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File No. 087362.77

March 26, 2025

BY ELECTRONIC FILING

Ms. Ramona Sladic
Secretary of Commission
Canada Energy Regulator
Suite 210, 517 10th Avenue SW
Calgary, AB T2R 0A8

Dear Ms. Sladic:

**Re: Application pursuant to subsection 335(4) of the *Canadian Energy Regulator Act* from the Regional Municipality of Peel involving TransCanada PipeLines Limited Cost Apportionment Application
CER File No. 5689143**

Enclosed is an application by the RM of Peel for cost apportionment under section 335(4) of the *Canadian Energy Regulator Act*. Please contact the undersigned with any questions.

Yours truly,

BORDEN LADNER GERVAIS LLP

A handwritten signature in black ink that reads 'Colm Boyle'.

Colm Boyle

CB

CANADA ENERGY REGULATOR

IN THE MATTER OF the *Canadian Energy Regulator Act*, SC 2019, c. 28, s. 10, as amended, and the *Canadian Energy Regulator Pipeline Damage Prevention Regulations - Authorizations*, SOR/2016-124;

AND IN THE MATTER OF an Application by The Regional Municipality of PEEL pursuant to section 335 of the *Canadian Energy Regulator Act* for an order authorizing construction of a facility across, on, along or under a pipeline, engagement in an activity that would cause a ground disturbance within the prescribed area of a pipeline, operation of a vehicle or mobile equipment across a pipeline and the apportionment of costs pertaining to TransCanada PipeLines Limited's Line 200-2 and Line 200-3 pipelines;

THE REGIONAL MUNICIPALITY OF PEEL

**APPLICATION FOR COST APPORTIONMENT PURSUANT TO THE CANADIAN
ENERGY REGULATOR ACT**

March 26, 2025

To: Ramona Sladic, Secretary
Canadian Energy Regulator
Suite 210, 517 Tenth Avenue SW
Calgary, Alberta
T2R 0A8

And to: TransCanada Pipelines Limited
Osler, Hoskin & Harcourt LLP
Sander Duncanson
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Calgary, Alberta, Canada T2P 1N2
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INTRODUCTION

1. On 11 June 2024, the Commission of the Canada Energy Regulator (“**CER**”) issued Order CCA-001-2024 granting certain authorizations to the Regional Municipality of Peel (“**RM of Peel**”) in respect of the road widening of Mississauga Road (“**Road Widening**”) across, on, along, or under pipelines operated by TransCanada PipeLines Limited (“**TCPL**”), specifically Line 200-2 and Line 200-3 (“**TCPL Pipelines**”). The Commission stated the following:

As noted in the Commission’s letter issued to the parties on 23 May 2024, the Commission confirms there is no need for the RM of Peel’s cost apportionment language in the attached Order. **The RM of Peel has the right to later apply to the Commission for cost apportionment; this right to seek the apportionment of costs is a statutory right.** The parties are however free to work together to negotiate an agreement on the costs, either amongst themselves or using the CER’s alternative dispute resolution services. [Emphasis added]

2. On 4 September 2024, the RM of Peel filed a notice of motion with the CER to compel TCPL to provide the RM of Peel with various information regarding the RM of Peel’s application for cost apportionment (“**Notice of Motion**”). The RM of Peel also requested that the CER commence adjudication of the RM of Peel’s application for cost apportionment under section 335(4)(g) of the *Canadian Energy Regulator Act*, which the Commission had held in abeyance since the initial application on 26 March 2024 until the RM of Peel provides written notice to the CER to proceed with setting a process to adjudicate this request for relief (“**Cost Apportionment Application**”). The RM of Peel requested an opportunity to amend the Cost Apportionment Application following the Commission’s ruling on the Notice of Motion.
3. On 25 October 2024, the Commission confirmed that it resumed the adjudication process for the Cost Apportionment Application and approved the RM of Peel’s request to file an amended cost apportionment application. The Commission directed TCPL to do the following:

The Commission is of the view that it would be difficult for the RM of Peel to file a new or amended Application clearly specifying the relief it is seeking with respect to cost apportionment and the factual basis for that relief without having the relevant information it needs to inform its Application. As such, **the Commission directs TCPL to provide directly to the RM of Peel all records in its possession that are relevant and material to the cost apportionment matter** by 8 November 2024. This information will be provided directly to the RM of Peel and not filed with the CER. [Emphasis added]

4. On 19 November 2024, TCPL filed a letter with the Commission erroneously claiming that it had filed all relevant and material records relating “...to the RM of Peel’s decision that

TCPL should proceed with replacing Line 200-2 or Line 200-3, which TCPL understands were driven by cost and the RM of Peel’s schedule.”

5. On 2 January 2025, the Commission directed TCPL to do the following:

The Commission is persuaded by the RM of Peel’s submissions that it is entitled to disclosure of all relevant and material documents related to this Cost Apportionment Application, including records which may provide reasoning to justify how TCPL decided to allocate all (or a portion) of the cost of its pipeline work to the RM of Peel. **The Commission therefore orders TCPL to conduct a reasonable search and provide the RM of Peel all relevant and material documents related to this Cost Apportionment Application, taking into account the nature of the information sought by the RM of Peel in its letters,** by 23 January 2025.

If TCPL determines that it has provided the RM of Peel with everything that is relevant or material and that no other documents exist that are material or relevant, including any additional material provided since the date of this letter after conducting a reasonable search, that could assist the RM of Peel in putting forth its new or amended Cost Apportionment Application, then **TCPL is further ordered to have the accountable officer of TCPL, appointed as Accountable Officer pursuant to section 6.2 of the Canadian Energy Regulator Onshore Pipeline Regulations, sign this declaration and file it with the CER by 23 January 2025.** [Emphasis added]

6. Despite an extension, TCPL never filed the declaration from its accountable officer with the Commission.
7. On 25 February 2025, counsel for the RM of Peel inquired as to the status of the declaration and received the following response from counsel for TCPL the same day, which states that TCPL did not provide all relevant and material documents and therefore did not sign the declaration:

“...our interpretation of Commission Ruling No. 1 is that TCPL was only required to provide a declaration if it determined that it had provided the RM of Peel with everything relevant or material and that no other documents exist that are material or relevant (Ruling No. 1, PDF 4 of 5). Since TCPL did not make such a determination (rather, TCPL determined that there were additional potentially relevant and material documents), it was not obligated to provide or file a declaration – hence why one was not filed or provided to the RM of Peel. We also interpret Commission Ruling No. 2 to be an extension of the deadlines set out in Ruling No. 1, not as creating an absolute obligation to file a declaration.”

Background Facts

8. The RM of Peel repeats and relies on paragraphs 5 to 30 and Appendices A to N of the application it filed on 26 March 2024. The RM of Peel reiterates the important point of clarification in paragraph 3 of its Reply Comments dated 7 October 2024 that it disputed, and continues to dispute, the apportionment of costs and TCPL's reasoning (including technical requirements or measures) for the replacement of the TCPL Pipelines.

Line 200-2

9. On 14 December 1978, the National Energy Board issued General Order No. 1, attached hereto as **Appendix A**. General Order No. 1 requires that certain conditions are to be made and adopted before the construction of a pipeline across a utility or highway.¹
10. On 27 July 1979, TCPL applied to the Board for a certificate of public convenience and necessity to construct and operate Line 200-2. The Board issued a certificate for construction of Line 200-2 in Reasons for Decision GH-6-79, attached hereto as **Appendix B**. Diagrams filed by TCPL for the construction of Line 200-2 acknowledged that the Mississauga Road "crossing shall be constructed in accordance with National Energy Board General Order No. 1".² General Order No. 1 contains the following indemnity from TCPL to the RM of Peel:

The Applicant, shall, from time to time and at all times hereafter, well and truly save, defend and keep harmless and fully indemnify the authority having control over the highway or utility or the owner, from time to time, of the utility, as the case may be, from and against all loss, costs, damage, injury and expense to which the said authority or owner may at any time or times hereafter be put by reason of any damage or injury to persons or property caused by the construction, maintenance or operation of the Applicant's pipeline, as well as against any damage or injury resulting from the negligence, imprudence, neglect or want of skill of the employees or agents of the Applicant in connection with the construction, maintenance, operation, renewal or repair of the said Applicant's pipeline, unless the cause of such loss, cost, damage, injury or expense can be traced elsewhere.

11. The Board acknowledged in GH-6-79 that population density was increasing in the vicinity of Line 200-2 and segments of the existing Line 200-1 may require replacement. Significant urban development was foreseeable even when the pipeline was approved in 1980.³ General Order No. 1 has not been repealed or rescinded and continues to apply to the construction of new pipelines, including Line 200-3.

¹ Filing C11312-1, File OF-Fac-Oil-T260-2013-03 61, Trans Mountain Pipeline ULC, ORDER OP-004-2021, 29 January 2021, online: <<https://apps.rec-cer.gc.ca/REGDOCS/File/Download/4039077>>

² Filing C28945, File 5689143, Regional Municipality of Peel Application, 26 March 2024, at Appendix F & G, online: <<https://apps.rec-cer.gc.ca/REGDOCS/File/Download/4442801>> and <<https://apps.rec-cer.gc.ca/REGDOCS/File/Download/4442802>>

³ Reasons for Decision GH-6-79 at pages 3-2, 3-3, and 3-7.

Line 200-3

12. On 8 November 2011, TCPL filed its application to construct Line 200-3.⁴ The following aspects of the application are relevant for cost apportionment:
- (a) TCPL submitted that the Project would be designed, constructed, and operated in accordance with the OPR-99, Canadian Standards Association Z662 Oil and Gas Pipeline Systems (CSA Z662), and all other applicable acts, codes, and regulations.⁵ TCPL did not state anywhere in the application that Line 200-2 or Line 200-3 had been designed in accordance with American Lifelines Alliance guidelines or to account for pipeline bends or wall thickness transitions underneath structures.
 - (b) TCPL stated that heavy wall pipe will be used for all active road crossings.⁶ TCPL did not, in fact, install heavy wall pipe at the Mississauga Road crossing.⁷
 - (c) TCPL's consultation log shows that it consulted with the RM of Peel and was aware of the Road Widening project at Mississauga Road.⁸
 - (d) TCPL's Socio-Economic Assessment acknowledged that local roads in the project area are capable of accommodating heavy vehicle traffic.⁹ Line 200-3 was installed by horizontal directional drilling to minimize traffic disturbances.¹⁰
 - (e) TCPL estimated the cost of installing 12.9 km of Line 200-3 at \$85,900,000 (approximately \$6.7 million per kilometer).¹¹ Compare this cost with the 183 metres¹² of pipeline replacement at Mississauga Road at a cost of \$11,791,171.30

⁴ Filing A35884, File OF-Fac-Gas-T211-2011-02 01, TransCanada PipeLines Limited, 8 November 2011, online: <<https://apps.rec-cer.gc.ca/REGDOCS/Item/View/752993>>

⁵ Filing A41680, File OF-Fac-Gas-T211-2011-02 01, National Energy Board – Letter Decision, 22 May 2012, online: <<https://apps.rec-cer.gc.ca/REGDOCS/File/Download/817841>>

⁶ Filing A2H6Z5, File OF-Fac-Gas-T211-2011-02 01, TransCanada PipeLines Limited - Engineering and Appendix 4-1, at page 8, 8 November 2011, online: <<https://apps.rec-cer.gc.ca/REGDOCS/File/Download/753003>>

⁷ Filing C23909, TransCanada PipeLines Limited - OM2023-130-TransCanada PipeLines Limited - Notification of Operation and Maintenance Activities, Attachment 2, online: <<https://apps.rec-cer.gc.ca/REGDOCS/File/Download/4360744>>

⁸ Filing A2H7A6, TransCanada PipeLines Limited, Section 7 – Stakeholder Engagement and Appendices 7-1 to 7-3-2, 8 November 2011, in particular see page 9 online: <<https://apps.rec-cer.gc.ca/REGDOCS/File/Download/753036>>; See also Filing A2K9R3, IR Responses by TCPL, 12 January 2012, at page 37, online: <<https://apps.rec-cer.gc.ca/REGDOCS/File/Download/781585>>

⁹ Filing A2H7D0, TransCanada PipeLines Limited, Section 7 – Appendix 9-2, 8 November 2011, at section 7.6.1.1, online: <<https://apps.rec-cer.gc.ca/REGDOCS/File/Download/753045>>

¹⁰ Filing A2H7D4, TransCanada PipeLines Limited, Section 9 – Appendix A, 8 November 2011, at page 2, online: <<https://apps.rec-cer.gc.ca/REGDOCS/File/Download/753057>>; See also Section 5 – Construction, at section 5.1.1, online: <<https://apps.rec-cer.gc.ca/REGDOCS/File/Download/753030>>

¹¹ Filing A2H6Z4, TransCanada PipeLines Limited, Section 3 – Economic Supply Market and Alternatives, 8 November 2011, at s.3.3.7, online: <<https://apps.rec-cer.gc.ca/REGDOCS/File/Download/753000>>

¹² Filing C23909-3, OM2023-130 - Notification of Operation and Maintenance Activities, 3 April 2023, online: <<https://apps.rec-cer.gc.ca/REGDOCS/File/Download/4364487>>

(approximately \$64.4 million per kilometer) that was installed by open cut. In interrogatory response RM of Peel 1.4(e), which has not yet been filed with the Commission, TCPL states the cost of single-line replacement and double-line replacement was estimated to be substantially the same within the margins of Class 3 (+30%/-20%) cost estimates.

13. On 22 May 2012, the Board issued a Letter Decision attaching Order XG-T211-008-2012 the effect of which was to approve Line 200-3.¹³ The Board stated that when a company designs, constructs, operates or abandons a pipeline, it must do so in accordance with the National Energy Board's *Onshore Pipeline Regulations, 1999* ("OPR-99"), the commitments made and the conditions attached to any approval. The OPR-99 references various engineering codes and standards including CSA Z662. The CSA Z662 engineering code requires designers to consider the possibility of future development in the area whose class location designation is being determined, including the design, pressure testing, operation, and maintenance of the pipeline.¹⁴
14. During IRs, the Board was concerned about the change in operation of Line 200-2 from initial design. In particular, the Board identified the potential for stress corrosion cracking resulting from a change to bidirectional use of the TCPL Pipelines, something that was not accounted for in the initial design of Line 200-2.¹⁵ To satisfy the Board's concerns, TCPL committed to additional ILI before and following commencement of bidirectional operation to address existing pipeline integrity.¹⁶
15. Importantly, the Board found that TCPL's consultation activities on Line 200-3 were inadequate. The Board was not confident that TCPL would follow through with ongoing consultation obligations throughout the project lifecycle:

Based on the evidence on the record, the Board finds that TransCanada's efforts to live up to its stakeholder engagement principle were inadequate. The Board is of the view that TransCanada failed to design and implement a consultation program that was appropriate for this Project. **TransCanada did not address all of the concerns raised by stakeholders in the design,** it did not implement timely and comprehensive information sharing and it did not adequately follow-up with parties when concerns were raised.

[...]

¹³ Filing A41680, File OF-Fac-Gas-T211-2011-02 01, National Energy Board – Letter Decision, 22 May 2012, online: <<https://apps.rec-cer.gc.ca/REGDOCS/File/Download/817841>>

¹⁴ CSA Z662 Commentary on Table 10.1.

¹⁵ Filing A2L3G7, File OF-Fac-Gas-T211-2011-02 01, IR Response NEB IR 1.1, 20 January 2012, online: <<https://apps.rec-cer.gc.ca/REGDOCS/File/Download/784195>>

¹⁶ Filing A41680, File OF-Fac-Gas-T211-2011-02 01, National Energy Board – Letter Decision, 22 May 2012, at page 3, online: <<https://apps.rec-cer.gc.ca/REGDOCS/File/Download/817841>> Filing A2Q3U8, File OF-Fac-Gas-T211-2011-02 01, IR Response NEB 2.3, 21 February 2012, online: <<https://apps.rec-cer.gc.ca/REGDOCS/File/Download/792143>>;

Consultation is an ongoing process and the Board expects TransCanada to continue consultation throughout the regulatory process, construction, operation and abandonment and to take appropriate steps to address concerns raised throughout the lifecycle of the Project. The Board notes TransCanada's commitment to ongoing consultation with potentially affected people for the duration of the Project; however, the Board is not confident that TransCanada will follow through on this commitment.

16. The Board appears to have been justified in its concerns about TCPL's lack of consultation. Aside from the Road Widening that TCPL had been aware of, adjacent land-use increased densification planning was already well underway prior to construction of Line 200-3, as shown in **Appendix C**.¹⁷

Grounds for the Application

Relevant Legislation Under Which Application is Made

17. Pursuant to the Commission's Ruling No. 2, the RM of Peel is filing this cost apportionment application in accordance with section 335(4)(g) of the *Canadian Energy Regulator Act* and sections 14 to 16 of the *National Energy Board Rules of Practice and Procedure, 1995*.
18. The RM of Peel requests the Commission do the following:
 - (a) Set a process schedule to hear the cost apportionment application;
 - (b) Clarify that the burden of proof rests with TCPL, not the RM of Peel, to prove the following elements to demonstrate costs were directly incurred by TCPL in relation to the Road Widening:
 - (i) Need – Did TCPL justify the need for the project? Has sufficient evidence demonstrating need been provided by TCPL? Did TCPL fail to adequately consult, fail to appropriately plan, or commit errors in the design of the TCPL Pipelines?
 - (ii) Project Alternatives – Did TCPL justify the identified need is best addressed by the project, having adequately considered all viable alternatives?
 - (iii) Project Cost and Economics – Did TCPL provide sufficient evidence to demonstrate the costs of the project were reasonable? How do the costs of the projects compare with recent similar projects?

¹⁷ City of Brampton, Block Plan Layout, 20 May 2011, online: <<https://www.brampton.ca/en/Business/planning-development/Documents/PLD/Block%20Plans/Mount%20Pleasant%20Block%20Plan%2051-1.pdf>>

- (iv) Prudence – Considering all the circumstances, were the costs incurred and actions of TCPL prudent? Does TCPL have sufficient summaries, records and bookkeeping to justify the costs?
 - (v) Allocation – Were prudently incurred costs directly incurred as a result of the RM of Peel’s Road Widening that was authorized under section 335 by the Commission? Are there other contributing or driving factors underlying the replacement of the TCPL Pipelines?
 - (vi) Depreciation – Is the RM of Peel responsible for: (i) all prudently incurred costs directly incurred as a result of the Road Widening; or (ii) the depreciated value of prudently incurred costs directly incurred as a result of the Road Widening?
 - (vii) Conditions of Approval – Do the conditions of approvals for TCPL Pipelines affect any of the foregoing?
- (c) Clarify that TCPL’s failure to follow the Commission’s directions and orders on disclosure of information to the RM of Peel will result in the Commission drawing an adverse inference; and
 - (d) Issue an order for interim costs to the RM of Peel for reasonably incurred legal costs for obtaining crossing Order CCA-001-2024 and disclosure from TCPL for cost apportionment pursuant to section 335(4)(g) of the *Canadian Energy Regulator Act*.

Burden of Proof Rests with TCPL

19. The CER states that cost apportionment is new for the CER and each situation will be site specific and unique to the parties impacted by the apportionment of costs.¹⁸ In this application, TCPL initiated the replacement of the TCPL Pipelines and purports to allocate 100% of those costs to the RM of Peel.
20. The RM of Peel disagrees with TCPL’s apportionment of costs. TCPL is, in effect, unreasonably demanding that local residents in Brampton, Mississauga, and Caledon pay for the replacement of the TCPL Pipelines.
21. Since TCPL alleges the costs for the replacement of the TCPL Pipelines should be paid 100% by the RM of Peel, it follows that the burden of proof rests with TCPL to establish on a balance of probabilities that this relief should be granted by the Commission. If TCPL does not establish that costs associated with the replacement of the TCPL Pipelines were directly incurred as a result of the RM of Peel’s Road Widening, then none of the

¹⁸ CER, Section 335 Applications – Guiding Principles for Cost Apportionment, online: <<https://www.cer-rec.gc.ca/en/safety-environment/damage-prevention/conducting-activities-near-pipelines/section-335-applications-guiding-principles-cost-apportionment.html>>

\$11,791,171.30 in costs claimed by TCPL should be allocated to the RM of Peel. There is not a presumption of prudence.

22. The indemnity in General Order No. 1 pertaining to Line 200-2 and 200-3 further supports the position that the burden of proof rests with TCPL. General Order No. 1 includes an indemnity from TCPL to the RM of Peel that applies unless the cause of such loss, cost, damage, injury or expense can be traced elsewhere.
23. The burden of proof did not shift from TCPL to the RM of Peel as a result of amounts paid by the RM of Peel under the Pre-Engineering Agreement¹⁹ or the Final Engineering, Procurement, and Construction Agreement.²⁰ The amounts paid by RM of Peel were on a without prejudice basis and subject to cost apportionment by the Commission. The RM of Peel submits that it was inappropriate for TCPL to take the position, and contrary to explicit direction from the CER, that it would not issue crossing consent until its commercial demands were met. The CER is clear that pipeline companies can only deny consent for safety reasons.
24. While not within the scope of this application, the RM of Peel is aware that the CER is consulting on the Onshore Pipeline Regulations, Filing Manuals, and Rules of Practice and Procedure. It may be helpful if the CER require pipeline companies to provide a CER prescribed 1 page outline of the application process and guiding principles for crossing authorization and cost apportionment under section 335 of the *Canadian Energy Regulator Act* to those who plan to conduct activities near federally-regulated pipelines. Many municipalities and utilities who do not routinely participate in CER processes are unaware of this alternative relief under section 335 of the *Canadian Energy Regulator Act*.

TCPL Disclosure Refusal and Costs

25. The refusal by TCPL to comply with the Commission's order to conduct a reasonable search and provide the RM of Peel all relevant and material documents related to the cost apportionment application, taking into account the nature of the information sought by the RM of Peel in its letters, is concerning to the RM of Peel. TCPL acknowledges there were additional potentially relevant and material documents that were not provided to the RM of Peel.
26. The RM of Peel is of the view that seeking further process direction from the Commission on disclosure may not be productive given that TCPL has not complied with directions or orders of the Commission. The direction from the Commission in its 25 October 2024 letter and orders on 2 January 2025 Ruling No. 1 were clear. Accordingly, the RM of Peel is asking the Commission to draw an adverse inference.²¹

¹⁹ Filing C28945-12, File 5689143, Regional Municipality of Peel Application – Appendix L, 26 March 2024, online: <<https://apps.rec-cer.gc.ca/REGDOCS/File/Download/4442804>>

²⁰ Filing C28945-13, File 5689143, Regional Municipality of Peel Application – Appendix M, 26 March 2024, online: <<https://apps.rec-cer.gc.ca/REGDOCS/File/Download/4441914>>

²¹ For example, see Order MO-010-2022 – Reasons for Decision, 17 March 2022, online: <<https://apps.rec-cer.gc.ca/REGDOCS/File/Download/4239090>>

27. Furthermore, the RM of Peel is asking for the Commission to issue an interim costs award to the RM of Peel for reasonably incurred legal costs for obtaining crossing Order CCA-001-2024 and disclosure from TCPL for cost apportionment. The RM of Peel has incurred substantial costs pursuing this matter. TCPL unreasonably refused to grant crossing consent, was unsuccessful in opposing the RM of Peel's crossing order, and now refuses to comply with directions and orders of the Commission. The only obvious purpose of this conduct by TCPL is to deter others from pursuing relief under section 335 of *Canadian Energy Regulator Act* and cannot be condoned by the Commission.
28. With respect to the documents that have been provided by TCPL, the RM of Peel will advise the Commission of what documents it intends to rely on when replying to TCPL evidence and/or submissions on its proposed allocation of costs. The RM of Peel is not obligated to guess or speculate about what reasons may be provided by TCPL to support its purported allocation of costs before it is delivered.

Notices

29. Communications in respect of this Application should be directed to:

The Regional Municipality of Peel
Michelle Wong
Deputy Regional Solicitor
10 Peel Centre Drive
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L6T 4B9
Telephone: 905.791.7800

Email: michelle.wong@peelregion.ca

AND TO:

Borden Ladner Gervais LLP
Colm Boyle
Bay Adelaide Centre, East Tower,
22 Adelaide St. W,
Toronto, Ontario
M5H 4E3
Telephone: 416.367.7273

Email: CBoyle@blg.com

ALL OF WHICH IS RESPECTFULLY SUBMITTED THIS 26th DAY OF MARCH, 2025

BORDEN LADNER GERVAIS LLP

A handwritten signature in black ink, appearing to read "Colm Boyle". The signature is written in a cursive style with a large initial "C".

Per: _____
Colm Boyle

Counsel to The Regional Municipality of
Peel