

June 20, 2022

**Via Electronic Filing**

Mr. William Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
St. Paul, MN 55101-2147

Re: **In the Matter of the Decommissioning Trust Fund for the Enbridge Energy,  
Limited Partnership Line 3 Replacement Pipeline  
MPUC Docket No. PL-9/CN-21-823**

Dear Mr. Seuffert:

Enbridge Energy, Limited Partnership (“Enbridge”) submits these Reply Comments in response to the Minnesota Public Utilities Commission’s December 20, 2021 Notice of Comment Period in the above-referenced docket.

These Reply Comments have been e-filed today through [www.edockets.state.mn.us](http://www.edockets.state.mn.us). A copy of this filing is also being served upon the persons on the Official Service List of record. Please let me know if you have any questions regarding this filing.

Sincerely,

FREDRIKSON & BYRON, P.A.

*/s/ Christina K. Brusven*

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Commissioner  
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Commissioner

**In the Matter of the Decommissioning  
Trust Fund for the Enbridge Energy,  
Limited Partnership Line 3 Replacement  
Pipeline**

MPUC Docket No. PL-9/CN-21-823

**ENBRIDGE ENERGY, LIMITED PARTNERSHIP'S  
REPLY COMMENTS**

**INTRODUCTION**

Enbridge Energy, Limited Partnership (“Enbridge”) submits these reply comments in response to the Minnesota Public Utilities Commission’s (“Commission”) December 20, 2021, Notice of Comment Period concerning the Decommissioning Trust Fund for the Line 3 Replacement Pipeline (the “Decommissioning Trust Fund” or “Trust”). In Section I, Enbridge responds to comments concerning specific Decommissioning Trust Fund terms and conditions. Section II addresses comments concerning the decommissioning estimate and funding timeline, more specifically. Finally, Section III discusses comments concerning the Commission’s procedure in this docket. As discussed in further detail below, Enbridge continues to believe that its initial comments (“Initial Comments”) presented a decommissioning trust framework and terms that were both workable and consistent with the Commission’s prior orders.

**DISCUSSION**

**I. TERMS AND CONDITIONS OF TRUST**

**A. Consistency with Canadian trusts**

Commenters stated that the Trust should be consistent with pipeline abandonment trusts in Canada.<sup>1</sup> In response, Enbridge notes that the overall framework and terms and conditions identified in Enbridge's Initial Comments are consistent with this goal.<sup>2</sup>

**B. Beneficiary**

Under trust law in Minnesota (and elsewhere), the beneficiary of a trust is not simply a person or entity named as such in the trust document. The beneficiaries of a trust are those to whom distributions are made.<sup>3</sup> In its Initial Comments, Enbridge proposed that, consistent with other decommissioning funds, the beneficiary of the Decommissioning Trust Fund should be the entity that has the decommissioning obligations.<sup>4</sup> Enbridge provided sample language from its Canadian pipeline trust agreement and explained that the Trust Agreement would require that any disbursements be used to pay decommissioning expenses, and that the funds would be disbursed only with the approval of the Trustee. Thus, the Decommissioning Trust Fund could only be used to fund decommissioning obligations.

Other commenters proposed different beneficiaries. The Department of Commerce, Division of Energy Resources ("DOC-DER") states that "the beneficiary of the trust should be the state actor anticipated to handle the decommissioning."<sup>5</sup> DOC-DER further states that the beneficiary should have the right to approve and make changes to the trustee, approve the investment adviser, approve trust amendments, etc. However, DOC-DER does not identify a

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<sup>1</sup> Dyrdal Comments at 3; FOH Comments at 3.

<sup>2</sup> Enbridge Initial Comments at 7, 9, 12.

<sup>3</sup> See Minn. Stat. § 501C.0103 (c) and (m).

<sup>4</sup> Enbridge Initial Comments at 12.

<sup>5</sup> DOC-DER Comments at 5.

proposed beneficiary, noting that it is “complicated.”<sup>6</sup> Others commented that Trust beneficiaries should include landowners and/or the State of Minnesota.<sup>7</sup>

Enbridge understands that many of these comments are aimed at ensuring that landowners and the State are not ultimately financially responsible for decommissioning. However, designating landowners and/or the State as the beneficiary of the Decommissioning Trust Fund does not accomplish this purpose. Enbridge is legally obligated to decommission Line 93 under the Commission’s previous orders.<sup>8</sup> The purpose of the Trust is to ensure that funds are available at the time of decommissioning. Accordingly, it is essential that the beneficiary of the Trust be the entity responsible for completing the decommissioning activities. Absent unforeseen circumstances, Enbridge is that responsible entity. Using the language proposed by Enbridge from its Canadian abandonment trusts, if a third party ever became responsible for decommissioning in Enbridge’s place, that party would become the beneficiary.

More specifically, with respect to DOC-DER’s comments, no state actor is anticipated to handle the decommissioning of Line 93. The same is true for landowners. While no state entity or landowner is legally obligated to decommissioning Line 93, similarly, there is no state actor (or landowner) currently positioned to decommission a pipeline. As such, it would be unworkable to identify a state agency or landowner(s) as the beneficiary of the Decommissioning Trust Fund. DOC-DER refers to the PolyMet trust and notes that the Minnesota Department of Natural Resources (“MDNR”) is the beneficiary of that trust. There, unlike the Commission here, MDNR

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<sup>6</sup> DOC-DER Comments at 5-6.

<sup>7</sup> Dyrdal Comments at 2.

<sup>8</sup> *See, e.g.*, CN Order, at 35 (Sept. 5, 2018) (reissued May 1, 2020).

has jurisdiction, responsibility, and expertise over land reclamation after mining.<sup>9</sup> This is set forth in statute and further detailed in rules adopted pursuant to the Administrative Procedures Act. There is no similar authority or guidance for the Commission here such that the Commission would undertake the decommissioning of a crude oil pipeline some decades in the future.

Further, naming landowners as the beneficiary could have other unintended tax and trust administration results. Under state and federal tax law, if a trust is not classified as a “grantor trust” (i.e., a trust the assets of which are deemed to be owned by the settlor for income tax purposes), then distributions are deductible by the trust and taxable to the beneficiaries.<sup>10</sup> In addition, beneficiaries of a trust are entitled to trust accountings and other information relating to the administration of a trust.<sup>11</sup> The administrative burden and cost of these obligations for all land through which Line 93 passes would be immense.

Accordingly, Enbridge has proposed that the “Beneficiary” of the Trust be the entity which has the obligation to decommission Line 93. This is not a novel proposal—it is how the Canadian trusts are structured. This proposal also accomplishes the goals of ensuring that Line 93 is decommissioned by an entity with the appropriate expertise and that the fund would be available even if Enbridge no longer owns the pipeline. Thus, Enbridge’s proposal is consistent with the Commission’s orders and also responsive to the many commenters who wished to ensure funds would be available, regardless of pipeline ownership.

### **C. Choice of law / situs of trust**

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<sup>9</sup> Minn. Stat. § 93.44 (“[I]t is hereby declared to be the policy of this state to provide for the reclamation of certain lands hereafter subjected to the mining of metallic minerals or peat where such reclamation is necessary . . .”).

<sup>10</sup> IRC § 651.

<sup>11</sup> Minn. Stat. § 501C.0813.

Enbridge previously understood that the DOC-DER's position was that the Trust should be established under Minnesota law,<sup>12</sup> and, as such, undertook to identify Trust terms and conditions which were consistent with existing Minnesota law, explaining that other states' laws may provide more favorable tax treatment or creditor protections.<sup>13</sup> In its initial comments, DOC-DER now states that the Trust "need not necessarily include a choice-of-law provision or situs of Minnesota" and that designating another state "may avoid potential problems with Minnesota law and allow the trust to be both robust and consistent with existing law."<sup>14</sup>

One reason to use a situs and applicable law other than Minnesota for the Trust is creditor protection. Under Minnesota law, a creditor of the settlor of a trust "may reach the maximum amount that can be distributed to or for the settlor's benefit."<sup>15</sup> Here, because the Trust assets can be used to satisfy Enbridge's decommissioning liabilities, the assets could potentially be subject to claims of all of Enbridge's creditors. Under the laws of several other states, including South Dakota and Nevada, assets irrevocably transferred to a trust may be protected from creditor claims.<sup>16</sup>

Another drawback of Minnesota law is that the duration of a non-charitable Minnesota trust is limited to 90 years or 21 years after the death of an individual living when the trust was created.<sup>17</sup> The duration of a trust "created for a noncharitable purpose without a definite or definitely

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<sup>12</sup> DOC-DER Comments (June 20, 2018).

<sup>13</sup> Enbridge CN Modifications Compliance Filing, Attachment 3B at 3 (July 16, 2018).

<sup>14</sup> DOC-DER Comments at 4 fn.8.

<sup>15</sup> Minn. Stat. § 501C.0505.

<sup>16</sup> See S.D.C.L. § 55-16; N.R.S. Chapter 166.

<sup>17</sup> Minn. Stat. § 501A.01.

ascertainable beneficiary” is limited to 21 years.<sup>18</sup> The laws of South Dakota, Nevada, and several other states authorize much longer-term trusts.<sup>19</sup>

South Dakota law also allows the establishment of a perpetual trust that has no beneficiaries at all, but instead is established to accomplish a particular purpose.<sup>20</sup> The Trust could be established for the purpose of decommissioning Line 93.

#### **D. Other trust forms**

Some commenters referred to other trust agreements or forms, including that used for PolyMet<sup>21</sup> and the Bureau of Land Reclamation’s (“BLM”) mine reclamation cost estimates. Similarly, PEER commented that the Trust in this proceeding should be similar to decommissioning funds established for other infrastructure permitted by the Commission.<sup>22</sup>

As an initial matter, Enbridge notes that its proposed Decommissioning Trust Fund would be structured to be as similar as possible to the CER pipeline abandonment trusts in Canada. This is consistent with the Commission’s direction on this matter.<sup>23</sup> Further, the CER pipeline abandonment trusts in Canada have been vetted and are tailored to the same purpose as the Decommissioning Trust Fund here—the decommissioning of pipelines. There are, certainly, other forms of trust documents, but Enbridge submits that it would be most prudent to follow a structure that has already been successfully adopted for other pipelines, rather than trying to retrofit another agreement.

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<sup>18</sup> Minn. Stat. § 501C.0409(1).

<sup>19</sup> *See, e.g.*, S.D.C.L. § 43-5-8 (perpetual); N.R.S. § 111.1031 (365 years).

<sup>20</sup> S.D.C.L. § 55-1-20.

<sup>21</sup> DOC-DER Comments at 2; FOH Comments at 4.

<sup>22</sup> PEER Comments at 8.

<sup>23</sup> CN Order at 35.

More specifically, Enbridge previously addressed BLM in its Initial Comments and incorporates those comments again here.<sup>24</sup> With respect to the PolyMet financial assurance, Enbridge notes that its trust document is governed by a specific statute and rule (Minn. Stat. § 93.49 and Minn. R. 6132.1200), neither of which applies here.

With respect to PEER's comments about decommissioning funds for other infrastructure permitted by the Commission, Enbridge notes that, for large wind energy conversion facilities, Minn. R. 7854.0500, subp. 13 contains requirements regarding decommissioning costs and funds which an applicant must provide. There is no similar rule for pipelines. Further, Minn. R. 7854.0500, subp. 13 does not specify the financial assurance mechanism that must be used, and permittees have indicated they will use escrow, bond, letter of credit, etc.—not the form of trust fund contemplated here. Likewise, most permittees do not obtain this financial assurance until years after the project becomes operational. In this way, permittees are afforded some flexibility to select a decommissioning financial assurance that is suitable based on market conditions and other factors. Commenters have not advocated for similar flexibility in this case. These differences aside, wind permittees are required to reassess decommissioning costs every five years and update, as necessary; this is also what Enbridge proposes here.<sup>25</sup>

## **II. DECOMMISSIONING ESTIMATE**

### **A. Decommissioning estimate amount**

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<sup>24</sup> Enbridge Initial Comments at 12.

<sup>25</sup> Several commenters raised issues which are outside the scope of this proceeding. For example, one comment requested that the Commission allocate funds from the Trust to well-testing and that the Trust be divided to apply to other pipelines. *See Groeschl Comments*. Enbridge does not address comments outside the scope of this proceeding in these reply comments, but reserves the right to do so should the issues be again raised before the Commission.



DOC-DER recommended that the Commission require Enbridge to “engage an independent firm to evaluate the decommissioning cost estimate and provide detailed estimates in the record.”<sup>26</sup> Enbridge’s estimate relied on the response of a qualified, third party contractor as well as the robust stakeholder process used in Canada to establish methodologies for decommissioning trust estimates.

With respect to the amount to be ultimately funded in the Trust, some commenters referred to the \$1.5 billion included in DOC-DER’s prior comments.<sup>27</sup> DOC-DER’s prior comments were based upon a very rough estimate by a witness during the evidentiary hearing who specifically indicated that he was not an expert in the field. The estimate identified in Enbridge’s Initial Comments is based upon Enbridge’s 2018 estimate and has been adjusted for inflation. Further, because Enbridge proposes to update the decommissioning estimate every five years, this is not a “final” number and, instead, will be updated over time to reflect current conditions. Enbridge also notes that, like other commenters, it is important to Enbridge that the amount ultimately funded in the Decommissioning Trust Fund accurately represent the actual cost of decommissioning so that the appropriate funds are available at the time of decommissioning.

#### **B. Timeline for funding Trust**

In its Initial Comments, Enbridge proposed to fully fund the Trust by the end of the economic life of Line 93, which is stipulated, per contract, at 30 years.<sup>28</sup> Other commenters generally agreed that the Trust should be fully funded prior to the end of Line 93’s economic life. However, some commenters suggested different economic life spans. For example, Friends of the

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<sup>26</sup> DOC-DER Comments at 4.

<sup>27</sup> Dyrdal Comments at 2.

<sup>28</sup> Enbridge Initial Comments at 9-10.

Headwaters (“FOH”) referred to Enbridge’s current proposal before the Federal Energy Regulatory Commission (“FERC”) to identify an economic life for the Mainline System of 2040 and suggested that Line 93’s end of economic life is, similarly, 2040.<sup>29</sup> This is incorrect. Line 93 is a new pipeline and is subject to a stipulated agreement among Enbridge and its shippers regarding the pipeline’s economic life. Line 93 is *not* part of Enbridge’s current proposal before FERC. Further, Enbridge notes that its proposal before FERC is just that—a proposal. It has not yet been approved by FERC, and shippers oppose reducing the economic life of the Mainline System.

### III. COMMISSION PROCEDURE

#### A. Procedural milestones identified by DOC-DER

DOC-DER recommended that the Commission “establish a schedule for completing some of the milestones required for the Decommissioning Trust Fund.”<sup>30</sup> DOC-DER further stated that it is willing to participate in a tribal consultation regarding “access to trust funds for all necessary decommission and remediation work on both Tribal and State lands.”<sup>31</sup> Finally, DOC-DER stated generally that “a more thorough process than three rounds of comments will likely be needed to finalize the trust.”<sup>32</sup>

DOC-DER identified the following milestones:

DOC-DER Milestone	Enbridge Response
Finalize a decommissioning cost estimate	Enbridge previously submitted a decommissioning cost estimate and has submitted an updated estimate with its Initial Comments. Further, Enbridge proposes to update the estimate every five years.

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<sup>29</sup> FOH Comments at 1.

<sup>30</sup> DOC-DER Comments at 2-3.

<sup>31</sup> DOC-DER Comments at 3.

<sup>32</sup> DOC-DER Comments at 3.

<b>DOC-DER Milestone</b>	<b>Enbridge Response</b>
Identify and finalize contribution amounts and structure	This will be completed once the Commission issues an order approving the Decommissioning Trust Fund.
Identify the appropriate Trust beneficiary	As discussed in Section I herein, the Trust beneficiary should be identified in the Trust document as the entity with the decommissioning obligation. Structuring the Trust in this way would account for any change in ownership in the future.
Identify and establish a process for addressing future issues related to the Trust	Enbridge suggests that future amendments of the Trust be efiled in this docket so that the Commission is aware of material changes and can review, if needed, for consistency with prior orders.
Select a trustee	Enbridge has completed advanced negotiations to select a trustee and anticipates that the trustee would be formally selected once the Commission issues an order approving the Decommissioning Trust Fund. Importantly, it is likely that any prospective trustee will need to review the final Commission Order prior to agreeing to take on the role.
Negotiate and execute the trust agreement	Enbridge anticipates that the agreement would be executed after the Commission's order in this docket.
Establish an investment policy for Trust funds	Given the expertise involved in development of an investment policy, Enbridge anticipates that an independent investment advisor will be engaged to develop the investment policy and ensure the appropriate parameters for investment are met. Minnesota's Prudent Investor Act, Minn. Stat. § 501C.0901, requires that the trustee of a trust "invest and manage trust assets as a prudent investor would, by considering the purposes, terms, distribution requirements, and other circumstances of the trust." Due to the size and nature of this Trust, Enbridge anticipates that the trustee will want to be directed as to investments by an investment trust advisor (who will be subject to the same duty), as authorized by Minn. Stat. § 501C.0808.
Forecast investment returns and income taxes to establish annual collection amount for funding plan	The annual collection amount will be determined following a methodology similar to the one used for the CER decommissioning trusts following issuance of the Commission's order in this docket.
Tribal consultation	Enbridge defers to the Commission's discretion regarding further consultation.

**B. Trust document**

Citing the “complexity of the terms and conditions” of the proposed Trust, DOC-DER recommends that the Commission require Enbridge to “propose a draft trust document” to which DOC-DER and other participants can propose changes, with the final Trust document subject to Commission approval.<sup>33</sup> DOC-DER’s recommendation that the specific language of the Trust document be revised and negotiated in this docket is unworkable given that the Trust agreement must be negotiated and acceptable to a trustee institution. Moreover, any additional direction provided by the Commission as to the terms and conditions that must be included will obviously influence the final language of the Trust agreement.

**C. Notice**

Several commenters requested that the Commission provide additional notice regarding this docket, particularly to landowners along Line 93.<sup>34</sup> Enbridge generally defers to the Commission’s discretion regarding appropriate notice.

**D. Contested Case**

Several commenters requested that the Commission refer this matter to a contested case proceeding.<sup>35</sup> As relevant here, the Commission may refer a matter to the Office of Administrative Hearings (“OAH”) for a contested case proceeding if the Commission determines that “all significant issues have not been resolved to its satisfaction.”<sup>36</sup> Similarly, the Minnesota Supreme Court recently explained that “it is not enough to raise questions, pose alternatives, or identify

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<sup>33</sup> DOC-DER Comments at 5.

<sup>34</sup> *E.g.*, D. Gaither Comments; Groeschl Comments; Honor the Earth Comments at 1.

<sup>35</sup> D. Gaither Comments; J. Gaither Comments; Honor the Earth Comments at 1.

<sup>36</sup> Minn. R. 7829.1000.

evidence of beneficial alternatives to merit a contested case hearing.”<sup>37</sup> The commenters requesting a contested case proceeding did not refer to the applicable legal standard or explain, specifically, what issues should be referred to a contested case proceeding.

**E. Timing for establishment and funding of Trust**

Commenters generally agreed that establishment and funding of the Trust should occur expeditiously.<sup>38</sup> As detailed in Enbridge’s Initial Comments, Enbridge proposes to begin funding the Decommissioning Trust Fund on May 10 of the first calendar year following the issuance of the Commission’s final written order approving the establishment of the Decommissioning Trust Fund.<sup>39</sup> Assuming that the Commission proceeds to a final decision following the close of the existing, established comment periods, Enbridge anticipates the Decommissioning Trust Fund could be established May 10, 2023.

**CONCLUSION**

Enbridge appreciates the opportunity to provide these reply comments and respectfully submits that the decommissioning trust framework and terms presented herein and in Enbridge’s Initial Comments are consistent with and responsive to the Commission’s prior orders on this issue.

Dated: June 20, 2022

Respectfully submitted,

/s/ Christina K. Brusven

Christina K. Brusven (# 0388226)

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**FREDRIKSON & BYRON, P.A.**

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<sup>37</sup> *In the Matter of the NorthMet Project Permit to Mine Application*, 959 N.W.2d 731, 746 (Minn. 2021).

<sup>38</sup> *E.g.*, PEER Comments at 1; FOH Comments at 2.

<sup>39</sup> Enbridge Initial Comments at 10.

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**In the Matter of the Decommissioning  
Trust Fund for the Enbridge Energy,  
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Pipeline**

**MPUC Docket No. PL-9/CN-21-823**

**CERTIFICATE OF SERVICE**

Breann L. Jurek certifies that on the 20<sup>th</sup> day of June 2022, she e-filed true and correct copy of Enbridge Energy, Limited Partnership's Reply Comments via eDockets ([www.edockets.state.mn.us](http://www.edockets.state.mn.us)).

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: June 20, 2022

*Signed: /s/ Breann L. Jurek*

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Susu	Jeffrey	susujeffrey@msn.com	Friends of Coldwater	1063 Antoinette Ave  Minneapolis, MN 55405	Electronic Service	No	OFF_SL_21-823_CN-21- 823
Ray	Kirsch	Raymond.Kirsch@state.mn .us	Department of Commerce	85 7th Place E Ste 500  St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-823_CN-21- 823
Anthony	Kit	a.kit@kghl.net		2828 N Harwood St Suite 1240  Dallas, TX 75202	Electronic Service	No	OFF_SL_21-823_CN-21- 823

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Rachel	Kitze Collins	rakitzecollins@locklaw.com	Lockridge Grindeal Nauen PLLP	100 Washington Ave S Suite 2200 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-823_CN-21-823
Chad	Konickson	chad.konickson@usace.army.mil	U.S.Army Corps of Engineers	180 5th St # 700  Saint Paul, MN 55101	Electronic Service	No	OFF_SL_21-823_CN-21-823
Stacy	Kotch Egstad	Stacy.Kotch@state.mn.us	MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd.  St. Paul, MN 55155	Electronic Service	No	OFF_SL_21-823_CN-21-823
Karen	Kromar	karen.kromar@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd  Saint Paul, MN 55155	Electronic Service	No	OFF_SL_21-823_CN-21-823
Winona	LaDuke	winonaladuke1@gmail.com	Honor the Earth	607 Main Avenue  Callaway, MN 56521	Electronic Service	No	OFF_SL_21-823_CN-21-823
Michelle	Lommel	mlommel@GREnergy.com	Great River Energy	12300 Elm Creek Blvd  Maple Grove, MN 55369	Electronic Service	No	OFF_SL_21-823_CN-21-823
Otto Edwin	Lueck	N/A		18719 US Hwy 2  Warba, MN 55793	Paper Service	No	OFF_SL_21-823_CN-21-823
Patrick	Mahlberg	pmahlberg@fredlaw.com	Fredrikson & Byron, P.A.	200 S 6th St Ste 4000  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-823_CN-21-823
Philip	Mahowald	pmahowald@thejacobsonlawgroup.com	Jacobson Law Group	180 East Fifth Street Suite 940  St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-823_CN-21-823

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Dawn S	Marsh	dawn_marsh@fws.gov	U.S. Fish & Wildlife Service	Minnesota-Wisconsin Field Offices 4101 American Blvd E Bloomington, MN 55425	Electronic Service	No	OFF_SL_21-823_CN-21-823
Joseph	Martoglio	Joseph.R.Martoglio@jpmchase.com		N/A	Electronic Service	No	OFF_SL_21-823_CN-21-823
Willis	Mattison	mattison@arvig.net	Self	42516 State Hwy 34  Osage, MN 56570	Electronic Service	No	OFF_SL_21-823_CN-21-823
Hayk	Minasian	hminasian@trlm.com		N/A	Electronic Service	No	OFF_SL_21-823_CN-21-823
John	Munter	mumooatthefarm@yahoo.com		14860 Bruce Crk Rd  Warba, MN 55793	Electronic Service	No	OFF_SL_21-823_CN-21-823
Michael	Murphy	mmurphy@thejacobsongroup.com		180 East Fifth Street Suite 940 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-823_CN-21-823
Charles	Nauen	cnnauen@locklaw.com	Lockridge Grindal Nauen	Suite 2200 100 Washington Avenue South Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-823_CN-21-823
Ann	O'Reilly	ann.oreilly@state.mn.us	Office of Administrative Hearings	PO Box 64620  St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-823_CN-21-823
Marsha	Parlow	mparlow@greenergy.com	Great River Energy	12300 Elm Creek Boulevard  Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_21-823_CN-21-823
Andrew	Pearson	stopthewar24@gmail.com		2629 18th Ave S Apt 2  Minneapolis, MN 55407	Electronic Service	No	OFF_SL_21-823_CN-21-823

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Alice	Peterson	N/A		24153 300th St NW  Argyle, MN 56713	Paper Service	No	OFF_SL_21-823_CN-21-823
Abbie	Plouff	abbie.plouff@gmail.com		308 E Prince St Apt 522 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-823_CN-21-823
Joseph	Plumer	joep@whiteearth.com	Red Lake Band of Chippewa Indians	P.O. Box 567  Red Lake, Minnesota 56671	Electronic Service	No	OFF_SL_21-823_CN-21-823
Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND	81 E Little Canada Road  St. Paul, Minnesota 55117	Electronic Service	No	OFF_SL_21-823_CN-21-823
James W.	Reents	jwreents@gmail.com		4561 Alder Ln NW  Hackensack, MN 56452	Electronic Service	No	OFF_SL_21-823_CN-21-823
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-823_CN-21-823
Steve	Roe	roetreat@crosslake.net		11663 Whitefish Ave  Crosslake, MN 56442	Electronic Service	No	OFF_SL_21-823_CN-21-823
Cynthia	Roney	cynthia.roney@enbridge.com	Enbridge Energy, Limited Partnership	5400 Westheimer Court Suite 5B-20 Houston, TX 77056	Electronic Service	No	OFF_SL_21-823_CN-21-823
Stephan	Roos	stephan.roos@state.mn.us	MN Department of Agriculture	625 Robert St N  Saint Paul, MN 55155-2538	Electronic Service	No	OFF_SL_21-823_CN-21-823
Jean	Ross	jfross@umn.edu		3624 Bryant Ave S  Minneapolis, MN 55409	Electronic Service	No	OFF_SL_21-823_CN-21-823

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Akilah	Sanders Reed	akilah.project350@gmail.com		2514 Emerson Ave S Apt 7 Minneapolis, Minnesota 55405	Electronic Service	No	OFF_SL_21-823_CN-21-823
Stan	Sattinger	sattinss@aol.com		3933 Twelfth Ave S  Minneapolis, MN 55407	Electronic Service	No	OFF_SL_21-823_CN-21-823
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-823_CN-21-823
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190  Richfield, MN 55423	Electronic Service	No	OFF_SL_21-823_CN-21-823
Eileen	Shore	eileenshore@outlook.com	Friends of the Headwaters	3137 42nd Ave So  Minneapolis, MN 55406	Electronic Service	No	OFF_SL_21-823_CN-21-823
Mollie	Smith	msmith@fredlaw.com	Fredrikson Byron PA	Suite 4000 200 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_21-823_CN-21-823
Richard	Smith	grizrs615@gmail.com	Friends of the Headwaters	P.O. Box 583  Park Rapids, MN 56470	Electronic Service	No	OFF_SL_21-823_CN-21-823
Scott	Strand	SStrand@elpc.org	Environmental Law & Policy Center	60 S 6th Street Suite 2800 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-823_CN-21-823
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_21-823_CN-21-823

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Christine	Tezak	tezak@cvenergy.com		209 Constitution Avenue, NE  Washington, DC 20002	Electronic Service	No	OFF_SL_21-823_CN-21-823
Jeremy	Tonet	jeremy.b.tonet@jpmorgan.com		N/A	Electronic Service	No	OFF_SL_21-823_CN-21-823
Jayne	Trusty	execdir@swrdc.org	SWRDC	2401 Broadway Ave #1  Slayton, MN 56172	Electronic Service	No	OFF_SL_21-823_CN-21-823
Sara	Van Norman	sara@svn.legal	Van Norman Law, PLLC	Van Norman Law, PLLC 310 4th Ave. S., Ste. 5010 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-823_CN-21-823
Ken	Vraa	N/A		6623 Peony Lane N  Maple Grove, MN 55311	Paper Service	No	OFF_SL_21-823_CN-21-823
Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road Box 25 St. Paul, Minnesota 55155-4040	Electronic Service	No	OFF_SL_21-823_CN-21-823
Tom	Watson	twatson@iphouse.com	Whitefish Area Property Owners Association	39195 Swanburg Court  Pine River, MN 56474	Electronic Service	No	OFF_SL_21-823_CN-21-823
James	Watts	james.watts@enbridge.com	Enbridge Pipelines (North Dakota) LLC	26 E Superior St Ste 309  Duluth, MN 55802	Electronic Service	No	OFF_SL_21-823_CN-21-823
Kenneth	Westlake	westlake.kenneth@epa.gov	US Environmental Protection Agency	Environmental Planning & Evaluation Unit 77 W Jackson Blvd. Mailstop B-19J Chicago, IL 60604-3590	Electronic Service	No	OFF_SL_21-823_CN-21-823
Alan	Whipple	sa.property@state.mn.us	Minnesota Department Of Revenue	Property Tax Division 600 N. Robert Street St. Paul, MN 551463340	Electronic Service	No	OFF_SL_21-823_CN-21-823



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Jonathan	Wolfgram	Jonathan.Wolfgram@state.mn.us	Office of Pipeline Safety	445 Minnesota St Ste 147 Woodbury, MN 55125	Electronic Service	No	OFF_SL_21-823_CN-21-823
David	Zoll	djzoll@locklaw.com	Lockridge Grindal Nauen PLLP	100 Washington Ave S Ste 2200 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-823_CN-21-823