

May 15, 2006

Board Secretary
Ontario Energy Board
27th Floor
2300 Yonge Street
Toronto, ON, M4P 1E4

Dear Sir:

**Re: Multi-Year Electricity Distribution Rate Setting Plan
Cost of Capital (EB-2006-0088) and 2nd Generation Incentive
Regulation Mechanism (EB-2006-0089)
Interest of the London Property Management Association and Request for
Cost Award**

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 350 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 local utilities in the London area. LPMA wishes to participate in the portion of this project that relates to the development of the two proposed Codes.

Request for an Award of Costs

4. LPMA is requesting that the Board find that it is eligible for an award of costs for its participation in this process. As per Section 4.01 of the Practice Directions on Cost Awards, dated February, 2003, LPMA believes that it is eligible for an award of costs based on the Board’s eligibility criteria and requests the Board’s determination of such cost eligibility.
5. As indicated above, the LPMA is comprised of small and mid-sized commercial customers of regulated electricity distributors that take regulated services from these

distributors. Its members have a substantial interest in this review, including all issues that affect rates available to them.

6. The Board's cost eligibility criteria, found in Section 3 of the Practice Directions on Cost Awards dated February, 2003 includes a number of criteria related to the LPMA. Specifically, Section 3.03 states that a party is eligible to apply for a cost award where the party primarily represents the direct interests of consumers (e.g. ratepayers) in relation to regulated services. As indicated above, the LPMA is intervening on behalf of its members which are consumers (e.g. ratepayers) in relation to regulated services provided by regulated distributors. As such, the LPMA submits that it is eligible for a cost award under Section 3.03.

7. LPMA notes that it has been found to be eligible for an award of costs in London Hydro and Union Gas rate applications, the Smart Meter Initiative, the 2006 Electricity Distribution Rates process and other similar processes before the Board.

Contact Information

8. All communications related to this process should be directed to:

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Telephone: 519-351-8624
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9. If you require any further information, please contact me.

Sincerely,

Randy Aiken

Randy Aiken
Aiken & Associates