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December 6, 2017

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-2017-0307 – Enbridge Gas Distribution Inc. and Union Gas Limited New Rate Framework - London Property Management Association Notice of Intervention and Request for Cost Eligibility Determination

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 landlord 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 under a number of rates, including M1, M2 and M4. The membership of the LPMA wishes to intervene in this application because of the potential impact on rates that will result from the new framework to set rates for the 2019 through 2028 period. LPMA members are concerned with, among other things, the lack of any productivity or stretch factors included in the proposed framework and with the potential for significant excess profits to accrue to the shareholder rather than sharing efficiency gains with ratepayers over the proposed rate setting period. The views of these businesses should be considered in this proceeding.
4. LPMA intends to actively participate in this application for the purpose of ensuring the record in this process is complete and to make submissions on the issues which are raised in the process.

Intervention

5. LPMA hereby gives notice of its intention to intervene in, and appear at, all phases of the application.

6. LPMA reserves the right to be heard, to appear by or with counsel and/or consultant, to ask questions and to seek clarification on all matters raised during the process that may relate to its interests and to present submissions.

7. LPMA hereby requests that the Board and all other parties provide it with copies of all material and correspondence related to the Application and the Hearing.

Cost Eligibility

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

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

10. 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”.

11. 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.

12. LPMA has conformed to 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, 2017, which can be found on the Board's website, here:

<https://www.oeb.ca/industry/applications-oeb/intervenor-information/annual-filings-frequent-intervenors>

Communications

13. All communications related to this Notice of Intervention and to this proceeding should be directed to:

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Yours very truly,

Randy Aiken

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Aiken & Associates

c.c. Vanesa Innis, Union Gas (by e-mail)
EGD Regulatory Proceedings (by e-mail)