



**PUBLIC INTEREST ADVOCACY CENTRE**  
**LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC**  
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March 15, 2013

**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-2012-0394**  
**Enbridge Gas Distribution Inc. (EGDI)**

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 as well as their Counsel.

Yours truly,

Michael Janigan  
Counsel for VECC

EGDI – Norm Ryckman – [EGDRegulatoryProceedings@enbridge.com](mailto:EGDRegulatoryProceedings@enbridge.com)  
Counsel – Dennis O'Leary – [doleary@airdberlis.com](mailto:doleary@airdberlis.com)

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF AN APPLICATION BY**

**ENBRIDGE GAS DISTRIBUTION INC.**

**UPDATE TO THE 2012-2014 DEMAND SIDE MANAGEMENT PLAN**

**NOTICE OF INTERVENTION**

**OF THE**

**VULNERABLE ENERGY CONSUMERS COALITION**

To: Ms. Kirsten Walli  
Board Secretary

And to: Mr. Norm Ryckman – EGDI  
Dennis O’Leary – Counsel for EGDI

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 agents authorized to receive documents on behalf of VECC are:

Mr. Michael Janigan  
Special Counsel  
Regulatory and Consumer Affairs  
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:

Roger Higgin  
SPA Inc.  
15 Malabar Place  
Toronto, ON  
M3B 1A4  
(416) 391-0738  
[spainc@rogers.com](mailto:spainc@rogers.com)

8. 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 sent to Mr. Janigan and Dr. Higgin at their respective e-mail addresses.
9. VECC notes that Enbridge Gas Distribution Inc. (EGDI) is seeking approval for an update to its 2012-2014 Demand Side Management (DSM) plan.
10. VECC has previously been approved as an intervenor in proceedings related to EGDI including its most recent application EB 2011-0354.
11. VECC is intervening in order to ensure that consumer interests and in particular the interests of the low-income and vulnerable consumers are fully represented in the determination of the EGDI request.
12. 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).

13. 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, MARCH 15, 2013**