***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

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Counsel for VECC

August 2, 2016 **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)**

**Request for Intervention/Registration EB-2014-0255**

**Ontario Energy Board Consultation to Develop Corporate Governance Guidelines for OEB Regulated Utilities**

Please find enclosed our request for approval of the late intervention/registration of VECC with eligibility for receipt of a cost award in the above-noted proceeding. A careful review of the documents filed, and an exchange of information with parties currently registered in this proceeding, has led us to believe that VECC can make a useful contribution to the record of this proceeding. We understand that the July 11 deadline is passed for such an intervention, but believe that this request will not prejudice the interests of the parties herein, or unduly delay the process. We apologize for any inconvenience associated with our late request.

Yours truly,



Michael Janigan

Counsel for VECC

**EB-2014-0255**

**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:

1. The Federation of Metro Tenants Association (FTMA)
2. 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-oops. 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

1. 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.
2. 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**

1. 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

1. 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

1. 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.

**GROUNDS FOR THE INTERVENTION**

1. VECC’s constituencies are directly affected by the policies and costs associated with the implementation of corporate governance guidelines that may be adopted as a result of this proceeding. Such guidelines may have an important effect on both the delivery and cost of energy services, as well as the utilities’ ability to cope with change, particularly in the electricity distribution sector. VECC seeks to ensure that appropriate input to this consultation is made on behalf of VECC’s constituencies through VECC’s participation.
2. VECC intends to participate in any stakeholder discussions and provide submissions to the Board associated with this consultation.
3. VECC has previously been approved as an intervenor in many OEB initiatives to develop industry-wide guidelines over the past two decades.
4. VECC is intervening in order to ensure that consumer interests and, in particular, the interests of the low-income and vulnerable energy users are fully represented in this consultation.

**INTENTION TO SEEK COST AWARDS**

1. VECC would 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).
2. 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, August 2, 2016**