

# *Aiken & Associates*

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April 13, 2018

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-2017-0129 – Draft Report of the Ontario Energy Board: Framework for the Assessment of Distributor Gas Supply Plans - 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 Limited primarily under rates M1, M2 and M4. The membership of the LPMA wishes to provide comments on the draft report because many of its members are system gas customers of Union Gas. These members rely on Union for their gas purchases. They are concerned with the cost of gas and the security/reliability of gas deliveries. The views of these businesses should be considered in this proceeding.
4. LPMA intends to provide comments on the draft report.

**Intervention**

5. LPMA hereby gives notice of its intention to provide comments on the draft report noted above.

**Cost Eligibility**

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

7. As indicated above, the LPMA is comprised of small and mid sized commercial customers of Union Gas that take regulated services from Union, including the purchase of system gas. Its members have a substantial interest in this proceeding, including all issues that affect the costs and reliability of system gas purchases 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 (system gas) 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 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> .

### **Communications**

12. 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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