

Date Submitted: January 06, 2021

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

Participant contact information

Organization or individual name: British Columbia Old Age Pensioners' Organization, Council of Senior Citizens' Organizations of BC, Disability Alliance BC, Active Support Against Poverty, Together Against Poverty Society, and Tenants Resource and Advisory Centre ("BCOAPO et al.")

City: Vancouver

Province: British Columbia

Email: support@bcpiac.org

Phone number: 604-687-3063

For organizations only - representative contact information

Name: Leigha Worth & Irina Mis (please add ed@bcpiac.org; imis@bcpiac.org; Bill Harper (bharper.consultant@bell.net) to the distribution list)

Organization (if different from above): BC Public Interest Advocacy Centre

City: Vancouver

Province: British Columbia

Email: ed@bcpiac.org

Phone number: 604-687-3034

Also representing (if applicable):

Additional information

Please state your reasons for intervening in this proceeding:

We are intervening in this process on behalf of a large and diverse cross-section of British Columbians who are impacted, either directly or indirectly, by the cost of fuel. Parkland has made application for an advanced ruling on the confidentiality of a large amount of information it and other market players are required to file with the BCUC under the Fuel Price Transparency Act, including a request that all such information not be provided to parties outside the BCUC even should they be able to satisfy the Commission that they are not a competitor that might benefit from such information and they execute a confidentiality agreement. Our clients are individuals whose interests the government sought to protect through the enactment of the FPT Act and we are intervening to ensure that the degree of deference given requests like Parkland's is not greater than absolutely necessary and that any deference given does not defeat the purpose of this Act.

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:

Our clients' members and clients number almost a hundred thousand British Columbians whose interests are clearly engaged by this issue - there are few who can claim to be wholly indifferent to and insulated from the cost of fuel. We have intervened on behalf of residential consumers before the BCUC for decades, and we intend to address this issue in the same manner we have in our other interventions.

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

We intend to examine the proposed terms of Parkland and other market players' proposed terms are reasonable and feasible given the provisions of the FPT Act or whether they would serve to frustrate the purpose and operation of that legislation. We intend to determine whether there are other, less overbroad ways of protecting the commercial interests of the market players and to assist the Commission in its determination of whether those interests outweigh the public interest in having such information made public as many would argue was the purpose of the FPT Act. We also reserve the right to examine such other issues as they arise or come to our attention.

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: Yes

Have you or your organization web-registered as an intervener or interested party in the past 12 months?: Yes