



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

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August 10, 2009

**VIA E-MAIL**

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

Dear Ms. Walli;

**Re: EB-2009-0158 and EB-2009-0192,  
NOTICE OF APPLICATION AND WRITTEN HEARING  
RELATING TO THE RECOVERY OF LRAM/ SSM AMOUNTS  
NOTICE OF APPLICATION AND WRITTEN HEARING RELATED TO THE  
APPROVAL OF A SMART METER FUNDING ADDER  
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 July 29, 2009, I hereby request that VECC be granted intervenor status and be judged eligible for costs in the above proceeding.

**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

As a representative of ratepayers, in particular Senior Citizens Groups, VECC considers that the Application raises a number of issues that may have cost consequences and may directly affect VECC's constituency.

Specifically, VECC wishes to examine and comment upon, the justification for, and rate impact of the Smart Meter Adder and the verification of the amounts claimed from ratepayers under the LRAM/SSM part of the application

I would appreciate all communications be directed to Counsel:

Michael Buonaguro  
34 King Street East, Suite 1102, Toronto, Ontario, M5C2X8.  
[mbuonaguro@piac.ca](mailto:mbuonaguro@piac.ca)

and our consultants:

Mr. Bill Harper Senior Consultant  
Dr. Roger Higgin, Managing Associate,  
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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

CC: Horizon Utilities Corporation  
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