



***PUBLIC INTEREST ADVOCACY CENTRE
LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC***

ONE Nicholas Street, Suite 1204, Ottawa, Ontario, Canada K1N 7B7

Tel: (613) 562-4002. Fax: (613) 562-0007. e-mail: piac@piac.ca. <http://www.piac.ca>

Michael Buonaguro
Counsel for VECC
(416) 767-1666

March 23, 2009

VIA MAIL and E-MAIL

Ms. Kirsten Walli
Board Secretary
P.O. Box 2319
2300 Yonge St.
Toronto, ON
M4P 1E4

Dear Ms. Walli

RE: Cost of Capital Proceeding EB-2009-0084

Further to the Board's request for comments, please find enclosed VECC's request for cost eligibility.

In addition to the use of counsel (myself) and a consultant (Bill Harper), it is VECC's intention to retain Dr. Laurence Booth to provide advice with respect to the questions posed by the Board in this consultative.

It is VECC's understanding that this consultative is of limited scope, as evidenced by the terms of the consultative. Accordingly it is VECC's expectation that Dr. Booth's retainer will be limited to provide overview advice with respect to the specific questions posed by the Board, and will not be retained to provide an expert report.

To this end VECC has consulted with other intervenor groups on the retainer of Dr. Booth to provide limited advice, and as such some or all of the groups may allocate some of the allotted hours per intervenor to cover the cost of Dr. Booth's retainer.

Again, VECC is proceeding on the assumption that the limited scope of the consultation is such that it would be inappropriate to retain and file expert evidence. If that assumption is incorrect, and the Board expects to admit expert evidence from utilities and intervenors, we respectfully ask that the Board make that known to the parties so that the intervenors can request further, separate funding from the Board to cover the costs of retaining Dr. Booth to provide expert evidence.

Yours truly,

Michael Buonaguro
Counsel for VECC
Encl.

ONTARIO ENERGY BOARD

COST OF CAPITAL PROCEEDING

NOTICE OF INTERVENTION

OF

VULNERABLE ENERGY CONSUMERS COALITION (VECC)

To: Ms. Kirsten Walli
Board Secretary

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
 - (b) The Ontario Coalition of Senior Citizens' Organizations (OCSCO)

2. The Federation of the Metro Tenants Association 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 120 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:

660 Briar Hill Avenue, Suite 207
Toronto, ON
M6B 4B7

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

Mr. Michael Buonaguro
Counsel
c/o Public Interest Advocacy Centre
34 King Street East, Suite 1102
Toronto, Ontario
M5C 2X8
(416) 767-1666 (office)
(416) 348-0641 (fax)

mbuonaguro@piac.ca

5. VECC would request that all correspondence and documentation also be copied to VECC's consultant:

Mr. Bill Harper
Econalysis Consulting Services
34 King Street East, Suite 1102
Toronto, Ontario
M5C 2X8
(416) 348--0193 (office)
(416) 348-0641 (fax)
bharper@econalysis.ca

6. VECC requests that copies of the Application and any additional supporting materials be forwarded to each of the two parties named above.
7. VECC is intervening in order to provide its comments on the Board's questions concerning Cost of Capital. VECC is a registered intervenor in the bulk of the rate applications to which the Board's cost of capital parameters apply, and accordingly has an ongoing interest in the cost of capital methodology and any adjustments or corrections to the outputs from that methodology.
8. 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).

DATED AT TORONTO, THIS 16th DAY OF MARCH 2009

Michael Buonaguro
Counsel for VECC
c/o Public Interest Advocacy Centre