



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

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Michael Buonaguro  
Counsel for VECC

September 12, 2007

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
26<sup>th</sup> Floor  
2300 Yonge Street  
Toronto, ON  
M4P 1E4

Dear Ms. Walli:

**Re: Stakeholder Consultation on Electricity Distributors' Provision of  
Service and Application of Charges  
Board File No: EB-2007-0722**

**Participation and Funding Request of the Vulnerable Energy  
Consumers Coalition (VECC)**

**Intention to Participate**

**VECC's Participation**

As Counsel to the Vulnerable Energy Consumer's Coalition (VECC), I am writing, per the Board letter of September 6<sup>th</sup>, to a) indicate VECC's intention to participate in the EB-2007-0722 consultation process regarding Electricity Distributors' Provision of Service and Application of Charges; b) in VECC's intention to attend the October 18<sup>th</sup> meeting; and c) request funding for my client's participation.

**Stakeholder Working Group Participation**

**Stakeholder Meeting and Consultant Support**

I anticipate attending and representing VECC at the October 18<sup>th</sup> meeting. In addition, VECC will be retaining the consulting services of Mr. Bill Harper of

Econalysis Consulting Services to assist with the preparation of written comments. A copy of Mr. Harper's CV can be found at [www.econalysis.ca](http://www.econalysis.ca).

## **Cost Awards**

### **Request for Award of Costs**

VECC requests that it be awarded 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).

### **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 other 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 participation.

### **Importance of Service Provision and the Application of Charges to VECC**

VECC's constituents' general concerns are that electricity costs should be kept as low as possible consistent with maintaining acceptable reliability and quality of service. However, issues related to the provision of service and the application of charges are also important to VECC's constituents. Both low income and fixed income consumers are likely to be disproportionately affected by issues related

to disconnection policies and the application of late payment charges/specific charges.

### **Access to Other Sources of Funding**

As noted in PIAC's letter of July 14, 2004 on the matter of Stakeholder Participation in the Board's regulatory policy development processes, there are two types of customer and public interest organizations:

- Those that are member sponsored and can allocate a limited amount of staff resources paid out of membership fees to respond to the economic or political interests of their members and
- Public interest groups that are not generally member funded or do not have funds available for tribunal interventions,

VECC is in the latter category and uses the Public Interest Advocacy Centre to provide and co-ordinate the representation of its interests. VECC's constituent organizations, which consist of over one half million members, belong primarily to seniors and tenant groups. In order to provide meaningful and informed comment on the issues on which the Board is seeking input, VECC must either ask its counsel, consultants and advisors to undertake pro bono work or not participate at all, unless cost recovery is available through the Board's cost award process.

### **Contact Information**

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

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  
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(416) 348-0193 (office)  
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I look forward to a favorable response to this request.

Yours truly,



Michael Buonaguro  
Counsel for VECC