

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Strom, Inc.

Docket No. CP14-121-000

MOTION FOR LEAVE TO INTERVENE AND COMMENTS OF
FLORIDIAN NATURAL GAS STORAGE COMPANY, LLC

On March 24, 2014, Strom, Inc. (Strom) filed a Petition for a Declaratory Order (Petition), requesting that the Federal Energy Regulatory Commission (Commission or FERC) issue an order declaring that Strom's proposed use of a new portable technology to convert natural gas to liquefied natural gas (LNG), called "LNG in a Box" (LNG/B), for use by U.S. corporations and for export to foreign nations is not subject to FERC jurisdiction under the Natural Gas Act (NGA) as an LNG terminal or as a natural gas facility. Floridian Natural Gas Storage Company, LLC (FGS) hereby moves for leave to intervene in this proceeding and submits its comments on Strom's Petition pursuant to the Commission's March 27, 2014 Notice of the Petition and Rules 211 and 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. §§ 385.211 and 385.214.

All communications with respect to this matter should be served on the following persons:

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Motion for Leave to Intervene

Floridian Natural Gas Storage Company, LLC, a Delaware limited liability company, has its principal place of business located at 1000 Louisiana Street, Suite 4300, Houston, TX 77002. FGS holds a certificate of public convenience and necessity under NGA Section 7(c) issued in FERC Docket No. 08-13-000 on August 29, 2008 and amended in Docket No. CP12-100-000 on August 31, 2012. That certificate authorizes FGS to construct and operate a new natural gas liquefaction, storage, vaporization and truck loading facility near Indiantown in Martin County, Florida.

Strom states that its LNG/B projects will be limited to the State of Florida and that its potential sites include Indiantown, FL (Petition at 2). FGS, as the developer of a FERC-regulated natural gas liquefaction facility located in Indiantown, FL, has a substantial interest that may be affected by the outcome of this proceeding. FGS's interest cannot be adequately represented or protected by any other party. FGS's participation in this proceeding is therefore in the public interest.

Comments

FGS submits that the Petition does not contain sufficient factual information for FGS to be responsive in a meaningful way. To the extent that Strom's Petition can be read to be requesting a disclaimer of Commission NGA jurisdiction for reasons similar to those set forth by Emera CNG, LLC in its Petition for a Declaratory Order filed on March 19, 2014 in FERC

Docket No. CP14-114-000, FGS adopts by reference in this proceeding its Motion to Intervene and Comments filed on this date in the Emera docket.

Dated: April 18, 2014

Respectfully submitted,

/s/ Beth L. Webb

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Counsel to Floridian Natural Gas Storage
Company, LLC

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion for Leave to Intervene and Comments of Floridian Natural Gas Storage Company, LLC has been served by email this 18th day of April, 2014 on the Petitioner Strom, Inc. (deanwallace@hotmail.com and mlokey@stromsolutions.com).

/s/ Joan M. Darby _____