



***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](mailto:piac@piac.ca). <http://www.piac.ca>

Michael Buonaguro  
Counsel for VECC  
(416) 767-1666

December 16, 2010

**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-2010-0101**  
**Niagara-on-the-Lake Hydro Inc. (NOTL)**  
**2011 Distribution Rate Application**

We are in receipt of the objection of the applicant dated December 13, 2010, received by us on December 16, 2010, with respect to the intervention request of VECC in the above noted proceeding.

We note that in the applicant's rebasing application (EB-2008-0237) NOTL made a similar objection to the intervention of VECC. In that proceeding the Board acknowledged that VECC represented the interests of seniors across Ontario, including Niagara on the Lake, and that it was valuable to have a ratepayer group such as VECC as an intervenor. We enclose NOTL's objection letter and the Board's acceptance of VECC as an intervenor in EB-2008-0237, and ask that the Board accept VECC as an intervenor in this proceeding on the same basis.

We further note that the objection to VECC's intervention, submitted to the Board and NOTL on November 29, 2010, is dated December 13, 2010 (and forwarded to VECC on December 16, 2010 by the Board), well after the deadline for interrogatories (December 8, 2010). VECC prepared and filed its interrogatories as required on December 8, 2010 on the limited issue of the LRAM request, and had reviewed (and determined that interrogatories were not necessary) on the revenue to cost ratio adjustments requested. Accordingly it is inappropriate,

having waited until after intervenors were required to review the file and submit interrogatories, to now complain about VECC's intervenor status.

As always VECC has attempted to make its intervention as efficient as possible, and can advise the Board that the time invested in this application is commensurate with the limited nature of the issues.

Thank you.

Yours truly,

Michael Buonaguro  
Counsel for VECC  
Encl.



# Niagara-on-the-Lake Hydro Inc.

**RECEIVED**

**SEP 29 2008**

September 24, 2008

Ms. K. Walli  
Board Secretary  
Ontario Energy Board  
Suite 2701  
2300 Yonge Street  
Toronto, Ontario M4P 1E4

*EB-2008-0237*

OEB BOARD SECRETARY	
File No:	Sub File:
Panel	<i>CS PD</i>
Licensing	<i>SB</i>
Other	<i>KS</i>
00/04 <i>3c</i>	

VIA MAIL and FAX  
ONTARIO ENERGY BOARD  
OFFICE OF THE BOARD SECRETARY

Re: VECC Request For Intervenor Status  
Niagara-on-the-Lake Hydro Inc. Application for 2009 Electricity  
Distribution Rates - Board File No EB-2007-0755

Dear Ms. Walli,

Niagara-on-the-Lake Hydro Inc. is in receipt of a request to the Ontario Energy Board from the Vulnerable Energy Consumers Coalition (VECC) to register as an intervenor in our rate application. The request states that VECC represents the Federation of Metro Tenants Association and the Ontario Coalition of Senior Citizens' Organizations (OSCO). Niagara-on-the-Lake Hydro Inc. contends that neither of these groups is represented in our community. We ask that the O.E.B. reject this request for intervenor status unless VECC can produce names and contact information of Niagara-on-the-Lake residents whom are members of one of these groups and are requesting such representation.

We do support the Board's mandate to ensure just and reasonable rates and the opportunity for ratepayers within our community to intervene. However, unnecessary intervention, over and above the Board's scrutiny adds cost that our smaller customer base will ultimately and disproportionately shoulder. Our application is not complex and does not warrant multiple provincially-based intervenors.

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September 29, 2008

We therefore request that VECC not be granted intervenor status in this proceeding on the basis that they have no representation within Niagara-on-the-Lake and whose participation would add unnecessary cost with no tangible value.

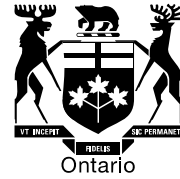
Regards,

A handwritten signature in cursive script, appearing to read "Jim Huntingdon".

Jim Huntingdon  
President.

**Ontario Energy  
Board**  
P.O. Box 2319  
27th Floor  
2300 Yonge Street  
Toronto ON M4P 1E4  
Telephone: 416- 481-1967  
Facsimile: 416- 440-7656  
Toll free: 1-888-632-6273

**Commission de l'Énergie  
de l'Ontario**  
C.P. 2319  
27e étage  
2300, rue Yonge  
Toronto ON M4P 1E4  
Téléphone: 416- 481-1967  
Télécopieur: 416- 440-7656  
Numéro sans frais: 1-888-632-6273



**BY E-MAIL ONLY**

October 1, 2008

James Huntingdon  
Niagara-on-the-Lake Hydro Inc.  
8 Henegan Road, P.O. Box 460  
Virgil ON L0S 1T0

Dear Mr. Huntingdon:

**Re: VECC Request for Intervenor Status  
Niagara-on-the-Lake Hydro Inc.  
Application for Approval of 2009 Electricity Distribution Rates  
Board File No. EB-2008-0237**

On September 24, 2008, the Board received a letter from Niagara-on-the-Lake Hydro Inc. (NOTL) in which NOTL objected to the Board granting intervenor status to the Vulnerable Energy Consumers Coalition (VECC).

NOTL questioned whether the two organizations represented by VECC, the Federation of Metro Tenants Association and the Ontario Coalition of Senior Citizens' Organizations (OSCO) were actually represented within the Town of Niagara-on-the-Lake. OTL also questioned the value added by VECC in this application and the cost of VECC's intervention.

The Board has considered NOTL's submission and confirms VECC as an intervenor in this proceeding, as well as its cost eligibility status. In making this decision, the Board notes that VECC represents seniors across Ontario including seniors in the Town of Niagara-on-the-Lake. In addition, the Board feels that it would be helpful to the rate setting process to have a ratepayer group such as VECC as a participant.

The Board recognizes that the costs of an intervention can be relatively significant for a smaller utility such as NOTL. The Board notes that the cost awards and therefore cost

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claims should recognize the financial ability of distributors to pay those costs. The Board will take these concerns into account when granting any cost award to VECC at the completion of this proceeding.

Yours truly,

*Original signed by*

Kirsten Walli  
Board Secretary

cc: Michael Buonaguro, Public Interest Advocacy Centre  
Bill Harper, Econalysis Consulting Services