

**VIA ELECTRONIC SUBMISSION**

December 6, 2024

Canada Energy Regulator  
Suite 210, 517 Tenth Avenue S.W.  
Calgary, Alberta T2R 0A8  
To: [REDACTED] Secretary of the Commission

Dear Ms. [REDACTED]

**Re: Public Comment Period on Proposed Updates to Guide R of the Canada Energy Regulator's (CER) *Filing Manual*: Transfer of Ownership, Lease or Amalgamation (*Canadian Energy Regulator Act* s. 181)**

Trans Mountain has reviewed the CER's proposed changes to *Filing Manual* Guide R and the Change in Ownership Application form and provides the following comments.

Trans Mountain generally supports the proposed changes and observes that they largely serve to modernize the requirements of Guide R to reflect more recent regulatory developments (i.e., Financial Resource Requirements) and to align information needs in a manner that is consistent with other guides in the *Filing Manual*.

Trans Mountain observes a wide variety of asset transfers that have been undertaken in recent years, either under s.181 of the *Canadian Energy Regulator Act* or under s.74 of the *National Energy Board Act*, ranging in pipeline assets spanning from several hundreds of kilometres to a few kilometers in length. For this reason, it is important for the application requirements to be scalable across a range of projects. In some cases, information needs such as value of the asset (original cost, accumulated depreciation and net book value), may be immaterial for a small asset, and in the case of an asset that has been in service for decades, may be fully depreciated with a net book value close to zero. As such, information needs in relation to smaller assets may be immaterial in the CER's determination as to whether the application ought to be approved. Trans Mountain believes that the CER expectation for certain information requirements should be commensurate with the size of the asset that is the subject of the application.

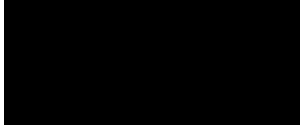
The information requested in the application section of the Change in Ownership form may need to be revised to align with the changes described in the Circumstances of Application section of the proposed updates to Guide R. These revisions would ensure that the required level of detail and documentation is appropriately tailored to the specific type of transaction.

Currently, the Change in Ownership Application form is not incorporated into the *Filing Manual* Guide R. The form is located through navigating the CER website or through an internet search. Trans Mountain would recommend, for ease of access, that the Change in Ownership Application form be linked to Guide R, possibly in lieu of the *Filing Manual* checklist. This change would make it easier for a proponent to locate. Trans Mountain appreciates the opportunity to provide feedback on the proposed *Filing Manual* Guide R and the Change in Ownership Application form.

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Should you have any questions or wish to discuss this matter further, please contact the undersigned at [regulatory@transmountain.com](mailto:regulatory@transmountain.com) or (403) 514-6400.

Yours truly,



Regulatory Affairs Specialist  
Trans Mountain Canada Inc.