MEMORANDUM FOR RECORD

SUBJECT: Enbridge Line 5 Tunnel – Purpose and Need

1. Reference:
   A. Public notice, dated May 15, 2020
   B. Notice of Intent to Prepare a Draft EIS, dated August 15, 2022
   C. Scoping Report, dated November 30, 2022
   D. Cooperating Agency comments summary, dated December 5, 2022
   E. Meeting Record, dated April 20, 2022
   F. Meeting Record, dated May 3, 2022
   G. Memorandum for the Record, dated August 9, 2022
   H. Data Request 16, dated December 20, 2022
   I. Enbridge Response to Data Request 16, dated January 19, 2023
   J. U.S. Army Corps of Engineers regulations at 33 C.F.R. 325, Appendix B

2. Purpose. This memorandum identifies the purpose and need for the U.S. Army Corps of Engineers’ (Corps) review under the National Environmental Policy Act (NEPA) of the proposal by Enbridge Energy, Limited Partnership (Enbridge) to construct a pipeline tunnel under the Straits of Mackinac (Straits) in Michigan. The Corps is preparing an environmental impact statement (EIS) to comply with the requirements of the NEPA.

3. Background. The Corps initially identified a project purpose and need in its initial public notice of May 15, 2020. Later, following the Corps’ decision to prepare an EIS, the Corps provided a draft Notice of Intent (NOI), which contained a draft purpose and need statement, to cooperating agencies on April 5, 2022. The Corps met with cooperating agencies to consider purpose and need on April 20 and May 3, 2022. We addressed cooperating agency comments in a memorandum of August 9, 2022, and further refined the purpose and need statement in the Notice of Intent (NOI) for the EIS, dated August 15, 2022. We requested additional information from Enbridge on the project purpose and need on December 20, 2022, and Enbridge responded on January 19, 2023. In this memorandum, we consider scoping comments and additional input received from cooperating agencies, consulting Tribes, the public, and Enbridge to refine and develop a purpose and need statement for use in the EIS.

4. The purpose and need stated in the NOI is as follows: “Purpose and Need: The purpose of the project is to provide transportation of light crude oil, light synthetic crude oil, light sweet crude oil, and natural gas liquids between Enbridge’s existing North Straits Facility and Mackinaw Station, and to approximately maintain the existing capacity of the Line 5 pipeline while minimizing environmental risks.”
5. Enbridge’s stated purpose. The purpose and need statement provided by the applicant is as follows:

The State and Enbridge agreed through a series of agreements that the Project is needed to enhance protection to the Great Lakes resulting from the transport of petroleum products on Line 5 across the Straits. Specifically, the Project is needed to transport the annual average of approximately 540,000 barrels per day (“bpd”) of petroleum products that are currently carried across the Straits on the Line 5 Dual Pipelines on the new Line 5 Replacement Segment connecting Enbridge’s North Straits Facility and Mackinaw Station that is to be constructed within an underground tunnel. The need to transport the annual average of approximately 540,000 bpd of petroleum products on Line 5 across the Straits is explained in response to Data Requests 16.B-C. The underground tunnel will provide secondary containment for any potential release of petroleum products from the Line 5 Replacement Segment into the tunnel, thereby preventing a release into the Straits and minimizing risk to the environment. In its 2018 agreements with the State, Enbridge and the State agreed that the placement of the Line 5 Replacement Segment into a tunnel beneath the Straits “is expected to eliminate the risk of a potential release from Line 5 at the Straits,” thereby “further protect[ing] ecological and natural resources held in public trust by the State of Michigan.” The State also enacted legislation in 2018, Public Act 359, because it deemed the tunnel “necessary to the public health, welfare, convenience and prosperity” of Michigan.” As stated in Public Act 359, the Project is needed to “allow[ ] for the use of the utility tunnel by multiple utilities, provide[ ] an option to better connect the Upper and Lower Peninsulas of this state, and provide[ ] a route to allow utilities to be laid without future disturbance to the bottomlands of the Straits of Mackinac.” Without the Project, the existing Line 5 Dual Pipelines will continue to operate in their current configuration partially exposed on the lakebed of the Straits, transporting 540,000 bpd of petroleum products without any secondary containment.

In addition, Enbridge clarified that their purpose was to fulfill their contractual obligations to the State of Michigan (i.e., the Tunnel Agreements).

Response: The Corps of Engineers was not a party to the State of Michigan’s negotiations or agreements with Enbridge. These agreements and the State’s legislation do not obligate the Corps to take any particular course of action. Furthermore, basing the project purpose on fulfillment of Enbridge’s agreements with the State would unduly restrict the project purpose so as to eliminate all alternatives that are not stated in the agreement. However, we will independently consider the available information regarding the purpose and intent of these agreements. Presently, we have no solid evidence of interest by other utilities in placing lines within the proposed tunnel, and the need for a utility tunnel for lines other than
Enbridge’s Line 5 pipeline is not supported at this time.

6. Comment and response. We address cooperating agency, Tribal, and public comments below. Similar comments are summarized together.

Comment: The purpose and need statement included in the Notice of Intent is unreasonably narrow and focuses only on construction of the proposed Line 5 Tunnel, a preordained outcome. Limiting the purpose of the project to transportation of fuels between the existing North Straits Facility and the Mackinaw Station defines any reasonable alternatives out of existence. Consider more generally referring to connecting the Upper and Lower Peninsulas. Assess whether geotechnical and other considerations could allow for other rights-of-way and project termini with less environmental impact or risks than Enbridge’s proposed connection of the North Straits Facility to the Mackinaw Station.

Response: 33 C.F.R. Part 325, Appendix B, paragraph 9(b)(4) states that, “If the scope of analysis for the NEPA document (see paragraph 7b) covers only the proposed specific activity requiring a Department of the Army permit, then the underlying purpose and need for that specific activity should be stated.” Based on the Corps’ authority and scope of analysis, the purpose and need statement focuses on the waterway crossing itself, including the activities that would occur between two logical termini on either end of the waterway crossing. Because Line 5 is an existing pipeline, not a new pipeline, we view the existing infrastructure (i.e., the North Straits Facility and the Mackinaw Station) as these logical termini for our review. No other stations are nearby. We disagree that the draft purpose and need statement is overly narrow or would allow for only one outcome. The statement allows for identification and evaluation of a reasonable range of alternatives to the project within Corps’ authority.

Comment: Line 5 cannot operate without the Straits crossing; therefore, the purpose and need for the project should mirror the purpose and need for Line 5 overall. The purpose of the project is to meet the energy requirements of the region while minimizing the adverse effect on the environment.

Response: As noted in the response above, the Corps’ authority and scope of analysis are limited to the activities associated with crossing the Straits and its adjacent wetlands. The purpose and need statement is appropriately limited to this crossing. We acknowledge the use of Line 5’s transported products in the region, and we consider the purpose and need in light of Line 5’s overall use. However, our consideration of project purpose and need is limited to the Straits crossing, based on our regulations and authorities.

Comment: No studies or reports demonstrate that the products transported by the Line 5 pipeline, especially at its current capacity, are needed in the region. Instead,
expert testimony in other Line 5 proceedings, the historical record, and independent reports demonstrate that there is no such need. Shutting down Line 5 would impact gas prices minimally or not at all, and energy demands for crude oil and natural gas can be satisfied from other sources and methods.

Response: Whether there are other means to transport or acquire the products currently transported by Line 5 is not directly pertinent to the project need for this NEPA analysis. We will consider whether alternative means of transporting pipeline products may satisfy the project purpose in the context of the alternatives analysis.

Line 5 is an existing pipeline that currently transports approximately 540,000 barrels per day of light crude oil and natural gas liquids (NGLs) to markets in the U.S. and Canada. Based on the current transport and use of these products, there is a market demand and therefore a public need for the volume of light crude oil and NGLs currently transported. The project is not speculative, as it is based on current needs for the pipeline products, as demonstrated by current use of the products. The demand for petroleum products continues into the foreseeable future, based on projections by the U.S. Energy Information Administration (EIA)\(^1\). Line 5 is currently the only source of NGLs to fractionators in Rapid River, Michigan and Sarnia, Ontario. At those locations, the fractionators supplied by Line 5 are each the largest sources of propane in their respective regions, and the propane is primarily used for heating homes and businesses. Butane carried by Line 5 is used for various industrial purposes. These current uses demonstrate the present need for NGL transport. Based on the reliance of the existing fractionators on NGLs carried by Line 5 to provide a substantial portion of the propane supplies in their respective regions, the need for NGLs in the reasonably foreseeable future is supported.

Comment: Consider the need for Line 5 to transport propane, with consideration of the Michigan Propane Security Plan.

Response: The Michigan Propane Security Plan, revision dated March 11, 2021, was prepared to “ensure a secure propane supply for Michigan families and businesses when Line 5 shuts down.” The report references Governor Whitmer’s revocation of the State of Michigan easement for the existing Line 5 dual pipelines to cross the Straits of Mackinac, which was to take effect in May 2021. Enbridge has challenged the easement revocation, and the issue remains in litigation. Meanwhile, Enbridge continues to operate the dual pipelines. In addition, the report does not address Enbridge’s proposed tunnel and replacement segment for the dual pipelines, nor the extent to which it would supply propane needs.

The question of whether Michigan’s propane needs could be satisfied without Line 5 is not directly relevant to our consideration of the need for the proposed tunnel

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project. We will consider whether alternative means of transporting pipeline products may satisfy the project purpose in the context of the alternatives analysis.

Comment: The lifespan of the pipeline may be limited due to expected decreases in demand for fossil-fuel-based energy. Given the time needed for permitting and construction of a tunnel, there may be reduced demand for the pipeline products at the time the new pipeline could begin operation. Enbridge’s filing to the Federal Energy Regulatory Commission (FERC) states that the Lakehead Pipeline System (of which Line 5 is a part) has a truncation date of December 31, 2040, based on an economic review of the system. The short- and long-term economic viability; actions by state, local, and Tribal governments to shut down the existing pipeline; and national transition toward renewable energy sources should be considered in the project need.

Response: Based on projections from the EIA, demand for petroleum products remains steady through at least 2050, despite increases in renewable energy use. Projections in the EIA annual energy outlook end in 2050. Changes in demand past that point are increasingly speculative and beyond what we consider the reasonably foreseeable future. The truncation date identified in the depreciation report filed with FERC is used to establish depreciation rates that are used in setting the transportation rates charged to shippers. Enbridge has indicated that pipelines are not limited by the truncation date supplied to FERC and may continue to operate indefinitely, provided they meet safety standards. We do not interpret Enbridge’s statements in their FERC filing to indicate that Enbridge will cease operation of Line 5 in 2040.

According to 33 C.F.R. § 320.4(q), “When private enterprise makes application for a permit, it will generally be assumed that appropriate economic evaluations have been completed, the proposal is economically viable, and is needed in the market place. However, the district engineer in appropriate cases, may make an independent review of the need for the project from the perspective of the overall public interest.” We considered in our review whether the need for transport of the pipeline products through the proposed replacement pipeline is supported. In cases where a proposed project may appear speculative, we may inquire further regarding the need for the proposed project. In this case, the current needs for transport of the pipeline products are supported by their existing use, and the need for the pipeline products in the foreseeable future is supported, as discussed above. We will address needs for crude oil and natural gas liquids further in the EIS.

Comment: Provide a statement that explains the overall need for the project. Address (1) underlying needs for energy resources in the U.S.; (2) the need for transportation of petroleum and natural gas products in this region, which includes identifying the need of Line 5 due to conflicting reports of the actual need of the line to transport natural gas and crude oil to the Upper Peninsula of Michigan; and (3)
the need for safety improvements if a pipeline is to continue to be located under the Straits, including acknowledgement that the pipeline is an aging system and Enbridge is performing several section replacements, including under the St. Clair River, and a reroute in Wisconsin.

Response: In accordance with 33 C.F.R. Part 325, Appendix B, we focus on the purpose and need of the specific activity requiring Corps authorization (i.e., the Straits crossing). The activities the Corps is reviewing are the proposed construction and operation of the tunnel and pipeline crossing the Straits of Mackinac. Line 5 is an existing pipeline, and the products it carries are used in the marketplace. Based on the available information (e.g., the EIA energy forecast), continued demand is expected through the reasonably foreseeable future. The need for Line 5 overall is beyond the scope of our analysis. However, we expect to provide further information on the demand for and use of the pipeline products transported through the Straits crossing in the appropriate chapters of the EIS.

Enbridge identified a need for safer transport of petroleum products at the Straits crossing in their purpose and need statement. Specifically, Enbridge identified minimizing environmental risks through secondary containment for any potential release of petroleum products as a project goal. Another anticipated safety benefit is protection against vessel anchor strikes. Although Enbridge emphasizes pipeline safety improvement as an essential part of the project purpose, the Corps will not independently analyze the condition of the existing dual pipelines as part of its review. The federal agency with jurisdiction over matters of pipeline safety is the Pipeline and Hazardous Materials Safety Administration (PHMSA), and Enbridge is required to comply with applicable PHMSA regulations and safety standards. The identified need for safety improvements is based on the opportunity to provide defined features such as secondary containment and vessel anchor strike protection. These features represent pipeline safety improvements regardless of the condition of the existing pipeline.

Comment: Remove the statement on maintaining existing petroleum capacity from the purpose and need statement and instead consider current and future capacity when developing a reasonable range of alternatives.

Response: We retained the phrase in the project purpose to “approximately maintain the existing capacity” to emphasize that there is flexibility regarding pipeline capacity in considering alternatives. The proposed project would replace a segment of an existing pipeline. Consideration of the existing infrastructure and its capacity is appropriate in defining the project purpose.

Comment: Consider the Council on Environmental Quality’s (CEQ) Final Rule for Phase 1 of Revisions to the National Environmental Policy Act (NEPA) Regulations. The April 20, 2022, Federal Register states, “The revision clarifies that agencies
have discretion to consider a variety of factors when assessing an application for an authorization, removing the requirement that an agency base the purpose and need on the goals of an applicant and the agency’s statutory authority."

Response: We considered the applicant’s stated purpose but independently defined the purpose and need, consistent with the 1978 CEQ NEPA regulation. The Corps began its NEPA process prior to September 14, 2020, and pursuant to 40 C.F.R. § 1506.13 (2020), the Corps can use either the 2020 NEPA regulations or the 1978 NEPA regulations in this EIS. The Corps has opted to continue with the 1978 NEPA regulations. Therefore, the Phase 1 revisions to the 2020 NEPA regulation do not apply.

Comment: Under the current needs statement, the purpose is to prevent a spill in the Straits of Mackinac. If this is the true purpose, then the entire pipeline that crosses tributaries to the Straits should be included in the EIS, not just a 3.6-mile portion that is most publicized.

Response: We disagree that the project purpose is to prevent a spill in the Straits. Instead, it is to provide for the safe transport of pipeline products between Enbridge’s existing facilities, while approximately maintaining Line 5’s existing capacity and minimizing environmental risks. As discussed above, the Corps’ scope of analysis and consideration of purpose and need is limited to the Straits crossing. This is a major federal action of limited scope and does not require NEPA review over the entire pipeline.

Comment: The needs analysis should include consideration of the needs and welfare of the people, the relative extent of need, needs to reduce carbon emissions, needs to protect the Great Lakes, and the Tribes’ need to sustain natural resources for future generations.

Response: The Corps will consider the impact of the proposed project and reasonable alternatives on the needs and welfare of the people as part of its public interest review in accordance with 33 C.F.R. § 320.4(a)(1). The needs and welfare of the people is distinct from the need for the proposed project. Similarly, the Corps evaluates the relative extent of the public and private need for each project in accordance with 33 C.F.R. § 320.4(a)(2)(i). We will consider the project need, as refined for use in the EIS, in that analysis. In addition, the Corps will review compliance with applicable legal and policy requirements, as well as environmental justice implications and effects on treaty rights, in the EIS.

Comment: The purpose and need statement must consider the long-term costs of continued investment in infrastructure that promotes dependence on fossil fuels.

Response: We interpret this comment as referring to the impacts of construction of
fossil fuel infrastructure relative to individual, state, regional, or national priorities. Consideration of long-term investment in fossil fuel infrastructure is not directly relevant to the purpose and need of the proposed tunnel and pipeline crossing the Straits. We will consider this as part of the environmental consequences of the project and its alternatives in the EIS, to the extent it is within our scope of analysis.

Comment: The Corps should not rely solely on information from Enbridge to identify the project need. The Corps should review independent third-party studies on need.

Response: The Corps defines the project purpose and need in accordance with its regulations in 33 C.F.R. Part 325, Appendix B. As explained above, we focus on the purpose and need of the specific activity requiring Corps authorization (i.e., the Straits crossing), and not the entirety of Line 5. We are aware of studies that consider the need for Line 5 overall, which either predict the consequences of a shutdown of Line 5 or consider alternatives to Line 5 (see attached table). These questions are not directly relevant to the purpose and need for the activities within the Corps’ review, and we will address appropriate aspects of these questions in our review of project alternatives and impacts. We used the EIA study referenced above and in the attached table to provide information on use of petroleum products in the reasonably foreseeable future. We are not aware of specific studies that evaluate the need for the proposed project that would be useful within the framework of our regulations and authorities. Regardless of third-party studies, the Corps must independently define the project purpose and need in accordance with the applicable regulations. We considered the available information from Enbridge and other sources, and we independently defined the project purpose and need, as described in this document. Information on the existing infrastructure and uses provided a factual basis that weighed heavily in our consideration, and we determined that we had adequate information to define the project purpose and need.

Comment: The project purpose should include a timeframe indicating the number of years the project is expected to operate.

Response: Enbridge has not defined a timeframe for the operation of the proposed pipeline segment. They indicate that a pipeline can be operated indefinitely, subject to maintenance requirements as needed to comply with the federal safety standards set forth in 49 C.F.R. Part 195. Projections of the EIA indicate a continued demand for petroleum products through 2050, which provides a basis for our expectation that the segment would continue to operate at least until 2050, if authorized. We consider the period for which we have energy use projections from the EIA for the “reasonably foreseeable future.” Beyond that date, predictions of future petroleum product needs are increasingly speculative. Although the State of Michigan’s agreements with Enbridge provide for a 99-year lease to Enbridge for use of Line 5 within the tunnel, a lease could be renewed, or the pipeline may cease operation.
before the lease matures. There is no specific requirement or need for the project purpose to identify an expected operating period. For the purposes of impact analysis, we will consider operation of the proposed project and its reasonable alternatives for the reasonably foreseeable future (i.e., through 2050), with consideration of impacts that may extend beyond that period if operation continues.

7. Conclusion. After considering the Corps' regulations and authority, we determined that the purpose and need statement appropriately focuses on the Straits crossing rather than the entirety of Line 5. As an existing pipeline, the existing products, capacity, and infrastructure on the north and south shores of the Straits are primary considerations in our definition of the project purpose and need. Safety improvements appear to be the underlying need addressed in the State of Michigan's negotiations and agreements with Enbridge, and the Corps will evaluate the opportunity for safer transport of the pipeline products. We have revised the project purpose to specify the purpose of providing safe transportation of pipeline products, as stated in the paragraph below. While the proposed tunnel project includes secondary containment for potential releases of pipeline product, as well as vessel anchor protection, the project purpose should not specify the nature of safety improvements so as not to unnecessarily restrict consideration of alternatives. The purpose and need statement includes the phrase, “while minimizing environmental risks,” to incorporate the consideration of safety measures and improvements.

Based on our review of public and cooperating agency scoping comments, we affirm that the purpose of the project is to provide safe transportation of light crude oil, light synthetic crude oil, light sweet crude oil, and natural gas liquids between Enbridge's existing North Straits Facility and Mackinaw Station, and to approximately maintain the existing capacity of the Line 5 pipeline while minimizing environmental risks.

Charles M. Simon  
Chief, Regulatory Branch  
Operations Division
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<th>Study Name</th>
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<tr>
<td>Natural Gas Infrastructure Implications of Increased Demand from the Electric Power Sector, February 2015</td>
<td>This report analyzes the potential pipeline infrastructure needs under future natural gas demand scenarios. These scenarios are based on a simply illustrative national carbon policy applied to the electric power sector that drives increased electric sector natural gas use. The report found that diversifying sources of natural gas will reduce the need for additional pipeline infrastructure. Higher utilization will also decrease the need for new infrastructure.</td>
<td>U.S Department of Energy</td>
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<tr>
<td>Assessment of Alternative Methods of Supplying Propane to Michigan in the Absence of Line 5, July 23, 2018</td>
<td>This report discusses the viability of alternative propane transport to Michigan as well as propane consumer use as a whole. LEI reviewed publicly available data and conducted literature on Michigan energy trends to make its recommendations. It found that the Michigan residential sector uses the most propane. However, demand in the state has been decreasing, due to increased renewable energy sources and increased NGL production in surrounding states. As for transportation methods other than Line 5, the cheapest options would translate to $0.05 per gallon increase in consumer propane prices in the Upper Peninsula and negligible increase in the Lower Peninsula.</td>
<td>London Economics International LLC, Prepared for National Wildlife Federation</td>
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<td>Michigan Crude Oil Production: Alternatives to Enbridge Line 5 for transportation, August 23, 2018</td>
<td>This report discusses the alternative crude oil production methods, primarily focusing on costs of different production regions. The northern region accounts for 37 percent of Michigan oil production and the next best alternative would be $1.31 more than Line 5. The central region accounts for 28 percent and price increase would depend on location but would generally be lower than the northern region. The southern region accounts for 35% and does not use Line 5 to transport oil and would not see a price increase from the removal of Line 5.</td>
<td>London Economics International LLC, Prepared for National Wildlife Federation</td>
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<tr>
<td>Michigan Refining Sector: Alternatives to Enbridge Line 5 for Transportation, September 12, 2018</td>
<td>This is a report detailing the effects of a Line 5 closure on the three major refineries that serve Michigan. One refinery is in Detroit, Michigan and two are in Toledo, Ohio. The report found that the least expensive alternative would result in a $.45 increase per barrel in refining costs. This would translate to a .65 cent increase if costs were passed to consumers, however that is not possible because the three refineries do not have a monopoly on Michigan. As for production itself, they would have to make up 68,579 barrels per day. As a side note, if an expansion to Line 78 was possible it could potentially replace the number of barrels lost from a Line 5 closure.</td>
<td>London Economics International LLC, Prepared for National Wildlife Federation</td>
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<td>Michigan Statewide Energy Assessment, July 1, 2019</td>
<td>This is a review of Michigan energy available and risk mitigation. It states that Michigan’s current energy delivery systems are adequate. It recommends multiple options for risk mitigation, in the events of natural disasters or extreme weather events that might affect energy supply. It recommends options such as risk-based integrated planning and diversifying power supplies.</td>
<td>Michigan Public Service Commission</td>
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<td>Michigan and Plains – Propane Overview, September 2019</td>
<td>This presentation details how NGL gets from production to market with Line 5 and explores the implications of a pipeline outage. It provides a visual breakdown of NGL movement across the Plains area as well. It mentions that a rail outage could lead to a loss of supply and shortages that cause higher prices and socioeconomic impacts.</td>
<td>Plains Midstream Canada</td>
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<td>Upper Peninsula Energy Task Force Committee Recommendations Part I – Propane Supply, April 17, 2020</td>
<td>This report asses the Upper Peninsula’s energy supply and demand and formulates substitute supply scenarios with a focus on security, reliability, affordability, and environmental soundness. The Michigan propane market is explored in depth as well. There is a focus on both short- and long-term scale to assess shortage and price spike causes. The report also includes a full analysis of propane supply options, in which it recommends rail transport as the most cost-effective option.</td>
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<td>Closing Enbridge’s Line 5 Pipeline What are the Options and Alternatives</td>
<td>This report provides a background and alternatives in the event that Line 5 is shut down. It argues that if Line 5 closed the loss would be manageable and that Line 78 would be able to make up for lost production. It also puts forth rail and tankers as alternatives. It concludes that alternatives would raise the price of gasoline by 1.8 cents per liter.</td>
<td>Environmental Defence Canada</td>
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<td>Available, February 2021</td>
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<td>Statewide Energy Assessment (SEA) Status Updates, September 9, 2021</td>
<td>This assessment provides a status update on progress with energy delivery systems and makes sure that the design of said delivery systems is adequate. There is a particular focus on ensuring they are resilient against changing conditions and extreme weather events. It also makes recommendations on how to mitigate risk in practice and in legislation.</td>
<td>Michigan Public Service Commission</td>
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<td>Annual Energy Outlook, March 2023</td>
<td>This report is an overview of energy trends of the United States. Overall, demand for renewable energy is increasing and equipment energy is decreasing overall fuel use. Coal production is projected to decrease. Currently, international demand drives US production. If there is a good economic supply, natural gas production should continue to grow.</td>
<td>U.S. Energy Information Administration</td>
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<td>AEO2023 Issues in Focus: Inflation Reduction Act Cases in the AEO2023, March 2023</td>
<td>This report assesses the changes to energy systems under the Inflation Reduction Act, which includes new provisions for clean energy projects. It provides multiple case studies in order to understand the complexities and changes to infrastructure that come with this new act.</td>
<td>U.S. Energy Information Administration</td>
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