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June 19, 2014

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4

Dear Ms. Walli,

**RE: Frequent Intervenor Filing Information of the London Property Management Association**

Introduction

The London Property Management Association ("LPMA") is a frequent intervenor in proceedings and consultatives at the Ontario Energy Board (the "Board"). This letter is in response to the Board's Rules of Practice and Procedure (revised April 24, 2014) and the Practice Direction On Cost Awards (revised April 24, 2014).

In particular, this letter addresses the requirements set out in Section 22.03, subsection (b) of the revised Rules of Practice and Procedure that states that every letter of intervention shall contain the following information:

*"in the case of a frequent intervenor, an attached document describing the intervenor, its mandate and objectives, membership, if any, the constituency represented, the types of programs or activities carried out, and the identity of their authorized representative in Board proceedings, unless such a document was otherwise filed within the previous 12 month period."*

As well, Section 3.03.1 in the revised Practice Direction states that:

*"A party that frequently applies for intervenor status and cost award eligibility in Board proceedings shall file with the Board, at least annually, the following information about the party:*

- (a) its mandate and objectives;*
- (b) its membership and the constituency it represents;*
- (c) the types of programs or activities that the party carries out;*
- (d) the identity of the individual(s) that represent the party in Board proceedings;*
- (e) any other information that could be relevant to the Board's consideration of the party's application for intervenor status and cost award eligibility; and*



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*(f) updates to any information previously filed."*

#### Frequent Intervenor

LPMA is a frequent intervenor in that it intervenes in proceedings that affect the rates paid for regulated services it receives from a number of regulated entities including Union Gas, London Hydro, Hydro One Networks Transmission and Ontario Power Generation. LPMA also intervenes in Board policy consultations and proceedings that deal with issues that may affect the price, quality and availability of regulated services to LPMA members.

#### Membership

LPMA is a non-profit organization located in London, Ontario that provides information and education to landlords and has been doing so since 1967.

The association has more than 400 landlord members representing approximately 35,000 rental units in the London area. Membership is open to landlords and property management professionals who own or manage one or more residential rental unit. The membership consists of a representative cross section of the rental property owners in the London area, ranging from single unit owners to managers and owners of in excess of 2,000 units. The majority of these members own or manage 10 or fewer rental units.

#### Mandate

LPMA's mandate is to assist property managers and those who own/operate residential income properties in the City of London and surrounding communities by offering information and assistance to its members to help them deal with the legislation, rules and regulations that affect their business.

#### Cost Award Eligibility

LPMA seeks a determination of its eligibility for a cost award in each proceeding in which it seeks to intervene. As per Section 4.01 of the revised Practice Direction on Cost Awards, a party that will request costs must make a request for cost eligibility that includes the reasons as to why the party believes that it is eligible for an award of costs by addressing the Board's cost eligibility criteria.

LPMA believes 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. LPMA is comprised of commercial customers that pay for regulated services that are provided by regulated natural gas distributors, electricity distributors and transmitters and OPG. Its members have a substantial interest in these proceedings, including all issues that affect costs to be paid by them.

The Board's cost eligibility criteria, found in Section 3 of the revised Practice Direction on Cost Awards includes a number of criteria. 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.



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ratepayers) in relation to regulated services that are regulated by the Board. As a result, LPMA submits that it is eligible to apply for a cost award.

#### Additional Information

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. LPMA further notes that it has been found to be eligible for an award of costs in past proceedings and consultations.

#### Representation in Board Proceedings


As part of the Board's revised Rules, intervenors are required to appoint and authorize an individual or individuals who represent them and act on their behalf in Board proceedings.

LPMA advises the Board that it appoints and authorizes Mr. Randy Aiken to represent it in Board proceedings. Mr. Aiken has three decades of utility and regulatory expertise in both electricity and natural gas.

Please contact us if the Board requires any clarification or requires further information.

Sincerely,

**LONDON PROPERTY  
MANAGEMENT ASSOCIATION**

  
Emma Sims  
President

