



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

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October 19, 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-2017-0087 – Union Gas Limited – 2018 Rate Application  
Intervention by the 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.

Yours truly,

Cynthia Khoo  
Counsel for VECC

Cc: Adam Stiers, Manager, Regulatory Initiatives  
[AStiers@uniongas.com](mailto:AStiers@uniongas.com)

**ONTARIO ENERGY BOARD  
IN THE MATTER OF AN APPLICATION BY  
UNION GAS LIMITED  
2018 RATE APPLICATION**

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

To: Ms. Kirsten Walli, Board Secretary

And to: **Adam Stiers, Manager, Regulatory Initiatives**

**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 (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.
6. VECC is a frequent intervenor in Board proceedings. Our annual information filing can be found on the Board's website at:

<https://www.oeb.ca/industry/applications-oeb/intervenor-information/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  
Counsel  
Public Interest Advocacy Centre (PIAC)  
One Nicholas Street, Suite 1204  
Ottawa, Ontario  
K1N 7B7  
Ms. Khoo direct line:  
[ckhoo@piac.ca](mailto:ckhoo@piac.ca)

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

8. VECC requests that all correspondence and documentation also be electronically copied to VECC's consultants:

Mark Garner (Project Consultant)  
Econalysis Consulting Services  
34 King Street East, Suite 630  
Toronto, Ontario  
M5C 2X8  
647-408-4501 (office)  
[markgarner@rogers.com](mailto: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 Cynthia Khoo and Mark Garner at their respective e-mail addresses.

#### **GROUND 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. Union Gas Limited (Union) proposes to adjust rates in accordance with the Board approved agreement setting out multi-year incentive ratemaking mechanisms for the years 2014-2018. VECC was a party to that agreement (EB-2013-0202/EB-2014-0271). VECC has been granted intervenor status in all subsequent rate year adjustments under the multi-year plan including the prior 2017 rates EB-2016-0245. VECC's interests are to see that the implementation of rates is in accordance with the Board approved agreement.
12. In addition to the formulaic rate adjustment Union is proposing to include the actual costs of the Panhandle Project. Union is also proposing to implement changes to Union North storage and transportation rates and update Rates M12 and M13. VECC expects to critically review all aspects of this application to ascertain if they are, in our view, in the public interest.
13. 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 in the determination of just and reasonable rates.

#### **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, OCTOBER 19, 2017**