

March 10, 2026

VIA E-FILING

Ms. Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101-2147

Re: Informational Notice of Planned Annual Average Capacity Increase on the Southern Lights Pipeline (Line 13)

**In the Matter of the Application of Enbridge Energy, Limited Partnership and Enbridge Pipelines (Southern Lights) LLC for a Certificate of Need for the Alberta Clipper Pipeline Project and Southern Lights Diluent Project
MPUC Docket No. PL-9/CN-07-465**

Dear Ms. Bergman:

Enbridge Pipelines (Southern Lights) L.L.C. (Enbridge) owns and operates Line 13, also referred to as the “Southern Lights Pipeline.” Enbridge provides this notice regarding its plans to increase the annual average capacity on Line 13 in Minnesota to an annual average capacity of 215,000 barrels per day (bpd). Because this change will be accomplished without construction in Minnesota, no approval or recertification is required. Alternatively, if the Minnesota Public Utilities Commission (Commission) determines that Minn. R. 7853.0800, subp. 3 applies, Enbridge respectfully requests the Commission confirm within the rule’s 45-day period that the proposed change is acceptable without recertification.

Background

Line 13 is a 16- to 20-inch diluent pipeline that originates in Manhattan, Illinois and terminates at Enbridge’s Edmonton Terminal, near Edmonton, Alberta. Line 13 primarily transports diluent.¹ In Minnesota, Line 13 is routed along the Enbridge Mainline Corridor.

Enbridge originally received a certificate of need (CN) from the Commission to build a 20-inch pipeline to transport crude oil from the North Dakota/Minnesota border to the Clearbrook Terminal on April 20, 1994.² Following approval, the new 20-inch outside diameter pipeline was placed in

¹ Diluent, also known as condensate, is a natural gas liquid used to blend heavy crude oil.

² Order Granting Certificate of Need, *In the Matter of the Application by Lakehead Pipe Line Company, Limited Partnership, for a Certificate of Need for a Large Petroleum Facility*, MPUC Docket No. PL-9/CN-93-1244 (April 20, 1994).

service on the existing Line 1 pipeline system, and the existing Line 1 18-inch pipe segment west of Clearbrook became the new Line 13.³

In 2008, Enbridge received a CN from the Commission to construct a 20-inch diluent pipeline from the Wisconsin/Minnesota border east to Clearbrook.⁴ At Clearbrook, the diluents would then flow into the existing 18-inch Line 13 pipeline, and the directional flow on that line would be reversed.⁵ At the time of the approval, the Southern Lights Pipeline had an approved annual average capacity of 180,000 bpd, and a design capacity of 200,000 bpd, with an expansion potential of up to 330,000 bpd with the addition of pumping facilities or horsepower.⁶

Proposed Annual Average Capacity Increase (No Minnesota Construction)

Enbridge plans to increase the annual average capacity on Line 13 to 215,000 bpd. This will not involve increases to the maximum operating pressure of Line 13. Enbridge has had ongoing engagement with shippers and industry regarding capacity on Line 13, and this proposed capacity increase is driven directly by increased customer demand for diluent on Line 13. Enbridge will be marketing the incremental capacity created by this increase in the near future and expects to utilize most or all of the incremental capacity shortly after confirmation that no additional approvals are required.

No construction will be completed in Minnesota. The increase will instead be accomplished through use of drag reducing agent (DRA) injected at skids already installed on the pipeline. DRA

³ Application for Certificate of Need for Lakehead Pipe Line Company, LLC *In the Matter of the Application by Lakehead Pipe Line Company, Limited Partnership, for a Certificate of Need for a Large Petroleum Facility*, MPUC Docket No. PL-9/CN-93-1244 (December 10, 1993) at Section 7853.0530 p. 2.

⁴ Order Granting Certificate of Need, *In the Matter of the Application of Enbridge Energy, Limited Partnership and Enbridge Pipelines (Southern Lights) LLC for a Certificate of Need for the Alberta Clipper Pipeline Project and Southern Lights Diluent Project*, MPUC Docket No. PL-9/CN-07-465 (December 29, 2008).

⁵ ALJ Report, *In the Matter of the Application of Enbridge Energy, Limited Partnership and Enbridge Pipelines (Southern Lights) LLC for a Certificate of Need for the Alberta Clipper Pipeline Project and Southern Lights Diluent Project*, MPUC Docket No. PL-9/CN-07-465 (July 17, 2007) at 39 (“107. At the Clearbrook Station, Enbridge proposed to connect the newly constructed line to an existing pipeline – known as Line 13. The pumping direction of Line 13 would then be reversed so as to permit the transportation of diluents north to an Enbridge terminal facility in Edmonton, Alberta, Canada. 108. The two projects together establish a pipeline circuit.”

⁶ Application for a Certificate of Need for a Crude Oil Pipeline, *In the Matter of the Application of Enbridge Energy, Limited Partnership and Enbridge Pipelines (Southern Lights) LLC for a Certificate of Need for the Alberta Clipper Pipeline Project and Southern Lights Diluent Project*, MPUC Docket No. PL-9/CN-07-465 (June 22, 2007), at Section 7853.0230 13.

use is a routine operational tool. Its use does not require any new pumps, pump stations, or other physical modifications in Minnesota.

Regulatory Framework

Under Minn. Stat. § 216B.243, subd. 2, absent an exemption, no large energy facility may be constructed without a CN from the Commission. “Construction” is defined as “significant physical alteration of a site to install or enlarge a large energy facility, but not including activities incident to preliminary engineering or environmental studies.”⁷ As stated above, the increased capacity will be accomplished without any significant physical alteration of any site and without installing or enlarging any facility in Minnesota. It will be accomplished, instead, through increased use of DRA. Accordingly, the change does not constitute “construction” and falls outside the Commission’s CN jurisdiction in Minn. Stat. § 216B.243.

For the same reason, the Commission’s rules requiring a CN for certain pipeline expansions are not triggered. Minn. R. 7853.0030(D) requires a CN for any project that, within a two-year period, would “expand an existing large petroleum pipeline in excess of either 20 percent of [the pipeline’s] rated capacity or 10,000 barrels per day, whichever is greater.” Here, there is no physical expansion of the pipeline, and no construction activity in Minnesota. Rather, Enbridge proposes to increase use of DRA. In addition, the requested annual average capacity of 215,000 bpd is not “in excess” of a 20 percent increase from the 180,000 bpd annual average capacity approved in 2008 (i.e., 216,000 bpd).

Minn. R. 7853.0800, subp. 2 states that facilities previously certified by the Commission do not need recertification for “capacity additions or subtractions of less than ten percent of the capacity approved by the commission.” Minn. R. 7853.0800, subp. 3 provides that “if an applicant determines that a change greater or other than those specified in subpart 2 is necessary or desirable, it shall inform the commission of the desired change, accompanied by a written statement detailing the reasons for the proposed change.” The Rule then provides the Commission with 45 days to notify the applicant whether the proposed change is acceptable without recertification. Out of an abundance of caution, Enbridge submits this notice pursuant to subp. 3 solely to inform the Commission; because the proposed change involves no Minnesota construction and does not trigger Minn. R. 7853.0030(D), recertification is not warranted.

Tribal Engagement

Enbridge regularly engages with tribal governments on its proposed projects, where applicable, to facilitate a shared understanding of mutual interests and potential project effects. Consistent with this practice, Enbridge shared information regarding this filing with tribal governments across its system. Attachment A contains letters from the Fond du Lac Band of Lake Superior Chippewa and Lac Courte Oreilles of Lake Superior Chippewa, each indicating no objection to the proposed capacity change. Enbridge is presently unaware of any tribal government objections to this proposed change.

⁷ Minn. R. 7853.0010, subp. 7.

Conclusion

Enbridge respectfully requests the Commission confirm that the proposed increase in capacity described in this notice is acceptable without recertification or other Commission approval.

Please direct any questions regarding this notice to me or Jacob Glass, Sr. Legal Counsel at Enbridge, at 952-607-3742 or Jacob.Glass@Enbridge.com.

This notice has been served on persons listed the official service list for this docket.

Sincerely,

FREDRIKSON & BYRON, P.A.

A handwritten signature in black ink, appearing to read 'CKB', with a long horizontal flourish extending to the right.

Christina K. Brusven
Direct Dial: (612) 492-7412
Email: cbrusven@fredlaw.com



ATTACHMENT A

Fond du Lac Band of Lake Superior Chippewa Reservation Business Committee

Chairman Bruce M. Savage Secretary/Treasurer Wayne Dupuis
District I Wally J. Dupuis District II Brad Blacketter District III Earl Otis

February 19, 2026

Minnesota Public Utilities Commission
121 7th Place E, Suite 350
Saint Paul, MN 55101-2147

To whom it may concern,

This letter confirms the Fond du Lac Band of Lake Superior Chippewa has no objection to Enbridge's request to increase the capacity of its Line 13, also known as the Southern Lights Pipeline through the Line 13 Expansion Project ("Project"). The Fond du Lac Band of Lake Superior Chippewa has a vested interest in this pipeline as it travels close to our Reservation and through our traditional territory.

Enbridge has met with our staff to review the details of the Project. Based on our discussions with Enbridge, our understanding of the Project and the fact that there are no major modifications planned for the pipeline, we do not have any objections to this request. Please feel free to contact us directly should the MPUC require any additional information.

Sincerely,

Bruce M. Savage
Chairman



Pride of the Ojibwe

13394 W Trepania Road . Hayward . Wisconsin . 54843
Phone 715-634-8934 . Fax 715-634-4797

March, 3, 2026

Minnesota Public Utilities Commission (“MPUC”)

To whom it may concern,

This letter confirms the Lac Courte Oreilles of Lake Superior Chippewa Indians has no objection to Enbridge’s request to increase the throughput of its Line 13, also known as the Southern Lights Pipeline through the Line 13 throughput Project (“Project”). The Lac Courte Oreilles of Lake Superior Chippewa Indians has a vested interest in this pipeline as it travels on fee land owned by the Lac Courte Oreilles of Lake Superior Chippewa Indians close to our Reservation and through our traditional territory.

Enbridge has met with our Tribal Council and staff to review the details of the Project. Based on our discussions with Enbridge, our understanding of the Project and the fact that there are no major modifications planned for the pipeline, we do not have any objections to this request. Please feel free to contact us directly should the MPUC require any additional information.

Sincerely,

Gary Clause
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Chairman

In the Matter of the Application of Enbridge Energy, Limited Partnership and Enbridge Pipelines (Southern Lights) LLC for a Certificate of Need for the Alberta Clipper Pipeline Project and Southern Lights Diluent Project

MPUC Docket No. PL-9/CN-07-465

CERTIFICATE OF SERVICE

Maia Martinez certifies that on the 10th day of March, 2026, she e-filed true and correct copy the following documents on behalf of Enbridge Pipelines (Southern Lights) LLC via eDockets (www.edockets.state.mn.us):

1. Notice of Capacity Expansion;
2. Attachment A - Fond du Lac Band of Lake Superior Chippewa and Lac Courte Oreilles of Lake Superior Chippewa Letters; and
3. Certificate of Service.

Said documents were also served as designated on the Official Service Lists on file with the Minnesota Public Utilities Commission and as attached hereto.

Executed on: March 10, 2026

Signed: /s/ Maia Martinez

Fredrikson & Byron, P.A.
60 South Sixth Street
Suite 1500
Minneapolis, MN 55402

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	7-4651
2	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	7-4651
3	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	7-4651
4	Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.		7701 France Ave S Ste 600 Edina MN, 55435 United States	Electronic Service		No	7-4651
5	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		Yes	7-4651
6	John	Gasele	jgasele@fryberger.com	Fryberger Buchanan Smith & Frederick PA		700 Lonsdale Building 302 W Superior St Ste 700 Duluth MN, 55802 United States	Electronic Service		No	7-4651
7	Jacob	Glass	jacob.glass@enbridge.com	Enbridge		7701 France Ave S Edina MN, 55435 United States	Electronic Service		No	7-4651
8	Jon	Kingstad	kingstadlaw@pressenter.com	Law Firm of Jon Erik Kingstad		Lake Elmo Bank Bldg Ste 260 600 Inwood Ave N Oakdale MN, 55128 United States	Paper Service		No	7-4651
9	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		No	7-4651
10	John C.	Reinhardt		Laura A. Reinhardt		3552 26th Ave S Minneapolis MN, 55406 United States	Paper Service		No	7-4651
11	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	7-4651
12	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	7-4651
13	Jason	Risdall	jason.risdall@enbridge.com	Enbridge		11 East Superior St Suite 125 Duluth MN,	Electronic Service		No	7-4651

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55802 United States				
14	Jennifer	Smestad	jsmestad@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56538-0496 United States	Electronic Service		No	7-4651
15	Melissa	Turner	melissa.turner@enbridge.com	Enbridge		7701 France Ave S Edina MN, 55435 United States	Electronic Service		No	7-4651
16	Kevin	Walli	kwalli@fryberger.com	Fryberger, Buchanan, Smith & Frederick		380 St. Peter St Ste 710 St. Paul MN, 55102 United States	Electronic Service		No	7-4651