

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

Pieridae Energy (USA) Ltd.)
)
)

FE Docket No. 14-179-LNG

**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 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.
Bowditch & Dewey, LLP
300 New Jersey Avenue NW
Suite 900
Washington, DC 20001
vdevito@bowditch.com
(202) 465-8785

II. 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 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 redefined business plan, as introduced in Pieridae's 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 ("Supplement"). Alternatively, NEES, under 590.310, requests an opportunity to submit and receive answers to written interrogatories.

NEES believes that Pieridae's Supplement not only continues to leave numerous questions raised and left unanswered, but Pieridae introduces a redefined business plan that raises even more unanswered questions. Specifically, the vagueness with respect to how Pieridae's redefined business plan will affect the (1) Goldboro LNG Project and (2) "some of the arrangements for the supply of natural gas to Goldboro" does not allow for and, in fact, hinders the viability of a thoroughly deliberative process in this matter. *Pieridae Supplement* at 3. There is simply not enough information provided in Pieridae's Supplement to allow DOE/FE to effectively deliberate and assess the national interest analysis, especially as it is wholly unclear how the Goldboro LNG Project, located in Guysborough County, Nova Scotia, Canada, will be impacted by this redefined business plan. NEES firmly believes 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 that the DOE/FE (1) provide for additional procedures in this matter, or grant NEES' motion for additional procedures; and, (2) 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: 

Northeast Energy Systems
Vincent DeVito
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May 21, 2015

UNITED STATES OF AMERICA
BEFORE THE
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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.



Vincent DeVito, Esq.
Bowditch & Dewey, LLP
1 International Place, 44th Floor
Boston, MA. 02110
vdevito@bowditch.com
617.757.6500

Subscribed and sworn to before me this 21st day of May, 2015.



Christine M. Keiley
Notary Public

My Commission Expires



(seal)

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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 21st day of May, 2015.



Vincent DeVito, Esq.
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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 21st day of May, 2015

By:



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