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**From:** BCUC <web.administrator@bcuc.com>  
**Sent:** Wednesday, October 7, 2020 10:23 AM  
**To:** Commission, Secretary  
**Subject:** Request to Intervene

**Date Submitted:** October 07, 2020

**Proceeding name:** Parkland - Advance Ruling on Confidentiality for FPTA Reporting Submissions

## Participant contact information

**Organization or individual name:** Imperial Oil

**City:** Calgary

**Province:** Alberta

**Email:** scott.r.gordon@esso.ca

**Phone number:** 587.476.4406

## For organizations only - representative contact information

**Name:** Imperial Oil

**Organization (if different from above):** Osler, Hoskin & Harcourt LLP

**City:** Calgary

**Province:** Alberta

**Email:** TGelbman@osler.com

**Phone number:** 403.968.9908

**Also representing (if applicable):**

## Additional information

**Please state your reasons for intervening in this proceeding:**

Imperial is an integrated energy company that explores for, produces, refines and markets products essential to society across the full value chain. We are a leading marketer of fuels, lubricants, asphalts and specialty products and our retail brands, Esso and Mobil, are familiar to consumers across Canada. Imperial shares many of the concerns raised by Parkland in its Request for Advance Ruling on Confidentiality for Fuel Price Transparency Act Reporting Submissions,

dated September 16, 2020, relating to confidentiality of commercially and competitively sensitive information required to be disclosed under the Fuel Price Transparency Act (“FPTA”) and associated Regulations (the “Regulations”).

**Please state how you are directly or sufficiently affected by the Commission's decision in this matter; or describe your experience, information, or expertise relevant to this matter that would contribute to the Commission's decision making:**

As a “responsible person” (as defined by the FPTA), a significant “importer of reportable fuel” (as defined by the Regulations), a “wholesale purchaser of reportable fuel” (as defined by the Regulations) and a “person who stores reportable fuel” (as defined by the Regulations), Imperial will be required to disclose commercially and competitively sensitive information to the BCUC in accordance with the FPTA and the Regulations. As such, Imperial has a clear and direct interest in these proceedings.

**Please list the key issues you intend to address in the proceeding:**

The key issues for Imperial include, but are not limited, to the issues noted in previous submissions to the BCUC relating to confidentiality of commercially sensitive and competitive data required to be disclosed under the FPTA and the Regulations.

## **For administrative purposes only**

**Do you intend to participate fully, including attendance at hearings and submission of evidence or information requests, if applicable?:** Yes

**Do you intend to request PACA funding? This does not impact your ability to participate:** No

**Have you or your organization web-registered as an intervener or interested party in the past 12 months?:** No

**If yes, please provide your username:**