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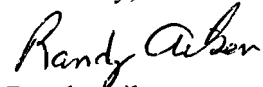
Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
Suite 2700
Toronto, Ontario, M4P 1E4

Dear Ms. Walli:

Re: EB-2009-0166 –Submissions of the LPMA – Union Gas Limited 2010 Natural Gas Demand Side Management Plan – Low Income

Please find attached the submissions of the London Property Management Association in the above noted proceeding.

Sincerely,



Randy Aiken
Aiken & Associates

cc Chris Ripley, Union Gas

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 Union Gas
Limited for approval of its 2010 Natural Gas Demand Side
Management Plan.

**SUBMISSIONS OF THE LONDON PROPERTY
MANAGEMENT ASSOCIATION**

I. INTRODUCTION

This is the argument of the London Property Management Association (“LPMA”) related to the application of Union Gas Limited for an order granting approval of its 2010 Low-Income Natural Gas Demand Side Management (“DSM”) Plan.

On May 13, 2009, the Board issued a letter directing the distributors to remove programs related to low income energy consumers from the 2010 DSM plans. These programs were to be addressed through the Low Income Energy Assistance Program Conservation Working Group (EB-2008-0150).

On September 28, 2009 the Minister of Energy and Infrastructure advised the Board of the government’s plan to develop a province-wide integrated program for low-income energy consumers. The Minister requested that the Board not proceed to implement new support programs for low-income energy consumers in advance of a ministerial direction.

In its letter of September 28, 2009 the board requested that Union Gas and Enbridge Gas Distribution file their low-income DSM based on the existing DSM framework established in the DSM Generic Proceeding Decision (EB-2006-0021).

II. CONSISTENCY WITH CURRENT DSM FRAMEWORK

LPMA submits that Union has filed a 2010 Low-Income DSM plan that is based on the existing DSM framework established in EB-2006-0021.

III. MOST EFFECTIVE USE OF LIMITED RESOURCES

In response to an interrogatory from the LPMA (Exhibit C4.1), Union indicated that it believes that the most effective way to provide low-income customers with significant energy savings is through building envelope upgrades, including basement insulation, wall insulation, attic insulation and draft-proofing measures. Union further indicated that with a limited budget in place for low-income programming, it was in the best interest of low-income customers to allocate these dollars towards building envelop upgrades. LPMA agrees and submits that the Board should accept the low-income programming as proposed by Union.

V. COSTS

LPMA requests that it be awarded 100% of their reasonably incurred costs of participating in this proceeding.

All of which is respectfully submitted this 17th day of November, 2009.



Randall E. Aiken
Consultant to
London Property Management Association