

September 10, 2020

Filed Electronically

Canada Energy Regulator  
Suite 210, 517 Tenth Avenue SW  
Calgary, Alberta T2R 0A8

**Attention: Mr. Jean-Denis Charlebois, Secretary of the Commission**

Dear Mr. Charlebois:

**Re: The Explorers and Producers Association of Canada (EPAC)  
Application to Extend the Nova Gas Transmission Ltd. (NGTL) Gas Transportation  
Temporary Service Protocol (TSP) Tariff Provision Decision RH-002-2019 (Application)  
Comments of Powerex Corp.**

In accordance with the Canada Energy Regulator's ("CER" or "Commission") process letter dated August 24, 2020, Powerex Corp. ("Powerex") submits the below comments on the application filed on July 28, 2020 by the Explorers and Producers Association of Canada ("EPAC") to extend the NGTL Temporary Service Protocol ("TSP") Tariff Provision ("Application") that was approved in Decision RH-002-2019.

Powerex is a natural gas marketer and holds firm capacity on the NGTL system and natural gas storage capacity connected to NGTL. Powerex utilizes both firm and interruptible transportation services on the NGTL system.

**Position of Powerex**

Powerex opposes the Application. Powerex did not actively oppose the implementation of the TSP in the RH-002-2019 proceeding. However, the TSP was understood to be a *temporary* solution effective for the tail end of Summer 2019 and all of Summer 2020 (April through October) to help manage System constraints during planned outage/maintenance periods at and upstream of the Clearwater and Woodenhouse Compressor Stations (TSP-Applicable Constraint). The TSP provision is set to expire on October 31, 2020 and does not reference the in-service date of any facilities. As noted by the Commission in RH-002-2019, its decision does not establish precedent for curtailments after October 31, 2020.<sup>1</sup>

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<sup>1</sup> Application for Approval of Amendments to the NGTL Gas Transportation Tariff – Temporary Service Protocol, RH-002-2019 Reasons for Decision, Page 8, Filing ID: C02965-1.



Powerex has a concern with the extension of the TSP. By prioritizing Interruptible Transportation-Delivery service (IT-D) over firm transportation services, the TSP goes against the principle of service priority within NGTL's Tariff.

Further, Powerex is aware that NGTL and its stakeholders have followed the Commission's guidance from the RH-002-2019 Decision and have continued consultations to explore alternative long-term solutions to further enhance access to storage. NGTL established an Access to Storage Task Force as part of the TTFP (Tolls, Tariff, Facilities and Procedures Committee) in February 2018, and in January 2020, NGTL established the Executive Advisory Committee (EAC) with the intent to hold strategic conversations amongst executives on key issues affecting the Western Canada Sedimentary Basin and the NGTL System. These groups have worked collaboratively to establish alternatives to the TSP to enhance access to storage while respecting the priority of services on the NGTL System.

For the above reasons, Powerex is of the opinion that the CER should deny EPAC's application.

If the Commission has questions concerning this filing, please contact the undersigned at (604) 891-6034 or by email at [clarke.lind@powerex.com](mailto:clarke.lind@powerex.com)

Yours truly,

**Powerex corp.**

Clarke Lind  
Senior Market Policy Analyst