



June 22, 2020

British Columbia Utilities Commission
6th Floor, 900 Howe Street
Vancouver, BC
V6Z 2N3

Attention: Mr. Patrick Wruck, Commission Secretary

Dear Mr. Wruck:

Re: FEI Complaint filed by Cascadia Energy, Direct Energy, Access Gas (the “Complaint”)
Absolute Energy – Letter of Comment dated June 5, 2020

This letter sets out the reply of Cascadia Energy Ltd. (“Cascadia”), Direct Energy Marketing Limited (“Direct”), and Access Gas Services Inc. (“Access”) to Absolute Energy’s letter dated June 5, 2020 (the “Letter”). For ease of reference, Cascadia, Direct and Access are collectively referred to as the BC Gas Marketers Coalition (“BC GMC”).

The BC GMC is of the view that the Letter should be disregarded or given no weight. Our reasons follow.

The complaint review process established for the Complaint did not invite any letters of comment. In addition to being outside of the review process set by the Commission, the Letter was filed well beyond the close of the review record.

Final written arguments have been submitted by both sides of this Complaint. The process, as understood by the BC GMC, was complete when BC GMC filed its Reply Argument on 28 May 2020. Absolute seeks to re-open the process without giving any reason, other than Absolute feels “at this time it is prudent to provide comments”. Absolute notes that it was following the proceeding, but does not explain why it waited until now to seek to get involved.

Nearly one year ago, the BC GMC extended an offer to Absolute Energy to participate in these proceedings. That offer was declined. Absolute Energy had ample time to seek participation in the Complaint. Filing a letter of comment weeks after the process has completed is improper and unfair.

Absolute provides no evidence or insight that is helpful to the Complaint. The fact that Absolute Energy does not share the same concerns as the BC GMC does not in any way lessen or invalidate the legitimate concerns that the BC GMC has raised throughout the Complaint.

In its comments dated 17 June 2020, FEI cites a few lines from the Absolute Letter and then departs from commenting on Absolute’s Letter in favour of repeating its previously filed argument. FEI adds nothing new, but seeks to take the opportunity to continue arguing its case.

The Commission should disregard the comments from Absolute and FEI. Otherwise, there is no end to the process, and the Commission's procedural directions lose their meaning. All of which is procedurally and substantively unfair to BC GMC, and inefficient and costly for the participants and the Commission.

Respectfully,



Cascadia Energy
Nick Caumanns



Direct Energy
Nicole Black



Access Gas
James Bartlett