



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

January 22, 2018

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-2017-0045 Halton Hills Hydro Inc.
2018 IRM Electricity Rate Application
Notice of Intervention of Vulnerable Energy Consumers Coalition (VECC)**

In response to Halton Hill Hydro's Letter of Objection filed January 19, 2018 to VECC's intervention, VECC wishes to explain that the late filing was due to an oversight on VECC's part given the timing of the January 2, 2018 deadline for intervention requests which coincided with the December break and VECC's consultant being out of the country until the second week of January. Further, VECC apologizes for an incorrect reference to another utility in its Letter of Intervention and has attached a corrected version to this letter.

Yours truly,

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

Cynthia Khoo
Counsel for VECC

Cc: David Smelsky, Halton Hills Hydro Inc.

**ONTARIO ENERGY BOARD
IN THE MATTER OF AN APPLICATION BY
HALTON HILLS HYDRO INC.
2018 IRM APPLICATION
NOTICE OF INTERVENTION
OF THE
VULNERABLE ENERGY CONSUMERS COALITION**

To: Ms. Kirsten Walli, Board Secretary

And to: Mr. David J. Smelsky, CFO

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:

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. We also request that the same be electronically copied to VECC's consultants:

Shelley Grice (project manager)
Econalysis Consulting Services
34 King Street East, Suite 630
Toronto, Ontario
M5C 2X8
647-880-9942 (office)
shelley.grice@rogers.com

GROUNDS FOR THE INTERVENTION

9. Halton Hills Hydro Inc. has applied to establish an account and dispose of amounts in the account to remedy an error in the calculation of depreciation expense that Halton Hills Hydro says underpins its current rates. Halton Hills Hydro Inc. also applied for a Z-Factor to recover costs incurred as a result of a pay equity settlement agreement between Halton Hills Hydro Inc. and Power Worker’s Union, CUPE Local 1000.

INTERESTS OF THE INTEVENOR

10. 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 just and reasonable rates.

INTENTION TO SEEK COST AWARDS

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, JANUARY 22, 2018