



Suncor Energy Products Partnership

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February 12, 2021

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

**RE: Reporting Requirements of the Fuel Price Transparency Regulation – Draft Reporting Guidelines Version 2.0**

Dear Commission Secretary,

Per the request of your letter dated January 27, 2021, here are Suncor Energy Products Partnership's written comments in response to the BCUC's planned Draft Guidelines v.2 and Draft Forms v.2.

**Fuel Grades**

- Suncor supports the additional fuel grades in the "Key" within the Draft Forms v.2, particularly to allow responsible persons to categorize the imports of motor gasoline blending components, such as Conventional, as this is consistent with our feedback on V.1 of the BCUC guidelines.
- Suncor requests the addition of Ethanol, Hydrotreated Renewable Diesel (HRD) and FAME Biodiesel (Fatty Acid Methyl Esters) to the fuel grades "Key" since they are also significant blending components of finished fuel products sold in the province of BC (as required by regulation), their volumes and costs are currently excluded from import and purchase reports, and they are therefore not currently considered in BCUC's cost analysis.

**Importer Report**

- For pipeline shipments, Suncor requests reporting be based on "receipt of delivery" rather than "injection of product" as data captured at the pipeline injection point is aggregated and the final destination of the product can be any one of a number of Suncor's terminals in British Columbia, or can relate to a transfer to a 3rd party. In other words, there is no precise way for Suncor to report on final destination of product imported by pipeline if the BCUC requires data reporting at the pipeline injection point.
- Per our previous comments in response to Draft Guidelines v.1 and Draft Forms v.1, Suncor reminds the BCUC that all transportation costs reported for Rail and Truck movements are on a "statistical freight" costs basis rather than unique invoiced amounts for each individual delivery.



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### Mode of Transport and Delivery & Supply Location(s)

- Changes proposed in Draft Guidelines v.2 and Draft Forms v.2. will no longer allow Suncor to report significant transportation costs incurred when moving product between terminals located in BC. As an example, Suncor receives imports and purchases of fuel products at its Burrard Terminal, and then transfers a portion of these products to its terminal in Nanaimo by marine vessel. These product transfers incur significant costs but are not unique imports or purchases as the product was previously received at Suncor's Burrard Terminal and reported as such. Suncor requests that the BCUC alter its reporting guidelines and forms to allow these costs to be recorded so that BCUC's analysis and reporting will accurately represent these significant costs.
- Per our previous comments in response to Draft Guidelines v.1 and Draft Forms v.1, Suncor reminds the BCUC that current and proposed reporting requirements to not consider or capture other significant costs related to the receipt, storage and delivery of fuel within the province. These include the cost of purchasing and blending additives into finished products; terminal and storage costs including overhead; complex throughput agreements; transportation of product between terminals due to operational upsets; provisions for take or pay commitments; rail lease costs; and other unique cost elements.

### Other Considerations

- Per Suncor's letter to the BCUC on September 25, 2020, Suncor maintains its position that the requirement for wholesale purchasers to report the "Price of LCFS Credit" is ill conceived and does not reflect the cost of compliance to BC's Low Carbon Fuel Standard. Fuel suppliers meet their LCFS obligations via a number of different compliance pathways with varying costs, which the "Price of LCFS Credit" may not accurately or consistently represent.
- As a purchaser and seller of fuel in British Columbia, Suncor's purchase and sales transactions may be subject to rebates, corrections and other adjustments that are independent of volume and that cannot be tied to a previously reported transaction. Per Suncor's letter to the BCUC on September 25, 2020, we reiterate the need to report these adjustments as a total \$ amount, rather than a \$ per litre amount, and without specifying a volume for a transaction if it cannot be reconciled to the rebate, adjustment, etc.

Should you have any questions regarding these comments, please do not hesitate to contact us.

Sincerely,

James McLean  
Director National Pricing  
Suncor Energy Products Partnership



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