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May 13, 2024

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

Dear Ms. Marconi,

RE: EB-2024-0111 - London Property Management Association Comments on Draft Issues List

I am writing on behalf of the London Property Management Association ("LPMA") to make submissions on the proposed issues list, pursuant to *Procedural Order #1* dated April 26, 2024. In that procedural order, the Ontario Energy Board ("OEB") asked parties to comment on three items: the draft issues list; whether the issues list should reflect the issues around Enbridge Sustain raised in the Heating, Refrigeration and Air Conditioning Institute of Canada's ("HRAI") intervention request; and whether the issues list should reflect the issues raised in the Environmental ("ED") motion.

I have read the comments on the issues list filed by Enbridge Gas Inc. ("EGI") dated May 6, 2024, along with submissions from HRAI and ED.

LPMA generally supports the issues found in the draft issues list included in *Procedural Order #1*.

LPMA has a number of submissions with respect to the proposed changes to the issues list proposed by EGI in their May 6, 2024 submissions.

LPMA is not opposed to EGI's proposal with respect to the Dawn to Corunna Project, which was deferred from Phase 1. Specifically, LPMA does not oppose the splitting of issue #12 into two parts: the first being the allocation of the capital costs between utility and non-utility storage operations, and secondly, the project costs to be included in rate base.

LPMA supports EGI's proposed changes to issue #3, through the changes and additions that would more clearly, in LPMA's view, focus the proposed incremental capital funding issue on the three sub-issues being the proposed inclusion of overhead costs in ICM amounts, the opportunity to request ICM funding in leave to construct applications and the proposed different ICM treatment for asset life extension projects.

LPMA agrees with EGI that an issue related to the implementation of any changes to 2024 interim rates that result from decisions in phase 2 should be added to the issues list. Similarly, LPMA agrees with EGI that the addition of an issue related to the approval and implementation of 2025 rates as soon as possible after a phase 2 decision on the IRM is complete is appropriate and would support regulatory efficiency.

With respect to the EGI proposal related to scorecard performance metrics, including the proposed change to the calculation of the meter reading performance measurement, LPMA has two submissions. First it should be clear that this issue relates to all performance metrics and whether the current targets remain appropriate. Second, LPMA submits that a new performance metric should be established that tracks inaccessible meters that would record the percentage and absolute number of inaccessible meters, along with a breakdown of why the meters were inaccessible.

EGI has proposed an additional issue as follows: *“Is the proposal to establish the OEB Cost Assessment Variance Account and OEB Directive Deferral Account appropriate?”*. LPMA opposes the addition of this account. OM&A costs for 2024 have been included in base rates for 2024 as part of the phase 1 decision. OEB cost assessment costs are included in base rates and EGI should manage the costs as part of their overall management of costs under their proposed IRM without the protection of a variance account. With regards to the OEB Directive Deferral Account, EGI should request such an account when, and if, the need arises, not as part of phase 2 of this application.

With respect to issue #20, EGI has proposed wording changes with respect to the site restoration costs, specifically related to the long-term forecast of the total funds required. LPMA supports the change as proposed by EGI as there does not appear to be any likelihood as part of this proceeding of having new updated long-term forecasts.

EGI proposes the elimination of issue #18, related to the “safe bet” proposals related to energy transition capital spending in the IRM term. LPMA does not support the removal of this issue, but submits that the issue should be more narrowly defined, so as to avoid re-examination of energy transition and capital spending issues that were dealt with in detail in phase 1.

Finally, LPMA has reviewed the submissions of HRAI and ED on their specific concerns and issues and supports those submissions.

Yours very truly,

Randy Aiken
Aiken & Associates

c.c. EGI, Regulatory Affairs
Parties to EB-2024-0111