



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

July 6, 2018

VIA E-MAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge St.
Toronto, ON

Dear Ms. Walli:

Re: EB-2018-0038
Erie Thames Powerline Corp. (EPTL) 2018 Distribution Rates
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,

John Lawford

Counsel for VECC

Graig Petit, Erie Thames Powerlines Corporation - oeb@eriethamespower.com
Scott Stoll, Aird & Berlis LLP - stoll@airdberlis.com

**ONTARIO ENERGY BOARD
IN THE MATTER OF AN APPLICATION BY**

**ERIE THAMES POWERLINE CORPORATION
APPLICATION FOR MAY 1, 2018 RATES**

**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:

John Lawford
Counsel, Regulatory and Public Policy
Public Interest Advocacy Centre (PIAC)
One Nicholas Street, Suite 1204
Ottawa, Ontario
K1N 7B7
613- 562-4002 ext. 25
lawford@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

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. VECC has been a regular intervenor in prior application of Erie Thames Powerlines (ETPL) previous rate applications including their last cost of service applications EB-2012-0121. This application is the first which has undergone the Board’s pilot “proportionate review” approach. As such VECC interests, in addition to those directly related to the application, are in the transparency and fairness of this experimental approach to rate application reviews.
10. In its Decision on the Scope of Review the delegated decision maker of the Board found the following six broad issues would proceed to full hearing:
 - 1) Rate Base
 - 2) DSP and Capital Expenditures
 - 3) Operating Costs
 - 4) Cost of Long-Term Debt, but not other areas of Cost of Capital
 - 5) Cost Allocation: Revenue-to-cost ratios and standby rate proposal
 - 6) Deferral and Variance Accounts, except LRAMVA
11. VECC intends to pursue these issues in detail and in accordance with the instruction of the Board. However, it is also our intention to review the full application so as to satisfy ourselves that no material issues have been missed in Board Staff’s scope of review. If such issues are uncovered we will inform the Board prior to the interrogatory phase and seek guidance on how (or if) to proceed prior to incurring any significant costs. We believe this course of action is in the spirit of the Board’s pilot project in this proceeding.

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 electricity are fully represented in the determination of just and reasonable rates.
13. As a regular intervenor in electricity distribution and transmission rate cases that impact low income consumers VECC is also concerned with the precedent that may be set by this application.

INTENTION TO SEEK COST AWARDS

14. 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).

15. 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 6, 2018