



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

May 23, 2018

VIA E-MAIL

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

Dear Ms. Walli:

Re: EB-2017-0071 – PUC Distribution Inc.
Notice of Intervention of Vulnerable Energy Consumers Coalition (VECC)

Please find enclosed the Notice of Intervention of VECC in the above-noted proceeding. We have also directed a copy of the same to the Applicant as well as their counsel.

Yours truly,

Ben Segel-Brown

Counsel for VECC

CC: PUC - Andrew Belsito, Regulatory Affairs - andrew.belsito@ssmpuc.com
Counsel - John Vellone, Borden Ladner Gervais LLP - jvellone@blg.com

**ONTARIO ENERGY BOARD
IN THE MATTER OF AN APPLICATION BY
PUC DISTRIBUTION INC.
TO RAISE ITS ELECTRICITY DISTRIBUTION RATES
EFFECTIVE MAY 1, 2018**

**NOTICE OF INTERVENTION OF THE
VULNERABLE ENERGY CONSUMERS COALITION**

To: Ms. Kirsten Walli, Board Secretary

And to: **Mr. Andrew Belsito, Rates and Regulatory Affairs Officer**

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:

Ben Segel-Brown
Counsel, Regulatory and Public Policy
Public Interest Advocacy Centre (PIAC)
One Nicholas Street, Suite 1204
Ottawa, Ontario
K1N 7B7
613- 562-4002 ext. 29
bsegel-brown@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:

Mark Garner (project manager)
Econalysis Consulting Services
34 King Street East, Suite 630
Toronto, Ontario
M5C 2X8
647-408-4501 (office)
markgarner@rogers.com

AND TO

Bill Harper
Econalysis Consulting Services
34 King Street East, Suite 630
Toronto, Ontario
M5C 2X8
416-348-0193 (office)
bharper@econalysis.ca

GROUNDS FOR THE INTERVENTION

9. PUC Distribution Inc. (“PUC” or “the Utility”) is proposing to significantly cut back on its capital spending as compared to prior years. On the other hand the Utility is proposing to include in rates an increase in Operating, Maintenance and Administration (OM&A) costs of 20% as compared to the Board approved 2013 amount. PUC is seeking to recover a revenue deficiency of \$3.7 million (gross) on a proposed revenue requirement of \$22.1 million.
10. PUC is also proposing significant changes to its Revenue to Cost Ratios increasing the burden on the residential rate class by more than 200 basis points since the last cost of service application.
11. VECC was an intervenor in PUC’s last cost of service application, EB-2012-0162.

INTERESTS OF THE INTEVENOR

12. 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

13. 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).
14. 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, MAY 23, 2018