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April 1, 2010

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
Suite 2700
Toronto, Ontario, M4P 1E4

Dear Ms. Walli:

Re: EB-2010-0038 – Comments of the LPMA

This letter is in response to the Board's March 10, 2010 letter related to the above noted proceeding. Three paper copies have been provided to the Board and an electronic version has been filed through the Board's web portal at www.errr.oeb.gov.on.ca.

These are the comments of the London Property Management Association ("LPMA") related to the proposed amendments to the Distribution System Code related to Section 3 of the Code. Specifically, the proposed amendments deal with the alternative bid option for connecting customers.

LPMA is generally satisfied with the proposed amendments as shown in Attachment A to the Board's letter. LPMA believes the changes, as proposed, provide greater clarity related to the application of the alternative bid provisions.

LPMA does, however, offer one further change to that proposed for further clarity. Item 6 in Attachment A deals with Section 3.2.16 of the Distribution System Code. LPMA's comments revolve around paragraph (d) and the changes proposed.

Based on the proposed changes to Section 3.2.16, paragraph (d) would read as follows:

"require the customer to ensure that the work that is subject to alternative bid is done in accordance with the distributor's planning and the development of specifications for the design, engineering and layout of the expansion;"

LPMA submits that this wording may lead to some confusion as to whether or not this refers to the distributor's "development of specifications for the design, engineering and lay of the expansions". The inclusion of the word "the" immediately before "development" makes it somewhat unclear whether or not it is the distributor's development that is being referred to.

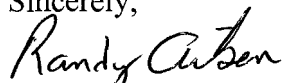
For added clarity LPMA suggests the following wording:

"require the customer to ensure that the work that is subject to alternative bid is done in accordance with both the distributor's planning and the distributor's development of specifications for the design, engineering and layout of the expansion;"

This change would add additional clarity and avoid potential interpretation disagreements in the future.

If you require any further information or clarification, please contact me.

Sincerely,


Randy Aiken
Aiken & Associates