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BY ELECTRONIC FILING

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British Columbia Utilities Commission
6th Floor – 900 Howe Street
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Attention: Marija Tresoglavic, Acting Commission
Secretary

Dear Sirs and Mesdames:

**Kinder Morgan (Jet Fuel) Inc. (PKMJF) 2019 Tariff Filing
Project No. 1598984
Parkland Refining (B.C.) Ltd. (Parkland) Extension Request**

We are counsel to Parkland in the above-noted proceeding. We have received PKMJF's supplemental responses to information requests and confidential documents.¹ We have also received the Vancouver Airport Fuel Facilities Corporation's (VAFFC) request for an extension to the deadline for the filing of intervenor evidence in this proceeding and request for access to unredacted copies of some of the material that PKMJF filed confidentially and in redacted form.²

Parkland supports VAFFC's request for an extension to the deadline for filing intervenor evidence and submits its own corresponding request. PKMJF's recent filings are voluminous and relevant to the evidence that Parkland intends to submit in this proceeding. Parkland and its consultants will require additional time to review this evidence, especially in light of the heavily redacted nature of the documents provided.

Therefore, Parkland requests that the Commission extend the deadline for the filing of intervenor evidence to **October 27, 2020**. Parkland submits that such an extension will provide intervenors sufficient time to consider the information PKMJF has provided, but will not result in further unnecessary delay to the overall proceeding.

Parkland also echoes VAFFC's frustration with respect to the redactions contained in the documents included in the confidential Appendix A to PKMJF's supplemental information request responses. The nature of the redactions suggests that PKMF has redacted material

¹ Exhibits B-48 and B-48-1.

² Exhibit C2-31.

relevant to the jet fuel pipeline, as demonstrated in Confidential Schedule 1 to VAFFC's request for unredacted copies of PKMJF's confidential filing.³

Furthermore, the supplemental information request responses appear to contain information that PKMJF ought to have put before the Commission when it was given the opportunity to amend its application following Pembina Pipeline Corporation's acquisition of the jet fuel pipeline. This includes, among other things, information relating to operating expenses and useful life estimates for the jet fuel pipeline. Despite the availability of such information, PKMJF submitted that no amendments to KMJF's application was necessary.⁴

Nevertheless, Parkland is concerned about the further delay that would be required for a process to adjudicate the propriety of PKMJF's redactions. Parkland and its consultants have reviewed the unredacted information and believe there is sufficient information to prepare intervenor evidence. Of course, that intervenor evidence will be qualified by any assumptions Parkland and its consultants are required to make to fill the gaps left by PKMJF's redactions or failure to provide relevant information the interveners have requested. Parkland intends to address in final argument the nature of the redactions, any necessary assumptions to fill the gaps, and the overall nature of the evidentiary record before the Commission.

Yours very truly,

LAWSON LUNDELL LLP

A handwritten signature in black ink, appearing to read "Will Shaw", with a stylized flourish at the end.

Will Shaw

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³ Exhibit C2-31, at Schedule 1.

⁴ Exhibit B-33.