



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

**ONE Nicholas Street, Suite 1204, Ottawa, Ontario, Canada K1N 7B7**

Tel: (613) 562-4002. Fax: (613) 562-0007. e-mail: [piac@piac.ca](mailto:piac@piac.ca). <http://www.piac.ca>

Michael Janigan  
Counsel for VECC  
(613) 562-4002 x26

November 21, 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-2012-0146/0380  
London Hydro Inc. 2013 Rate Application**

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.

Yours truly,

Michael Janigan  
Counsel for VECC

cc:Mr. Mike Chase, London Hydro Inc.- [chasem@londonhydro.com](mailto:chasem@londonhydro.com)

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF AN APPLICATION BY**

**LONDON HYDRO INC.**

**2013 ELECTRICITY DISTRIBUTION RATES**

**NOTICE OF INTERVENTION**

**OF THE**

**VULNERABLE ENERGY CONSUMERS COALITION**

To: Ms. Kirsten Walli  
Board Secretary

And to: Mr. Mike Chase, London Hydro 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](mailto:mjanigan@piac.ca)

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

Mark Garner (project manager)  
Econalysis Consulting Services  
34 King Street East, Suite 1102  
Toronto, Ontario  
M5C 2X8  
(647) 408-4501 (office)  
(416) 348-0641 (fax)  
[mgarner@econalysis.ca](mailto:mgarner@econalysis.ca)

and to

Bill Harper  
Econalysis Consulting Services  
34 King Street East, Suite 1102  
Toronto, Ontario  
M5C 2X8  
[bharper@econalysis.ca](mailto:bharper@econalysis.ca)

4. In order to mitigate costs VECC requests only electronic copies of the materials. VECC may request paper copies of some or all of the materials should this become necessary. VECC requests electronic copies of the application and any additional supporting materials be sent to Mr. Janigan, Mr. Garner and Mr. Harper at their respective e-mail addresses.
5. VECC notes that London Hydro Inc. (London Hydro) purports to require a large increase in its revenue requirement as compared to its last cost of service rebasing and reports a large deficiency on this request. VECC also notes the Applicant proposes significant changes to rate class revenue-to-cost ratios.
6. VECC has previously been approved as an intervenor in proceedings related to London Hydro, including its smart meter cost recovery application EB-2012-0187, its last IRM application EB-2011-0181, and its last cost of service rebasing application, EB-2008-0235.
7. 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 and, insofar as the new rates requested in this application will form the basis for future rates in the years beyond 2013.
8. 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).

9. 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, NOVEMBER 21, 2012**