



Canada Energy
Regulator

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du Canada

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File OF-Surv-Gen-T217 01
29 December 2023

Lee Nanos
Trans-Northern Pipelines Inc.
310 - 45 Vogell Road
Richmond Hill, ON L4B 3P6

Dear Lee Nanos:

**Trans-Northern Pipelines Inc.
Order AO-001-SO-T217-03-2010, as amended
Application to vary Conditions 3.c and 8.e engineering assessment
submission deadlines for the 2023 calendar year pursuant to section 69 of the
Canadian Energy Regulator Act**

**Before: K. Penney, Presiding Commissioner; T. Grimoldby, Commissioner;
W. Jacknife, Commissioner**

On 5 December 2023, the Commission of the Canada Energy Regulator received an application from Trans-Northern Pipelines Inc. (**TNPI**) to vary the 31 December filing deadlines established by Conditions 3.c and 8.e of Order AO-001-SO-T217-03-2010, as amended, for the 2023 calendar year (**Application**). TNPI requested an extension to 30 April 2024. The Commission grants TNPI's request.

Conditions 3.c and 8.e of Order AO-001-SO-T217-03-2010, as amended, require TNPI to prepare and file annual engineering assessments for each pipeline section listed in Schedules C and D, respectively.

In support of its variance request, TNPI submitted that it experienced information technology issues in November 2023, which constrained its internal systems, including communication with external parties. TNPI stated that completing the annual engineering assessments involves significant time and expense, including the engagement of an external engineering firm and the use of TNPI staff and resources. TNPI further explained that a cybersecurity incident hindered TNPI's ability to easily retrieve files and exchange data electronically with consultants and vendors, delaying the generation of the engineering assessment reports and resulting in hard-copy file exchanges, which took additional time. TNPI stated that electronic conference calls were also impacted, which hindered collaborative discussions and required additional time. Further, internal TNPI resources focused on sustaining pipeline integrity-related activities.

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TNPI submitted that the safe operation of its pipeline system will not be negatively impacted by the requested variance. TNPI provided a list of pipeline integrity activities that it has completed on the pipeline system in 2023 to maintain the fitness-for-service of the pipelines listed in Schedules C and D. The Commission finds that these activities are appropriate to enable TNPI to collect the necessary data in support of its 2023 engineering assessment filings and to maintain the safe operation of the pipeline system, as required by Order AO-001-SO-T217-03-2010, as amended.

Based on TNPI's submissions and a review of TNPI's previously filed engineering assessments for the pipeline sections listed in Schedules C and D, the Commission finds that extending the filing deadlines for the engineering assessments required by Conditions 3.c and 8.e of Order AO-001-SO-T217-03-2010, as amended for the 2023 calendar year, from 31 December 2023 to 30 April 2024, does not raise safety or environmental concerns and is justified in the circumstances. The extension only applies for the 2023 calendar year, such that the 31 December filing deadlines set out in Conditions 3.c and 8.e apply for the 2024 calendar year and subsequent calendar years.

Yours sincerely,

S. Wong for

Ramona Sladic
Secretary of the Commission

c.c. Jane Keast, TNPI
Gail Sharko, TNPI