ATCO
GROUP

Corporate Office

04046361

Telephone: (403) 292-7912
Facsimile: (403) 292-7623
e-mail: sharlene.matheson@atco.com

November 16, 2004

Securities and Exchange Commission
Judiciary Plaza
450-5th Street, NW
Washington, DC 20549

SUPPL

ATCO Ltd.
File No.: 82-34745
Exemption Pursuant to Rule 12g3-2(b)

Dear Sir or Madam:

Pursuant to Rule 12g3-2(b) under the Securities Exchange Act of 1934, as amended, enclosed is a copy of the following:

- Press Release, Dated November 16, 2004 - Dividend Declaration

As required pursuant to Rule 12g3-2(b), the exemption number appears in the upper right-hand corner of each unbound page and of the first page of each bound document.

Please indicate your receipt of the enclosed by stamping the enclosed copy of this letter and returning it to the sender in the enclosed self-addressed, stamped envelope.

Regards,

ATCO Ltd.
A Member of the ATCO Group of Companies

SC Matheson

Sharlene C. Matheson, STI
Corporate Secretarial Department

Enclosure(s)

dw 12/1

FILE NO. 82-34745

ATCO GROUP

NewsRelease

ATCO LTD. & CANADIAN UTILITIES LIMITED
Corporate Head Office: 1500, 909 -11 Avenue S.W. Calgary, Alberta T2R 1N6 Telephone: (403) 292-7500 Fax: (403) 292-7532

For Immediate Release

ATCO Ltd. Declares Quarterly Dividend

CALGARY, November 16, 2004 – The Board of Directors of ATCO Ltd. has declared the following quarterly dividends:

Shares	TSX Stock Symbol	Dividend Per Share ($)	Record Date (2004)	Payment Date (2004)
Class I Non-Voting	ACO.X	0.35	15-Dec	31-Dec
Class II Voting	ACO.Y	0.35	15-Dec	31-Dec

ATCO Group is an Alberta based, worldwide organization of companies with more than 7,000 employees actively engaged in Power Generation, Utilities and Global Enterprises. More information about ATCO Ltd. can be found on its website, www.atco.com.

Contact: K.M. (Karen) Watson
Senior Vice President
and Chief Financial Officer
ATCO Ltd.
(403) 292-7502

ATCO
GROUP

Corporate Office

SEC MAIL PROCESSING RECEIVED NOV 4 ? 2004 WASH. D.C. 179 SECTION

SUPPL

Telephone: (403) 292-7909
Telefax: (403) 292-7623
e-mail: leslie.lawson@atco.com

November 11, 2004

Securities and Exchange Commission
Judiciary Plaza
450-5th Street, NW
Washington, DC 20549

SEC MAIL PROCESSING RECEIVED NOV 3 ? 2004 WASH. D.C. 179 SECTION

PROCESSING RECEIVED NOV 2 3 2004 179 WASH. D.C. SECTION

ATCO Ltd.
File No.: 82-34745
Exemption Pursuant to Rule 12g3-2(b)

Dear Sir or Madam:

Pursuant to Rule 12g3-2(b) under the Securities Exchange Act of 1934, as amended, enclosed is a copy of the following:

- Corporation's Form 1, filed November 8, 2004 for symbol ACO.X
- Corporation's Form 1, filed November 8, 2004 for symbol ACO.Y
- Corporation's Form 1, filed November 8, 2004 for symbol ACO.PR.A
- Insider Report, filed November 8,2004 relating to a Normal Course Issuer Bid

As required pursuant to Rule 12g3-2(b), the exemption number appears in the upper right-hand corner of each unbound page and of the first page of each bound document.

Please indicate your receipt of the enclosed by stamping the enclosed copy of this letter and returning it to the sender in the enclosed self-addressed, stamped envelope.

Regards,

L Lawson

Leslie Lawson
Corporate Secretarial Administrator

Encl.

FILE NO. 82-34745

Form 1 Submission - Change in Issued and Outstanding Securities

Issuer :	Atco Ltd.
Symbol :	ACO.X
Reporting Period:	10/01/2004 - 10/31/2004

Summary

Issued & Outstanding Opening Balance :	26,304,980	As at :	10/01/2004

Effect on Issued & Outstanding Securities

Employee Stock Option Plan	28,700
Other Issuances and Cancellations	-4,600
Issued & Outstanding Closing Balance :	26,329,080

Employee Stock Option Plan

Stock Options Outstanding Opening Balance: **1,029,600** As at : 10/01/2004

Effective Date	SAR	Options Granted	Options Exercised	Options Cancelled	SAR Reduction in Reserve
10/31/2004	N		28,700		
Totals		0	28,700	0	0

Stock Options Outstanding Closing Balance: **1,000,900** As at : 10/31/2004

Other Issuances and Cancellations

Effective Date	Transaction Type	Number of Securities
10/31/2004	Conversion (General)	100
10/31/2004	Issuer Bid	-4,700
Totals		-4,600

Filed on behalf of the Issuer by:

Name:	Leslie Ann Lawson
Phone:	403-292-7909
Email:	leslie.lawson@atco.com
Submission Date:	11/08/2004 20:09:02
Last Updated:	11/08/2004 20:06:51

FILE NO. 82-34745

Form 1 Submission - .Change in Issued and Outstanding Securities

Issuer :	Atco Ltd.
Symbol :	ACO.Y
Reporting Period:	10/01/2004 - 10/31/2004

Summary

Issued & Outstanding Opening Balance :	3,502,852	As at :	10/01/2004
	Effect on Issued & Outstanding Securities		
Other Issuances and Cancellations	-100		
Issued & Outstanding Closing Balance :	3,502,752		

Other Issuances and Cancellations

Effective Date	Transaction Type	Number of Securities
10/31/2004	Conversion (General)	-100
Totals		-100

Filed on behalf of the Issuer by:

Name:	Leslie Ann Lawson
Phone:	403-292-7909
Email:	leslie.lawson@atco.com
Submission Date:	11/08/2004 20:10:32
Last Updated:	11/08/2004 20:09:58

FILE NO. 82-34745

Form 1 Submission - .Change in Issued and Outstanding Securities

Issuer :	Atco Ltd.
Symbol :	ACO.PR.A
Reporting Period:	10/01/2004 - 10/31/2004

Summary

Issued & Outstanding Opening Balance :	6,000,000	As at :	10/01/2004

Effect on Issued & Outstanding Securities

Other Issuances and Cancellations	0
Issued & Outstanding Closing Balance :	6,000,000

Other Issuances and Cancellations

Effective Date	Transaction Type	Number of Securities
Totals		0

Filed on behalf of the Issuer by:

Name:	Leslie Ann Lawson
Phone:	403-292-7909
Email:	leslie.lawson@atco.com
Submission Date:	11/08/2004 20:10:56
Last Updated:	11/08/2004 20:10:52

Insider transaction detail - View details for insider

2004-11-01 19:13 ET

Transactions sorted by : **Insider**
Insider company name : **ATCO Ltd. (Starts with)**
Transaction date range : **October 1, 2004 - October 31, 2004**

Insider name: ATCO Ltd.

Legend: O - Original transaction, A - First amendment to transaction, A' - Second amendment to transaction, AP - Amendment to paper filing, etc.

Insider's Relationship to Issuer: 1 - Issuer, 2 - Subsidiary of Issuer, 3 - 10% Security Holder of Issuer, 4 - Director of Issuer, 5 - Senior Officer of Issuer, 6 - Director or Senior Officer of 10% Security Holder, 7 - Director or Senior Officer of Insider or Subsidiary of Issuer (other than in 4,5,6), 8 - Deemed Insider - 6 Months before becoming Insider.

Warning: The closing balance of the " equivalent number or value of underlying securities" reflects the" total number or value of underlying securities" to which the derivative contracts held by the insider relate. This disclosure does not mean and should not be taken to indicate that the underlying securities have, in fact, been acquired or disposed of by the insider.

Transaction ID	Date of transaction YYYY-MM-DD	Date of filing YYYY-MM-DD	Ownership type (and registered holder, if applicable)	Nature of transaction	Number or value acquired or disposed of	Unit price or exercise price	Closing balance	Insider's calculated balance	Conversion or exercise price	Date of expiry or maturity YYYY-MM-DD	Underlying security designation	Equivalent number or value of underlying securities acquired or disposed of	Closing balance of equivalent number or value of underlying securities
Issuer name: ATCO LTD.													
Insider's Relationship to Issuer: 1 - Issuer													
Security designation: Non-Voting Shares Class I													
345020	2004-10-08	2004-11-01	Direct Ownership :	38 - Redemption, retraction, cancellation, repurchase	+4,700	51.6700	4,700						

Transaction ID	Date of transaction YYYY-MM-DD	Date of filing YYYY-MM-DD	Ownership type (and registered holder, if applicable)	Nature of transaction	Number or value acquired or disposed of	Unit price or exercise price	Closing balance	Insider's calculated balance	Conversion or exercise price	Date of expiry or maturity YYYY-MM-DD	Underlying security designation	Equivalent number or value of underlying securities acquired or disposed of	Closing balance of equivalent number or value of underlying securities
345022	2004-10-08	2004-11-01	Direct Ownership :	38 - Redemption, retraction, cancellation, repurchase	-4,700		0						