

# *Aiken & Associates*

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October 1, 2012

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

Dear Ms. Walli:

**Re: EB-2012-0383 – Review of Cost Allocation Policy for Unmetered Loads - Participation and Cost Eligibility Request of the London Property Management Association**

This letter is in response to the Board's October 1, 2012 letter related to the above noted consultation. Three paper copies have been provided to the Board and an electronic version has been filed through the Board's web portal at [www.pes.ontarioenergyboard.ca/eservice/](http://www.pes.ontarioenergyboard.ca/eservice/).

The London Property Management Association ("LPMA") wishes to participate in the process because the issues, methodologies and impacts raised by this consultation may have significant impacts on the costs paid by LPMA members for the cost of regulated services. As the Board is aware, cost allocation is a zero sum exercise so changes for one or more rate classes will affect costs allocated to other rate classes. LPMA is requesting that the Board determine that it is eligible for a cost award for all activities related to this consultation.

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. In particular, LPMA "primarily represents the direct interests of consumers (e.g. ratepayers) in relation to regulated services". The Board has found the LPMA to be eligible for cost awards in numerous natural gas and electricity proceedings before the Board.

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.

LPMA is made up of more than 380 landlord members ranging in size 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 and surrounding area. In total, LPMA members own or manage more than 35,000 rental units in the London and surrounding area. The majority of these members own or manage 10 or less rental units.

As a non-profit organization, LPMA does not have access to any other funding sources. LPMA relies on the cost awards it receives from the Board to effectively participate in, and assist the Board, in regulatory proceedings and consultations.

As part of the Board's letter, the Board indicated that the name and credentials of any lawyer, analyst or consultant that may be retained should be provided, if known. LPMA advises the Board that it will be retaining Mr. Randy Aiken of Aiken & Associates to represent it in this process. Mr. Aiken has over two and a half decades of utility and regulatory expertise in both electricity and natural gas.

Contact information is as follows:

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If you require any further information or clarification, please contact me.

Sincerely,

*Randy Aiken*

Randy Aiken  
Aiken & Associates