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April 1, 2014

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

Dear Ms. Walli:

Re: EB-2014-0138 – Review of the Board's Policies and Processes to Facilitate Electricity Distributor Efficiency: Service Area Amendments and Rate-Making Associated with Distributor Consolidation - Participation and Cost Eligibility Request of the London Property Management Association

This letter is in response to the Board's March 31, 2014 letter related to the above noted invitation to provide written comments on the staff Discussion Paper. 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/.

The London Property Management Association ("LPMA") wishes to participate in the review because the outcome of this policy and process review may have significant impacts on LPMA members through both rates and service quality. Given the Ontario Energy Board's emphasis on customer engagement and customer focus, LPMA submits it is essential for the Board to have input from organizations such as the LPMA. LPMA is requesting that the Board determine that it is eligible for a cost award for all activities related to this consultation and stakeholder conference.

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, policy reviews 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 nearly three 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

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Aiken & Associates