

October 10, 2025

Attention:

**Re: ATCO Gas
 Existing Distribution Pipeline Compliance Application
 Notification of Section 214 Application Filing**

ATCO Gas, an operating division of ATCO Gas & Pipelines Ltd., intends to apply to the Canada Energy Regulator (CER) under Section 214 of the *Canadian Energy Regulator Act (CER Act)* to operate and maintain eleven (11) existing low-pressure gas pipelines that distribute natural gas across the Alberta-Saskatchewan border within the municipality of Lloydminster (the Application).

In accordance with the CER Early Engagement Guide, ATCO Gas has prepared the following Information Package for the purpose of communicating Application information to potentially affected persons and communities.

Timing of CER Filing

The Section 214 Application is expected to be filed on October 27, 2025.

Application Overview

The City of Lloydminster, which straddles the Alberta-Saskatchewan border, has been provided with natural gas distribution service since the 1930s. ATCO Gas has operated in Lloydminster since it purchased the assets serving Lloydminster in 1985. Currently, ATCO Gas delivers natural gas to over 11,500 Lloydminster homes and businesses primarily for space heating, domestic hot water and cooking.

Pipelines that cross provincial borders fall under the jurisdiction of the CER pursuant to the CER Act. As a result, the transfer of regulatory jurisdiction to the CER is required for the 11 cross-border pipelines (a total of 0.564 km of pipeline), which is the basis for the Application. There is no new pipeline construction or right-of-way required as part of the

Application. The existing pipelines are located within the road right-of-way of Highway 17 between 67 Street and 12 Street (Township 494 Road).

The pipelines vary in size between two to eight inches (60 mm to 219 mm) in diameter, are made of steel or plastic, and vary in installation date from the beginning of gas service in Lloydminster in the 1930s to 2017. The pipelines were designed in accordance with CSA Z662 – Oil and Gas Pipeline Systems (or the previously applicable code CSA Z184 – Gas Pipeline Systems) and continue to be operated and maintained in accordance with CSA Z662, Clause 12 – Gas Distribution Systems.

When compared to high-pressure transmission pipelines carrying substantial quantities of natural gas over long distances, ATCO Gas transports relatively small volumes over shorter distances to end-use customers using smaller, lower-pressure pipelines in Lloydminster. Whereas transmission pipelines typically operate at pressures between 5,000 to 14,000 kPa,¹ the highest maximum operating pressure of ATCO Gas's cross-border distribution pipelines is 550 kPa, and customers typically receive service at a standard delivery pressure of 1.72 kPa.

Pursuant to *The City of Lloydminster Act* and *Lloydminster Charter*² enacted by each of the Governments of Alberta and Saskatchewan, ATCO Gas's utility rates and costs are regulated by the Alberta Utilities Commission, Alberta's economic utility pipeline regulator, and its' construction and operation are regulated by the Rural Utilities Division of the Government of Alberta, Alberta's technical utility pipeline regulator, on both the Alberta and Saskatchewan sides of Lloydminster.

ATCO Gas's Application will request exemptions available under the CER Act with the intent of applying consistent regulations to all ATCO Gas distribution pipelines. As will be set out in the Application, exemptions are appropriate because the cross-border pipelines will continue to be safely and cost effectively operated under the economic and technical regulatory regime currently in place, which will also continue to apply to similar ATCO

¹ Canada Energy Regulator, *Natural Gas Pipeline Transportation System*. Accessed July 4, 2025 at <https://www.cer-rec.gc.ca/en/data-analysis/facilities-we-regulate/canadas-pipeline-system/2021/natural-gas-pipeline-transportation-system.html>

² For Alberta legislation refer to <https://www.alberta.ca/alberta-kings-printer>. For Saskatchewan legislation refer to <https://publications.saskatchewan.ca/#/agencies/47>

Gas pipelines elsewhere under provincial jurisdiction. Since ATCO Gas is a regulated utility and its costs are recovered from its customers, the exemptions would mitigate the cost of meeting duplicative provincial and CER regulatory requirements that will be borne by ATCO Gas customers. The exemptions will also mitigate the potential for other negative impacts to customers such as project delays.

Pipeline Locations

The existing eleven (11) cross-border pipelines are located within the road right-of-way of Saskatchewan Highway 17, which is also referred to as 50 Avenue in Lloydminster. The pipeline locations are provided in Table 1 and in the attached figures.

Table 1: Summary of Pipeline Locations

Crossing No.	Location Reference	Approx. Coordinates	Pipeline Length (km)
1	67 Street	53.3070, -110.0054	0.119
2	57 Street	53.2926, -110.0055	0.048
3	55 Street	53.2889, -110.0055	0.036
4	53 Street	53.2858, -110.0055	0.014
5	52 Street	53.2854, -110.0055	0.053
6	51 Street	53.2843, -110.0055	0.027
7	46 Street	53.2798, -110.0055	0.070
8	44 Street	53.2775, -110.0055	0.025
9	29 Street	53.2635, -110.0055	0.070
10	18 Street	53.2537, -110.0055	0.059
11	12 Street	53.2492, -110.0053	0.043
Total			0.564

Refer to attached Figures 1-1 to 1-3 for the location of the 11 pipelines.

Pipeline Components and Activities

There are no anticipated changes to the design or operation of the existing pipelines. These pipelines will continue to be operated and maintained in accordance with CSA Z662, Clause 12 – Gas Distribution Systems. Only the 11 pipelines at the border crossing are subject to this Application. There will be no disruption to your current natural gas supply services as a result of this Application.

Potential Environmental and Socio-economic Effects

Stantec Consulting Ltd., on behalf of ATCO Gas, is conducting a desktop Environmental and Socio-economic Assessment (ESA) in order to meet the requirements of the CER Filing Manual. This will include an assessment of potential interactions the Application may have with biophysical and socio-economic Filing Manual elements. As there is no construction required for these 11 existing pipelines and the only change is the transfer of regulatory jurisdiction to the CER, little or no effects are anticipated as a result of this Application. The existing pipeline segments are located on previously disturbed lands within the road right-of-way of Highway 17. Interactions with current use of lands and resources for traditional purposes, human health, and heritage resources are not anticipated due to this Application.

Conditions and Commitments

Following the filing of the Application with the CER, information including status of conditions and commitments will be updated and posted on the CER website as required.

Safety

ATCO Gas will continue to protect the safety of its customers, employees and the public. This is done in many ways such as adding a rotten egg odour to natural gas, regular leak inspections, and safe digging programs.

More safety information is available at <http://www.gas.atco.com/en-ca/safety.html>, including:

- What to do when you smell gas;
- Tips on digging safely and the [Click Before You Dig](https://www.clickbeforeyoudig.com/) program;³
- Tips to prevent and detect carbon monoxide in your home (available in 13 languages);
- Information on ATCO's line survey program; and
- How to check for uncapped gas lines.

³ <https://www.clickbeforeyoudig.com/>

A Natural Gas 101 brochure has been enclosed to provide additional information on natural gas and natural gas safety.

Emergency Response

ATCO Gas has an Emergency Response Plan in place to respond safely and efficiently in the unlikely event of an incident. ATCO Gas includes emergency responders in its Management System Programs through regular meetings and participation in emergency response exercises.

In an emergency, call ATCO Gas's emergency line 24 hours a day, seven days a week at 1-800-511-3447.

Participation in the Engagement Process

ATCO Gas is providing this Information Package to communicate to potentially affected persons and communities about the Application and associated process. Feedback collected will be used to support Application planning. Public engagement is also an important component of the ESA. Input received will be used to support the existing environmental conditions and to develop site specific mitigation measures for the Application.

The Application will be available for viewing on the CER's website once it has been filed. ATCO Gas will advise all potentially affected persons and communities when the Application is filed.

ATCO Gas can be contacted with questions and/or comments about the Application by phoning 310-5678 (Alberta) or 1-888-511-7550 (outside Alberta) or emailing naturalgas@atco.com. General inquiries can also be sent to ATCO Gas through the General Inquiry form available at <https://gas.atco.com/en-ca/about/contact.html>. All questions and comments received regarding this Application will receive a response from ATCO Gas.

Questions or concerns can also be provided directly to the CER at:

Canada Energy Regulator
Suite 210, 517 Tenth Avenue SW

Calgary, AB T2R 0A8

<https://www.cer-rec.gc.ca/en/about/contact/index.html>

Toll free: 1-800-899-1265

Toll free fax: 1-877-288-8803

Email: info@cer-rec.gc.ca

Dispute Resolution

ATCO Gas believes that disputes are best resolved through direct communication. However, if we are unable to fully address your concerns, other parties are available to help. The CER provides an Alternative Dispute Resolution (ADR) program that potentially affected persons and communities can access to resolve issues related to this Application. Information for this ADR program can be found on the CER website at <https://www.cer-rec.gc.ca/en/consultation-engagement/alternative-dispute-resolution/index.html>

CER Brochures and Publications

The following information regarding the CER and its regulations are being provided and can be found on the CER's website:

- The CER, Energy Projects, and You
- CER – Pipeline Damage Prevention Regulations – What you need to know

Sincerely,



Cole Nychka, P.Eng., MBA
Manager, Regulatory
ATCO Gas and Pipelines Ltd.

Att. Aerial Overview - Figures 1-1, 1-2 and 1-3