

Aiken & Associates

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September 12, 2014

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

Dear Ms. Walli,

RE: EB-2014-0261 - London Property Management Association Notice of Intervention and Request for Cost Eligibility Determination

Please find attached a Notice of Intervention and Request for Cost Eligibility of the London Property Management Association in the above noted application.

Sincerely,

Randy Aiken

Randy Aiken
Aiken & Associates

Encl.

cc: Karen Hockin, Union Gas Limited (e-mail)

ONTARIO ENERGY BOARD

IN THE MATTER OF The Ontario Energy Board Act, 1998, S.O. 1998, c.15, Schedule B, and in particular, S. 36 thereof;

AND IN THE MATTER OF The Ontario Energy Board Act, 1998, S.O. 1998, c.15, Schedule B, and in particular, S.90.(1) thereof;

AND IN THE MATTER OF The Ontario Energy Board Act, 1998, S.O. 1998, c.15, Schedule B, and in particular, S.91 thereof;

AND IN THE MATTER OF an Application by Union Gas Limited for an Order or Orders for approval of recovery of the cost consequences of all facilities associated with the development of the proposed Lobo C Compressor/Hamilton-Milton Pipeline project;

AND IN THE MATTER OF an Application by Union Gas Limited for an Order or Orders granting leave to construct natural gas pipelines and ancillary facilities in the City of Hamilton, City of Burlington and Town of Milton, and leave to construct a compressor and ancillary facilities in the Municipality of Middlesex Centre.

**NOTICE OF INTERVENTION
OF
LONDON PROPERTY MANAGEMENT ASSOCIATION**

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 400 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 its members have a substantial interest in the issues and impacts raised by this application and the changes in Union's rates that may result from this application.

Intervention

4. LPMA hereby gives notice of its intention to intervene in, and appear at, all phases of the public Hearing.

5. LPMA reserves the right to be heard, to appear by or with counsel and/or consultant, to ask interrogatories and to cross-examine on all matters raised during the Hearing that may relate to its interests, to adduce evidence on specific matters of its choice related to the Application, and to present argument.

6. LPMA hereby requests that the Board, Union Gas and all other intervenors provide it with copies of all evidence and correspondence related to the Application and the Hearing.

Cost Eligibility

7. LPMA intends to seek an award of costs and is requesting that the Board determine that it is eligible for an award of costs.

8. 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.

9. 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, revised April 24, 2014. In particular, LPMA “primarily represents the direct interests of consumers (e.g. ratepayers) in relation to regulated services”.

10. The Board has found the LPMA to be eligible for cost awards in numerous natural gas and electricity proceedings before the Board. As indicated above, the 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.

11. LPMA has conformed with section 3.03.1 of the Practice Direction, as a party that frequently applies for intervenor status and cost award eligibility in Board proceedings. The information requested in section 3.03.1 was filed with the Board in June, 2014, which can be found on the Board's website, here:

http://www.ontarioenergyboard.ca/oeb/Documents/Intervenor_Filings/LPMA_2014_annual_intervenor_filing_20140625.pdf .

Communications & Request for Written Evidence

12. 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

13. LPMA requests that a hard copy of the evidence, along with interrogatory responses and any other material upon which the application is based be provided to its consultant at the above noted address.

DATED at Chatham, Ontario this 29th day of October, 2014.

LONDON PROPERTY MANAGEMENT ASSOCIATION

By its Consultant

Randy Aiken

Randy Aiken

Aiken & Associates

c.c. Karen Hockin (Union Gas)