

Aiken & Associates

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August 16, 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-2021-0212 - London Property Management Association Notice of Intervention and Request for Cost Eligibility Determination – Review of Inflation Factors Used to Set Rates for the Year 2022

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. They also receive regulated transmission services from Hydro One. In addition, they receive regulated natural gas distribution services from Enbridge Gas Inc. under a number of regulated rates. The membership of the LPMA wishes to intervene in this proceeding because the setting of the inflation rate used to set rates for regulated services will impacts costs to LPMA members. The views and concerns of these businesses should be considered in this proceeding.
4. LPMA intends to provide comments on the alternatives provided in the Ontario Energy Board Notice and/or provide other suggestions for the Board’s consideration in the setting of the inflation rate.

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 potential alternatives to setting the inflation rate for 2022 as well as any other issues or methodologies 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, Hydro One and Enbridge Gas Inc. 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 and natural gas 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,

Randy Aiken
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