

# *Aiken & Associates*

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December 19, 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-2017-0183- Cost Eligibility Request of London Property Management Association**

Please find attached a Request for Cost Eligibility of the London Property Management Association ("LPMA") in the above noted application.

Sincerely,

*Randy Aiken*

Randy Aiken  
Aiken & Associates

**EB-2018-0130**

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**COST ELIGIBILITY REQUEST  
OF  
LONDON PROPERTY MANAGEMENT ASSOCIATION**

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**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 electricity service from London Hydro and regulated natural gas service from Union Gas. The membership of the LPMA wishes to participate in this hearing because the proposed changes in the codes and rules may have an impact on LPMA members. As such, the views of these businesses should be considered in this hearing.
4. LPMA intends to provide comments on the material attached to the Notice of Hearing.
5. LPMA hereby gives notice of its intention to participate in, and provide comments on the proposed changes to codes and rules as set out in the December 18, 2018 Notice of Hearing.

**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 that pay regulated electricity and natural gas rates and are potentially impacted by any proposed amendments to codes and rules.
8. 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".
9. 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 London Hydro and Union Gas. As such, the LPMA submits that it is eligible for a cost award under Section 3.03.
10. 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, 2018, which can be found on the Board's website, here:

<http://www.ontarioenergyboard.ca/OEB/Industry/Regulatory+Proceedings/Applications+Before+the+Board/Annual+Filings+-+Frequent+Intervenors>

**Communications**

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

Mr. Randy Aiken  
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Chatham, Ontario, N7L 4J6

Telephone: 519-351-8624  
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Yours very truly,

*Randy Aiken*

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