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June 22, 2023

Via Email

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

Attention: Ramona Sladic, Secretary of the Commission

**Re: File OF-Tolls-Group1-T260-2023-03 01
Suncor Energy Marketing Inc. (“Suncor”) Application for Interim Commencement Date Tolls
and Other Related Matters related to the Transportation of Petroleum on the Expanded Trans
Mountain Pipeline System (the “Project”) (C24695) (the “Application”)
Comments of Suncor**

Further to the Commission’s Process Letter No. 1 of June 8, 2023, Suncor hereby advises of its intention to participate as an intervenor and provides the following comments on the Application.

Suncor has a direct and significant interest in the Application in that Suncor holds a Transportation Services Agreement and Facility Support Agreement (the “Agreements”) with Trans Mountain in relation to the Project.

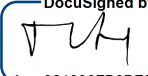
Suncor has reviewed the Application and is disappointed in the significant increases in the level of estimated Uncapped Costs that form the basis for Commencement Date tolls filed for by Trans Mountain. Among other potential remedies, Suncor looks forward to exercising its rights of audit pursuant to the Agreements.

Suncor further submits that the retention of 100% of the proceeds from demurrage fee collection by Trans Mountain is not appropriate. Suncor would also seek to clarify the application of the filed for tolls with respect to the in-service date and submits that the collection of expanded system tolls should not occur on volumes which were injected prior to the capacity of the expanded system coming into service.

Suncor reserves its right to participate in any process established by the Commission and any issues which may arise in any subsequent hearing established by the Commission.

Yours truly,

SUNCOR ENERGY MARKETING INC.

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John Van Heyst
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