



THE CANADIAN
BAR ASSOCIATION
L'ASSOCIATION DU
BARREAU CANADIEN

December 9th, 2024

Via email: carol.gagne@cer-rec.gc.ca

Carol Gagné

Dear Ms.Gagné:

Re: Commission of the Canada Energy Regulator (CER) Rules of Practice and Procedure Review – Discussion Paper

We write on behalf of the CBA's National Environmental, Energy, and Natural Resources Law Section Executive (**NEERLS**) regarding CER's invitation to comment on CER's initiative to modernize the [National Energy Board Rules of Practice and Procedure, 1995](#) (the Rules) governing the procedures to be followed during written or oral hearings of the CER, previously the National Energy Board.

As a leading forum for environmental, energy, and natural resource practitioners focused on legal reform and education, NEERLS is very interested in CER's initiative and looks forward to future phases of CER's engagement efforts and consultation process, including CER's intended Summary Report for Publication and Comment, anticipated to be released in the Winter of 2025, and CER's Draft Regulation anticipated to be published for comment in Canada Gazette in the fall of 2025. NEERLS anticipates that it may have specific comments and feedback during those future phases of CER's engagement process, and requests that CER continue to keep NEERLS apprised of its efforts.

NEERLS generally supports CER's objective of modernizing the Rules. NEERLS is particularly interested in how CER will focus on specific practices, procedures, and processes that CER thinks can be improved and the supporting guidance that CER intends to provide to facilitate a clear understanding of the Rules in written and oral hearings to enable practical implementation.

We look forward to working with CER as this initiative progresses. Thank you for the opportunity to make this submission.

Sincerely,

Yours truly,

Jennifer Fairfax, on behalf of the
National Environmental, Energy, and Natural Resources Law Section