



***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

December 4, 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-2009-0347

**Ontario Power Authority - Fiscal 2010 Expenditure and Revenue
Requirement Submission for Review**

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

Yours truly,

Michael Buonaguro
Counsel for VECC

cc: Miriam Heinz
Fred Cass

ONTARIO ENERGY BOARD

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

AND IN THE MATTER OF the Ontario Power Authority Fiscal 2010 Expenditure and Revenue Requirement Submission for Review.

NOTICE OF INTERVENTION

OF

VULNERABLE ENERGY CONSUMERS COALITION (VECC)

To: Ms. Kirsten Walli
Board Secretary

And to: Ontario Power Authority
Attn: Ms. Miriam Heinz
Regulatory Coordinator

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 requests that all correspondence and documentation also be copied to VECC's consultant:

Mr. James Wightman
Econalysis Consulting Services
34 King Street East, Suite 1102
Toronto, Ontario
M5C 2X8
(416) 348-0640 (office)
(416) 348-0641 (fax)
jwightman@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 actively participated in the OPA's 2008 revenue requirement proceeding and has participated and continues to participate in distribution and transmission applications that are impacted by the decisions, policies, and activities of the OPA. In addition, VECC actively participated in the recent IPSP proceeding.
8. The OPA's fees will represent a component of customers' overall 2010 electricity bills; furthermore, although the OPA's conservation costs are decreasing as the OPA's role in planning and implementing programs shifts to supporting LDCs in delivering programs, there will be increased investment related to the *Green Energy and Green Economy Act*, specifically with respect to the FIT Program.

9. VECC is intervening to ensure that consumer interests and in particular the interests of low-income and vulnerable users of electricity are fully represented in the Review.
10. 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 4th DAY OF DECEMBER 2009

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

Ontario Power Authority (“OPA”)
Fiscal 2010 Expenditure and Revenue Requirement Submission for Review
EB-2009-0347

DRAFT ISSUES LIST

Submissions of VECC

VECC has reviewed the document entitled “Draft Issues List” on the OEB website under Docket No. EB-2009-0347 and makes the following comments on the document.

With respect to Proposed Issues 1.1, 2.1, 3.1, 4.1, and 5.1, VECC suggests that the words “and appropriate” be inserted following the word “reasonable” to make the wording consistent with the proposed wording of Issue 6.1 of the Draft Issues List.

Under the assumption that the wording of the first six issues will allow a reasonable review of the components of the budgets for each strategic objective by e.g., expense category, program, etc., VECC has no further comments with respect to the wording of Issues 1.1 to 6.1 inclusive.

With respect to Proposed Issues 7.1-7.3 inclusive, VECC suggests that the words “and appropriate” be inserted following the word “reasonable.”

With respect to the September 17, 2008 Directive from the Minister of Energy and Infrastructure, VECC proposes the addition of an issue as follows:

10.0 OPA Response to the September 17, 2008 IPSP Directive

10.1 *What is the status and project timeline for OPA’s response to this Directive?*

10.2 Are the 2010 costs and 2010 deliverables reasonable and appropriate?

10.3 Is the overall cost of OPA's response reasonable and appropriate?