

Leave to Open (LTO)

Exemption Request

LTO EXEMPTION REQUEST – TEE ASSEMBLY AND TIE-IN CONNECTIONS

Construction of the Project will require replacing the existing NPS 12 customer tie-in piping connection at the Richmond Sales Meter Station (customer tie-in) using a NPS 12 by NPS 20 tee assembly with NPS 12 and NPS 20 valves and replacing the existing NPS 36 Stittsville compressor station piping (compressor station tie-in) with a NPS 36 by NPS 20 tee assembly with a NPS 20 valve.

A plot plan illustrating the location of the tee installations is included as Attachment 03.

TransCanada seeks exemption from the requirement to obtain LTO from the Board prior to placing the pipeline back into service following the installation of the tee assemblies and tie-ins. The exemption would minimize an outage while maintaining service during construction of the new facility.

Safety Considerations and Rationale for Exemption Request

The customer tie-in and compressor station tie-in tee assemblies are prefabricated. All prefabricated assemblies and connecting piping will be shop tested with the testing witnessed by a TransCanada representative before installation. The NPS 20 valves on the customer tie-in and compressor station tie-in that will connect to the new meter station will not open for transmission until LTO is granted for the balance of the Project.

There are two pressurized field welds for each tee installation. These welds cannot be pressure tested in the field as they are final tie-in welds, but the integrity of these welds will be verified in accordance with industry accepted methods and standards.

Field weld inspection will involve both a visual inspection and non-destructive examination (NDE) that includes one or more of radiographic, ultrasonic, magnetic particle, or liquid penetration examination, depending on the size and type of weld, in accordance with TransCanada's specifications. Inspectors are required to monitor the welding on site, verify that safe practices are implemented, and record welding parameters as part of their inspection to ensure that welding is conducted in conformance with the qualified welding procedure(s).

TransCanada has processes and safeguards in place to ensure safe construction, such as applicable inspections and testing. A short length of pipe would be pressurized following installation of the customer tie-in and compressor station tie-in tee assemblies. Prior to resuming service on the compressor station piping and meter station piping, TransCanada will apply its internal LTO process which is consistent with the requirements set out in Guide T of the Filing Manual. TransCanada is of the view that an exemption from the LTO requirement for the customer tie-in and compressor station tie-in tee assemblies would not compromise the safety of employees, the public or the environment.

TransCanada proposes to file the shop test information for the tee assemblies as part of the LTO application for the entire Project.

Relief Sought

Pursuant to section 58(1) of the NEB Act, TransCanada seeks a partial exemption from the requirements of section 30(1)(b) and 47(1) of the NEB Act for exemption from the requirement to obtain LTO from the Board prior to placing the pipeline back into service following the installation of the tee assemblies and tie-ins. TransCanada proposes to file a LTO application for the balance of the Project with the Board after construction is completed.