



ENVIRONMENTAL LAW & POLICY CENTER

June 20, 2022

Public Advisor
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

Via eFiling

RE: Reply Comment of Friends of the Headwaters (FOH)

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

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

Dear Commission:

Thank you for the opportunity to submit reply comments on this matter.

Friends of the Headwaters is disappointed that Enbridge did not submit a complete proposal on May 19, 2022 for how it intends to comply with this Commission's requirement that it establish and fund a trust to cover decommissioning costs for the new line 3 (or Line 93, as Enbridge now refers to it). Instead, Enbridge recommended that, once this comment period expires, Enbridge be authorized to set up whatever trust fund arrangement it deems appropriate, subject only to review by the Commission's executive secretary to determine if it is consistent with the Commission's previous orders. FOH hopes that Enbridge will be more forthcoming in its reply comments, but it cannot support Enbridge's "just trust us" suggestion.

FOH appreciates Enbridge's estimate that decommissioning costs will be approximately \$1.2 billion, and its description of the Canadian Energy Regulator's estimate procedures. Again, however, as with Enbridge's October 16, 2018 cost estimate, there is very little detail about how the numbers were arrived at. Pipeline removal, for example, is listed as \$829 million, but Enbridge does not explain how that was arrived at, other than saying "a contractor" came up with that number in response to a request for proposals. It does not appear that any of the estimates are for what it would cost the State to do this work, even though the point of the decommissioning trust is to assure that funds are available if Enbridge defaults. We therefore request that the Commission obligate Enbridge to "show its work" so that interested parties and members of the public can assess whether Enbridge's estimates are reasonable.

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FOH is concerned that the contribution schedule Enbridge outlined will not provide adequate funding soon enough. Certainly the Commission should require a significant “down payment” on the front end. As we understand Enbridge’s comment, Enbridge plans to “prorate” the estimate amount, whether it be \$1.2 billion or some other figure, over 30 years so that the trust will not be “fully funded” until year 30 or right around 2050. That is, of course, many years after most experts conclude we will have to have moved completely off fossil fuels to avoid catastrophic climate consequences. FOH is not necessarily opposed to a schedule that would allow Enbridge to make contributions over several years, but the “full funding” should be based earliest reasonable date that “line 93” might cease being profitable enough for Enbridge to continue to operate at full capacity. In addition, if Enbridge significantly curtails, or announces that it will significantly curtail use of line 93 at any time, whether it be five, ten, twenty, or thirty years from now, Enbridge should be required to fully fund the decommissioning trust immediately.

Enbridge should also be required to disclose and justify any assumptions built into a proposed contribution schedule—discount rates, inflation estimates, predicted investment returns, interest rates, or any other similar factors. As this Commission well knows, any party can manipulate a future obligation by assuming a high discount rate over a longer term, and that must be avoided in this case. Especially now, with inflation and a bear market, it is also important that these assumptions, as well as the overall estimated cost, be subject to annual review and adjustment, not just the five-year review Enbridge proposes.

FOH generally supports the Department of Commerce’s recommendations.

FOH reluctantly agrees that the Commission needs to establish a new schedule containing all of the key milestones to get this task accomplished. Further delay only benefits Enbridge, and denies the Minnesota public the assurance they deserve that they will not be left holding the bag when new line 3 stops being profitable enough for the company. This should have been completed long ago. Yet, until all parties and the public have an actual proposal to review and comment on, no one can be confident that we will end up with a decommissioning trust fund that adequately protects the public. The list of issues in the Department of Commerce’s initial comment is useful, but there is no reason for accomplishing these tasks in sequence instead of all at once. We agree with the Department of Commerce’s recommendation that Enbridge make a detailed concrete proposal by a date certain to which DOC and the other parties, including the tribes, affected landowners and local governments, can respond. Enbridge of course has all the necessary information in its possession today. It knows (or can quickly find out) how its decommissioning costs were estimated. It can specify how much money Enbridge thinks it would need to contribute each year, and disclose any and all assumptions going into such a proposal. There is no reason to allow Enbridge to put this off for months.

The selection of a genuinely independent trustee, and the adoption of the specific terms and conditions of the trust agreement, can begin now as well, although likely cannot be finalized until we have the cost estimates and the contribution structure. The chart Enbridge included in its May 19 comment lists some of the issues. As far as the appropriate trust beneficiary is concerned, FOH’s position is that it should be left up to the State’s unilateral discretion to decide

which part of state government should be designated, but it would be appropriate for this Commission to set a deadline for getting that decision made.

FOH certainly opposes designating Enbridge as the beneficiary of the trust. Enbridge apparently contemplates that, at the time of decommissioning, Enbridge will then collect funds from the trustee to do the decommissioning work. Generally, however, financial assurance mechanisms like this are designed to create an incentive for the company to do the required work, even if it is strapped for funds and besieged by creditors, because it can then get the trust fund dollars returned. Completing decommissioning, remediation, and monitoring then becomes a source of revenue, rather than a legacy cost. If the company cannot or will not do the work, then the State can access the fund to get those tasks accomplished. It is not clear to FOH how a trust with Enbridge designated as the beneficiary is protected from being swept into a possible bankruptcy estate, or is beyond the reach of creditors.

FOH looks forward to a more complete proposal from Enbridge. We hope it will consider and address the concerns FOH raised in its initial comment, and in this document.

Respectfully submitted,

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DECLARATION OF SERVICE

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

STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

I, Scott Strand, hereby state that on June 20, 2022, I filed, by electronic eDockets, the attached **Reply Comment of Friends of the Headwaters**, and eServed or sent by U.S. Mail, as noted, to all parties on the attached service list.

See attached service list.

I declare under penalty of perjury that everything I have stated in this document is true and correct.

/s/ Scott Strand
Scott Strand

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