

**VIA ELECTRONIC SUBMISSION**

April 30, 2021

Canada Energy Regulator  
Suite 210, 517-10<sup>th</sup> Avenue SW  
Calgary, AB T2R 0A8

**Attention: Mr. Jean-Denis Charlebois, Secretary of the Commission**

Dear Mr. Charlebois:

**Re: Trans Mountain Pipeline ULC (“Trans Mountain”)  
Financial Resources Plan – 2020 Annual Compliance Report  
Compliance to Order AO-001-FRO-002-2017  
CER File: OF-Gen-06 FRR**

On March 20, 2019, the National Energy Board, predecessor to the Canada Energy Regulator (“CER”), issued Order AO-001-FRO-002-2017 (the “Amended Order”) ([A98410](#)) to Trans Mountain. The Amended Order approved and provided direction to Trans Mountain with respect to its Financial Resources Plan. Condition 6 of the Amended Order requires Trans Mountain to file its annual compliance report in the format requested in the CER’s *Pipeline Financial Requirements Guidelines*.

On February 22, 2021, pursuant to section 60 of the *Canadian Energy Regulator Act* (“CER Act”), Trans Mountain sought an order to permit it to file, in confidence, the names of its insurers in its certificate of insurance for all future filings of its certificate of insurance under Condition 6 of the Amended Order ([C11610](#)).

On April 29, 2021, the Commission of the CER (“Commission”) granted relief as requested ([C12675](#)). Trans Mountain encloses its annual compliance report for 2020 (Attachment 1) and a redacted version of its certificate of insurance (Attachment 2). Trans Mountain is delivering an unredacted certificate of insurance to the Secretary of the Commission via hand delivery.

Should you have any questions, please contact the undersigned at (403) 514-6455 or [wanjing\\_hu@transmountain.com](mailto:wanjing_hu@transmountain.com).

Sincerely,

Wanjing Hu  
Senior Regulatory Analyst  
Trans Mountain Canada Inc.

Enclosures

## Attachment 1

Table 1: Financial Resources Plan for the year ended December 31, 2020

<b>Authorization Holder name:</b>	<b>Trans Mountain Pipeline ULC as general partner of Trans Mountain Pipeline L.P.</b>			
<b>Capacity/Risk Value:</b>	<b>300,000 barrels per day</b>			
<b>Absolute Liability Limit:</b>	<b>\$1 billion</b>			
\$000's CAD (as at most recent year-end Audited Financial Statements)	<b>Trans Mountain Corporation</b>	<b>Trans Mountain Pipeline L.P.</b>	<b>Total</b>	<b>Timing of Access (business days)</b>
Cash	-	\$14,310	\$14,310	1 day
Line of Credit (undrawn portion)	-	\$500,000	\$500,000	1-5 days
Commercial Paper (undrawn portion of program)	-	-	-	
Other Short-Term Resources (explain)	-	-	-	
<b>Total short-term, accessible within five (5) business days</b>		<b>\$514,310</b>	<b>\$514,310</b>	
Insurance <sup>[1]</sup>	-	\$519,466	\$519,466	Claim dependent
Surety Bonds	-	-	-	
Parent/Affiliate Guarantees (from Parent Co. to Authorization Holder)		-	-	
Other Financial Resources (explain)	-	-	-	
<b>Total Other</b>	-	<b>\$519,466</b>	<b>\$519,466</b>	

Note [1]: General/Excess Liability Insurance      US\$408,000  
 Dec 31, 2020, Bank of Canada Noon Rate      1.2732<sup>1</sup>  
 General/Excess Liability Insurance      CA\$519,466

<sup>1</sup> Bank of Canada, Daily Noon Exchange Rates: Daily exchange rate lookup, December 31, 2020, U.S. dollar: [www.bankofcanada.ca/rates/exchange/daily-exchange-rates-lookup/](http://www.bankofcanada.ca/rates/exchange/daily-exchange-rates-lookup/). Should the exchange rate temporarily decrease below 1.2255CAD to 1.0000USD, the resulting insurance amount will be lower than the CAD500 million minimum level approved in the Amended Order. In this case, Trans Mountain will temporarily backstop this shortfall with cash on hand. Should this shortfall be sustained, Trans Mountain will assess alternatives to backstop the difference.

Attachment to Trans Mountain Pipeline  
Financial Resources Plan  
2020 Annual Compliance Report

**Attachment 2**

**Redacted Certificate of Insurance**

This is to certify that the Policy(ies) of insurance listed below ("Policy" or "Policies") have been issued to the Named Insured identified below for the policy period(s) indicated. This certificate is issued as a matter of information only and confers no rights upon the Certificate Holder named below other than those provided by the Policy(ies).

Notwithstanding any requirement, term, or condition of any contract or any other document with respect to which this certificate may be issued or may pertain, the insurance afforded by the Policy(ies) is subject to all the terms, conditions, and exclusions of such Policy(ies). This certificate does not amend, extend, or alter the coverage afforded by the Policy(ies). Limits shown are intended to address contractual obligations of the Named Insured.

Limits may have been reduced since Policy effective date(s) as a result of a claim or claims.

**Certificate Holder:**

Canada Energy Regulator  
Suite 210, 517 - 10th Avenue SW  
Calgary, AB T2R 0A8

**Named Insured and Address:**

Trans Mountain Canada Inc.  
Suite 2700  
300 - 5th Avenue S.W.  
Calgary, AB T2P 5J2

**This certificate is issued regarding:**

Trans Mountain Corporation Financial Resource Requirement Plan pursuant to Canada Energy Regulator Order FRO-002-2017

Type(s) of Insurance	Insurer(s)	Policy Number(s)	Effective/ Expiry Dates	Sums Insured Or Limits of Liability	
COMMERCIAL GENERAL LIABILITY		43-XIF-150352-01	Aug 31, 2020 to Aug 31, 2021	Each Occurrence	USD 3,000,000
				Aggregate	USD 3,000,000
EXCESS LIABILITY		BM2015969	Aug 31, 2020 to Aug 31, 2021	Each Occurrence	USD 5,000,000
				Aggregate	USD 5,000,000
				Products & Completed Operations Aggregate	USD 5,000,000
				Self Insured Retention	USD 5,000,000
1ST EXCESS LIABILITY • Excess of the above policies.		BM2015837	Aug 31, 2020 to Aug 31, 2021	Each Occurrence	USD 25,000,000
				Products & Completed Operations Aggregate	USD 25,000,000
				Aggregate	USD 25,000,000
2ND EXCESS LIABILITY • Excess of the above policies.			Aug 31, 2020 to Aug 31, 2021	Per Occurrence	USD 35,000,000
				Aggregate	USD 35,000,000
3RD EXCESS LIABILITY • Excess of the above policies.		BM2015926	Aug 31, 2020 to Aug 31, 2021	Each Occurrence	USD 15,000,000
				Products & Completed Operations Aggregate	USD 15,000,000
4TH EXCESS LIABILITY • Excess of the above policies.		BM2015927 / BM2015932 / BM2015946 / BM2015970	Aug 31, 2020 to Aug 31, 2021	Each Occurrence	USD 50,000,000
				Products & Completed Operations Aggregate	USD 50,000,000
				Aggregate	USD 50,000,000
5TH EXCESS LIABILITY • Excess of the above policies.		BM2015931	Aug 31, 2020 to Aug 31, 2021	Each Occurrence	USD 25,000,000
				Aggregate	USD 25,000,000
6TH EXCESS LIABILITY • Excess of the above policies.		BM2015942 / BM2015943 / BM2015944 / BM2015961	Aug 31, 2020 to Aug 31, 2021	Each Occurrence	USD 150,000,000
				Aggregate	USD 150,000,000
7TH EXCESS LIABILITY • Excess of the above policies.		BM2015975 / BM2015977 / BM2015940 / 1000011839201	Aug 31, 2020 to Aug 31, 2021	Each Occurrence	USD 50,000,000
				Aggregate	USD 50,000,000
8TH EXCESS LIABILITY • Excess of the above policies.		BM2015975/ BM2015977/ BM2015940/ ENGAO2000512/ 1000011839201	Aug 31, 2020 to Aug 31, 2021	Each Occurrence	USD 50,000,000
				Aggregate	USD 50,000,000

No.: 2020-111-REV-1

Dated: April 29, 2021

This document supersedes any certificate previously issued under this number

**Notice of cancellation:**

The insurer(s) affording coverage under the policies described herein will not notify the certificate holder named herein of the cancellation of such coverage.

**Marsh Canada Limited**

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Livingston Place, Suite 1100  
Calgary, AB T2P 0B4  
Telephone: (403)-6302316  
Fax: -  
Calgarycertrequest@marsh.com

Marsh Canada Limited

By: 

Ronald Schmid