



Gordon Doyle  
Vice President, Regulatory Affairs, Legal & Gas Supply

Pacific Northern Gas Ltd.  
750 – 888 Dunsmuir Street  
Vancouver, BC V6C 3K4  
Tel: (604) 691-5684  
Fax: (604) 697-6210  
Email: gdoyle@png.ca

Via E-File

April 29, 2021

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

File No.: 4.2.7 (2021)

Attention: Patrick Wruck  
Commission Secretary

Dear Mr. Wruck:

**Re: Pacific Northern Gas Ltd.  
British Columbia Utilities Commission – Inquiry into the Regulation of Safety  
Submission on Proposed Stage 1 Sub Issues**

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Pacific Northern Gas Ltd. (PNG) writes in response to British Columbia Utilities Commission (BCUC) Order G-34-21, which established a further regulatory timetable for the referenced Inquiry, and to the BCUC's letter of March 25, 2021, which provided proposed Stage 1 sub issues for intervenor comments (Exhibit A-7).

On the matter of the proposed Stage 1 sub issues provided in Appendix A to Exhibit A-7, PNG notes that it was provided an opportunity to review a draft of the FortisBC submission filed on April 29, 2021 (Exhibit C4-3). PNG agrees with FortisBC that, in general, sub issues 1, 2, 4, 5 and 6 are appropriately addressed in Stage 1 while sub issue 3, Safety in BCUC Adjudications, is more appropriately considered following Stage 1 and in consideration of the scope of the BCUC's jurisdiction to regulate safety.

PNG also agrees with FortisBC's identification of questions in sub issues 1, 4 and 6 that would be better addressed in Stage 2 of the proceeding as they are related to implementation issues and would benefit from a clear understanding of the BCUC's jurisdiction, principles and framework related to the regulation of safety for utilities that will be determined as part of Stage 1 of the Inquiry.

Please direct any further questions on this matter to my attention.

Yours truly,

*Original on file signed by:*

Gordon Doyle