

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

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VIA FAX AND EMAIL

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

Dear Ms. Walli

Re: Vulnerable Energy Consumers Coalition (VECC) EB-2009-0331 Consultation re: OPG Filing Guidelines and Issues List

VECC has had the opportunity to review the comments of CCC, CME, AMPCO, and Energy Probe and agrees in general with their suggestions on procedural matters, filing guidelines and the framing of issues.

VECC does note that at one point AMPCO suggests that in order to streamline the process it may be advisable to eliminate the Technical Conference. In VECC's view Technical Conferences can be quite valuable in coming to an understanding of the evidence and interrogatory responses filed by the applicant, possibly avoiding a lot of technical cross-examination at the oral hearing phase of the application, and should not be summarily excised from the process.

With respect to the comments of OPG, VECC has had the opportunity to review the responding comments of SEC and supports those points in reply. In addition, VECC notes that for the most part the points raised by OPG were addressed by one or more intervenor in their respective preliminary comments; as stated above, VECC agrees with the existing intervenor comments on those topics as appropriate.

Thank you.

Yours truly,

Michael Buonaguro Counsel for VECC