



PUBLIC INTEREST ADVOCACY CENTRE

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Board of Directors

Michael MacNeil Chair,
Ottawa

June 25, 2012

VIA EMAIL

Krista Devine
Ottawa

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319

Harry Gow
Chelsea

George Iny
Montreal

26th Floor
2300 Yonge Street
Toronto, ON
M4P 1E4

Bill Knight
Ottawa

Claire McNeil
Halifax

Dear Ms. Walli:

Cynthia Patterson
Gaspé

RE: EB-2012-0246
Policy Review of Micro-Embedded Generation Connection Issues
Late Filing of the Vulnerable Energy Consumers Coalition -
Intention to Participate and Request an Award of Costs

Arne Paus-Jenssen
Saskatoon

Howard Pawley
Windsor

Rob Rainer
Ottawa

Vinay Shandal
Toronto

Leigha Worth
Vancouver

As per the Announcement and Purpose of Board Consultation date May 15, 2012 it was noted that interested parties needed to indicate their intent to participate by May 29, 2012. It has just been brought to our attention that due to an administrative oversight the VECC intention to participate was not filed as required. On behalf of VECC please accept this late filing of Intention to Participate.

Armine Yalnizyan
Toronto
Ottawa Office

As Counsel to the Vulnerable Energy Consumers Coalition (VECC), I am writing, per the Board's announcement of May 15th to indicate VECC's intention to provide participate in the above proceeding and request an award of costs.

Michael Janigan
Executive Director
General Counsel
Ext. 26

Interests Represented

Donna Brady
Office Administrator
Ext. 21

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. The Vulnerable Energy Consumers Coalition (VECC) is currently comprised of the Ontario Coalition of Senior Citizens (OCSCO), and the Federation of Metro Tenants Association.

John Lawford
Counsel, Ext. 25

Janet Lo
Counsel, Ext. 24

Toronto Office
Michael Buonaguro
Counsel
(416) 767-1666

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:

Honourary Directors
William H. Hurlbert
Edmonton

Andrew J. Roman
Toronto

Gaylord Watkins
Jakarta

333 Wilson Avenue,
Suite 406
Toronto, ON
M3H 1T2

The Federation of the Metro Tenants Association 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

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 advice.

VECC's Interest in the Proceeding

VECC's constituents' general concerns are that electricity rates should be kept as low possible consistent with the need to maintain the reliability and quality of service.

While increasing electricity supply within the Province, the introduction of micro-fit generation has increased the costs incurred by electricity distributors. Ensuring appropriate processes are in place for the connection of such generation and the setting of appropriate tariffs for such generators are important issues in ensuring costs are managed and fairly shared across all customers, including micro-fit generators. As a result, VECC and its constituents have a direct interest in the outcome of the proceeding.

VECC would request that both its counsel and its consultant be placed on the distribution list for future developments. The contact information for both is provided below:

Mr. Michael Janigan
Counsel
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and

Mr. Bill Harper
Econalysis Consulting Services
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M5C 2X8

(416) 348-0193 (office)
(416) 348-0641 (fax)
bharper@econalysis.ca

Mr. Harper's CV can be found at www.econalysis.ca.

VECC's Intention to Request an Award of Costs

VECC will be requesting an award of costs for its participation in this proceeding and believes that it meets the eligibility criteria set out in the Ontario Energy Board's Rules of Practice and Procedure and its Practice Direction on Cost Awards.

As noted in PIAC's letter of July 14, 2004 on the matter of Stakeholder Participation in the Board's regulatory policy development processes, there are two types of customer and public interest organizations:

- Those that are member sponsored and can allocate a limited amount of staff resources paid out of membership fees to respond to the economic or political interests of their members and

- Public interest groups that are not generally member funded or do not have funds available for tribunal interventions,

VECC is in the latter category and uses the Public Interest Advocacy Centre to provide and coordinate the representation of its interests. VECC's constituent organizations, which consist of over one half million members, belong primarily to seniors and tenant groups. In order to provide meaningful and informed comment on the issues on which the Board is seeking input, VECC must rely on cost awards to fund the participation of its counsel, consultants and advisors.

Items Identified for Review

As requested in the Board's May 15th letter VECC has considered the six issues proposed as matter for review in this proceeding and, at this time, has no additional issues to add.

Yours truly,



Michael Janigan
Counsel for VECC