

VIA ELECTRONIC SUBMISSION

December 10, 2024

Canada Energy Regulator
Suite 210, 517 Tenth Avenue S.W.
Calgary, Alberta T2R 0A8

To: Rumu Sen, Project Manager

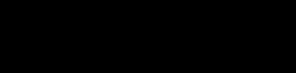
Dear Ms.Rumu Sen:

Re: Trans Mountain Response to Rules of Practice and Procedure Review

Please find enclosed Trans Mountain's response to the CER's discussion paper on the Rules of Practice and Procedure Review.

Should you have any questions or wish to discuss this matter further, please contact the undersigned at regulatory@transmountain.com or (403) 514-6400.

Yours truly,



Ian Eldred
Regulatory Affairs Specialist
Trans Mountain Canada Inc.

Enclosure:

Rules of Practice and Procedure Review – Discussion Paper , Phase 1 - Trans Mountain Response

Trans Mountain Pipeline ULC (Trans Mountain)

Commission of the Canada Energy Regulator Rules of Practice and Procedure Review – Discussion Paper Phase 1 – Early Engagement

Issued Date: September 9, 2024

Due Date: January 31, 2025

The [National Energy Board Rules of Practice and Procedure, 1995](#) (the Rules) govern the procedures to be followed during written or oral hearings of the Commission of the Canada Energy Regulator (CER), previously the National Energy Board (see Appendix A for hearing types). Among other things, the Rules set out the mechanisms for complaints, the conduct of public hearings, and determine the manner in which applications are to be assessed. A comprehensive update to the Rules is needed to align with the [Canadian Energy Regulator Act](#) (CER Act), which came into force in 2019. The update will reflect the CER's new governance structure, and formalize the practices, processes, and terminology which have evolved since the Rules were first in effect. The Rules are made by the Commission under the CER Act (section 35).

For this update, the Commission, supported by CER staff, will focus on specific practices, procedures, and processes that can be improved in the Rules and supporting guidance. Guidance is information (e.g., practice notes, documents, letters) which accompanies legislation or regulations, and it is intended to provide clarity and guide the actions of those who must follow our requirements and processes. In instances where feedback is provided on topics that are beyond the scope of this review, CER staff will ensure it is managed appropriately (i.e., documented, responded to, shared with the appropriate staff, and/or retained for future updates to the Rules, other regulatory instruments, or guidance). For example, some processes that affect Indigenous Peoples may require significantly more consultation before revisions are made to the Rules. In that type of situation, the current review may serve as a first step to inform further engagement on a future update or guidance document.

Regulatory Objectives

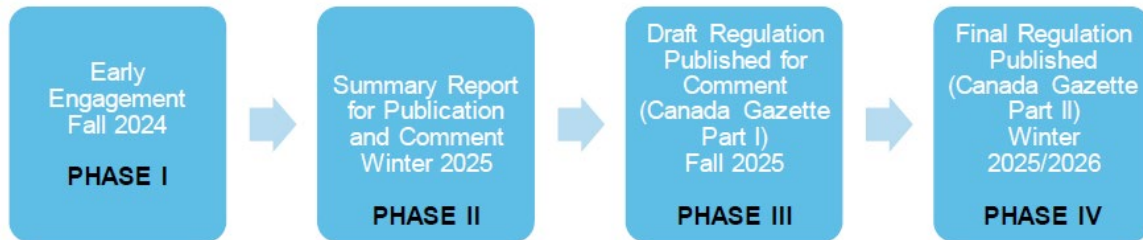
In broad terms, the objective of the Rules Review is to deliver regulations that:

- align with the CER Act, including the objectives outlined in the Act's preamble, such as the commitment to Reconciliation;
- enhance competitiveness through predictable and timely processes; and
- modernize practices and procedures.

Engagement

The Commission is committed to ensuring that its work, and the decisions it makes, are informed by diverse input from people across Canada. Engagement on federal regulatory development initiatives is informed by the Government of Canada's [Cabinet Directive on Regulation](#), which calls for meaningful consultation and engagement with Indigenous Peoples and impacted stakeholders throughout the development, management, and review of regulations.

On the Rules Review, the Commission has planned for four phases of engagement, each of which is described below. All opportunities for engagement will be posted on the CER's [Consultation and Engagement Activities webpage](#).



Note: timelines are tentative

Phase I - Early Engagement: in Fall 2024, feedback will be sought from Indigenous Peoples, companies, and other stakeholders relating to potential amendment areas and improvements to the Rules. The format of engagements (e.g., written communications, small meetings, workshops) will be responsive to the preference of those to be engaged. In this phase, funding will be made available to support the participation of eligible Indigenous Peoples. More information about this funding can be found [here](#).

Phase II - Summary Report: following the first phase of engagement, a report will be published which summarizes the feedback received and how it will be addressed. Interested parties will have an opportunity to comment on the publication or provide additional feedback once it is shared. In addition to the report, any written submissions received during early engagement will be published online for transparency purposes.

Phase III - Canada Gazette I: the draft amended Rules will be published in Canada Gazette allowing interested parties to review and comment on the draft regulatory text. Previously engaged parties will be directly notified of the publication by CER staff.

Phase IV - Canada Gazette II: the final regulation will be published in Canada Gazette II. Previously engaged parties will be directly notified of the publication by CER staff.

Potential Amendments and Engagement Questions

To support Phase I engagement, this Discussion Paper further describes the type and scope of amendments that are currently being considered under each of the regulatory objectives listed above. Specific engagement questions are also included to seek feedback on potential amendments.

Interested parties are welcome to provide feedback on topics of interest that are not explicitly mentioned below. The Commission is in the early stages of regulatory development and anticipates that engagement will aid in identifying additional areas of improvement. Engagement is also intended to inform the potential development of guidance to accompany the regulations.

Align with the CER Act, including the objectives outlined in the Act's preamble, such as the commitment to Reconciliation.

Various updates are required to align the Rules with the CER Act, which came into place in 2019. In addition to minor administrative updates, such as term and section changes, the Commission is also considering what changes are required to reflect new or amended authorities that were provided to the Commission through the CER Act.

Compensation and Cost Apportionment: Through the CER Act, the Commission was given the authority to decide compensation (CER Act, ss. 327 and 334) and cost apportionment (CER Act, ss. 335(4)(g)) disputes (see Appendix A for description). Currently, these processes are supported by guidance, but not reflected in the Rules. The Commission is considering the incorporation of standard process steps for these application types in the amended Rules. For example, an applicant for a compensation or cost apportionment matter may be required to serve their application on the company within a specific timeframe. The Commission's expectation that parties try to come to an agreement individually first would remain and the use of [alternative dispute resolution](#) services encouraged.

Reconciliation and Implementation of the United Nations Declaration on the Rights of Indigenous Peoples: The Commission is also considering what changes may be needed to ensure that the Rules are aligned with the CER Act's objectives and preambular statements related to achieving Reconciliation and implementing the United Nations Declaration on the Rights of Indigenous Peoples (UN Declaration). In 2021 the [United Nations Declaration on the Rights of Indigenous Peoples Act](#) came into force in Canada. The Act directs the federal government to take steps to ensure that all federal laws are consistent with the UN Declaration. The Act is supported by an [Action Plan](#), which includes a specific Action Plan Measure (Action Plan Measure 34) related to the participation of Indigenous Peoples in projects and matters that are regulated by the CER.

Indigenous Knowledge: Since 1995, when the Rules came into force, the way Indigenous Peoples participate in CER hearings has evolved. Through the Rules Review, the Commission is considering whether the Rules sufficiently allow for a process to provide and protect Indigenous knowledge that is procedurally fair and is able to evolve. The Commission recognizes that, as participants, Indigenous Peoples are best placed to choose what information to share with the Commission and how to share it. The Rules should be sufficiently flexible to allow Indigenous Peoples to make those choices. With the introduction of the CER Act, the consideration of Indigenous knowledge by the Commission has become a formal legislative requirement (CER Act, ss. 183(2)). Although the provision and consideration of Indigenous knowledge has been part of CER (previously the National Energy Board) hearings for many years, Indigenous knowledge sessions are one of the procedural steps that has evolved. The Commission's goal in its hearings is to create opportunities for meaningful gathering of information, which requires flexibility, while also ensuring procedural fairness. The CER Act also introduced specific provisions for protecting the confidentiality of Indigenous knowledge, when requested (CER Act, s. 58). The Commission takes into consideration these provisions, as well as the Government of Canada's [Indigenous Knowledge Policy Framework for Project Reviews and Regulatory Decisions](#) when they set processes related to Indigenous knowledge. The Rules Review provides an opportunity to consider whether parts of the procedural aspect of receiving Indigenous knowledge belong in the Rules.

Crown Consultation: The Commission's hearing process is the primary forum for Crown consultation with Indigenous Peoples for matters before the Commission. For matters where the CER determines that supplemental Crown consultation is appropriate (generally for projects where the Commission is not the final decision maker), the CER's Crown Consultation Coordinator (CCC) conducts additional consultation with Indigenous Peoples to supplement the Commission's process. The CCC's role is a relatively new

one and continues to evolve. Within the Rules Review, the Commission is considering whether and how the Rules should address the role of the CCC in Commission hearings. For instance, the amended Rules could clarify or formalize certain procedural steps related to the CCC's participation in hearings (e.g., that submissions are filed on the public hearing record, the timelines for reply). For more information about the CCC, please refer to the CER webpage for [CER Crown Consultation](#).

Discussion Questions:

- 1) Are there specific process steps for cost apportionment applications that you would like to see made mandatory through the Rules?
- 2) Are there specific process steps for compensation applications that you would like to see made mandatory through the Rules?
- 3) Do you have feedback regarding how the Rules could incorporate process steps for providing and protecting Indigenous knowledge within hearings?
- 4) Would you like to see the role of the Crown Consultation Coordinator, and nature of its participation in Commission hearings reflected in the Rules? If so, how?
- 5) Do you have other feedback related to how the Commission can align the Rules with the CER Act, including the objectives outlined in the Act's preamble, such as the commitment to Reconciliation, and the UN Declaration?

Trans Mountain Response

- 1) Trans Mountain's position is that cost apportionment and compensation applications should meet an evidentiary threshold criterion as early as possible in the process to affirm their validity and substantiate claims effectively. For instance, all applications must clearly outline the issue, provide a demonstration of the claim, include a rationale for compensation, and incorporate maps or physical location data where applicable. The CER may want to consider a document checklist similar to ones included in the *Filing Manual* which detail the minimum information required in the respective application types. Complete applications improve process efficiency by reducing time to obtain missing information, thereby facilitating timely and effective assessments and decisions.
- 2) Please refer to the response to question 1, above.
- 3) The manner, form or format in which Indigenous knowledge is shared, or the need to protect such information from public disclosure can vary significantly across Indigenous communities that participate in hearings. Trans Mountain supports the referenced framework as it permits for this flexibility. Where it is deemed necessary for Indigenous knowledge to be protected from public disclosure, Trans Mountain would encourage for the CER to establish a standardized process establishing information needs, the timelines to consider confidentiality requests, including potential triggers for extensions, and conditions by which confidential information should be handled by the regulator and proponent. By adopting a standardized process, the CER can streamline the submission, handling, and evaluation of Indigenous knowledge in a timely and predictable fashion, while respecting boundaries of the community.
- 4) Trans Mountain observes that the creation of the position of the Crown Consultation Coordinator (CCC) is relatively new, and while it has not yet interfaced with the CCC role in an adjudicative process, it has interfaced with Natural Resources Canada while it was undertaking Indigenous consultation to fulfill its consultation mandate for the Trans Mountain Expansion Project. In that

experience, Trans Mountain observed the importance of relationship building between the community and the government, and believes that where possible, the CCC should aim to have an established baseline relationship or familiarity with the community in advance of project-specific consultations. While difficult to prescribe in the Rules, in Trans Mountain's view, the success of Crown Consultation is likely to be correlated to the extent of the relationship with the Indigenous community. Relationship building between the Crown and Indigenous communities is in alignment with the intent of Indigenous Reconciliation. To support this process, the Rules should provide clear guidelines on the CCC's roles and duties. Additionally, the CCC can enhance its impact by collaborating and coordinating with provincial agencies, fostering a more cohesive and coordinated approach to engagement and consultation efforts.

- 5) Trans Mountain believes that incorporating a preamble into the Rules, consistent with the preamble of the CER Act, would reiterate the purpose and intent. This approach would maintain flexibility within the process to ensure it remains responsive to the needs of both participants and the regulator.

Enhance competitiveness through predictable and timely processes.

Updating Processes: The Commission intends to update the Rules so that they are reflective of current processes, which have changed since the Rules were first in effect. Certain Rules requirements are no longer consistent with current hearing practice. For example, the current Rules tie several process steps to the issuance of a hearing order (notice of public hearing, applying to participate). This does not allow for flexibility in the way that process steps are sequenced, as hearing orders are not always issued as a first step, especially in instances when participant funding is being issued. The Commission intends to address these inconsistencies through the Rules Review. Other processes that have evolved since the Rules were first in effect include the CER's responsibilities in the North and Offshore. For example, the Commission holds hearings pursuant to the *Canada Oil and Gas Operations Act*. The current Rules do not include specific provisions that apply to hearings under legislation other than the CER Act, so the Rules Review is an opportunity to clarify the processes used in those situations.

Enhancing Competitiveness: In addition to ensuring that the Rules are reflective of current processes, the Commission is also considering what changes could be made to improve and streamline processes and further enhance competitiveness. For example, the Commission will examine all timelines set in the Rules and consider whether new time limits should be added. In certain instances, timelines may be shortened and in others they may be extended. For example, the CER has received feedback that same day service is not always feasible when filing right of entry applications (Rules, ss. 55(2)). The Commission is also considering changes to the approach for computation of time (Rules, s. 5-7), as the utilization of "business days" as opposed to "calendar days" may be clearer for participants.

The Commission will also be considering:

- Making changes to modernize the notice of motion procedure (Rules, s. 35) to support efficiency, including the use of oral notice of motion processes where appropriate.
- Whether the existing process for fixing costs related to detailed route hearings (Rules, s. 53-54) requires updates and if it can be applied to other instances where parties require a Commission decision on costs.
- If there are processes that have become standardized enough that they could be written into the Rules to create continuity, efficiency, and certainty for interested parties.

- Whether specific changes could be made to the information request process (Rules, s. 32-33) to clarify how it is used and to support efficiency.
- Where learnings can be applied from other regulators and tribunals, for example where there are particular rules at other regulators or tribunals that support efficient processes.

Discussion Questions:

- 6) Do you have any suggested changes to the Rules to reflect hearings pursuant to the Canada Oil and Gas Operations Act or other legislation?
- 7) Do you have feedback with regards to any timelines set in the Rules, additional timelines you would like to see added to the Rules, or the approach for computation of time (Rules, s. 5-7)?
- 8) Do you have feedback related to the notice of motion process or suggested changes to support efficiency? Do you have feedback on the use of oral notice of motion processes to support efficiency?
- 9) Do you have feedback on the current process for fixing costs related to detailed route hearings?
- 10) Are there processes that you would like to see written into the Rules?
- 11) Do you have feedback regarding changes that could be made to the information request process to clarify its use and support efficiency?
- 12) Can you identify rules of other regulators or tribunals that support efficiency and could inform the Commission's Review?
- 13) Do you have other feedback related to how the Commission can update the Rules to enhance competitiveness through predictable and timely processes?

Trans Mountain Response

- 6) Trans Mountain notes there are process steps that can take place outside of the hearing order (such as notices of motion or confidentiality requests), for which the Commission will be required to render a decision on to facilitate subsequent process steps. When faced with condensed timelines, Trans Mountain has experienced the circumstance where an intervenor has issued an information request which is due ahead of a decision on a motion, where the decision on motion is material in how Trans Mountain may respond. In this case, and to respect timelines, Trans Mountain must respond on an assumptive basis which then leads to additional work once a ruling is issued to ensure Trans Mountain's filings align with the CER ruling. The consequence to the proponent is lack of process certainty and additional burden especially in the circumstance of a large number of information requests. Trans Mountain recommends establishing a service standard that would limit the issuance of information requests that pertain to a matter subject to a motion until after the CER has rendered a decision on the motion.

To enhance process certainty and adherence to timelines, it may be beneficial for the CER to consider reinforcing filing deadlines and introducing an early notification requirement for extension requests. Trans Mountain has generally observed that extension requests are sometimes submitted near the end of the response period, and these are often accommodated. While such flexibility is important in certain situations, it can occasionally contribute to delays. Encouraging early submission of extension requests and ensuring they undergo thorough consideration could foster a more predictable and efficient process for all participants.

While not specific to the Rules nor the hearing process, the CER may also want to consider the processes and timelines in relation to field inspections or compliance verification activities (CVAs). With respect to CVAs, Trans Mountain has experienced a substantial lag in the issuance of draft reports - in some cases, Trans Mountain has received draft reports from CER staff upwards of two (2) years after the inspection has taken place.¹ In this instance a notice of non-compliance (NNC) was issued in regard to contractor oversight. The challenge in this circumstance is that the activity which is being inspected is completed and crews have demobilized when draft report is issued, eliminating the ability to address the issue on a timely basis. Trans Mountain notes that the CER has clear timelines for all process steps associated with audits, which creates process and timeline certainty for all involved. The CER may want to consider a similar process or service standard for field and non-field CVAs.

- 7) Please refer to the response to question 6, above.
- 8) Trans Mountain supports the use of oral notices of motion but stresses the importance of mechanisms to ensure their traceability. Additionally, the CER should clearly define the situations in which oral notices of motion are applicable to prevent any confusion. Moreover, it is important to clarify how the Commission envisions oral notices of motion working in conjunction with written motions. Establishing a clear framework for the integration of oral and written notices of motion will enhance efficiency and transparency in the Rules. Please also see response to question 6, above.
- 9) The term 'reasonably incurred' as mentioned in section 53 of the Rules necessitates clarification, including definition of eligible costs. The current lack of definition does not support collaboration between parties and a proponent. Trans Mountain has encountered instances where landowners have commissioned studies or surveys independently, without the Company's prior knowledge. This situation leads to fees being negotiated simultaneously with landowners, which precludes the opportunity to assess the reasonableness of the fees or the qualifications and scopes of these consultants, which may be inappropriate or incorrect. Additionally, implementing a pre-approval process where landowners must seek approval before commissioning studies or surveys can help prevent unexpected costs. Establishing clear timelines for when costs should be discussed and agreed upon to ensure that all parties are on the same page from the beginning. Setting standards for the qualifications and scopes of work for consultants will further reduce the risk for inappropriate or erroneous work.
- 10) Trans Mountain does not have any guidance on any specific topic related to the Rules Review at this time.
- 11) Where the information need is more complex, and could be better addressed through discussion (and in consideration of any condensed timing needs), Trans Mountain recommends that the CER consider expanding the use of technical conferences or information exchanges to complement the information request process. For complex matters, or in the case where the company is proposing the use of novel or uncommon technology, a face-to-face discussion may result in a better understanding of the issue. Further, the CER could issue minutes in relation to those discussions to ensure transparency. Trans Mountain suggests that the CER develop an Information Request Guideline document and provide templates to aid intervenors, who may not engage as frequently with the CER process as proponents. These resources would support the submission of thorough and properly referenced information requests and the formulation of

¹ The CER delayed the issuance of a report to Trans Mountain, which was eventually received on October 24. Furthermore, the CER did not issue the NNC, resulting in its status appearing as expired on the record. If this NNC had been enforceable, Trans Mountain would have lacked the necessary information and historical context to implement corrective actions effectively, given that the contractor had already been demobilized, 2024-10-24, CV2223-237.

comprehensive information request responses. In relation to an impending hearing process, the CER may also consider hosting a webinar for members of the public to understand the process steps, including that for information requests and responses

- 12) Please refer to the response to question 20, below.
- 13) Trans Mountain suggests consideration of virtual public hearings in the Rules. Current regulations assume in-person participation, which can exclude remote communities and may not ensure inclusivity and sensitivity for individuals or groups who may prefer not to attend formal hearing rooms.

Discussion Questions:

- 14) Do you have feedback regarding the modernization of requirements to allow for electronic filing and service in most instances?
- 15) Do you have feedback regarding the potential removal of signature requirements in certain instances (e.g., physical signatures on applications and notice of motions)?
- 16) Do you have feedback regarding removal of the current requirement for the company/applicant and the CER to have a hard copy of project applications on site for public inspection (Rules, s. 24)?
- 17) Do you have feedback regarding what type of notice publication requirements are appropriate in a digital age and where Commission approval is necessary?
- 18) Do you have feedback related to how the Rules could better support accessibility to and throughout Commission processes?
- 19) Do you have other feedback on how the Commission can update the Rules to modernize practices and procedures?

Modernize practices and procedures.

Electronic Filing and Service: The Commission intends to make changes to the Rules that will allow for the modernization of various practices and procedures. Current requirements necessitate that when a person files a document with the Commission by electronic means, that they follow up with an original hard copy document within a reasonable period after the document is filed (Rules, ss. 9(8)). Similarly, the Rules require that when a person serves a document by electronic means, the person shall provide an original hard copy of the document to the person served within a reasonable period of time (Rules, ss. 8(9)). The Commission is considering modernizing these requirements to allow for electronic filing and service, without the subsequent provision of hard copies, where it makes sense to do so. These changes would not apply to instances where personal service is required.³ To ensure accessibility, hard copy filing and service would remain an option, but it would not be mandated in all cases. With the potential move to electronic filing and service, the Commission is also considering removing signature requirements in certain instances (e.g., physical signatures on applications and notice of motions).

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- When companies are making an application for right of entry, personal service of the notice on the owner of lands not less than 30 days and not more than 60 days before the date of application.
 - When a subpoena is being issued for a person to appear before the Commission.

Access to Project Applications: The Commission is also considering removing the current requirement for the company/applicant and the CER to have a hard copy of project applications on site for public inspection (Rules, s. 24). Rather, interested parties could make requests on a case-by-case basis for a copy of the application or view it online at any time.

Publication of Notices: Within the Rules there are certain requirements for applicants to publish notices. For example, in instances where the Commission has issued a notice of public hearing, there is a requirement for applicants to publish the notice in such publications as the Commission may direct (Rules, ss. 23(2)). Applicants must also publish plan, profile, and book of reference (PPBOR) notices for pipelines and international/interprovincial power lines. A sample of the PPBOR notice, and the list of publications in which the applicant proposes to publish the notice, must be approved by the Commission in advance of publication (Rules, s. 50). Through the Rules Review, consideration will be given to what type of publication requirements are appropriate in a digital age, where Commission approval is necessary for notices, and whether amendments should be made to the current requirements or supporting guidance.

Accessibility: In addition to the modernization of specific practices and procedures, the Commission is also considering whether specific changes should be made to the Rules to ensure accessibility to and throughout Commission processes (e.g., for persons with disabilities). The Commission intends for the amended Rules to be clear for everyone. Plain language techniques will be used where possible within the Rules and associated guidance to support clarity.

Trans Mountain Response

- 14) Trans Mountain supports a transition to electronic filing and service, generally eliminating the need for a hard copy to be submitted. However, Trans Mountain notes that in some cases there are instances where physical copies are still required, such as stamped copies of Plan Profile and Book of Reference. Trans Mountain recommends that the CER consider clear guidance on which submissions will continue to require physical copies be submitted.
- 15) Trans Mountain supports the shift towards the removal of signature requirements. Companies are increasingly using programs (such as Docusign) which requires verification and agreement of the signatory to apply a program-generated generic signature. The benefit is that the process ensures the necessary steps are undertaken, while protecting the personal signature of the signee from public disclosure. In Trans Mountain's view this is appropriate under all circumstances, including Accountable Officer attestations.
- 16) Trans Mountain supports the removal of the current requirement for the company/applicant and the CER to have a hard copy of project applications on site for public inspection. A company could print a hard copy for a member of the public upon request.
- 17) As it is common for companies to have websites that describe their business, provide important information about the company, and to have resources and contact information, among other types of information, Trans Mountain supports forgoing formal notice of publication of notices. However, through external engagement efforts a pipeline company should recognize the diversity of needs in the communities it operates in and remain flexible to those needs in its communication approach.
- 18) Trans Mountain supports the usage of plain language in the Rules along with implementing beneficial modifications to the Rules to enhance accessibility within the Commission processes to ensure accessibility of this information to all Canadians.

- 19) Concomitant to modernizing the Rules, the CER may want to consider improvements and/or modernization of the usability and capacity of submission platforms like REG DOCS and Efile. Currently, REG DOCS only permits users to upload a maximum of 20 documents per session, with individual file sizes capped at 50 MB and only PDF submissions accepted. The Efile submission platform currently only allows document uploads up to 21 MB each, requires each document to be uploaded separately rather than in bulk, and necessitates the completion of drop-down language fields for each document, thereby reducing upload efficiency. Considering the complex documentation uploaded by users on these submission platforms, there is a critical need to widen the file types that can be uploaded, increase the file sizes of documents that can be submitted, and introduce user efficiencies that can accelerate and optimize the upload and submission process.

Other Feedback:

As noted above, interested parties are welcome to provide feedback on topics of interest that are not explicitly mentioned in this Discussion Paper. The Commission is in the early stages of regulatory development and anticipates that engagement will aid in identifying additional areas of improvement. Engagement is also intended to inform the potential development of guidance to accompany the regulations.

Discussion Questions:

- 20) Is there other feedback or suggestions you have related to the Rules Review?
- 21) Would you like to see guidance on any specific topic related to the Rules Review?

Trans Mountain Response

- 20) Trans Mountain recommends that the CER introduce user efficiencies into its filing platforms, as the practical efficacy of the rules will often depend on the tools used to facilitate them. One example that may be beneficial is the eRFI platform used by the European Commission.⁴ This platform includes a deadline extension request feature, which could streamline the process of seeking extensions without the need to submit a letter to the Commission. This feature could ensure that extension communications are simultaneously sent to all intervenors and participants, thereby achieving notification. Additionally, the platform could include a section requiring justification for an extension request. Other useful features could include an opt-out option for intervenors who no longer wish to be registered, and the ability to submit confidentiality requests over the platform.
- 21) Beyond the responses provided, Trans Mountain does not have any guidance on any specific topic related to the Rules Review at this time.

⁴ <https://wikis.ec.europa.eu/display/ERFI/Step+2%3A+Contact+Details>