

thUNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

WWALS Watershed Coalition, Inc.,)
LEAD Agency, Inc.,)
Kissimmee Waterkeeper,)
Our Santa Fe River,)
Center for a Sustainable Coast,)
Three Rivers Waterkeeper, and)
Lumber Riverkeeper)

Docket No. RM22-21-000

**RESPONSE TO OPPOSITION COMMENTS OF PIVOTAL LNG, LLC,
by WWALS Watershed Coalition, Inc., LEAD Agency, Inc.,
Kissimmee Waterkeeper, Lake Worth Waterkeeper, Peace+Myakka Waterkeeper,
Collier County Waterkeeper, Three Rivers Waterkeepers, and Food and Water Watch**

On September 20, 2022, Pivotal LNG, LLC¹ (“Pivotal LNG”) filed comments in opposition to the Petition by WWALS Watershed Coalition, Inc. (“WWALS”), et al., to the Federal Energy Regulatory Commission (“FERC”) for Rulemaking on oversight of small-scale inland liquefied natural gas (“LNG”) export facilities (the “Petition”). WWALS hereby submits these comments in response.

Commission regulations prohibit answers to an answer unless otherwise authorized [18 CFR § 385.213(a)(2)]. But the Commission generally accepts answers when they provide information that assists its decision-making process. We ask the Commission to permit this answer.

The Pivotal LNG opposition comments mostly rehashed previous FERC decisions without mentioning new evidence and developments, which WWALS, et. al. supplies in this rebuttal. Consequently, for the reasons explained below, FERC should accept and implement the petition.

¹ Motion to Intervene and Comments of Pivotal LNG, LLC under RM22-21, FERC Accession Number 20220920-5101, September 20, 2022, https://elibrary.ferc.gov/eLibrary/docinfo?accession_number=20220920-5101