

# *Aiken & Associates*

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February 2, 2023

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

Dear Ms. Marconi,

**RE: EB-2023-0003 - London Property Management Association Notice of Intervention and Request for Cost Eligibility Determination – OEB Engagement on Distributor Resilience, Responsiveness and Cost Efficiency**

**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 electricity service from London Hydro Inc. The membership of the LPMA wishes to participate in this consultation because the issues related to distributor resilience, responsiveness and cost efficiency have significant impacts on LPMA members.
4. LPMA intends to actively participate in this consultation to ensure that the views and concerns of these businesses are considered in this consultation.

**Intervention**

5. LPMA hereby gives notice of its intention to intervene in, and appear at, all phases of the consultation.
6. LPMA reserves the right to be heard, to appear by or with counsel and/or consultant, to participate with respect to all matters raised during the consultation that may relate to its interests.
7. LPMA hereby requests that the Board and all other parties provide it with copies of all material and correspondence related to the consultation.

## **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 distribution services from London Hydro Inc. Its members have a substantial interest in this consultation, including all matters that affect rates and the quality of service 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 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 London Hydro Inc. As such, the LPMA submits that it is eligible for a cost award under Section 3.03. LPMA notes that it does not have access to any other funding to participate in this consultation.
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 consultation should be directed to:

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Yours very truly,

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