

July 7, 2005

Mr. John Zych  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street  
26<sup>th</sup> Floor  
Toronto, Ontario, M4P 1E4

Dear Mr. Zych:

**Re: Request for Cost Eligibility Determination for the London Property Management Association – Cost Allocation Review (EB-2005-0317)**

This letter is the formal request for cost eligibility determination for the London Property Management Association (LPMA) in the Cost Allocation Review (EB-2005-0317), and is in response to the Board's letter to Licensed Electricity Distributors and Electricity Stakeholders dated June 24, 2005.

**The LPMA**

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. LPMA is made up of approximately 325 members ranging in size 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 LPMA members own or manage more than 35,000 rental units in the London area

**Cost Eligibility**

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. In particular, LPMA "primarily represents the direct interests of consumers (e.g. ratepayers) in relation to regulated services".

The Board has found the LPMA to be eligible for cost awards in numerous natural gas and electricity proceedings before the Board.

LPMA represents the interests of small to medium to large commercial customers that take service from a number of electric utilities in and around the London area. These customers are served primarily under General Service <50 kW and general service >50 kW rates. The issues that will be dealt with in the Cost Allocation Review have the potential to have significant impacts on rates paid by the consumers to their local utilities

for distribution service. LPMA's interest in this review lies in a view that all costs should be allocated fairly, justly and as accurately as possible among the various rate classes. A commercial viewpoint will complement the views of residential and industrial customers.

As a non-profit organization, LPMA does not have access to any other funding sources. LPMA relies on the cost awards it receives from the Board to effectively participate in, and assist the Board, in these regulatory processes.

LPMA is requesting that the Board determine that the LPMA is eligible for a cost award for all four stages of the consultation process: technical advisory team, technical workshops, written submissions on proposed OEB cost allocation principles and methodologies; and written submissions on proposed OEB filing requirements.

As has been the practice in past proceedings, the LPMA will work with parties representing the same class of users to communicate and co-ordinate their participation. Further, LPMA will work with all parties throughout the process to ensure a complete and comprehensive review is accomplished.

### **Participation in the Technical Advisory Team**

As part of the June 25, 2005 letter, the Board indicated that if a stakeholder wished to nominate someone for participation in the Technical Advisory Team, a summary of the relevant professional experience and training of that person must be provided.

LPMA would like to nominate Mr. Randy Aiken, Aiken & Associates, for participation in the Technical Advisory Team. A brief summary of his relevant professional experience and training are attached as Appendix A to this letter.

If you require any further information or clarification, please do not hesitate to contact me.

Sincerely,

Randy Aiken  
Aiken & Associates

cc. Paul Cappa, LPMA (e-mail)

Attachment

## APPENDIX A

### PROFESIONAL EXPERIENCE AND TRAINING

#### RANDY AIKEN – AIKEN & ASSOCIATES

#### UNIVERSITY EDUCATION

1983 M.A. (Economics), University of Waterloo  
1981 B.Math. (Honours Statistics with Economics), University of Waterloo

#### PROFESSIONAL QUALIFICATIONS

1994 Certificate in Financial Planning

#### CAREER HISTORY

1992 - Present **AIKEN & ASSOCIATES, Chatham, Ontario**

\* Leading a team of public utility professionals providing services in the areas of utility economics, finance, regulation and litigation.

\* Providing consulting services and expertise in the areas of public utility regulatory case management, cost of service regulation (including models), performance based regulation, litigation support, evidence preparation, sales and revenue forecasting (including models), economic analysis, O & M budget analysis, capital project analysis (including financial analysis models), cost allocation (including models), rate design and regulatory support.

\* Provide expert testimony on behalf of clients before the Ontario Energy Board.

\* Provide cross-examination of expert witnesses on behalf of clients before the OEB.

1986 - 1992 **UNION GAS LIMITED, Chatham, Ontario**  
Senior Economist 1987-1992  
Supervisor Forecasts & Market Statistics 1986-1987

1984 - 1986 **CHASE ECONOMETRICS (now Global Insight), Toronto, Ontario**  
Economist

#### APPEARANCES BEFORE ONTARIO ENERGY BOARD

##### As a Witness

RP-2004-0167/EB-2005-0188 – Rehearing Motion – Natural Resource Gas Limited  
RP-2004-0167 -Main Rates Case – Natural Resource Gas Ltd (Rates for 2005)  
EB-2004-0004 -Purchased Gas Commodity Variance Account Amendment  
RP-2002-0147 -Main Rates Case - Natural Resource Gas Ltd. (Rates for 2003, 2004)  
RP-2000-0023 -Distribution Rates - Hydro One Networks Inc. (on behalf of London Hydro, Ottawa Hydro, St. Catharines Hydro, Oshawa PUC Networks and Enersource Mississauga Hydro)  
RP-2001-0036 -Uniform Transmission Rates - Five Nations Energy Inc.  
RP-2000-0126 -Main Rates Case - Natural Resource Gas Ltd. (Rates for 2001, 2002)  
RP-1999-0031 -Main Rates Case - Natural Resource Gas Ltd. (Rates for 2000)  
E.B.R.O. 496 -Main Rates Case - Natural Resource Gas Ltd. (Rates for 1998, 1999)  
E.B.R.O. 491 -Main Rates Case - Natural Resource Gas Ltd. (Rates for 1996, 1997)  
E.B.R.O. 488 -Main Rates Case - Natural Resource Gas Ltd. (Rates for 1995)  
E.B.R.O. 480 -Main Rates Case - Natural Resource Gas Ltd. (Rates for 1993, 1994)

E.B.R.O. 470	-Main Rates Case - Union Gas Ltd.
E.B.R.O. 462	-Main Rates Case - Union Gas Ltd.
E.B.L.O. 237	-Facilities Application - Union Gas Ltd.
E.B.L.O. 234	-Facilities Application - Union Gas Ltd.
E.B.L.O. 230	-Facilities Application - Union Gas Ltd.

#### Cross-Examination & Submissions

RP-2003-0063/EB-2004-0542	– Union Gas Embedded Storage Rate
RP-2003-0063/EB-2005-0189	– Union Gas Motion
RP-2003-0063	- Union Gas Rate Case – Fiscal 2004 (on behalf of LPMA and WGSPG)
RP-2002-0158	- Review of Board's Guidelines for Setting ROE (on behalf of LPMA)
EB-2003-0056	- Quarterly Rate Adjustment Mechanism - Union Gas Ltd. (May, 2003) (on behalf of LPMA)
RP-2002-0130	- Customer Review Process (2003 Rates) - Union Gas Ltd. (on behalf of LPMA and WGSPG)
RP-2001-0029	- Customer Review Process - Union Gas Limited (on behalf of LPMA and WGSPG)
RP-1999-0017	- Unbundling & Performance Based Regulation - Union Gas Limited (On behalf of LPMA, WGSPG, MECAP)
E.B.R.O. 499	- Main Rates Case - Union Gas Limited (On behalf of WGSPG)

Mr. Aiken has testified before the Ontario Energy Board on numerous occasions as an expert witness on cost allocation and rate design matters. Mr. Aiken has designed, built and updated cost allocation, regulatory, financial, energy, and provincial and national economic forecasting models for more than twenty years. Mr. Aiken also provides expertise to clients in reviewing and understanding regulatory filings, including cost allocation filings and models.

Mr. Aiken's clients include electricity distribution companies, natural gas distribution companies, electric transmission companies, electricity generators, non-profit customer associations and legal firms.