



PUBLIC INTEREST ADVOCACY CENTRE
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December 6, 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: OEB Letter of November 17, 2010 regarding Transition to
International Financial Reporting Standards (IFRS) – Incentive Rate Making
(IRM) Working Group
Board File Number: EB-2008-0408 (continued)**

Participation of the Vulnerable Energy Consumers Coalition (VECC)

As Counsel to the Vulnerable Energy Consumer's Coalition (VECC), I am writing, per the Board letter of November 17th, 2010 to indicate VECC's interest in participating in the Board's IFRS/IRM Working Group.

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.

VECC's constituents' general concerns are that regulated rates for electricity and natural gas service should be kept as low as possible consistent with maintaining acceptable reliability and quality of service. The adoption of IFRS may create impacts on distribution rates and other charges and there are choices to be made in the transition to IFRS. As a result, this issue is of significance to VECC's constituents.

VECC's Participation

VECC requests status as a participant on the proposed Working Group and nominates Dr. James Wightman as its representative. Over past years Dr. Wightman has supported VECC's participation in rate proceeding for both Ontario natural gas and electricity distributors.

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

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Yours truly,

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