

# *Aiken & Associates*

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May 9, 2019

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4

Dear Ms. Walli,

**RE: EB-2019-0120- Notice of Intervention and Cost Eligibility Request of London Property Management Association**

Please find attached a Notice of Intervention and Request for Cost Eligibility of the London Property Management Association ("LPMA") in the above noted application.

Sincerely,

*Randy Aiken*

Randy Aiken  
Aiken & Associates

cc: Linda Gibbons, Hydro One

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**NOTICE OF INTERVENTION AND COST ELIGIBILITY REQUEST  
OF  
LONDON PROPERTY MANAGEMENT ASSOCIATION**

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**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 service from a number of distributors that includes the pass through of transmission related costs related to Hydro One Networks Inc. The membership of the LPMA wishes to intervene in this proceeding because the issues, allocation methodologies and impacts raised in the proceeding are likely to result in changes to regulated rates and/or costs. The views of these businesses should be considered in this proceeding.

4. LPMA intends to actively participate in this proceeding for the purpose of ensuring the record in this proceeding is complete and to make submissions on the issues which are raised in the application, including the balance and clearance of deferral and variance accounts and the application of the proposed revenue cap.

**Intervention**

5. LPMA hereby gives notice of its intention to intervene in, and appear at, all phases of the proceeding.

6. LPMA hereby requests that Hydro One, the Board and all other parties provide it with hardcopies of all evidence related to the proceeding.

**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 transmission rates which are primarily based on costs for Hydro One Networks. Its members have a substantial interest in this proceeding, including all issues that affect costs to be paid by them.

9. 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".

10. 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 Hydro One. As such, the LPMA submits that it is eligible for a cost award under Section 3.03. In addition, LPMA was an intervenor in the original EB-2013-0421 proceeding where it was found to be eligible for a cost award.

11. 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 June, 2018, 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**

12. LPMA request that Hydro One and other parties provide its consultant, Mr. Randy Aiken, with electronic copies its pre-filed evidence, other supporting materials, and interrogatory responses at the e-mail address noted below.

13. All communications related to this Notice of Intervention and to this proceeding should be directed to:

Mr. Randy Aiken  
Aiken & Associates  
578 McNaughton Ave. West  
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Telephone: 519-351-8624  
E-mail: randy.aiken@sympatico.ca

Yours very truly,

*Randy Aiken*

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