BC Pipeline and Field Services

RPO Roles and Responsibilities

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1.1 RGT Receipt Point Operators

1.1.1 Overview

Enbridge's commitment to service reliability is dependent upon Enbridge obtaining information pertaining to the receipt of gas at each Receipt Point (RP). Enbridge and the shippers must also have accurate and timely information regarding shippers' use of the system. In order to achieve these goals, Enbridge and the shippers have agreed to implement several tools:

- Installation of Electronic Flow Measurement (EFM) equipment at the RP as identified in the Measurement Policy section of the Shipper's Handbook.
- Concept of a Receipt Point Operator (RPO)

The purpose of this document is to focus on the role and responsibilities of the RPO and to examine the relationship of the RPO with the shippers and with SET-West. The primary role and responsibilities of the RPO are to:

- Act as an agent for all shippers upstream of the RP.
- Provide RP analysis as outlined in the RGT Receipt Point Sampling Frequency Specification document (MES-010)
- Allocate raw gas production at the RP to each shipper on a daily basis for the Intraday Allocation and on a month end basis for the Actual Plant Allocation.

1.1.2 Role and Responsibilities of All RPOs

1.1.2.1 Appointing a Receipt Point Operator

Each RP delivering gas to Enbridge has an RPO identified to Enbridge by the RP owner.

The owner of the RP is by default the RPO. However, the RP owner may designate a third party as RPO. At any one time, there is only ***one*** RPO for each RP. However, the RP owner reserves the right to replace the RPO if desired.

Enbridge recognizes an RPO change at least 5 business days prior to the end of the month to be effective for the first of the following month. This notice must be received in writing by Enbridge Production Facilitation and signed by both the current RPO and the new RPO acknowledging the change in operator and acceptance of the RPO's Roles and Responsibilities. It is the RPO's responsibility to notify all firm shippers at the RP of any changes to the RPO.

1.1.2.2 Receipt Point Operator as Shipper Agent

Enbridge recognizes the RPO as an agent for all shippers who nominate and/or deliver gas at that RP. Actions of the agent are deemed to be the actions of the shipper.

Enbridge is entitled to rely on information provided by the RPO as if it was information provided by the shipper.

- Instructions given to the RPO by Enbridge are considered as instructions given to the shipper.
- Lack of compliance by the RPO in regards to the Enbridge instructions, as mentioned in the point above, are considered to be a lack of compliance by the shipper(s).
- Charges related to the actions of the RPO are applied to the shipper or shippers for whom the RPO acts.

- The RPO is responsible for contacting Enbridge BC Pipeline and Field Services, Gas Scheduling department to obtain a Customer Interface agreement, and maintaining access to Customer Interface for their company.

1.1.2.3 Non-performance of RPO

The following describes how the issues related to non-performance are managed:

1. Enbridge reserves the right to restrict throughput or shut-in an RP for the following reasons:
    a) Quality of gas (failure of raw gas to conform to the raw gas spec at a RGT RP); and
    b) Over-pressuring by the RPO (MAOP – Maximum Allowable Operating Pressure) of the RGT system at the RGT RP.
2. Enbridge reserves the right to restrict throughput at an RP for unreliable EFM due to:
    a) Refusal to install the required EFM equipment;
    b) Refusal to maintain EFM equipment; and
    c) Not updating compositional information in the flow computer for Gas and/or Liquid sites.
3. Enbridge's response to the reasons in 1 and 2 above will be completed in a reasonable fashion and time frame consistent with the nature of the offence based on the Measurement Canada's Acts and Regulations. As outlined in Article 5 of the GT&C.

Note: The above-noted rules apply to both Dry Gas RPs and RGT RPs.

1.1.3 Role and Responsibilities of an RGT RPO

1.1.3.1 Production Source Priority Schedule

The purpose of the PS Priority Schedule is to ensure that the results of an allocation run are correctly allocated to the correct parties i.e. shipper, marketer and producer.

1. The PS Priority Schedule is predetermined and provided prior to a Gas Day.
2. The RP Operator is responsible for submitting PS Priority Schedule for each production source behind the RP to Enbridge.
3. The RPO and the shippers are responsible for correcting any misallocations that occur as a result of the PS Priority Schedule. Enbridge will not recognize allocation errors resulting from erroneous submissions of the PS Priority Sell Schedule.

1.1.3.2 Reporting Daily Production

Intra-Day Allocation Table

RP Allocation Type	Reporting Responsibility	Reporting Frequency	RP Allocation Definition (EFM)	RP Allocation Definition (non-EFM or Offline EFM)
Predicted Allocation	RPO	By 11:30 am CCT of gas day & anytime during the gas day	The RP's EFM predicted 24 hour flow volume is allocated to each reported PS volume.	The sum of the RPO's reported volume for each PS is assumed to be the RP's predicted 24 hour flow volume.
Estimated Allocation	RPO	Deadline is 4 hours after end of	The RP's EFM actual 24 hour flow volume is allocated to each	The sum of the RPO's reported volume for each PS is assumed to be the

RP Allocation Type	Reporting Responsibility	Reporting Frequency	RP Allocation Definition (EFM)	RP Allocation Definition (non-EFM or Offline EFM)
		gas day	reported PS volume.	RP's actual 24 hour flow volume.
Final Estimated Allocation	RPO	Deadline is 15:00 CCT after end of gas day	Same process as Estimated	Same process as Estimated
Actual Allocation (Month-end)	RPO	As per posted schedule	Same process as Estimated	The RP's allocated are allocated by the RPO and reported back to Enbridge via CI.

Note: If no PS estimates are reported for the day, a default data set will be used for the RP Allocation. For non-EFM sites, the sum of the RP Allocation is assumed to be the RP Volume.

1.1.3.3 Reporting Frequency

The following process describes Reporting Frequency:

1. The RPO reports production for each Production Source to Enbridge and the PS Priority Sell Schedule. This data is then used by Enbridge to split the PS volume to each shipper.

Note: For EFM sites, the reported volume for each Production Source will be adjusted such that the sum of the PS production will match the EFM volume prior to the Intra-Day allocation of the PS volume to the shippers.

2. The RPO is responsible for submitting all EFM and non-EFM (or Offline EFM) allocation data as per the Intra-Day Allocation Table. If the RPO does not submit a production volume for a PS for the Optional allocations, then the last reported production volume for that PS will be used.
3. At the start of the gas day (09:00 CCT) and anytime during the gas day, the RPO may submit a Predicted Allocation. Four hours after the end of the gas day (13:00 CCT), the RPO may also submit an Estimated Allocation for the gas day.
4. After the deadline for the Estimated Allocation (13:00 CCT), the RPO ensures the production estimates are correct. If an error or omission is discovered in the Estimated Allocation, the RPO submits a Final Estimated Allocation. The Final Estimated Allocation is due at 15:00 CCT on the day after the end of the gas day (09:00 CCT).
5. Enbridge does not act on any RPO errors or omissions following the expiration of the final estimated allocation period except where the RPO has:
    a) Identified that error or omission within the RPO Reporting period: and
    b) Has submitted the Final Estimated Allocation within the RPO Reporting period.
6. Following expiration of the RPO Reporting correction period, all data will be deemed to be confirmed.

1.1.3.4 EFM Reported Production

The EFM Reported Production process allocates the EFM volume at the RP back to each Production Source.

1. The predicted 24-hour flow volume is a calculation based on the actual EFM measured throughput and a predicted volume for the remainder of the day. This predicted 24-hour flow volume is calculated by the Enbridge SCADA/GMAS system and is an estimate only.

Note: Each shipper is ultimately responsible for Gathering and Processing fees, regardless of any discrepancies between the predicted 24-hour flow volume and actual results.

2. The actual 24-hour flow volume is a calculation based on the EFM readings at the end of the gas day.
3. The sum of the PS volumes should equal the EFM volume and if not, Enbridge will prorate the EFM volume to each PS based on the allocation supplied by the RPO.
4. Enbridge uses the Actual Allocation volumes to calculate the Gathering and Processing fees.

1.1.3.5 Non-EFM (or Offline EFM) Reported Production

The Non EFM Reported Production process represents the monthly RPO reported volume for each production source at non-EFM or Offline EFM sites.

1. The predicted 24-hour flow volume, the estimated 24-hour flow volume and the final estimated 24-hour flow volume of a non-EFM or Offline EFM RP is the sum of the corresponding allocation provided by the RPO.
2. The RPO is responsible for entering into Customer Interface the actual 24-hour flow volume of the RP at non-EFM or Offline EFM sites by 9:00 CCT on the date of the following month as posted on CI under "Measurement and Allocations Deadlines".
3. The sum of the production source volumes should equal the actual 24-hour flow volume and if not, Enbridge will prorate the actual 24-hour flow volume to each PS based on the actual allocation supplied by the RPO.
4. Enbridge uses the actual allocation volumes to calculate the Gathering and Processing charges.
5. Enbridge provides monthly PS Conversion Factors based on the most up-to-date information available to Enbridge. The Conversion factors enable Enbridge, Shippers and RPOs to convert between raw and residue volume.
6. The Conversion Factors enable Enbridge, Shippers and RPOs to convert raw production to an estimated residue volume. The Conversion Factors are available to the RPO through Customer Interface.
7. The Conversion Factors are available to view through Customer Interface by the 25th of the month which are effective for the first of the following month. (On the 26th Conversion Factors will be available to the RPO on Customer Interface for the next month).
8. Enbridge provides a heating value (MJ Factor) for each production source. The heating value enables a shipper to convert estimated residue volume to a GJ equivalent.
9. Further to the Intra-Day Shipper Allocation Schedule as outlined in the Shipper Handbook (Residue Gas and Product Allocations), Enbridge calculates an estimated GJ residue production allocation for each shipper at an Enbridge plant. For each Enbridge plant, the estimated GJ production allocation is based on:
    a. PS Splits;
    b. EFM measured volume;
    c. PS Priority Schedule;
    d. Conversion Factors; and

e. PS MJ Factor.

10. The estimated GJ production allocation is applied to the Shipper's estimate account for that gas day in which the gas physically flowed. This amount is then used in the calculation of the Shipper's estimated daily account imbalance.
11. For all Enbridge BC Pipeline and Field Service's Plants, the actual month-end allocations are calculated according to the Plant Allocation section of the Shipper Handbook (Residue Gas and Product Allocations).

1.1.3.6 Raw Gas Transmission Gas Gathering Constraints

The RGT Constraint commercial business model replaces the previous nomination based RGT constraint processes removed with the elimination of the Field Service nominations.

RGT constraints are declared when there is insufficient raw gas gathering capacity to provide for the full firm RGT contracted volumes at the affected RP locations. RGT Constraints are not declared when full shut-in is required at an RP as directed in the posted Weekly Outage Schedule.

- RGT constraints are based on shipper firm RGT contracted service and the shipper's flow capability at the RP.
- RGT constraints may be by RP, laterals or by aggregated groups of RPs.
- The constraint algorithm maximizes shipper firm and raw capacity available.
- A Critical Notice is published to declare a constraint and Shippers and RPOs receive - authorized quantities by Email Alerts.

Receipt Point Operators (RPO):

- RPO's are responsible for managing physical flows to the total authorized constraint volumes at the RP.
- RPO subscribes to the RGT Constraint Email Alert to receive the shipper's authorized volumes at each of the RPOs affected RPs.
- RGT constraint compliance is based on the physical flows. Failure to comply with the reduced authorized volume may result in RP shut-in.

1.1.3.7 Input of Gas Analysis into the Electronic Flow Measurement (EFM) Device

The RPO is responsible to input an updated co-mingled gas analysis to the EFM device to reflect any changes in the gas stream. The RPO is responsible to ensure the accuracy of the analysis, not Enbridge. Detail on EFM analysis updating is provided in the Enbridge Shipper Handbook in the Raw Gas Transmission (RGT) Measurement Policy document. Analysis must be updated if the specific gravity of the RP gas stream changes by more than 4 percent. If a change is suspected and not reflected in the EFM device, a new sample will be requested by Enbridge's Measurement department.

The EFM information for RGT RPs is made available to shippers and RGT RPOs via Customer Interface. This information is updated as per the Intra-day Shipper Allocation Schedule as outlined in the Shipper Handbook (Residue Gas and Product Allocations).

1.1.3.8 Liquid Metering Failure

If the liquid flow data is unavailable for justifiable reasons, Enbridge estimates the flow using industry standard practices.

If accurate liquid flow data is unavailable for an extended period of time due to inadequate quality or maintenance of measurement equipment, the RP will be assigned a liquid flow of zero.

1.1.3.9 Audit Capability

The following process describes Audit Capability:

1. Enbridge reserves the right to audit the "actual allocations" at an RP to ensure that generally accepted measurement principles for reporting production are followed. This audit right applies to both EFM and non-EFM sites.
2. An audit can only be conducted on the last 13 months of data.
3. Enbridge must act on the results of an audit within 60 days from the completion of the audit. Enbridge rectifies the errors and posts Correction Cycle results on the Customer Interface web page.
4. The RPO reserves the right to review the audit results within 60 days from the completion of the audit.
5. Residue gas and product allocations are not to be adjusted unless the variance between the original reported volume and the audited volume is greater than 2 per cent. Enbridge completes an impact analysis to determine what level of adjustments is required because of the measurement error. The level of adjustments can be as follows:
    a) Rerun the Plant Allocation;
    b) Rerun the RP to PS Allocation; and
    c) Adjust individual Shipper accounts at the Determination of Production level.

Note: Once the level of adjustment is determined, Enbridge applies the residue gas adjustment to each shipper's estimate account and assesses any additional charges and any applicable refunds.

Note: Once a residue gas adjustment is applied to a shipper's account, the shipper is responsible for correcting any imbalance caused as a result of the adjustment.

7. If an RPO fails to cooperate in the audit procedure and does not supply the required information for a particular production source, Enbridge reserves the right to set the production source availability for that production source to zero.

Note: Enbridge will provide 30 days written notice to the RPO of Enbridge's requirement of the audit information.