



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

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Michael Janigan  
Counsel for VECC

July 30, 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-2014-0195**  
**Enbridge Gas Distribution Inc. DVA Application**

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: Mr. Andrew Mandyam, Director Regulatory, Enbridge Gas Distribution Inc.

[EGDRegulatoryProceedings@enbridge.com](mailto:EGDRegulatoryProceedings@enbridge.com)

Mr. David Stevens, Aird & Berlis LLP

[dstevens@airdberlis.com](mailto:dstevens@airdberlis.com)

Mr. Colin Schuch, Board Staff

[Colin.shuch@ontarioenergyboard.com](mailto:Colin.shuch@ontarioenergyboard.com)

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF AN APPLICATION BY**

**ENBRIDGE GAS DISTRIBUTION INC.**

**2014 DEFERRAL & VARRIANCE ACCOUNT APPLICATION**

**NOTICE OF INTERVENTION**

**OF THE**

**VULNERABLE ENERGY CONSUMERS COALITION**

To: Ms. Kirsten Walli  
Board Secretary

And to: Mr. Andrew Mandyam, Enbridge Gas Distribution, Regulatory Affairs

**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](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)  
[markgarner@rogers.com](mailto:markgarner@rogers.com)

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 and Mr. Garner at their respective e-mail addresses.

## **GROUND FOR THE INTERVENTION**

9. The Enbridge Gas Distribution Gas Inc. (“EGD”) is seeking to dispose of significant balances in certain deferral and variance accounts (“DVA”). The disposition or continuation of these accounts will impact customers represented by, or of similar interests to, those represented by VECC and by the associations affiliated with VECC.

## **INTERESTS OF THE INTEVENOR**

10. VECC is especially concerned with the ability of low income consumers to meet energy costs which continually exceed the rate of inflation. The prudence of the DVA amounts and the timing and nature of their disposition are of direct interest to the consumers represented by VECC.
11. VECC intends to review all aspects of the DVA Application including the reasonableness of the amounts and method of disposition.
12. VECC has previously been approved as an intervenor in numerous proceedings related to EGD, including its recent rate application EB-2012-0459.
13. VECC is intervening in order to ensure that consumer interests and in particular the interests of the low-income and vulnerable users of natural gas are fully represented in the determination of just and reasonable rates.

## **INTENTION TO SEEK COST AWARDS**

14. 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).

15. 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 30, 2014**