



January 30, 2025

Rumu Sen
Regulatory Policy
Canada Energy Regulator
210 – 517 10 Ave SW
Calgary, AB T2R 0A8

Sent via email: rppr@cer-rec.gc.ca

RE: TNPI Feedback - Comment Period on Rules of Practice and Procedure Review

Trans-Northern Pipelines Inc. (TNPI) appreciates the opportunity to provide feedback on the Rules of Practice and Procedure Review and provides the following for CER consideration:

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

CER Question 3) Do you have feedback regarding how the Rules could incorporate process steps for providing and protecting Indigenous knowledge within hearings?

TNPI Response:

The CER should consider that individual Indigenous communities may have differing recommendations to industry regarding the protection of Indigenous knowledge.

Recommendation: CER allow for individual Indigenous communities and industry to establish Indigenous knowledge sharing and protection protocols that work for each party.

CER Question 4) Would you like to see the role of the Crown Consultation Coordinator, and the nature of its participation in Commission hearings reflected in the Rules? If so, how?

TNPI Response:

Recommend the CER avoid being overly prescriptive to ensure all parties have the ability to situationally adapt to different projects and various activities.

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TRANS-NORTHERN PIPELINES INC.

CER Question 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?

TNPI Response:

Recommend the CER avoid being overly prescriptive to ensure all parties have the ability to situationally adapt to different projects and various activities.

CER Section Heading: Modernize practices and procedures.

CER Question 14) Do you have feedback regarding the modernization of requirements to allow for electronic filing and service in most instances?

TNPI Response:

TNPI is supportive of the ability to submit electronic filings and agrees it modernizes the requirements. In addition, TNPI recommends not having to file hard copies after the electronic filing of the submissions/applications where appropriate.

CER Question 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)?

TNPI Response:

TNPI supports not having to have hard copies on site; should have easy reference and access to documents as required

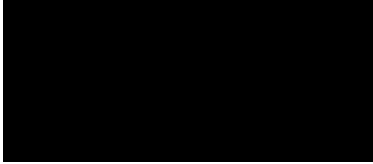
CER question 17) Do you have feedback regarding what type of notice publication requirements are appropriate in a digital age and where Commission approval is necessary?

TNPI Response:

Placement of digital ad versus print ads is likely to reach a broader audience, so recommendation would be to allow for the flexibility for placement of the notifications through digital ad buys with mainstream media publications.

Thank you for the opportunity to provide feedback. Should you have any questions please do not hesitate to contact Lee Nanos at 289-548-5421 or lnanos@tnpi.ca or the undersigned at 403-464-9955 or jfisher@tnpi.ca.

Sincerely,



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cc.

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