



COX TAYLOR
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Reply: C. Edward Hanman*
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File: V-438-1

November 26, 2020

VIA EMAIL: lars.olthafer@blakes.com

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595 Burrard Street, Suite 2600,
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Attention: Lars Olthafer

VIA EMAIL: secretary@cer-rec.gc.ca

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

Attention: Jean-Denis Charlebois

Dear Sir:

Re: 1071948 B.C. Ltd. – Reply to the Letter of November 23, 2020

I write in response to the letter of objection of November 23, 2020 of Trans Mountain seeking to have the reply submission struck out or not made part of the record.

That letter was made necessary as a direct result of two things;

1. First the fundamental mischaracterization and misstatement of the basis of the objection as relating to “issues of compensation”.
2. The failure or refusal inherent in the response letter to accept the obligations under the statute of the authority Trans Mountain to provide an advance payment in accordance with the Statute.

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Trans Mountain's position is nothing more than we can do whatever we want, offer whatever we want, make an advance payment of whatever we want and that is not the law.

It comes as a surprise to me that this authority would seek to avoid its statutory responsibility hence the reply. If permission is required for this further filing and requires an application, then please accept this as a request for that reply position to be accepted and dealt with as part of the preliminary objection. It neither expands on the initial objection nor adds additional evidence, it merely states the law.

All of which is respectfully submitted.

Yours very truly,

COX, TAYLOR

Per:

A handwritten signature in black ink, appearing to read 'C. Hanman', with a long horizontal line extending to the right.

C. EDWARD HANMAN*

*Law Corporation

CEH/cb