



PUBLIC INTEREST ADVOCACY CENTRE
LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC

ONE Nicholas Street, Suite 1204, Ottawa, Ontario, Canada K1N 7B7
Tel: (613) 562-4002. Fax: (613) 562-0007. e-mail: piac@piac.ca. <http://www.piac.ca>

July 25, 2009

VIA E-MAIL

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

Dear Ms. Walli

Re: EB-2009-0180, EB-2009-0181, EB-2009-0182, EB-2009-0183
Application by 1798594 Ontario Inc. for a distribution licence;
Applications by Toronto Hydro Energy Services Inc. and
1798594 Ontario Inc. for leave to sell street lighting assets; and
Application by Toronto Hydro-Electric System Limited and
1798594 Ontario Inc. for leave to amalgamate

Notice of Intervention and Request for Costs - Vulnerable Energy Consumers Coalition (VECC)

As Counsel to the Vulnerable Energy Consumer's Coalition (VECC), and, as directed in the Board's Notice Of Application dated July 22, 2009, I hereby request that VECC be granted intervenor status and be judged eligible for costs in the above proceeding.

Interests Represented

VECC is a coalition of groups that represents the interests of those energy consumers who, because of their household income, or other distinguishing characteristic such as age, literacy, etc, have a set of concerns that may differ in kind, and, in magnitude, from those of more affluent residential consumers as well as commercial and industrial consumers. The Vulnerable Energy Consumers Coalition (VECC) is currently comprised of the Ontario Coalition of Senior Citizens (OCSCO), and the Federation of Metro Tenants Association.

OCSCO is itself a coalition of over 120 senior groups, as well as individual members, across Ontario. OCSCO represents the concerns of over 500,000 senior citizens through its group and individual memberships. OCSCO's objective is to improve the quality of life for Ontario Seniors.

The Federation of the Metro Tenants Association is a non-profit corporation composed of over ninety-two affiliated tenants associations, individual tenants, housing organizations, and members of non-profit housing co-ops.

Although the organization is not itself a member of VECC, the Public Interest Advocacy Centre (PIAC) in Ottawa assists in the representation of the interests of vulnerable consumers by ensuring the availability of competent representation and advice to the VECC intervention.

Issues of Specific Concern to VECC

As a representative of ratepayers and tenants living in Toronto Hydro's service territory VECC has been involved in regulatory matters related to THESL's rates for several years. Although the Application indicates no impact on rates, VECC considers that the Application raises a number of issues that may have cost consequences in future years and may directly affect VECC's constituency. Specifically, the Application appears to raise issues such as

- a) whether Streetlighting is properly a distribution asset,
- b) the transfer price,
- c) asset condition and
- d) future capital and operating costs.

I would appreciate all communications be directed to Counsel:

Michael Buonaguro
34 King Street East, Suite 1102, Toronto, Ontario, M5C2X8.
mbuonaguro@piac.ca

and our consultants:

Mr. Bill Harper Senior Consultant
Dr. Roger Higgin, Managing Associate,
Econalysis Consulting Services,
34 King Street East, Suite 1102, Toronto, Ontario, M5C2X8.
bharper@econalysis.ca
rhiggin@econalysis.ca

VECC has been judged in the past to be eligible for recovery of its legitimate costs, including proceedings related to THESL, and respectfully requests that it be deemed eligible for its costs in this proceeding.

Yours truly,

Original signed

Michael Buonaguro
Counsel for VECC

Cc: Toronto Hydro Energy System Limited
J. Mark Rodger Counsel
P. Sardana