REGULATORY
LAW CHAMBERS

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Our matter #: 1081.001

December 23, 2019

VIA E-Filing

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

Attention: Patrick Wruck, Commission Secretary

Dear Mr. Wruck,

Re: Project No. 1598984
British Columbia Utilities Commission ("BCUC")
Kinder Morgan Canada (Jet Fuel) Inc. ("KMJF") 2019 Tariff Filing Proceeding regarding Application for Proposed Tariff No. 40
KMJF Response to Vancouver Airport Fuel Facilities Corporation ("VAFFC") December 19, 2019 Submission

On December 19, 2019, VAFFC filed a letter with the BCUC alleging there is information which the BCUC has directed KMJF to produce in Order P-10-19,[1] (the "**BCUC Order**") but which KMJF has neither provided nor explained otherwise.[2]

KMJF advises that it has provided all information and documents in its possession regarding the information requested by VAFFC. The information KMJF has provided supports the level and types of costs incurred during the previously negotiated toll period KMJF notes VAFFC statements regarding KMJF's failure to comply with the BCUC's Order are inaccurate. For example, VAFFC incorrectly claims that "KMJF's failure to provide virtually any specific details or supporting documents for the years 2009 to 2018 in the categories of Direct Field Expenses and A&G Costs specified in the Order." However, the BCUC directed, "KMJF must provide a full and better response to each of the components of the IR [22.1] (a to i), including a schedule for all Direct Field Expenses costs for each year from 2009." Consistent with the BCUC Order, KMJF provided a schedule for all Direct Field Expenses costs from 2009 to 2018. The information that KMJF provided reflects all the information KMJF obtained and has in its possession.

1 A-18 2019-11-19 Order P-10-19 from BCUC to KMJF re Reasons for Decision and Regulatory Timetable.

2 C2-14 2019-12-19 Submission from VAFFC to BCUC re Request to Suspend Timetable.

KMJF also confirms that the materials provided to date constitute the entirety of Mr. Wetmore's working file and all written instructions or directions given to Mr. Wetmore.

Yours truly,

<*Submitted electronically*>

Rosa Twyman
Regulatory Law Chambers

cc: Susan Kittey, Legal Counsel for KMJF
Colm Boyle, Legal Counsel for Pembina
KMJF Shippers