

July 16, 2026

Washington State Department of Ecology
P.O. Box 47600
Olympia, WA 98504

RE: SEPA Review – Williams Huntingdon Connector Project

To Whom It May Concern:

The Northwest Gas Association (NWGA) appreciates the opportunity to provide comments regarding the State Environmental Policy Act (SEPA) review of the proposed Huntingdon Connector Project.

NWGA represents the region's natural gas utilities and transmission companies that provide safe, reliable, and affordable energy service to approximately 3.7 million households and 350,000 businesses throughout Washington, Oregon, Idaho, and British Columbia. Our members are committed to supporting an energy system that maintains reliability and resource adequacy while minimizing environmental impacts and meeting the needs of customers and communities across the Pacific Northwest.

After reviewing the available project information, NWGA supports the Huntingdon Connector Project. In our view, the project represents a prudent investment in existing energy infrastructure that will strengthen regional reliability, resource adequacy, and resilience while minimizing environmental disturbance associated with new construction.

Importance of Resource Adequacy and Energy Reliability

The Pacific Northwest continues to experience increasing pressures on both the electric and natural gas systems. Growing demand for energy, electrification trends, and the retirement of dispatchable generating resources require policymakers and regulators to ensure that foundational energy infrastructure remains reliable and resilient.

Natural gas transmission infrastructure plays an essential role in regional resource adequacy by directly serving residential, commercial, and industrial consumers and by supporting electric generation resources during periods of peak demand and system stress. Information provided regarding the Huntingdon Connector Project indicates that a principal purpose of the project is to strengthen natural gas supply reliability at key delivery points, particularly during winter heating periods.

As the region's resource portfolio changes, adequacy planning must account not only for available generation but also for the infrastructure needed to deliver fuel when it is needed. Investments that improve the existing natural gas transportation network help maintain essential energy service across a wide range of operating conditions.

Preserving Resilience Through Energy System Diversity

The electric and natural gas systems are increasingly interconnected, and decisions affecting one system can have direct implications for the other. As electricity demand grows and the region relies on a changing mix of generation resources, natural gas infrastructure continues to provide critical support for peak demand, winter heating needs, and electric system balancing. Preserving complementary fuel pathways helps avoid overreliance on any single energy delivery system.

Fuel diversity is a core strength of a resilient energy system. Maintaining multiple dependable energy sources and infrastructure configurations supports resource adequacy, reduces the risk of cascading interruptions, and helps ensure that customers and critical services have access to energy during extreme weather, equipment outages, or broader system disruptions.

Relying on electric compression for critical natural gas transportation functions could introduce significant additional risk by adding new electric load to a system already experiencing peak-period stress. Electrifying compression also creates another dependency on electric generation and delivery infrastructure when those resources are constrained. Because this compressor function serves as a backbone component for compression across the broader Williams system, it should be protected to the greatest extent possible to preserve operational flexibility and maintain reliable natural gas delivery when the region needs it most.

Efficient Use of Existing Infrastructure

NWGA also notes that the project focuses on upgrading and modernizing existing facilities. By largely remaining within existing facility boundaries and operational footprints, the project can improve system performance while avoiding substantial new linear construction.

From a SEPA perspective, maximizing the use of existing infrastructure is a practical and environmentally responsible way to meet reliability needs while limiting potential impacts associated with greenfield development.

Public Interest Considerations

In evaluating the Huntingdon Connector Project, NWGA respectfully encourages the Department to consider the broader public interest benefits of reliable energy service, resource adequacy, and resilient infrastructure.

Reliable natural gas transportation infrastructure contributes to:

- The safe and dependable delivery of energy to residential, commercial, and industrial customers;
- The reliability of electric generation resources that depend upon natural gas fuel supply;
- Reduced risk of cascading failures between the natural gas and electric systems;
- Regional energy resilience during periods of peak demand and extreme weather; and
- The efficient operation of existing energy infrastructure throughout the Pacific Northwest.

Conclusion

The Pacific Northwest's energy challenge is becoming more complex, not less. Growing electricity demand, changing generation resources, electrification, extreme weather, and increasing interdependence between the gas and electric systems all make reliable energy-delivery infrastructure more important. The Huntingdon Connector is a targeted investment that can strengthen natural gas supply reliability, preserve operational flexibility, support the electric system, and improve regional resilience while making efficient use of existing infrastructure.

For the foregoing reasons, NWGA supports the Huntingdon Connector Project and respectfully encourages the Washington State Department of Ecology to recognize the project's significant reliability, resiliency, and resource adequacy benefits as part of its SEPA review.

Thank you for your consideration of these comments.

Respectfully submitted,



Kelly Fukai

Chief Executive Officer

Northwest Gas Association (NWGA)

509-666-1457

kfukai@nwga.org