

December 17, 2007

Mme. C. Dutil-Berry, Secretary
National Energy Board
444 Seventh Avenue S.W.
Calgary, Alberta
T2P 0X8

S.L.L.
2007 DEC 18 A 9:02

Dear Mme. Dutil-Berry:

Re: Amendments to the *Onshore Pipeline Regulations, 1999 (OPR)* and *National Energy Board's Processing Plant Regulations (PPR)* and *Guidance Notes and Exemption Order – Decommissioning Provisions*

In response to your invitation for comments, the Canadian Energy Pipeline Association (CEPA) wishes to make the following submissions on the Board's letter of November 16, 2007 which set out proposed regulatory requirements for the decommissioning of pipelines and related facilities.

In its letter, the Board drew a distinction between "abandonment" and "decommissioning", with the former described as relating to "the discontinuance of service". Procedurally, abandonment applications would continue to be addressed under section 74 of the *National Energy Board Act*, while decommissioning activities would be made subject to a new application mechanism under the *Onshore Pipeline Regulations, 1999*.

The Board further proposes the issuance of an amendment to the OPR's and PPR's requiring companies to seek approval to decommission facilities, to allow the Board to examine the application, to ensure safe operation and service to continue to end users and the opportunity to assess the environmental effects of the project.

CEPA appreciates the Board's desire to invoke a regulatory process for certain other decommissioning activities that might have more significant engineering, environmental, or economic implications.

CEPA is pleased to see that the Board has taken into consideration the comments offered in its letter of March 6, 2003 and as such we have no further comments or concerns with the proposed changes to the OPR and PPR regulatory text.

CEPA will however be taking the opportunity to forward its comments and builds on the proposed Guidance Notes and Exemption Order prior to the January 15, 2008 deadline.

Should the Board wish to arrange a meeting, please contact Roel Lancée of TransCanada PipeLines Limited (as the coordinator of this response letter) by telephone 920-7069 or by email at roel_lancee@transcanada.com.

Sincerely,



K.J. (Kim) McCaig,
Vice president, Operations

cc: CEPA Regulations & Standards Work Group
CEPA Operations Standing Committee
