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April 6, 2021

Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Marconi,

RE: EB-2022-0011 – Framework for Review of Intervenor Processes and Cost Awards – Participation 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 are generally small and midsized commercial customers that pay regulated distribution rates. In particular, LPMA members receive regulated electricity distribution services from London Hydro under a number of rate classes. They also receive regulated transmission services from Hydro One and purchase power generated by Ontario Power Generation. In addition, they receive regulated natural gas distribution services from Enbridge Gas Inc. under a number of rate classes. The membership of the LPMA wishes to participate in this framework review because of the potential impact to LPMA members on their ability to participate effectively in future regulatory hearings and processes. The views and concerns of these businesses should be considered in this review.

4. LPMA intends to actively participate in this review to ensure its views on the issues are known and to address the questions identified by the Ontario Energy Board in its Framework Review.

Participation

5. LPMA hereby gives notice of its intention to participate in the framework review.

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

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 mid-sized commercial customers that pay regulated distribution rates. Its members have a substantial interest in this review, including their ability to effectively participate in proceedings and consultations that impact the rates they pay and the services they receive regulated entities.

9. LPMA does not have access to any other source of funds that would allow it to participate in OEB proceedings and/or consultations without access to cost award eligibility.

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 and electricity proceedings before the Board. As indicated above, the LPMA is requesting cost eligibility on behalf of its members which are consumers (i.e. ratepayers) in relation to regulated services provided by a number of regulated distributors, transmitters and generators. 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 in March, 2022, 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

13. 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.

14. All communications related to this Participation and Cost Eligibility Request and to this review should be directed to:

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Yours very truly,

Randy Aiken
Aiken & Associates