



PUBLIC INTEREST ADVOCACY CENTRE

LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC

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July 3, 2014

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: EB-2014-0073 - Festival Hydro Inc.
Notice of Intervention
Vulnerable Energy Consumers Coalition (VECC)**

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

email: Festival – Debbie Reece – dreece@festivalhydro.com

ONTARIO ENERGY BOARD

IN THE MATTER OF AN APPLICATION BY

FESTIVAL HYDRO INC.

2015 ELECTRICITY DISTRIBUTION RATES

NOTICE OF INTERVENTION

OF THE

VULNERABLE ENERGY CONSUMERS COALITION

To: Ms. Kirsten Walli
Board Secretary

And to: Festival - Ms. Debbie Reece

IDENTITY OF THE INTERVENOR AND ITS MEMBERSHIP

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.

INDIVIDUALS AUTHORIZED TO REPRESENT VECC IN THIS PROCEEDING

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.

GROUNDINGS FOR THE INTERVENTION

9. While the Applicant is not seeking an increase in 2015 in residential rates to customers represented by, or of similar interests, to those represented by VECC and by the associations affiliated with VECC, VECC is especially concerned with the ability of low income consumers to meet current energy costs. These costs on an annual basis continually exceed the rate of inflation. Accordingly, VECC will be seeking to ascertain whether further reductions in the Applicant's revenue requirement can be effected.

INTERESTS OF THE INTEVENOR

10. VECC notes that Festival Hydro Inc. (Festival) is seeking to have approved a revenue requirement that is 15% above 2010 Board approved levels, a rate base that is 57% over Board approved levels and an OM&A budget that is 29% above 2010 Board approved. VECC wishes to review the necessity for these increases for the 2015 test year.
4. VECC intends to review all aspects of the application including the reasonableness of capital programs, operating and maintenance costs, the allocation of costs to customer classes and the design of rates to recover these costs.

5. VECC has previously been approved as an intervenor in numerous proceedings related to Festival, including its last rate application EB-2009-0263.
13. 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 2015.

INTENTION TO SEEK COST AWARDS

6. 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).
7. 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, JULY 3, 2014