



PUBLIC INTEREST ADVOCACY CENTRE
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May 28, 2014

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
Toronto, ON
M4P 1E4

Dear Ms. Walli:

**Re Milton Hydro Distribution Inc., Distribution License ED-2003-0014
Z-Factor Application EB-2014-0162
Intervenor Intention of Vulnerable Energy Consumers Coalition**

Milton Hydro Distribution Inc. ("Milton Hydro") is in receipt of the Vulnerable Energy Consumers Coalition ("VECC") Notice of Intervention in Milton Hydro's application for approval of a Z-Factor Rate Rider for recovery of ice storm related restoration costs, Ontario Energy Board ("OEB") file number EB-2014-0162. Milton Hydro seeks information with respect to any customer groups in Milton that have requested the assistance of VECC in the form of an intervention. VECC believes this is yet another in a line of unsuccessful attempts to limit the right of an intervenor to represent classes of customers in Ontario electricity and natural gas franchises proceedings in circumstances where the intervenor may have no individual members within the franchise area. As the Board found in the most recent cases, EB 2008-0238 and in EB2008=0237, the issue is whether the intervenor represents the interests it says it does. To quote from the Board decision contained in Procedural Order 1 of the EB 2008-0238 decision:

"The Board received correspondence from NOW on October 10, 2008 objecting to each Intervention request and questioning whether the parties applying to intervene represented interests in the area served by NOW. The Board has considered NOW's objections and the responses provided by VECC, SEC and AMPCO. The participation of intervenors is an important component of a rate proceeding. Each of these groups represents a significant consumer interest and the results of the proceeding will impact these consumers. The Board concludes that these parties should be granted intervenor status."

VECC, as its intervention notes, is a coalition composed of two member associations representing the interests of vulnerable energy consumers: The Federation of Metro Tenants Association (FMTA) and the Ontario Coalition of Senior Citizens Organizations (OCSCO). The FMTA indicates that it has one tenant group in Milton affiliated with it, although it is outside the Metro boundaries. OCSCO has over 500,000 members in 140 organizations throughout Ontario. It would be an onerous, if not impossible, task to discover which organizations contain Milton residents and how many there are. There is one OCSCO member organization based in Milton with 15,000 members, but it likely that all of those members do not reside in Milton. The wisdom of the Board's traditional approach to this issue is thus apparent. Both organizations, by the way, have easily accessible web sites where more information can be obtained.

If Milton wishes to pursue this line of objection/inquiry, we would have further submissions to make that would admittedly be largely repetitive of those advanced in response to previous objections over the last decade or so. VECC, however, submits that this is largely a settled matter.

Yours truly,

A handwritten signature in black ink, appearing to be 'Michael Janigan', written over a horizontal line.

Michael Janigan
Counsel for VECC