



PUBLIC INTEREST ADVOCACY CENTRE  
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July 5, 2017

VIA 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: EB-2017-0127 & EB-2017-0128 OEB Consultation: DSM Mid-Term Review  
Notice of Intervention of Vulnerable Energy Consumers Coalition (VECC)**

Please find enclosed the Notice of Intervention of VECC in the above-noted proceeding.

Yours truly,

A handwritten signature in black ink, appearing to read 'Cynthia Khoo', written in a cursive style.

Cynthia Khoo  
Counsel for VECC

**ONTARIO ENERGY BOARD (OEB)  
IN THE MATTER OF AN APPLICATION BY  
INDEPENDENT ELECTRICITY SYSTEM  
OPERATOR (IESO)  
DSM MID-TERM REVIEW  
NOTICE OF INTERVENTION  
OF THE  
VULNERABLE ENERGY CONSUMERS COALITION**

To: Ms. Kirsten Walli, Board Secretary

**IDENTITY OF THE INTERVENOR AND ITS MEMBERSHIP**

1. The Vulnerable Energy Consumers Coalition (VECC) hereby expresses its intention to intervene and participate in the above-mentioned proceeding. VECC consists of the following organizations:
  - (a) The Federation of Metro Tenants Association (FMTA)
  - (b) The Ontario Coalition of Senior Citizens' Organizations (OCSCO)
  
2. The Federation of the Metro Tenants Association (the "FMTA") 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 annual information filing can be found on the Board's website at:

<https://www.oeb.ca/industry/applications-oeb/intervenor-information/annual-filings-frequent-intervenors>

#### **INDIVIDUALS AUTHORIZED TO REPRESENT VECC IN THIS PROCEEDING**

7. VECC requests that electronic copies of the application and any further additional supporting materials be sent to the following counsel at their respective email addresses:

Cynthia Khoo  
External Counsel, Regulatory Affairs  
Public Interest Advocacy Centre (PIAC)  
1139 College Street  
Toronto, ON M6H 1B5  
604-725-5484  
[ckhoo@piac.ca](mailto:ckhoo@piac.ca)

PIAC Office: 613-562-4002 (Donna Brady) Ext. 21

8. We also request that the same be electronically copied to VECC's consultants:

Shelley Grice P.Eng.  
(project manager)  
Econalysis Consulting Services  
34 King Street East, Suite 630  
Toronto, Ontario  
M5C 2X8  
647-408-4501 (office)  
[shelley.grice@rogers.com](mailto:shelley.grice@rogers.com)

#### **GROUNDS FOR THE INTERVENTION**

9. The OEB initiated a consultation process by which the OEB will undertake the Mid-Term Review of the 2015-2020 Demand Side Management (DSM) Framework. VECC was a party to the respective 2015-2020 DSM applications of Enbridge Gas Distribution Inc.'s and Union Gas Limited. In this application, VECC is interested in the interaction between DSM programs and Cap and Trade obligations; evaluating the DSM results; and reviewing the studies prepared by or on behalf of the OEB and the utilities.

#### **INTERESTS OF THE INTEVENOR**

10. The VECC is intervening in order to ensure that consumer interests and in particular the interests of the low-income and vulnerable users of natural gas are fully represented in the determination of just and reasonable rates.

#### **INTENTION TO SEEK COST AWARDS**

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, JULY 5, 2017**