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NOPRC 2013-01 NEB *Damage Prevention Regulations*

Sheri Young  
Secretary of the Board  
National Energy Board  
444 - 7th Avenue S.W.  
Calgary, AB T2P 0X8

**Re: Notice of Proposed Regulatory Change (NOPRC) 2013-01 – National Energy Board Damage Prevention Regulations**

Dear Ms. Young

Westcoast Energy Inc., carrying on business as Spectra Energy Transmission ("Westcoast"), respectfully submits this letter to the Board in response to the request for comments regarding the NOPRC 2013-01.

Westcoast has engaged in discussions with Canadian Energy Pipeline Association ("CEPA") member companies with regard to the above, and supports the response submitted by CEPA on their behalf. In addition, Westcoast provides the following comments.

Westcoast supports legislation establishing mandatory one-call membership for every owner or operator of underground infrastructure, as well as mandatory one-call requirements for any party causing a ground disturbance. The Board's proposed revisions to the Pipeline Crossing Regulations – requiring anyone planning construction or excavation within the area prescribed in the *National Energy Board Act* to make a locate request via a one-call centre, and requiring NEB-regulated pipeline companies to be members of one-call centres where they exist – set a positive example for damage prevention initiatives. Westcoast encourages the Board to take a leadership role in the promotion of mandatory one-call use and membership to regulators and law-makers across Canada.

Westcoast requests that the Board provide clarification regarding the proposed Damage Prevention Program components, in particular regarding the requirement to have "a process to manage the movement of vehicles and mobile equipment across the pipeline." As written, this statement does not provide any details as to what this process is expected to include, therefore it is difficult to provide meaningful comment on this requirement.

Thank you for the opportunity to provide comments. Westcoast requests that the Board take into consideration the feedback provided by CEPA and in this letter. Westcoast is committed to working in collaboration with the Board in the development of positive regulatory change for damage prevention.

Yours truly,

A handwritten signature in blue ink, appearing to read "Gary Metz", is written over the printed name. The signature is stylized and cursive.

Gary Metz