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Sent via eFile and E-Mail

September 7, 2018

B.C. Utilities Commission
Suite 410 - 900 Howe Street
Vancouver, BC V6Z 2N3

File No.: 4.2.7 (2018)

Attention: Patrick Wruck
Commission Secretary and Manager, Regulatory Support

Dear Mr. Wruck:

**Re: Pacific Northern Gas Ltd.
Application for Approval of Letter Agreement between
Pacific Northern Gas Ltd. and Triton LNG Limited Partnership
Request to Suspend Proceeding**

Pacific Northern Gas Ltd. (PNG) writes in connection with the referenced application seeking approval of the Letter Agreement between PNG and Triton LNG Limited Partnership (Triton). PNG respectfully requests the Commission provide an order of suspension of the regulatory process for this application as of today's date, including suspension of remaining items in the regulatory timetable, inclusive of PNG's responses to Commission Panel information requests.

With increased expressions of interest to contract for capacity on PNG's transmission system, PNG would like to establish a platform for multilateral discussions with interested parties with a view to further exploring processes for the allocation of existing and expansion capacity. PNG views the suspension of the proceeding and the anticipated discussions to be an opportunity to consider the concerns expressed by stakeholders both in this proceeding and outside it, and to allow for discussion and the gathering of further insights on process-related matters outside of the regulatory arena.

Identified interested parties that PNG would invite to participate in these multilateral discussions would include Triton and Western LNG (Western), as well as other third parties that have expressed an interest in contracting with PNG for capacity.

PNG's view that suspension of the proceeding would be appropriate is informed in part by consideration of the Commission Panel information requests. Certain of the questions inquire into what is "feasible", or what "could" or "would" be done to improve PNG's processes. PNG believes it would be in the interest of ratepayers to consider such issues

within a broader framework in which broader input could be obtained and discussion could occur.


PNG acknowledges the late timing of this request in consideration of the regulatory timetable in place. PNG wished to ensure before submitting this request that Triton, to whom PNG has existing commitments including to take all steps reasonably required to secure Commission approval of the Letter Agreement (Ex. B-1, App. A, s. 2), was consulted. PNG has consulted Triton and is now in a position to report that Triton supports this request to suspend the proceeding; PNG appreciates Triton's willingness to explore processes that are beneficial to all stakeholders.

PNG notes that it has advised the representatives and counsel of both Western and BCOAPO et al., the registered interveners in this proceeding, of the intent to seek a suspension of the proceeding.

Upon approval of this request, PNG commits to report to the Commission on the progress of discussions and proposed processes by the end of October 2018.

Please direct any questions regarding this matter to my attention.

Yours truly,

A handwritten signature in cursive script that reads "J.P. Kennedy". The signature is written in black ink and is positioned below the text "Yours truly,".

J.P. Kennedy

cc: Triton – Dan Woznow
Western – Davis Thames
Western – Keith Bergner (Lawson Lundell)
BCOAPO – Leigha Worth