

Stakeholder comments on AUC Rule 020 proposed changes

(on September 21, 2017 version)

Stakeholders: ATCO Pipelines, Acting Property Rights Advocate

Section	Stakeholder Comments	AUC Responses
2	Participant involvement	
2.2(4)	<p>Acting Property Rights Advocate:</p> <p>How is notice to be provided? 14 days may not be sufficient unless that timeline is from the time the documents were hand delivered.</p>	<p>Notice from the applicant would be mailed or hand delivered.</p> <p>The AUC expects that the applicant would still consider comments received after the 14 day time period and advise the AUC of any late objections.</p>
2.2(5)	<p>Acting Property Rights Advocate:</p> <p>I assume there is public notice in the form of a newspaper ad, otherwise how is an "other" party to be made aware of the proposal?</p>	<p>For larger projects a newspaper ad is generally utilized by the applicant. For smaller projects the notification may be distributed only by mail or hand delivery.</p>
General	<p>Acting Property Rights Advocate:</p> <p>I recommend the utility company keep records of complaints and how each was addressed. This table could be used for future reference in the event there is a discrepancy and could protect both the utility company and the property owner. These records should be maintained and similar records added to the file if any complaints arise during operations. i.e. nature of complaint, response, confirmation that 'response' occurred where mitigating action is required/agreed to.</p>	<p>The AUC also expects the utility companies to retain records of complaints or concerns and how they were addressed.</p>
3	Establish project need	

Section	Stakeholder Comments	AUC Responses
4 Gas utility pipeline license application process		
4.1 (4)	<p>Acting Property Rights Advocate: See general comments RE: Section 2 above</p>	<p>The AUC expects the utility companies to retain records of complaints or concerns and how they were addressed.</p>
5 Application audit		
6 Gas utility pipeline – general information		
Table 6.1 (old Table 7.1)	<p>ATCO Pipelines:</p> <p>ATCO believes Table 7.1 and Table 7.2 need to be re-numbered to Table 6.1 and Table 6.2 as a result of re-numbering the old Section 7 to Section 6 in the September 21, 2017 draft version. Several references throughout Rule 020 would also need to be updated to reflect the change from Section 7 to Section 6.</p> <p>ATCO believes that the Type 100 Description (third column) should be less than or equal to 323.9 mm (\leq) and not less than ($<$).</p> <p>ATCO agrees with the changes to Type 100 Notification requirements between the June 26, 2017 draft version and the September 21, 2017 draft version.</p> <p>ATCO appreciates the changes in the September 21, 2017 draft to not require confirmation of non-objection from “directly adjacent” parties and that only personal consultation is required. However, ATCO is still concerned with the extensive process this will result in. As an example, for a proposed Type 101</p>	<p>The AUC agrees that the numbering for the tables and sections will require updates.</p> <p>The AUC agrees that that Type 100 should be less than or equal to 323.9 mm (\leq) and not less than ($<$).The terminology reflects this correctly when the tracked changes are accepted.</p> <p>The AUC acknowledges the additional consultation process and considers that personal consultation is necessary for landowners, occupants and residents directly adjacent to the right-of-way for pipelines</p>

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	<p>application in an urban community, this will require personal consultation with, in some cases, several thousand parties. As an example, ATCO has estimated that on an upcoming UPR connector project the additional consultation requirements would result in a cost increase of approximately \$300,000.</p>	<p>larger than NPS 12 as they are generally more likely to be potentially impacted in the event of a rupture. The AUC recognizes that this process may result in higher consultation costs, particularly for urban projects. This type of consultation has been a long-standing requirement for electric transmission facility owners.</p> <p>A footnote to Table 6.1 was added to clarify that personal consultation for “directly adjacent” properties is not required for abandonment or removal activities unless requested by the notification recipient .</p>
6.8 Technical Requirements	<p>ATCO Pipelines:</p> <p>ATCO requests that the Commission provide clear instructions on additional information required recently at the time of application in support of the use the Alberta Energy Regulator’s OneStop System.</p>	<p>The AUC will continue to work with gas utility pipeline owners and the AER during the implementation process for the AER OneStop System.</p>
7 Gas utility pipeline licence applications		
8 Gas Utility Pipeline Licence Application form		
Ground Disturbance	<p>Acting Property Rights Advocate</p> <p>Should be defined</p>	<p>The AUC will footnote ground disturbance as defined in the Pipeline Act.</p>
9 Pipeline Segment/Pipeline Installation Identification form		

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10 Flaring, incinerating and venting requirements		
11 Performance requirements		
12 Venting and fugitive emissions management requirements		
13 Records		
14 Definitions		
	Ground Disturbance needs a definition	The AUC will footnote ground disturbance as defined in the Pipeline Act.
15 General storage requirements		

Section	Stakeholder Comments	AUC Responses
16	Requirements for aboveground storage tanks	
17	Requirements for underground storage tanks	
18	Storage requirements for containers	
19	Storage requirements for bulk pads	
20	Inspection, monitoring, and record-keeping requirements	
21	Withdrawal of storage tanks from service	

Section	Stakeholder Comments	AUC Responses
22 Impervious liners		
Appendix 1 – Definitions		
Appendix 2 – Sample participant involvement summary form		
Appendix 3 – Storage requirements for existing pipeline installations		