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May 22, 2019

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-2019-0003 – Post-2020 Natural Gas Demand Side Management Framework
- Notice of Intervention and Cost Eligibility Request of London Property
Management Association**

Please find attached a Notice of Intervention and Request for Cost Eligibility of the London Property Management Association ("LPMA") in the above noted consultation process.

Sincerely,

Randy Aiken

Randy Aiken
Aiken & Associates

cc: Interested Parties

**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 distribution service from Enbridge Gas Inc. (formerly Union Gas Limited). The membership of the LPMA wishes to intervene in this consultation process because the issues, allocation methodologies and impacts raised in the consultation are likely to result in changes to regulated rates and/or costs and the availability of DSM programs to its members. The views of these businesses should be considered in this proceeding.

4. LPMA intends to actively participate in this process for the purpose of ensuring the record in this consultative is complete and to make submissions on the issues which may be in the process, including costs, incentives, allocation of costs to rate classes, measurement of savings, cost-effectiveness of the amounts spent, the impact of the merger of Union Gas and Enbridge Gas Distribution on the administrative costs, the co-ordination of gas DSM and electric CDM programs and any other issues that may arise through the consultation.

Intervention

5. LPMA hereby gives notice of its intention to intervene in, and appear at, all phases of the consultative.

6. LPMA hereby requests that the Board and all other parties provide it with electronic copies of all material related to the consultative.

Cost Eligibility

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

8. As indicated above, the LPMA is comprised of small and midsized commercial customers that pay regulated distribution rates. Its members have a substantial interest in this proceeding, including all issues that affect costs to be paid by them.

9. 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".

10. 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 Enbridge Gas Inc. As such, the LPMA submits that it is eligible for a cost award under Section 3.03.

11. 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, 2018, 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

12. LPMA request that the Board and other parties provide its consultant, Mr. Randy Aiken, with electronic copies of all relevant materials at the e-mail address noted below.

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

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

Telephone: 519-351-8624
E-mail: randy.aiken@sympatico.ca

Yours very truly,

Randy Aiken

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