

May 15, 2013

Alberta Utilities Commission  
Fifth Avenue Place  
4th Floor, 425 - 1 Street SW  
Calgary Alberta T2P 3L8

**Attention: Brian Shand**  
**Director, Gas Facilities**

**Re: Review of Pipeline Integrity Management and Emergency Procedures Manual**

This letter is in response the Review of Pipeline Integrity Management (TIMP) undertaken by the Alberta Utilities Commission (AUC or the Commission) and forwarded to AltaGas Utilities Inc. (AUI) on April 2, 2013. Correspondence in regards to the review of AUI's Emergency Procedures Manual will be forwarded under separate correspondence.

Having reviewed the AUC consultant's review of AUI's Pipeline Integrity Management Manual (TIMP), it is apparent virtually all comments from, or deficiencies noted by, BHT Serge Consulting Ltd. (BHT) would have been fully addressed through reference to other AUI policy and operational not included with the material forwarded to the AUC on August 24, 2012.

In particular, AUI notes the original request for the TIMP, dated August 20, 2012, specifically requested only the above noted documents. However, AUI's approach in developing its TIMP Manual was to create a reference document, rather than duplicating specific details contained in various other documents within AUI. This was done to avoid complications with versioning, change management etc. inherent with keeping several separate copies of information. The Policies, Methods and Procedures, as outlined in AUI's TIMP, do, in fact, align with the standards used by BHT in assessing AUI's TIMP.

Had the AUC provided further information concerning the intended use or objectives underlying its August 20, 2012, request, AUI submits the BHT review would have been of greater assistance in assessing AUI's compliance with Sections 7 and 8 of the Pipeline Regulation. As it stands, AUI submits the review is of limited, if any, benefit; given the supporting material was not included in the review. Were all supporting documentation taken into account, AUI submits it would be found to be in compliance with the prescribed requirements.

In addition to the foregoing and as indicated in AUI's telephone conversation with AUI Staff on April 23, 2013, AUI's intention is to provide the AUC with copies of the supporting documentation referenced in its TIMP Manual. Further, as indicated, AUI is currently undertaking an extensive rewrite of its Standard Practice Manual (SPM) which contains the majority of material referenced in its TIMP. As the pertinent sections are rewritten and approved, AUI will distribute them to the AUC. AUI anticipates completion of all remaining sections before the end of 2014.

In the interim, should the AUC or AUC staff have any questions or require further clarification, please do not hesitate to call me at your convenience (780) 980-6720.

ALTAGAS UTILITIES INC.

Per:

Nathan Lesage, P. Eng.  
Director, Engineering Services