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October 20, 2014

Via Email
Original via Mail

National Energy Board
517 Tenth Avenue S.W.
Calgary, Alberta
T2R 0A8

Attention: Ms. Sheri Young, Secretary of the Board

MAIL ROOM
SALLE DE COURIER
2014 OCT 22 A 9:43
NEB/ONE

Dear Ms. Young:

Re: National Energy Board (NEB or the Board)
Proposed Amendments to Regulations for Pipeline Damage Prevention
FortisBC Energy Inc. (FEI) Comments

On September 18, 2014, the NEB released the above mentioned Proposed Amendments to Regulations for Pipeline Damage Prevention (the Proposed Amendments), and invited feedback from all interested parties and pipeline companies under the jurisdiction of the NEB by Monday, October 20, 2014. FEI respectfully submits the following response and thanks the Board for the opportunity to provide comments.

On October 1, 2014, the Canadian Energy Pipeline Association (CEPA) submitted a letter of comment regarding the Proposed Amendments and requested a meeting with representatives from the NEB to further discuss the Proposed Amendments prior to the closure of the comment period.

FEI supports CEPA's comments. In addition FEI offers the additional comments.

Damage Prevention Regulations, Part 1:

- In Section 2 where "working day" is defined, FEI believes it would be useful to clarify whether "holiday" means a national or provincial (or both) holiday.

- In Section 3.1(2) a one-call centre is defined, FEI believes it would better off defined in Section 2.
- In Section 3.2, a “project owner” is discussed – FEI believes a definition of a project owner should be added in Section 2.
- In section 7.1(1) it states “...means the work of producing crops and raising livestock...”, FEI suggests the section should read “...means the work of producing crops **and/or** raising livestock...”

Damage Prevention Regulations, Part 2:

- In Section 3.1(2) a one-call centre is defined, this definition be moved to Section 2.
- In Section 4, FEI believes the amendments don't appear to spell out what the public's responsibilities are. The focus is on the activities required of a pipeline operator; yet do not address the responsibilities of the public.
- In Section 10.1(a) how are “low-risk conditions” defined? Levels of risk can be defined differently from person to person.

Should the Board schedule a meeting with interested parties and pipeline companies, FEI respectfully requests to be involved in those discussions.

If further information is required, please contact Ian Turnbull at (604) 592-7641.

Sincerely,

FORTISBC ENERGY INC.

A handwritten signature in blue ink, appearing to read "Diane Roy", with a long, sweeping underline.

For: Diane Roy

FILING RECEIPT | ACCUSÉ DE RÉCEPTION**The National Energy Board**

517 Tenth Avenue SW
 Calgary, Alberta
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L'Office national de l'énergie

517, Dixième Avenue S.-O.
 Calgary (Alberta)
 T2R 0A8

Filing ID | Id du dépôt : A63655

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**Submitter Information |
Renseignements sur le déposant :**

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Role | Rôle: Other | Autre

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Filing Information | Renseignements sur le dépôt :

Project | Projet : Other | Autre

Title | Titre : NEB Proposed Amendments to Regulations Pipeline Damage Prevention - FEI Response

NEB File Number | Numéro de dossier de l'ONÉ :

Hearing Order | Numéro d'audience :

Additional Contact(s) | Accusé transmis par courriel à :

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**Electronic Documents in this submission |
Documents électroniques visés par le présent dépôt :**

ID Id du doc.	Document Type Type de document	File Name Nom du fichier
A4D4J0	Letter Lettre	141020_NEB Proposed Amendments to Regs Pipeline Damage Prevention - FEI Response_FF.pdf

**Paper Documents in this submission |
Documents sur papier visés par le présent dépôt :**

Note | Nota : an electronic placeholder will be generated for each paper-only document. |
une référence électronique sera produite pour chaque document sur papier seulement.

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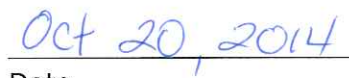
I hereby certify that I have electronically submitted the above documents to the National Energy Board. I also certify that the paper submission attached hereto is complete and contains accurate renditions of the electronic documents listed above and, where applicable, the requisite number of hard copies for each paper document listed above.

**Acceptation du dépôt/de la
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Je comprends les conditions générales concernant le dépôt de documents électroniques à l'Office national de l'énergie. Je renonce aux droits d'auteur en faveur de l'ONÉ et des tierces parties pour qu'ils utilisent les documents contenus dans le présent dépôt aux seules fins pour lesquelles les renseignements ont été fournis.

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Date