



***PUBLIC INTEREST ADVOCACY CENTRE
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Michael Buonaguro
Counsel for VECC
(416) 767-1666

August 17, 2009

VIA MAIL and E-MAIL

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

Dear Ms. Walli:

Re: EB-2009-0243 – THESL Z Factor Application

Please find enclosed a notice of intervention filed on behalf of VECC with respect to the above noted proceeding. We apologize for the lateness of the filing, but we were not aware of the proceeding until it was brought to our attention by the School Energy Coalition on August 14, 2009. We believe that in the normal course VECC, along with other intervenors, are provided copies of notices of applications that relate to previous proceedings in which we intervened. In this case we were intervenors in the proceeding that gave rise to the rate orders governing the relevant time periods covered by this new application for a Z factor. Accordingly we ask that the Board accept our late intervention application.

Thank you.

Yours truly,

Michael Buonaguro
Counsel for VECC

cc: THESL

ONTARIO ENERGY BOARD

NOTICE OF INTERVENTION

OF

VULNERABLE ENERGY CONSUMERS COALITION (VECC)

To: Ms. Kirsten Walli
Board Secretary

And to: THESL

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:

Dr. Roger Higgin
Econalysis Consulting Services
34 King Street East, Suite 1102
Toronto, Ontario
M5C 2X8
(416) 348-9391 (office)
(416) 348-0641 (fax)
rhiggin@econalysis.ca

6. VECC requests that one hard copy of the Application and any additional supporting materials be forwarded to its consultant. In addition, VECC requests that electronic copies of all relevant materials be forwarded to both parties named above.
7. VECC is intervening in order to ensure that consumer interests and in particular the interests of the low-income and vulnerable users of electricity are fully represented in the Board's consideration of the requested relief. In particular, VECC is concerned about the appropriateness of the requested recovery from ratepayers in the context of a Z factor within THESL's existing rate structure, as well as the proposed allocation of the recovery.
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 17th DAY OF AUGUST 2009

Michael Buonaguro