



PUBLIC INTEREST ADVOCACY CENTRE
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April 5, 2011

VIA FAX, EMAIL AND COURIER

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: Letter of March 31, 2011 regarding the Review of Electricity
Distribution Cost Allocation Policy (EB-2010-0219)
Vulnerable Energy Consumers Coalition (VECC) Nomination of
Working Group Participant**

As Counsel to the Vulnerable Energy Consumer's Coalition (VECC), I am writing, per the Board letter of March 31st, 2011 to nominate Mr. William Harper to the Cost Allocation (CA) Working Group the Board is establishing to implement the revisions to Cost Allocation Policy set out in the Board's EB-2009-0219 Report. The following sections address the interests of the constituency represented by VECC and briefly outline Mr. Harper's relevant experience and qualifications.

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.

VECC consists of the following organizations:

- The Federation of Metro Tenants Association (FTMA)
- The Ontario Coalition of Senior Citizens' Organizations (OCSCO)

The Federation of the Metro Tenants Association (the “FTMA”) is a non-profit corporation composed of hundreds of 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, education, and assistance to tenants. The address is:

500-27 Carlton Street
Toronto, ON
M5B 1L2

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 coalition of the FMTA and OCSCO under the name VECC has the specific mandate of intervening in proceedings to advocate on behalf of the interests of Ontario’s vulnerable consumers with respect to energy issues, primarily through intervention in regulatory proceedings at the Ontario Energy Board.

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 consultant support to the VECC participation.

Importance of Electricity Cost Allocation to VECC

VECC’s constituents’ general concerns are that distribution rates should be kept as low as necessary to maintain the reliability and quality of distribution service. In this regard issues related to the apportionment of amongst customer classes and how individual customers are to be billed for electricity are as important as the determination of overall revenue requirement itself. As result, the cost allocation methodology that underpins it is critical issue to VECC constituents.

CA Working Group Participation

As directed by your letter of March 31st, 2011, I am nominating William Harper of Econalysis Consulting Services to participate on the OEB's CA Working. Should he be accepted on that Group, VECC also seeks cost recovery for his participation. Details regarding Mr. Harper's relevant experience and expertise are provided in Attachment A.

Cost Awards

VECC and its consultants have already been identified by the Board as eligible for an award of costs in conjunction with their participation in EB-2010-00219.

I look forward to a favorable response to this request.

Yours truly,



Michael Buonaguro
Counsel for VECC