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Ms. Sheri Young, Secretary of the Board  
National Energy Board  
Suite 210, 517 Tenth Avenue SW  
Calgary, AB T2R 0A8  
8 March 2019

Dear Ms. Young:

**RE: Draft Pipeline Financial Requirements Guidelines**

The Canadian Energy Pipeline Association (CEPA) would like to thank the National Energy Board (NEB) for the opportunity to provide input on the Draft Pipeline Financial Requirements Guidelines (Draft Guidelines). CEPA and its members are encouraged by the level of engagement that has taken place on regulations pursuant to the *Pipeline Safety Act* and will continue to participate in consultations with the NEB and other relevant government bodies.

Generally, the Draft Guidelines provide the appropriate level of guidance and will be helpful in ensuring compliance with the Pipeline Financial Requirements Regulations. We do however have the following minor comments for your consideration:

1. The requirement to file annual updates to Financial Resources Plans should be changed from March 31 to April 30 to align with other NEB reporting requirements.
2. Requirements to update Table 1 in the Draft Guidelines should explicitly state that companies that do not have a requirement to provide the NEB with audited financial statements do not need to base their updates on audited financial statements.

Thank you again for the opportunity to provide input into the Draft Guidelines. Please contact Kai Horsfield at [khorsfield@cepa.com](mailto:khorsfield@cepa.com) or by phone at 403.221.8755 if you have any questions or concerns regarding the above remarks.

Yours sincerely,

Jen Campbell  
Vice President, Business Environment