

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

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Michael Buonaguro Counsel for VECC (416) 767-1666

September 21, 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: Vulnerable Energy Consumers Coalition (VECC)

Notice of Intervention: EB-2009-0260

Cambridge and North Dumfries Hydro Inc – 2010 Electricity Distribution

Rate Application

Please find enclosed the Notice of Intervention of the Vulnerable Energy Consumers Coalition (VECC) in the above-noted proceeding. We have also be directed a copy of the same to the Applicant.

Thank you.

Yours truly,

Michael Buonaguro Counsel for VECC

cc: Cambridge and North Dumfries Hydro Inc.

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Sch.B, as amended;

AND IN THE MATTER OF an Application by Cambridge and North Dumfries Hydro Inc. pursuant to section 78 of the *Ontario Energy Board Act* for an Order or Orders approving just and reasonable rates for the delivery and distribution of electricity.

NOTICE OF INTERVENTION

OF

VULNERABLE ENERGY CONSUMERS COALITION (VECC)

To: Ms. Kirsten Walli

Board Secretary

And to: Cambridge and North Dumfries Hydro Inc.

- 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-oops. 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 ensure that consumer interests and in particular the interests of the low-income and vulnerable users of electricity are fully represented in the determination of just and reasonable rates for 2009. Areas of the current Application of interest to VECC include: a) the proposed increase in distribution rates of over 11% b) the 17% increase in OM&A costs since 2008; c) the proposed cost of debt; d) the load forecast methodology, e) the allocation of costs to customer classes, and f) the proposed capital spending levels for the bridge and test years.

8. VECC agrees with the Board's proposal to deal with the application by way of a written proceeding, with the provision for an oral component if required. In VECC's view, the decision regarding the need for an oral

component is best made after the completion of the interrogatory process.

9. 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 21st DAY OF SEPTEMBER 2009

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