



PUBLIC INTEREST ADVOCACY CENTRE
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March 14, 2017

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-2016-0351 Natural Gas Resources Limited (NRG) for relief to transfer its natural gas distribution system to EPCOR Natural Gas Limited Partnership (EPCOR).
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 as well as their Counsel.

Yours truly,

A handwritten signature in black ink, appearing to read 'Cynthia Khoo', is written in a cursive style.

Cynthia Khoo
Counsel for VECC

Mr. Brian Lippold, General Manager NRG
Email: Brian@nrgas.on.ca
Mr. Bruce Brandell, Director Commercial Services, EPCOR
bbrandell@epcor.com
Sander Duncanson, Counsel to NRG
sduncanson@osler.com
Britt Tan, Legal Counsel, EPCOR
btan@epcor.com

1204-ONE Nicholas Street, Ottawa, ON K1N 7B7 Tel: 613-562-4002 Fax: 613-562-0007 piac@piac.ca; www.piac.ca
Cynthia Khoo: Direct: 1139 College Street, Toronto, ON M6H 1B5 Tel: 604-725-5484 ckhoo@piac.ca

**ONTARIO ENERGY BOARD
IN THE MATTER OF AN APPLICATION BY
NATURAL RESOURCE GAS LIMITED (NRG)
FOR RELIEF TO TRANSFER ITS NATURAL GAS DISTRIBUTION SYSTEM TO
EPCOR NATURAL GAS LIMITED PARTNERSHIP (EPCOR)**

**NOTICE OF INTERVENTION
OF THE
VULNERABLE ENERGY CONSUMERS COALITION**

To: Ms. Kirsten Walli, Board Secretary

And to: **Mr. Brian Lippold, General Manager, NRG**

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 (FMTA)
 - (b) The Ontario Coalition of Senior Citizens' Organizations (OCSCO)

2. The Federation of the Metro Tenants Association (the "FMTA") 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.
6. VECC is a frequent intervenor in Board proceedings. Our annual information filing can be found on the Board's website at:
<http://www.ontarioenergyboard.ca/oeb/Industry/Regulatory+Proceedings/Applications+Before+the+Board/Annual+Filings+-+Frequent+Intervenors>

INDIVIDUALS AUTHORIZED TO REPRESENT VECC IN THIS PROCEEDING

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

Cynthia Khoo
External Counsel, Regulatory Affairs
Public Interest Advocacy Centre (PIAC)
1139 College Street
Toronto, ON M6H 1B5
604-725-5484
ckhoo@piac.ca

PIAC Office: 613-562-4002 (Donna Brady) Ext. 21

8. 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
M5C 2X8
647-408-4501 (office)
markgarner@rogers.com

9. 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 Ms. Khoo, Mr. Harper and Mr. Garner at their respective e-mail addresses.

GROUNDS FOR THE INTERVENTION

10. 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

11. VECC is currently a party to NRG's 2016 cost of service rate application, EB-2016-0236. On January 30, 2016 this application was put into abeyance after notification of the pending transaction and the request of NRG.
12. VECC's interests are to ensure the proposed transaction is to the benefit of NRG's consumers and that no harm results from the proposed transaction.
13. VECC also notes that the application makes certain proposals with respect to the establishment of NRG rates therefore our interests in EB-2016-0236 may be affected by the disposition of this application.

INTENTION TO SEEK COST AWARDS

14. 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).
15. 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 14, 2017