



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

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Michael Janigan  
Counsel for VECC  
(613) 562-4002 x26

April 21, 2015

**VIA MAIL and E-MAIL**

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

Dear Ms. Walli:

**Re: Vulnerable Energy Consumers Coalition (VECC)  
EB-2014-0198 Residential Customer Bill Practices and Performance  
Cost Awards**

VECC has participated in the above noted proceeding having filed two submissions. In its initial submission made on October 9, 2014 we explained that we had inadvertently failed to meet the date set for consideration of costs awards and asked that the Board grant us our prudently incurred costs (up the maximum set by the Board).

On April 21, 2015 we were informed by Board Staff that though our request had been noted there was an expectation we would file further information in order to support our request. We were not aware of this expectation.

Below we have attached the information provided by VECC in similar policy proceedings (for example. EB-2014-0189, EB-2014-0227, EB-2014-0158 and EB-2015-0006). As the Board knows VECC is a frequent intervenor in Board proceedings. As per Our current Annual Filing can be found on the Board's website at:

[http://www.ontarioenergyboard.ca/oeb/\\_Documents/Intervenor\\_Filings/VECC\\_2014\\_annual\\_intervenor\\_filing\\_20140605.pdf](http://www.ontarioenergyboard.ca/oeb/_Documents/Intervenor_Filings/VECC_2014_annual_intervenor_filing_20140605.pdf)

We ask that the Board consider our request granting us costs in these proceedings as we have acted responsibly. We apologize for any inconvenience due to this misunderstanding.

Yours truly,



Michael Janigan  
Counsel for VECC

cc: Mr. Vince Mazzone, Ontario Energy Board  
e-mail: [vince.mazzone@ontarioenergyboard.ca](mailto:vince.mazzone@ontarioenergyboard.ca)

**ONTARIO ENERGY BOARD**

**Electricity and Natural Gas Distributors' Residential Customer Bill  
Practices and Performance**

To: Ms. Kirsten Walli  
Board Secretary

And to: Ms. Vince Mazzone, Ontario Energy Board

1. The Vulnerable Energy Consumers Coalition (VECC) hereby expresses its interest in commenting on above Board policy initiative. VECC consists of the following organizations:

- (a) The Federation of Metro Tenants Association (FTMA)
- (b) The Ontario Coalition of Senior Citizens' Organizations (OCSCO)

2. The Federation of the Metro Tenants Association (the "FTMA") 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. In addition to encouraging the organization of tenants and the promotion of decent and affordable housing, the Federation provides general information, advice, and assistance to tenants. The address is:

500-27 Carlton Street  
Toronto, ON  
M5B 1L2

3. The Ontario Coalition of Senior Citizens' Organizations ("OCSCO") is a coalition of over 160 senior groups as well as individual members across Ontario. OCSCO represents the concerns of over 500,000 senior citizens through its group and individual members. OCSCO's mission is to improve the quality of life for Ontario's seniors. OCSCO's address is:

333 Wilson Avenue, Suite 406  
Toronto, ON  
M3H 1T2

4. The coalition of the FMTA and OCSCO under the name VECC has the specific mandate of intervening in proceedings to advocate on behalf of the interests of Ontario's vulnerable consumers with respect to energy issues, primarily through intervention in regulatory proceedings at the Ontario Energy Board.
5. 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 consultant support to the VECC participation.
6. VECC is a frequent intervenor in Board proceedings. Our current Annual Filing can be found on the Board's website at:  
[http://www.ontarioenergyboard.ca/oeb/\\_Documents/Intervenor\\_Filings/VECC\\_2014\\_annual\\_intervenor\\_filing\\_20140605.pdf](http://www.ontarioenergyboard.ca/oeb/_Documents/Intervenor_Filings/VECC_2014_annual_intervenor_filing_20140605.pdf)

7. The name and address of the agent authorized to receive documents on behalf of VECC is:

Mr. Michael Janigan  
Counsel  
Public Interest Advocacy Centre (PIAC)  
One Nicholas Street, Suite 1204  
Ottawa, Ontario  
K1N 7B7  
(416) 840-3907  
(613) 562-0007 (fax)  
[mjanigan@piac.ca](mailto:mjanigan@piac.ca)

8. VECC would request that all correspondence and documentation also be electronically copied to VECC's consultants:

Mark Garner (project manager)  
Econalysis Consulting Services  
34 King Street East, Suite 630  
Toronto, Ontario  
M5C 2X8  
(647) 408-4501 (office)  
(416) 348-0641 (fax)  
[markgarner@rogers.com](mailto:markgarner@rogers.com)

9. VECC has been active in the associated RRFE policy initiatives including EB-2014-0189, EB-2014-0227, EB-2014-0158 and EB-2015-0006.
10. VECC wishes to comment in order to ensure that consumer interests and in particular the interests of the low-income and vulnerable users of electricity are fully represented in the determination of future rates are reliable service at reasonable prices.
11. VECC will be requesting an award of costs for its participation in this proceeding and believes that, as a coalition representing the direct

interests of consumers, it meets the eligibility criteria set out in the Ontario Energy Board's Rules of Practice and Procedure (Section 41) and its' Practice Direction on Cost Awards (Section 3.03).

12. VECC's members do not have access to the direct funding required to retain appropriate legal and consulting support for its intervention in OEB proceedings. Accordingly VECC relies on PIAC to provide legal support and retain qualified consultants on the basis that PIAC can recover the related fees and disbursements from the Board based on the Board's Practice Direction on Cost Awards at the prevailing Cost Award Tariff.

**DATED AT TORONTO, APRIL 21, 2015**