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May 20, 2020

Christine E. Long
Registrar and Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Long,

RE: EB-2020-0133 - London Property Management Association Notice of Intervention and Request for Cost Eligibility Determination – Consultation on the Deferral Account – Impacts Arising from the COVID-19 Emergency

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 services from regulated electricity distributors, regulated electricity transmitters, regulated natural gas distributors and from Ontario Power Generation. The membership of the LPMA wishes to intervene in this consultation because the issues, methodologies and impacts raised in the application associated with the COVID-19 related deferral account may result in changes to regulated rates and costs, either directly or indirectly. The views and concerns of these businesses should be considered in this proceeding.
4. LPMA intends to actively participate in this proceeding for the purpose of ensuring the record in this proceeding is complete and to make submissions on the issues which may be raised in the application, including any direct and indirect costs associated with the proposal and any other issues that may be raised in the proposal or arise throughout the hearing process.
5. The areas of interest to LPMA include, but are not limited to, the following areas as set out in the Ontario Energy Board’s letter of May 14, 2020: advanced policy direction, general principles, accounting matters, the nature of the costs and materiality of the costs and the recovery mechanism and timing.

Intervention

6. LPMA hereby gives notice of its intention to intervene in, and appear at, all phases of the public hearing.

7. LPMA reserves the right to be heard, to appear by or with counsel and/or consultant, to ask interrogatories and to cross-examine on all matters raised during the proceeding that may relate to its interests, to adduce evidence on specific matters of its choice related to the Applications, and to present argument.

8. LPMA hereby requests that the Board, Enbridge Gas, and all other parties provide it with copies of all evidence and correspondence related to the Application and the Hearing.

Cost Eligibility

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

10. As indicated above, the LPMA is comprised of small and mid sized commercial customers of Enbridge Gas that take regulated services in the Union South rate zone. Its members have a substantial interest in these proceedings, including all issues that affect rates and services available to them.

11. 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".

12. 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. As such, the LPMA submits that it is eligible for a cost award under Section 3.03.

13. 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:

<https://www.ceb.ca/industry/applications-ceb/intervenor-information/annual-filings-frequent-intervenors>

14. LPMA does not have access to any other funding to enable it to participate in this consultation.

Communications

15. All communications related to this Notice of Intervention and to this proceeding should be directed to LPMA's consultant, who has more than 30 years of experience in the regulated electricity and natural gas industries in Ontario. Contact details are as follows:

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Yours very truly,

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