



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

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September 24, 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-2009-0172
Enbridge Gas Distribution Inc. 2010 Rates
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 September 18, 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 Tenants and Senior Citizens Groups, VECC considers that Enbridge's Application raises 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 impacts resulting from the Application.

Written or Oral Hearing

At this point in time when the prefiled evidence is not available, it is not possible to properly assess whether an oral hearing is required. Based on last year's proceeding, VECC believes that a discovery process involving IRs and technical conference, followed by a Settlement Conference, could suffice to address the 2010 IRM adjustment. If the other issues listed in the Application and Notice are to be addressed as well then these may require a separate phase of the proceeding as was the case last year.

I would appreciate that 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 reasonable costs and requests its costs in this proceeding.

Yours truly,

Original signed

Michael Buonaguro
Counsel for VECC