

# **ONTARIO ENERGY BOARD**

## **APPLICANT SUBMISSION**

**Application for Gas Marketer Licence**

**2001 RBCP Canadian GP Limited as a general partner of  
RBC Energy Services LP**

**Board File No.: EB-2012-0368**

November 1, 2012

## **BACKGROUND**

On September 10, 2012, 2001 RBCP Canadian GP Limited, in its capacity as general partner of RBC Energy Services L.P. (“RBC ES”), applied to the Ontario Energy Board (the “Board”) for a Gas Marketer licence. In the application RBC ES stated that it only intends to market natural gas to large volume consumers. RBC ES also stated that it is applying for the licence as a precautionary measure if their large volume consumer’s consumption dips below the low-volume threshold or if it decides to market to low-volume consumers in the future.

A licence to market natural gas would enable an applicant to do the following:

- a) sell or offer natural gas to low-volume consumers (consuming 50,000m<sup>3</sup> or less of natural gas per year);
- b) act as an agent or broker for a seller of natural gas to a low-volume consumer; and/or
- c) act or offer to act as an agent or broker of a low-volume consumer in the purchase of gas.

This submission is being provided by RBC ES following a Board staff review of its application and evidence filed in this proceeding. It also follows an invitation to RBC ES by Board staff, in the Board Staff Submission to the Board dated October 25, 2012 (the “Board Submission”), to confirm its knowledge of the obligation to file a Certificate of Compliance, as well as compliance with all relevant codes, regulations and reporting requirements.

## **RBC ES SUBMISSION**

RBC ES notes that, having reviewed the application and evidence, Board staff does not have concerns with licensing RBC ES as a gas marketer.

In its submission, Board staff submitted, among other things, that if RBC ES intends to market natural gas to low-volume consumers, it should notify the Board by filing the necessary Certificate of Compliance with the Board.

Board staff noted in the Board Submission that licensed electricity retailers and licensed gas marketers may not enter into, renew, amend or extend the term of a contract with a low-volume consumer until such time as the marketer or retailer has filed a Certificate of Compliance in the required form and has received from the Board written acknowledgement of it. Board staff also noted that Certificates of Compliance are associated with the obligation set out in section 3 of Ontario Regulation 90/99 (Licence Requirements – Electricity Retailers and Gas Marketers) and in sections 6.1 and 6.2 of the Gas Marketer Code of Conduct.

Board staff invited RBC ES to confirm in its reply submission to the Board its knowledge of the obligation to file a Certificate of Compliance in the above-noted circumstances, as well as compliance with all relevant codes, regulations, and reporting requirements.

RBC ES hereby confirms its knowledge of the obligation to file a Certificate of Compliance if it intends in the future to market natural gas to low-volume consumers, and its compliance with all relevant codes, regulations and reporting requirements.

All of which is respectfully submitted.