

October 21, 2022

The Honorable Richard Glick Chairman Federal Energy Regulatory Commission 888 First Street, N.E. Washington, D.C. 20426

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

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

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

Dear Chairman Glick and Commissioners Danly, Clements, Christie, and Phillips,

We write to express our support for the Gas Transmission Northwest (GTN) Xpress project, docket number CP22-2. The GTN Xpress project will greatly expand the Pacific Northwest's regional transportation capacity of low-cost natural gas and must be completed without delay.

The GTN Xpress project will help meet growing demand for natural gas from residential, commercial, and industrial consumers in Idaho and in the rest of the Pacific Northwest by adding 150,000 dekatherms per day (Dth/d) of natural gas to the current GTN system. The project developer seeks to modify three existing compressor facilities at various points along the pipeline. These facility modifications will provide the needed energy transportation service with minimal, if any, impacts on landowners or the environment.

The Intermountain Gas Company (Intermountain), which serves more than 400,000 customers in 74 communities in Idaho, has executed a binding precedent agreement with the project sponsor to use over half of the project's new capacity for the next 30 years. The new capacity will help meet the natural gas needs of Intermountain's customer base, which is expected to grow by 2.8-

percent every year. The remaining percentage of the new project capacity has also been claimed by two other shippers with 30-year precedent agreements, clearly indicating region-wide public need.

We are aware of arguments that FERC should base its infrastructure determinations off of arbitrary "clean energy standards" adopted by Idaho's neighboring states. However, this would directly conflict with FERC's other recent proceedings. The commission concluded earlier this year that "claims that a project is not needed because of [state] legislation related to reducing GHG emissions are not sufficient to undermine [a] finding that [the applicant] has demonstrated a need for the project through a precedent agreement for 100% of the project."

It is clear FERC must implement the Natural Gas Act (NGA) as Congress intended, which, as the Supreme Court has held, is to "encourage the orderly development of plentiful supplies of ... natural gas at reasonable prices." FERC does not have the authority to abandon the NGA's mandate based on individual state policy goals. Attempts to use the NGA to impose individual state policy preferences on other states would be misguided and clearly conflict with observable, real-life need for additional pipeline capacity.

Given these legal considerations, the demonstration of clear market signals, and the need for low-cost, reliable energy, FERC must move quickly in the approval process for the GTN Xpress Project. GTN Xpress currently serves as a critical component of the Pacific Northwest's energy infrastructure, and this expansion presents a great opportunity to ensure continued service for years to come.

Sincerely,

James E. Risch

U.S. Senator

Mike Crapo

U.S. Senator

Brad Little

Governor of Idaho

Michael R. Simpson

Member of Congress

Russ Fulcher

Member of Congress