

# *Aiken & Associates*

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

Phone: (519) 351-8624

E-mail: [randy.aiken@sympatico.ca](mailto:randy.aiken@sympatico.ca)

December 19, 2017

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: EB-2015-0304 - London Property Management Association 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 services from regulated electricity distributors under a number of rates, including residential, GS < 50 kW and GS > 50 kW. The membership of the LPMA wishes to participate in this policy consultation because the issues, methodologies and impacts raised by the review may result in significant changes to regulated rates, charges and/or costs based on the allocation of costs to pole attachments. The views of these businesses should be considered in this proceeding.
4. LPMA intends to actively participate in this review process 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 review process.
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 review.

### **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 residential and commercial customers that take regulated services from electricity distributors. Its members have a substantial interest in these proceedings, including all issues that affect rates, charges 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 services provided by electricity distributors. As such, the LPMA submits that it is eligible for a cost award under Section 3.03.

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

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

13. LPMA does not have any other source of funding and relies on intervenor funding in order to participate in proceedings, reviews and processes at the OEB.

14. LPMA has retained Mr. Randy Aiken of Aiken & Associates for this review. Mr. Aiken has more than 30 years of regulatory experience, including cost allocation and rate design.

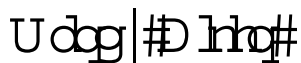
#### **Communications**

15. 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](mailto:randy.aiken@sympatico.ca)

Yours very truly,



Randy Aiken  
Aiken & Associates