



PUBLIC INTEREST ADVOCACY CENTRE
LE CENTRE POUR LA DÉFENSE DE L'INTÉRÊT PUBLIC

November 19, 2015

VIA EMAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
26th Floor
2300 Yonge Street
Toronto, ON
M4P 1E4

Dear Ms. Walli:

**Re: Letter of November 5, 2015 Regarding the Review of
Miscellaneous Rates and Charges (EB-2015-0304)
Vulnerable Energy Consumers Coalition (VECC)
Participation and Nomination for Pole Attachment Working Group**

As Counsel to the Vulnerable Energy Consumer's Coalition (VECC), I am writing, per the Board letter of November 5, 2015, to express VECC's interest in participating on the Pole Attachment Working Group. In this regard I'm nominating Mr. William Harper as one of the consumer group representatives to the Working Group. VECC will be requesting a cost award for its participation and that of Mr. Harper. The following sections address the interests of the constituency represented by VECC, VECC's eligibility for cost awards and Mr. Harper's relevant experience and qualifications as a Working Group participant.

- **Interests Represented and Cost Eligibility**

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.

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VECC consists of the following organizations:

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

VECC will be requesting an award of costs for its participation on the Working Group 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). VECC is a frequent intervenor in Board proceedings. More information regarding these two organizations and VECC's eligibility for cost awards can be found in its annual information filing on the Board's website at:

<http://www.ontarioenergyboard.ca/oeb/Industry/Regulatory+Proceedings/Applications+Before+the+Board/Annual+Filings+-+Frequent+Intervenors>

- **Pole Attachment Working Group Nominee – Mr. William Harper**

Mr. Harper has worked in the Ontario energy sector for over 40 years, first with the Ontario Ministry of Energy undertaking research directly related to electricity issues and subsequently, with Ontario Hydro dealing with rates, regulatory matters, including the regulation of municipal utilities' electricity rates. Since joining Econalysis Consulting Services in 2000, Mr. Harper has supported consumer groups in Ontario, Manitoba, Quebec, Saskatchewan and British Columbia on issues related to rate setting, rate design and cost allocation.

Specifically, in Ontario, Mr. Harper has participated in a number of the Board's previous Working Groups dealing with rate design and cost allocation and has been involved in the majority of OEB reviews of Ontario electricity distributors' cost of service-based rate applications since the Board issued the 2006 Distribution Rate Handbook. Most recently, Mr. Harper supported/is supporting VECC's participation in the review of Toronto Hydro's, Hydro Ottawa's and Hydro One Networks' pole attachment rate applications.

I look forward to a favorable response to this request.

Yours truly,



Michael Janigan
Counsel for VECC