



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

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October 26, 2012

VIA E-Mail and Mail

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
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Toronto, ON
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mjanigan@piac.ca

613-562-4002 x 26

Dear Ms. Walli:

**Re: Hydro 2000, Rates Application 2013 Rates EB 2012-0133
Objection to VECC Intervention**

We are in receipt of undated correspondence from Hydro 2000 responding to the request of the Vulnerable Energy Consumers Coalition (VECC) for intervenor status in the within hearing. Hydro 2000 objects to the VECC intervention principally on the grounds that the company has worked diligently on its application, with the help of Board staff, and sees little need to involve any stakeholders in the process of the application review before the Board.

With respect, while we are pleased that Hydro 2000 has attempted to conform with the Board filing standards that are expected of the company, the effort of so doing does not dispense with the required process of review of its application. Hydro 2000's preparation, as described, may well abbreviate the process of review, but cannot, by itself, ensure that the revenue requirement requested is prudent and the rates are just and reasonable.

A review of the data compiled from Board's own statistics showed that the process of OEB regulatory review of electricity distribution companies had saved consumers on average \$28 per customer (3.8% of the requested revenue requirement) at costs associated with all interventions of a little over two cents per customer. And while the scrutiny may seem demanding, it results in the Board being better able to meet its responsibilities concerning superintendence of rates pursuant to the governing legislation.

VECC intends to adhere to the required standards of responsible representation, and believes that its history of interventions before the Board associated with small distributors speaks to that principle.

Yours truly,

Michael Janigan
Counsel for VECC

Cc: Hydro 2000 - René Beaulne - aphydro@hawk.igs.net