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FERC Is Considering a Blanket Authorization Program for LNG Facilities

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On November 20, 2025, the Federal Energy Regulatory Commission (FERC) issued a Notice of Inquiry (NOI) seeking stakeholder input on whether and how to establish streamlined, blanket authorization procedures for certain activities at LNG plants. The NOI invites comments on revising FERC's regulations to allow LNG plant operators to undertake specific construction, expansion, and operational activities without case-specific orders under sections 3 or 7 of the Natural Gas Act (NGA).

Background

FERC has maintained a blanket certificate program for interstate natural gas pipelines under NGA Section 7 since 1982. This program increases flexibility and reduces regulatory burdens for most interstate pipelines by allowing pipeline operators to perform certain routine activities without individual authorization, provided they meet regulatory requirements and cost limits. However, in the past, FERC declined to extend blanket authorization to LNG plants, citing environmental and security concerns and highlighting the non-routine nature of LNG projects at the time.

Summary of the NOI

The Commission believes circumstances have changed. As the NOI states, "[t]he Commission's experience with LNG facilities in the United States has changed considerably since the [prior] rulemakings." The NOI also notes that the LNG industry has matured, gaining experience with the engineering, environmental, safety, and security issues at LNG plants, and the Commission has gained extensive experience evaluating LNG projects and coordinating with other agencies on issues involving LNG plants. Based on these experiences, the Commission appears open to implementing a blanket certificate program for LNG facilities.

FERC is seeking comments on five broad issue areas, including:

1. The process FERC should follow for issuing potential blanket authorizations;
2. Which activities should be eligible under the blanket certificate program;
3. How LNG operators should be required to demonstrate compliance with the blanket certificate program;
4. How the blanket certificate program would interact with other laws; and
5. Cost impacts of implementing such a program.

Comments are due **60 days** after publication of the NOI in the Federal Register.

Implications

This NOI is significant given the rapid growth of the U.S. LNG sector. There are currently eight LNG export terminals in operation, eight under construction, 10 more approved but not yet built, and several pending applications. Establishing a blanket authorization program for LNG facilities could expedite certain modifications and expansions, reduce regulatory burdens, and provide greater certainty for project developers. Streamlined procedures may help the U.S. maintain its competitive edge in global LNG markets while ensuring continued oversight of safety and environmental protections.

The details of the potential LNG blanket certificate program have yet to be determined. However, the NOI cites to the existing interstate natural gas pipeline blanket certificate program, which can likely be used as guidance. Commissioner See recently stated that it was one of her "top priorities" to "[d]evelop[] an expedited and statutorily sound [blanket] program for LNG terminals."

For More Information

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