



***PUBLIC INTEREST ADVOCACY CENTRE
LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC
ONE Nicholas Street, Suite 1204, Ottawa, Ontario, Canada K1N
7R7***

Michael Janigan
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July 16, 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-2012-0136
Application by Hydro One Networks Inc. for Distribution Rates for 2013**

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 Janigan
Counsel for VECC
Encl.

ONTARIO ENERGY BOARD

IN THE MATTER OF AN APPLICATION BY

HYDRO ONE NETWORKS INC. FOR

2013 ELECTRICITY DISTRIBUTION RATES

NOTICE OF INTERVENTION

OF THE

VULNERABLE ENERGY CONSUMERS COALITION

To: Ms. Kirsten Walli
Board Secretary

And to: Mr. Pasquale Catalano, Hydro One Networks 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 Janigan
Counsel
Public Interest Advocacy Centre (PIAC)
One Nicholas Street, Suite 1204
Ottawa, Ontario
K1N 7B7
(613) 562-4002 extension 26 (office)
(613) 562-0007 (fax)
mjanigan@piac.ca

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

Bill Harper
Econalysis Consulting Services
34 King Street East, Suite 1102
Toronto, Ontario
M5C 2X8
416-348-0193 (office)
bharper@econalysis.ca

Also, VECC requests that one paper copy of all materials be forwarded to Mr. Harper at the above address.

8. VECC notes that while, Hydro One Networks' Application is characterized in the Notice as being filed under the Board's Incentive Regulation Mechanism framework, the Application varies from the Board's standard IRM methodology in a number of areas. As result, the proposal raises a

number of significant issues that may serve as precedent in future rate applications. VECC also notes that the proposed implementation of the density study findings and finalization of Hydro One Networks' rate harmonization has wide ranging impacts on its Residential customers.

9. VECC is intervening 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 for 2013.
10. 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).
11. 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, JULY 16, 2012