



PUBLIC INTEREST ADVOCACY CENTRE
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December 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-2017-0307 –Enbridge Gas Distribution Inc. and Union Gas Limited –
Amalgamated Rates Application
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.

Yours truly,

Ben Segel-Brown

Counsel for VECC

Andrew Mandyam – egdregulatoryproceedings@enbridge.com

Mark Kitchen – unionregulatoryproceedings@uniongas.com

Fred Cass– fcass@airdberlis.com

**ONTARIO ENERGY BOARD
IN THE MATTER OF AN APPLICATION BY
ENBRIDGE GAS DISTRIBUTION INC.
AND
UNION GAS LIMITED**

**RATE SETTING MECHANISM
PURSUANT TO SECTION 36 OF
*THE ONTARIO ENERGY BOARD ACT, 1998***

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

To: Ms. Kirsten Walli, Board Secretary

And to: **Andrew Mandyam, Enbridge Gas Distribution (EGD)**
Mark Kitchen, Union Gas Limited (Union)

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:

<https://www.oeb.ca/industry/applications-oeb/intervenor-information/annual-filings-frequent-intervenors>

INDIVIDUALS AUTHORIZED TO REPRESENT VECC IN THIS PROCEEDING

7. VECC requests that electronic copies of the application and any further additional supporting materials be sent to the following counsel at their respective email addresses:

Ben Segel-Brown
External Counsel, Regulatory Affairs
Public Interest Advocacy Centre (PIAC)
One Nicholas Street, Suite 1204
Ottawa, Ontario
K1N 7B7
613- 562-4002 ext. 29
bsegel-brown@piac.ca

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

8. We also request that the same 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

GROUND'S FOR THE INTERVENTION

9. The amalgamation of Enbridge Gas Inc. (EGD) and Union Gas Limited (Union) is the biggest change to the corporate structure of Ontario's natural gas sector in the Province's history. The rate making mechanism associated with the proposed amalgamation (EB-2017-0306) would, if approved, deprive ratepayers of an opportunity to have the amalgamated utilities costs reviewed for a 15 year period (2015 to 2029). Therefore this proposal has the potential to negatively affect residential natural gas consumers of Ontario and to deprive them of the benefits of efficiencies in the natural gas sector.
10. It is VECC's intention to seek intervenor status in both the proposed amalgamation (0306) and this application (0307) as they are inextricably linked. VECC has been a party to a number of proceedings of both of the applicants, including all prior rate applications of these gas utilities.
11. VECC interests are on the proposed rate setting methodology, the applicability of the Board's rate making MAADs policy as they apply to the Electricity distribution sector, the capital spending plans of the amalgamated utilities and how the proposal will address future gas cost and supply plans.

INTERESTS OF THE INTEVENOR

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 in the determination of just and reasonable rates.

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, DECEMBER 19, 2017