



PUBLIC INTEREST ADVOCACY CENTRE
LE CENTRE POUR LA DÉFENSE DE L'INTÉRÊT PUBLIC

January 5, 2015

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-2014-0182 - Union Gas Limited Burlington Oakville Pipeline Project
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.

Thank you.

Yours truly,

Michael Janigan
Counsel for VECC

Cc: Union Gas - Vanessa Innis - vinnis@uniongas.com

ONTARIO ENERGY BOARD
IN THE MATTER OF AN APPLICATION BY
UNION GAS LIMITED
2015 ELECTRICITY DISTRIBUTION RATES
NOTICE OF INTERVENTION
OF THE
VULNERABLE ENERGY CONSUMERS COALITION

To: Ms. Kirsten Walli

Board Secretary

And to: Ms. Vanessa Innis, Manager, Regulatory Initiatives

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.

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

5. The name and address of the agent authorized to receive documents on behalf of VECC is:

Mr. Michael Janigan
Counsel
Public Interest Advocacy Centre
31 Hillside Avenue, East
Toronto, ON
M4S 1T4
416-840-3907
mjanigan@piac.ca

6. 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

7. 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 are sent to Mr. Janigan and Mr. Garner at their respective e-mail addresses.

GROUND FOR THE INTERVENTION

8. 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 continually exceed the rate of inflation.

INTERESTS OF THE INTEVENOR

9. VECC notes that Union Gas Limited's ("Union) proposal will replace existing third party facilities. The Application also presupposes increases in demand for natural gas. Union states that the costs to develop this pipeline are less than the current arrangements made through the secondary transportation markets. The \$119 million cost of the project is not insignificant and Union seeks a deferral account to record its spending.
10. VECC intends to review all aspects of the Application including the reasonableness of:
(a) cost-benefit analysis of the project; (b) the establishment of new deferral, (c) the proposed cost allocations of project costs, and (d) whether the project meets the capital pass through criteria under Union's current rate plan.
11. VECC has previously been approved as an intervenor in proceedings related to Union.
12. 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

13. 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).

14. 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.

***** End of Document*****