

VIA ELECTRONIC FILING

September 24, 2020

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

Attention: Marija Tresoglavic; Acting Commission Secretary
Commission.Secretary@bcuc.com

Dear Ms. Tresoglavic:

Re: Trans Mountain Comments on Reporting Requirements of the Fuel Price Transparency Regulation – Industry Engagement and Consultation

Trans Mountain Pipeline ULC on behalf of Trans Mountain Pipeline L.P. (collectively, Trans Mountain) is in receipt of the British Columbia Utilities Commission (BCUC) Letter dated September 9, 2020 seeking feedback from importers, wholesalers, terminal operators, and supplier of retail dealers on the Fuel Price Transparency Regulation, B.C. Reg. 52/2020 - Draft Reporting Guidelines (Guidelines).

Trans Mountain has reviewed the Guidelines and associated legislation and for reasons provided below does not meet the Reporting Requirements of the Fuel Price Transparency Regulations outlined in Order in Council No. 474/20.

The Trans Mountain Pipeline is a federally regulated, common carrier pipeline that transports crude oil and refined petroleum products (including gasoline and diesel) from Edmonton, Alberta to British Columbia and Washington State. The rules of the transportation service provided by Trans Mountain are governed by its tariff that is regulated by the Canada Energy Regulator (CER).

Trans Mountain is not a refiner, processor, wholesaler or retailer of refined petroleum products or crude oil as defined in the *Fuel Transparency Act*. In addition, Trans Mountain does not own the crude oil or petroleum products that it transports through its pipeline and thus has no control or visibility of the pricing information of these fuels.

Furthermore, while Trans Mountain transports reportable fuel on its pipeline, Trans Mountain transports these reportable fuels directly to third-party product terminals in Burnaby and Kamloops. Therefore, Trans Mountain does not store reportable fuels at its terminals in British Columbia as required by the *Fuel Transparency Act* and Regulation. Trans Mountain uses its terminals in British Columbia for operational and logistics purposes only.

Trans Mountain appreciates the opportunity to provide comments on the Guidelines. As the Guidelines do not apply to our circumstance, Trans Mountain has no additional comments.

Sincerely,

Original signed by

Dorothy Golosinski,
Director, Regulatory