)

FE Docket No. 14-179-LNG

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon on the applicant and on DOE/FE for inclusion in the FE docket in the proceeding in accordance with 10 C.F.R. § 590.107(b).

Dated at Boston, MA, this 17th day of August, 2015

By:



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