



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

February 5, 2008

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-2007-0755
Chapleau Public Utilities Corporation – 2008 Electricity Distribution
Rate Application

We are writing on behalf of our client, the Vulnerable Energy Consumers' Coalition (VECC), in reply to the letter of January 31, 2008 from Chapleau Public Utilities Corporation, wherein Chapleau objected to VECC's intervenor status in the above-captioned proceeding. The basis of Chapleau's objection is its belief that VECC does not represent any person or organization in its service area.

Chapleau's suggestion that our client is required to "confirm" it represents persons or organizations within its service area would, if followed in every rate application for every public interest intervenor, be impractical and create needless expense. In VECC's case, one of VECC's members, OCSCO, for example, includes over 140 seniors' organizations and individuals representing well over 500,000 senior citizens from across Ontario. Other public interest organizations would have similar problems in matching members' residence with franchise area.

More importantly, while numbers and residence of organization members might conceivably be important in circumstances where the Board considers issues

such as compensation to, or treatment of, land owners for certain LDC projects and operations and where a group seeks to represent the interests of that constituency, it is unlikely to be relevant in the routine determination of issues of revenue requirement including cost allocation and rate design. With respect, the Chapleau approach confuses the pertinent question of whether the application concerns the interests of the rate-paying constituency that VECC seeks to represent with the identification of individual ratepayers in the organizations making up the VECC coalition. VECC does not believe that Chapleau is making the submission that its application will have no impact upon vulnerable consumers and/or that there are no such customers of Chapleau within its franchise area. We enclose for your review a previous decision of the Board on the very issues raised by Chapleau. The decision confirmed that VECC's interventions in EDR applications had merit, and that VECC was not required to identify a particular customer within a distributor's franchise area in order to qualify for intervention status and to be eligible for costs.

In most Board proceedings, VECC advocates for the interests of low income and vulnerable energy consumers across Ontario without making inquiry whether its member organizations have individual member customers within the relevant jurisdiction. If there were no vulnerable and/or low-income customers whose interests are affected by the Chapleau application, then VECC would not, and should not, intervene. We believe that VECC's representation meets that criterion of relevance in this proceeding.

It should be noted that in many of the EDR applications before the Board for 2008 rates VECC is one of only a few, and in some instances is the only intervenor of record. VECC respectfully submits that its comprehensive representation of vulnerable consumer interests across the various distributors in Ontario is helpful to the Board in terms of maintaining consistent regulatory oversight over all regulated distributors.

VECC would respectfully note that in this instance the objection to its intervention was raised on January 31, 2008, the same date that IR's were due. Accordingly, although Chapleau was within the time frame for filing its objection, its objection came after VECC's interrogatories had been prepared and filed in accordance with the Board's confirmation of VECC as an intervenor eligible for costs (subject to Chapleau's possible objections) on January 22, 2008. Accordingly the bulk of the work involved in intervening, given that this proceeding is to be resolved by way of written submissions, has already been performed by VECC in order to meet the Board's procedural deadlines.

Unlike all of the applicants to the Board in the 2008 EDR applications, VECC has no funds of its own and no mechanism for recovering its costs directly from ratepayers it represents. It therefore depends on cost awards to be able to provide critical, and meaningful, analysis to the evidence submitted by the applicants.

VECC strongly objects to the intimation by Chapleau that VECC's intervention should be considered "frivolous and unnecessary in nature", and that VECC's participation "would add no tangible value and would add unnecessary costs." With respect, VECC submits that it has a well established history of responsible intervention that adds value to Board proceedings, as well as a history of efficiency with respect to the cost of its interventions.

Accordingly, VECC respectfully submits that Chapleau's submission with respect to VECC's intervenor status be given no weight and that VECC's intervenor status be maintained along with its eligibility for a cost award in the proceeding.

Thank you.

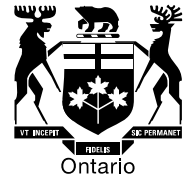
Yours truly,



Michael Buonaguro
Counsel for VECC
Encl.

**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
27^e étage
2300, rue Yonge
Toronto ON M4P 1E4
Téléphone: 416-481-1967
Télécopieur: 416-440-7656
Numéro sans frais: 1-888-632-6273



BY EMAIL ONLY

January 27, 2006

Mr. Bruce Craig
President
Lakefront Utilities Inc.
P.O. Box 577
207 Division Street
Cobourg ON K9A 4L3

Dear Mr. Craig:

**Re: 2006 Electricity Distribution Rates Application
Lakefront Utilities Inc.
Board File Number RP-2005-0020 / EB-2005-0387
Intervenor Status for Vulnerable Energy Consumers' Coalition**

This will acknowledge receipt of your letter dated January 13, 2006 objecting to the intervenor status for the Vulnerable Energy Consumers' Coalition (VECC). The Board has received a response from VECC's counsel, dated January 26, 2006. The letter indicated that you were sent a copy.

The Board considers that VECC's interventions in the specific distributors' 2006 rate applications have merit, without requiring it to identify customers of a specific distributor that it might represent. Therefore, the Board is maintaining the status of VECC as an intervenor in Lakefront Utilities' application, together with its eligibility for a cost award in the proceeding.

Yours truly,

Original signed by

Peter H. O'Dell
Assistant Board Secretary