

Board Staff Interrogatories

**Superior Energy Management Gas LP (“Superior
Energy”)**

**Gas Marketer Licence Renewal Application
EB-2012-0038**

March 27, 2012

1. Please provide a copy of Superior Energy's financial statements for 2011.
2. Ref: 2010 Audited Financial Statements.

In Superior Energy's estimation, could unrealized losses on derivative financial instruments reverse in the foreseeable future (i.e. within the next year)? If so, please provide an estimate of the amount.

3. Ref: Section 15 b) iii) of the Gas Marketer Licence Renewal Application Form – Personal Experience in the Energy Sector for Key Individual #1, Greg McCamus and Key Individual #2, Susannah Robinson.

The application form states that Mr. McCamus has been President of Superior Energy Management since 2005 and was appointed President of the U.S. Refined Fuels business in late 2009. The application form states that Ms. Robinson has over 23 years experience in the retail and wholesale energy industry with front line experience in structured power and gas trading/origination, transportation and storage management, retail and wholesale marketing and sales, power and gas market development and regulatory proceedings, and has actively grown energy businesses in BC, Quebec, Alberta, Manitoba, Georgia, New York, California, Ohio, Texas, DC, Maryland, Virginia and Pennsylvania.

For each of Mr. McCamus and Ms. Robinson, please provide responses to the following:

Describe your role in the energy sector for ensuring compliance with legal and regulatory requirements including but not limited to the following specific areas:

- a. Describe your accountabilities, directly or indirectly, for any person(s) conducting electricity retailing and/or gas marketing to residential and/or small commercial consumers?
- b. Describe your accountabilities, directly or indirectly, for any person(s) making representations to residential and/or small commercial consumers for the purpose of effecting sales of electricity and/or gas?

- c. Describe your accountabilities, directly or indirectly, for any person(s) entering into agency agreements with residential and/or small commercial consumers?
 - d. Describe your accountabilities, directly or indirectly, for ensuring compliance with legal and regulatory obligations?
4. Ref: Section 14 e) of the Gas Marketer Licence Renewal Application Form – Penalties, Fines, Voluntary Payments as a result of an investigation or any other disciplinary actions by a regulatory body in Ontario and/or other jurisdiction within North America in the past 5 years.

The Ontario Energy Board (the “Board”) issued a Notice of Intention to Make an Order for Compliance and an Administrative Penalty (the “Notice”) to Superior Energy on August 25, 2011. Superior Energy provided a written Assurance of Voluntary Compliance (the “Assurance”) to the Board on September 12, 2011 admitting the deficiencies set out in the Notice; payment of an administrative penalty in the amount of \$25,000; and a commitment to ensuring that, as of the date of the Assurance, the deficiencies set out in the Notice had been corrected. What is Superior Energy’s plan to ensure continued compliance with its legal and regulatory obligations in relation to each/all of the particulars set out in the Notice? In your response, identify the key individual(s) accountable directly or indirectly for compliance and describe the policies, processes and procedures in place or to be put in place to ensure compliance with its legal and regulatory obligations?