

## **A. Revoke previous decisions and take back up oversight of inland LNG export facilities; or**

FERC should revoke its *Shell*, *Emera*, and *Pivotal* decisions, thus requiring all LNG export facilities to be under FERC oversight, as the NGA requires, thus closing the significant and unnecessary gap FERC created in its own jurisdiction.

## **B. Mandate Petitions for Declaratory Order; or**

If FERC is not willing to revoke its *Shell*, *Emera*, and *Pivotal* decisions, it should mandate developers of proposed small-scale inland Liquid Natural Gas (LNG) export facilities file *Petitions for Declaratory Order* with the Commission in order for FERC to determine federal jurisdiction before a developer proceeds with a project, thereby affording FERC an opportunity to:

- Review the proposal;
- Fully understand what the project entails, including ultimate destination and end-users of the LNG;
- Ask pertinent questions; and
- **Establish a formal Docket** for a proposed project in order for the public to fully participate in the approval process.

## **C. Send ORDERS to SHOW CAUSE to each inland LNG export facility**

If FERC cannot mandate such *Petitions for Declaratory Order*, nonetheless FERC can and should send ORDERS to SHOW CAUSE to each inland LNG facility that FERC does not currently consider FERC-jurisdictional.