

# Aiken & Associates

578 McNaughton Ave. West  
Chatham, Ontario, N7L 4J6

Phone: (519) 351-8624  
Fax: (519) 351-4331  
E-mail: [raiken@xcelco.on.ca](mailto:raiken@xcelco.on.ca)

June 2, 2008

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

Dear Ms. Walli:

**Re: EB-2008-0106 – Notice of Intervention and Request for Cost Eligibility  
Determination for the London Property Management Association – Commodity  
Pricing, Load Balancing and Cost Allocation Methodologies for Natural Gas  
Distributors in Relation to Regulated Gas Supply**

This letter is in response to the Board's May 29, 2008 letter related to the Notice of Proceeding on Commodity Pricing, Load Balancing and Cost Allocation Methodologies for Natural Gas Distributors in Relation to Regulated Gas Supply. Two paper copies have been provided to the Board and an electronic version has been file through the Board's web portal at [www.errr.oeb.gov.on.ca](http://www.errr.oeb.gov.on.ca). Copies have also been sent to Enbridge Gas Distribution Inc., Union Gas Limited, and Natural Resource Gas Limited.

**Statement of Interest**

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.

LPMA is made up of approximately 350 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.

LPMA members receive regulated natural gas service from Union Gas, primarily under rates M1, M2 and M4. LPMA wishes to participate in this process because the Board's decision in this proceeding may have an effect on the LPMA members that currently receive regulated gas supply, balancing and delivery services from Union. Because of the cost allocation issue being raised, the Board's decision in this proceeding may also have

an effect on the rates paid for regulated services taken by the LPMA members that currently are direct purchase.

### **Cost Eligibility**

LPMA is requesting that the Board determine that the LPMA is eligible for a cost award for all activities related to this proceeding.

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.

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 these regulatory proceedings.

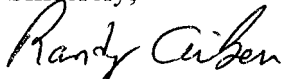
### **Communications**

All communications related to this process should be directed to:

Mr. Randy Aiken  
Aiken & Associates  
578 McNaughton Ave. West  
Chatham, Ontario, N7L 4J6

Telephone: 519-351-8624  
Facsimile: 519-351-4331  
E-mail: [raiken@xcelco.on.ca](mailto:raiken@xcelco.on.ca)

Sincerely,



Randy Aiken  
Aiken & Associates

cc: Mark Kitchen, Union Gas  
Patrick Hoey, Enbridge Gas Distribution  
Mark Bristoll, Natural Resource Gas Limited