



PUBLIC INTEREST ADVOCACY CENTRE

LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC

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January 17, 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: EB-2013-0174 - Veridian Connections Inc.
Letter of Objection of the Vulnerable Energy Consumers Coalition (VECC)**

We are in receipt of the Board's Procedural Order No. 2 in the above noted case issued on January 16th 2014. VECC objects to the proposed scheduling and is seeking the Board either amend the procedural order or accept our interrogatory filings late.

Our submission is based on the following objections:

1. The Board's current overall scheduling overwhelms the known intervenors. During the week of January 20th and January 27 the Board has scheduled eight (8) different events requiring substantive time and work commitments. Among these are: Argument
Kitchener-Wilmot; Enbridge settlement conference, and three different sets of interrogatories for electric distribution utilities. The Board is aware that intervenors have limited resources and can address only so many near consecutive events.
2. The Board issued the Notice for this Applicant 30 days later than it did for Orangeville Hydro and Oakville Hydro yet its interrogatories are due at virtually the same time.
3. The Board required 30 days to make its decision on the Applicant's issues list; it is not unreasonable for intervenors to request sufficient time to study and question the relevant facts in play for each issue. We also note that the new issues list makes development of interrogatories and their proper formatting more difficult, at least in its initial application.
4. In particular, while the intervenors are to be allowed only 7 days from the issuance of the Procedural Order to develop their interrogatories, the Applicant is allowed 15 days to respond to them.
5. While there is often consultation on the case schedule, there was none in this case (at least for VECC). While the Board is not obligated to do so, in the absence of a central coordinator to attend to potential conflicts, it clearly makes sense to do so.

6. Finally, we note that there are four (4) electric distribution costs of service applications on a concurrent path (Niagara-on-the-Lake Hydro, Orangeville Hydro, Oakville Hydro and Veridian). We suggest that a small variance in the schedule is unlikely to affect the timing of the release of the four decisions.

The announced scheduling of this proceeding amidst an already crowded calendar is detrimental to the ability of the intervening parties to effectively review applications. It is trite to note that the balance of resources and information symmetry is by nature tilted toward applicants. The scheduling of this case creates a greater imbalance.

In the alternative we would ask the Board make the following adjustment to the Procedural Order.

Interrogatories due February 7th.
Response from the Applicant due February 24.
Settlement Conference March 5th.

This would have the added benefit of having the Veridian Settlement Conference occur four days after the start of the Oakville Hydro settlement conference. As such it might allow VECC and any other out of town participants to minimize travel expenses.

If this is not possible and while VECC would make best efforts we would ask that the Board allow us to file its interrogatories on February 4th.

All of which is respectfully submitted.



Michael Janigan
Counsel for VECC

cc: Veridian Connection - George Armstrong - garmstrong@veridian.on.ca
All Registered Intervenors