

# *Aiken & Associates*

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August 9, 2021

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

Dear Ms. Long,

**RE: EB-2021-0106 - London Property Management Association Notice of Intervention and Request for Cost Eligibility Determination – Updating the CDM Guidelines for Electricity Distributors – Request for Comments**

**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 distribution services from London Hydro under a number of regulated rates. The membership of the LPMA wishes to intervene in this proceeding because the issues, methodologies, and impacts raised in the OEB staff discussion paper associated may result in changes to rates, costs and/or services available to LPMA members. The views and concerns of these businesses should be considered in this proceeding.
4. LPMA intends to provide comments on the OEB staff discussion paper to ensure the record in this proceeding is complete and to provide comments on the issues which are raised in the discussion paper and any other issues that may be raised in relation to the discussion paper.

**Intervention**

5. LPMA hereby gives notice of its intention to intervene in, and appear at, all phases of the proceeding.
6. LPMA reserves the right to be heard, to appear by or with counsel and/or consultant and to provide comments on the OEB staff discussion paper and any other component of the review of the CDM guidelines that may arise.

7. LPMA hereby requests that the Board and all other parties provide it with copies of all material and correspondence related to the Application and the Hearing.

### **Cost Eligibility**

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

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

10. 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".

11. The Board has found the LPMA to be eligible for cost awards in numerous natural gas, electricity and policy 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 electricity distributors and transmitters. As such, the LPMA submits that it is eligible for a cost award under Section 3.03.

12. 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>

### **Communications**

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

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Yours very truly,

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