



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

March 15, 2016

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: Vulnerable Energy Consumers Coalition (VECC)
Request for Intervention/Registration EB-2015-0363
Ontario Energy Board Consultation to Develop a Regulatory Framework
for Natural Gas Distributors Cap and Trader Compliance Plans**

Please find enclosed the Vulnerable Energy Consumers Coalition (VECC) request for intervention/registration with respect to the above-noted proceeding.

Yours truly,

A handwritten signature in black ink, appearing to read 'Michael Janigan', is positioned above the typed name.

Michael Janigan
Counsel for VECC

ONTARIO ENERGY BOARD

To: Ms. Kirsten Walli
Board Secretary

IDENTITY OF THE INTERVENOR AND ITS MEMBERSHIP

1. The Vulnerable Energy Consumers Coalition (VECC) hereby expresses its request 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
Special Counsel
Regulatory and Consumer Affairs
Public Interest Advocacy Centre (PIAC)
31 Hillsdale Ave. East
Toronto, Ontario
M4S1T4
416 840-3907
mjanigan@piac.ca

7. VECC would request that all correspondence and documentation also be electronically copied to VECC's consultants:

Mark Garner
Econalysis Consulting Services
34 King Street East, Suite 630
Toronto, Ontario
M5C 2X8
(416) 348-0640 (office)
(416) 348-0641 (fax)
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.

GROUNDINGS FOR THE INTERVENTION

9. VECC's client is directly affected by the costs associated with the proposed Ontario cap and trade program reflected in the rates for natural gas service. VECC seeks to ensure that appropriate input to this consultation is made on behalf of VECC's client through VECC's participation.
10. VECC intends to participate in stakeholder discussions and provide submissions to the Board associated with this consultation.
11. VECC has previously been approved as an intervenor in virtually all major natural gas distribution cases over the past two decades.
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 over the course of this consultation.

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.

DATED AT TORONTO, MARCH 15, 2016