



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

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Michael Buonaguro
Counsel for VECC
(416) 767-1666

September 28, 2011

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-2011-0277**

Please find enclosed the Notice of Intervention of VECC in the above-noted proceeding.
We have also directed a copy of the same to the Applicant.

Thank you.

Yours truly,

Michael Buonaguro
Counsel for VECC
Encl.

ONTARIO ENERGY BOARD

IN THE MATTER OF AN APPLICATION BY

ENBRIDGE GAS DISTRIBUTION INC.

For 2012 GAS DISTRIBUTION RATES

NOTICE OF INTERVENTION

OF THE

VULNERABLE ENERGY CONSUMERS COALITION

To: Ms. Kirsten Walli
Board Secretary

And to: Mr. Norm Ryckman, Director Regulatory Affairs, Enbridge Gas Distribution Inc.

1. The Vulnerable Energy Consumers Coalition (VECC) hereby expresses its intention to intervene and participate in the above-mentioned proceeding. VECC consists of the following organizations:

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

2. The Federation of the Metro Tenants Association (the “FTMA”) 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

3. The Ontario Coalition of Senior Citizens’ Organizations (“OCSCO”) is a coalition of over 160 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

4. 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.
5. 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.

6. The name and address of the agent authorized to receive documents on behalf of VECC is:

Mr. Michael Buonaguro
Counsel
c/o Public Interest Advocacy Centre
34 King Street East, Suite 1102
Toronto, Ontario
M5C 2X8
(416) 767-1666 (office)
(416) 348-0641 (fax)
mbuonaguro@piac.ca

7. VECC would request that all correspondence and documentation also be copied to VECC's consultant:

Roger Higgin
Econalysis Consulting Services
34 King Street East, Suite 1102
Toronto, Ontario
M5C 2X8
416 348-9391 (office)
(416) 348-0641 (fax)
rhiggin@econalysis.ca

8. VECC requests that a paper copy of the application and any additional supporting materials be forwarded to Dr. Higgin at the above address and that electronic copies be sent to both Mr. Buonaguro and Dr. Higgin at their respective e-mail addresses.
9. In addition to the usual issues related to an IRM adjustment application, VECC notes that Enbridge Gas distribution Inc. has filed evidence on a number of other issues including: a proposal to establish new Z Factors

for Pension–related costs and TSSA Standards-related costs. The Board’s disposition of these and other issues in the application may affect consumers represented by VECC.

10. VECC notes that it has previously been approved as an intervenor in proceedings related to Enbridge Gas Distribution, including its last 4 IRM applications.
11. VECC is intervening in order to ensure that consumer interests and in particular the interests of the low-income and vulnerable users of natural gas are fully represented in the determination of just and reasonable rates for 2012.
12. VECC also notes that Enbridge is requesting that its application proceed by way of two phases as in prior years. VECC is in the process of reviewing the application and respectfully requests that if there are any requests for changes in process, VECC be provided an opportunity to make submissions on the manner in which the application is to be heard.
13. VECC will be requesting an award of costs for its participation in this proceeding and believes that, as a coalition representing the direct interests of consumers, it meets the eligibility criteria set out in the Ontario Energy Board’s Rules of Practice and Procedure (Section 41) and its’ Practice Direction on Cost Awards (Section 3.03).
14. VECC’s members do not have access to the direct funding required to retain appropriate legal and consulting support for its intervention in OEB proceedings. Accordingly VECC relies on PIAC to provide legal support

and retain qualified consultants on the basis that PIAC can recover the related fees and disbursements from the Board based on the Board's Practice Direction on Cost Awards at the prevailing Cost Award Tariff.

DATED AT TORONTO, SEPTEMBER 28, 2011