

TO: CITY CLERK OF VICTORIA
RE: SHORT TERM RENTAL BUSINESS LICENCE APPEAL
2-1140 ARTHUR CURRIE LANE, VICTORIA, BC

Written Submission of Susan Strangway, Owner/Applicant

1. This submission relates to my appeal of a decision of a City of Victoria Licence Inspector to refuse to renew my short-term rental ("STR") business licence for my principal residence located at 2-1140 Arthur Currie Lane.
2. In a letter dated February 18, 2025 (the "Refusal Letter"), the Bylaw and Licensing Services Department of the City of Victoria improperly denied my 2025 STR licence renewal application ostensibly on the basis that the application had failed to establish that unit 2-1140 Arthur Currie Lane is my principal residence, to the satisfaction of the Licence Inspector. See attached Refusal Letter.
3. The Refusal Letter references Section 4 of the *Short-Term Rental Regulation Bylaw*, as follows:
 - (4) *The Licence Inspector may refuse to issue a licence for a short-term rental if, in the opinion of the Licence Inspector,*
 - (a) *the applicant has failed to comply with section 3; or*
 - (b) *the short-term rental operation would contravene a City bylaw or another enactment.*

The parentheses surrounding the number "4" are not part of the bylaw but were incorrectly included in the citation of this section in the Refusal Letter.

4. The Refusal Letter makes no reference to any concerns relating to Section 4(b), which is notable given that the City conducted two separate inspections of my property. The first was on January 20, 2025, during which Bylaw and Licensing Services Department inspected my premises at 2-1140 Arthur Currie Lane. This resulted in a letter dated January 28, 2025, in which Bylaw and Licensing Services advised me that my license had not been approved as the inspection had revealed that "work may have been done on [my] property without permit", and intimating that my property might be "unsafe" as a result. As such, the City, referring to and relying on Section 16(5)(b) of the Community Charter, requested an additional inspection "of all spaces at 1140 Arthur Currie Lane". I have attached a copy of this letter for reference. The letter does not provide any details or specifics of anything found during the inspection that "revealed that work may have been done on [my] property without permit" or to support the required reasons for entry under Section

16(5)(b) of the Community Charter. All prior inspections relating to my STR applications for previous years (2022, 2023 and 2024) have been limited to Suite 2 at 1140 Arthur Currie Lane. The January 28, 2025, letter does not refer to any concerns relating to Section 4(a), nor were any concerns relating to that section (and by implication Section 3) mentioned by the City's personnel at any time during the January 20, 2025, inspection.

5. On February 10, 2025, Bylaw and Licensing Services Department inspected my premises for a second time, ostensibly for the purposes of determining if any unpermitted work had been done, though it was unclear to me whether that referred to work by a prior owner or to work they believed had been done since I became the owner in May of 2022 (or both). This inspection covered the entire property at 1140 Arthur Currie Lane, including an outbuilding, rather than just Suite 2 and, as mentioned, was purportedly conducted under the authority of Section 16(5)(b) of the Community Charter. Section 16(5)(b) of the Community Charter requires 24 hours notice of entry on private property and the reasons for such entry. The only reasons set out in the City's January 28, 2025, were related to non-specific suspected unpermitted work.
6. Having made no reference to any concerns relating to Section 4(b), such as the suspected unpermitted work referred to in the City's January 28, 2025, letter, the Refusal Letter goes on to reference Section 3(2)(e) of the Short-Term Rental Regulation Bylaw in the following inaccurate manner:

3(2) *A person applying for the issuance of a licence to operate a short-term rental must, in addition to meeting the requirements of the Business Licence Bylaw:*

(e) *provide (sic), in the form satisfactory to the Licence Inspector, that the premises where the short-term rental will be operated are the operator's principal residence.*

The version of Section 3(2)(e) set out in the Refusal Letter inexplicably excludes the word "evidence" after the word "provide", as set out in the *Short-Term Rental Regulation Bylaw, Amendment Bylaw (No. 1)*.

7. The exclusion of the word "evidence" from the version of Section 3(2)(e) set out in the Refusal Letter is notable. The City's own webpage regarding Short-Term Rentals (<https://www.victoria.ca/building-business/business-licensing/short-term-rentals>) includes the following Frequently Asked Question: "*What kind of proof of residence documentation is required for my application?*". The City has provided the following response: "*You will need to provide government issued ID which states your address, a home or rental insurance policy and a utility bill. All documentation must be current and valid.*" This statement appears to be referable to Section 3(2)(e) in that it outlines

both the “evidence” contemplated by that section and the “form” of that evidence that is presumably “satisfactory to the Licence Inspector”, namely, government issued ID which states your address, a home or rental insurance policy and a utility bill, all of which must be current and valid. I have included a copy of the City’s webpage.

8. I own all of 1140 Arthur Currie Lane and my principal residence is unit 2 at this address. This is evidenced by the application and the required supporting documents I submitted with it on January 2, 2025, including a copy of my BC driver’s license showing my address as “2-1140 Arthur Currie Lane”, a BC Hydro bill showing my name and my address of “2-1140 Arthur Currie Lane” and a confirmation of property insurance coverage showing my name and my address as “2-1140 Arthur Currie Lane”, all of which documentation was current and valid. Attached is a copy of my STR application as well as the three documents showing proof of residence as required by the application form and as contemplated in the City’s answer to the noted Frequently Asked Questions on its website.
9. The Refusal Letter does not provide any reasons to indicate that the evidence I provided with my application did not comply with the application requirements or as contemplated in the City’s answer to the noted Frequently Asked Questions on its own website. Instead, the Refusal Letter cites 6 vague “inconsistencies” which the Licensing Inspector apparently believes indicate that Suite 2 is not my principal residence, but without reference to any details, specifics or documentation. Further, the Licensing Inspector has not provided any explanation for how the items they have allegedly reviewed and relied on have been interpreted by them as “indicating” that 2-1140 Arthur Currie Lane is not my principal residence. Among other surrounding circumstances, the relevant effective dates for the items allegedly reviewed will likely be important factors for determining what, if any, conclusions can safely be drawn from them.
10. While Section 4 may provide that “the Licence Inspector may refuse to issue a licence for a short-term rental if, in the opinion of the Licence Inspector, the applicant has failed to comply with section 3”, such “opinion” must be reasonable and must have been arrived at reasonably on the basis of only relevant evidence. In addition, it is my respectful submission that any refusal to issue an STR licence as a result of the Licence Inspector having formed such an “opinion” should be supported by appropriate reasons. I have attached a copy of a publication of the Office of the Ombudsperson for British Columbia entitled “Quick Tips – The Reasons for Reasons” in support of this submission. The Refusal Letter falls woefully short of the recommended content of goods reasons, particularly with respect to the items

“Facts, information and evidence considered” and “Analysis”, two of the most important components of “good reasons”. As noted in this publication, proper reasons are an integral part of fair decision-making.

11. As a result of the failure of the Refusal Letter to provide any meaningful “facts, information and evidence” or “analysis” the decision set out in the Refusal Letter can only be described as “unfair”. Merely citing the **categories** of facts, evidence and information without providing any details, specifics or documentation is clearly insufficient. Any “opinion” formed by the Licence Inspector on the basis of facts, evidence and information for which no details, specifics or documentation have been provided, and where no opportunity to respond and provide supporting documentation has been afforded, while completely ignoring the very evidence required by the STR application form and the City’s own website cannot be viewed as “reasonable”. Furthermore, the Refusal Letter makes a vague reference to the “results” of the inspection of February 10, 2025, which, as previously noted, was ostensibly for the purposes of determining if there were any concerns relevant to Section 4(b) arising from the first inspection on January 20, 2025. The Refusal Letter makes no reference to the January 20, 2025, inspection. I would like to believe that the City and, in particular, the City Council, have a keen interest in ensuring that its policies and bylaws, including the decisions and exercises of discretion relating to them, are, and are seen by the public to be, fair and reasonable and not arbitrary or capricious. The Refusal Letter and the circumstances leading up to it tend to suggest the latter.
12. In the result, it is my respectful submission that, as the Refusal Letter fails to disclose any relevant evidence upon which a refusal can be reasonably based, appears to be based, at least in part, on evidence relating to an inspection conducted under the authority of Section 16(5)(b) of the Community Charter for suspected unpermitted work and for no other stated purpose, and ignores the relevant and compliant evidence and documentation I submitted with my application, the decision of the Licence Inspector to refuse my STR business license renewal application cannot be sustained and must be reversed. Accordingly, I respectfully submit that my appeal should be allowed.



1 CENTENNIAL SQUARE, VICTORIA, BC V8W 1P6 | victoria.ca

Bylaw Services

1 Centennial Square, Victoria, BC V8W 1P6
bylawservices@victoria.ca | 250.361.0215

February 18, 2025

SUSAN STRANGWAY
2-1140 ARTHUR CURRIE LANE
VICTORIA, BC V9A 7H3

RE: 2-1140 ARTHUR CURRIE LANE

The City has completed a review of your 2025 short-term rental licence application for the property located at 2-1140 Arthur Currie Lane.

The Short-Term Rental Regulation Bylaw states:

(4) The Licence Inspector may refuse to issue a licence for a short-term rental if, in the opinion of the Licence Inspector,

(a) the applicant has failed to comply with section 3; or

(b) the short-term rental operation would contravene a City bylaw or another enactment.

The application has failed to establish 2-1140 Arthur Currie Lane as your principal residence, to the satisfaction of the Licence Inspector. The Short-Term Rental Regulation Bylaw states:

3(2) A person applying for the issuance of a licence to operate a short-term rental must, in addition to meeting the requirements of the Business Licence Bylaw:

(e) provide, in the form satisfactory to the Licence Inspector, that the premises where the short-term rental will be operated are the operator's principal residence.

Your 2025 application was reviewed on February 18, 2025, including your current advertisement, open-source data, and results of the inspection on February 10, 2025. The review revealed inconsistencies, including few personal effects in the unit upon the February 10, 2025, inspection, information from the BC Provincial Portal, internal records, and other open-source data indicating 2-1140 Arthur Currie Lane is not your principal residence. As a principal resident short-term rental licence requires the premise to be the operator's principal residence, and the onus falls solely to the applicant to prove eligibility, the licence was denied.

For more information on the Short-Term Rental Regulation Bylaw and Schedule D and home based business licences, please visit: [SHORT-TERM RENTAL REGULATION BYLAW](#) and [Schedule D.pdf](#) ([victoria.ca](#)).

The City of Victoria is located on the homelands of the Songhees Nation and the Xwsepsum Nation.

Through the regulation requirements for business licensing under the *Community Charter* and the *Short-Term Rental Business Licence Appeal Process Policy*, you may request to have an appeal go before Council. The request to appeal can be made within 30 days of the date on this letter. Should you wish to pursue an appeal, the Licence Inspector report will provide all relevant information and regulations used in decision.

As per policy and procedure, our department does not respond directly to appellants regarding appeals. The appeal process is managed by Legislative Services through the City Clerk's office. All communication is passed through the City Clerk in Legislative Services, they oversee the process and will ensure all necessary information is provided to you.

For any further inquiries regarding an appeal, including acknowledgment of emails and updates, please contact Legislative Services directly at LegislativeServices@victoria.ca.

If you have any questions regarding short-term rentals or business licensing options, please contact our office by phone at 250.361.0726, or by email at str@victoria.ca.

Regards,

Bylaw & Licensing Services
Bylaw Department
City of Victoria
1 Centennial Square, Victoria B.C. V8W 1P6



1 CENTENNIAL SQUARE, VICTORIA, BC V8W 1P6 | victoria.ca

Bylaw Services

1 Centennial Square, Victoria, BC V8W 1P6
bylawservices@victoria.ca | 250.361.0215

January 28, 2025

SUSAN STRANGWAY
1140 ARTHUR CURRIE LANE
VICTORIA BC V9A 7H3

RE: 2-1140 ARTHUR CURRIE LANE

The City has completed a review of your 2025 short-term rental licence application for the property located at 2-1140 Arthur Currie Lane.

After reviewing the application and results of the inspection on January 20, 2025, your 2025 application for a short-term rental licence cannot be approved. The licensing inspection revealed that work may have been done on your property without permit.

Completing work and/or changing the occupancy of a structure without the required building, plumbing, and/or electrical permit is a violation of the City of Victoria bylaws and potentially unsafe.

The City of Victoria expects everyone to comply with its bylaws so you will be required to make an application for permits and take whatever steps are necessary to bring this property into compliance. Per Section 16(5)(b) of the *Community Charter*, our department is requesting an additional inspection of all spaces at 1140 Arthur Currie Lane.

Once the secondary inspection is complete and all unpermitted work has been resolved, you may contact our office to continue pursuing a short-term rental licence.

If you have any questions regarding the information above, please contact our office by phone at 250.361.0726, or by email at str@victoria.ca.

Regards,

Bylaw & Licensing Services Department
City of Victoria
1 Centennial Square, Victoria B.C. V8W 1P6

What are short-term rentals?



Do I need to comply with both provincial and City of Victoria regulations?



Will the new regulations from the Province impact the legal non-conforming status of my short-term rental?



What kind of proof of residence documentation is required for my application?



You will need to provide government issued ID which states your address, a home or rental insurance policy and a utility bill. All documentation must be current and valid.

I have a 2024 short-term rental licence. Do I have to reapply to operate in 2025?



Yes, short-term rental licenses must be applied for annually. All 2024 Short-Term Rental Licenses will expire on January 15, 2025.

To continue advertising or operating a short-term rental you must apply for, receive approval and pay your 2025 licence fee before January 15, 2025.

Why do I need to apply for a licence every year and is there anything I can do to help with this process?



Applications are applied for and reviewed annually to ensure eligibility and compliance. A streamlined application process will take effect in 2025 for licensees that have been approved in past years.

To avoid delays, it is recommended to apply early and submit a complete package (all

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Bylaw and Licensing Services Department
1 Centennial Square
Victoria, BC V8W 1P6

str@victoria.ca
victoria.ca/str

2025 Short-Term Rental Business Licence Application

Limited/Incorporated Company Information (if selected)

Incorporation number: _____

Have you included your Incorporation and Notice of Articles documents?

- ☐ Yes
- ☐ No, I authorize the City of Victoria to obtain the documents of Incorporation and Notice of Articles and acknowledge that a \$30 fee plus applicable taxes will be charged by the City of Victoria for this service [Administrative Fees Bylaw No. 04-40].

Please note, documents must be provided with submission. Any documents provided historically will not be considered.

*Applicant Contact

Phone number: _____ Email: _____

*Business Plan and Required Documents

Principal Residence Requirement - If eligible, you may use your principal dwelling unit for the following purposes per Schedule D - Home Occupations. Select all business plans that apply:

- ☒ Offering whole home, while you are away ☒ Offering up to two bedrooms with shared living spaces, while you are home

Please attach the following documents for proof of residence. All documents must be current, valid, not folded and easy to read.

- Government issued ID which states your address (e.g., driver's licence, BC Services Card)
- Home or rental insurance policy (stating property address, mailing address and policy holder)
- Utility bill (stating billing period, service address and mailing address)

*Designated Responsible Person

If managed by an agency, the designated responsible person can be a representative from this agency.

When an operator is not available, the designated responsible person serves as the primary contact for the short-term rental (a person who, at all times that the short-term rental is operated, has access to the premises and has the authority to make decisions in relation to the premises and the rental agreement). The responsible person must be able to attend the short-term rental premises within two hours of being requested to do so.

Relationship to Operator: _____

Name: Brodie Forrest Email: _____

Address: _____ Phone number: _____

- ☒ The above Designated Responsible Person has consented to the use of their contact information.



Bylaw and Licensing Services Department
1 Centennial Square
Victoria, BC V8W 1P6

str@victoria.ca
victoria.ca/str

2025 Short-Term Rental Business Licence Application

*Business Plan and Required Documents Continued

Host name (the profile and/or name used to offer the short-term rental): Barbie

Relationship to applicant (if not the same person): _____

Do you have another person, property manager or service company that participates in your short-term rental business? (this may include but not be limited to advertisement, management of bookings and communications with guests)

☒ No, only those declared as applicants will participate in the business

☐ Yes

If yes, please complete the information below

Select all that apply:

☐ Property manager or management company

☐ Family member

☐ Cleaning service

☐ Other _____

Property Manager or Management Company

Name of management company: _____

Name of property manager or main contact: _____

Phone number: _____ Email: _____

Business address: _____

Licence number: _____ Issuing municipality: _____

If the issuing municipality is not the City of Victoria, is it:

☐ Inter-municipal

☐ Inter-community

Cleaning Service or Other Business

Name of company: _____

Name of main contact: _____

Phone number: _____ Email: _____

Business address: _____

Licence number: _____ Issuing municipality: _____

If the issuing municipality is not the City of Victoria, is it:

☐ Inter-municipal

☐ Inter-community



Bylaw and Licensing Services Department
1 Centennial Square
Victoria, BC V8W 1P6

str@victoria.ca
victoria.ca/str

2025 Short-Term Rental Business Licence Application

Family Member

Name of individual: _____

Relationship to applicant: _____

Phone number: _____ Email: _____

Address: _____

Other

Name of individual: _____

Relationship to applicant: _____

Phone number: _____ Email: _____

Address: _____



Bylaw and Licensing Services Department
1 Centennial Square
Victoria, BC V8W 1P6

str@victoria.ca
victoria.ca/str

2025 Owner

Consent Form Short-Term Rental

***All owners are required to sign the Owner Consent Form.**

Only digitally verified signatures or signatures physically signed in ink will be accepted.

This is to certify that I Susan Strangway, as the legal owner of
(OWNER)
2-1140 Arthur Currie Lane have read the
(UNIT / STREET ADDRESS)

Short-Term Rental Business Licence Application Form submitted by Susan Strangway
(APPLICANT)

and consent to the above premises being used as a Short-Term Rental in compliance with City of Victoria Bylaws.

I, the undersigned, confirm as the owner(s) that the above noted information is true and will comply with ALL relevant provisions of the Short-Term Rental Regulation Bylaw No. 18-036 and all other applicable City bylaws.

Owner's name: Susan Strangway

Owner's signature: [Redacted Signature] Date: December 31, 2024

Owner's name: _____

Owner's signature: _____ Date: _____

Owner's name: _____

Owner's signature: _____ Date: _____

Owner's name: _____

Owner's signature: _____ Date: _____

If your application is received more than 60 days after consent is given above, it is not considered valid consent.



Bylaw and Licensing Services Department

1 Centennial Square
Victoria, BC V8W 1P6

517-6 VICTORIA.CA
VICTORIA.CA/STR

2025 Strata Council Consent Form Short-Term Rental

*Is this property part of a strata? No ☐ Yes ☐ If yes, please complete the information below.

Only digitally verified signatures or signatures physically signed in ink will be accepted.

This is to certify that I _____, as Strata Council Executive Member
(STRATA COUNCIL EXECUTIVE MEMBER; MUST NOT BE SAME AS APPLICANT)

for _____ have read the Short-Term Rental Business Licence Application Form
(UNIT / STREET ADDRESS)

submitted by _____ I can confirm that our Strata has no bylaws prohibiting the above
(APPLICANT)

address from operating as a Short-Term Rental in compliance with City of Victoria Bylaws.

I, the undersigned, confirm as the business owner(s)/operators(s)/licencee(s) that the above noted information is true and will comply with ALL relevant provisions of the Short-Term Rental Regulation Bylaw No. 18-036 and all other applicable City bylaws.

Applicant's name(s): Susan Strangway

Applicant's signature(s): 1. _____ Date: Dec 31, 2024

(If applicable) 2. _____ Date: _____

Strata Council Executive Member Information

I, the undersigned, confirm as the strata council executive member that the above noted information is true and will comply with all relevant provisions of the Short-Term Rental Regulation Bylaw No. 18-036 and all other applicable City bylaws.

Name: _____

Phone number: _____

Email: _____

Signature: _____ Date: _____

If your application is received more than 60 days after consent is given above, it is not considered valid consent.



Bylaw and Licensing Services Department
1 Centennial Square
Victoria, BC V8W 1P6

str@victoria.ca
victoria.ca/str

2025 Short-Term Rental Business Licence Application

Completion of this application does not guarantee approval. Approved licences will be issued only upon receipt of payment of the Short-Term Rental Business Licence fee. Operating a Short-Term Rental without a valid licence is an offence for which penalties are prescribed. A person found guilty of an offence under this bylaw is subject to a fine of not less than \$250 and not more than \$500 for every instance that an offence occurs or each day that it continues (*Short-Term Rental Regulation Bylaw No. 18-036; Sec. 8*).

Licences are effective from January 16 to January 15 of the following year, are non-transferable and the licence fee(s) paid are non-refundable. Short-Term Rental Business Licences must be re-applied for at the start of each calendar year and must include up-to-date supporting documentation.

Please see website for:

Short-Term Rental Regulation Bylaw No. 18-036

Short-Term Rental Regulation Bylaw Amendment 24-059

Schedule D - Home Occupations, Zoning Regulation Bylaw No. B0-159

Privacy Notification: This information is being collected for the purpose of determining the Operator's eligibility for a Short-Term Rental Business Licence in the City of Victoria pursuant to its bylaws. In providing this information, you have consented to its use for the above-described purpose and declare that all the information provided herein is correct. This information may be shared with applicable City of Victoria departments and related agencies for the purpose of required inspections and approval of this licence application. The legislated authority to collect your personal information is Section 26 (c) of the *Freedom of Information and Protection of Privacy Act* and Section 3 (2) of the *Short-Term Rental Regulation Bylaw*. If you wish to obtain further information regarding the collection of your personal information, please contact the Information Access and Privacy Analyst Archives and Records Management, 1 Centennial Square, Victoria, BC V8W 1P6, 250.361.0347 or email foi@victoria.ca.

*Declaration:

I, the undersigned, confirm as the business owner(s)/operator(s) that the above noted information is true and will comply with ALL relevant provisions of the *Short-Term Rental Regulation Bylaw No. 18-036* and all other applicable City bylaws. Further, failure to meet these obligations may result in the business licence being suspended or reported to City Council for possible revocation. **I understand I cannot commence business until such time as a Short-Term Rental Business Licence has been approved, paid in full and issued.**

Applicant name(s) (printed): Susan Strangway

Applicant signature(s): 1.

Date signed: December 31, 2024

(if applicable) 2.

Date signed: , 20

Only digitally verified signatures or signatures physically signed in ink will be accepted.

Date Stamp (office use only)



Bylaw and Licensing Services Department
1 Centennial Square
Victoria, BC V8W 1P6

str@victoria.ca
victoria.ca/str

2025 Short-Term Rental Business Licence Application

The City of Victoria regulates short-term rentals for the benefit of residents and visitors alike. Licensing and any enforcement actions are carried out in alignment with the City of Victoria's Strategic Plan and pertinent regulations and bylaws. Please see the Short-Term Rental page if you require more information.

Important Notice:

If at some point you become ineligible to operate a short-term rental as a result of regulation changes, you will not be reimbursed or receive a discount on your licence fee.

This application must be completed in full and submitted as one package with all required supporting documents. You can submit your completed package by email to str@victoria.ca or mail it to the above address. Please note that all sections marked with an asterisk (*) are mandatory.

Any submissions that do not meet the requirements above will result in having to reapply. Owner and strata consent must be provided by signing page five and six of the application.

All related documentation and information is available at victoria.ca/str. For information or assistance completing this form, please contact Bylaw and Licensing Services at 250.361.0726 or email str@victoria.ca.

*Short-Term Rental Address (APARTMENT / UNIT / STREET ADDRESS)

Address: 1140 Arthur Currie Lane, Suite 2

Postal code: V9A 7H3

*Applicant Information (WHO THE LICENCE IS ISSUED TO)

An application can be submitted by an owner, tenant or management company of a property. Legal first and last names are required. Please select one of the following options:

- ☒ **Sole Proprietor's name:** (If you plan to operate the business on your own, either under your own name or a business name)
Susan Strangway

LEGAL FIRST NAME, LAST NAME

- ☐ I use a preferred name:

- ☐ **Partnership names:** (If you plan to operate the business with one or more partners)

(1) LEGAL FIRST NAME, LAST NAME

(2) LEGAL FIRST NAME, LAST NAME

- ☐ I use a preferred name:

- ☐ I use a preferred name:

- ☐ **Limited/Incorporated company name:** (If you plan to operate the business as a separate legal entity, separate from yourself and your personal assets)

BUSINESS NAME

DRIVER'S LICENCE and SERVICES CARD

British Columbia CAN

STRANGWAY,
SUSAN KATHLEEN


DL: [REDACTED]



DOB: [REDACTED]

2-1140 ARTHUR CURRIE LN
VICTORIA BC V8A 7H3

Issued: 2022-Sep-21
Expires: 2027-Sep-20
Rest/
End: NONE

Class: [REDACTED] Sex: [REDACTED]
WL: [REDACTED] HL: [REDACTED]
Eyes: [REDACTED] Hair: [REDACTED]


BRITISH
COLUMBIA





KIM TUSON
Acera Insurance

Client Advisor, Personal Insurance

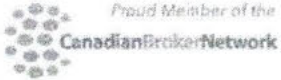
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APPOINTMENT



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Intact Insurance Company (The Company/Insurer)

STRANGWAY, SUSAN
2-1140 ARTHUR CURRIE LANE
VICTORIA, BC
V9A7H3



Personal Property Insurance

Policy Number

[Redacted]

Reason for Issuance
Confirmation

Policy Period At 12:01 A.M. local time at the primary address of the named insured

28 May 2024 to 28 May 2025

Coverage Effective Date

02 Jan 2025

Your Broker is:

ACERA INSURANCE SERVICES LTD.

1ST FLOOR - 710 REDBRICK ST
VICTORIA BC
V8T 5J3

<https://www.acera.ca>

Broker ID #36267



Confirmation of Property Insurance Coverage

(Tenants Comprehensive) 2-1140 ARTHUR CURRIE LANE VICTORIA BC V9A7H3

Coverages

Deductible
\$

Limit
\$

Basic Coverages

Personal Property

Liability



Named Insured/Primary Address

STRANGWAY, SUSAN
2-1140 ARTHUR CURRIE LANE
VICTORIA, BC
V9A7H3

Meter reading information

Energy

Meter number 5520901

Starting Oct 16, 2024..... 99315

Ending Dec 13, 2024..... 194

Difference..... 879

879 kWh used over 59 days



Step 1

Step 2

You're charged the Step 1 price for electricity up to a certain threshold in each billing period, and a higher Step 2 price for all electricity use beyond that threshold. This billing period you stayed in the lower Step 1 price. You were 430 kWh below your Step 2 threshold of 1,309 kWh this billing period.

Your next meter reading is on or around Feb 13, 2025.

Go paperless

Get access to your account online.

To get started, visit bchydro.com/gopaperless.

Maintaining your account

If we receive your payment after the due date, you may be charged a late payment fee. To learn more about your account with BC Hydro, visit bchydro.com/customerservice/rules.

Privacy

Protecting your personal information is an obligation we take seriously. For more information, visit bchydro.com/privacy.

GST Registration

Have a question?

Visit bchydro.com/gethelp

Call us at

Bill details

PREVIOUS BILLING PERIOD

Previous bill..... \$86.31

Payment received Oct 25, 2024..... -\$86.31

BALANCE FORWARD

\$0.00

ELECTRICITY CHARGES

Based on Residential Tiered Rate 1101

Oct 16, 2024 to Dec 13, 2024

Basic Charge 59 days x \$0.2253 /day..... \$13.29*

ENERGY CHARGES

Step 1: 879 kWh x \$0.1097 /kWh..... \$96.43*

Step 2: 0 kWh x \$0.1408 /kWh..... \$0.00

Deferral account rate rider -2.5%..... -\$2.74*

Trade income rate rider -2.3%..... -\$2.52*

B.C. Electricity affordability credit..... -\$9.93

TAXES ON ELECTRICITY CHARGES

* GST 5% on \$104.46..... \$5.22

ELECTRICITY CHARGES SUBTOTAL

\$99.75

TOTAL DUE

\$99.75

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QUICK TIPS

THE REASONS FOR REASONS

This quick reference guide provides some tips for decision-makers on the importance of reasons and how to provide meaningful and understandable reasons.

What is a reason?

“A statement offered in explanation or justification”.¹

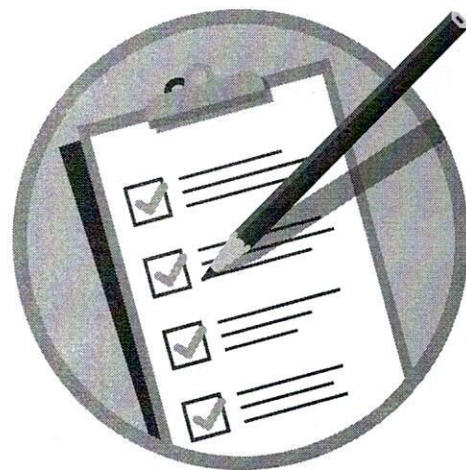
Reasons should explain **what** was considered when making the decision and **why** the decision was made. Reasons should demonstrate that the decision-maker understood the issue, considered all relevant information and evidence, and applied the decision-making criteria to the facts to come to a justifiable conclusion.

What do good reasons look like?

Good reasons explain the decision made and demonstrate why it is reasonable. The Supreme Court of Canada states administrative decision-makers have a “responsibility to justify to the affected party, in a manner that is transparent and intelligible, the basis on which it arrived at a particular conclusion”.²

Reason should generally explain:

- **Issue:** The issue decided.
- **Facts, information and evidence considered:** The information and evidence considered by the decision-maker and any findings of fact the decision-maker made.
- **Decision-making criteria:** The legislation, regulation, policy or other rules used to make the decision. The legal authority to make the decision should also be explained.
- **Analysis:** How the decision-making criteria was applied to the facts to make the decision. The decision should explain the reasoning used to make the decision and how the decision-maker considered and assessed the evidence and arguments presented. It should demonstrate a rational connection between the evidence presented and the conclusions reached.
- **Decision:** The decision made should be clearly stated.
- **Appeal and review options:** Information about any review or appeal options.



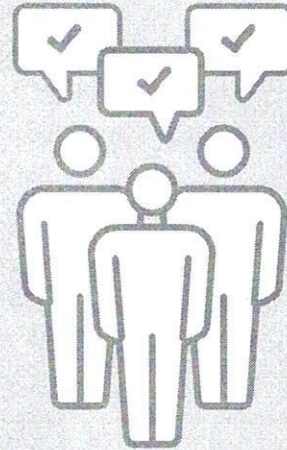
¹Merriam Webster, “Reason” <<https://www.merriam-webster.com/dictionary/reason>>.

²Vavilov v. Canada (Minister of Citizenship and Immigration), [2019] 4 S.C.R. 653 at para 96.

Why are reasons an integral part of fair decision-making?

- Providing reasons can lead to better decision making, "by ensuring that [the] issues and reasoning are well articulated and, therefore, more carefully thought out."³
- Providing reasons supports transparent decision making because it requires the decision-maker to explain how and why the decision was made. Reasons can also demonstrate that specific legal requirements and an organization's policies and practices have been complied with.⁴
- Reasons allow the person or organization impacted by the decision to determine if they wish to seek an appeal or review of the decision.
- Reasons demonstrate that a fair decision-making process was followed and allow those impacted by the decision to understand and accept the decision that was made.

If clear and meaningful reasons are provided, individuals are more likely to accept the decision made, even if they do not agree with it.



When are reasons needed?

Legislation may require reasons. For example, the *Ombudsperson Act*⁵ requires written reasons in certain circumstances. In British Columbia, the *Administrative Tribunals Act*⁶ requires some tribunals to make their final decision in writing and give reasons.

Decision-makers may also be required by the common law duty of fairness to provide reasons.

Generally, when a decision is made that directly impacts a person or organization's rights, privileges or interests it is best practice to provide reasons.

³*Baker v Canada (Minister of Citizenship and Immigration)*, [1999] 2 S.C.R. 817 at para 39.

⁴Ombudsman Western Australia, "Giving reasons for decisions" 1 < <http://www.ombudsman.wa.gov.au/Publications/Documents/guidelines/Giving-reasons-for-decisions.pdf> >.

⁵*Ombudsperson Act*, R.S.B.C. 1996.

⁶*Administrative Tribunals Act*, S.B.C. 2004.

Nature of reasons

Some decisions require formal written reasons. For other decisions, verbal reasons may be sufficient. The nature and length of reasons will depend on the decision being made.

When determining the format of reasons, it is important to consider:

- The nature of the decision and its importance and impact;
- The complexity of the issues and level of detail required;
- Whether the decision is subject to review or appeal; and
- The abilities and level of understanding of the person who is affected.

Consider that while providing reasons verbally can be efficient for the decision-maker, giving written reasons can allow for a greater understanding of the decision. Written reasons also ensure that the decision-maker transparently explains why the decision was made and provides a written record of the decision. When providing written reasons, the reasons should be drafted with the reader in mind and be written in a way that is understandable to them.⁷

In *Baker v Canada*, the Supreme Court of Canada spoke to the importance of reasons and said:

"...in certain circumstances, the duty of procedural fairness will require the provision of a written explanation for a decision. The strong arguments demonstrating the advantages of written reasons suggest that, in cases... where the decision has important significance for the individual, when there is a statutory right of appeal, or in other circumstances, some form of reasons should be required".⁸

⁷Ombudsman Western Australia, "Giving reasons for decisions" 2 < <http://www.ombudsman.wa.gov.au/Publications/Documents/guidelines/Giving-reasons-for-decisions.pdf> >.

⁸*Baker v Canada (Minister of Citizenship and Immigration)*, [1999] 2 S.C.R. 817 at para 43.

Good reasons connect the dots

Adequate reasons provide the information needed to understand the decision.

A common pitfall with decisions is a lack of justification for how a decision-maker reaches their conclusion. This can happen when the decision-maker relies too much on implied reasoning and fails to connect the dots and identify how they got from one step to the next in their chain of analysis. This leaves the reader to fill in the gaps to determine why the decision was made.

One way to avoid this is to ensure decision makers *show their thinking* when communicating decisions by clearly explaining how the information and evidence gathered was considered in the context of the rules that apply.

