



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

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May 7, 2009

VIA E-MAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
27th Floor
2300 Yonge Street
Toronto, ON
M4P 1E4

Dear Ms. Walli

**Re: EB-2008-0401 Toronto Hydro Electric System Limited
Recovery of Amounts Related to Conservation and Demand
Management Activities in the City of Toronto
Notice of Intervention and Request for Costs - Vulnerable Energy
Consumers Coalition (VECC)**

As Counsel to the Vulnerable Energy Consumer's Coalition (VECC), and, as directed in the Board's Notice Of Application dated April 8, 2009, I hereby request that VECC be granted intervenor status and be judged eligible for costs in the above proceeding.

We regret the lateness of our request which is due to pressure of other interventions and hope that the Board will grant our request.

Interests Represented

VECC is a coalition of groups that represents the interests of those energy consumers who, because of their household income, or other distinguishing characteristic such as age, literacy, etc, have a set of concerns that may differ in kind, and, in magnitude, from those of more affluent residential consumers as well as commercial and industrial consumers. The Vulnerable Energy Consumers Coalition (VECC) is currently comprised of the Ontario Coalition of Senior Citizens (OCSCO), and the Federation of Metro Tenants Association.

OCSCO is itself 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 memberships. OCSCO's objective is to improve the quality of life for Ontario Seniors.

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.

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 advice to the VECC intervention.

Issues of Specific Concern to VECC

VECC has been an active participant in OEB regulated CDM/DSM activities for many years. As a representative of ratepayers and tenants living in Toronto Hydro's service territory its constituency has also been involved in previous matters related to THESL's rates for several years. The cost consequences of the current Application are material to VECCs constituency.

I would appreciate all communications be directed to Counsel:

Michael Buonaguro
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and our consultant:

Dr. Roger Higgin, Managing Associate,
Econalysis Consulting Services,
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VECC has been judged in the past to be eligible for recovery of its legitimate costs and requests its costs in this proceeding.

Yours truly,

Original signed

Michael Buonaguro
Counsel for VECC