

November 28, 2013

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

Dear Ms. Walli:

RE: London Property Management Association Notice of Intervention & Request for Cost Eligibility – EB-2013-0365 – Union Gas Limited Rates Effective January 1, 2014

We are writing this letter to seek intervenor status and cost award eligibility in this proceeding on behalf of the London Property Management Association ("LPMA").

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 380 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 Limited primarily under rates M1, M2 and M4. The membership of the LPMA wishes to intervene in this proceeding because of the issues and impacts raised by this application and the changes in Union's rate schedules that may result from this application.
4. LPMA was an active participant in the process which resulted in Incentive Ratemaking Framework upon which this application is based. LPMA members will also be significantly impacted by the proposal to allow direct purchase customers to shift their natural gas delivery obligation from Parkway to Dawn.

Cost Eligibility

5. LPMA intends to seek an award of costs. 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. LPMA submits that it is eligible for an award of costs based on the Board's eligibility criteria and requests the Board's determination of such cost eligibility.

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

7. The Board's cost eligibility criteria, found in Section 3 of the Practice Directions on Cost Awards includes a number of criteria related to the LPMA. Specifically, Section 3.03(a) states that a party is eligible to apply for a cost award where the party primarily represents the direct interests of consumers (e.g. ratepayers) in relation to regulated services. As indicated above, LPMA is intervening on behalf of its members which are consumers (i.e. ratepayers) in relation to regulated services provided by Union Gas. As such, the LPMA submits that it is eligible for a cost award under Section 3.03(a).

8. LPMA notes that it has been found to be eligible for an award of costs in past proceedings for Union Gas rate applications.

Communications

9. 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

DATED at Chatham, Ontario this 28th day of November, 2013.

LONDON PROPERTY MANAGEMENT ASSOCIATION

By its Consultant

Randy Aiken

Randy Aiken
Aiken & Associates

cc: Chris Ripley, Union Gas Limited (e-mail)