

United States Senate

WASHINGTON, DC 20510

December 16, 2022

The Honorable Richard Glick
Chairman
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 James Danly
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

The Honorable Willie Phillips
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 are writing to express our opposition to the Gas Transmission Northwest (GTN) Xpress project, docket number CP22-2 and to urge the Federal Energy Regulatory Commission (FERC) to reject TC Energy Corporation's (formerly TransCanada Corporation) application.

In order to reach a net-zero emissions economy by 2050, President Biden pledged to reduce greenhouse gas emissions by 50 to 52% by 2030, below 2005 levels. According to FERC's Final Environmental Impact Statement (FEIS), the project would emit 2.3 million metric tons of Carbon Dioxide equivalent emissions each year, until at least 2052. Your FEIS predicts the project will cause nine billion dollars in climate-related damage over the next 28 years. And that's with a methodology that systematically minimizes the pipeline's climate impacts. Adding new emissions through pipeline expansions like the GTN Xpress is incompatible with President Biden's pledge.

The International Energy Administration has been clear, "if governments are serious about the climate crisis, there can be no new investments in oil, gas and coal." Yet if built, the GTN Xpress would increase the capacity of TC Energy's pipeline by at least 150,000 Dth/D, and possible as much as 250,000 Dth/D. This proposed fossil gas pipeline expansion is incompatible with the United States global commitments to combat climate chaos.

Approving the GTN Xpress would also undermine efforts by Oregon to lead the fight against climate chaos. Oregon has enacted policies to reduce greenhouse gas emissions and move away from fossil gas, including making investments in renewable energy. Renewable alternatives can meet energy demands without the climate and safety risks caused by fossil fuels.

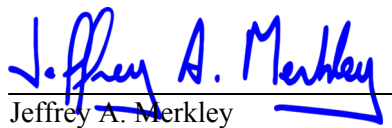
The GTN Xpress would risk the safety of frontline communities and the planet for a project that isn't necessary. FERC itself said in its FEIS that it cannot determine the end use for the 51,000 Dth/d that Tourmaline Marketing Corp has subscribed for, a clear indication that demand for the project is uncertain. Adding fossil gas infrastructure in a region that is rapidly transitioning to renewable energy risks sticking ratepayers with the costs of an underutilized project and it isn't in the public interest.

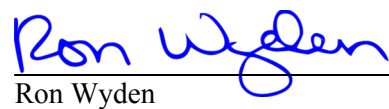
The FEIS illustrates flaws in FERC’s environmental reviews that lead to systemic undercounting of the climate impacts from pipeline projects. FERC discarded the established and growing body of peer-reviewed, academic literature indicating that supply side policies have an impact on greenhouse gas emissions by not even considering emissions from upstream production.¹ FERC also assumes that fossil gas will be completely combusted without fugitive emissions despite academic literature showing that leaks exist throughout the entire fossil gas supply and distribution chain. FERC’s methodology biases its analysis by minimizing the impacts that projects have on the climate.

In the FEIS, FERC disregarded the downstream emissions for fossil gas subscribed to by a Canadian fossil gas producer – a third of the total subscribed gas -- because FERC claims it is not “reasonably foreseeable” where the fossil gas would be used. FERC took this step despite the fact that no public comment on the DEIS even recommended it. FERC’s decision creates a perverse incentive for companies to hide the actual usages of their products in order to hide the full impacts of their project and is a deeply troubling practice.

We strongly urge FERC to listen to Oregon when it says that the GTN Xpress is incompatible with climate objectives and is not in the public interest. Expanding fossil gas through the GTN Xpress will undermine the efforts in Oregon to support a cleaner, safer, and effective alternative to fossil gas. Rather than helping Americans, GTN Xpress would be supporting a market for dirty fossil gas from a foreign country. We urge you to reject TC Energy’s application.

Sincerely,


 Jeffrey A. Merkley
 United States Senator


 Ron Wyden
 United States Senator

¹ See, e.g., technical analysis provided in Columbia Riverkeeper’s Motion to Intervene, Docket No. CP22-2-000, filed December 1, 2021; Brian C. Prest, *Partners, Not Rivals: The Power of Parallel Supply-Side and Demand-Side Climate Policy*, Resources for the Future (April 2022), available at https://media.rff.org/documents/Report_22-06.pdf; Erickson, P., Lazarus, M. and Piggot, G. *Limiting Fossil fuel Production as the Next Big Step in Climate Policy*, Nature Climate Change (November 2018), available at <http://doi.org/10.1038/s41558-018-0337-0>; Erickson, P., Lazarus, M. *Would Constraining US Fossil Fuel Production Affect Global CO2 Emissions? A Case Study of US Leasing Policy*, Climatic Change (February 2018), available at <https://doi.org/10.1007/s10584-018-2152-z>; Lorenzo Pellegrini, Murat Arsel, Martí Orta-Martínez, Carlos F. Mena, Gorka Muñoa, *Institutional Mechanisms to Keep Unburnable Fossil Fuel Reserves in the Soil*, Energy Policy (February 2021), available at <https://www.sciencedirect.com/science/article/pii/S0301421520307400?via%3Dihub>; Higham, C., and A. Koehl. *Domestic Limits to Fossil Fuel Production and Expansion in the G20*, Grantham Research Institute (October 2021), available at <https://www.lse.ac.uk/granthaminstitute/news/domestic-limits-to-fossil-fuel-production-and-expansion-in-the-g20/>.