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July 16, 2026

Washington State Department of Ecology

PO Box 47600

Olympia, WA 98504

RE: SEPA Review – Williams Huntingdon Connector Project

To Whom it May Concern:

The membership of the Association of Washington Business (AWB) appreciates the opportunity to provide feedback on the State Environmental Policy Act (SEPA) review of the proposed Huntingdon Connector Project. AWB is the Washington States oldest and largest business organization, representing the broader business community. 90% of our member companies have 50 employees or fewer and we are committed to policies that advance community development and investment through economic growth and development.

The project represents a targeted, low-impact investment in existing energy infrastructure that strengthens grid reliability, helps manage energy costs for Washington businesses, and meets rigorous federal and state safety standards. This project is critical to ensuring that Washington businesses have access to reliable and safe energy.

Energy Infrastructure Resilience

Washington's business community depends on a stable, reliable supply of energy to operate, compete, and grow. The Huntingdon Connector Project directly supports that stability at a critical moment for our state's electric grid. Puget Sound Energy's retirement of Centralia Unit 2 and its exit from Colstrip Units 3 and 4, undertaken to comply with the Clean Energy Transformation Act,

has removed roughly 750 megawatts of dispatchable generating capacity from the region's portfolio. Because Centralia's planned conversion to natural gas is not expected to be operational until late 2028, this project's incremental firm gas transportation capacity is essential to keeping the lights on for homes and businesses in the interim.

The project is also designed to be in service by November 1, 2026, positioning the added capacity to serve the region through the coming winter heating season, when demand and system stress are at their highest. For businesses that depend on continuous power and heat to operate, this timing matters.

Just as importantly, the project achieves these reliability gains efficiently. All work occurs entirely within the existing right of ways for the four operating compressor stations in Whatcom, Skagit, Snohomish, and Pierce Counties. No new pipeline corridors, buildings, or greenfield sites are required, and excavation is limited to approximately 100 cubic yards at a single location. This project is being done with an incredibly low impact on the environment.

Cost Management

Reliable, adequately supplied energy infrastructure is directly tied to cost stability for Washington businesses, particularly the small and mid-sized companies that make up the large majority of our membership. Supply constraints and delivery bottlenecks during periods of peak demand drive price volatility that falls hardest on commercial and industrial ratepayers with the least ability to absorb it. These costs fall on top of a constant increase in energy costs for the state on both the electric and natural gas sides. This project is in the best interest of those ratepayers as it helps prevent additional cost increases.

The Project also delivers cost efficiencies on its own terms. By re-wheeling and upgrading existing compressor units rather than building new ones, Northwest Pipeline will be able to move the same or greater volumes of natural gas while burning less fuel per unit of throughput. Efficiency gains of

this kind reduce the operating cost of the system over time, a benefit that ultimately flows through to ratepayers. Making use of existing infrastructure, rather than pursuing new construction, likewise avoids the higher capital costs and longer permitting timelines associated with greenfield development.

Safety

AWB's members expect the energy infrastructure that powers their operations to meet the highest safety standards, and the record here supports that expectation. All facility modifications will be designed, constructed, tested, operated, and maintained to meet or exceed the requirements of 49 CFR Part 192 (federal pipeline safety standards) and 18 CFR 380.15, in addition to applicable state regulations.

The Project also reflects sound safety practice at the construction level. The limited excavation work planned at the Mt. Vernon Compressor Station will be conducted using non-invasive hydro-excavation techniques, further limiting environmental impacts. Construction activities will be governed by a comprehensive Spill Plan covering containment, emergency response, and notification procedures. And all four project sites have well-documented histories of environmental remediation under Ecology's Voluntary Cleanup Program, with the Project designed to avoid any disturbance to completed or ongoing cleanup work.

Conclusion

Washington's business community needs an energy system that is reliable, cost-effective, and safe. The Huntingdon Connector Project advances all three of these priorities by strengthening natural gas delivery capacity at a moment of real need for the region's grid, doing so through efficient use of existing infrastructure rather than new construction, and adhering to rigorous federal safety standards throughout design, construction, and operation.

For these reasons, AWB supports the Huntingdon Connector Project and respectfully encourages the Washington State Department of Ecology to recognize its reliability, cost, and safety benefits as part of its SEPA review.

Thank you for your consideration,

A handwritten signature in blue ink, reading "Peter Godlewski". The signature is fluid and cursive, with the first name "Peter" and last name "Godlewski" clearly distinguishable.

Peter Godlewski

Government Affairs Director for Energy Environment and Water

Association of Washington Business