

# *Aiken & Associates*

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Aug. 14, 2019

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-2019-0207 – Distributed Energy Resources Connection Review Initiative -  
Notice of Intervention and Cost Eligibility Request of London Property  
Management Association**

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

Sincerely,

*Randy Aiken*

Randy Aiken  
Aiken & Associates

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**NOTICE OF INTERVENTION AND 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 distribution service from London Hydro. The membership of the LPMA wishes to intervene in this initiative because the issues, including connection cost responsibility matters, connection process timelines, technical connection requirements and the need for consistency across electric distributors with regards to these matters that are to be raised in the initiative are likely to result in impacts to regulated rates and/or costs and the ability of members to benefit from the use of distributed energy resources. The views of these businesses should be considered as part of this initiative.

4. LPMA intends to actively participate in this initiative for the purpose of ensuring the record is complete and to make submissions on the issues which may be raised, including those noted above and any other issues that may arise through the initiative.

**Intervention**

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

6. LPMA hereby requests that the Board and all other parties provide it with electronic copies of all material related to the initiative.

**Cost Eligibility**

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

8. As indicated above, the LPMA is comprised of small and mid-sized commercial customers that pay regulated distribution rates. Its members have a substantial interest in this initiative, including all issues that affect costs to be paid by them and the potential benefits from distributed energy resources.

9. 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".

10. 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 electricity services. As such, the LPMA submits that it is eligible for a cost award under Section 3.03.

11. 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>

12. LPMA does not have access to any other source of funding to participate in this initiative.

### **Communications**

13. LPMA request that the Board and other parties provide its consultant, Mr. Randy Aiken, with electronic copies of all relevant materials at the e-mail address noted below.

14. All communications related to this Notice of Intervention and to this initiative 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

Yours very truly,

*Randy Aiken*

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