

Many Islands Pipe Lines (Canada) Limited

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VIA EMAIL: pipeline.financialresources@neb-one.gc.ca

National Energy Board
517 Tenth Avenue SW
Calgary, AB T2R 0A8

Attention: Sherri Young, Secretary of the Board

Re: Draft Pipeline Financial Requirements Guidelines, and Implementation of Financial Resource Requirements

Many Islands Pipe Lines (Canada) Limited (MIPL(C)L) is a wholly owned subsidiary of SaskEnergy Incorporated (SaskEnergy), a Saskatchewan Crown Corporation. Pursuant to Section 21 of *The SaskEnergy Act*, SaskEnergy may exercise its powers and fulfill its purposes through subsidiaries. Pursuant to Section 6 of the Act, SaskEnergy is an agent of the Provincial Crown, and all property of SaskEnergy and its wholly owned subsidiaries are deemed property of the Crown.

MIPL(C)L transports natural gas, and SaskEnergy has the natural gas distribution franchise in the Province of Saskatchewan.

Further to your request for comments, MIPL(C)L is committed to maintaining the financial resources necessary under the *National Energy Board Act*. The purpose of the Pipeline Financial Requirements Guidelines (Guidelines) is to provide further details on how a pipeline company should demonstrate that it meets the financial resource requirements established in the NEB Act and the Regulations. Each company's information will be assessed on a case-by-case basis.

In providing Guidelines we would encourage the National Energy Board to consider whether full compliance plan filings and scrutiny of how financial resources are to be maintained (e.g. what type of financial resource, and what amount of each type) is necessary in the particular context. MIPL(C)L notes that exemptions have been granted for Crown owned corporations, in particular

the abandonment funding requirements (Reasons for decision **MH-001-2013**.) The reasoning in that context was that:

“Minell and Many Islands are wholly-owned subsidiaries of crown corporations of the Provinces of Manitoba and Saskatchewan, respectively. Vermilion River is owned by the County of Vermilion River. Each of these entities is publicly owned such that the risk that funds will not be available to safely and effectively abandon their pipelines is low.”

It is respectfully submitted that the same logic would apply in context of and unintended or uncontrolled release of natural gas.

MIPL(C)L would like to thank the National Energy Board (NEB) for the opportunity to provide input regarding the Draft Pipeline Financial Requirements Guidelines draft Guidelines.

Yours truly,

MANY ISLANDS PIPE LINES (CANADA) LIMITED



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cc: Darren Janke
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