

August 28, 2018

ELECTRONICALLY FILED

British Columbia Utilities Commission  
Suite 410, 900 Howe Street  
Vancouver BC V6Z 2N3

Attention: Mr. Patrick Wruck,  
Commission Secretary

Dear Mr. Wruck:

**Pacific Northern Gas Ltd (PNG) and Triton LNG Limited Partnership (Triton) Letter Agreement (the Letter Agreement) Application - Project No.1598957**

**PNG's Request for Amendment to Regulatory Timetable**

We write further to PNG's letter dated August 27, 2018 wherein it requests an amendment to the Regulatory Timetable previously approved under Commission Order G-134-18.

Subject to the comments below, Western takes no position on PNG's request for an extension of the response date for the Panel Information Requests, from August 29 to August 31 and an extension for the submission of PNG's written Final Argument, from August 30 to September 7. However, for the reasons described below, PNG's proposal of a one-week extension to the previously established dates for Intervener Final Arguments would be highly prejudicial to Western.

In reliance on the schedule approved under Commission Order G-134-18, legal counsel for Western LNG had reorganized various work commitments. A number of commitments between August 30 and September 7 were cleared or rescheduled to attend to written argument on this matter. More significantly, work commitments will have counsel travelling out of town almost all of the week of September 10. Further, there are a number of travel days and full day work commitments plus various lesser commitments scheduled during the week of September 17.

Under Order G-134-18, Western is currently provided the period between August 30 and September 7 for its written argument. In order to provide for an equivalent period of clear time

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(if PNG's deadline for written argument is extended), an extension until September 27 would be required for Western LNG's written argument.<sup>1</sup>

We believe it is unfortunate that PNG submitted this request (and its earlier schedule requests) without consulting any of the other affected parties prior to involving the Commission. By chance, Western LNG was not prejudiced by the earlier proposed schedule amendments. However, in this instance, the revised schedule proposed by PNG would be highly prejudicial to Western.

To mitigate the prejudice to Western from PNG's schedule adjustment, the alternatives would be either to (i) maintain the existing schedule for written argument or (ii) shift the date for Intervenor Written Final Argument to September 27.

Yours very truly,

LAWSON LUNDELL LLP



Keith Bergner\*

\*Law Corporation

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<sup>1</sup> Even ignoring the days on which counsel is unavailable, we note that the resulting 20-day interval (September 7 to 27) is still shorter than the 22-day interval between Western's last filing and PNG's proposed filing date (August 16 to September 7).