



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

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October 29, 2015

**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)**  
**EB-2015-0238 Distributor Gas Supply Planning Consultation**  
**Cost Awards**

Request to Participate

VECC is seeking to participate in the above noted proceeding. VECC has been a participant in a number of Board policy proceedings including EB-2014-0189, EB-2014-0227, EB-2014-0158 and EB-2015-0006). Our current Annual Filing can be found on the Board's website at:

[http://www.ontarioenergyboard.ca/oeb/\\_Documents/Intervenor\\_Filings/VECC\\_2014\\_annual\\_intervenor\\_filing\\_20140605.pdf](http://www.ontarioenergyboard.ca/oeb/_Documents/Intervenor_Filings/VECC_2014_annual_intervenor_filing_20140605.pdf)

VECC has also been active in all the recent gas supply related proceedings of the Board, including those dealing with the building of new infrastructure in order to facilitate Ontario receiving gas supply from the Utica/Marcellus basin.

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 rising energy costs. In this case VECC is concerned with the cost consequences of changes to natural gas contracting that are occurring in

the Ontario franchises due to changes in supply sources and transportation arrangements to source natural gas from the Marcellus Basin.

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).

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. VECC will be requesting cost awards for its participation in this proceeding.

#### Issues to Address

VECC believes among the issues that should be addressed are:

- Fuel poverty, natural gas bill assistance for low-income consumers;
- Natural gas price transparency;
- QRAM and its possible replacement;
- Impact of Dawn pricing;
- Changes to the Ontario transportation infrastructure to efficiently access Utica/Marcellus natural gas;
- Comparison of Union Gas and Enbridge Gas' gas procurement policies to seek best practices; and,
- DSM impacts on gas supply planning.

#### Contact

Individuals authorized to present VECC in this proceeding are:

Mr. Michael Janigan (Counsel)  
31 Hillsdale Avenue  
Toronto, Ontario  
M4S 1T4  
Mr. Janigan's Direct line: 416-840-3907

[mjanigan@piac.ca](mailto:mjanigan@piac.ca)

PIAC Office: 613- 562-4002 (Donna Brady)

VECC requests 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  
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Yours truly,



Michael Janigan  
Counsel for VECC

cc: Mr. Jason Craig, Ontario Energy Board  
e-mail: [Jason.craig@ontarioenergyboard.ca](mailto:Jason.craig@ontarioenergyboard.ca)

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