



PUBLIC INTEREST ADVOCACY CENTRE
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April 14, 2020

VIA E-MAIL

Christine E. Long
Registrar and Board Secretary
Ontario Energy Board
2300 Yonge Street
Toronto, ON
M4P 1E4

Dear Ms. Long:

**Re: Enbridge Gas Inc.
Ontario Energy Board File No. EB-2020-0066
Voluntary Renewable Natural Gas Program
Request for Intervention and eligibility for cost awards**

Please find attached the Notice of Intervention of VECC in the above-noted proceeding. We have also directed a copy of the same to the Applicant.

Yours truly,

John Lawford

Counsel for VECCs

Email copy:
EGI - Brandon Ott - egiregulatoryproceedings@enbridge.com

ONTARIO ENERGY BOARD

Enbridge Gas Inc. (EGI)
An application for an order or orders related to its
Voluntary Renewable Natural Gas Program;

NOTICE OF INTERVENTION
OF THE
VULNERABLE ENERGY CONSUMERS COALITION

To: Ms. Christine E. Long, Board Secretary
And to: **Brandon Ott, Technical Manager, Regulatory Applications, EGI**

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:
http://ontarioenergyboard.ca/oeb_Documents/Intervenor_Filings/VECC_2014_annual_intervenor_filing20140605.pdf

INDIVIDUALS AUTHORIZED TO REPRESENT VECC IN THIS PROCEEDING

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

John Lawford
Counsel, Regulatory and Public Policy
2-285 McLeod Street,
Ottawa, Ontario
K2P 1A1
613-562-4002 Ext. 25
jlawford@piac.ca
PIAC Office: 613-562-4002 (Donna Brady) Ext. 21

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

Mark Garner (project manager)
647 Broadway Ave.
Toronto, Ontario
M4G 2S8
647-408-4501 (office)
markgarner@rogers.com

9. To mitigate costs VECC requests only electronic copies of the materials. VECC may ask for paper copies of some or all of the materials if this become necessary at some future point. VECC requests electronic copies of the application and any additional supporting materials are sent to its representatives at their respective e-mail addresses.

GROUND FOR THE INTERVENTION

10. Enbridge Gas Inc. (Enbridge or EGI) has proposed a voluntary gas supply option (Voluntary RNG Program) that would provide customers with the opportunity to participate in EGI's purchase of renewable gas by paying a monthly charge. A fixed charge of \$2.00 per month is proposed for this service. Any avoided costs realized as a result of reduced Federal Carbon Charges are

proposed to be tracked in an OEB-approved variance Account for future disposition. VECC has represented low volume consumers of natural in numerous proceedings before the Board. The proposal has the possibility of affecting these customers.

INTERESTS OF THE INTERVENOR

11. VECC notes that the Board has previously dismissed similar proposals by regulated natural gas utilities (see for example EB-2011-0242). We also note that the sale of “green”, “environmentally friendly” or otherwise social based priced energy services are provided by market retailers (for example by Bullfrog Power). VECC’s interest is to ensure that small volume customers are treated in a fair and transparent manner. As such the marketing of any approved program is of interest to us. We are also interested in the issue of whether such offerings are appropriately offered by the regulated utility where market alternatives may exist. Should the program be approved by the Board the disposition of any benefits accruing from carbon or other externality-based credits is of interest. As well the procurement and cost of the program and its costs and the issue of the potential for cross-subsidization with other regulated services is of concern.
12. VECC intends to scrutinize all aspects of the Applicant’s proposal.

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, APRIL 14, 2020