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July 26, 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-2021-0110 - London Property Management Association – Hydro One Pre-Application Stakeholder Conference - Notice of Attendance and Request for Cost Eligibility Determination

Notice of Attendance

1. As per the Ontario Energy Board (“OEB”) letter re Hydro One Networks Inc. 2023-2027 Joint Rate Application Proceeding Pre-Application Stakeholder Conference dated July 23, 2021, the London Property Management Association (“LPMA”) intends to seek intervenor status in this Hydro One proceeding and intends to participate in the OEB stakeholder session. LPMA is requesting a determination of cost eligibility for attendance at this stakeholder session.

Statement of Interest

2. 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.

3. 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.

4. LPMA members receive regulated electricity service from a number of distributors that includes the pass through of transmission related costs related to Hydro One Networks. 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.

5. 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, including the appropriate balances in the deferral and variance accounts, their allocation to the various rate classes and any other issues that may be raised in the application or arise throughout the process.

Intervention

6. LPMA hereby gives notice of its intention to intervene in, and appear at, all phases of the public hearing.
7. LPMA reserves the right to be heard, to appear by or with counsel and/or consultant, to ask interrogatories and to cross-examine on all matters raised during the proceeding that may relate to its interests, to adduce evidence on specific matters of its choice related to the Applications, and to present argument.
8. LPMA hereby requests that the Board, Hydro One Networks, and all other parties provide it with copies of all evidence and correspondence related to the Application and the Hearing.

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 small and mid sized commercial customers that receive regulated services from Hydro One Networks. 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 Hydro One Networks. 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 and can be found on the Board's website, here:

<https://www.oeb.ca/industry/applications-oeb/intervenor-information/annual-filings-frequent-intervenors>
14. LPMA confirms that it does not have access to any other funding and without eligibility for a cost award would not be able to participate in this proceeding.
15. LPMA confirms that Mr. Randy Aiken will be its consultant for this proceeding. Mr. Aiken has more than 30 years of experience in the regulation of the natural gas and electricity sectors in Ontario.

Communications

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

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Yours very truly,

Randy Aiken
Aiken & Associates

c.c. Hydro One, Regulatory Affairs