



Prince George Refinery
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September 25, 2020

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

Attn: Commission Secretary

Tidewater Midstream would like to provide the following feedback regarding the proposed wholesale industry reporting requirements for the Fuel Price Transparency Act.

As previously expressed in our comments to the BC Ministry of Energy, Mines and Petroleum Resources, Tidewater has significant concerns with reporting commercially confidential information. The reporting regulations being proposed would require Tidewater to report detailed information on fuel imports, wholesale purchases, fuel terminals and tank capacities. Tidewater has several specific concerns with the reports as currently proposed, including the following:

1. The import template currently requires reporting the identity of the province of supply for product originating in Canada. The refining industry is very small in Canada, with some provinces only having one or two refineries. By requiring the reporting of the province of supply, the source of supply may also be able to be determined. Tidewater would request that only the country of supply be reported for imports to BC.
2. The wholesale reporting is to be completed by the fuel buyer, however it requires the reporting of the name of the seller. This would lead to information being released without the seller having the opportunity to request confidentiality. Tidewater is requesting that seller information be removed from the wholesale reporting form, similar to the import reporting form.
3. The reporting guidelines do not provide sufficient clarity of reporting obligations. For example, in the information sessions it was presented that reportable fuel sold at a cardlock, bulk storage terminal or terminal rack would be excluded from FPT reporting, however this is not stated anywhere in the guidelines. As a significant portion of fuel in BC is sold from these locations this reporting exclusion needs further clarification.

Thank you for the opportunity for Tidewater Midstream to provide comments on the proposed wholesale industry reporting requirements of the BC Fuel Price Transparency Act. Please do not hesitate to contact me if you have any further questions about the comments provided.

Regards,

A handwritten signature in black ink that reads "Matt Millard". The signature is written in a cursive, flowing style.

Matt Millard
General Manager, Prince George Refinery
Tidewater Midstream and Infrastructure Ltd.