

**ICC Staff Data Request**

**ENG 1.69 Does Enbridge agree that the proposed pipeline route would interfere with the proposed highway project discussed in Matthew Sorensen's direct testimony? If not, explain what Enbridge believes to be wrong with Mr. Sorensen's description and location of both projects. Provide any maps that are relevant to the description.**

**Response prepared by:**

**Name: Dale Burgess**  
**Title: Director Southern Access**  
**Address: 10201 Jasper Avenue Edmonton, AB T5J 3N7**

Enbridge does not believe the pipeline route will interfere with the proposed East Side Access Highway (ESAH) under consideration east of Bloomington, Illinois. This highway proposal has been in the conceptual and planning stages since 2002, and a final proposed route within the extensive study corridor has not been selected. As Enbridge understands, the required federal funding needed to finance construction of the highway will require appropriate environmental assessments and approvals to be completed. This review will require a thorough assessment for each of the four potential highway alternative routes, and each alternative is still under consideration within the study corridor. Enbridge has been told the ESAH route alternative analysis is expected to take several years to complete, and so actual highway construction, in all likelihood, would not commence for 8-10 years or longer.

Therefore, it is Enbridge's view that securing funding, final route alternative analysis, permitting requirements and timing are too uncertain at this point in time to suggest that that an unknown highway route will interfere with an established, proposed pipeline route which was selected on the basis of an extensive route alternatives analysis. Also see Enbridge Exhibit 2A (Aller testimony), p. 2-4, lines 38-77.

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**ENG 1.70** If the highway project discussed in Mr. Sorensen's direct testimony does conflict with the proposed pipeline project, is Enbridge willing to reroute the pipeline as requested in Mr. Sorensen's testimony? If yes, explain what effect that will have to the route and how it will impact landowners. If not, explain why Enbridge is unwilling to reroute the pipeline.

Response prepared by:

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Enbridge does not believe that any conflict exists since the final route of the ESAH will not be known for a number of years.

Should the ESAH eventually be constructed along the Enbridge Extension pipeline route in some areas, there are well-established engineering and construction techniques that can be implemented so that the highway and pipeline can be mutually compatible, similar to measures the highway will need to take to safely accommodate the existence of other utilities. Many examples of pipelines operating below or near major highways can be found elsewhere in Illinois and throughout the nation.

Meanwhile, while the ESAH project moves ahead over the coming years, Enbridge is committed to sharing information and working with appropriate agencies to ensure that designs are coordinated, and any road construction adjacent to the pipeline is conducted in a manner that meets or exceeds relevant safety and engineering standards. Also see Enbridge Exhibit 2A (Aller testimony), p. 4, lines 79-87.

**Illinois Commerce Commission  
Response to Data Request dated January 9, 2008  
ENG 1.71 – ENG 1.74  
Enbridge Pipelines (Illinois) L.L.C.  
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**ABBREVIATIONS FACT SHEET**

bbbl	Barrels
bbbl/d	Barrels per day
kb/d	Thousand barrels per day
PADD II	Petroleum Administration for Defense District II
Shipper	A customer, who transports volumes on the pipeline, including oil producers, refiners and/or marketers.