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HQ-2024-02116-F			
Number	Date	Description	Exemption Justification
Document 1	1/26/2024	5:16 PM email from Christopher Davis to David Turk.	The Department of Energy (“DOE”) withheld in part this document under Exemption 6, 5 U.S.C. § 552(b)(6). The information withheld under Exemption 6 consists of Christopher Davis’s non-public telephone number. The information withheld under Exemption 6 would not significantly contribute to the public’s understanding of the activities of the federal government and, if revealed, the information released would invade the Christopher Davis’s privacy and the impact on his privacy would outweigh any public benefit derived from the release of such information.
Document 6	1/26/2024	9:01 PM email from Christopher Davis to Samuel Walsh, Avi Zevin, and David Turk.	DOE withheld in part this document under Exemption 6, 5 U.S.C. § 552(b)(6). The information withheld under Exemption 6 consists of email addresses for several White House Officials and an email address for a distribution list involving multiple agencies. The information withheld under Exemption 6 would not significantly contribute to the public’s understanding of the activities of the federal government and, if revealed, the information released would invade the White House Officials’ privacy and the impact on those individuals’ privacy would outweigh any public benefit derived from the release of such information. Additionally, the email address of the distribution list would not contribute to the public’s understanding of the activities of the federal government, but if revealed, would cause privacy concerns for multiple members of different agencies.  DOE also withheld in part this document under Exemption 5, U.S.C. § 552(b)(5), under the deliberative process privilege. The information withheld under Exemption 5 constitutes an email from White House Officials regarding internal procedures for delegations of authority, a topic that is often the subject of close media scrutiny. The withheld materials include recommendations, advice, and opinions that are part of the process by which agency decisions and policies are formulated. The withheld information represents potential requirements for establishing appropriate delegation authorities and proper protocols for future agency engagement. If these documents were released, it is foreseeable that DOE would be harmed because their release would have a chilling effect on the ability of DOE and other executive branch staff to have open and frank discussions with other agencies and officials on matters of import that would, inevitably, show the give and take of undetermined agency decision making. If

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			these DOE and executive branch staff cannot have frank discussions, this would inhibit informed internal decision-making regarding delegations of authority. As there is no final agency decision on this matter, any public release of the report would cause public confusion that can and should be avoided. The redacted portions of Document 6 do not reference any liquefied natural gas (“LNG”) matters or decisions.
Document 65	1/25/2024	11:10 PM email from Brad Crabtree to Ali Zaidi.	DOE withheld in part this document under Exemption 5, U.S.C. § 552(b)(5), under the deliberative process privilege. The information withheld under Exemption 5 constitutes an email from Brad Crabtree to Ali Zaidi engaging on how to dispel expected misperceptions about a specific liquefied natural gas export project considering DOE’s soon-to-be announced temporary pause of certain liquefied natural gas export decisions. The withheld information in Document 65 does not represent final agency action, and its release would foreseeably harm DOE because it would have a chilling effect on the ability of DOE staff to have open and frank discussions and to make decisions on how to refine its public messaging and process ongoing and future high-visibility agency actions that DOE anticipates may—and in this case did—become the subject of administrative and court challenges. The agency was in the throes of determining the best course of action with multiple, but limited, intergovernmental stakeholders, a move to limit the notable confusion that would inevitably be heightened should the conversations be revealed as the agency determined its next course of action, including its final decision. Public confusion would inevitably arise if these preliminary deliberations were revealed because the withheld deliberations and suggestions regarding the agency’s public messaging relating to the temporary pause of certain LNG export decisions differ from the agency’s final (and fully considered) public message. The conversation was both pre-decisional and deliberative.
Document 83	1/24/2024	6:58PM email from Christopher Davis to Brad Crabtree.	Released in its entirety
Document 86	1/24/2024	5:31 PM email from Greg Degen addressed to Bridget Bartol.	DOE withheld in part this document under Exemption 5, U.S.C. § 552(b)(5), under the deliberative process privilege. The information withheld under Exemption 5 includes a description of contents and edits made to a shared file containing potential DOE talking points, which is also linked in Document 86. The description and the shared file include portions of DOE’s rollout plan for its announcement of

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			<p>a temporary pause of certain liquefied natural gas export decisions, key statistics, and future messaging to respond to expected questions from industry stakeholders, the press, and other interested parties following the announcement. The shared file in Document 86 includes numerous comments and edits from multiple people within the intra or intergovernmental sphere that are both pre-decisional and deliberative.</p> <p>Document 86, including the shared file containing edits and comments, was created before DOE's January 26, 2024 announcement that it would be temporarily pausing certain LNG export decisions. The withheld information includes substantive discussions regarding the rollout plan for the announcement and the preparation of talking points and potential next steps; plans that are pre-decisional and deliberative. The withheld materials in Document 86 do not represent final agency action, and their release would foreseeably harm DOE's decision-making process because it would result in a chilling effect on the ability of DOE staff to have open and frank discussions and to make decisions on how to process potential, ongoing, and future agency actions. DOE was still in the review process of the final agency decision; these conversations involve the pros and cons of that decision and the best ways to communicate that to DOE stakeholders, other governmental stakeholders, and the public. The confusion that releasing these conversations would cause is a cognizable and foreseeable harm to the DOE and its deliberative process. Public confusion would inevitably arise if these preliminary deliberations were revealed because the withheld talking points and suggestions regarding the agency's public messaging relating to the temporary pause of certain LNG export decisions differ from the agency's final (and fully considered) public message.</p>
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HQ-2024-02254-F			
Number	Date	Description	Exemption Justification
Document 1	1/26/2024	<p>1:33 PM chat message from Secretary Granholm to group including Christopher Johns.</p> <p>1:49 PM chat message from David Crane.</p>	<p>DOE withheld in part the document reflecting Secretary Granholm’s 1:33 PM chat message under Exemption 6, 5 U.S.C. § 552(b)(6). The information withheld under Exemption 6 consists of Secretary Granholm’s email address (a withholding which Plaintiff previously informed defendant’s counsel it was not challenging). The information withheld under Exemption 6 would not significantly contribute to the public’s understanding of the activities of the federal government, and if revealed, the information would invade Secretary Granholm’s privacy. The risks significantly outweigh the public’s interest in disclosing that information. As such, the balance must be in favor of withholding that information and protecting the individual from that foreseeable harm.</p> <p>DOE withheld in part the document reflecting David Crane’s 1:49 PM chat message under Exemption 5, 5 U.S.C. § 552(b)(5), under the deliberative process privilege. The information withheld under Exemption 5 constitutes part of a chat message discussing what language to include in talking points, press releases, and other statements planned for public release related to DOE’s announcement of a temporary pause of certain liquefied natural gas export decisions. It is pre-decisional because a decision had not been made on what language to include or exclude in public statements. The draft language discussed in the chat was a recommendation not to use a certain statement, and that statement was not ultimately used. The agency officials and personnel participating in the chat were focused on future messaging to respond to expected questions from industry stakeholders, the press, and other interested parties following the announcement. DOE has an interest in protecting the deliberative process of the give-and-take of agency discussions and the decision-making process.</p> <p>The withheld materials do not represent final agency action, and their release would foreseeably harm DOE because it would have a chilling effect on the ability of DOE staff to have open and frank discussions, present perspectives about what actions to take and why, and to make decisions on how to process ongoing and future high-visibility agency actions that DOE anticipates may—and in this case did—become the subject of administrative and court challenges. The agency was in the throes of determining the best course of action for public outreach to limit the notable confusion that would inevitably be heightened should the conversations be revealed as the agency determined its next course of action. The confusion that releasing such conversations would cause would harm DOE from getting effective opinions from staff if they were too busy thinking such information would be publicly revealed. While the chat message was sent after DOE’s announcement, the substantive discussions for the</p>

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			<p>preparation of talking points, press releases, or other statements planned for public or stakeholder release surrounding DOE’s announcement of a temporary pause of certain LNG export decisions, while relating to a past decision, are pre-decisional because they aid in future policy-oriented decisions such as how to respond to such press or other inquiries, or to position the agency in light of expected future litigation (which ultimately came to fruition when DOE’s decision was challenged in the Western District of Louisiana).</p> <p>Revealing pre-decisional deliberations that were never shared would also cause foreseeable harm in the form of public confusion by disclosing drafts and communications that did not ultimately form part of the agency’s final decision on its ultimate messaging. Revealing this information would foreseeably harm DOE because it would result in a chilling effect for future discussions and preparation of briefing materials to agency officials and staff. Public confusion would inevitably arise if these preliminary deliberations were revealed because the withheld language for talking points, press releases, and public statements regarding the agency’s public messaging relating to the temporary pause of certain LNG export decisions differ from the agency’s final (and fully considered) public message. The harm and chilling effect that would result from revealing this information is also amplified by the litigation surrounding the LNG pause announcement.</p> <p>DOE also withheld in part the document reflecting David Crane’s 1:49 PM chat message under Exemption 6, 5 U.S.C. § 552(b)(6). The information withheld under Exemption 6 consists of specific individual identifying information—a number string—generated by DOE’s chat messaging application. If released, it is foreseeable that the number string would reveal identifying information of the Secretary. The information withheld under Exemption 6 would not contribute to the public’s understanding of the activities of the federal government, and if revealed, the information could invade the Secretary’s privacy. That risk significantly outweighs the public’s interest in disclosing that information. As such, the balance is in favor of withholding the identifying information.</p>
Document 2	1/25/2024	4:58 PM chat message from Brad Crabtree.	Released in its entirety.

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HQ-2024-02097-F <sup>1</sup>			
Number	Date	Description	Exemption Justification
Document 14	8/24/2023	<p>12:41 PM email from Matthew B. Jamieson (National Energy Technology Laboratory (“NETL”)) to Timothy Skone (Office of Fossil Energy and Carbon Management (“FECM”)) and others.</p> <p>Attachment: Portion of an early version of a draft LNG export study with comments and edits.</p>	<p><b>Transmittal Email:</b></p> <p>DOE would withhold in part the transmittal email in Document 14 under Exemption 5, 5 U.S.C. § 552(b)(5), under the deliberative process privilege. The information withheld under Exemption 5 consists of the sender’s opinion regarding the state of the attached section of a draft study, a substantive discussion regarding a method and data currently used in the section of the draft study, how this version and a prior version of the section of the draft study differ, information still missing from the section of the draft study, future additions being considered, what the reviewing team should focus on when reviewing the attachment, and next steps in the review process. The withheld materials are in an email from a NETL contractor to staff-level NETL and DOE employees. The withheld materials are pre-decisional and deliberative and do not represent a final DOE determination or action; the latest email in this chain was sent in August 2023—almost 16 months before the LNG export study was finalized and released in December 2024.</p> <p>The release of this information would foreseeably harm DOE because it would have a chilling effect on the ability of DOE staff to have open and frank discussions about the contents of LNG export studies. The release of this information would prevent DOE from getting effective opinions and insights from staff if they were too worried such information would be publicly revealed at early stages in the process. Revealing pre-decisional deliberations regarding the potential contents of the study that were never shared would also cause foreseeable harm in the form of public confusion by disclosing drafts and communications that contained obsolete data and analysis and that did not ultimately form part of the agency’s final study.</p>

<sup>1</sup> Defendant maintains that it found no responsive documents to FOIA Request Number HQ-2024-02097-F because it found no final LNG export study like those noted in Footnote 1 of Plaintiff’s request and ready for release for the public’s view. However, in the alternative, assuming Plaintiff’s request is construed as seeking draft LNG studies, Defendant asserts the following exemptions apply to the records found in its search for responsive records for HQ-2024-2097-F. Even assuming Plaintiff was seeking draft LNG studies, 82 documents of the 97-document set were not responsive for other reasons. These non-responsive documents are discussed in Amy R. Sweeney’s Declaration ¶¶ 15-18. Defendant did not evaluate whether other FOIA exemptions would apply to these non-responsive documents.

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			<p>DOE would withhold in part the transmittal email in Document 14 under Exemption 6, 5 U.S.C. § 552(b)(6). The information withheld under Exemption 6 consists of Matt Jamieson’s mobile telephone number. The information would not significantly contribute to the public’s understanding of the activities of the federal government and, if revealed, the information released would invade these individuals’ privacy and the impact on those individuals’ privacy would outweigh any public benefit derived from the release of such information.</p> <p><b><i>Attachment:</i></b></p> <p>DOE would withhold in full the attached section of the draft study in Document 14 under Exemption 5, 5 U.S.C. § 552(b)(5), under the deliberative process privilege. The attachment is pre-decisional because it was precursor drafts to DOE’s final LNG export study released in December 2024. The draft study in Document 14 includes many redline edits and comments.</p> <p>The withheld material amounted to pre-decisional communications between contractors and career level DOE staff without final decision-making authority. Those communications were made for the purpose of determining the potential scope and approach for assessing the impacts of LNG exports that would ultimately form an analysis to inform the agency’s ultimate determination as to whether further authorizations for the export of LNG to non-free-trade-agreement countries is consistent with the “public interest,” which is a policy judgment required by the Natural Gas Act. Many pre-decisional drafts of the LNG study, portions of the study, as well as briefing and options slides were circulated between career staff employees within DOE, staff employees at its National Laboratories, and DOE and NETL contractors. These draft studies are an essential part of DOE’s deliberative process in that individuals drafting and reviewing the documents make recommendations, evaluate and make choices on methodologies, debate scientific matters, or express opinions on policy issues related to the impacts of LNG exports. They include candid, internal discussions relating to various options deliberated among contractors and National Laboratory staff. The drafts are sent from NETL staff personnel to DOE staff-level personnel for DOE review. They include recommendations from career agency staff-level employees within FECM, the Office of the General Counsel, NETL, and the Pacific Northwest National Laboratory (“PNNL”).</p> <p>DOE would be foreseeably harmed if these drafts were released. If the candid views of staff contained in draft studies were disclosed, the quality of future internal deliberations on LNG export studies would suffer. The working drafts of the LNG export studies contain comments from staff-level personnel on matters related to complex analyses integral to the study of the economic and</p>
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			<p>environmental impacts of LNG exports. In my opinion, DOE, NETL, PNNL, and contractor personnel would hesitate to provide their frank and forthright opinions and recommendations on these draft documents based on fears that candid recommendations would be broadcast outside the executive branch and misunderstood outside of context. I believe that the disclosure of this material would significantly and adversely impair the integrity and quality of the decision making and drafting process for future LNG export studies. Additionally, release of these documents would create public confusion because these draft studies were never finalized, let alone adopted and released by DOE. The analysis and factual matters presented are not final and contain inaccuracies or outdated information. The draft studies significantly differ from the 2024 LNG Export Study released on December 17, 2024.</p>
<p>Document 16</p>	<p>8/14/2023</p>	<p>10:24 PM email from Scott Matthews (NETL contractor) to Matthew B. Jamieson (NETL) and Timothy Skone (FECM).</p> <p>Attachment: Portion of an early version of a draft LNG export study with comments and edits.</p>	<p><b>Transmittal Email:</b></p> <p>DOE would withhold in part the transmittal email in Document 16 under Exemption 5, 5 U.S.C. § 552(b)(5), under the deliberative process privilege. The withheld information consists of discussions about content for what was being contemplated for a chapter in the draft LNG export study, substantive discussions about the nature of certain modeling results and how those results compare to and align with other results, and the status of other models’ results. The withheld materials are in an email from a NETL contractor to staff-level DOE and NETL employees. The withheld materials are pre-decisional and deliberative and do not represent a final agency determination or action; the latest-in-time email in this chain was sent in August 2023—almost 16 months before the LNG export study was finalized and released in December 2024.</p> <p>The release of this information would foreseeably harm DOE because it would have a chilling effect on the ability of DOE staff to have open and frank discussions about the models and data that go into DOE’s LNG export studies. The release of this information would prevent DOE from getting effective, candid opinions from staff if they were concerned such information would be publicly revealed. Revealing pre-decisional deliberations regarding the potential contents of the study that were never shared would also cause foreseeable harm in the form of public confusion by disclosing communications that contain obsolete data and analysis and that did not ultimately form part of the agency’s final study.</p> <p>DOE would withhold in part the transmittal email in Document 16 under Exemption 6, 5 U.S.C. § 552(b)(6). The information withheld under Exemption 6 consists of Scott Matthew’s mobile telephone number. The information would not significantly contribute to the public’s understanding of the</p>

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			<p>activities of the federal government and, if revealed, the information released would invade these individuals’ privacy and the impact on those individuals’ privacy would outweigh any public benefit derived from the release of such information.</p> <p><b><i>Attachment:</i></b></p> <p>DOE would withhold in full the attached section of the draft study in Document 16 under Exemption 5, 5 U.S.C. § 552(b)(5), under the deliberative process privilege. The attachment is pre-decisional because it was precursor drafts to DOE’s final LNG export study released in December 2024. The draft study in Document 16 includes many redline edits and comments.</p> <p>The withheld material amounted to pre-decisional communications between contractors and career level DOE staff without final decision-making authority. Those communications were made for the purpose of determining the potential scope and approach for assessing the impacts of LNG exports that would ultimately form an analysis to inform the agency’s ultimate determination as to whether further authorizations for the export of LNG to non-free-trade-agreement countries is consistent with the “public interest,” which is a policy judgment required by the Natural Gas Act. Many pre-decisional drafts of the LNG study, portions of the study, as well as briefing and options slides were circulated between career staff employees within DOE, staff employees at its National Laboratories, and DOE and NETL contractors. These draft studies are an essential part of DOE’s deliberative process in that individuals drafting and reviewing the documents make recommendations, evaluate and make choices on methodologies, debate scientific matters, or express opinions on policy issues related to the impacts of LNG exports. They include candid, internal discussions relating to various options deliberated among contractors and National Laboratory staff. The drafts are sent from NETL staff personnel to DOE staff-level personnel for DOE review. They include recommendations from career agency staff-level employees within FECM, the Office of the General Counsel, NETL, and PNNL.</p> <p>DOE would be foreseeably harmed if these drafts were released. If the candid views of staff contained in draft studies were disclosed, the quality of future internal deliberations on LNG export studies would suffer. The working drafts of the LNG export studies contain comments from staff-level personnel on matters related to complex analyses integral to the study of the economic and environmental impacts of LNG exports. In my opinion, DOE, NETL, PNNL, and contractor personnel would hesitate to provide their frank and forthright opinions and recommendations on these draft documents based on fears that candid recommendations would be broadcast outside the executive branch and misunderstood outside of context. I believe that the disclosure of this material would</p>
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			<p>significantly and adversely impair the integrity and quality of the decision making and drafting process for future LNG export studies. Additionally, release of these documents would create public confusion because these draft studies were never finalized, let alone adopted and released by DOE. The analysis and factual matters presented are not final and contain inaccuracies or outdated information. The draft studies significantly differ from the 2024 LNG Export Study released on December 17, 2024.</p>
Document 23	7/31/2023	<p>5:48 PM email from Amanda Harker Steele (NETL) to Timothy Skone (FECM) and others.</p> <p>Attachment: Early version of a draft LNG export study with comments and edits.</p>	<p><b><i>Transmittal Email:</i></b></p> <p>DOE would release in full the transmittal email in Document 23.</p> <p><b><i>Attachment:</i></b></p> <p>DOE would withhold in full the attached section of the draft study in Document 23 under Exemption 5, 5 U.S.C. § 552(b)(5), under the deliberative process privilege. The attachment is pre-decisional because it was precursor drafts to DOE’s final LNG export study released in December 2024. The draft study in Document 23 includes many redline edits and comments.</p> <p>The withheld material amounted to pre-decisional communications between contractors and career level DOE staff without final decision-making authority. Those communications were made for the purpose of determining the potential scope and approach for assessing the impacts of LNG exports that would ultimately form an analysis to inform the agency’s ultimate determination as to whether further authorizations for the export of LNG to non-free-trade-agreement countries is consistent with the “public interest,” which is a policy judgment required by the Natural Gas Act. Many pre-decisional drafts of the LNG study, portions of the study, as well as briefing and options slides were circulated between career staff employees within DOE, staff employees at its National Laboratories, and DOE and NETL contractors. These draft studies are an essential part of DOE’s deliberative process in that individuals drafting and reviewing the documents make recommendations, evaluate and make choices on methodologies, debate scientific matters, or express opinions on policy issues related to the impacts of LNG exports. They include candid, internal discussions relating to various options deliberated among contractors and National Laboratory staff. The drafts are sent from NETL staff personnel to DOE staff-level personnel for DOE review. They include recommendations from career agency staff-level employees within FECM, the Office of the General Counsel, NETL, and PNNL.</p>

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			<p>DOE would be foreseeably harmed if these drafts were released. If the candid views of staff contained in draft studies were disclosed, the quality of future internal deliberations on LNG export studies would suffer. The working drafts of the LNG export studies contain comments from staff-level personnel on matters related to complex analyses integral to the study of the economic and environmental impacts of LNG exports. In my opinion, DOE, NETL, PNNL, and contractor personnel would hesitate to provide their frank and forthright opinions and recommendations on these draft documents based on fears that candid recommendations would be broadcast outside the executive branch and misunderstood outside of context. I believe that the disclosure of this material would significantly and adversely impair the integrity and quality of the decision making and drafting process for future LNG export studies. Additionally, release of these documents would create public confusion because these draft studies were never finalized, let alone adopted and released by DOE. The analysis and factual matters presented are not final and contain inaccuracies or outdated information. The draft studies significantly differ from the 2024 LNG Export Study released on December 17, 2024.</p>
<p>Document 26</p>	<p>8/23/2023</p>	<p>8:52 PM email from Scott Matthews (NETL contractor) to Matthew B. Jamieson (NETL), Timothy Skone (FECM), and others.</p> <p>Attachment: Early version of a draft LNG export study with comments and edits.</p>	<p><b><i>Transmittal Email:</i></b></p> <p>DOE would withhold in part the transmittal email in Document 26 under Exemption 5, 5 U.S.C. § 552(b)(5), under the deliberative process privilege. The information withheld consists of the sender’s opinion regarding the state of the attached section of a draft study, a substantive discussion regarding a method and data currently used in the section of the draft study, how this version and a prior version of the section of the draft study differ, information still missing from the section of the draft study, future additions being considered, what the reviewing team should focus on when reviewing the attachment, and next steps in the review process. The withheld materials are in an email from a NETL contractor to staff-level NETL and DOE employees. The withheld materials are pre-decisional and deliberative and do not represent a final DOE determination or action; the latest email in this chain was sent in August 2023—almost 16 months before the LNG export study was finalized and released in December 2024.</p> <p>The release of this information would foreseeably harm DOE because it would have a chilling effect on the ability of DOE staff to have open and frank discussions about the contents of LNG export studies. The release of this information would prevent DOE from getting effective opinions and insights from staff if they were too worried such information would be publicly revealed at early stages in the process. Revealing pre-decisional deliberations regarding the potential contents of the study that were never shared would also cause foreseeable harm in the form of public confusion by</p>

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			<p>disclosing drafts and communications that contained obsolete data and analysis and that did not ultimately form part of the agency’s final study.</p> <p><b><i>Attachment:</i></b></p> <p>DOE would withhold in full the attached section of the draft study in Document 26 under Exemption 5, 5 U.S.C. § 552(b)(5), under the deliberative process privilege. The attachment is pre-decisional because it was precursor drafts to DOE’s final LNG export study released in December 2024. The draft study in Document 26 includes many redline edits and comments.</p> <p>The withheld material amounted to pre-decisional communications between contractors and career level DOE staff without final decision-making authority. Those communications were made for the purpose of determining the potential scope and approach for assessing the impacts of LNG exports that would ultimately form an analysis to inform the agency’s ultimate determination as to whether further authorizations for the export of LNG to non-free-trade-agreement countries is consistent with the “public interest,” which is a policy judgment required by the Natural Gas Act. Many pre-decisional drafts of the LNG study, portions of the study, as well as briefing and options slides were circulated between career staff employees within DOE, staff employees at its National Laboratories, and DOE and NETL contractors. These draft studies are an essential part of DOE’s deliberative process in that individuals drafting and reviewing the documents make recommendations, evaluate and make choices on methodologies, debate scientific matters, or express opinions on policy issues related to the impacts of LNG exports. They include candid, internal discussions relating to various options deliberated among contractors and National Laboratory staff. The drafts are sent from NETL staff personnel to DOE staff-level personnel for DOE review. They include recommendations from career agency staff-level employees within FECM, the Office of the General Counsel, NETL, and PNNL.</p> <p>DOE would be foreseeably harmed if these drafts were released. If the candid views of staff contained in draft studies were disclosed, the quality of future internal deliberations on LNG export studies would suffer. The working drafts of the LNG export studies contain comments from staff-level personnel on matters related to complex analyses integral to the study of the economic and environmental impacts of LNG exports. In my opinion, DOE, NETL, PNNL, and contractor personnel would hesitate to provide their frank and forthright opinions and recommendations on these draft documents based on fears that candid recommendations would be broadcast outside the executive branch and misunderstood outside of context. I believe that the disclosure of this material would significantly and adversely impair the integrity and quality of the decision making and drafting process</p>
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			<p>for future LNG export studies. Additionally, release of these documents would create public confusion because these draft studies were never finalized, let alone adopted and released by DOE. The analysis and factual matters presented are not final and contain inaccuracies or outdated information. The draft studies significantly differ from the 2024 LNG Export Study released on December 17, 2024.</p>
Document 31	8/2/2023	<p>2:59 PM email from Robert Wallace (DOE contractor) to Amanda Harker Steele (NETL), Kevin Easley (FECM), and Timothy Skone (FECM).</p> <p>Attachment: Early version of a draft LNG export study with comments and edits.</p>	<p><b><i>Transmittal Email:</i></b></p> <p>DOE would withhold in part the transmittal email in Document 31 under Exemption 5, 5 U.S.C. § 552(b)(5), under the deliberative process privilege. The withheld information consists of a substantive comment from a staff-level DOE reviewer about a section of the draft study, a question regarding said comment for further consideration by the group, and a statement from the staff-level DOE reviewer regarding the relevance of certain comments to another section of the draft study. The withheld materials are pre-decisional and deliberative and do not represent a final DOE determination or final agency action; this email was sent in early August 2023—over 16 months before the LNG export study was released in December 2024.</p> <p>The release of this information would foreseeably harm DOE because it would prevent DOE from getting effective candid opinions from staff if they were concerned such information would be publicly revealed. Revealing pre-decisional deliberations regarding working drafts and considerations for portions of the studies that were never shared would also cause foreseeable harm in the form of public confusion by disclosing deliberations that did not ultimately become part of the agency’s final study.</p> <p><b><i>Attachment:</i></b></p> <p>DOE would withhold in full the attached section of the draft study in Document 31 under Exemption 5, 5 U.S.C. § 552(b)(5), under the deliberative process privilege. The attachment is pre-decisional because it was precursor drafts to DOE’s final LNG export study released in December 2024. The draft study in Document 31 includes many redline edits and comments.</p> <p>The withheld material amounted to pre-decisional communications between contractors and career level DOE staff without final decision-making authority. Those communications were made for the purpose of determining the potential scope and approach for assessing the impacts of LNG exports</p>

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			<p>that would ultimately form an analysis to inform the agency’s ultimate determination as to whether further authorizations for the export of LNG to non-free-trade-agreement countries is consistent with the “public interest,” which is a policy judgment required by the Natural Gas Act. Many pre-decisional drafts of the LNG study, portions of the study, as well as briefing and options slides were circulated between career staff employees within DOE, staff employees at its National Laboratories, and DOE and NETL contractors. These draft studies are an essential part of DOE’s deliberative process in that individuals drafting and reviewing the documents make recommendations, evaluate and make choices on methodologies, debate scientific matters, or express opinions on policy issues related to the impacts of LNG exports. They include candid, internal discussions relating to various options deliberated among contractors and National Laboratory staff. The drafts are sent from NETL staff personnel to DOE staff-level personnel for DOE review. They include recommendations from career agency staff-level employees within FECM, the Office of the General Counsel, NETL, and PNNL.</p> <p>DOE would be foreseeably harmed if these drafts were released. If the candid views of staff contained in draft studies were disclosed, the quality of future internal deliberations on LNG export studies would suffer. The working drafts of the LNG export studies contain comments from staff-level personnel on matters related to complex analyses integral to the study of the economic and environmental impacts of LNG exports. In my opinion, DOE, NETL, PNNL, and contractor personnel would hesitate to provide their frank and forthright opinions and recommendations on these draft documents based on fears that candid recommendations would be broadcast outside the executive branch and misunderstood outside of context. I believe that the disclosure of this material would significantly and adversely impair the integrity and quality of the decision making and drafting process for future LNG export studies. Additionally, release of these documents would create public confusion because these draft studies were never finalized, let alone adopted and released by DOE. The analysis and factual matters presented are not final and contain inaccuracies or outdated information. The draft studies significantly differ from the 2024 LNG Export Study released on December 17, 2024.</p>
Document 34	10/11/2023	6:20 PM email from Scott Matthews (NETL contractor) to Matthew B. Jamieson (NETL) and Timothy Skone (FECM).	<p><b><i>Transmittal Email:</i></b></p> <p>DOE would withhold in part the transmittal email in Document 34 under Exemption 5, 5 U.S.C. § 552(b)(5), under the deliberative process privilege. The withheld information consists of a statement regarding the contents of the attached version of the draft study, a statement identifying the portions of the latest draft study on which the sender’s edits focused, a substantive statement regarding work that had not yet been incorporated into the draft study, and the sender’s opinion/understanding of the</p>

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		<p>Attachment: Early version of a draft LNG export study with comments and edits.</p>	<p>status of the draft study and next steps. The withheld materials are in an email from a NETL contractor to staff-level DOE and NETL employees. The withheld materials are pre-decisional and deliberative and do not represent a final DOE determination or action; this email was sent in October 2023—14 months before the LNG export study was released in December 2024.</p> <p>Revealing pre-decisional deliberations regarding the areas for further review would reveal the areas, in the sender’s opinion, that required additional edits or work. The release of this information would foreseeably harm DOE because it would have a chilling effect on the ability of DOE staff to have open and frank discussions about the content of DOE’s LNG export studies. Additionally, revealing discussions regarding the content of the studies that were never shared would also cause foreseeable harm in the form of public confusion by disclosing content and communications that did not ultimately become part of the agency’s final study. Finally, the release of the sender’s opinion/understanding of the status of the draft study would foreseeably harm DOE because it would prevent DOE from getting effective candid opinions from staff if they were concerned such information would be publicly revealed. Revealing the sender’s perception of the working group’s goals surrounding the study would also cause public confusion because, in this draft stage, the working group’s goals were continually changing and shifting.</p> <p><i>Attachment:</i></p> <p>DOE would withhold in full the attached section of the draft study in Document 34 under Exemption 5, 5 U.S.C. § 552(b)(5), under the deliberative process privilege. The attachment is pre-decisional because it was precursor drafts to DOE’s final LNG export study released in December 2024. The draft study in Document 34 includes many redline edits and comments.</p> <p>The withheld material amounted to pre-decisional communications between contractors and career level DOE staff without final decision-making authority. Those communications were made for the purpose of determining the potential scope and approach for assessing the impacts of LNG exports that would ultimately form an analysis to inform the agency’s ultimate determination as to whether further authorizations for the export of LNG to non-free-trade-agreement countries is consistent with the “public interest,” which is a policy judgment required by the Natural Gas Act. Many pre-decisional drafts of the LNG study, portions of the study, as well as briefing and options slides were circulated between career staff employees within DOE, staff employees at its National Laboratories, and DOE and NETL contractors. These draft studies are an essential part of DOE’s deliberative process in that individuals drafting and reviewing the documents make recommendations, evaluate and make choices</p>
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			<p>on methodologies, debate scientific matters, or express opinions on policy issues related to the impacts of LNG exports. They include candid, internal discussions relating to various options deliberated among contractors and National Laboratory staff. The drafts are sent from NETL staff personnel to DOE staff-level personnel for DOE review. They include recommendations from career agency staff-level employees within FECM, the Office of the General Counsel, NETL, and PNNL.</p> <p>DOE would be foreseeably harmed if these drafts were released. If the candid views of staff contained in draft studies were disclosed, the quality of future internal deliberations on LNG export studies would suffer. The working drafts of the LNG export studies contain comments from staff-level personnel on matters related to complex analyses integral to the study of the economic and environmental impacts of LNG exports. In my opinion, DOE, NETL, PNNL, and contractor personnel would hesitate to provide their frank and forthright opinions and recommendations on these draft documents based on fears that candid recommendations would be broadcast outside the executive branch and misunderstood outside of context. I believe that the disclosure of this material would significantly and adversely impair the integrity and quality of the decision making and drafting process for future LNG export studies. Additionally, release of these documents would create public confusion because these draft studies were never finalized, let alone adopted and released by DOE. The analysis and factual matters presented are not final and contain inaccuracies or outdated information. The draft studies significantly differ from the 2024 LNG Export Study released on December 17, 2024.</p>
Document 55	9/5/2023	<p>10:14 PM email from Amanda Harker Steele (NETL) to Thomas Curry (FECM), Timothy Skone (FECM), and others.</p> <p>Attachments: Early version of a draft LNG export study with minimal comments and a separate document listing comments</p>	<p><b>Transmittal Email:</b></p> <p>DOE would release in full the transmittal email in Document 55.</p> <p><b>Attachment:</b></p> <p>DOE would withhold in full the attached section of the draft study in Document 55 under Exemption 5, 5 U.S.C. § 552(b)(5), under the deliberative process privilege. The attachment is pre-decisional because it was precursor drafts to DOE's final LNG export study released in December 2024. The draft study in Document 55 includes only minimal comments in the draft, but the attachment also includes a list of compiled comments from various reviewers regarding the draft study.</p> <p>The withheld material amounted to pre-decisional communications between contractors and career level DOE staff without final decision-making authority. Those communications were made for the</p>

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		<p>regarding the draft study from various reviewers.</p>	<p>purpose of determining the potential scope and approach for assessing the impacts of LNG exports that would ultimately form an analysis to inform the agency’s ultimate determination as to whether further authorizations for the export of LNG to non-free-trade-agreement countries is consistent with the “public interest,” which is a policy judgment required by the Natural Gas Act. Many pre-decisional drafts of the LNG study, portions of the study, as well as briefing and options slides were circulated between career staff employees within DOE, staff employees at its National Laboratories, and DOE and NETL contractors. These draft studies are an essential part of DOE’s deliberative process in that individuals drafting and reviewing the documents make recommendations, evaluate and make choices on methodologies, debate scientific matters, or express opinions on policy issues related to the impacts of LNG exports. They include candid, internal discussions relating to various options deliberated among contractors and National Laboratory staff. The drafts are sent from NETL staff personnel to DOE staff-level personnel for DOE review. They include recommendations from career agency staff-level employees within FECM, the Office of the General Counsel, NETL, and PNNL.</p> <p>DOE would be foreseeably harmed if these drafts were released. If the candid views of staff contained in draft studies were disclosed, the quality of future internal deliberations on LNG export studies would suffer. The working drafts of the LNG export studies contain comments from staff-level personnel on matters related to complex analyses integral to the study of the economic and environmental impacts of LNG exports. In my opinion, DOE, NETL, PNNL, and contractor personnel would hesitate to provide their frank and forthright opinions and recommendations on these draft documents based on fears that candid recommendations would be broadcast outside the executive branch and misunderstood outside of context. I believe that the disclosure of this material would significantly and adversely impair the integrity and quality of the decision making and drafting process for future LNG export studies. Additionally, release of these documents would create public confusion because these draft studies were never finalized, let alone adopted and released by DOE. The analysis and factual matters presented are not final and contain inaccuracies or outdated information. The draft studies significantly differ from the 2024 LNG Export Study released on December 17, 2024.</p>
<p>Document 56</p>	<p>9/6/2023</p>	<p>2:06 PM email from Francisco De La Chesnaye (NETL contractor) to Thomas Curry (FECM), Amy</p>	<p><b>Transmittal Email:</b></p> <p>DOE would withhold in part the transmittal email in Document 56 under Exemption 5, 5 U.S.C. § 552(b)(5), under the deliberative process privilege. The withheld information consists of the sender’s opinion/understanding of the status of the draft study. The withheld materials are in an email from a DOE/NETL contractor to staff-level DOE, NETL, and PNNL employees. The withheld materials are</p>

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		<p>Sweeney (FECM), and others.</p> <p>Attachment: Early version of a draft LNG export study. No comments but sent for DOE review.</p>	<p>pre-decisional and deliberative and do not represent a final DOE determination or action; the latest email in this chain was sent in September 2023—over 15 months before the LNG export study was released in December 2024.</p> <p>The release of the sender’s opinion would foreseeably harm DOE because it would prevent DOE from getting effective candid opinions from staff if they were concerned such information would be publicly revealed.</p> <p>DOE would withhold in part the transmittal email under Exemption 6, 5 U.S.C. § 552(b)(6). The information withheld under Exemption 6 consists of Francisco De La Chesnaye’s mobile telephone number. The information would not significantly contribute to the public’s understanding of the activities of the federal government and, if revealed, the information released would invade these individuals’ privacy and the impact on those individuals’ privacy would outweigh any public benefit derived from the release of such information.</p> <p><i>Attachment:</i></p> <p>DOE would withhold in full the attached section of the draft study in Document 56 under Exemption 5, 5 U.S.C. § 552(b)(5), under the deliberative process privilege. The attachment is pre-decisional because it was precursor drafts to DOE’s final LNG export study released in December 2024. The draft study in Document 56 includes a draft LNG export study without visible comments or edits, but these drafts are still precursors to the final December 2024 study. These “clean versions” were sent to DOE, from NETL or its contractors, for DOE review. DOE subsequently returned the drafts with substantial edits. The latest-in-time draft study in the timeframe relevant timeframe to Plaintiff’s FOIA request—attachment in Document 81, sent October 27, 2023—includes extensive comments and edits.</p> <p>The withheld material amounted to pre-decisional communications between contractors and career level DOE staff without final decision-making authority. Those communications were made for the purpose of determining the potential scope and approach for assessing the impacts of LNG exports that would ultimately form an analysis to inform the agency’s ultimate determination as to whether further authorizations for the export of LNG to non-free-trade-agreement countries is consistent with the “public interest,” which is a policy judgment required by the Natural Gas Act. Many pre-decisional drafts of the LNG study, portions of the study, as well as briefing and options slides were circulated between career staff employees within DOE, staff employees at its National Laboratories, and DOE</p>
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			<p>and NETL contractors. These draft studies are an essential part of DOE's deliberative process in that individuals drafting and reviewing the documents make recommendations, evaluate and make choices on methodologies, debate scientific matters, or express opinions on policy issues related to the impacts of LNG exports. They include candid, internal discussions relating to various options deliberated among contractors and National Laboratory staff. The drafts are sent from NETL staff personnel to DOE staff-level personnel for DOE review. They include recommendations from career agency staff-level employees within FECM, the Office of the General Counsel, NETL, and PNNL.</p> <p>DOE would be foreseeably harmed if these drafts were released. If the candid views of staff contained in draft studies were disclosed, the quality of future internal deliberations on LNG export studies would suffer. The working drafts of the LNG export studies contain comments from staff-level personnel on matters related to complex analyses integral to the study of the economic and environmental impacts of LNG exports. In my opinion, DOE, NETL, PNNL, and contractor personnel would hesitate to provide their frank and forthright opinions and recommendations on these draft documents based on fears that candid recommendations would be broadcast outside the executive branch and misunderstood outside of context. I believe that the disclosure of this material would significantly and adversely impair the integrity and quality of the decision making and drafting process for future LNG export studies. Additionally, release of these documents would create public confusion because these draft studies were never finalized, let alone adopted and released by DOE. The analysis and factual matters presented are not final and contain inaccuracies or outdated information. The draft studies significantly differ from the 2024 LNG Export Study released on December 17, 2024.</p>
Document 59	7/21/2023	<p>7:51 PM email from Amanda Harker Steele (NETL) to Thomas Curry (FECM), Timothy Skone (FECM), and others.</p> <p>Attachment: Early version of a draft LNG export study with comments and edits. Briefing slides were also</p>	<p><b>Transmittal Email:</b></p> <p>DOE would release in full the transmittal email in Document 59.</p> <p><b>Attachment:</b></p> <p>DOE would withhold in full the attached section of the draft study in Document 59 under Exemption 5, 5 U.S.C. § 552(b)(5), under the deliberative process privilege. The attachment is pre-decisional because it was precursor drafts to DOE's final LNG export study released in December 2024. The draft study in Document 55 includes only minimal comments in the draft, but the attachment also includes a list of compiled comments from various reviewers regarding the draft study.</p>

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		<p>attached but were deemed nonresponsive to Plaintiff's FOIA request.</p>	<p>The withheld material amounted to pre-decisional communications between contractors and career level DOE staff without final decision-making authority. Those communications were made for the purpose of determining the potential scope and approach for assessing the impacts of LNG exports that would ultimately form an analysis to inform the agency's ultimate determination as to whether further authorizations for the export of LNG to non-free-trade-agreement countries is consistent with the "public interest," which is a policy judgment required by the Natural Gas Act. Many pre-decisional drafts of the LNG study, portions of the study, as well as briefing and options slides were circulated between career staff employees within DOE, staff employees at its National Laboratories, and DOE and NETL contractors. These draft studies are an essential part of DOE's deliberative process in that individuals drafting and reviewing the documents make recommendations, evaluate and make choices on methodologies, debate scientific matters, or express opinions on policy issues related to the impacts of LNG exports. They include candid, internal discussions relating to various options deliberated among contractors and National Laboratory staff. The drafts are sent from NETL staff personnel to DOE staff-level personnel for DOE review. They include recommendations from career agency staff-level employees within FECM, the Office of the General Counsel, NETL, and PNNL.</p> <p>DOE would be foreseeably harmed if these drafts were released. If the candid views of staff contained in draft studies were disclosed, the quality of future internal deliberations on LNG export studies would suffer. The working drafts of the LNG export studies contain comments from staff-level personnel on matters related to complex analyses integral to the study of the economic and environmental impacts of LNG exports. In my opinion, DOE, NETL, PNNL, and contractor personnel would hesitate to provide their frank and forthright opinions and recommendations on these draft documents based on fears that candid recommendations would be broadcast outside the executive branch and misunderstood outside of context. I believe that the disclosure of this material would significantly and adversely impair the integrity and quality of the decision making and drafting process for future LNG export studies. Additionally, release of these documents would create public confusion because these draft studies were never finalized, let alone adopted and released by DOE. The analysis and factual matters presented are not final and contain inaccuracies or outdated information. The draft studies significantly differ from the 2024 LNG Export Study released on December 17, 2024.</p>
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<p>Document 61</p>	<p>6/16/2023</p>	<p>6:43 PM email from Amanda Harker Steele (NETL) to Thomas Curry (FECM), Amy Sweeney (FECM), and others.</p> <p>Attachment: Early version of a draft LNG export study with comments and edits.</p>	<p><b>Transmittal Email:</b></p> <p>DOE would release in full the transmittal email in Document 61.</p> <p><b>Attachment:</b></p> <p>DOE would withhold in full the attached section of the draft study in Document 61 under Exemption 5, 5 U.S.C. § 552(b)(5), under the deliberative process privilege. The attachment is pre-decisional because it was precursor drafts to DOE’s final LNG export study released in December 2024. The draft study in Document 61 includes many redline edits and comments.</p> <p>The withheld material amounted to pre-decisional communications between contractors and career level DOE staff without final decision-making authority. Those communications were made for the purpose of determining the potential scope and approach for assessing the impacts of LNG exports that would ultimately form an analysis to inform the agency’s ultimate determination as to whether further authorizations for the export of LNG to non-free-trade-agreement countries is consistent with the “public interest,” which is a policy judgment required by the Natural Gas Act. Many pre-decisional drafts of the LNG study, portions of the study, as well as briefing and options slides were circulated between career staff employees within DOE, staff employees at its National Laboratories, and DOE and NETL contractors. These draft studies are an essential part of DOE’s deliberative process in that individuals drafting and reviewing the documents make recommendations, evaluate and make choices on methodologies, debate scientific matters, or express opinions on policy issues related to the impacts of LNG exports. They include candid, internal discussions relating to various options deliberated among contractors and National Laboratory staff. The drafts are sent from NETL staff personnel to DOE staff-level personnel for DOE review. They include recommendations from career agency staff-level employees within FECM, the Office of the General Counsel, NETL, and PNNL.</p> <p>DOE would be foreseeably harmed if these drafts were released. If the candid views of staff contained in draft studies were disclosed, the quality of future internal deliberations on LNG export studies would suffer. The working drafts of the LNG export studies contain comments from staff-level personnel on matters related to complex analyses integral to the study of the economic and environmental impacts of LNG exports. In my opinion, DOE, NETL, PNNL, and contractor personnel would hesitate to provide their frank and forthright opinions and recommendations on these draft documents based on fears that candid recommendations would be broadcast outside the executive</p>
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			<p>branch and misunderstood outside of context. I believe that the disclosure of this material would significantly and adversely impair the integrity and quality of the decision making and drafting process for future LNG export studies. Additionally, release of these documents would create public confusion because these draft studies were never finalized, let alone adopted and released by DOE. The analysis and factual matters presented are not final and contain inaccuracies or outdated information. The draft studies significantly differ from the 2024 LNG Export Study released on December 17, 2024.</p>
Document 63	8/11/2023	<p>7:25 PM email from Amanda Harker Steele (NETL) to Kevin Easley (FECM), Thomas Curry (FECM), and others.</p> <p>Attachments: Early version of a draft LNG export study with comments and a separate document listing comments regarding the draft study from various reviewers.</p>	<p><b>Transmittal Email:</b></p> <p>DOE would release in full the transmittal email in Document 63.</p> <p><b>Attachment:</b></p> <p>DOE would withhold in full the attached section of the draft study in Document 63 under Exemption 5, 5 U.S.C. § 552(b)(5), under the deliberative process privilege. The attachment is pre-decisional because it was precursor drafts to DOE’s final LNG export study released in December 2024. The draft study in Document 63 includes many redline edits and comments.</p> <p>The withheld material amounted to pre-decisional communications between contractors and career level DOE staff without final decision-making authority. Those communications were made for the purpose of determining the potential scope and approach for assessing the impacts of LNG exports that would ultimately form an analysis to inform the agency’s ultimate determination as to whether further authorizations for the export of LNG to non-free-trade-agreement countries is consistent with the “public interest,” which is a policy judgment required by the Natural Gas Act. Many pre-decisional drafts of the LNG study, portions of the study, as well as briefing and options slides were circulated between career staff employees within DOE, staff employees at its National Laboratories, and DOE and NETL contractors. These draft studies are an essential part of DOE’s deliberative process in that individuals drafting and reviewing the documents make recommendations, evaluate and make choices on methodologies, debate scientific matters, or express opinions on policy issues related to the impacts of LNG exports. They include candid, internal discussions relating to various options deliberated among contractors and National Laboratory staff. The drafts are sent from NETL staff personnel to DOE staff-level personnel for DOE review. They include recommendations from career agency staff-level employees within FECM, the Office of the General Counsel, NETL, and PNNL.</p>

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			DOE would be foreseeably harmed if these drafts were released. If the candid views of staff contained in draft studies were disclosed, the quality of future internal deliberations on LNG export studies would suffer. The working drafts of the LNG export studies contain comments from staff-level personnel on matters related to complex analyses integral to the study of the economic and environmental impacts of LNG exports. In my opinion, DOE, NETL, PNNL, and contractor personnel would hesitate to provide their frank and forthright opinions and recommendations on these draft documents based on fears that candid recommendations would be broadcast outside the executive branch and misunderstood outside of context. I believe that the disclosure of this material would significantly and adversely impair the integrity and quality of the decision making and drafting process for future LNG export studies. Additionally, release of these documents would create public confusion because these draft studies were never finalized, let alone adopted and released by DOE. The analysis and factual matters presented are not final and contain inaccuracies or outdated information. The draft studies significantly differ from the 2024 LNG Export Study released on December 17, 2024.
Document 65	6/9/2023	<p>7:56 PM email from Amanda Harker Steele (NETL) to Thomas Curry (FECM), Amy Sweeney (FECM), and others.</p> <p>Attachment: Early version of a draft LNG export study with comments.</p>	<p><b><i>Transmittal Email:</i></b></p> <p>DOE would release in full the transmittal email in Document 65.</p> <p><b><i>Attachment:</i></b></p> <p>DOE would withhold in full the attached section of the draft study in Document 65 under Exemption 5, 5 U.S.C. § 552(b)(5), under the deliberative process privilege. The attachment is pre-decisional because it was precursor drafts to DOE’s final LNG export study released in December 2024. The draft study in Document 65 includes many redline edits and comments.</p> <p>The withheld material amounted to pre-decisional communications between contractors and career level DOE staff without final decision-making authority. Those communications were made for the purpose of determining the potential scope and approach for assessing the impacts of LNG exports that would ultimately form an analysis to inform the agency’s ultimate determination as to whether further authorizations for the export of LNG to non-free-trade-agreement countries is consistent with the “public interest,” which is a policy judgment required by the Natural Gas Act. Many pre-decisional drafts of the LNG study, portions of the study, as well as briefing and options slides were circulated between career staff employees within DOE, staff employees at its National Laboratories, and DOE and NETL contractors. These draft studies are an essential part of DOE’s deliberative process in that</p>

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			<p>individuals drafting and reviewing the documents make recommendations, evaluate and make choices on methodologies, debate scientific matters, or express opinions on policy issues related to the impacts of LNG exports. They include candid, internal discussions relating to various options deliberated among contractors and National Laboratory staff. The drafts are sent from NETL staff personnel to DOE staff-level personnel for DOE review. They include recommendations from career agency staff-level employees within FECM, the Office of the General Counsel, NETL, and PNNL.</p> <p>DOE would be foreseeably harmed if these drafts were released. If the candid views of staff contained in draft studies were disclosed, the quality of future internal deliberations on LNG export studies would suffer. The working drafts of the LNG export studies contain comments from staff-level personnel on matters related to complex analyses integral to the study of the economic and environmental impacts of LNG exports. In my opinion, DOE, NETL, PNNL, and contractor personnel would hesitate to provide their frank and forthright opinions and recommendations on these draft documents based on fears that candid recommendations would be broadcast outside the executive branch and misunderstood outside of context. I believe that the disclosure of this material would significantly and adversely impair the integrity and quality of the decision making and drafting process for future LNG export studies. Additionally, release of these documents would create public confusion because these draft studies were never finalized, let alone adopted and released by DOE. The analysis and factual matters presented are not final and contain inaccuracies or outdated information. The draft studies significantly differ from the 2024 LNG Export Study released on December 17, 2024.</p>
<p>Document 78</p>	<p>8/30/2023</p>	<p>9:14 PM email from Amanda Harker Steele (NETL) to Kevin Easley (FECM), Thomas Curry (FECM), and others.</p> <p>Attachments: Early version of a draft LNG export study with comments and a separate document listing comments regarding the</p>	<p><b><i>Transmittal Email:</i></b></p> <p>DOE would release in full the transmittal email in Document 78.</p> <p><b><i>Attachment:</i></b></p> <p>DOE would withhold in full the attached section of the draft study in Document 78 under Exemption 5, 5 U.S.C. § 552(b)(5), under the deliberative process privilege. The attachment is pre-decisional because it was precursor drafts to DOE’s final LNG export study released in December 2024. The draft study in Document 78 includes many redline edits and comments.</p>

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		<p>draft study from various reviewers.</p>	<p>The withheld material amounted to pre-decisional communications between contractors and career level DOE staff without final decision-making authority. Those communications were made for the purpose of determining the potential scope and approach for assessing the impacts of LNG exports that would ultimately form an analysis to inform the agency’s ultimate determination as to whether further authorizations for the export of LNG to non-free-trade-agreement countries is consistent with the “public interest,” which is a policy judgment required by the Natural Gas Act. Many pre-decisional drafts of the LNG study, portions of the study, as well as briefing and options slides were circulated between career staff employees within DOE, staff employees at its National Laboratories, and DOE and NETL contractors. These draft studies are an essential part of DOE’s deliberative process in that individuals drafting and reviewing the documents make recommendations, evaluate and make choices on methodologies, debate scientific matters, or express opinions on policy issues related to the impacts of LNG exports. They include candid, internal discussions relating to various options deliberated among contractors and National Laboratory staff. The drafts are sent from NETL staff personnel to DOE staff-level personnel for DOE review. They include recommendations from career agency staff-level employees within FECM, the Office of the General Counsel, NETL, and PNNL.</p> <p>DOE would be foreseeably harmed if these drafts were released. If the candid views of staff contained in draft studies were disclosed, the quality of future internal deliberations on LNG export studies would suffer. The working drafts of the LNG export studies contain comments from staff-level personnel on matters related to complex analyses integral to the study of the economic and environmental impacts of LNG exports. In my opinion, DOE, NETL, PNNL, and contractor personnel would hesitate to provide their frank and forthright opinions and recommendations on these draft documents based on fears that candid recommendations would be broadcast outside the executive branch and misunderstood outside of context. I believe that the disclosure of this material would significantly and adversely impair the integrity and quality of the decision making and drafting process for future LNG export studies. Additionally, release of these documents would create public confusion because these draft studies were never finalized, let alone adopted and released by DOE. The analysis and factual matters presented are not final and contain inaccuracies or outdated information. The draft studies significantly differ from the 2024 LNG Export Study released on December 17, 2024.</p>
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<p>Document 81</p>	<p>10/27/2023</p>	<p>1:22 PM email from Francisco De La Chesnaye (DOE contractor) to Thomas Curry (FECM) and others, with Amanda Harker Steele (NETL) and others on copy.</p> <p>Attachment: Early version of a draft LNG export study with edits comments.</p>	<p><b><i>Transmittal Email:</i></b></p> <p>DOE would withhold in part the transmittal email in Document 81 under Exemption 5, 5 U.S.C. § 552(b)(5), under the deliberative process privilege. The withheld information consists of a statement regarding a substantive addition to the draft study, and substantive discussion topics for an upcoming meeting. The withheld materials are in an email from a DOE/NETL contractor to staff-level DOE, NETL, and PNNL employees. The withheld materials are pre-decisional and deliberative and do not represent a final DOE determination or agency action; this email was sent in October 2023—over 13 months before the LNG export study was released in December 2024.</p> <p>Revealing the substantive additions to this draft study would foreseeably harm DOE because it would have a chilling effect on the ability of DOE staff to have open and frank discussions about the content of DOE’s LNG export studies. Revealing pre-decisional deliberations regarding the areas for further discussion could reveal the areas, in the senders’ opinion, that required additional edits or work. The release of this information would foreseeably harm DOE because it would prevent DOE from getting effective candid opinions from staff if they were concerned such information would be publicly revealed.</p> <p>DOE would withhold in part the transmittal email under Exemption 6, 5 U.S.C. § 552(b)(6). The information withheld under Exemption 6 consists of Francisco De La Chesnaye’s mobile telephone number. The information would not significantly contribute to the public’s understanding of the activities of the federal government and, if revealed, the information released would invade these individuals’ privacy and the impact on those individuals’ privacy would outweigh any public benefit derived from the release of such information.</p> <p><b><i>Attachment:</i></b></p> <p>DOE would withhold in full the attached section of the draft study in Document 81 under Exemption 5, 5 U.S.C. § 552(b)(5), under the deliberative process privilege. The attachment is pre-decisional because it was precursor drafts to DOE’s final LNG export study released in December 2024. The draft study in Document 81 includes many redline edits and comments.</p> <p>The withheld material amounted to pre-decisional communications between contractors and career level DOE staff without final decision-making authority. Those communications were made for the</p>
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			<p>purpose of determining the potential scope and approach for assessing the impacts of LNG exports that would ultimately form an analysis to inform the agency’s ultimate determination as to whether further authorizations for the export of LNG to non-free-trade-agreement countries is consistent with the “public interest,” which is a policy judgment required by the Natural Gas Act. Many pre-decisional drafts of the LNG study, portions of the study, as well as briefing and options slides were circulated between career staff employees within DOE, staff employees at its National Laboratories, and DOE and NETL contractors. These draft studies are an essential part of DOE’s deliberative process in that individuals drafting and reviewing the documents make recommendations, evaluate and make choices on methodologies, debate scientific matters, or express opinions on policy issues related to the impacts of LNG exports. They include candid, internal discussions relating to various options deliberated among contractors and National Laboratory staff. The drafts are sent from NETL staff personnel to DOE staff-level personnel for DOE review. They include recommendations from career agency staff-level employees within FECM, the Office of the General Counsel, NETL, and PNNL.</p> <p>DOE would be foreseeably harmed if these drafts were released. If the candid views of staff contained in draft studies were disclosed, the quality of future internal deliberations on LNG export studies would suffer. The working drafts of the LNG export studies contain comments from staff-level personnel on matters related to complex analyses integral to the study of the economic and environmental impacts of LNG exports. In my opinion, DOE, NETL, PNNL, and contractor personnel would hesitate to provide their frank and forthright opinions and recommendations on these draft documents based on fears that candid recommendations would be broadcast outside the executive branch and misunderstood outside of context. I believe that the disclosure of this material would significantly and adversely impair the integrity and quality of the decision making and drafting process for future LNG export studies. Additionally, release of these documents would create public confusion because these draft studies were never finalized, let alone adopted and released by DOE. The analysis and factual matters presented are not final and contain inaccuracies or outdated information. The draft studies significantly differ from the 2024 LNG Export Study released on December 17, 2024.</p>
<p>Document 87</p>	<p>8/2/2023</p>	<p>5:56 PM email from Amanda Harker Steele (NETL) to Kevin Easley (FECM), Timothy Skone (FECM), and others.</p>	<p><b>Transmittal Email:</b></p> <p>DOE would withhold in part the transmittal email in Document 87 under Exemption 5, 5 U.S.C. § 552(b)(5), under the deliberative process privilege. The withheld information consists of a statement regarding an internal group goal for the study. The withheld materials are in an email from a staff-level NETL employee to staff-level DOE and NETL employees. The withheld materials are pre-</p>

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		<p>Attachment: Early version of a draft LNG export study with edits comments.</p>	<p>decisional and deliberative and do not represent a final DOE determination or agency action; this email was sent in August 2023—over 15 months before the LNG export study was released in December 2024. These goals were dynamic and often shifted as a result of setbacks or changes of course.</p> <p>These goals were dynamic and often shifted as a result of setbacks or changes of course. Revealing the group’s internal goals would foreseeably harm DOE because it would have a chilling effect on the ability of DOE staff to have open and frank discussions about the process for drafting the study. The release of this information would also foreseeably harm DOE because it would prevent DOE from getting effective candid opinions from staff if they were worried thinking such information would be publicly revealed.</p> <p><b>Attachment:</b></p> <p>DOE would withhold in full the attached section of the draft study in Document 87 under Exemption 5, 5 U.S.C. § 552(b)(5), under the deliberative process privilege. The attachment is pre-decisional because it was precursor drafts to DOE’s final LNG export study released in December 2024. The draft study in Document 87 includes many redline edits and comments.</p> <p>The withheld material amounted to pre-decisional communications between contractors and career level DOE staff without final decision-making authority. Those communications were made for the purpose of determining the potential scope and approach for assessing the impacts of LNG exports that would ultimately form an analysis to inform the agency’s ultimate determination as to whether further authorizations for the export of LNG to non-free-trade-agreement countries is consistent with the “public interest,” which is a policy judgment required by the Natural Gas Act. Many pre-decisional drafts of the LNG study, portions of the study, as well as briefing and options slides were circulated between career staff employees within DOE, staff employees at its National Laboratories, and DOE and NETL contractors. These draft studies are an essential part of DOE’s deliberative process in that individuals drafting and reviewing the documents make recommendations, evaluate and make choices on methodologies, debate scientific matters, or express opinions on policy issues related to the impacts of LNG exports. They include candid, internal discussions relating to various options deliberated among contractors and National Laboratory staff. The drafts are sent from NETL staff personnel to DOE staff-level personnel for DOE review. They include recommendations from career agency staff-level employees within FECM, the Office of the General Counsel, NETL, and PNNL.</p>
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			<p>DOE would be foreseeably harmed if these drafts were released. If the candid views of staff contained in draft studies were disclosed, the quality of future internal deliberations on LNG export studies would suffer. The working drafts of the LNG export studies contain comments from staff-level personnel on matters related to complex analyses integral to the study of the economic and environmental impacts of LNG exports. In my opinion, DOE, NETL, PNNL, and contractor personnel would hesitate to provide their frank and forthright opinions and recommendations on these draft documents based on fears that candid recommendations would be broadcast outside the executive branch and misunderstood outside of context. I believe that the disclosure of this material would significantly and adversely impair the integrity and quality of the decision making and drafting process for future LNG export studies. Additionally, release of these documents would create public confusion because these draft studies were never finalized, let alone adopted and released by DOE. The analysis and factual matters presented are not final and contain inaccuracies or outdated information. The draft studies significantly differ from the 2024 LNG Export Study released on December 17, 2024.</p>
<p>Document 89</p>	<p>8/24/2023</p>	<p>7:52 PM email from Francisco De La Chesnaye (DOE contractor) to Thomas Curry (FECM) and Amy Sweeney (FECM), with Matthew B. Jamieson (NETL), and others on copy.</p> <p>Attachment: Early version of a draft LNG export study. No comments but sent for DOE review.</p>	<p><b><i>Transmittal Email:</i></b></p> <p>DOE would withhold in part the transmittal email in Document 89 under Exemption 5, 5 U.S.C. § 552(b)(5), under the deliberative process privilege. The withheld information consists of a substantive statement regarding the content of the draft study, and a statement regarding, in the sender’s view, the next steps relating to the draft study. The withheld materials are in an email from a DOE/NETL contractor to staff-level DOE and PNNL employees. The withheld materials are pre-decisional and deliberative and do not represent a final DOE determination or agency action; this email was sent in August 2023—over 15 months before the LNG export study was released in December 2024.</p> <p>Revealing statements regarding the content of the draft study would foreseeably harm DOE because it would have a chilling effect on the ability of DOE staff to have open and frank discussions about the content of future LNG export studies. The release of the sender’s opinion regarding next steps would also foreseeably harm DOE because it would prevent DOE from getting effective candid opinions from staff if they were concerned such information would be publicly revealed.</p> <p>DOE would withhold in part the transmittal email under Exemption 6, 5 U.S.C. § 552(b)(6). The information withheld under Exemption 6 consists of Francisco De La Chesnaye’s mobile telephone number. The information would not significantly contribute to the public’s understanding of the activities of the federal government and, if revealed, the information released would invade these</p>

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			<p>individuals’ privacy and the impact on those individuals’ privacy would outweigh any public benefit derived from the release of such information.</p> <p><b><i>Attachment:</i></b></p> <p>DOE would withhold in full the attached section of the draft study in Document 89 under Exemption 5, 5 U.S.C. § 552(b)(5), under the deliberative process privilege. The attachment is pre-decisional because it was precursor drafts to DOE’s final LNG export study released in December 2024. The draft study in Document 89 includes a draft LNG export study without visible comments or edits, but these drafts are still precursors to the final December 2024 study. These “clean versions” were sent to DOE, from NETL or its contractors, for DOE review. DOE subsequently returned the drafts with substantial edits. The latest-in-time draft study in the timeframe relevant timeframe to Plaintiff’s FOIA request—attachment in Document 81, sent October 27, 2023—includes extensive comments and edits.</p> <p>The withheld material amounted to pre-decisional communications between contractors and career level DOE staff without final decision-making authority. Those communications were made for the purpose of determining the potential scope and approach for assessing the impacts of LNG exports that would ultimately form an analysis to inform the agency’s ultimate determination as to whether further authorizations for the export of LNG to non-free-trade-agreement countries is consistent with the “public interest,” which is a policy judgment required by the Natural Gas Act. Many pre-decisional drafts of the LNG study, portions of the study, as well as briefing and options slides were circulated between career staff employees within DOE, staff employees at its National Laboratories, and DOE and NETL contractors. These draft studies are an essential part of DOE’s deliberative process in that individuals drafting and reviewing the documents make recommendations, evaluate and make choices on methodologies, debate scientific matters, or express opinions on policy issues related to the impacts of LNG exports. They include candid, internal discussions relating to various options deliberated among contractors and National Laboratory staff. The drafts are sent from NETL staff personnel to DOE staff-level personnel for DOE review. They include recommendations from career agency staff-level employees within FECM, the Office of the General Counsel, NETL, and PNNL.</p> <p>DOE would be foreseeably harmed if these drafts were released. If the candid views of staff contained in draft studies were disclosed, the quality of future internal deliberations on LNG export studies would suffer. The working drafts of the LNG export studies contain comments from staff-level personnel on matters related to complex analyses integral to the study of the economic and</p>
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			<p>environmental impacts of LNG exports. In my opinion, DOE, NETL, PNNL, and contractor personnel would hesitate to provide their frank and forthright opinions and recommendations on these draft documents based on fears that candid recommendations would be broadcast outside the executive branch and misunderstood outside of context. I believe that the disclosure of this material would significantly and adversely impair the integrity and quality of the decision making and drafting process for future LNG export studies. Additionally, release of these documents would create public confusion because these draft studies were never finalized, let alone adopted and released by DOE. The analysis and factual matters presented are not final and contain inaccuracies or outdated information. The draft studies significantly differ from the 2024 LNG Export Study released on December 17, 2024.</p>
<p>Document 94</p>	<p>9/6/2023</p>	<p>7:57 PM email from Francisco De La Chesnaye (DOE contractor) to Thomas Curry (FECM) and Amy Sweeney (FECM), with Matthew B. Jamieson (NETL), and others on copy.</p> <p>Attachment: Early version of a draft LNG export study. No comments but sent for DOE review.</p>	<p><b>Transmittal Email:</b></p> <p>DOE would withhold in part the transmittal email in Document 94 under Exemption 5, 5 U.S.C. § 552(b)(5), under the deliberative process privilege. The withheld information consists of a statement regarding substantive edits that were made to the draft study, statements reflecting the sender’s opinion of the state of the attached draft report, recommended substantive edits to the draft study, and recommended future steps. The withheld materials are in an email from a DOE/NETL contractor to staff-level DOE, NETL, and PNNL employees. The withheld materials are pre-decisional and deliberative and do not represent a final DOE determination or agency action; the most recent email in the chain was sent in September 2023—over 15 months before the LNG export study was released in December 2024.</p> <p>Revealing statements regarding prior and recommended edits to the study and prior and future next steps would foreseeably harm DOE because it would have a chilling effect on the ability of DOE staff to have open and frank discussions about the drafting of future LNG export studies. The release of this information would also foreseeably harm DOE because it would prevent DOE from getting effective candid opinions from staff if they were concerned such information would be publicly revealed.</p> <p>DOE would withhold in part the transmittal email under Exemption 6, 5 U.S.C. § 552(b)(6). The information withheld under Exemption 6 consists of Francisco De La Chesnaye’s mobile telephone number. The information would not significantly contribute to the public’s understanding of the activities of the federal government and, if revealed, the information released would invade these individuals’ privacy and the impact on those individuals’ privacy would outweigh any public benefit derived from the release of such information.</p>

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			<p><b>Attachment:</b></p> <p>DOE would withhold in full the attached section of the draft study in Document 94 under Exemption 5, 5 U.S.C. § 552(b)(5), under the deliberative process privilege. The attachment is pre-decisional because it was precursor drafts to DOE’s final LNG export study released in December 2024. The draft study in Document 94 includes a draft LNG export study without visible comments or edits, but these drafts are still precursors to the final December 2024 study. These “clean versions” were sent to DOE, from NETL or its contractors, for DOE review. DOE subsequently returned the drafts with substantial edits. The latest-in-time draft study in the timeframe relevant timeframe to Plaintiff’s FOIA request—attachment in Document 81, sent October 27, 2023—includes extensive comments and edits.</p> <p>The withheld material amounted to pre-decisional communications between contractors and career level DOE staff without final decision-making authority. Those communications were made for the purpose of determining the potential scope and approach for assessing the impacts of LNG exports that would ultimately form an analysis to inform the agency’s ultimate determination as to whether further authorizations for the export of LNG to non-free-trade-agreement countries is consistent with the “public interest,” which is a policy judgment required by the Natural Gas Act. Many pre-decisional drafts of the LNG study, portions of the study, as well as briefing and options slides were circulated between career staff employees within DOE, staff employees at its National Laboratories, and DOE and NETL contractors. These draft studies are an essential part of DOE’s deliberative process in that individuals drafting and reviewing the documents make recommendations, evaluate and make choices on methodologies, debate scientific matters, or express opinions on policy issues related to the impacts of LNG exports. They include candid, internal discussions relating to various options deliberated among contractors and National Laboratory staff. The drafts are sent from NETL staff personnel to DOE staff-level personnel for DOE review. They include recommendations from career agency staff-level employees within FECM, the Office of the General Counsel, NETL, and PNNL.</p> <p>DOE would be foreseeably harmed if these drafts were released. If the candid views of staff contained in draft studies were disclosed, the quality of future internal deliberations on LNG export studies would suffer. The working drafts of the LNG export studies contain comments from staff-level personnel on matters related to complex analyses integral to the study of the economic and environmental impacts of LNG exports. In my opinion, DOE, NETL, PNNL, and contractor personnel would hesitate to provide their frank and forthright opinions and recommendations on these draft</p>
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			documents based on fears that candid recommendations would be broadcast outside the executive branch and misunderstood outside of context. I believe that the disclosure of this material would significantly and adversely impair the integrity and quality of the decision making and drafting process for future LNG export studies. Additionally, release of these documents would create public confusion because these draft studies were never finalized, let alone adopted and released by DOE. The analysis and factual matters presented are not final and contain inaccuracies or outdated information. The draft studies significantly differ from the 2024 LNG Export Study released on December 17, 2024.
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