



**PUBLIC INTEREST ADVOCACY CENTRE**  
**LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC**  
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September 12, 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)**  
**Request for Intervention EB-2013-0234**  
**Toronto Hydro-Electric System Limited**

VECC respectfully requests that the Board grant it intervener status in the above-noted proceeding.

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 counsel.

Thank you.

Yours truly,

Michael Janigan  
Counsel for VECC

cc THESL – Amanda Klein – [regulatoryaffairs@torontohydro.com](mailto:regulatoryaffairs@torontohydro.com)  
Counsel – Robert Warren – [rwarren@weirfoulds.com](mailto:rwarren@weirfoulds.com)

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the Ontario Energy Board Act, 1998, S.O.  
1998, c.15 (Schedule B);

**AND IN THE MATTER OF** an application by Toronto Hydro-Electric System  
Limited for an order pursuant to section 29 of the Ontario Energy Board Act,  
1998.

**NOTICE OF INTERVENTION**  
  
**OF THE**  
  
**VULNERABLE ENERGY CONSUMERS COALITION**

To: Ms. Kirsten Walli  
Board Secretary

And to: Robert B. Warren  
Nikiforos Iatrou  
WeirFoulds LLP

Rob Barrass  
Lead Regulatory Counsel  
Toronto Hydro-Electric System Limited

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  
Special Counsel  
Regulatory and Consumer Affairs  
Public Interest Advocacy Centre (PIAC)  
ONE Nicholas Street, Suite 1204  
Ottawa, ON  
K1N 7B7  
(613) 562-4002 x26 (office)  
(613) 562-0007 (fax)  
[mjanigan@piac.ca](mailto:mjanigan@piac.ca)

7. VECC requests that a paper copy of the application and any additional supporting materials be forwarded to Mr. Janigan his e-mail address.
8. VECC notes that it has previously been approved as an intervenor in proceedings related to Toronto Hydro Electric Systems Limited, including EB 2011-0120, a proceeding that concerned issues that will be revisited in the within proceeding..
9. VECC is intervening in order to ensure that consumer interests and, in particular, the interests of the low-income and vulnerable users of gas are fully represented in the determination of the following issues that are engaged in the within proceeding :

- (a) Whether competition exists in the relevant market that is sufficient to protect the public interest within the meaning of sec. 29(1) of the Ontario Energy Board Act 1998;
  - (b) Whether forbearance sought by the applicant requires additional measures to safeguard the public interest.;
  - (c) The effect of forbearance upon the revenue requirement of the applicant;
  - (d) Whether the public interest in access to competitive markets in telecommunications requires the regulation of the relevant market by the Ontario Energy Board.
- 11.(a) 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).
- (b) 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 OTTAWA, SEPTEMBER 12, 2013**