

April 18, 2016

Ms. Chantal Briand
Regulatory Approaches
National Energy Board
517 Tenth Avenue S.W.
Calgary, Alberta
T2R 0A8

Dear Ms. Briand,

RE: 30-Day Comment Period for National Energy Board Proposed Regulations for Pipeline Damage Prevention in *Canada Gazette* Part 1 (File Ad-GA-ActsLeg-Fed-NEBA-RRG-DPR 02 01)

On behalf of Niagara Gas Transmission Limited (“NGTL”) and 2193914 Canada Limited (“2193914”), Enbridge Gas Distribution Inc. (“EGD”) appreciates the opportunity to provide comments on the National Energy Board’s (“NEB”) Proposed Regulations for Pipeline Damage Prevention .

In general, EGD supports the proposed amendments as written, and provides the following additional comments to the NEB for their consideration.

National Energy Board Pipeline Damage Prevention Regulations – Obligations of Pipeline Companies

- Section 2 (1) states that if a pipeline company operates a pipeline within a geographical area where a one-call centre exists, the pipeline company must be a member of that centre. Clarification on membership requirements is requested in the case of an affiliate providing services on behalf of an NEB regulated company. In the case of NGTL and 2193914, Enbridge Gas Distribution provides damage prevention program services for these two companies and also is a member of Ontario One-Call, our provincial one-call call centre, and shares information on the NGTL and 2193914’s pipeline assets with them. Further, on behalf of NGTL and 2193914, EGD educates the public that live and work close to pipeline right-of-ways on the importance of Call Before You Dig. This initiative is part of ongoing public awareness activities.
- Section 16 (b) requires that the pipeline company will conduct ongoing monitoring of any changes in the use of the land on which a pipeline is located and the land that is adjacent to that land. Additionally, Section 16 (c) states that the pipeline company will conduct ongoing monitoring of any change in the landowner of the land on which a pipeline is located. Further clarity on the meaning of “monitoring” is requested for the purposes of this section. In addition, EGD wishes to highlight the complexities associated with land use and ownership monitoring in an urban environment with a significant number of landowners.

Regulations Amending the National Energy Board Onshore Pipeline Regulations

- Section 47.2 mandates that a company will be required to develop, implement and maintain a damage prevention program. Further clarity is sought on the use of the word “program”, and any implications that may be made by its use. Specifically, clarification is sought on whether the damage prevention program contemplated by Section 47.2 to be considered a component of a management system?

Enbridge Gas Distribution, on behalf of NGTL and 2193914, appreciates the opportunity to provide these comments to the Board. If you require further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Stephanie Allman".

For

Alexander Hadjis, M.Eng, P.Eng
Engineering Project Manager