



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

March 8, 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-2017-0224; EB-2017-0255; EB-2017-0275
Enbridge Gas Distribution Inc., Union Gas Limited, and EPCOR Natural Gas Limited Partnership
Applications for approval of the cost consequences of 2018 cap and trade compliance plans
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 Applicants. Due to changes with VECC legal counsel, the notice of application to this proceeding did not get to the intended party or was overlooked. We apologize for the delay in seeking intervener status. We accept the record as filed.

Yours truly,

Ben Segel-Brown

Counsel for VECC

Valerie Bennet: Valerie.Bennett@oeb.ca
Ljuba Djurdjevic: Ljuba.Djurdjevic@oeb.ca
Lawren Murray: Lawren.Murray@oeb.ca

**ONTARIO ENERGY BOARD
IN THE MATTER OF**

**EB-2017-0224
EB-2017-0255
EB-2017-0275**

**ENBRIDGE GAS DISTRIBUTION INC., UNION GAS
LIMITED, AND EPCOR NATURAL GAS LIMITED
PARTNERSHIP**

**APPLICATIONS FOR APPROVAL OF THE COST
CONSEQUENCES OF 2018 CAP AND TRADE
COMPLIANCE PLANS**

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

To: Ms. Kirsten Walli, Board Secretary

And to: Valerie Bennet, Case Manager
Ljuba Djurdjevic, OEB Counsel
Lawren Murray

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 and Public Policy
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

Jennifer Chow
Articling Student
Public Interest Advocacy Centre (PIAC)
One Nicholas Street, Suite 1204
Ottawa, Ontario
K1N 7B7
613- 562-4002 ext. 29
bsegel-brown@piac.ca

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

GROUNDS FOR THE INTERVENTION

9. Low-income consumers have a significant and distinct interest in many of the issues raised in the final issues list, particularly the customer abatement activates and underlying principles being approved as part of the Applicant's Compliance Plan.¹
10. VECC is concerned that unlike the Applicant's existing customer abatement programs which reduce costs for consumers and are accessible to low-income consumers, many of the proposed customer abatement activities are simply expenditures to reduce emissions or investments in high-cost technologies and products which will not reduce costs for consumers and will only benefit the high-income consumers and business able to afford the technology or product.
11. VECC believes that in determining whether the Applicant's compliance play options analysis is reasonable (Issue 1.4), the Board is required to consider consumer's economic circumstances under s 2.5 of the *Ontario Energy Board Act*. Vulnerable consumers are also impacted by rate increase resulting from this proceeding and by the allocation of those rate increases.

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.

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 retain legal counsel and qualified consultants for VECC 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 OTTAWA, MARCH 8, 2018

¹ Ex. EB-2017-0224 Exhibit C, Tab 5 Schedule 2