



Office national de l'énergie

File OF-Surv-Compl-C293-01 11 June 2014

Mr. Todd Karry President Centra Transmission Holdings Ltd. 1085 Suffield Avenue Birmingham, MI 48009 Facsimile 519-652-0428

Dear Mr. Karry:

Centra Transmission Holdings Ltd. (Centra) National Energy Board Order SG-C293-002-2012 – Condition 6

On 6 December 2012 the National Energy Board (Board) issued Order SG-C293-002-2012 (Order) to Centra in regards to the adequacy of its Safety, Integrity, Environmental Protection, and Emergency Management programs. Condition 6 of the Order states:

Prior to 31 December 2013, Centra shall file for approval, the audit reports and corrective action plans for its environment, safety, emergency management and integrity programs.

The Board is in receipt of Centra's third party Audit Report and Corrective Action Plan (CAP) submitted as required by Condition 6 of the Order. The Board approves the Audit Report and CAP filed by Centra, subject to the direction the Board has provided in the attached Table 1: Board Response to Centra's Proposed Corrective Action Plan.

Centra must file with the Board the applicable information with respect to each corrective action by the dates stipulated in Table 1. The Board will determine whether the individual corrective actions are effectively implemented during future compliance activities.

Yours truly,

Original signed by

Sheri Young Secretary of the Board

Attachment

c.c. Mr. Joe Brophy, Vice President, Centra Transmission Holdings Ltd 2324 Main Street, London, ON N6P 1A9, facsimile 519-652-0428



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TABLE 1

Board Response to Centra's Proposed Corrective Action Plan

The Board has reviewed Centra's proposed corrective actions for each finding in the third party Audit Report. In order to promote compliance and clarify Board expectations, where required, the Board has provided additional direction in this response.

Centra is required to file written confirmation of completion of these corrective actions by the dates indicated. The corrective actions will be evaluated to verify the adequacy of implementation and suitability in future NEB compliance verification activities.

1.1 Integrated Management System

Audit Finding: Policies and Goals

Recommendation from Centra Audit

Centra complies with the requirements under s. 6.3 of the *National Energy Board Onshore Pipeline Regulations* (OPR) with the exception of the requirement to state the immunity from disciplinary action obligation as required under s. 6.3(1)(a) in a policy statement. They do include this statement as part of their Integrated Management System (IMS) course material delivered to each employee.

Proposed Corrective Action

Centra will modify its policy statement or include this statement in its IMS documentation.

Board Response

As this recommendation was not included in Centra's Corrective Action Plan (CAP), the Board directs Centra to complete this corrective action as stated above prior to 31 July 2014.

1.2 Integrated Management System

Audit Finding: Roles and Responsibilities

Recommendation from Centra Audit

Since this is new requirement in 2013, there has not been an annual report submitted to the NEB. Centra has stated in its 2014 Goals and Objectives that the Accountable Officer will submit an annual report to the NEB by 30 April 2014. This requirement will also be added to the Roles and Responsibilities for the President of the company as the Accountable Officer.

Proposed Corrective Action

Centra will modify the Roles and Responsibilites of the Accountable Officer to include the signing of the annual report.

Board Response

As this recommendation was not included in Centra's CAP, the Board directs Centra to complete this corrective action as stated above prior to 31 July 2014.