



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

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Michael Janigan
Counsel for VECC

January 6, 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-2013-0134
Haldimand County Hydro Inc.

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: Haldimand - R. Jane Albert - jalbert@hchydro.ca

ONTARIO ENERGY BOARD

IN THE MATTER OF AN APPLICATION BY

HALDIMAND COUNTY HYDRO INC.

2014 ELECTRICITY DISTRIBUTION RATES

NOTICE OF INTERVENTION

OF THE

VULNERABLE ENERGY CONSUMERS COALITION

To: Ms. Kirsten Walli
Board Secretary

And to: Ms. Jane Albert, President & CEO, Haldimand County 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

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 630
Toronto, Ontario
M5C 2X8
(647) 408-4501 (office)
(416) 348-0641 (fax)
mgarner@econalysis.ca

and to

Bill Harper
Econalysis Consulting Services
34 King Street East, Suite 630
Toronto, Ontario
M5C 2X8
bharper@econalysis.ca

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 be sent to Mr. Janigan, Mr. Garner and Mr. Harper at their respective e-mail addresses.
9. VECC notes that Haldimand County Hydro Inc. (Haldimand Hydro) is seeking to incorporate into the proposed new rates an increase in operating costs of over 16% from the amount last approved by the Board. We also note that Haldimand Hydro is seeking to include in rates an increase rate base of over 33% from the 2010 Board approved amount whereas growth during this period has been only 1% higher. The Utility is also proposing to deviate from the Board's default weightings for its cost allocation model.
10. VECC has previously been approved as an intervenor in proceedings related to Haldimand Hydro, including its last rate application application, EB-2012-0129 and its last cost of service rebasing application, EB-2009-0265.
11. 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 2014 and, insofar as the new rates requested in this application will form the basis for a future rates in the years beyond 2014.

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, JANUARY 6, 2014