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September 19, 2014

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
Suite 2700
Toronto, Ontario, M4P 1E4

Dear Ms. Walli:

**Re: EB-2014-0198 – Policy Review of Electricity and Natural Gas Distributors'
Residential Customer Billing Practices and Performance - Cost Eligibility Request
of the London Property Management Association**

Statement of Interest

1. The London Property Management Association (“LPMA”) is a non-profit organization whose overall goal is to help property managers and those who own/operate residential income properties in the City of London and surrounding communities. The LPMA offers information and assistance to its members to help them deal with the legislation, rules and regulations that affect their business.
2. LPMA is made up of approximately 400 landlord members ranging from single unit owners to managers and owners of in excess of 2,000 units. The membership consists of a representative cross section of the rental property owners in the London area. In total, the LPMA members own or manage more than 35,000 rental units in the London area.
3. LPMA members receive regulated electricity service from London Hydro and other nearby electricity distributors. They also received regulated natural gas service from Union Gas. As many of the members are single unit owners, they receive service under the Residential rate from electricity distributors and under the general service rate from Union Gas that includes residential customers. The membership of the LPMA wishes to intervene in this policy review because the issues, methodologies and impacts raised by the review may result in changes to regulated rates and/or costs and impact how bills are delivered to ratepayers. The views of these individuals and businesses should be considered in this proceeding.
4. LPMA intends to actively participate in this policy review by reviewing the material provided by the Board and providing comments on the questions set out in the report.

Intervention

5. LPMA hereby gives notice of its intention to intervene in the policy review.

Cost Eligibility

6. LPMA intends to seek an award of costs and is requesting that the Board determine that it is eligible for an award of costs.

7. As indicated above, the LPMA is comprised of small and mid-sized residential and commercial customers that take regulated services from London Hydro and other nearby electricity distributors and from Union Gas. Its members have a substantial interest in these proceedings, including all issues that affect rates and services available to them. Billing practices are of importance to these customers.

8. LPMA submits that it is eligible to apply for a cost award based on section 3.03 (a) of the Practice Direction on Cost Awards, revised April 24, 2014. In particular, LPMA “primarily represents the direct interests of consumers (e.g. ratepayers) in relation to regulated services”.

9. The Board has found the LPMA to be eligible for cost awards in numerous natural gas and electricity proceedings before the Board. As indicated above, the LPMA is intervening on behalf of its members which are consumers (i.e. ratepayers) in relation to regulated services provided by electricity distributors. As such, LPMA submits that it is eligible for a cost award under Section 3.03.

10. LPMA has conformed with section 3.03.1 of the Practice Direction, as a party that frequently applies for intervenor status and cost award eligibility in Board proceedings. The information requested in section 3.03.1 was filed with the Board in June, 2014, which can be found on the Board's website, here:

http://www.ontarioenergyboard.ca/oeb/Documents/Intervenor_Filings/LPMA_2014_annual_intervenor_filing_20140625.pdf .

Communications

11. All communications related to this Notice of Intervention and to this policy review should be directed to:

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Yours very truly,

Randy Aiken

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