



B #:	2143-15
Date:	December 18, 2015
To:	All Participants
Category:	Dividends
From:	International Services
Attention:	Operations, Reorg & Dividend Managers, Partners & Cashiers
Subject:	<u>Tax Relief Country: Canada</u> Brookfield Renewable Energy Partners L.P. CUSIP: G16258108 <u>Record Date: 11/30/2015 Payable Date: 12/31/2015</u> <u>CA Web Instruction Cutoff Date: 12/23/2015 8:00 PM (EST)</u>

Brookfield Renewable Partners L.P. (“Brookfield”) has declared a distribution of **USD \$0.4150** to unit holders of record at the close of business on November 30th, 2015. This distribution is broken down into multiple classifications for Canadian tax withholding purposes as follows. Please see attachment provided by Brookfield for additional information:

- **\$0.0513 - Non-Arm’s Length Interest** - Subject to Canadian withholding tax. Please view below for TaxRelief requirements. (25% | 0%)
CA ID: 96362520
- **\$0.0181- Remaining Amount of the Distribution** – Remaining amount of the distribution. Please review the important notice for more information.
CA ID: 96362619
- **\$0.2867 - Canadian Source Dividend** - subject to Canadian withholding tax processed under the normal Foreign Tax Withholding function. (25% | 15% | 0%)
CA ID: 95550082
- **\$0.0589 - Return of Capital** – Canadian Sourced. Not subject to Canadian withholding tax.
CA ID: 96362525

Participants can use DTC’s TaxReliefSM service over Corporate Actions Web (“CA Web”) to electronically certify all or a portion of their position entitled to the applicable withholding tax rate. Participants are urged to consult TaxInfoSM respectively before electronically certifying their instructions over CA Web.

Non-Arm's Length

Only the following beneficial owners are eligible for the exempt 0% rate on the **non-arm's length interest**:

1. U.S. Residents as defined in Canadian TaxInfo
2. Eligible Canadian Residents as defined in Canadian TaxInfo

Participants making an instruction at the exempt rate for holders whom meet these requirements will be prompted to enter a Tax Exempt Control number which, for non-arm's length interest distributions only, should be entered as 999999.

All other holders should elect at the unfavorable rate of 25%.

By electing the Exempt 0% tax rate the Participant of DTC agrees to the Legal Conditions for the Use of DTC TaxReliefSM section of Canadian TaxInfo.

U.S. Residents – Please refer to Canadian TaxInfo for a complete definition

For Canadian tax purposes, treaty benefits are only available to residents of the U.S. as defined in the Canada – U.S. Treaty. In general, a U.S. resident includes any person who, under U.S. domestic tax law, is subject to income tax in the United States by reason of domicile, residence, place of management, place of incorporation or any other similar criteria. Canada – U.S. Treaty benefits are available to an estate or trust, only to the extent that the income derived by such estate or trust is subject to income tax in the United States either in its own right or that of its beneficiaries. In some circumstances, a U.S. resident may not be entitled to claim treaty benefits by virtue of the application of the Limitation on Benefits (LOB) article in the Canada – U.S. Treaty. Refer to Limitation on Benefits for more information.

"Eligible Canadian Residents" are defined as follows for DTC purposes:

- a) Beneficial owners of securities maintained in the DTC account of a "registered Canadian Participant" where a "registered Canadian Participant" is (a) a DTC Participant or (b) a downstream financial intermediary holding securities in the account of a DTC Participant; which has directed the required Memorandum of Understanding to Canada Revenue Agency and has received a valid CRA identification number from the CRA, without regard to the residence of the beneficial owners of those securities.
- b) Registered Canadian pension plans that have valid CRA identification numbers issued by the Canada Revenue Agency.
- c) Canadian registered charities that are listed on the CRA website and for whom the charity status on that site indicates "registered" can use "CRC001". This listing should be checked prior to every dividend payment. <http://www.cra-arc.gc.ca/chrts-gvng/lstngs/menu-eng.html>

THE DIVIDEND POSITION AND ALLOCATION HISTORY OPTION, ACCESSED VIA CA WEB, SHOULD BE USED TO CONFIRM YOUR RECORD DATE POSITION HISTORY.

Participants not responding to the above option by 8:00 P.M New York time on **12/23/2015**, will receive the non-arm's length interest payment at the Unfavorable rate (less 25% Canadian non-resident tax withholding – default option).

If there are any questions regarding this Important Notice or the processing of related instructions via CA Web, participants should contact DTCC's Customer Service Center at (888) 382-2721.

***Important Legal Information:** The Depository Trust Company ("DTC") does not represent or warrant the accuracy, adequacy, timeliness, completeness or fitness for any particular purpose of the information contained in this communication, which is based in part on information obtained from third parties and not independently verified by DTC and which is provided as is. The information contained in this communication is not intended to be a substitute for obtaining tax advice from an appropriate professional advisor. In providing this communication, DTC shall not be liable for (1) any loss resulting directly or indirectly from mistakes, errors, omissions, interruptions, delays or defects in such communication, unless caused directly by gross negligence or willful misconduct on the part of DTC, and (2) any special, consequential, exemplary, incidental or punitive damages.*

To ensure compliance with Internal Revenue Service Circular 230, you are hereby notified that: (a) any discussion of federal tax issues contained or referred to herein is not intended or written to be used, and cannot be used, for the purpose of avoiding penalties that may be imposed under the Internal Revenue Code; and (b) as a matter of policy, DTC does not provide tax, legal or accounting advice and accordingly, you should consult your own tax, legal and accounting advisor before engaging in any transaction.

Brookfield

Brookfield Renewable Energy Partners L.P.
CUSIP: G16258108

2015 Distribution – Breakdown for Canadian Withholding Tax Purposes

Record date		Feb. 27, 2015	May 29, 2015	Aug. 31, 2015	Nov. 30, 2015
Payment date		Mar. 31, 2015	Jun. 30, 2015	Sep. 30, 2015	Dec. 31, 2015
Sourcing	Type	Amount (\$US)	Amount (\$US)	Amount (\$US)	Amount (\$US)
Canadian	Interest – “non-arm’s length” ¹	\$0.0502	\$0.0507	\$0.0513	\$0.0513
	Dividend	\$0.2213	\$0.2220	\$0.2540	\$0.2867
Total amount potentially subject to Canadian withholding tax		\$0.2715	\$0.2727	\$0.3053	\$0.3380
Return of Capital		\$0.0895	\$0.1423	\$0.1097	\$0.0589
Total Canadian Source		\$0.3610	\$0.4150	\$0.4150	\$0.3969
Non-Canadian Source (Bermuda, gross)		\$0.0540	\$0.0000	\$0.0000	\$0.0181
Total distribution		\$0.4150	\$0.4150	\$0.4150	\$0.4150

2015 Distribution – Breakdown for U.S. Withholding Tax Purposes

Record date		Feb. 27, 2015	May 29, 2015	Aug. 31, 2015	Nov. 30, 2015
Payment date		Mar. 31, 2015	Jun. 30, 2015	Sep. 30, 2015	Dec. 31, 2015
Sourcing	Type	Amount (\$US)	Amount (\$US)	Amount (\$US)	Amount (\$US)
U.S.	Interest – non Portfolio, non-bank deposit interest	\$0.0	\$0.0	\$0.0	\$0.0
	Interest – Portfolio, bank deposit interest	\$0.0	\$0.0	\$0.0	\$0.0
	Dividend	\$0.0	\$0.0	\$0.0	\$0.0
	Other income	\$0.0	\$0.0	\$0.0	\$0.0
	Return of capital	\$0.0	\$0.0	\$0.0	\$0.0
Non-U.S.	Interest – non Portfolio, non-bank deposit interest	\$0.0	\$0.0	\$0.0	\$0.0
	Interest – Portfolio, bank deposit interest	\$0.0	\$0.0	\$0.0	\$0.0
	Dividend	\$0.0	\$0.0	\$0.0	\$0.0
	Other income	\$0.0	\$0.0	\$0.0	\$0.0
	Return of capital	\$0.0	\$0.0	\$0.0	\$0.0
Total amount potentially subject to U.S. withholding tax		\$0.0	\$0.0	\$0.0	\$0.0
Total distributions		\$0.4150	\$0.4150	\$0.4150	\$0.4150

¹ Not eligible for any Canadian domestic withholding tax exemption, however, the applicable rate of withholding tax may be applied by one of Canada’s tax treaties, where applicable.