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Regulatory Enhancement Branch, Operations Division  
Alberta Energy Regulator  
Suite 1000, 250 – 5 Street SW  
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July 9, 2020

Dear Jenny Miller,

The Canadian Energy Pipeline Association (CEPA) appreciates the opportunity to comment on the Alberta Energy Regulator's (AER) Pipeline Rules Rewrite Project. CEPA represents Canada's transmission pipeline companies who operate approximately 121,000 kilometres of pipeline in Canada and 14,000 kilometres in the United States. CEPA members move approximately 1.2 billion barrels of liquid petroleum products and 5.4 trillion cubic feet of natural gas each year.

Overall, CEPA is fully supportive of the AER's intent to create efficiency and certainty through regulatory changes as long as changes are made without undue burden and provide increased efficiency and clarity. As such, CEPA and its members provided specific recommendations in a letter sent on April 16, 2020. The attached document contains additional feedback based on new information obtained over the past three months.

As always, CEPA looks forward to continued engagement on this matter. Please do not hesitate to contact the undersigned if you have any questions or require clarification regarding any of the comments made above.

Yours sincerely,

Kai Horsfield  
Manager, Regulatory and Policy



### Pipeline Rules Reform Project – CEPA Feedback

Pipeline Rules Section/ Topic	Issue	CEPA Feedback/Recommendation
Part 8 Release of Product	Providing incident cost information for failures	<p>CEPA believes that including incident costs does not add value to the effectiveness of incident reporting or consequence classification. Reporting costs associated with an incident will vary widely due to individual company processes and procedures. For example, companies have different methods of tracking costs. A company that hires a contractor to respond to an incident will have a different cost structure and resulting costs compared to a company that relies on internal response capabilities. Further to this point, a company may choose to pay for differing levels of contingency or back up resources. These could all be appropriate solutions for responding to an incident but result in very different costs for similar event types and outcomes.</p> <p>CEPA recommends that the Pipeline Rules do not include supplying incident cost data to the Regulator for incident reporting.</p>
Part 2 Materials and Design	Section i) TSP's	CEPA believes the advance notification system in DDS/OneStop prior to operation/application or public notice should not be too lengthy or burdening as this would defeat the purpose.
Part 10 Discontinuance, Abandonment, Removal or Resumption	Section f) Removals/abandonments	CEPA sees a need to update the D56 licensing notifications areas accordingly. The revised rules state that removal mimics discontinuation and abandonment where notification is not required prior to work, however currently abandonments require notification prior to work being done.