

April 23, 2018

Jim Ellis
President and CEO
Alberta Energy Regulator
Suite 1000, 250 – 5th Street SW
Calgary, Alberta T2P 0R4

Issue: Proposed methane emissions regulations could negatively impact businesses

Dear Mr. Ellis:

On behalf of the community chambers who represent over 25,000 Albertan employers in the province, the Alberta Chambers of Commerce (ACC) is writing to express our concerns on recently released draft regulations regarding methane emissions. Changes to Directives 60 and 17 will have significant impacts on Alberta's natural gas industry. Our recommendations for developing these regulations to ensure they balance the protection of jobs with the need to reduce emissions are attached for your consideration.

Feedback from industry and businesses throughout our network indicate an escalating scope of impacts of the draft regulations. The full impact of these regulations has yet to be understood.

Given the significant associated costs to comply, the regulations as proposed could undermine our ability to attract investment, compete globally, and maintain activity. Most importantly, the cumulative effects pose a risk of significant job losses in communities where the oil and natural gas industries play a central role in the local economy.

We encourage you to consider the recommendations in our attached policy resolution as guiding principles for an extended consultation period. The current deadline of May 28 provides too little time for adequate consultations on such significant changes. By extending the timeframe for consultation, we can develop a regulatory framework which optimizes outcomes for Albertans, businesses and our environment by achieving a balanced and measured approach to regulating methane emissions.

Sincerely,



Ken Kobly
President and CEO

CC: Minister of Energy, Margaret McCuaig-Boyd
Minister of Environment and Parks, Shannon Phillips

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