



**ENVIRONMENTAL LAW & POLICY CENTER**  
Protecting the Midwest's Environment and Natural Heritage

*Via eFiling*

May 31, 2019

Charley Bruce  
Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101

RE: Intervenor Friends of the Headwaters comment on Enbridge Energy's Application to Amend Line 3 Pipeline Routing Permit

***PUC Docket Number: PL9/PPL-15-137***

Dear Mr. Bruce:

This letter is in response to the Commission's Notice of Comment on Application to Amend Line 3 Pipeline Routing Permit dated May 10, 2019 in PUC Docket No. PL9/PPL-15-137.

Intervenor Friends of the Headwaters (FOH) first restates and incorporates all of its previous comments and arguments on the Line 3 routing permit. None of the modifications proposed address FOH's concerns. In addition, with the information provided, and with no environmental review of the modifications, it is impossible for FOH to ascertain whether these modifications will increase, decrease, or change any human or environmental impacts.

One other point. As the Commission knows, FOH and others have appealed the current routing permit to the Minnesota Court of Appeals, and that appeal is currently stayed pending the outcome of other appeals involving the PUC finding on the adequacy of the environmental impact statement (EIS) and, if necessary, the PUC's certificate of need decision. If the PUC decides to modify the routing permit, FOH requests that it clarify whether it intends to vacate the old routing permit and substitute a new one, or leave both route permits in place, or exactly which order it intends to be final and effective and appealable.

Thank you for your consideration.

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