



ATCO Gas and Pipelines Ltd. (South)

**Transfer of Pipelines from NOVA Gas Transmission Ltd. to
ATCO Gas and Pipelines Ltd. (South)
Tranche 2a**

November 2, 2016

Alberta Utilities Commission

Decision 21379-D21-2016

ATCO Gas and Pipelines Ltd. (South)

Transfer of Pipelines from NOVA Gas Transmission Ltd. to

ATCO Gas and Pipelines Ltd. (South)

Tranche 2a

Proceeding 21379

Applications 21379-A001 to 21379-A017

November 2, 2016

Published by the:

Alberta Utilities Commission

Fifth Avenue Place, Fourth Floor, 425 First Street S.W.

Calgary, Alberta

T2P 3L8

Telephone: 403-592-8845

Fax: 403-592-4406

Website: www.auc.ab.ca

ATCO Gas and Pipelines Ltd. (South)
Transfer of Pipelines from NOVA Gas Transmission Ltd.
to ATCO Gas and Pipelines Ltd. (South)
Tranche 2a

Decision 21379-D21-2016
Proceeding 21379
Applications 21379-A001 to 21379-A017

1 Decision summary

1. In this decision the Commission must decide whether to approve 17 licence transfer applications filed by ATCO Gas and Pipelines Ltd. (South) (ATCO). These applications relate to the exchange, or swap, of certain transmission pipeline assets between ATCO and NOVA Gas Transmission Ltd. (NGTL) approved by the Alberta Utilities Commission¹ and by the National Energy Board (NEB).² The pipeline assets have been divided into four groups, referred to in this decision as tranches. This decision relates specifically to the transfer of the Tranche 2a pipeline assets from NGTL to ATCO. For the reasons outlined in this decision, the Commission finds that approval of the Tranche 2a licence transfer applications is in the public interest having regard to the social, economic, and other effects of the project, including its effect on the environment.

2 Introduction and background

2.1 Summary of previous “asset swap” proceedings

2. NGTL and ATCO entered into the Alberta System Integration Agreement in April 2009. This agreement required ATCO, and NGTL, subject to regulatory approvals, to swap ownership of certain physical pipeline assets within distinct operating territories or “footprints” in Alberta (asset swap), and to work together in Alberta under a single rates and services structure, while maintaining separate ownership, management and operation of their assets.

3. The asset swap was approved in principle by the Commission in Decision 2010-228³ and the NEB Decision RHW-1-2010. When evaluating the asset swap and considering whether the no harm test was satisfied, the Commission considered the overall benefits of integration when weighed against specific costs identified in the asset transfer approval application and decided that the requirement of the no harm test was met as it relates to concerns regarding service quality, reliability and increased costs to customers.

4. Under the asset swap, ATCO is transferring 393 pipeline segments totaling 1,249 kilometres (km) in length to NGTL and is receiving 171 pipeline segments totaling

¹ Decision 2012-310: ATCO Gas and Pipelines Ltd. - Asset Swap Application, Proceeding 1723, Application 1608166, November 22, 2012.

² Exhibit 21379-X0098, NGTL – Integration Assets Transfer.

³ Decision 2010-228: ATCO Pipelines – 2010-2012 Revenue Requirement Settlement and Alberta System Integration, Proceeding 223, Application 1605226, May 27, 2010.

1,440 km in length from NGTL. ATCO will also acquire 85 net⁴ new meter stations and will transfer one compressor station.⁵

5. The Commission considered ATCO's asset swap application in Proceeding 1723 and approved that application in Decision 2012-310. In that decision the Commission found as follows:

Based on its review of the evidence in this proceeding, the Commission is satisfied that AP has met the requirement of the no harm test, specifically as it relates to concerns regarding service quality, reliability, and increased costs to customers, which has been applied by the Commission in determining whether to approve a disposition under Section 26(2)(d) of the *Gas Utilities Act*.

...Nevertheless, the implications of the Asset Swap for rate-making purposes should not be construed as approved by this decision and remain subject to further scrutiny and determination in AP's next general rate application(s).⁶

6. The Commission considered the rate impacts of the asset swap in Decision 3577-D01-2016.⁷ In that decision, the Commission approved the one-time capital, operating and maintenance costs, and ongoing operating and maintenance cost increases associated with the swapped assets. The Commission accepted a placeholder amount of zero for the resulting net book value balance, on the premise that any differences in net book value would be trued-up in a future proceeding.

7. ATCO and NGTL decided to transfer these assets to each other in four tranches. The asset swap was commercially completed by ATCO and NGTL on September 1, 2016,⁸ with the exchange of assets in Tranche 4. The remaining steps in the process include completion of land rights transfers, finalization of the licence transfer process, and monetary adjustments.

8. ATCO filed the 17 licence transfer applications for the Tranche 2a pipeline assets with the Commission pursuant to Section 9 of the *Pipeline Act* and Section 4.1 of the *Gas Utilities Act*. The Tranche 2a pipeline assets are listed in Schedule A to this decision.

9. The Commission issued interim licences, with an expiry date of November 30, 2016, to ATCO for the pipelines being transferred from NGTL in order to facilitate licencing records for the operating pipelines.

2.2 The current applications

10. The Tranche 2a licence transfer applications were registered as applications 21379-A001 to 21379-A017 on March 1, 2016. On March 18, 2016, the Commission issued a notice of

⁴ ATCO will gain 115 additional stations and lose 30 stations to NGTL as a result of the asset swap.

⁵ Decision 3577-D01-2016, ATCO Pipelines 2015-2016 General Rate Application, Proceeding 3577, paragraph 243.

⁶ Decision 2012-310: ATCO Gas and Pipelines Ltd. - Asset Swap Application, Proceeding 1723, Application 1608166, November 22, 2012, paragraph 52.

⁷ Decision 3577-D01-2016: ATCO Pipelines – 2015-2016 General Rate Application, Proceeding 3577, February 29, 2016.

⁸ NGTL's asset swap application was approved by the NEB on October 16, 2014.

application via email to registered parties on Proceeding 1723, which dealt with previous aspects of the integration and asset swap arrangements between ATCO and NGTL.

11. The Consumers' Coalition of Alberta (CCA) filed a statement of intent to participate which outlined its concerns with respect to the application. On June 1, 2016, the Commission issued a ruling on the CCA's participation status. The Commission decided to grant the CCA limited participation rights in relation to the following issues:

To ensure that the assets added have been fully evaluated by AP to ensure all legislative requirements and AP operational standards have been met, including all required integrity assessments.⁹

12. ATCO subsequently asked the Commission to review and vary its decision to grant the CCA participation rights in this proceeding. Following a written process the Commission dismissed ATCO's review request in Decision 21369-D01-2016.¹⁰

13. The AUC and CCA posed information requests to ATCO. ATCO filed responses to these information requests. The parties then filed argument and reply argument in accordance with a schedule set by the Commission. The Commission considers the close of record for this proceeding to be September 12, 2016, the date upon which the CCA and ATCO each filed reply argument.

3 Discussion of issues

14. In argument, the CCA raised a number of issues related to potential rate impacts associated with the asset swap. The Commission finds that these submissions address issues that have already been decided by the Commission in decisions 2010-228, 2012-310 and 3577-D01-2016. In its ruling setting out the scope of the CCA's allowed participation in this proceeding, the Commission specifically set out the issues that it was granting the CCA participation rights to address and what issues it considered to be already decided. As noted above, the CCA was granted participation rights to address whether the "assets added have been fully evaluated by AP to ensure all legislative requirements and AP operational standards have been met, including all required integrity assessments."¹¹ However, the Commission also stated that "it would not be of assistance for the CCA to participate in these facility proceedings to provide input as to the potential rates implications."

15. Having regard to the foregoing, the Commission has not summarized the views of the CCA and ATCO on issues that have either been previously decided or are outside the scope of this proceeding, including the application of the no-harm test, cost allocation and NGTL rate design issues.

⁹ Exhibit 21379-X0245, paragraph 41.

¹⁰ Decision 21369-D01-2016: ATCO Gas and Pipelines Ltd. (South) – Request for Review of Ruling on Standing and Participation Rights in Proceedings 21369 and 21379, Proceeding 21369, Application 21369-A001, August 5, 2016.

¹¹ Exhibit 21379-X0245, AUC Ruling on CCA intervener status, -2016-06-01, paragraph 41.

3.1 The usefulness of transferred assets

Views of the CCA

16. The CCA submitted that the asset swap has not met or no longer meets the requirements of subsections 100(c) and (d) the *Public Utilities Act* which, amongst other things, prohibits the owner of a public utility from (c) providing or maintaining service that is unsafe, improper or inadequate and (d) subjecting a “particular person or corporation or locality or a particular description of traffic to any prejudice or disadvantage in any respect whatever.”¹²

17. The CCA stated that some of the transferred assets were over 60 years old. The CCA considered that there is no evidence in this application that confirms these assets continue to serve a purpose, or that operational expenses and future capital expenses meet ATCO’s integrity requirements.

18. The CCA also expressed concerns respecting ATCO’s review of the cathodic protection history of assets involved in the asset swap and questioned the projected annual land rights costs, lease payments, and taxation for the acquired assets versus the costs for the assets transferred to NGTL.

Views of ATCO

19. ATCO submitted that Section 100(c) of the *Public Utilities Act* relates to safe, proper and adequate service. ATCO argued that the Commission previously concluded that ATCO had met the requirements of the no harm test, specifically as it relates to concerns regarding service quality, reliability and increased costs to customers.

20. ATCO further submitted that Section 100(d) of the *Public Utilities Act* relates to discriminatory rate treatment. It pointed out that in Decision 2012-310, the Commission found that the asset swap would not have adverse rate impacts on customers. Further, ATCO considered that the Commission was clear that any rate-related impacts of the asset swap not previously addressed are to be addressed in future rate proceedings, not the present facility applications.

21. ATCO submitted that the licence transfer applications cannot be viewed in a vacuum. It stated that the asset swap is part of integration which was a major initiative in the Alberta gas transmission service sector prompted by a call from the Commission and customers for a solution to the issues arising from multiple gas transmission tolls and regulatory proceedings in Alberta. ATCO argued that the subject licence transfer applications are the tail-end of implementing integration and asserted that the substantive issues surrounding integration, including the costs and benefits for various customer groups, have been adjudicated in prior forums where all affected stakeholders had the opportunity to participate.

22. ATCO confirmed that a review of all of the assets that make up the asset transfer to ATCO was conducted to ensure that all pipelines are hydraulically necessary to meet contractual volumes and no facilities have become redundant as a result of asset swap.

¹² Exhibit 21379-X0245, AUC Ruling on CCA intervener status, 2016-06-01, paragraph 47.

23. ATCO confirmed that the pipelines and meter stations have been cathodically protected in accordance with the requirements of CSA-Z662 - Oil and Gas Pipeline Systems and that all assets are suitable for continued operation for the foreseeable future without capital upgrades.

Commission findings

24. The Commission accepts ATCO's confirmation that the pipelines and meter stations have been cathodically protected in accordance with the requirements of CSA-Z662 and are suitable for continued operation for the foreseeable future. In that respect, the Commission considers that the assets operated by both NGTL and ATCO have been subject to similar regulatory standards and oversight and are effectively interchangeable.

25. The Commission agrees with ATCO that any upgrade expenditures required over the remaining life of the assets will be dealt with in the same fashion as existing assets, regardless of whether they are part of the asset swap, and will require individual assessment. The Commission observes, in this regard, that forecast costs and business cases, where appropriate, will be presented through a general rate application (GRA) review process.

26. The Commission is also of the view that future costs on existing pipelines are not always predictable, particularly on older pipelines that currently cannot be inspected using in-line inspection tools. Since any future upgrades to the transferred assets are essentially upgrades to the Alberta System, these costs are passed on to the ratepayers through the Alberta System tolls. Therefore, the Commission finds that future ratepayer costs associated with upgrades to the transferred assets are expected to be administered in a similar fashion regardless of which company owns the transferred assets.

27. The Commission concurs with ATCO that any difference in land rights costs between the transferred assets should have a net-zero impact on ratepayers, as both sets of costs are recovered through Alberta System tolls.

4 Meter stations transferred from NGTL to ATCO

Views of the CCA

28. The CCA expressed concerns about the age of the meter stations to be transferred to ATCO and desired a greater level of confidence that the meter stations will not require significant capital upgrades that must be borne by the distribution ratepayers.

Views of ATCO

29. ATCO confirmed that the measurement equipment was reviewed as part of the due diligence process in 2011 for the asset swap, Proceeding 1723.¹³ As each station's supervisory control and data acquisition (SCADA) and measurement is transferred, devices are formally reviewed and the measurement integrity is validated. NGTL and ATCO both comply with Measurement Canada requirements. The asset swap agreement considers that assets transferred

¹³ Exhibit 0020.01.ATCOPIPE-1723, Proceeding 1723, AUC-AP-03(b) and AUC-AP-6 responses.

will be integrated into ATCO's process to evaluate capital expenditures over the remaining life of the asset through individual assessments.

30. ATCO stated that it complies with the requirements of Measurement Canada and the Alberta Energy Regulator's (AER's) Directive 17 – Measurement Requirements for Oil and Gas Operations with respect to measurement devices. The 2011 due diligence process assessed and confirmed that the transferred facilities met code requirements in place at the time. At the time of actual transfer in 2016, each site had undergone a site review. The NGTL assets are being incorporated into ATCO's integrity management programs and would be periodically reviewed for code compliance and overall operational performance.

31. ATCO stated that environmental assessments were completed as part of the due diligence process. The asset swap agreement addresses any potential liabilities related to environmental issues.

32. ATCO confirmed that 14 meter stations involved in the asset swap are equipped with H₂S shutdown equipment and that the H₂S analyzers meet legislative requirements. The analyzers are not the same as those currently used by ATCO. ATCO has undertaken training for its staff and procured spare parts. These assets are being incorporated into ATCO's integrity programs. Future capital expenditures over the remaining life of the assets would be dealt with through individual assessments. The acquired facilities that include H₂S shutdown systems do not have warning light systems consistent with ATCO's warning light program identified in its 2015-2016 GRA. Any upgrade expenditures required over the remaining life of the assets will be dealt with in the same fashion as existing assets, regardless of whether they are part of the asset swap, and will require individual assessment. Forecast costs and business cases, where appropriate, will be presented through a GRA process.

33. ATCO confirmed that the gas sampling equipment used for energy determination is consistent with its operating standards and meets all legislative requirements.

34. ATCO confirmed that existing isolation valves and all other isolating equipment in the meter stations meet all legislative requirements for isolation and that existing isolation valves and all other isolating equipment in the meter stations are in compliance with Alberta Occupational Health and Safety Rules Part 15.

Commission findings

35. The Commission has reviewed ATCO's evidence and finds that the steps it has taken to assess the condition of the meter stations being transferred from NGTL are reasonable in the circumstances. Those steps include the due diligence exercise conducted by ATCO in 2011, and its formal review of each facility upon transfer. The Commission is satisfied with ATCO's assurances that the measurement devices that will be transferred will comply with the requirements of Measurement Canada and those set out in the AER's Directive 17.

36. Likewise, the Commission finds that ATCO has taken reasonable steps to ensure that the 14 meter stations that include H₂S shutdown equipment comply with legislative requirements for such equipment. The Commission also finds that any upgrades to those meter stations to meet

ATCO's warning light program will be addressed in the same manner as existing assets, and, where circumstances demand, justified through a business case in a GRA process.

5 Safety and integrity of pipelines transferred from NGTL to ATCO

Views of the CCA

37. The CCA expressed concerns that ATCO has failed to provide a clear indication of how the urban pipelines transferred from NGTL are safe and adequate to meet the needs of its consumers given the vintage of some of the pipelines.

38. The CCA was also concerned that some of the transferred pipelines are in urban areas and are of a similar vintage to those identified for replacement in the urban pipeline replacement and in-line inspection (ILI) programs. As a result, there may be associated capital upgrade costs to these pipelines that would be borne by the ratepayers. The CCA contends that licences for transferred urban pipelines must not be accepted unless and until a third-party integrity assessment has been conducted and the assets are verified as adequate for use for the foreseeable future. Any required upgrades should be identified prior to approval of a permanent licence.

Views of ATCO

39. ATCO stated that integrity records were reviewed for pipeline systems that have had ILI inspections completed.¹⁴ ATCO confirmed that segments previously inspected by NGTL meet ATCO's technical standards for ILI inspectability.

40. ATCO also confirmed that not all pipeline segments acquired from NGTL are equipped to be inspected by ILI. It explained that pipeline segments that are not currently inspectable by ILI, would be incorporated into ATCO's pipeline integrity program and managed and prioritized according to operating parameters, diameter and location.

41. ATCO stated that it had completed a review of the critical components of NGTL assets included in the asset swap, including pipeline specification, records, engineering records, and construction and operational inspections. ATCO concluded that the assets were constructed, operated and licenced with the regulator in a manner that was consistent with sound engineering principles and construction practices of the time and in accordance with regulatory requirements.

42. ATCO stated that it would continue to operate the pipeline segments included in the asset swap under the current operating parameters. It explained that pipeline segments acquired through asset transfer would be incorporated into ATCO's pipeline integrity program and would be continually monitored for ongoing compliance with regulatory requirements and industry standards. It stated that the newly acquired pipeline segments would be managed consistent with ATCO's current ILI program which includes upgrading and inspecting all pipelines that have an outside diameter equal to or greater than 219.1 millimetres and a length greater than five km.

¹⁴ Pipeline systems previously inspected by ILI include: 16" Gilby Lateral, 24" Plains Mainline, 16" Sylvan Lake Lateral, 22" East Calgary Lateral, 8" Donalda Lateral and 16" Nevis Lateral.

43. ATCO confirmed that segments of five of the pipelines transferred from NGTL to ATCO are located within urban municipal boundaries.¹⁵ However, it stated that these pipelines are not located within the densely populated urban Calgary or Edmonton areas, where there is a transportation utility corridor alternative to allow a program such as the urban pipeline replacement to be pursued.

44. ATCO argued that third-party assessments of these urban pipeline segments are not necessary because these assets are currently under NEB jurisdiction and were under AUC jurisdiction prior to 2009. ATCO observed that these assets have therefore been subject to compliance with similar regulatory requirements, particularly CSA-Z662, over their lives to date.

Commission findings

45. The Commission finds that the steps proposed by ATCO to ensure the ongoing safe operation of the assets transferred to it from NGTL are reasonable in the circumstances. The Commission observes that the pipelines in question have, since their construction, been under the regulatory oversight of the NEB, the AUC, and the AUC's predecessors and have been subject to the requirements of CSA-Z662.

46. The Commission finds that the due diligence process conducted by ATCO to determine the condition of the transferred assets was comprehensive and included a review of pipeline specification, records, engineering records, and construction and operational inspections. In the Commission's view, these steps were reasonable and demonstrated that the assets were constructed and operated in accordance with sound engineering principles and construction practices of the time, and in accordance with regulatory requirements.

47. The Commission is satisfied that ATCO has a comprehensive integrity management program in place and that the newly transferred pipelines will be effectively integrated into that program which is risk-based and subject to ongoing monitoring.

48. The Commission recognizes that some of the transferred pipelines are not currently ILI compatible but finds that this is not a unique situation in Alberta and does not render the assets unsuitable for future use without third-party verification. The Commission accepts ATCO's submissions that the risks associated with operating these pipelines in their current locations can be managed through its integrity management program.

49. The Commission acknowledges that there may be future costs associated with the transferred pipelines due to ILI and possible upgrades. However, these costs could be passed on to the ratepayers regardless of whether ATCO or NGTL owns the pipelines since they are part of the Alberta System. Should such a circumstance arise, the CCA would have an opportunity to review and challenge the cost allocations to ratepayers in the appropriate proceeding. Since these transferred pipelines are part of the Alberta System, they are tied into a system which was serving the ratepayers prior to the transfer and is currently serving the ratepayers.

¹⁵ NPS 22 East Calgary Lateral –city of Calgary, NPS 6 Joffre Lateral –city of Red Deer, NPS 10 Joffre Sales Lateral –city of Red Deer, NPS 22 East Calgary Lateral – town of Cochrane and NPS 16 Sylvan Lake Lateral – Sylvan Lake.

6 SCADA and communications compatibility on meter stations and pipelines transferred from NGTL to ATCO

Views of the CCA

50. The CCA expressed concern that the asset swap may be incompatible and incur unforeseen capital costs that will ultimately be costs borne by distribution ratepayers.

Views of ATCO

51. ATCO confirmed that all of the meter stations and pipeline segments transferred from NGTL to ATCO were evaluated for SCADA and communications functionality and compatibility with ATCO's system and Gas Control Centre.

52. ATCO stated that the estimated forecast cost of SCADA and communications capital upgrades required to integrate the assets into ATCO's Gas Control System is \$2,675,000 and was acknowledged in Decision 3577-D01-2016 and considered to be necessary and negligible as they are a transfer of costs from NGTL to ATCO, and vice versa, due to the transfer of assets.

Commission findings

69. The Commission finds the cost of the SCADA and communications capital upgrades required to integrate the assets into ATCO's Gas Control System to be necessary and are offset by the benefits achieved through the asset swap and integration.

7 Decision

70. Having regard to the evidence filed the Commission finds that ATCO has demonstrated that it took reasonable steps to evaluate the compliance of the Tranche 2a assets with regulatory and legislative requirements and ATCO's own operational standards. The Commission further finds that the transferred assets can be effectively integrated into ATCO's integrity management system and operated safely. The Commission has previously found the asset transfers associated with integration between NGTL and ATCO to be in the public interest. Based on the foregoing, the Commission considers the licence transfers to be in the public interest in accordance with Section 17 of the *Alberta Utilities Commission Act*.

71. Pursuant to Section 11 of the *Pipeline Act* and Section 4.1 of the *Gas Utilities Act*, the Commission approves the transfer of pipelines from NGTL to ATCO in Tranche 2a and grants new licences to be issued pending pipeline database updates.

Dated on November 2, 2016.

Alberta Utilities Commission

(original signed by)

Willie Grieve, QC
Chair

(original signed by)

Neil Jamieson
Commission Member

Schedule A

Pertaining to Alberta Energy Regulator (AER)/NEB Licence 80088:

- line 2, 0.05 kilometres (km) of 48.3-millimetre (mm) outside diameter (OD) pipe (unknown tap)
- lines 12 and 14, 19.17 km of 168.3-mm OD pipe (Joffre Lateral)
- line 16, 0.31 km of 168.3-mm OD pipe (Penhold M/S Producer Tie-In)
- line 21, 29.9 km of 610-mm OD pipe (East M/L -Sylvan Lake Section)
- line 24, 0.19 km of 48.3-mm OD pipe (Sales Tap #4238 for Gull Lake Gas Co-op)
- line 25, 0.19 km of 48.3-mm OD pipe (Sales Tap #4238 for Anchorage Pipeline (Abon & S. Jahrous))
- line 26, 0.08 km of 48.3-mm OD pipe (Sales Tap #4029 for Crossroads Gas Co-op)
- lines 28, 29, 30 and 31, 114.99 km of 610-mm OD pipe (Plains Mainline)
- “From Location” LSD amendment of lines 2, 16, 24 and 25
- modification of base map for line 14
- modification of base map for line 21

Pertaining to AER/NEB Licence 80093:

- lines 1 and 3, 22.1 km of 168.3-mm OD pipe (Joffre Lateral)
- modification of base map for line 3

Pertaining to AER/NEB Licence 80095:

- line 1, 14.39 km of 406.4-mm OD pipe (Eckville Town Tap Relocation)
- line 2, 0.48 km of 48.3-mm OD pipe (Gilby Lateral)
- modification of base map for line 2
- modification of pipe grade of line 2

Pertaining to AER/NEB Licence 80097:

- line 1, 8.55 km of 168.3-mm OD pipe (Three Hills Creek Lateral)
- line 2, 0.19 km of 114.3-mm OD pipe (Wimborne North Lateral)
- modification of “From Location” LSD of line 1
- modification of “From Location” facility code of line 1
- length amendment of line 1

Pertaining to AER/NEB Licence 80135:

- line 1, 10.69 km of 323.9-mm OD pipe (Wimborne Lateral)
- line 2, 0.05 km of 26.7-mm OD pipe
- line 3, 0.40 km of 48.3-mm OD pipe (CWNG Tap P-304 Supply Line Relocation)
- modification of “From Location” LSD of line 2
- modification of base map for line 2

Pertaining to AER/NEB Licence 80137:

- line 4, 11.9 km of 323.9-mm OD pipe
- line 9, 0.95 km of 323.9-mm OD pipe
- line 10, 0.84 km of 168.3-mm OD pipe (Sylvan Lake North M/S Producer Tie-In)
- line 11, 0.05 km of 88.9-mm OD pipe (Sylvan Lake East M/S Producer Tie-In)
- line 12, 3.2 km of 219.1-mm OD pipe (Sylvan Lake South Lateral)
- line 13, 0.05 km of 88.9-mm OD pipe (Cygnet Lake M/S Producer Tie-In)
- line 15, 0.87 km of 114.3-mm OD pipe (Benalto West Lateral)
- line 18, 0.47 km of 219.1-mm OD pipe (Sylvan Lake East M/S Producer Tie-In)
- line 19, 3.3 km of 273.1-mm OD pipe (Sylvan Lake South Lateral Loop)
- line 20, 30.5 km of 457-mm OD pipe (Sylvan Lake Lateral Loop)
- line 21, 16.49 km of 406.4-mm OD pipe (Sylvan Lake Lateral)
- modification of base map for lines 13 and 18
- modification of “To Location” LSD of line 20

Pertaining to AER/NEB Licence 80148:

- line 1, 0.32 km of 168.3-mm OD pipe (Penhold North Sales Lateral)

Pertaining to AER/NEB Licence 80176:

- lines 1, 3, 4 and 5, 12.81 km of 114.3-mm OD pipe (Medicine River Lateral)

Pertaining to AER/NEB Licence 80194:

- line 1, 16.9 km of 610-mm OD pipe (East M/L Loop)
- line 3, 0.05 km of 26.7-mm OD pipe (Crossroads Gas Co-Op Tap #4026)
- line 5, 0.05 km of 26.7-mm OD pipe (Three Hills Creek M/S - Sales Gas Line)
- modification of pipe type and grade of line 1
- modification of base map for line 3

Pertaining to AER/NEB Licence 80214:

- line 18, 2.07 km of 219.1-mm OD pipe (Ferrybank Lateral)
- modification of “From Location” LSD of line 18
- modification of base map for line 18

Pertaining to AER/NEB Licence 80351:

- line 1, 0.03 km of 114.3-mm OD pipe (Joffre Lateral)

Pertaining to AER/NEB Licence 80406:

- line 1, 0.06 km of 60.3-mm OD pipe (Wimborne Sales Lateral - M/S Decommissioned)
- modification of base map for line 1

Pertaining to AER/NEB Licence 80437:

- line 2, 2.07 km of 219.1-mm OD pipe (Ferrybank Lateral Loop Line Split)
- modification of base map for line 2

Pertaining to AER/NEB Licence 80532:

- line 1, 27.3 km of 273.1-mm OD pipe (Joffre Sales Lateral)
- line 2, 0.16 km of 219.1-mm OD pipe (Joffre Sales #2 M/S Lateral)
- modification of base map for line 1
- modification of pipe outside diameter, type, grade and stress level of line 2

Pertaining to AER/NEB Licence 80580:

- line 1, 1.76 km of 168.3-mm OD pipe (Briggs Lateral)

Pertaining to AER/NEB Licence 80623:

- line 2, 0.23 km of 323.9-mm OD pipe (Springdale Lateral)
- line 3, 32.5 km of 323.9-mm OD pipe (Mulhurst Lateral)
- line 4, 1.05 km of 323.9-mm OD pipe (Bonnie Glen M/S Producer Tie-In)
- line 5, 7.4 km of 323.9-mm OD pipe (Bonnie Glen Lateral)

Pertaining to AER/NEB Licence 80685:

- line 22, 25.41 km of 610-mm OD pipe (Eastern Alberta System M/L Loop - Penhold Section)
- line 23, 10.26 km of 610-mm OD pipe (Plains M/L Lateral Loop - Three Hills Section)