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September 14, 2023

Willie L. Philips, Acting Chairman
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Mark C. Christie, Commissioner
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Allison Clements, Commissioner
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

James Danly, Commissioner
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: GTN Xpress Project, Docket No. CP22-2-000

Dear Acting Chairman Phillips and Commissioners Christie, Clements, and Danly:

The Commission is charged by Congress under the Natural Gas Act (NGA) with approving new interstate natural gas facilities if they are found to be in the public interest. We write to express our view that, given a careful analysis of the evidence provided in Docket No. CP22-2-000, the proposed expansion of the GTN Xpress pipeline in our states does not meet this standard. We also conclude that, given projected future declines in natural gas demand, our region's existing pipeline capacity is more than adequate to serve the future needs of our consumers, businesses, and any new manufacturing opportunities.

Specifically, under Section 7 of the NGA, the Commission is directed to issue a Certificate of Public Convenience and Necessity to any qualified applicant upon finding that the construction and operation of a proposed project "is or will be required by the present or future public convenience and necessity." However, the public convenience and necessity standard encompasses all factors bearing on the public interest, and the Commission should not approve any application if, on balance, the full array of public interest factors weigh against authorization of the proposed project.

Our review of the GTN Xpress proposal found that it would likely saddle West Coast ratepayers with a substantial portion of project costs, even for customers that would not benefit from the project. Moreover, the total costs of expanding the pipeline appear to be obfuscated by the developer according to Motions to Intervene by two major utilities and other stakeholders, and may actually exceed the resulting revenues, which may benefit the pipeline owner but not the public. Finally, it appears GTN plans to recover project costs for several decades after our states have legally binding commitments to decarbonize, likely leaving a significantly diminished customer base to recover a concentrated level of outstanding project costs.

We are also concerned that, according to the Commission's November 2022 Final

Environmental Impact Statement (FEIS), the project will result in the release of approximately 1.9 million tons of carbon dioxide-equivalent emissions annually, which would represent a significant portion of the greenhouse gas emissions our three states plan to emit from all sources by mid-century. Notably this calculation does not take into account any final downstream emissions from product moved by one of the major entities contracted to utilize GTN capacity, nor the well-documented additional emissions associated with upstream natural gas production. The Commission's FEIS analysis also estimates that the social cost from the project's greenhouse gas emissions may be \$8.8 billion through 2050, far exceeding the predicted societal benefits, and also likely an underestimation due to the same calculation omissions.

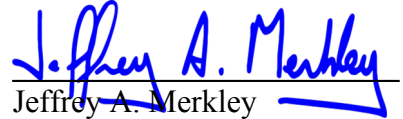
We appreciate the challenges the Commission faces in weighing the various costs and benefits of approving new interstate pipeline facilities. In this case, however, we believe it is clear that while this pipeline expansion may be in the interest of the applicant, it is not in the interest of the public we represent, nor the requirements of the NGA, and consequently should not be approved by the Commission.

Thank you for your consideration and we look forward to our continued collaboration.

Sincerely,



Maria Cantwell
United States Senator



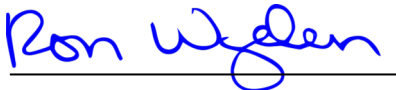
Jeffrey A. Merkley
United States Senator



Alex Padilla
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Dianne Feinstein
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