

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Enbridge Pipelines (Illinois), L.L.C.,)
) 07-0446
Application Pursuant to Section 8-503, 8-509 and)
15-401 of the Public Utilities Act/The Common)
Carrier by Pipelines Law to Construct and Operate)
a Petroleum Pipeline and When Necessary to Take)
Private Property As Provided by the Law of)
Eminent Domain.)

PLIURA INTERVENORS' DATA REQUESTS TO APPLICANT
SUBMITTED AUGUST 11, 2014

To: Applicant, Enbridge Pipelines (Illinois), L.L.C.:

1. Please state the approximate date upon which Applicant decided to change the proposed SAX pipeline diameter from 36 inches to 24 inches.
2. Please state the approximate date upon which Applicant first notified the Illinois Commerce Commission in any fashion as to the decision to change the proposed SAX pipeline diameter from 36 inches to 24 inches, and the method of that notification. Please produce any documents related to that notification if such documents are not already a part of the record in ICC Docket 07-0446.
3. If the date that Applicant decided to change the proposed SAX pipeline diameter from 36 inches to 24 inches was prior to July 22, 2013, why did Applicant reference a 36 inch diameter pipeline in its application in ICC Docket 13-0446 and make no mention of the planned 24-inch diameter pipeline?
4. If the date that Applicant decided to change the proposed SAX pipeline diameter from 36 inches to 24 inches was prior to July 22, 2013, why did Applicant reference a 400,000 BPD capacity for the SAX in its application in ICC Docket 13-0446 and make no mention of the planned 24-inch diameter pipeline or its reduced capacity?

5. Previous evidence and testimony submitted by Applicant in 07-0446 concerning public benefit of the proposed SAX pipeline presumed a 36 inch internal diameter pipeline and a capacity of 400,000 BPD. Please produce all documents in the possession of Applicant disclosing revised calculations of public benefit due to the reduced pipeline diameter and reduced pipeline capacity.
6. Please state the approximate date upon which Applicant decided to change the primary product to be shipped via the SAX from Canadian Heavy Crude as reflected in the application to Bakkan Light Oil as reflected in the motion to reopen.
7. Please state the approximate date upon which Applicant first notified the Illinois Commerce Commission in any fashion as to the decision to change the primary product to be shipped via the SAX from Canadian Heavy Crude as reflected in the application to Bakkan Light Oil as reflected in the motion to reopen, and the method of that notification. Please produce any documents related to that notification if such documents are not already a part of the record in ICC Docket 07-0446.
8. Previous evidence and testimony submitted by Applicant in 07-0446 concerning public benefit of the proposed SAX pipeline presumed the primary product to be shipped via the SAX to be Canadian Heavy Crude. Please produce all documents in the possession of Applicant disclosing revised calculations of public benefit due to the change in primary product to be shipped from Canadian Heavy Crude to Bakkan Light Oil.
9. What percentage of the shipper commitments now in place for the SAX is from companies other than Marathon Petroleum or its subsidiaries and affiliates?
10. What percentage of the shipper commitments now in place for the SAX is for the transportation of Canadian Heavy Crude?

11. Please provide documents which detail the ownership or investment interest in the SAX held by Marathon Petroleum or its subsidiaries and affiliates, including documents which detail the date and such interest was acquired, the percentage of ownership interest acquired, and whether any entity, including Marathon Petroleum or its subsidiaries and affiliates has acquired any preferential terms or status as a shipper on the SAX.
12. Please provide documentation detailing all current shipper commitments for the SAX. If it is the position of the Applicant that disclosure of such information is prohibited by state or federal law or regulation, please provide a citation to all such statutes or regulations upon which Applicant asserts a limitation on disclosure.
13. Is Marathon Petroleum or its subsidiaries and affiliates an “Anchor Shipper”, as that term is commonly used in the liquid petroleum and natural gas pipeline vernacular, for the SAX?
14. Is any other entity an “Anchor Shipper” for the SAX?
15. Pliura Intervenors incorporate by reference the data requests of Turner Intervenors and McLean County.

Respectfully submitted this 11th day of August, 2014

s/THOMAS J. PLIURA, M.D., J.D.
Thomas J. Pliura,
Attorney for “Pliura Intervenors”

Thomas J. Pliura
210 E. Center Street
P.O. Box 130
LeRoy, IL 61752
(309) 962-2299 (Tel)
(309) 962-4646 (Facsimile)
e-mail: tom.pliura@zchart.com

PROOF OF SERVICE

The undersigned certifies that on this 11th day of August, he served a copy of the foregoing document together with copies of each Petition to Intervene upon the individuals on the attached service list, by electronic mail.

Amy Back & Joel Kanvik
Enbridge Energy Company, Inc.
1409 Hammond Ave.
Superior, WI 54880
mailto:joel.kanvik@enbridge.com

Bruce Stevenson, Corporate Secretary
Enbridge Pipelines (Illinois) L.L.C.
1100 Louisiana St., Ste. 3300
Houston, TX 77002-5217
mailto:bruce.stevenson@enbridge.com

Gerald Ambrose, Dale E. Thomas
& G. Darryl Reed
Attys. for Petitioner
Sidley Austin LLP
One S. Dearborn
Chicago, IL 60603
mailto:gambrose@sidley.com
mailto:dthomas@sidley.com
mailto:gdreed@sidley.com

Document Processor
Enbridge Pipelines (Illinois) L.L.C.
C T Corporation System
208 S. LaSalle St.
Chicago, IL 60604
mailto:Fax: (312) 345-4343

Mark Maple, Case Manager
Illinois Commerce Commission
527 E. Capitol Ave.
Springfield, IL 62701
mailto:mmapple@icc.illinois.gov

John Feeley
Office of General Counsel
Illinois Commerce Commission,
160 N. LaSalle, Ste. C-800
Chicago, IL 60601
mailto:jfeeley@icc.illinois.gov

James V. Olivero
Office of General Counsel
Illinois Commerce Commission
527 E. Capitol Ave.
Springfield, IL 62701
mailto:jolivero@icc.illinois.gov

Larry Jones
Administrative Law Judge
Illinois Commerce Commission
527 E. Capitol Ave.
Springfield, IL 62701
mailto:ljones@icc.illinois.gov

Mercer Turner,
Law Office of Mercer Turner, P.C.
202 N. Prospect, Ste. 202
Bloomington, IL 61701
E-Mail: mercerturner1@msn.com

Diana Hospelhorn
McLean County Administration
115 E Washington St Rm 401
Bloomington, Il 61701
diana.hospelhorn@mcleancountyil.gov

Pablo Eves
First Assistant States Attorney
Government Center
115 E Washington St Rm 401
Bloomington, Il 61701
pablo.eves@mcleancountyil.gov

s/THOMAS J. PLIURA, M.D., J.D.
Thomas J. Pliura,
Attorney for “Pliura Intervenors”

Thomas J. Pliura
210 E. Center Street
P.O. Box 130
LeRoy, IL 61752
(309) 962-2299 (Tel)
(309) 962-4646 (Facsimile)
e-mail: tom.pliura@zchart.com