

To: [BCUC](#)
Subject: Letter of Comment - Parkland - Advance Ruling on Confidentiality for FPTA Reporting Submissions - Jennifer Stewart
Date: Tuesday, January 12, 2021 12:43:15 PM
Attachments: [CIPMA - Letter of Comment BCUC Consultation 01122021.pdf](#)

Date Submitted: January 12, 2021

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

Are you currently registered as an intervener or interested party: [REDACTED]

Name (first and last): Jennifer Stewart

City: Ottawa

Province: Ontario

Email: jstewart@cipma.org

Phone number:

Comment:

The Canadian Independent Petroleum Marketers Association represents the voice of Canada's small and medium-sized fuel marketers . The development of the Confidential Information Framework for Fuel Price Data Reporting and the outcomes of this Advance Ruling on Confidentiality for FPTA Reporting Submissions process will have a direct impact on our members.

January 12, 2021

Commission Secretary
British Columbia Utilities Commission
900 Howe Street
Suite 410
Vancouver, BC V6Z 2N3

Subject: CIPMA Letter of Comment in response to BCUC Hearing to Establish Confidential Information Framework for Fuel Price Data Reporting

On behalf of the Canadian Independent Petroleum Marketers Association (CIPMA), please accept this letter of comment in response to the British Columbia Utilities Commission's hearing to establish a confidential information framework for Fuel Price Data Reporting.

As the Commission notes, the development of the framework and process will have an impact on our members. We appreciate having this opportunity to provide comment on the framework submitted in accordance with BC's *Fuel Price Transparency Act*.

CIPMA supports the spirit of the Act and its intentions to establish greater public transparency on the prices of gasoline and diesel fuel across the province. That said, we are concerned about the Act's ability to ensure appropriate safeguards are put in place to ensure the data collected does not in any way compromise the commercially sensitive and competitive information of retail companies.

It is our view that the pricing, volume, and customer/supplier information, should be kept confidential indefinitely. Further, broad aggregation may be possible, however, anonymization without broad aggregation would still expose our members to having their commercially sensitive information known by competitors.

Thank you for your consideration on this matter. We look forward to continuing an open dialogue with the Province of British Columbia to help ensure the legislation is effective once implemented.

Please do not hesitate to contact me should you have any questions or concerns.

Sincerely,



Jennifer Stewart
President and CEO
Canadian Independent Petroleum Marketers Association