



**PUBLIC INTEREST ADVOCACY CENTRE**

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

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

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March 10, 2013

**VIA 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-2013-0130  
Fort Frances Power Corporation**

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,

A handwritten signature in black ink, appearing to read 'Michael Janigan', is written over a light blue horizontal line.

Michael Janigan  
Counsel for VECC

cc: Fort Frances - Lori Cain - [ffpc@fort-frances.com](mailto:ffpc@fort-frances.com)

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF AN APPLICATION BY**

**FORT FRANCES POWER CORPORATION**

**2014 ELECTRICITY DISTRIBUTION RATES**

**NOTICE OF INTERVENTION**

**OF THE**

**VULNERABLE ENERGY CONSUMERS COALITION**

To: Ms. Kirsten Walli  
Board Secretary

And to: Ms. Lori Cain, Fort Frances Power Corporation

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 630  
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 630  
Toronto, Ontario  
M5C 2X8  
[bharper@econalysis.ca](mailto: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 Fort Frances Power Corporation (Fort Frances Power) is seeking rate increases of over 55% to its fixed and variable charges. These increases are driven by significant increases to both the Applicant's future capital program and its operating and maintenance expenses.
10. VECC notes that Fort Frances Power has not had a cost of service review since 2006. VECC has previously been approved as an intervenor in proceedings related to Fort Frances Power, including its 2012 smart meter application EB-2012-0327 and its 2011 LRAM application EB-2011-0146.
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, MARCH 10, 2014**