No. 24-0116

IN THE
Supreme Court of Texas

PORT ARTHUR COMMUNITY ACTION NETWORK,

Petitioner,

v.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY; and JON NIERMANN, in his official capacity as CHAIRPERSON OF THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY,

Respondents,

PORT ARTHUR LNG, LLC,

Intervenor–Respondent.

On Certified Question from the United States Court of Appeals for the Fifth Circuit, No. 22-60556

Brief of the Chamber of Commerce of the United States of America as *Amicus Curiae* in Support of Respondents and Intervenor–Respondent

Michael J. Woodrum
State Bar No. 24121899
WINSTON & STRAWN LLP
2121 N. Pearl Street, Suite 900
Dallas, TX 75201

Jonathan D. Brightbill
Pro hac vice motion pending
WINSTON & STRAWN LLP
1901 L Street, N.W.
Washington D.C. 20006
Phone: (202) 282-5000
Fax: (202) 282-5100
jbrightbill@winston.com

Counsel for the Chamber of Commerce of the United States of America

SUPPLEMENTAL IDENTITY OF AMICUS CURIAE AND COUNSEL

Amicus Curiae	Chamber of Commerce of the United States of America
Counsel for Amicus Curiae	Jonathan D. Brightbill *Pro hac vice* motion pending WINSTON & STRAWN LLP 1901 L Street, N.W. Washington D.C. 20006 Phone: (202) 282-5000 Fax: (202) 282-5100 jbrightbill@winston.com Michael J. Woodrum State Bar No. 24121899 WINSTON & STRAWN LLP 2121 N. Pearl Street, Suite 900 Dallas, TX 75201 Phone: (214) 453-6500 Fax: (214) 453-6400 mwoodrum@winston.com

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STATEMENT OF INTEREST OF AMICUS CURIAE

The Chamber of Commerce of the United States of America is the world's largest business federation. It represents approximately 300,000 direct members and indirectly represents the interests of more than 3 million companies and professional organizations of every size, in every industry sector, and from every region of the country. An important function of the Chamber is to represent the interests of its members in matters before Congress, the Executive Branch, and the courts. To that end, the Chamber regularly files amicus curiae briefs in cases, like this one, that raise issues of concern to the nation's business community. Among other things, this case implicates the interest of Chamber members and the broader business community in a predictable and efficient permitting process. A stable, reliable permitting system supports and attracts the investment needed to grow and support the U.S. economy and our national security.

INTRODUCTION AND SUMMARY OF THE ARGUMENT[1]

A critical element of the economic success of Texas is a reasonable, predictable regulatory and permitting landscape. Businesses invest in Texas because Texas's laws and regulations give them the flexibility and certainty they need to do so, creating reasonable and predictable permitting processes that also promote environmental stewardship. The Texas economy in turn benefits from the infrastructure, employment, and economic activity that come with this investment.

The Texas Clean Air Act is part of that regulatory and permitting landscape. The Texas Clean Air Act requires new facilities subject to its permitting requirements to "use at least the best available control technology" to reduce emissions. TEX. HEALTH & SAFETY CODE § 382.0518(b)(1). Section 116.10(1) of Title 30 of the Texas Administrative Code requires that the best available control technology ("BACT") "has proven to be operational." Port Arthur LNG, LLC ("Port Arthur") and the Texas Commission on Environmental Quality ("TCEQ") both correctly interpret the phrase "proven to be operational" as meaning exactly what it says: the technology has already been verified to be actually operating. That

[1] *Amicus curiae* states that no counsel for any party authored this brief in whole or in part and no entity or person, aside from *amicus curiae*, its members, or its counsel, made any monetary contribution intended to fund the preparation or submission of this brief.

is the type of reasonable and predictable regulation that encourages businesses to invest in Texas and allows the state to thrive.

The Port Arthur Community Action Network ("PACAN") asks the Court to adopt a new reading of Texas law that would throw up roadblocks to a wide array of significant permitting decisions. PACAN suggests that aspirational emissions limitations, approved for use by permits at different facilities but not yet proven to operate as projected, should set the BACT limit for other permittees. PACAN's proposed interpretation deviates from the plain text of Section 116.10(1). And it creates regulatory uncertainties that would impose undue risks on all Texas businesses subject to TCEQ's permitting requirements.

Critically, although this case involves an LNG exporter, the Texas Clean Air Act applies to all stationary sources of emissions in Texas. These include electric plants, Portland cement plants, iron and steel mills, refineries, and petroleum storage and transfer units, to name a few. The increased procedural costs and enforcement risks resulting from PACAN's new interpretation would therefore affect great swaths of the Texas economy, creating new uncertainty and red tape that stifle investment. Nor is such an interpretation needed to continue development of new technologies for enhanced environmental protection over time. Many existing incentives

already encourage businesses to voluntarily adopt and pursue beyond-BACT standards.

PACAN's attempt to force unproven environmental controls on industry in Texas mirrors the U.S. Environmental Protection Agency's (EPA's) attempt to do the same on the federal level in the separate context of regulating emissions standards for electric generating units. Like the EPA power-plant rule, PACAN's interpretation of Texas law would impose fluid and costly burdens that go beyond the statutory requirements. The Court should reject PACAN's atextual interpretation of Section 116.10(1) and ensure that Texas businesses have the regulatory clarity and certainty they need to invest and operate.

ARGUMENT

I. Port Arthur LNG and TCEQ correctly interpret the phrase "proven to be operational" as meaning what it says.

The phrase "proven to be operational" requires actual proof of successful operation. 30 TEX. ADMIN. CODE § 116.10(1); *see* Port Arthur Br. at 23–24; *see also* TCEQ Br. at 44 ("Operational data demonstrating that a limit is achievable in practice will generally be dispositive evidence in the BACT analysis."). That may sound tautological, but there's not much more to be said when the phrase is so clear. "[P]roven to be operational" means that a standard is in operation, with evidence from actual operation to

confirm that the limits in question are achievable. *See* Port Arthur Br. at 23–24. An emission standard set forth in a permit for a facility that depends on a new or aspirational control technique—but not yet in operation and not yet shown to "be operational"—does not qualify. *See* TCEQ Br. at 38–42.

PACAN nevertheless asks the Court to deviate from the plain text of Section 116.10(1). It suggests that TCEQ should require unproven technologies and practices to establish emission standards under BACT so long as they are part of any existing permit—even if the facility in question is not yet operational. PACAN's proposed new interpretation of Texas regulations would create uncertainty for all businesses subject to the Texas Clean Air Act. It would inject undue costs into the permitting process and disincentivize new investment. And PACAN's strained interpretation ignores incentives already in place for businesses to voluntarily adopt beyond-BACT standards, which have successfully contributed to improving environmental control technologies over time.

A. PACAN's interpretation of the relevant Texas regulations would affect all businesses and industries seeking PSD permits in Texas.

Although this case involves a Prevention of Significant Deterioration ("PSD") permit for an LNG export facility, the interpretation adopted by this Court will apply to all businesses and industries seeking PSD permits in

Texas. The federal government and the states share responsibility for regulating air pollution. *See* Port Arthur Br. at 2–6; TCEQ Br. at 3–6. The federal government identifies pollutants and sets standards; the various states devise plans for implementing those standards. TCEQ Br. at 3 (citing *Texas v. EPA*, 829 F.3d 405, 411 (5th Cir. 2016)); Port Arthur Br. at 3–4 (citing 42 U.S.C. §§ 7408–7409).

The Texas Clean Air Act governs Texas's implementation of the federal emission standards. TEX. HEALTH & SAFETY CODE § 381.001, *et seq*. TCEQ has adopted rules to enforce the Act, including the PSD permitting program that governs the nitrogen oxide ("NOx") and carbon monoxide ("CO") emissions at issue here. *Id*. § 382.0518 (establishing PSD permit); *id*. § 382.017 (authorizing TCEQ to adopt rules); 30 TEX. ADMIN. CODE § 116.10. Consistent with federal requirements, Texas's PSD permitting program applies "to the construction of ***any*** new major stationary source" or "***any project*** at an existing major stationary source." 40 C.F.R. § 52.21(a)(2)(i) (emphases added).

A "major stationary source" is a facility that "emits, or has the potential to emit, 100 tons per year or more any regulated . . . pollutant," so long as it falls in one of the many categories enumerated in the rule, including steam electric plants, Kraft pulp mills, Portland cement plants, iron and steel mill

plants, primary copper smelters, municipal incinerators, petroleum refineries, lime plants, phosphate rock processing plants, fuel conversion plants, secondary metal production plants, chemical process plants, and glass fiber processing plants. *Id.* § 52.21(b)(1)(i)(a) (specifying further requirements for certain categories). The phrase "major stationary source" also includes any other facility "which emits, or has the potential to emit, 250 tons per or more of a regulated NSR pollutant." *Id.* § 52.21(b)(1)(i)(b).

Given the breadth of the term "major stationary source," the Court's answer to the Fifth Circuit's certified question will affect numerous aspects of Texas industry. The entire Texas economy would feel the ripple effect of deviating from the plain text of Section 116.10(1) and past TCEQ practice.

B. PACAN's interpretation would impose undue procedural costs and risks to the detriment of industry and development.

PACAN's proposal that any control technology in an issued permit would represent BACT—even if not yet proven to be operational—would impose unwarranted costs and risks on all Texas businesses seeking to obtain PSD permits. In particular, PACAN's proposed interpretation would mean that any permittee who agrees to control limits in a PSD permit thereafter sets the presumptive standard for all future permittees—even if the proposed

controls and techniques are aspirational and unproven and, ultimately, don't operate as assumed.

As discussed more fully below, *see, infra*, Section I.C., there are many reasons why an individual PSD applicant may voluntarily adopt beyond-BACT limitations that have not yet been proven in operation. Some applicants may hope to increase the likelihood of a permit being granted, rather than seek a permit with lower limitations and incur the risk and expense of negotiation or litigation. Other applicants may be motivated to meet the preferences of purchasers or other stakeholders, *infra*, section I.C.1, to secure the benefit of pursuing an amendment without having to give public notice, *infra*, section I.C.2, or to achieve the financial incentives provided by offset credits that may correspond to the conditions adopted in the permit, *id.* These considerations make clear that aspirational control technologies adopted in pending permits can be selected for reasons that have nothing to do with whether the technologies are proven to be operational.

PACAN's interpretation, however, would have those permits set the BACT standard. This could require any future PSD applicant with similar operations to explain why the unproven, aspirational, and not-yet-operational standard would not be "technically practical and economically

reasonable" at its facility. 30 TEX. ADMIN. CODE § 116.10(1). Future applicants would have to do so with little or no available data because the standard is not yet in operation.[2] A PSD applicant must submit documentation to show that the "facility or source will comply with all the applicable federal and state air-control statutes, rules, and regulations and the intent of [the Texas Clean Air Act]." TEX. HEALTH & SAFETY CODE § 382.0515. As part of this burden, the applicant must demonstrate to TCEQ that the proposed facility "will use at least the best available control technology, considering the technical practicability and economic reasonableness of reducing or eliminating emissions resulting from the facility." *Id.* § 382.0518; *see also* 30 TEX. ADMIN. CODE § 116.10(1) (adopting technical practicability and economic reasonableness into definition of BACT); *id.* § 116.111 (specifying that supporting documents must demonstrate compliance with BACT).

If aspirational control methods in permitted—but not yet proven to be operational—facilities established BACT, new applicants across a range of industries would be presumptively called on to analyze the "technical

[2] And it may be some time before operational data become available. The delays facing the Rio Grande LNG project illustrate this point. Indeed, on August 6, the D.C. Circuit vacated the Federal Energy Regulatory Commission's reauthorization of the construction of Rio Grande LNG's planned export terminal. Slip Op. at 4–6, *City of Port Isabel v. FERC*, No. 23-1174 (D.C. Cir. Aug. 6, 2024). Rio Grande LNG's application will now go back to FERC for further proceedings, adding delay. *See id.* at 34.

practicability and economic reasonableness" of those affirmatively *unproven* methods for their proposed permits. And new applicants could have little or no relevant information to use in preparing their permit applications. Because these control methods are not actually "operational"—as the regulation requires, 30 TEX. ADMIN. CODE § 116.10(1)—a future permittee could unfairly be forced to prove a negative.

PACAN's new interpretation would also add costs during the pendency of the application. Instead of assessing and then proposing control methodologies from then-existing and proven operations at similar facilities, applicants might arguably have to monitor for and then even rebut newly filed permits. For example, here, Rio Grande LNG voluntarily reduced its permit standards after TCEQ preliminarily approved Port Arthur's permit. Port Arthur Br. at 15–16. And PACAN informed Port Arthur of the revision the night before the PACAN-requested hearing before the administrative-law judges. *Id.*

In effect, PACAN's interpretation calls for Port Arthur and all PSD applicants to continuously search for new permits and then resubmit analyses to TCEQ based on the intervening permits of other applicants—even after submission of the application and even after preliminary approval. Such a fluid regulatory target would create vast uncertainty and significant

new ongoing procedural costs. TCEQ regulations do not require this. In fact, applicants currently have no obligation to update applications based on intervening developments, absent a deficiency notification from TCEQ. *See* 30 TEX. ADMIN. CODE §§ 116.110–127, 116.114(a), (b). So PACAN's proposed interpretation essentially buries a costly new procedural requirement in a definition that would undercut the express "safe harbor" that TCEQ has embedded in its regulations.

Inappropriately stringent BACT requirements would also expose permittees to greater risk of penalties once operating, including fines of up to $121,275 per violation and permanent or temporary injunctions. 88 Fed. Reg. at 89,312 (Dec. 27, 2023); 42 U.S.C. § 7413(b)(1). And citizens can bring enforcement suits to seek such remedies. 42 U.S.C. § 7604(a)(1). Thus, if an unproven, aspirational, and not-yet-operational technology sets the BACT standard—but ultimately proves not "technically practical and economically reasonable," 30 TEX. ADMIN. CODE § 116.10(1)—there could be significant monetary or injunctive consequences. In the face of these uncertainties, companies could well decline to invest in new projects for fear of having unproven, not-yet-operational technologies forced upon them.

Notably, if the Court were to adopt PACAN's interpretation, it would construe Texas law to impose burdens on businesses that not even California

imposes. While the majority of states simply adopt the federal definition of BACT, California—like Texas—elaborates further. It unequivocally requires BACT standards to be proven in practice. Before the California regulator can adopt aggressive BACT standards, it must "[d]etermine that the proposed emissions limitation has been met by production equipment, control equipment, or a process that is commercially available for sale, and has achieved the best available control technology in practice on a comparable commercial operation ***for at least one year***." CAL. HEALTH & SAFETY CODE § 40440.11 (emphasis added). California thus recognizes that it is unreasonable to require businesses to contend with unproven and aspirational emission controls simply because some other permittee has accepted them.

Of course, Texas recognizes this too. That is precisely why TCEQ adopted the definition of BACT that requires the standard be "proven to be operational." 30 TEX. ADMIN. CODE § 116.10(1). PACAN asks the Court to deviate from, not apply, that definition.

C. PACAN's justification for its novel rule ignores the current incentives for first adopters to voluntarily accept "beyond BACT" emission standards.

PACAN asserts that "Rio Grande LNG, and other permit applicants, presumably believe they will meet their permit limits lest they set themselves

up for perpetual enforcement actions." PACAN Br. at 40. But any such presumed belief does not mean that the technology and permit limits in question are "proven" to reduce and eliminate emissions while also remaining "technically practical and economically reasonable for [another] facility." *See* 30 TEX. ADMIN. CODE § 116.10(1).

In addition, PACAN's reasoning ignores the incentives for companies to voluntarily accept ambitious beyond-BACT standards, even if their operational effect is not yet "proven." These include both market and regulatory incentives, such as the possibility of future amendment, relief from notice-and-comment requirements, and access to tradable emission reduction credits. The existence of these incentives not only undermines the justification for PACAN's interpretation—these incentives also show that PACAN's interpretation is not necessary to ensure that Texas industry continues to make technological progress toward reducing future emissions.

1. The market incentivizes beyond-BACT standards.

Today's business environment and the broader market itself incentivize companies to adopt ambitious emissions-reduction technology above and beyond what government regulations might strictly require. That includes incentives from some foreign purchasers and environmental, social, and governance ("ESG") investors.

For example, certain European and Asian purchasers have asked American LNG exporters to adopt environmental standards over and above American regulation. *See* Jean Chemnick, *Why So Many LNG Terminals Are Adopting Carbon Capture*, E&ENews by Politico (Sept. 8, 2022). That trend is unlikely to change in the long term. *See, e.g.*, Ben Cahill, *Europe Wants Cleaner Gas. Can the United States Provide It?*, CSIS (June 5, 2023).

Meanwhile, ESG investors often encourage companies to adopt enhanced environmental standards. Kenneth B. Medlock, et al., *"Green LNG"—A Pathway for Natural Gas in an ESG Future?*, FORBES (Oct. 26, 2020). Prominent voices in ESG investing have identified the turbines of liquefaction trains as appropriate for emissions reduction efforts. *See Siemens Energy to Supply World's First Emissions-Reducing Gas/Electric Hybrid Drive System for an LNG Plant*, ESGNEWS (Oct. 20, 2022); *see also ESG Clean Energy Announces Positive Test Results of Patented Carbon Capture Water Removal System*, BUSINESSWIRE (Feb. 22, 2024).

2. TCEQ regulations incentivize beyond-BACT standards.

TCEQ's regulations include other incentives to facilitate company adoption of beyond-BACT standards. First, companies who adopt beyond-BACT standards might later seek to amend their permits upon a modification of a facility. *See* TEX. HEALTH & SAFETY CODE §§ 382.0518, 382.056; *see also*

30 TEX. ADMIN. CODE § 116.116(b).[3] A company might face requests from purchasers or investors to adopt beyond-BACT standards without knowing for certain whether it could achieve those standards in practice. *See, supra*, Section I.C.1. Nevertheless, the possibility of amendment can allow an entity to accept an aggressive beyond-BACT standard while knowing that it might seek to amend its permit later if the controls prove unworkable (whereas the same would not be true for a facility locked into a mandatory BACT standard).

Second, companies could include beyond-BACT standards in amendment applications to streamline the process by avoiding public-notice requirements. The Texas Health & Safety Code generally requires companies to provide notice to allow the public to participate in application proceedings (as PACAN did here). TEX. HEALTH & SAFETY CODE § 382.056. The Code exempts amendment applications from public-notice if "the total emissions increase from all facilities authorized under the amended permit will meet the de minimis criteria defined by commission rule and will not change in character." *Id.* § 382.0518(h). Adopting beyond-BACT standards could

[3] A company that seeks to amend its permit in this manner would likely be subject to public-notice requirements and compliance-history-reviews. *See* TEX. HEALTH & SAFETY CODE § 382.056; 30 TEX. ADMIN. CODE § 116.110(c); *see also id.* §§ 60.1, *et seq.*

allow a facility to expand operations while keeping the total emissions increase under the de minimis threshold.

Third, and perhaps most important, adopting beyond-BACT standards can secure tradable emission reduction credits for permittees located in areas designated as nonattainment areas (i.e., areas designated by EPA as not meeting certain air quality standards). Texas's emission reduction credit program "allow[s] the owner or operator of a facility or mobile source to generate emission credits by reducing emissions beyond the level required by any applicable local, state, or federal requirement and [] allow[s] the owner or operator of a facility or mobile source to use these credits." 30 TEX. ADMIN. CODE § 101.301; *see also id.* §§ 116.170, 116.174. Facilities can earn emissions reduction credits by, *inter alia*, "install[ing] and operat[ing] pollution control equipment that reduces emissions below baseline emissions for the facility," by "chang[ing] a manufacturing process that reduces emissions below baseline emissions for the facility," or by adopting "pollution prevention projects that produce surplus emission reductions." *Id.* § 101.303(a)(1)(B)–(C), (E).

Relevant here, emissions credits become enforceable by "amending or altering a new source review permit to reflect the emission reduction and set a new maximum allowable emission limit." 30 TEX. ADMIN. CODE

§ 101.303(d)(4). Thus, facility owners can secure credits by modifying a facility or operation method and then memorializing the resulting emissions reductions in a beyond-BACT permit amendment. *Id.*; *see also id.* § 101.300(26)(A). Facility owners can then freely sell the emissions credits at any time before they expire. *Id.* § 101.309. The emissions credit system creates an enticing financial incentive for facilities to voluntarily adopt beyond-BACT standards.

* * *

These features of the market and regulations demonstrate that companies have significant incentives to accept permit limitations and conditions over and above the minimum regulatory requirements. Endorsement of TCEQ's existing interpretation will not result—and has not resulted—in a stifling of technological advancement. Just the opposite. Policy considerations support applying the rule just as its text specifies, to require "proven" operational success that is "technically practical and economically reasonable."

II. PACAN's press for speculative BACT standards in Texas mirrors an analogous federal push for unproven emissions standards.

PACAN's request for a new BACT interpretation in Texas does not lie in a vacuum. Rather, it mirrors a recent effort by EPA to impose aggressive

and unproven regulatory standards on businesses despite governing statutory text. EPA's rule further underscores why a single, unproven emissions standard should not set a new industry baseline.

In May 2024, EPA promulgated a rule for emissions standards for new natural-gas-fired and existing coal-fired electric generating units. 89 Fed. Reg. 39,798 (May 9, 2024). EPA has statutory authority to regulate power plants by setting a "standard of performance" for their emission of pollutants. 42 U.S.C. § 7411(a)(1). EPA's chosen standard must be "achievable" and reflect the "best system of emission reduction" that EPA determines "has been adequately demonstrated." *Id.*

EPA's new rule nevertheless deviated from the "achievable" and "adequately demonstrated" requirements by adopting an unproven CO2-capture standard. EPA's rule would require the regulated electricity-generating facilities to achieve 90% CO2 capture by 2032. 89 Fed. Reg. at 39,802. EPA itself acknowledged that the 90% CO2 capture rate was not yet successfully implemented in practice. *Id.* at 39,830–31. Instead, it argued that the governing phrase "has been adequately demonstrated" does not require practical application but permits demonstration by a "test or study." *Id.* Twenty-five states, including Texas, and various private-sector parties

have petitioned for review of the rule in the D.C. Circuit. *See West Virginia v. EPA*, No. 24-1120 (D.C. Cir.).[4]

PACAN advances essentially the same atextual argument here by contending that research alone, without experience in practice, could establish BACT. PACAN Br. at 25. The operative language from Section 116.10(1)—"proven to be operational"—does not support that argument, as is also the case for the language governing the EPA rule. *Compare* 30 TEX. ADMIN. CODE § 116.10(1), *with* 42 U.S.C. § 7411(a)(1). Under both the EPA rule and PACAN's proposed interpretation of Texas law, businesses seeking permits would be required to comply with aspirational and unproven requirements.

At the national level, the one existing project relied on by EPA to assert that its new standards are achievable illustrates why a single, unproven

[4] The Chamber filed an amicus brief in support of several petitioners' motions to stay the rule pending review. Brief of the Chamber of Commerce of the United States of America as *Amicus Curiae* in Support of Petitioners' Motions for Stay Pending Review, *West Virginia v. EPA*, No. 24-1120 (May 30, 2024) ("Chamber Br."). The Chamber explained that among other things, the system of emissions reduction featured in the EPA rule "lacks any meaningful track record," contrary to the statute's requirements. *Id.* at 3, 5–11. After the D.C. Circuit denied the motions, the petitioners applied for a stay from the Supreme Court. *See, e.g.*, States' Emergency Application for an Immediate Stay of Administrative Action Pending Review in the D.C. Circuit, *West Virginia v. EPA*, No. 24A95 (July 23, 2024). The Chamber filed another amicus brief in support of the stay applications in the Supreme Court. Brief of the Chamber of Commerce of the United States of America as *Amicus Curiae* in Support of Applicants' Motions for Stay Pending Review, *West Virginia v. EPA*, No. 24A95 (Aug. 5, 2024). The stay motions remain pending as of this date.

example should not set an industry standard—whether for EPA's national program or for PSD permits here in Texas. *See* 89 Fed. Reg. at 39,848. EPA pointed to the SaskPower Boundary Dam Unit 3 and claimed that it was designed to achieve "CO2 capture rates of 90 percent." *Id*. But SaskPower admitted in its own comments on the EPA rule that—once operational—its "facility is not capturing 90 percent of emissions from Boundary Dam Unit 3." SaskPower Comment (Aug. 4, 2023), EPA-HQ-OAR-2023-0072-0687; *see* Chamber Br. at 6, *West Virginia v. EPA*, No. 24-1120 (D.C. Cir. May 30, 2024) (noting that Unit 3 achieved 90 percent CO2 capture on only a handful of days over a five-year period). Similarly, in this case PACAN relies on the Rio Grande LNG facility to justify the proposed 5 ppm NOx and 15 ppm CO emission rates. PACAN has no operational data whatsoever on the Rio Grande facility because it is not yet operational.

In sum, PACAN's interpretation would set up business and industry across Texas for risk, uncertainty, unnecessary expense, procedural complexity, and (ultimately) decreased investment. *See, supra*, Section I.B. The Court can avoid these negative consequences by simply interpreting the text of Section 116.10 as written.

CONCLUSION

The phrase "proven to be operational" means what it says: in operation with confirmation of that fact. The Court should adopt this clean, straightforward, and textually faithful interpretation of Section 116.10. Doing so would avoid imposing the uncertainty and undue costs that would flow inevitably from PACAN's proposed interpretation of Texas law.

August 30, 2024

Respectfully submitted,

/s/Jonathan D. Brightbill
Jonathan D. Brightbill
Pro hac vice motion pending
WINSTON & STRAWN LLP
1901 L Street, N.W.
Washington D.C. 20006
Phone: (202) 282-5000
Fax: (202) 282-5100
jbrightbill@winston.com

Michael J. Woodrum
State Bar No. 24121899
WINSTON & STRAWN LLP
2121 N. Pearl Street, Suite 900
Dallas, TX 75201
Phone: (214) 453-6500
Fax: (214) 453-6400
mwoodrum@winston.com

Counsel for the Chamber of Commerce of the United States of America

CERTIFICATE OF SERVICE

In compliance with Texas Rule of Appellate Procedure 11(d), I certify that this brief was served on counsel of record for all parties by e-mail on August 30, 2024.

/s/ Michael J. Woodrum
Michael J. Woodrum

CERTIFICATE OF COMPLIANCE

In compliance with Texas Rules of Appellate Procedure 9.4(i)(2) and 11(a), this brief contains 4,237 words, excluding the portions of the brief exempted by Rule 9.4(i)(1). This brief was prepared in 14-point, Georgia font.

/s/ Michael J. Woodrum
Michael J. Woodrum

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Bar No. 24121899
LFowler@winston.com
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Associated Case Party: Port Arthur Community Action Network

Name	BarNumber	Email	TimestampSubmitted	Status
Amy Dinn	24026801	adinn@lonestarlegal.org	8/30/2024 3:59:43 PM	SENT
Chase Porter	24102368	cporter@lonestarlegal.org	8/30/2024 3:59:43 PM	SENT
Caroline Crow	24118360	caroline.riviere.crow@gmail.com	8/30/2024 3:59:43 PM	SENT
Caroline Crow		ccrow@lonestarlegal.org	8/30/2024 3:59:43 PM	SENT
Ilan Levin		ilevin@environmentalintegrity.org	8/30/2024 3:59:43 PM	SENT
Joseph Welsh		jwelsh@lonestarlegal.org	8/30/2024 3:59:43 PM	SENT

Associated Case Party: Texas Commission on Environmental Quality

Name	BarNumber	Email	TimestampSubmitted	Status
Erin Snody	24093056	Erin.Snody@oag.texas.gov	8/30/2024 3:59:43 PM	SENT
Jessica Ahmed	24080756	jamberahmed@gmail.com	8/30/2024 3:59:43 PM	SENT
Maria Williamson		maria.williamson@oag.texas.gov	8/30/2024 3:59:43 PM	SENT
Lanora Pettit	24115221	lanora.pettit@oag.texas.gov	8/30/2024 3:59:43 PM	SENT
Sara Baumgardner		sara.baumgardner@oag.texas.gov	8/30/2024 3:59:43 PM	SENT
Aaron LNeilson		aaron.nielson@oag.texas.gov	8/30/2024 3:59:43 PM	SENT

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Aaron Streett	24037561	aaron.streett@bakerbotts.com	8/30/2024 3:59:43 PM	SENT
Derek McDonald	786101	derek.mcdonald@bakerbotts.com	8/30/2024 3:59:43 PM	SENT
Trevor Ezell	24109849	trevor.ezell@gov.texas.gov	8/30/2024 3:59:43 PM	SENT
Caroline Taylor		caroline.taylor@oag.texas.gov	8/30/2024 3:59:43 PM	SENT

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Case Contacts

Caroline Taylor		caroline.taylor@oag.texas.gov	8/30/2024 3:59:43 PM	SENT
Christopher BeauCarter		beau.carter@bakerbotts.com	8/30/2024 3:59:43 PM	SENT
David Laurent		david.laurent@oag.texas.gov	8/30/2024 3:59:43 PM	SENT
Z.W. JuliusChen		chenj@akingump.com	8/30/2024 3:59:43 PM	SENT
Martine E.Cicconi		mcicconi@akingump.com	8/30/2024 3:59:43 PM	SENT
Michael Weisbuch		mweisbuch@akingump.com	8/30/2024 3:59:43 PM	SENT
Houston Docket		ecf_houston@winston.com	8/30/2024 3:59:43 PM	SENT

Associated Case Party: Chamber of Commerce of the United States of America

Name	BarNumber	Email	TimestampSubmitted	Status
Michael Woodrum		mwoodrum@winston.com	8/30/2024 3:59:43 PM	SENT
Jonathan Brightbill		jbrightbill@winston.com	8/30/2024 3:59:43 PM	SENT
Michael Woodrum		mwoodrum@winston.com	8/30/2024 3:59:43 PM	SENT
Jonathan Brightbill		jbrightbill@winston.com	8/30/2024 3:59:43 PM	SENT