



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

February 03, 2012

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-2011-0415
Welland Hydro-Electric System Corp.

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.

cc: Welland Hydro-Electric System Corp.
Mr. Wayne Armstrong

ONTARIO ENERGY BOARD

IN THE MATTER OF

the *Ontario Energy Board Act, 1998*,
S.O. 1998, c. 15, Sch. B, as amended;

AND IN THE MATTER OF an Application by
Welland Hydro-Electric System Corp. pursuant
to section 78 of the Ontario Energy Board Act
or an order or orders approving just and reasonable
rates beginning May 1, 2012 to reflect the recovery
costs for deployed smart meters.

NOTICE OF INTERVENTION

OF THE

VULNERABLE ENERGY CONSUMERS COALITION

To: Ms. Kirsten Walli
Board Secretary

And to: Welland Hydro-Electric System Corp.
Attention: Mr. Wayne Armstrong

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 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

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:

Ms. Shelley Grice, P. Eng.
Econalysis Consulting Services
34 King Street East, Suite 1102
Toronto, Ontario
M5C 2X8
(647) 880-9942 (cell)
(416) 348-0641 (fax)
shelley.grice@rogers.com

8. VECC has accessed the Application as filed on the OEB's web site. VECC requests that copies of any additional supporting materials be forwarded to each of the two parties named above.
9. VECC is intervening in the current Application in order to ensure that consumer interests and in particular the interests of the low-income and vulnerable users of electricity are fully represented in the determination of just and reasonable rates. The area of the current Application of interest

- to VECC is: a) the disposition of costs; b) the proposed rate riders; and c) the prudence of costs and appropriate recovery from proper rate classes.
10. At this stage, VECC agrees with the Board's proposal to deal with the application by way of a written hearing. However, pending the completion of the interrogatory process, VECC reserves the right to request the provision of an oral component if required.
 11. 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).
 12. 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, FEBRUARY 3, 2012