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Sent: Friday, September 25, 2020 5:00 PM
To: Commission, Secretary
Subject: Comments on Draft Reporting Guidelines for Fuel Transparency Regulations

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In response to my recent attendance at one the BCUC Information Sessions for the Draft Reporting Guidelines for the Fuel Transparency Regulations, I would like to submit the following comments:

- It would be best to start with definitions and examples of what, exactly, “Reportable Fuel” is. This was the first question I had when I began reading all of the correspondence I have received, as well as the pages I have read on GasPricesBC.ca website, I cannot find a definition or distinction of what “Reportable” fuel is. In addition, I feel an explanation of the distinction between fuel, reportable fuel, and/or unreportable fuel needs to be out front, with examples. Perhaps these definitions should be clearly stated on the forms somewhere or in a guide book accompanying the forms. I still haven’t found a definition, my final attempt will be the read the actual legislation as a last resort.
- I am still confused as the level detail that each form requires. If each transaction requires a separate line, then these submissions will extremely large.
- Does reported price on the form include taxes? Our pricing in our accounting system is with all taxes included. Do we report pricing, tax in or tax out?
- I believe there is a need for better descriptions of what type of transactions are reported on each form, with examples. Most businesses are purchasers and suppliers of fuel. More direction on completing these forms is needed.
- A detailed Guide on how to complete the forms is needed. I have read the forms on GasPricesBC, I believe I know what information is being asked to report but there exists enough doubt that I would not be comfortable submitting the forms without additional effort to confirm. If I have to make a phone call to a department, then I feel my time is wasted and I may begin to feel disgruntled.
- Pertaining to the Fuel Storage Form, as a cardlock facility we rent/lease our storage tanks. We are an operator, our Lessor is the Owner, the form asks for Owner/Operator to report. Who will be responsible for this reporting. Again, much more clarification is needed.
- Privacy is a serious consideration for us. We are a business operating in a rural, small city location. For smaller markets like ours, disclosure of the pricing practices, which can include many variables such as freight and labour, can be hard to explain to the general citizen, yet they still have to be included in the overall product price. However, when this information but made available to our competitors, the likelihood of harming our business greatly outweighs any benefit to the general public, in my opinion.
- Will the public have access to our company name, how detailed will this information be? Will they be able to see our suppliers? And pricing from our Suppliers? It appears that our proprietary practices may be made available to our competitors through this process, over and above the pricing data. Rack pricing is available to all.

- What format will the publicized data be in? How detailed will it be? Do you have examples?
- The strength of the security for data protection are a grave concern. Governments sites are security breached far too often.
- What will the penalties be for non-compliance in reporting. I have only read mention that there will be penalties but no mention of what the penalties are.

Thank you for considering the above comments. I believe that as we get closer to the November deadline, that more issues and concerns will arise.

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