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June 18, 2020

Christine E. Long
Registrar and Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Long,

**RE: EB-2020-0133 - London Property Management Association Reply
Comments on Draft Issues List – Consultation on the Deferral Account –
Impacts Arising from the COVID-19 Emergency**

These are the reply comments of the London Property Management Association (“LPMA”) with respect comments filed on June 11, 2020 related to the draft issues list prepared by Ontario Energy Board (“Board”) staff and included in Appendix A to the Board’s May 14, 2020 letter that initiated the consultation in the above noted matter.

LPMA supports the comments of many intervenors representing ratepayer groups related to cost reductions and new revenue sources. For example, the School Energy Coalition (“SEC”) has proposed the inclusion of an issue related to operational mitigation. As indicated by SEC, as the utilities expect lower revenues this year and into the future because of the economic impact of the pandemic, they should be required to mitigate those losses by reducing costs wherever possible. A clear example of a distributor doing this is Enbridge Gas Inc. (“EGI”). EGI has indicated that it is cutting its capital and operational costs at all of its sites across the province. Employees are being offered buyout packages, early retirement, severance, educational or personal leaves of absence or part-time work. In addition, non-union wages are being cut, including a 15% salary cut to members of the Board of Directors and Chief Executive Officer. This information can be found at <https://blackburnnews.com/chatham/chatham-news/2020/06/12/enbridge-cutting-back-across-ontario/>.

LPMA submits that this is exactly the type of operational and capital mitigation that needs to be included in the issues list. As LPMA noted in its original submissions the actions taken or not taken by utilities in order to reduce costs to

offset other cost increases, such as bad debts, and lost revenues needs to be accounted for.

Intervenors representing ratepayer groups have also raised the issue of increased revenues (such as in the residential rate class) and other revenues such as assistance through government programs as an item that should be included in the issues list. LPMA agrees with these submissions and noted that the assistance and the allocation of the assistance is fluid at the current time. This assistance includes the Ontario Government's COVID-19 Energy Assistance Program ("CEAP), which provides utilities in the province with \$9 million to support consumers struggling to pay their energy bill and \$8 million to support small businesses struggling with the payments as a result of the COVID emergency.

The amount and type of assistance may be enhanced in the future and any such benefits needs to be included in any impact calculation on the utilities.

LPMA has had the opportunity to see the draft reply comments of both SEC and AMPCO/IGUA and supports those submissions.

Yours very truly,
Randy Aiken

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