

Aiken & Associates

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

Phone: (519) 351-8624
E-mail: randy.aiken@sympatico.ca

February 1, 2021

Christine E. Long
Registrar
Ontario Energy Board
2300 Yonge Street
Toronto, ON M4P 1E4

Dear Ms. Long,

**RE: EB-2020-0290 - Notice of Intervention and Cost Eligibility Request of London
Property Management Association for Ontario Power Generation 2022-2026
Payments**

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

Sincerely,

Randy Aiken
Aiken & Associates

cc: OPG Regulatory Affairs opgregaffairs@opg.com

**NOTICE OF INTERVENTION AND COST ELIGIBILITY REQUEST
OF
LONDON PROPERTY MANAGEMENT ASSOCIATION**

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 a number of distributors that includes the pass through of generation costs related to OPG's nuclear and hydroelectric generating facilities. The membership of the LPMA wishes to intervene in this proceeding because the issues, methodologies and impacts raised in the proceeding are likely to result in changes to regulated rates and/or costs. The views of these businesses should be considered in this proceeding.
4. LPMA intends to actively participate in this proceeding for the purpose of ensuring the record in this proceeding is complete and to make submissions on the issues which are raised in the application.

Intervention

5. LPMA hereby gives notice of its intention to intervene in, and appear at, all phases of the proceeding.
6. LPMA hereby requests that OPG, the Board and all other parties provide it with hardcopies of all evidence related to the proceeding.

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 midsized commercial customers that pay regulated generation costs that are provided by OPG. Its members have a substantial interest in this proceeding, including all issues that affect costs to be paid by them.
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 services provided by OPG. 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 filing can be found on the Board's website, at:

<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:

Mr. Randy Aiken
Aiken & Associates
578 McNaughton Ave. West
Chatham, Ontario, N7L 4J6

Telephone: 519-351-8624
E-mail: randy.aiken@sympatico.ca