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**RECEIVED / REÇU**

Date: February 15, 2023  
CT- 2021-002

Annie Ruhlmann for / pour  
REGISTRAR / REGISTRAIRE

OTTAWA, ONT.

Doc. # 341

**VIA EMAIL**

February 15, 2023

Registry  
Competition Tribunal  
Thomas D'Arcy McGee Building  
90 Sparks Street, 5<sup>th</sup> Floor  
Ottawa, ON K1A 0H9

**Re: CT-2021-002 – Commissioner of Competition v. Secure Energy Services Inc.**

This is in response to the reply cost submissions of Secure dated February 14, 2023.

The Reply submission from Secure does not impact the Commissioner's arguments in his cost submissions filed February 10, 2023. Paragraph 7 of the Commissioner's cost submissions mistakenly used the 10 year undiscounted efficiencies claimed in response to the 104 application. Secure overstated their efficiencies claim by \$[REDACTED] million (or 17%) from the 104 application to the 92 application. In other words, a proper "apples to apples" comparison of Secure's estimate of efficiencies lost resulting from a full block of the transaction was \$[REDACTED] million discounted over 10 years in response to the 104 application and then reduced in the 92 application to \$[REDACTED] million discounted over 10 years if the Tribunal ordered a full block of the transaction.

Regards,

**Jonathan Hood**  
Senior Counsel  
Department of Justice  
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