



March 31, 2025

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Regulatory Policy, System Operations
Onshore Pipeline Regulations Review
Canada Energy Regulator
210 – 517 10th Ave SW
Calgary, Alberta T2R 0A8

Sent via email: ██████████

RE: TNPI Feedback Phase 2 Consultation Onshore Pipeline Regulations Review and Filing Manual

Trans-Northern Pipelines Inc. (TNPI) appreciates the opportunity to provide comment on the Canada Energy Regulator (CER) Onshore Pipeline Regulations (OPR) Review and Filing Manual Phase 2 Consultation in support of its modernization.

TNPI provided comments in the Phase I consultation and many of the original comments provided are still relevant within Phase 2. The OPR should continue to be focused on the safety and security of people and the environment throughout the lifecycle of a pipeline through safe operations. The comments below touch on many of the specific Topic Papers. Where TNPI has specific feedback to provide it will be outlined by the Topic Paper as noted in the attached “*OPR Topic Paper Specific Comments*”. TNPI respectfully requests the CER to consider the following during its review:

- Given the current political environment a focus of the CER should also consider Global Competitiveness as well as competitiveness within Canada.
- Revisions and the extent of revisions to the OPR must consider the type of activity and size (new construction versus operations and maintenance).
- OPR should not be too prescriptive, to allow regulated companies flexibility.
- Utilization of existing framework rather than creating new programs and additional requirements.
 - OPR s6 Management System.
 - Its processes are well defined and clear as noted in s6.1 and 6.5 respectively.
 - Framework already includes the Plan-Do-Check-Act (PDCA) which already has learning built into the process.
 - Current protection programs would already support advancement in Indigenous reconciliation.
 - Continuing to leverage the work completed through organizations such as Canadian Standards Association (CSA), an organization that maintains technical workgroups to evaluate the evolution and need of the industry.
 - Avoiding duplication of requirements in the OPR by referencing the technical standards and clauses (e.g. Patrols, Safety & Loss Management Systems, integrity Management Programs, Depth of Cover, records, etc.) ensures the OPR remains up-to-date and relevant.

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- Where there is duplication or overlap within existing regulations or standards, those should be removed from the OPR. TNPI Topic Paper Specific comments outlines examples where CSA covers expectations.
 - Engage with other Provincial, Territorial, Federal Agencies to assist companies navigating the different requirements and expectations from different regulators (overlapping jurisdictions). Example: contaminated sites, heritage resources.
 - Ensure alignment and consistency of the definitions between different CER publications/regulations, e.g. CER Event Reporting Guidelines, 'culturally significant sites' and 'sites of Indigenous significance'.

TNPI appreciates the opportunity to provide feedback. Should you have any questions please do not hesitate to contact me directly at [REDACTED]

Regards,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Trans-Northern Pipeline Inc.

Attachments (1)

OPR Topic Paper Specific Comments

CC.

[REDACTED]

TNPI Regulatory

[REDACTED]