
From: Macdonald, Leah <leahmacdonald@hydro.mb.ca>
Sent: Thursday, January 23, 2025 1:39 PM
To: Rules of Practice and Procedure Regulations
Subject: RE: Extension of Submission Deadline for Phase I – Rules of Practice and Procedure Review / Report de la date limite de dépôt pour la phase I – Révision des Règles de pratique et de procédure

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Hello,

On behalf of the Centra Gas Manitoba Inc. team, I would like to put forward our feedback related to the modernize practices and procedures – electronic filing and service area of the Rules of Practice and Procedure to align with the CER Act.

We are supportive of going paperless, meaning no paper submissions and not requiring ink on paper signatures.

Other feedback is as follows:

Electronic document submission - e-filing

1. When submitting documents to the CER Inbox via the Electronic document submission online tool, some suggestions are as follows:
 - In Step 2 of 8: Project information
 - If the related hearing is not currently active in front of the regulator the project name is not available in the drop down and “Not Listed” must be selected, then the “Hearing order number” and “File number” entry fields disappear. There are times when a process has a hearing order number and has deadlines for submissions after the decision and orders have been filed; in these circumstances it would be helpful to have the ability to manually enter the project name, hearing order, file number etc. in order to maintain connection to the process the submission is a part of. An example is Hearing Order RH-003-2023; In this hearing the CER’s Reasons for Decision included Order TH-002-2024 requiring a compliance filing and providing a comment period, both occurring after the hearing in front of the CER was completed. At the time of filing letters in reply to the compliance filing the project RH-003-2023 is no longer included in the drop down list of projects.
 - When “Not Listed” is selected one must manually fill in the “Company name” field; it would be helpful to include the clarification that this is the company who filed the project, not the name of the one completing this electronic document submission.

Electronic document submission

[Help](#)

Project information

1 2 3 4 5 6 7 8

Step 2 of 8

*Project name:

Company name:

Hearing order number:

File number:

When Project name if "Not Listed" allow for manual entry of the Hearing order number and/or File number if applicable (does not need to be required to proceed),

Electronic document submission

[Help](#)

Project information

1 2 3 4 5 6 7 8

Step 2 of 8

*Project name:

*Company name:

When Project name is "Not Listed", include an informative blue box (like the ones in step 3) to clarify that the Company name field is for the company who filed the project application, not the company who is currently filing a submission.

- Step 3 of 8: Submission information
 - **More standardization** for the title would make reviewing the inbox and searching for documents more efficient.
 - Currently, the electronic submission system asks the filing party to fill out a tile and provides *Submission Title Examples* for reference. From my analysis the “document name” (in REGDOCS) or “Title of Filing” (in Inbox) format seems to be: [filing confirmation number (C####)] - [Submitting party] - [possibly the title field from step 3]
 - An improvement could be to add some of the other general cells in a standardized order so that all titles are in the same format.
 - This could look like; **[Order No./Project Name] [Document Type]** [Submitting party] [Free field for description – as per the *Submission Title Examples* – and specify not to include the other fields as they will be automatically populated]. E.g.: “RH-003-2023 – Letter of Comment – Centra Gas MB Ltd. – Response to Compliance Order TG-002-2024” rather than each party including something different in their “title” and having duplications or omissions when the filing is formatted.

Electronic document submission [Help](#)

Submission information

1 2 3 4 5 6 7 8

Step 3 of 8

The title you enter here will appear in the name of your filing on the CER's website; we may modify it.

*Title:

[View examples of titles.](#)

Enter the name of the person or organization the submission should be attributed to. If this is your filing, enter your name or organization. If you are submitting this on behalf of someone else, enter their name or organization.

*Filer:

*Role:

Rather than a free Title field...

Consider:

- Step 5 of 8: Electronic Documents
 - If possible; **request that electronic filings are submit in one PDF document** rather than having separate PDFs for the cover letter, letter, application, report, appendices, etc..
 - When each filing has multiple different PDFs that need to be referenced it can lead to information being missed, getting lost or being difficult to find.
 - Sometimes submissions are combined in one PDF and other times they are not, this increases the chance of portions being missed.

For example; in a past process a party filed a submission and a cover letter a two different PDF documents. The submission was reviewed but there was a new request and deadline included in the cover letter that was missed because it was in a separate document.

2. In July of 2023 The CER used a form to accept Letters of Comment on File Number: **OF-Tolls-Group1-N081-2023-03 01**, Project Name: NOVA Gas Transmission Ltd. (NGTL) Firm Transportation-Linked Export (FT-LE) Service Application.
- From our recollection parties were asked to fill out a form and were told they could either provide their response in the comment field of the form, or chose to attach a document.
 - Filling out the form resulted in the submitting individual's name being populated into the Document Name rather than the company/organization name.
 - Providing the option to either put a response in the form field or submit a letter resulted in parties filing differently, making assessment of the responses difficult.
 - The filings can be seen here: <https://apps.cer-rec.gc.ca/REGDOCS/Item/View/4370110> on the date July 6, 2023.


As mentioned and shown in the examples below, the form led to inconsistent entries and made assessment and the ability to find documents difficult. Having recently submitted a letter of comment, our understanding is the above form was a variance in the typical e-filing CER process and we support the cessation of the above form submission.



Canada Energy
Regulator

Régie de l'énergie
du Canada

Letter of Comment([C25386](#))

	<p>Submitting individual's name appeared as the document name, not the Company they are filing on behalf.</p>
Group: Centra Gas Manitoba Inc.	
Letter of Comment Filing Date: 2023-07-06	

Hearing Information

Project Name: NOVA Gas Transmission Ltd. (NGTL) Firm Transportation-Linked Export (FT-LE) Service Application
Company: NOVA Gas Transmission Ltd.
File Number: OF-Tolls-Group1-N081-2023-03 01

Comments

Please see attached supplemental comments.

C25386 [REDACTED] - Letter Of Comment

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Some parties had duplicated filed info, including response in the form's comment field and attaching a letter, others did one or the other. Consistent, standardized submissions are

Submitter name is normally the Company, not the individual's.

Item(s) - 1 to 2 out of about 2

Expand Collapse

Name	Date	Submitter
C25386-1 [REDACTED] - Letter Of Comment - A8R4Q3 ☆	2023-07-06	[REDACTED]
C25386-2 [REDACTED] - 2023 07 06 Centra Supplemental Comments RE NGTL Application for FT-LE Service - A8R4Q4 ☆	2023-07-06	[REDACTED]

C24756 Centra Gas Manitoba Inc. - Letter of Comment regarding NGTL's Application for FT-LE Service

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Start New Search



Advanced Search



Add To Favourites

Earlier request for LOC in this same process (File OF-Tolls-Group1-N081-2023-03 01) did not use a form, submissions displayed company names as the Submitter correctly and only the letter document was posted. (Preferred)

Item(s) - 1 to 2 out of all

Sort By

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Name	Date	Submitter
C24756-1 2023-06-07 Centra LOC re NGTLs Application for FT-LE Service - A8Q6Y1 ☆	2023-06-07	Centra Gas Manitoba Inc.
Receipt - Accusé de réception - A8Q6Y2 ☆	2023-06-07	Centra Gas Manitoba Inc.

Thank you for the opportunity to submit feedback. Please let us know if you require any further clarification on the information provided.

Leah Macdonald

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From: Rules of Practice and Procedure Regulations

Sent: Friday, December 6, 2024 3:47 PM

To: Rules of Practice and Procedure Regulations

Subject: Extension of Submission Deadline for Phase I – Rules of Practice and Procedure Review / Report de la date limite de dépôt pour la phase I – Révision des Règles de pratique et de procédure

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La version française suit

Hello,

The Commission of the Canada Energy Regulator (CER) is extending the feedback period related to the review of the [National Energy Board Rules of Practice and Procedure, 1995](#) (Rules). After hearing from interested parties, we are extending the comment submission deadline to **31 January 2025**. If you have already submitted your written submission and wish to use this time to make changes, please feel free to resubmit your written response prior to **31 January 2025**.

Please note, this will not impact funding, and no change is required for grant recipients.

The project webpage, which includes the [Discussion Paper](#), can be found on [CER Dialogue](#).

If you have any questions, please contact the Rules project team at rppr@cer-rec.gc.ca.

We thank you for your continued interest in participating in this initiative and look forward to receiving your submissions.

Rumu Sen

Regulatory Policy

(403) 390-6177

RPPR@cer-rec.gc.ca



Canada Energy
Regulator

Régie de l'énergie
du Canada

Bonjour,

La Commission de la Régie de l'énergie du Canada prolonge la période de commentaires pour la révision des [Règles de pratique et de procédure de l'Office national de l'énergie \(1995\)](#) (« Règles »). À la demande des parties intéressées, nous reportons ainsi la date limite pour le dépôt des commentaires au **31 janvier 2025**. Si vous avez déjà soumis vos observations écrites et souhaitez profiter de l'occasion pour apporter des changements, n'hésitez pas à les soumettre de nouveau avant le **31 janvier 2025**.

Veuillez noter que ce report n'aura aucune incidence sur le financement et qu'aucun changement n'est requis pour les bénéficiaires de subventions.

La page Web du projet, qui comprend les [documents de fond](#), se trouve dans [Dialogue Régie](#).

Des questions? Veuillez communiquer avec l'équipe du projet de révision des *Règles* à rppr@cer-rec.gc.ca.

Nous vous remercions de l'intérêt soutenu que vous portez à cette initiative et sommes impatients de recevoir vos commentaires.

Rumu Sen

Politique de réglementation

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Canada Energy
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