

Aiken & Associates

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Feb. 22, 2021

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

Dear Ms. Long,

RE: EB-2021-0004 – Consultation to Review Annual Update to Five-Year Natural Gas Supply Plans - 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 distribution service from Enbridge Gas Inc. (formerly Union Gas Limited). The membership of the LPMA wishes to intervene in this consultation process because the issues, including cost-effectiveness, performance measurement and accountability, reliability and security of supply, and other issues raised in the consultation are likely to result in impacts to regulated rates and/or costs and the quality of service to its members. The views 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 consultation is complete by asking questions, attending the stakeholder conference and providing written comments on the issues which may be identified in the consultation, including those noted above and any other issues that may arise through the consultation.

Intervention

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

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

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 midsize commercial customers that pay regulated distribution rates. 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 Enbridge Gas Inc. 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>

Communications

12. 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.

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

Mr. Randy Aiken
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Yours very truly,

Randy Aiken
Aiken & Associates

c.c. EGI Regulatory Affairs