



February 8, 2021

**PARKLAND – ADVANCE RULING ON CONFIDENTIALITY
FOR FPTA REPORTING EXHIBIT A-5**

Sent via email/efile

To: Affected Parties, *Fuel Price Transparency Act* Responsible Persons, Stakeholders and Members of the Public

Re: British Columbia Utilities Commission – Framework for the Determination of Confidentiality and Treatment of Protected Information collected pursuant to the *Fuel Price Transparency Act* – Issuance of Framework Draft No. 1

Further to the regulatory timetable established by Order [G-303-20](#) dated November 30, 2020, and pursuant to the *Fuel Price Transparency Act* (FPT Act), the British Columbia Utilities Commission (BCUC) hereby issues the Framework for Determination of Confidentiality and Treatment of Protected Information – Draft No. 1 (Framework Draft No. 1).

The BCUC invites written submissions and letters of comment on the Framework Draft No. 1 by Monday, March 8, 2021.

Additionally, the BCUC will be holding virtual information workshops regarding Framework Draft No. 1 on Thursday, February 18, 2021 and Monday, February 22, 2021.

Submissions Sought

As part of the process for developing Framework Draft No. 1, the BCUC received and considered 18 intervener submissions and 10 letters of comment. The BCUC thanks those who have participated to date for sharing their insights and perspectives. Utilizing this feedback, Framework Draft No. 1 was assembled as requested by the participants. The BCUC hopes that Framework Draft No. 1 will serve as foundation for additional dialogue and looks forward to refining the Framework further. To support this effort, the BCUC requests that interveners address, at a minimum, the following items in their submissions:

1. Should the final Framework for Determination of Confidentiality and Treatment of Protected Information (Final Framework) be implemented as an order to this proceeding or adopted as BCUC rules?
2. Are the Fuel Data identified as Protected Information in Framework Draft No. 1 reasonable and supportable? If so, please explain why and provide any supporting evidence you may have to justify protecting these items. If not, why not? (Appendix A)
3. Is there any Fuel Data that is marked as Protected Information in Framework Draft No. 1 that should not be? If so, why? (Appendix A)
4. Is there any Fuel Data that is not marked as Protected Information in Framework Draft No. 1 that should be? If so, why? (Appendix A)

5. Is the process proposed for requesting confidentiality over non-Protected Information, on an exception basis, the most regulatory-efficient process? If not, what alternative process would you recommend and why? (Section 4)
6. Is the undertaking and declaration process proposed for permitting access to Protected Information reasonable? Why or why not? (Section 5.1)
7. Are the process and considerations proposed for determining whether the public interest in the disclosure of Protected Information outweighs any potential harm to Responsible Persons reasonable? Why or why not? (Section 5.2)
 - i. If not, what alternative process and/or considerations should the BCUC consider and why?
8. Are the (i) aggregation; (ii) anonymization; and (iii) time release methodologies proposed appropriate? Why or why not? (Section 6.0)
 - i. If not, what alternative methodologies should the BCUC consider and why?
9. Are there any additional areas that should be addressed in Framework Draft No. 1? If so, please explain.
10. How should the BCUC treat Fuel Data that has been granted advanced approval of confidential status pursuant to Order G-275-20 dated October 30, 2020, following implementation of the Final Framework?
11. Any other submissions.

Information Workshops

The BCUC will be holding virtual workshops for interveners, interested parties and those who submitted letters of comment regarding Framework Draft No. 1. The purpose of these workshops is for BCUC staff to present Framework Draft No. 1 and to answer clarifying questions. Please note that the workshops are not intended as a forum for expressing comments on Framework Draft No. 1. The BCUC strongly encourages participants to provide written submissions or letters of comment on the Framework Draft No. 1, including the items noted above, by the March 8, 2021 deadline.

The workshops will be held virtually on Thursday, February 18, 2021 and Monday, February 22, 2021 from 9:00 a.m. to 10:30 a.m. PDT, however participants will be able to join the meeting from 8:45 a.m. onwards to test their audio and video connections. Audio from the sessions will be live-streamed on the Allwest Reporting Ltd. website, which can be accessed via the following link: <https://allwestbc.com/webcast.html>.

Registered interveners and others wishing to attend one or both of the workshops are required to register in advance via email to Commission.Secretary@bcuc.com or by telephone at 1-800-663-1385. The workshops will be hosted using Microsoft Teams. A link to the workshop will be provided upon registration. **Participants are requested to register by Tuesday, February 16, 2021.**

Sincerely,

Original signed by:

Marija Tresoglavic
Acting Commission Secretary

CD/ae
Enclosure



bcuc
British Columbia
Utilities Commission

Suite 410, 900 Howe Street
Vancouver, BC Canada V6Z 2N3
bcuc.com

P: 604.660.4700
TF: 1.800.663.1385
F: 604.660.1102

British Columbia Utilities Commission

Fuel Price Transparency Act

Framework for Determination of Confidentiality and Treatment of Protected Information Draft No. 1

February 8, 2021

TABLE OF CONTENTS

Page no.

1.0	General	1
1.1	Application of the Framework.....	1
1.2	Role of the BCUC	1
1.2.1	BCUC Accountability under the FPT Act.....	1
1.3	Determination of Confidentiality and Treatment of Protected Information Framework.....	2
2.0	Background	2
2.1	<i>Fuel Price Transparency Act</i>	2
2.1.1	Protected Information.....	2
3.0	Protected Information	3
3.1	Identification of Protected Information	3
3.1.1	Principles	3
3.1.2	Grouping Fuel Data Collected Pursuant to the FPT Act and FPT Regulation	4
3.2	Confidentiality of Protected Information.....	4
3.3	Submission Protocols for Protected Information.....	4
4.0	Requests for Confidential Treatment of Non-Protected Information	5
5.0	Disclosure of Protected Information and Other Confidential Materials	5
5.1	Undertaking and Declaration Regarding Confidentiality of Protected Information	5
5.2	Public Interest.....	5
6.0	Approaches for Making Protected Information Non-Confidential	6
6.1	Purpose.....	6
6.2	Aggregation	6
6.3	Anonymization	7
6.4	Passage of Time.....	7
7.0	Reconsideration of a BCUC Decision	7
	Appendix A – Identification of Protected Information and the BCUC Reporting Form Fields per Group	1
A1.	Background.....	1
A2.	Grouping of Fuel Data	1
A3.	Data Fields Contained in BCUC Groups	2



1.0 General

This Framework sets out the process pursuant to which the British Columbia Utilities Commission (BCUC) will determine what Fuel Data collected pursuant to the *Fuel Price Transparency Act* (FPT Act) constitutes Protected Information and the confidentiality thereof (Framework). Protected Information is defined under section 9 of the FPT Act.

This Framework is intended to efficiently address confidentiality requests respecting Fuel Data collected pursuant to the FPT Act and to provide clarity on the process the BCUC will follow for disclosing Fuel Data in order to meet the objectives of the FPT Act.

This Framework may, subject to notice and process, be revised or updated from time to time in order to adjust for evolving circumstances and/or changes to the FPT Act including any regulations, directions, or requests.

Notwithstanding the procedures provided for in this Framework, the BCUC may do whatever is appropriate and permitted by law to enable it to effectively and completely perform its duties as Administrator. In accordance with the *Administrative Tribunals Act*, the BCUC may waive or modify one or more of the provisions of the Framework in exceptional circumstances.

Capitalized terms not otherwise defined have the same meaning as in the FPT Act.

1.1 Application of the Framework

This Framework applies to all Responsible Persons required to submit data to the BCUC pursuant to the FPT Act or Regulations and any persons interested in accessing such information.

1.2 Role of the BCUC

By Order in Council (OIC) No. 123/20, and pursuant to Part 2 section 3 of the FPT Act, the BCUC is designated the Administrator of the FPT Act. As the Administrator, the BCUC is responsible for collecting Fuel Data to promote market competitiveness and public confidence in the competitiveness of the market, and for publishing Fuel Data pursuant to Part 3 section 9(2) of the FPT Act. The BCUC does not regulate fuel prices in BC.

1.2.1 BCUC Accountability under the FPT Act

Part 2 section 3 of the FPT Act provides that the Lieutenant Governor in Council may, under the FPT Act, by regulation, restrict or impose conditions on the exercise of powers, or the performance of duties, by the Administrator. Further, under section 4 of the FPT Act, the Administrator must report to the Minister as the Minister requires and must administer the FPT Act in accordance with any general or special directions of the Minister.

Application of this Framework is subject to the FPT Act, as well as the BCUC's compliance with all other applicable legislation, including privacy laws applicable to public bodies. Should there be any inconsistency between the Framework and the FPT Act, the legislation governs.

1.3 Determination of Confidentiality and Treatment of Protected Information Framework

In accordance with sections 2.1 and 4(1) of the *Utilities Commission Act* (UCA), and sections 11(1) and (2) of the *Administrative Tribunals Act*, the BCUC adopts this Framework for determining the confidentiality and treatment of Protected Information provided to the BCUC in accordance with its role as the Administrator of the FPT Act.

2.0 Background

2.1 Fuel Price Transparency Act

In November 2019, the Government of BC established the FPT Act. The FPT Act requires Responsible Persons engaged in a Reportable Activity to report on Fuel Data. The BCUC has been designated the Administrator of the FPT Act.

By OIC No. 474/20¹, the Lieutenant Governor in Council established the Fuel Price Transparency Regulations (FPT Regulations). The FPT Regulations require fuel importers, wholesalers, terminal owners/operators, and those who supply retail dealers to submit regular reports to the BCUC starting in November 2020.

In August 2020, the Government of BC issued a Special Direction to the BCUC², as the Administrator of the FPT Act, requiring retail dealers of reportable fuels to submit Fuel Data to the BCUC as part of a retail Fuel Data collection pilot (Retail Pilot). The Retail Pilot will be used to inform the development of regulations for fuel retailers by the Government of BC.

Pursuant to section 6 of the FPT Act, Responsible Persons are required to submit any Fuel Data and/or records required by the BCUC in its capacity as Administrator.

2.1.1 Protected Information

Section 9 of the FPT Act defines “protected information” as information that would reveal:

- (a) Trade Secrets of a Responsible Person, or
- (b) commercial, financial, labour relations, scientific or technical information of or about a responsible person.

Under section 9(2) of the FPT Act, the Administrator may publish Fuel Data, or other information or records, acquired pursuant to the FPT Act if it is satisfied that:

- (a) Protected Information will not be disclosed, or
- (b) the public interest in the Protected Information that will be disclosed outweighs any potential harm to Responsible Persons, having regard, without limitation, to the importance of:
 - (i) the competitiveness of the market for reportable fuels, and
 - (ii) public confidence in the competitiveness of that market.

¹ https://www.bclaws.gov.bc.ca/civix/document/id/oic/oic_cur/0474_2020

² https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/natural-gas-oil/responsible-oil-gas-development/special_direction_to_bcuc_retail111787_v3_mbrsig08132020.pdf

Trade Secret is defined in the *Freedom of Information and Protection of Privacy Act* (FOIPPA) and means information, including a formula, pattern, compilation, program, device, product, method, technique or process, that:

- (a) is used, or may be used, in business or for any commercial advantage,
- (b) derives independent economic value, actual or potential, from not being generally known to the public or to other persons who can obtain economic value from its disclosure or use,
- (c) is the subject of reasonable efforts to prevent it from becoming generally known, and
- (d) the disclosure of which would result in harm or improper benefit.

3.0 Protected Information

In its role as Administrator, the BCUC collects a wide range of Fuel Data from Responsible Persons. Subject to the following, and to other related statutory provisions and exceptions or exclusions by law, including the FPT Act, the FOIPPA, the UCA and the *Administrative Tribunals Act*, Fuel Data or other information and records filed by Responsible Persons pursuant to the FPT Act may be made publicly available.

For greater certainty, nothing in this Framework is intended to limit the operation of any statutory provision that protects the confidentiality of Fuel Data or other information and records filed by Responsible Persons pursuant to the FPT Act.

3.1 Identification of Protected Information

3.1.1 Principles

In developing this Framework, the BCUC considered whether all Fuel Data should, by default, be kept confidential. However, in the BCUC's view, it is important to set out the key principles guiding the determination of Protected Information and then to categorize Fuel Data based on the level of commercial sensitivity.

In determining what Fuel Data constitutes Protected Information, the BCUC shall be guided by the following key principles:

1. Promotion of transparency – where possible, Fuel Data or other information and records collected pursuant to the FPT Act should be publicly available.
2. Promotion of market competitiveness – balancing the restriction of disclosure of Fuel Data or other information and records collected pursuant to the FPT Act or regulations when such disclosure could be reasonably expected to (i) undermine the competitiveness of the BC fuel industry or the public confidence in that market's competitiveness, or (ii) cause significant harm to a Responsible Person against the public interest in such disclosure.
3. Reducing regulatory burden – the BCUC's process should be administratively efficient to limit the administrative burden placed on Responsible Persons and others. Determinations of confidentiality should be consistent for the Fuel Data or other information and records collected pursuant to the FPT Act.

3.1.2 Grouping Fuel Data Collected Pursuant to the FPT Act and FPT Regulation

The BCUC will organize the Fuel Data collected pursuant to the FPT Act into groups based on the nature of such data (e.g., price specific data fields). The BCUC will then review the groups in light of the key principles described in Section 3.1.1 above and will determine which groups of Fuel Data constitute Protected Information.

The BCUC will maintain a list, attached as Appendix A, documenting: (i) the universe of Fuel Data the BCUC collects pursuant to the FPT Act and FPT Regulations; (ii) the groupings of Fuel Data; and (iii) which groups constitute Protected Information.

The BCUC may revise Appendix A from time to time. Any proposed revisions to Appendix A will be subject to notice and process.

3.2 Confidentiality of Protected Information

All Fuel Data determined as Protected Information in Appendix A attached hereto is confidential and shall be accorded confidential treatment by the BCUC. For additional clarity, specific requests for confidentiality over the groups of Fuel Data designated as Protected Information in Appendix A (and the individual categories of Fuel Data contained therein) are not required.

3.3 Submission Protocols for Protected Information

If a submission contains Protected Information as identified in Appendix A, a Responsible Person must submit: (i) a copy of the required BCUC form wherein any and all Protected Information is redacted; and (ii) an unredacted copy of the required BCUC form.

To submit a redacted form, “Redacted” must be inserted in all cells on the form that would otherwise contain Protected Information. An illustrative example of how to make such a redaction is shown below:

Figure 1: Unredacted Submission

British Columbia Monthly Retail Supplier Report								
Internal ID	Fuel Type	Fuel Grade	Supplier of Reportable Fuel	Shipment Volume (litres)	Shipment Date	Amounts Paid/Payable by Purchaser per Litre (\$/L)	Currency	Transaction
INT44522	Gasoline	PUL	ABC	10,000	10/2/2020	1.01	CAD	Third-Party
INT44523	Diesel	ULSD BC6	ABC	6,000	10/2/2020	1.01	CAD	Third-Party

Figure 2: Redacted Submission

British Columbia Monthly Retail Supplier Report								
Internal ID	Fuel Type	Fuel Grade	Supplier of Reportable Fuel	Shipment Volume (litres)	Shipment Date	Amounts Paid/Payable by Purchaser per Litre (\$/L)	Currency	Transaction
INT44522	Gasoline	PUL	ABC	Redacted	10/2/2020	Redacted	CAD	Third-Party
INT44523	Diesel	ULSD BC6	ABC	Redacted	10/2/2020	Redacted	CAD	Third-Party

4.0 Requests for Confidential Treatment of Non-Protected Information

The BCUC may publish any Fuel Data not determined to be Protected Information.

Should a Responsible Person wish to keep confidential any Fuel Data or other information and records submitted to the BCUC pursuant to the FPT Act that has not been determined as Protected Information in Appendix A, the BCUC's process for confidentiality requests set out in Part IV of the BCUC's Rules of Practice and Procedure shall apply.

The BCUC expects that such requests will be infrequent, but may be appropriate in certain circumstances such as when comments made as part of a Responsible Person's submission contain commercially sensitive material not previously contemplated in Appendix A or where new reporting requirements have been implemented but revisions to the list of Protected Information provided in Appendix A have yet to be determined.

Any Fuel Data that a Responsible Person requests confidentiality over pursuant to Section 4.0 of this Framework will be kept confidential on an interim basis until the BCUC renders a final determination.

5.0 Disclosure of Protected Information and Other Confidential Materials

5.1 Undertaking and Declaration Regarding Confidentiality of Protected Information

Access to Protected Information may be granted by the BCUC subject to the process outlined below.

Parties requesting access to Protected Information must submit a request electronically to the BCUC that sets out the reason(s) for the request and the period of time for which access is required, and includes a statement describing how access to the Protected Information will further the goals of the FPT Act. The BCUC shall notify Responsible Person(s) of any access requests received respecting the Responsible Person's Protected Information. A Responsible Person may object to a request for access to Protected Information by filing an objection setting out its reasons within 14 days of being notified by the BCUC.

The BCUC will render the final determination as to whether access to the Protected Information will be approved and any conditions on such approval.

If a request for access to Protected Information is approved, the BCUC will notify the requestor, copying affected Responsible Person(s). Such approval will include a description of the Protected Information to be disclosed and the deadline after which the requestor must return the Protected Information to the BCUC or destroy the Protected Information.

The requestor must sign and file with the BCUC a Declaration and Undertaking form in respect of the use of the Protected Information before receiving a copy of the Protected Information from the BCUC. The Declaration and Undertaking form is a binding commitment by the requestor: (i) to use the Protected Information disclosed exclusively for purposes described in the access request; (ii) to hold the Protected Information in confidence; (iii) to not reproduce the Protected Information disclosed; and (iv) to return the Protected Information to the BCUC or destroy the Protected Information within fourteen (14) days of the deadline established in the BCUC's approval. The BCUC may impose any other additional conditions or safeguards as it considers appropriate in the circumstances.

5.2 Public Interest

Pursuant to section 9(2)(b) of the FPT Act, the BCUC, in its role as Administrator, may publish Protected Information if the BCUC is satisfied, following a process in which the Responsible Person may participate, that

the public interest in the Protected Information that will be disclosed outweighs any potential harm to Responsible Persons, having regard, without limitation, to the importance of (i) the competitiveness of the market for reportable fuels, and (ii) public confidence in the competitiveness of that market. The BCUC will hold a hearing prior to any such disclosure and will provide notice of such a hearing to the affected parties.

When making the case for publication of Protected Information, parties may make submissions regarding factors they consider to be relevant, including but not limited to, the following:

- (a) whether the information relates to matters that the public would have a strong interest in knowing;
- (b) whether the information indicates there is a reasonable likelihood of wrongdoing; or
- (c) whether the information poses a risk of harm to individual or public safety or to the environment.

The BCUC will balance the public interest in publishing Protected Information against the potential harm to a Responsible Person that can be reasonably anticipated. The BCUC will have regard to matters that it considers relevant, including whether disclosure could reasonably be expected to result in any of the following:

- (a) Undue material financial loss or gain to a Responsible Person;
- (b) significant harm or prejudice to that Responsible Person's competitive or negotiating position; or
- (c) harm to individual or public safety or to the environment.³

6.0 Approaches for Making Protected Information Non-Confidential

6.1 Purpose

As the Administrator, the BCUC is responsible for collecting and publishing Fuel Data regarding a Reportable Activity in BC in an effort to promote competitiveness and public confidence in the competitiveness of the fuel market. To achieve this objective and to provide transparency into Fuel Data regarding a Reportable Activity in BC, the BCUC may aggregate, anonymize, or make other alterations to Protected Information to permit disclosure of Fuel Data the BCUC collects pursuant to the FPT Act and FPT Regulations. The BCUC is cognizant of the importance of maintaining an appropriate balance between transparency and the protection of Protected Information in the execution of its mandate.

The processes described below are intended to serve as a starting point to support the BCUC's Fuel Data collection and publication efforts. The BCUC expects that further refinements may be necessary as Fuel Data continues to be collected and publication plans evolve. The BCUC will seek input from Responsible Persons and other interested parties in a public process prior to implementing any alternative methods to those proposed in this Framework.

6.2 Aggregation

The BCUC may publish aggregate Protected Information, for instance average values or total counts, in instances where the BCUC has determined that aggregation will not result in the direct or indirect disclosure of the Protected Information of any one Responsible Person.

The BCUC considers that the aggregation of Protected Information submitted by no fewer than five Responsible Persons, whether the identities of the Responsible Persons are disclosed or not, is sufficient to ensure that the Protected Information of any one Responsible Person cannot be discerned (e.g., by back-calculation). For

³ These considerations are similar to those outlined in Rule 20.01 of the BCUC's Rules of Practice and Procedures.

example, the BCUC may publish total monthly wholesale fuel volumes transacted on a regional basis, so long as each reporting region contains data from at least five Responsible Persons in that month.

Such an aggregation of Protected Information is not Protected Information and cannot be provided confidential treatment.

6.3 Anonymization

The BCUC may publish anonymized Protected Information in instances where the BCUC has determined that such anonymization will not result in the direct or indirect disclosure of the identity of the Responsible Person associated.

The BCUC considers that publishing individual Fuel Data fields on a standalone basis is sufficient to ensure that the identity of any one Responsible Person cannot be discerned. For example, the BCUC may publish the Purchase Price Per Litre reported by a Responsible Person, so long as this Fuel Data is published absent any other associated information.

Such anonymized Fuel Data does not constitute Protected Information and cannot be provided confidential treatment.

6.4 Passage of Time

The BCUC recognizes the potential for a reduction in the sensitivity of Protected Information over time due to the dynamic nature of the fuel market. The BCUC considers that after a period of two years from the date of submission the sensitivity of Protected Information will have diminished such that confidential treatment is no longer warranted.

Should the BCUC consider the sensitivity of certain Protected Information to have diminished such that confidential treatment is no longer warranted after a period of less than two years, the BCUC will notify the affected Responsible Person(s) of its intention to remove the Protected Information designation over that information. Any objections must be provided to the BCUC in writing within 30 days. The BCUC will consider any timely objections prior to removal of any Protected Information designations pursuant to this section.

7.0 Reconsideration of a BCUC Decision

For the purposes of this Framework, any reference to a decision means a decision related to the determination of Protected Information.

Any decision related to the determination of Protected Information under this Framework may be reconsidered pursuant to section 99 of the UCA and Part V of the BCUC's Rules of Practice and Procedure.

Appendix A – Identification of Protected Information and the BCUC Reporting Form Fields per Group

A1. Background

The British Columbia Utilities Commission (BCUC) reporting forms allow Responsible Persons to submit required Fuel Data to the BCUC pursuant to the *Fuel Price Transparency Act* (FPT Act). The BCUC has the following reporting forms available:

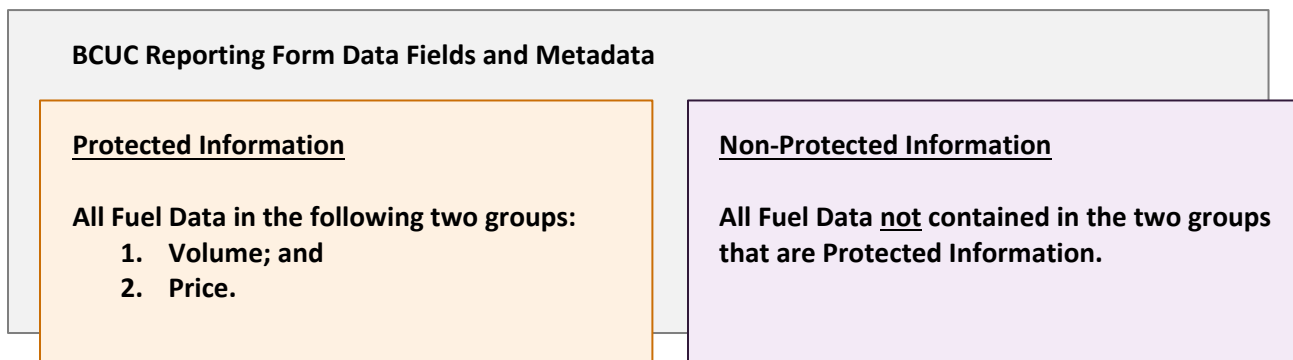
1. FPT Regulation – British Columbia Monthly Importer Report;
2. FPT Regulation – British Columbia Monthly Wholesale Purchaser Report;
3. FPT Regulation – British Columbia Monthly Low Carbon Fuel Standards (LCFS) Credit Report;
4. FPT Regulation – British Columbia Annual Storage Report;
5. FPT Regulation – British Columbia Monthly Retail Supplier Report;
6. Special Direction – British Columbia Monthly Retail Purchases Report;
7. Special Direction – British Columbia Monthly Retail Sales Report; and
8. Special Direction – Retail Station Survey.

In addition, when a Responsible Person submits a BCUC reporting form through the BCUC FPT Act Regulatory Reporting Portal (Portal), data is generated in association with the submission (i.e., metadata). Metadata, such as the submission timestamp, is also considered in this Framework.

A2. Grouping of Fuel Data

The BCUC has grouped together the individual data fields contained in the above BCUC reporting forms and all metadata based on the nature of the Fuel Data collected. In accordance with the process and principles described in section 3, above, the BCUC has identified two groups of Fuel Data as Protected Information. These groups are: (1) volume; and (2) price, as shown in Figure A1 below. The specific reporting fields included in these groups are presented in Tables A1 to A2, below. All other Fuel Data collected by the BCUC pursuant to the FPT Act is presented in Table A3, below, and does not constitute Protected Information.

Figure A1 – Grouping of BCUC Reporting Form Fields and Metadata



A3. Data Fields Contained in BCUC Groups

The data fields contained in each of the groups discussed in Section A2 are presented in Tables A1–A3.

Table A1– Volume

BCUC Reporting Form	Data Field	Protected Information
FPT Regulation – BC Monthly Importer Report	Volume (L15)	Yes
FPT Regulation – BC Monthly Wholesale Purchaser Report	Volume (L15)	Yes
FPT Regulation – BC Annual Storage Report (Terminal)	Transloading Capacity (Litres/Hour)	Yes
FPT Regulation – BC Annual Storage Report (Terminal)	Terminal Loading Capacity (Litres/Hour)	Yes
FPT Regulation – BC Annual Storage Report (Terminal)	Terminal Unloading Capacity (Litres/Hour)	Yes
FPT Regulation – BC Annual Storage Report (Tank)	Blending Capacity (Litres/Hour)	Yes
FPT Regulation – BC Annual Storage Report (Tank)	Physical Maximum Capacity (Litres)	Yes
FPT Regulation – BC Annual Storage Report (Tank)	Tank Heel Volume (Litres)	Yes
FPT Regulation – BC Annual Storage Report (Tank)	Net Useable Capacity (Litres)	Yes
FPT Regulation – BC Monthly Retail Supplier Report	Shipment Volume (Litres)	Yes
Special Direction – BC Monthly Retail Purchases Report	Shipment Volume (L15)	Yes
Special Direction – BC Monthly Retail Sales Report	Daily Volume Sold (L15)	Yes
Special Direction – Retail Station Survey	2019 Total Gasoline Sales Volume (Litres)	Yes
Special Direction – Retail Station Survey	2019 Total Diesel Sales Volume (Litres)	Yes

Table A2 – Price

BCUC Reporting Form	Data Field	Protected Information
FPT Regulation – BC Monthly Importer Report	Purchase Price per Litre	Yes
FPT Regulation – BC Monthly Importer Report	Transportation Costs per Litre	Yes
FPT Regulation – BC Monthly Wholesale Purchaser Report	Purchased Price per Litre	Yes
FPT Regulation – BC Monthly Retail Supplier Report	Amounts Paid/Payable by Purchaser per Litre (\$/L)	Yes
Special Direction – BC Monthly Retail Purchases Report	Purchase Price per Litre (\$/L)	Yes
Special Direction – BC Monthly Retail Purchases Report	Transportation Costs per Litre (\$/L)	Yes
Special Direction – BC Monthly Retail Sales Report	Volume-Weighted Selling Price (\$/L)	Yes

Table A3 – All Fuel Data Treated as Non-Protected Information

BCUC Reporting Form	Data Field	Protected Information
FPT Regulation – BC Monthly Importer Report	Internal ID	No
FPT Regulation – BC Monthly Importer Report	Fuel Type	No
FPT Regulation – BC Monthly Importer Report	Fuel Grade	No
FPT Regulation – BC Monthly Importer Report	Importer	No
FPT Regulation – BC Monthly Importer Report	Currency	No
FPT Regulation – BC Monthly Importer Report	Transaction Type	No
FPT Regulation – BC Monthly Importer Report	Reporting Period	No
FPT Regulation – BC Monthly Importer Report	Country of Origin	No
FPT Regulation – BC Monthly Importer Report	Province of Origin	No
FPT Regulation – BC Monthly Importer Report	State of Origin	No
FPT Regulation – BC Monthly Importer Report	Currency	No

FPT Regulation – BC Monthly Wholesale Purchaser Report	Internal ID	No
FPT Regulation – BC Monthly Wholesale Purchaser Report	Fuel Type	No
FPT Regulation – BC Monthly Wholesale Purchaser Report	Fuel Grade	No
FPT Regulation – BC Monthly Wholesale Purchaser Report	Name of Wholesale Purchaser	No
FPT Regulation – BC Monthly Wholesale Purchaser Report	Currency	No
FPT Regulation – BC Monthly Wholesale Purchaser Report	Transaction Type	No
FPT Regulation – BC Monthly Wholesale Purchaser Report	Transaction Date	No
FPT Regulation – BC Monthly Wholesale Purchaser Report	Seller Name	No
FPT Regulation – BC Monthly Wholesale Purchaser Report	Seller Address	No
FPT Regulation – BC Monthly LCFS Credit Report	Total Number of Transfers	No
FPT Regulation – BC Monthly LCFS Credit Report	Total Credits	No
FPT Regulation – BC Monthly LCFS Credit Report	Average Price per LCFS Credit	No
FPT Regulation – BC Annual Storage Report (Terminal)	BCUC Terminal ID	No
FPT Regulation – BC Annual Storage Report (Terminal)	Terminal Name	No
FPT Regulation – BC Annual Storage Report (Terminal)	Owner/Operator	No
FPT Regulation – BC Annual Storage Report (Terminal)	Address	No
FPT Regulation – BC Annual Storage Report (Tank)	BCUC Terminal ID	No
FPT Regulation – BC Annual Storage Report (Tank)	Terminal Name	No
FPT Regulation – BC Annual Storage Report (Tank)	BCUC Tank ID	No
FPT Regulation – BC Annual Storage Report (Tank)	Tank Name	No
FPT Regulation – BC Annual Storage Report (Tank)	Fuel Type	No
FPT Regulation – BC Annual Storage Report (Tank)	Fuel Grade	No
FPT Regulation – BC Monthly Retail Supplier Report	Internal ID	No
FPT Regulation – BC Monthly Retail Supplier Report	Fuel Type	No
FPT Regulation – BC Monthly Retail Supplier Report	Fuel Grade	No
FPT Regulation – BC Monthly Retail Supplier Report	Supplier of Reportable Fuel	No
FPT Regulation – BC Monthly Retail Supplier Report	Shipment Date	No
FPT Regulation – BC Monthly Retail Supplier Report	Currency	No
FPT Regulation – BC Monthly Retail Supplier Report	Transaction Type	No
Special Direction – BC Monthly Retail Purchases Report	BCUC Retail Station ID	No
Special Direction – BC Monthly Retail Purchases Report	Retail Station Name	No
Special Direction – BC Monthly Retail Purchases Report	Retail Station Address	No
Special Direction – BC Monthly Retail Purchases Report	Internal ID	No
Special Direction – BC Monthly Retail Purchases Report	Fuel Type	No
Special Direction – BC Monthly Retail Purchases Report	Fuel Grade	No
Special Direction – BC Monthly Retail Purchases Report	Shipment Date	No
Special Direction – BC Monthly Retail Purchases Report	Currency	No
Special Direction – BC Monthly Retail Purchases Report	Transaction Type	No
Special Direction – BC Monthly Retail Purchases Report	Purchase Price includes Transportation Costs	No
Special Direction – BC Monthly Retail Purchases Report	Currency	No
Special Direction – BC Monthly Retail Purchases Report	Seller Name	No
Special Direction – BC Monthly Retail Purchases Report	Seller Address	No
Special Direction – BC Monthly Retail Purchases Report	Supply Location	No
Special Direction – BC Monthly Retail Sales Report	BCUC Retail Station ID	No
Special Direction – BC Monthly Retail Sales Report	Fuel Type	No
Special Direction – BC Monthly Retail Sales Report	Fuel Grade	No
Special Direction – BC Monthly Retail Sales Report	Retail Station Name	No
Special Direction – BC Monthly Retail Sales Report	Retail Station Address	No
Special Direction – BC Monthly Retail Sales Report	Date of Sale	No
Special Direction – BC Monthly Retail Sales Report	Taxes per Litre (\$/L)	No
Special Direction – BC Monthly Retail Sales Report	Daily High Price (\$/L)	No
Special Direction – BC Monthly Retail Sales Report	Daily Low Price (\$/L)	No
Special Direction – BC Monthly Retail Sales Report	Time of Daily High Price (hh:mm)	No

Special Direction – BC Monthly Retail Sales Report	Time of Daily Low Price (hh:mm)	No
Special Direction – Retail Station Survey (Web Form)	Responsible Person Name	No
Special Direction – Retail Station Survey (Web Form)	Responsible Person Address	No
Special Direction – Retail Station Survey (Web Form)	Responsible Person Phone	No
Special Direction – Retail Station Survey (Web Form)	Responsible Person Email	No
Special Direction – Retail Station Survey (Web Form)	Representative Name	No
Special Direction – Retail Station Survey (Web Form)	Representative Position	No
Special Direction – Retail Station Survey	Retail Station Internal ID / Name	No
Special Direction – Retail Station Survey	Retail Station Address 1	No
Special Direction – Retail Station Survey	Retail Station Address 2	No
Special Direction – Retail Station Survey	Retail Station City	No
Special Direction – Retail Station Survey	Retail Station Province	No
Special Direction – Retail Station Survey	Retail Station Postal Code	No
Special Direction – Retail Station Survey	Brand of Fuel	No
Special Direction – Retail Station Survey	Ownership Structure	No
Special Direction – Retail Station Survey	Pump Service	No
Special Direction – Retail Station Survey	Regular Gasoline (Grade)	No
Special Direction – Retail Station Survey	Midgrade Gasoline (Grade)	No
Special Direction – Retail Station Survey	Premium Gasoline (Grade)	No
Special Direction – Retail Station Survey	Diesel	No
Special Direction – Retail Station Survey	Premium Diesel	No
Special Direction – Retail Station Survey	Open 24 Hours	No
Special Direction – Retail Station Survey	Loyalty Program	No
Special Direction – Retail Station Survey	Convenience Store	No
Special Direction – Retail Station Survey	Restaurant / Quick-Service Restaurant	No
Special Direction – Retail Station Survey	Supermarket / General Store	No
Special Direction – Retail Station Survey	Automotive Repair Service Bay	No
Special Direction – Retail Station Survey	Car Wash	No
Special Direction – Retail Station Survey	Electric Vehicle Charging Station	No
Special Direction – Retail Station Survey	Other (Comments)	No
FPT Act Regulatory Reporting Portal - Metadata	Title – file description selected by Responsible Person	No
FPT Act Regulatory Reporting Portal - Metadata	Report Type – reporting form type selected by Responsible Person	No
FPT Act Regulatory Reporting Portal - Metadata	Month – reporting period selected by Responsible Person	No
FPT Act Regulatory Reporting Portal - Metadata	Year – reporting period year selected by Responsible Person	No
FPT Act Regulatory Reporting Portal - Metadata	Report Category – redacted, unredacted, confidentiality request etc., selected by Responsible Person	No
FPT Act Regulatory Reporting Portal - Metadata	Comments – comment text input by Responsible Person	No
FPT Act Regulatory Reporting Portal - Metadata	Submission ID – unique numeric submission ID generated by Portal	No
FPT Act Regulatory Reporting Portal - Metadata	Original Submission ID – unique numeric submission ID generated by Portal	No
FPT Act Regulatory Reporting Portal - Metadata	Submission Type – new submission, resubmission etc., generated by Portal	No
FPT Act Regulatory Reporting Portal - Metadata	Company – name of Responsible Person generated by Portal	No
FPT Act Regulatory Reporting Portal - Metadata	Archived File URL – internal file path generated by Portal	No
FPT Act Regulatory Reporting Portal - Metadata	Submission Time – submission timestamp generated by Portal	No

FPT Act Regulatory Reporting Portal - Metadata	Report Status – internal tracking for accepted, under review etc., generated by Portal	No
FPT Act Regulatory Reporting Portal - Metadata	Item Type – internal data organization to create an item list of submissions, generated by Portal	No
FPT Act Regulatory Reporting Portal - Metadata	Path – internal file path generated by Portal	No

DRAFT