



STATE OF WASHINGTON
— OFFICE OF GOVERNOR JAY INSLEE —

March 10, 2023

Willie L. Philips
Acting Chairman
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Mark C. Christie
Commissioner
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Allison Clements
Commissioner
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

James Danly
Commissioner
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

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

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

I respectfully request the Commission reject the expansion of the Gas Transmission Northwest (GTN) Xpress pipeline. This project does not serve a public need or interest and evidence suggests it will harm consumers. Furthermore, it sharply conflicts with Washington state's efforts to reduce greenhouse gas emissions and transition to clean energy.

In my state, we are experiencing the impacts of climate change through increasing wildfires, drought, and flooding. Our state's economy and the health of our communities require ongoing bold action, and I am proud of the work we are doing to combat climate change.

Washington has a cap-and-invest program to reduce emissions consistent with our state's statutory greenhouse gas limits, and a commitment to achieve 100% clean electricity by 2045. We are investing hundreds of millions of dollars to jumpstart clean energy projects, clean up air pollution in overburdened communities and help residents access affordable clean transportation and energy. Expanding fracked gas through the GTN pipeline runs contrary to our climate goals, and risks further costly environmental harm to our state.

GTN plans to recover costs for the proposed pipeline expansion well past our state's transition to net-zero emissions. Those costs will increasingly burden the remaining customers and GTN may be unable to recover the costs, resulting in a stranded asset. To ensure reasonable rates for remaining customers, the Commission should account for the expected decline in gas sales and customers in our region as a result of our state laws.

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Renewable energy alternatives can meet public demand with fewer risks to the climate and consumers. Given the rapid development of renewable energy in the region, there is no reason to ignore such alternatives.

Finally, expanding GTN's pipeline is inconsistent with our state laws to address climate change. These laws are not abstract visions. They establish concrete deadlines and enforceable obligations to reduce our emissions. GTN's project ignores these laws and pushes in the wrong direction. To put GTN's project in context, the Attorneys General of Washington, California and Oregon presented evidence that, if GTN continues business as usual with its pipeline in 2050, it would represent 48 percent of the region's target greenhouse gas emissions *from all sources*. We need to plan for reduced consumption of gas from GTN's pipeline, not require consumers to fund millions of dollars to increase the pipeline's capacity.

If you have any questions, please contact Becky Kelley, Senior Policy Advisor for Climate, at becky.kelley@gov.wa.gov or 360-688-8149.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jay Inslee". The signature is fluid and cursive, with a large initial "J" and "I".

Jay Inslee Governor

cc: Bob Ferguson, Attorney General of Washington
Ellen Rosenblum, Attorney General of Oregon
Rob Bonta, Attorney General of California