



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

July 5, 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: EB-2016-0152 - Ontario Power Generation Inc.
2017 Payment Amounts Application
Vulnerable Energy Consumers Coalition (VECC) - Request for Intervention**

VECC respectfully requests that the Board grant it intervenor status in the above-noted proceeding.

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: OPG – Chris Fralick – chris.fralick@opg.com

ONTARIO ENERGY BOARD
IN THE MATTER OF AN APPLICATION BY
ONTARIO POWER GENERATION INC. (OPG)
PAYMENT AMOUNTS 2017-2021
NOTICE OF INTERVENTION
OF THE
VULNERABLE ENERGY CONSUMERS COALITION

To: Ms. Kirsten Walli
Board Secretary

And to: Chris Fralick
Vice President, Regulatory Affairs
Ontario Power Generation Inc.

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.

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 Hillside Ave, East
Toronto, ON
M4S1T4
416-840-3907 (office)
(email) mjanigan@piac.ca

6. VECC would request that all correspondence and documentation also be copied to VECC's consultant:

Mark Garner (project manager)
Econalysis Consulting Services
34 King Street East, Suite 630
Toronto, Ontario
M5C 2X8
647-408-4501 (office)
markgarner@rogers.com

7. VECC requests that electronic copies be sent to both Mr. Janigan and Mr. Garner at their respective e-mail addresses.
8. VECC notes that it has previously been approved as an intervenor in payment amounts proceedings related to Ontario Power Generation Inc.
9. 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 the rates which flow from the Application for 2017 and beyond. In particular, VECC will be engaged in the OEB process of regulatory scrutiny of :
- (a) The prudence and quantum of the payment amounts for hydro-electric and nuclear generating facilities for the requisite period;
 - (b) The proposed method for recovery of those amounts and the effective date for the same;
 - (c) The changes to the Applicant's cost of capital;

- (d) Such further and other matters affecting the interests of the customers represented by VECC that may be associated with the determination of the issues of this application.

10. VECC is initially of the opinion that an oral hearing of this application will be required.

11. 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).

12. 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 5, 2016