

## Federated Co-operatives Limited

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October 8, 2020

British Columbia Utilities Commission

VIA EMAIL: [Commission.Secretary@bcuc.com](mailto:Commission.Secretary@bcuc.com)

Dear Commission Secretary,

### **Re: Fuel Price Transparency Act – Retail Data Collection Pilot – Written Submission**

On behalf of Federated Co-operatives Limited (FCL), thank you for the opportunity to provide our feedback on the Pilot Sampling Methodology and Retail Draft Reporting Guidelines. We remain committed to collaborate with the British Columbia Utilities Commission (BCUC) on the retail data collection pilot.

We understand the Special Direction given to BCUC is to conduct a retail pilot targeted at the retail component of the fuel supply chain in British Columbia. The pilot requires our retailers to participate in surveys, data collection, and monthly report submissions before November 16, 2020. This will cause an administrative burden on those required to take part within the strict timelines given. Compounding our concern about the pilot, is the requirement to provide competitively sensitive data that will be compiled and reported. We respectfully request that our data be kept confidential during all phases of this pilot.

It should be noted that FCL has recommended the Province exclude those who hold a small market share in British Columbia. The Co-op brand holds four per cent market share in the province, and as such, we do not move or influence pricing in the fuel value chain. The collection and publication of data from small market players will not support the intent of the Act. We intend to further advocate for Co-op to be excluded from the Fuel Price Transparency Regulations.

Thank you again for the opportunity to comment on the proposed Pilot Sampling Methodology and Retail Draft Reporting Guidelines. If you have any questions or concerns related to this submission, please do not hesitate to contact us. Contact Tanya Hornung, Government Relations Manager at [Tanya.Hornung@fcl.crs](mailto:Tanya.Hornung@fcl.crs).

Sincerely,

A handwritten signature in black ink, appearing to read "BH", followed by a horizontal line extending to the right.

BRIAN HUMPHREYS, VICE-PRESIDENT ENERGY