



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

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

Tel: (613) 562-4002. Fax: (613) 562-0007. e-mail: piac@piac.ca. <http://www.piac.ca>

Michael Janigan
Counsel for VECC

September 4, 2014

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-2014-0116 - Toronto Hydro-Electric System Limited
CIR Application 2015-2019 Application
Notice of Intervention of 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: THESL - Rob Barrass - regulatoryaffairs@torontohydro.com

ONTARIO ENERGY BOARD

IN THE MATTER OF AN APPLICATION BY

TORONTO HYDRO-ELECTRIC SYSTEM LIMITED CUSTOMER IR

2015-2019 ELECTRICITY DISTRIBUTION RATES

NOTICE OF INTERVENTION

OF THE

VULNERABLE ENERGY CONSUMERS COALITION

To: Ms. Kirsten Walli
Board Secretary

And to: Mr. Rob Barrass, Manager and Counsel, 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

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

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.

GROUND FOR THE INTERVENTION

9. The Applicant is seeking to increase the 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 energy costs which on an annual basis exceed the rate of inflation.

INTERESTS OF THE INTEVENOR

10. VECC notes that Toronto Hydro-Electric System Limited (Toronto Hydro) proposes a significant increase in capital spending over the term of the rate plan. The proposed 2015 rate base is over 30% greater than last approved by the Board in 2011. The Applicant is also seeking a 14% increase in operating and maintenance costs as compared to the last rebasing with further increases in each year of the plan. This is the first application by Toronto Hydro made under the Board's RRFE Framework.
11. The Applicant proposes to significantly raise the rates to residential consumers over the next 5 years. The proposed capital spending has

- implications for higher rates beyond that. 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. VECC will also test whether the plan meets the criteria established by the Board under the RRFE framework and whether it provides for just and reasonable rates to consumers.
12. VECC has previously been approved as an intervenor in numerous proceedings related to Toronto Hydro, including its recent ICM rate application EB-2012-0064. VECC has also been represented at the pre-filing stakeholder conferences of the Applicant.
 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 and beyond.

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, SEPTEMBER 4, 2014