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November 9<sup>th</sup>, 2018

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
27-2300 Yonge Street  
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: OM Limited Partnership Rates Application**  
**Ontario Energy Board (OEB) File Number: EB-2018-0234**

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Attached please find OMLP's written reply submission pursuant to OEB procedural order No. 1.  
Should you have any questions please do not hesitate to contact me.

Yours very truly,

A handwritten signature in black ink, appearing to read "SL", with a horizontal line extending to the right.

Scott Lewis  
OM Limited Partnership  
[slewis@tributerresources.com](mailto:slewis@tributerresources.com)  
519-871-0876

cc (email only): Patrick McMahon. Union Gas Limited ([pmcmahon@uniongas.com](mailto:pmcmahon@uniongas.com))

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the *Ontario Energy Board Act, 1998*, S.O.  
1998, c.15, Schedule B;

**AND IN THE MATTER OF** an Application by OM Limited Partnership ("OMLP"),  
pursuant to section 36(1) of the *Ontario Energy Board Act, 1998*, for an  
order or orders approving or fixing just and reasonable rates and other  
charges for the distribution of gas.

**SUBMISSION OF OM LIMITED PARTNERSHIP**

This is the reply of OM Limited Partnership (OMLP).

**A. Reply to Submission of Union Gas Limited (Union)**

1. OMLP holds a limited certificate of public convenience and necessity to serve only one customer. OMLP delivers locally produced Ontario gas between related commercial parties who are bound by their own agreements. OMLP does not request rate payers to subsidize and or cross-subsidize any of its costs and therefore it would not be reasonable or appropriate for OMLP to be held to the same reporting and accountability standards required of other regulated distributors in Ontario.

**B. Reply to Ontario Energy Board (OEB) staff submission**

2. *OMLP response to OEB Page 4 paragraph 3*: No capital component factor is being proposed at this time, but if the circumstances warrant, it could be applied for at a later time.
3. *OMLP response to OEB Page 5 "Exemption Requests"*: OMLP holds a limited certificate of public convenience and necessity to serve only one customer who is a party to the Limited Partnership. OMLP respectfully submits that the Affiliate Relationships Code (ARC) and the Gas Distribution Access Rule (GDAR) were never intended to be applicable to a one customer gas delivery distribution situation from locally produced Ontario gas between or among related commercial parties who are bound by their own agreements. OMLP is not requesting rate payers to subsidize any of its costs.

If OMLP serves any other customer in the future, the exemptions would have to be re-visited. Below is a list of the sections in the ARC and the GDAR which apply and OMLP is requesting exemption from and the sections which simply do not apply:

ARC

- 2.1 Degree of Separation – applies
- 2.2 Sharing of Services and Resources – applies
- 2.3 Transfer Pricing and Cost Information Disclosure – does not apply
- 2.4 Financial Transactions with Affiliates – applies
- 2.5 Equal Access to Services – does not apply
- 2.6 Confidentiality of Information – does not apply
- 2.7 Compliance Measures – applies
- 2.8 Record Keeping and Reporting Requirements – applies

GDAR

2 Access to Gas Distribution Services – does not apply as customer is a partner to OMLP.

- 2.1 – Gas Distributor Provides Services – does not apply
- 2.2 – Connection to and Expansion of a Gas Distribution System – does not apply
- 2.3 – Gas Distributor Record Keeping Responsibilities – applies

3 Gas Distributor-Gas Vendor Relations – applies

- 3.1 General – does not apply
- 3.2 Service Agreement – applies
- 3.3 Gas Vendor Information – does not apply
- 3.4 Financial Security Arrangements with Gas Vendors – does not apply

4 Service Transaction Requests

- 4.1 General – does not apply
- 4.2 STR Information Requirements – does not apply
- 4.3 Processing and Verification – does not apply
- 4.4 Notification Requirements – does not apply
- 4.5 STR Implementation Date – does not apply
- 4.6 Implementation Deadline – does not apply
- 4.7 Electronic Business Transaction System – does not apply
- 4.8 Transfer of Consumer to System Gas when a Gas Distributor Terminates a Service Agreement – does not apply

5 Consumer Information

- 5.1 Description of Consumer Information – applies
- 5.2 Use of Consumer Information – applies
- 5.3 Restrictions on Disclosure – does not apply
- 5.4 Retention of Consumer Information – applies
- 5.5 Release of Information – applies
- 5.6 Access to the Meter – applies

6 Billing

- 6.1 Gas Distributor Obligations – does not apply
- 6.2 Risk of Non-Payment – does not apply

7 Service Quality Requirements Performance and Measurement

7.2 Identifying Service Quality Requirements – applies

7.3 Definitions and Performance Measurements – does not apply

8 Customer Service Standards and Practices Applicable to Residential Customers

8.1 General – does not apply

8.2 Policy to be Published – does not apply

8.3 Compliance – does not apply

8.4 Dispute Resolution – does not apply

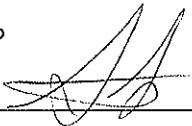
8.5 Revisions to a Customer Service Policy – does not apply

4. *OMLP response to OEB Page 9:* OMLP agrees to the filing of an annual report with the OEB and all of the proposed conditions and reporting requirements however OMLP requests that rather than providing audited financial statements, OMLP provides in-house financial statements or Notice to Reader Financial Statements in accordance with the OEB's *Uniform System of Accounts for Class A Gas Utilities*. Audits are onerous and costly and as such we respectfully request this reporting methodology.

OMLP appreciates the opportunity to participate in this process and to conform to the Board's expectations.

ALL OF WHICH IS RESPECTFULLY SUBMITTED BY

OMLP

A handwritten signature in black ink, appearing to be 'Scott Lewis', is written over a horizontal line.

Scott Lewis- President

OM Energy GP Inc.