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December 27, 2016

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Walli,

RE: EB-2016-0137 – EB-2016-0138 – EB-2016-0139 – EPCOR Southern Bruce Gas Inc. – Notice of Intervention and Cost Eligibility Request of 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 natural gas service from Union Gas under a number of rates, including M1, M2 and M4.
4. The membership of the LPMA wishes to intervene in this application because the Ontario Energy Board (“OEB”) may consider issues regarding how franchise agreements and certificates will be considered within the broad framework of natural gas expansions, given the findings from the decision on the OEB’s generic hearing on natural gas expansion (EB-2016-0004), in which LPMA was an active participants.
5. The EB-2016-0004 natural gas expansion proceeding provided guidance on a new framework that the OEB intends to implement. Some of the matter contemplated include potential competition amongst distributors to serve new areas, and the hearing of a rates case (or possibly a leave to construction case) prior to, or in conjunction with, the granting of a certificate or franchise. These components of the new framework and other elements of the natural gas expansion proceeding will likely be relevant to the EPCOR applications and to future applications of a similar nature.
6. LPMA intends to actively participate in this process for the purpose of ensuring the record in this process is complete and to make submissions on the issues which are raised in the process.

Intervention

7. LPMA hereby gives notice of its intention to intervene in, and appear at, all phases of the application.
8. LPMA reserves the right to be heard, to appear by or with counsel and/or consultant, to ask questions and to seek clarification on all matters raised during the process that may relate to its interests and to present submissions.
9. LPMA hereby requests that the Board and all other parties provide it with **hard copies** of all material and correspondence related to the Applications and the Hearing.

Cost Eligibility

10. LPMA intends to seek an award of costs and is requesting that the Board determine that it is eligible for an award of costs.
11. As indicated above, the LPMA is comprised of small and mid-sized commercial customers that take regulated services from natural gas and electricity distributors. Its members have a substantial interest in these proceedings, including all issues that may affect rates and services available to them.
12. 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”.
13. The Board has found the LPMA to be eligible for cost awards in numerous natural gas, electricity and policy related 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 regulated distributors. As such, the LPMA submits that it is eligible for a cost award under Section 3.03.
14. 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, 2016, which can be found on the Board's website, here:

<http://www.ontarioenergyboard.ca/OEB/Industry/Regulatory+Proceedings/Applications+Before+the+Board/Annual+Filings+-+Frequent+Intervenors> .

Communications

15. All communications related to this Notice of Intervention and to this proceeding should be directed to:

Mr. Randy Aiken
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578 McNaughton Ave. West
Chatham, Ontario, N7L 4J6

Telephone: 519-351-8624
E-mail: randy.aiken@sympatico.ca
16. As noted above, LPMA requests that hard copies of all the materials filed during these proceedings be provided directly to Mr. Aiken at the above noted address.

Yours very truly,

Randy Aiken

Randy Aiken
Aiken & Associates

c.c. Britt Tan (EPCOR)