

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

GOVERNMENT ACCOUNTABILITY &
OVERSIGHT,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF
ENERGY,

Defendant.

Civil Action No. 24-1829 (RDM)
[Lead Case]

SUPPLEMENTAL DECLARATION OF AMY R. SWEENEY

I, Amy R. Sweeney, hereby declare as follows:

1. My name is Amy R. Sweeney. I am employed by the United States Department of Energy (“DOE”) and my current job title is Director of the Office of Regulation, Analysis, and Engagement, within the Office of Resource Sustainability, which is part of DOE’s Office of Fossil Energy and Carbon Management (“FECM”), formerly the Office of Fossil Energy. In my role, my responsibilities include oversight of three divisions, one of which is focused on analysis.

2. The statements contained in this declaration are based upon my personal knowledge, upon information provided to me and learned by me in my official capacity, and upon conclusions and determinations reached and made in accordance therewith.

3. DOE routinely updates its liquefied natural gas (“LNG”) export studies that inform its public interest analysis under Section 3(a) of the Natural Gas Act. *See generally* ECF No. 33-3 ¶¶ 5-10. DOE has published and released LNG export studies in 2012, 2014, 2015, 2018, 2019, and most recently in 2024. In 2023, there were materials being developed that were part of an ongoing process to update DOE’s most current LNG export studies at the time. The final product

that continued to be developed and grew out of these early materials was a study released by DOE on December 17, 2024 (“2024 LNG Export Study”). As such, the LNG export study drafts created in 2023 were precursors to the 2024 LNG Export Study.

4. The discussions and analysis in the 2023 materials were greatly revised, as evidenced by the relatively little overlap between the draft studies and the 2024 LNG export study. *See* ECF No. 33-3 ¶ 25. However, the 2024 LNG Export Study involves the same subject matter and built off the materials that were initially prepared in 2023. In other words, some of the ideas expressed in the early drafts did not come to fruition and are not found in the Department’s final 2024 study.

5. Additionally, as I explained in my first declaration, drafting these studies included a multi-faceted modeling effort, with each component undergoing several rounds of rigorous review. In the nearly two years leading up to the issuance of the final 2024 study, DOE, NETL, PNNL, and contractors with OnLocation met routinely, both in person and over the phone, and exchanged many emails. DOE, NETL, PNNL, and several contractors participated in frank, open discussions during this period, and multiple options for the LNG export studies were considered and reconsidered, with many ideas and suggestions being rejected throughout this process. Accordingly, the draft studies attached to the emails in Documents 26, 31, 34, 56, 81, 87, 89, and 94 were created before the emails transmitting them were sent. Regardless of the exact creation date as compared to each attachment’s transmittal email, all of the attachments in Documents 26, 31, 34, 56, 81, 87, 89, and 94 were created before December 2024, when the agency’s multi-year analytic considerations culminated in the issuance of the final 2024 study.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 11th day of February 2025, Washington, D.C.

Amy R. Sweeney Digitally signed by Amy R.
Sweeney
Date: 2025.02.11 11:46:36 -05'00'

Amy R. Sweeney