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Via E-mail: mpscedockets@michigan.gov

Docket ID: U-20763

Michigan Public Service Commission
7109 W. Saginaw Highway
Lansing, MI 48917

**RE: USW comments to the Michigan Public Service Commission
supporting Enbridge's Act 16 Application (U-20763)**

To Whom It May Concern:

We write to you on behalf of the members of the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union ("United Steelworkers" or "USW"). The USW is North America's largest industrial union, representing working people in various sectors, including approximately two thirds of domestic oil refining capacity. We are the District Directors for USW District 1 (Ohio) and USW District 2 (Michigan and Wisconsin).

Our union strongly supports Enbridge's application for Act 16 approval of its Straits Line 5 Replacement Segment Project to replace the existing dual pipelines and prevent deep, lasting economic damage in the region.

The safe operation of Line 5 is critical to fueling the economy of Northern Ohio and Southern Michigan. The existing pipeline supplies 55 percent of Michigan's statewide propane needs, including 85 percent of the propane that heats 24,000 Upper Peninsula and Northern Michigan homes, which is essential during the cold weather.¹ Also, Marathon's Detroit refinery receives 33,000 bpd of light crude oil, or 28 percent of its refining needs, through the line.

¹ http://www.michiganoilandgas.org/enbridge_line_5

Of critical importance to our union, Line 5 supplies crude oil to PBF Energy's Toledo Refinery, where the USW represents nearly 400 operation and maintenance employees, and the BP/Husky Toledo refinery, where USW represents nearly 300 workers. The light crude oil that Line 5 transports to PBF Toledo is primarily refined into jet fuel and makes up the bulk of jet fuel supply for the Detroit Metro Airport.

There are currently no feasible and prudent alternatives of supply that would sustain operation of the PBF Toledo refinery. The refinery's location does not have the infrastructure available to receive the needed supply by rail or truck. The refinery processes approximately 189,000 barrels per day, or the equivalent of around 900-1000 tanker truck loads. The nearest rail access to the refinery is located offsite and all product moved by rail has to be transferred by truck between the rail access and the refinery. The street system does not have the capacity to handle this type of increase. Additionally, it would not be economically practical to operate the refinery with the added transport cost, threatening the viability of the site.

Without the ability to receive crude oil via the Line 5 pipeline, PBF Toledo will be unable to operate. The refinery's customers, including those at the Detroit Metro Airport, will have to seek other sources that will likely transport oil across further distances. And the 400 highly-paid, union workers at the refinery will be out of work.

We agree that the current pipeline poses a risk to the environment and to the economy. Multiple anchor strikes and questions about its integrity underscore the need to swiftly construct a replacement pipeline that will improve safety. Enbridge has recognized the call for swift action and has reduced the timeline for the replacement project to five to six years, down from the original projection of close to ten years.²

It has been widely documented that pipelines are the safest and most efficient means of transporting large quantities of energy products.³ A closure of Line 5, without an operational replacement, will force more oil and gas products onto Michigan roads and railways, increasing the risk of surface incidents like the 2013 Quebec rail disaster that killed forty-seven people.⁴

We urge the Commission to resist the politicization of this application and to look practically at the immense economic and environmental risks of failing to approve Enbridge's application for Act 16 approval. Without the approval and construction of the replacement line, the risk of a premature shutdown of Line 5 rises

²https://www.enbridge.com/~/media/Enb/Documents/Projects/line5/ENB_Line5_AltEvaluation_Report_June15.pdf?la=en

³ <https://www.phmsa.dot.gov/faqs/general-pipeline-faqs>

⁴ <https://www.bloomberg.com/news/articles/2013-07-07/quebec-disaster-spurs-rail-versus-pipelines-debate-on-oil>

substantially, creating the potential of massive adverse effects on the people of Michigan, Ohio, and other states in the region. Family sustaining jobs, along with access to affordable heating fuel, rely on safe operation of the line.

Enbridge's Straits Line 5 Replacement Segment Project will achieve the goal of most relevant stakeholders – removing the current pipeline from the waters of the Straits of Mackinac, while continuing to deliver the energy and jobs that fuel the region. The design of the tunnel is a much safer alternative to the current line, and the route follows the current route of the pipeline. The proposed tunnel is also an opportunity to grow new infrastructure utility capabilities like broadband expansion that could be contained within the concrete tunnel.

It is for these reasons that the USW supports the approval of the project and urges the Michigan Public Service Commission to grant approval of Enbridge's Act 16 application. Please contact us if you have any questions regarding our support for this project.

Sincerely,



Donald E. Blatt
District 1 Director



Michael H. Bolton
District 2 Director