

Sent: Wednesday, January 6, 2021 11:14 AM
To: Commission, Secretary
Subject: Request to Intervene

Date Submitted: January 06, 2021

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

Participant contact information

Organization or individual name: AFD Petroleum Ltd.

City: Edmonton

Province: Alberta

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For organizations only - representative contact information

Name: Matthew Gibbons

Organization (if different from above):

City: Edmonton

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Phone number: 780-996-8422

Also representing (if applicable):

Additional information

Please state your reasons for intervening in this proceeding:

AFD is a privately held, mid-sized fuel solutions provider. The Fuel Price Transparency Act (FTP Act) and associated reporting guidelines require that AFD submit commercially and competitively sensitive information to the BCUC as part of the FTP Act. As an importer, wholesaler, and supplier to retail participants, AFD is directly affected by the outcome of these proceedings.

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 privately held entity, AFD holds data pertaining to purchase and sale price, quantities purchased and sold, and other customer and vendor information strictly confidential so as to protect competitive advantage and trade secrets. Publication of sensitive data has the potential to materially harm AFD's interests and erode the ability of AFD to be competitive in the BC market. Additionally, AFD does not yield the same market-influencing power as the major fuel marketers, refiners, and major retailers in BC. As such, AFD would like to provide perspective to these proceedings from the vantage point of small to medium sized market participant and provide input on a potential framework going forward.

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

a. The extent to which AFD will be negatively impacted if sensitive and confidential price information is made publicly available. b. Providing input towards the development of a framework for how protected information may be handled and published so as to protect confidentiality while still achieving the stated goals of the FPT Act.

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?: Yes