

Update on the Enmax Case: A “Reasonable” Outcome?

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It may not have been the collision of two worlds, but there is at least a fender bender to deal with. In *Enmax Energy Corporation v. Alberta*, the Alberta Court of Appeal ("ACA") recently reversed the decision of the trial court that had allowed two subsidiaries of Enmax Corporation ("ENMAX") to deduct interest paid on three inter-company loans at rates of 11.5 per cent, 10.3 per cent, and 9.9 per cent.¹ Although both the trial court and the ACA spent a lot of time on the principles of interest deductibility related case law and legislation, the ACA went to great pains to describe its decision as being driven by regulatory as opposed to tax considerations.

>> [Read the full post here](#)

By

[Stephen Fyfe](#)

Expertise

[Tax](#), [Energy - Oil & Gas](#), [Energy – Power](#)

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BLG Offices

Calgary

Centennial Place, East Tower
520 3rd Avenue S.W.
Calgary, AB, Canada
T2P 0R3

T 403.232.9500
F 403.266.1395

Ottawa

World Exchange Plaza
100 Queen Street
Ottawa, ON, Canada
K1P 1J9

T 613.237.5160
F 613.230.8842

Vancouver

1200 Waterfront Centre
200 Burrard Street
Vancouver, BC, Canada
V7X 1T2

T 604.687.5744
F 604.687.1415

Montréal

1000 De La Gauchetière Street West
Suite 900
Montréal, QC, Canada
H3B 5H4

T 514.954.2555
F 514.879.9015

Toronto

Bay Adelaide Centre, East Tower
22 Adelaide Street West
Toronto, ON, Canada
M5H 4E3

T 416.367.6000
F 416.367.6749

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