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June 5, 2020

Christine E. Long
Registrar and Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Long,

RE: EB-2020-0152 - London Property Management Association Notice of Intervention and Request for Cost Eligibility Determination – Consultation on Implementing the Process for Enabling Customers to Opt Out of Time-of-Use Pricing

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 services from regulated electricity distributors as well as other regulated entities. The membership of the LPMA wishes to intervene in this consultation because the issues, methodologies and impacts raised in the application associated with the process for enabling customers to opt out of time-of-use pricing have a direct impact on the LPMA members. LPMA is concerned with the communication of the options available to its members and adequate information being available to them to make appropriate decisions. The views and concerns of these businesses should be considered in this proceeding.
4. LPMA intends to actively participate in this consultation for the purpose of ensuring the record in this proceeding is complete and to make submissions that may be raised in the application, including all aspects associated with the implementation of the opt-out mechanism including timing, frequency, communication and information availability and any other issues that may be raised in the consultation.
5. Due to the expected timing of the working group meetings, LPMA’s consultant will not be able to participate in the working groups. LPMA suggests the meeting minutes be published on the OEB’s website in a timely manner so that all interested parties are kept informed of developments in a timely manner.

Intervention

6. LPMA hereby gives notice of its intention to intervene in, and participate in the consultation.

7. LPMA reserves the right to be heard, to appear by or with counsel and/or consultant, to ask questions and make submissions on all matters raised during the consultation that may relate to its interests in all phases of the consultation.

8. LPMA hereby requests that the Board and all other parties involved provide it with copies of all materials and correspondence related to the consultation.

Cost Eligibility

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

10. As indicated above, the LPMA is comprised of residential and small and mid sized commercial customers of regulated electricity distributors that take regulated services in the London area. Its members have a substantial interest in these proceedings, including all issues that affect rates and services available to them.

11. 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".

12. 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 regulated electricity distributors. As such, the LPMA submits that it is eligible for a cost award under Section 3.03.

13. 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:

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

14. LPMA does not have access to any other funding to enable it to participate in this consultation.

Communications

15. All communications related to this Notice of Intervention and to this consultation should be directed to LPMA's consultant, who has more than 30 years of experience in the regulated electricity and natural gas industries in Ontario. Contact details are as follows:

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Yours very truly,

Randy Aiken

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