



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

ONE Nicholas Street, Suite 1204, Ottawa, Ontario, Canada K1N 7B7

Tel: (613) 562-4002. Fax: (613) 562-0007. e-mail: piac@piac.ca. <http://www.piac.ca>

Michael Buonaguro
Counsel for VECC
(416) 767-1666

September 16, 2010

VIA MAIL AND EMAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
26th Floor
2300 Yonge Street
Toronto, ON
M4P 1E4

Dear Ms. Walli:

Re: Review of Electricity Distribution Cost Allocation Policy
Board File Number: EB-2010-0219

Vulnerable Energy Consumers Coalition - Intention to Participate and Request an Award of Costs

As Counsel to the Vulnerable Energy Consumers Coalition (VECC), I am writing, per the Board's Letter of September 2nd to indicate VECC's intention to participate in the stakeholder meeting and provide comments regarding the above issue and request an award of costs.

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.

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:

333 Wilson Avenue, Suite 406
Toronto, ON
M3H 1T2

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

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. As well, PIAC coordinates the participation of VECC with the ongoing efforts to advance the interests of the specific constituency outside of the formal hearing process. PIAC has played this role in energy policy and ratemaking in Ontario for over two decades.

VECC's Interest in the Issue

VECC's constituents' general concerns are that electricity rates should be kept as low possible consistent with the need to maintain the reliability and quality of service. As the Board is aware, VECC has been actively involved in the review of the cost of service-based rate applications filed by electricity distributors for 2008, 2009 and 2010. Furthermore, during the course of the individual proceedings VECC has paid particular attention to both the manner in which distributors have applied the Board's cost allocation methodology as well as the specific proposals made regarding customer class revenue to cost ratios. In fact it is VECC's involvement in these proceedings that has given rise to some of the issues identified in the Board's letter. As a result this initiative is of direct interest to VECC. Furthermore, given its involvement over the past three years, VECC believes it is in a unique position to assist the Board and its consulting team with the current Cost Allocation Policy review.

VECC would request that both its counsel and its consultant be placed on the distribution list for future developments. The contact information for both is provided below:

Mr. Michael Buonaguro
Counsel
c/o Public Interest Advocacy Centre
34 King Street East, Suite 1102
Toronto, Ontario
M5C 2X8
(416) 348-0814 (office)
(416) 348-0641 (fax)
mbuonaguro@piac.ca

and

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

Mr. Harper's CV can be found at www.econalysis.ca.

VECC's Intention to Request an Award of Costs

VECC will be requesting an award of costs for its participation in this proceeding and believes that it meets the eligibility criteria set out in the Ontario Energy Board's Rules of Practice and Procedure and its Practice Direction on Cost Awards.

As noted in PIAC's letter of July 14, 2004 on the matter of Stakeholder Participation in the Board's regulatory policy development processes, there are two types of customer and public interest organizations:

- Those that are member sponsored and can allocate a limited amount of staff resources paid out of membership fees to respond to the economic or political interests of their members and
- Public interest groups that are not generally member funded or do not have funds available for tribunal interventions,

VECC is in the latter category and uses the Public Interest Advocacy Centre to provide and co-ordinate the representation of its interests. VECC's constituent organizations, which consist of over one half million members, belong primarily to seniors and tenant groups. In order to provide meaningful and informed comment on the issues on which the Board is seeking input, VECC must rely on cost awards to fund the participation of its counsel, consultants and advisors.

Yours truly,

A handwritten signature in black ink, appearing to read 'M. Buonaguro', with a stylized flourish at the end.

Michael Buonaguro
Counsel for VECC