



PUBLIC INTEREST ADVOCACY CENTRE
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April 12, 2018

VIA E-MAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge St.
Toronto, ON

Dear Ms. Walli:

**Re: EB-2017-0194 Hydro One East-West Tie Station Upgrade
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. Given the inextricable relationship between proceedings VECC also intends to seek late intervenor status in the Upper Canada Transmission Inc. Leave to Construct Application EB-2017-0182. As such we accept the record as filed to date.

Yours truly,

Ben Segel-Brown

Counsel for VECC

egdregulatoryproceedings@enbridge.com
regulatory@hydroone.com

**ONTARIO ENERGY BOARD
IN THE MATTER OF AN APPLICATION BY
HYDRO ONE EAST-WEST TIE STATION PROJECT
NOTICE OF INTERVENTION OF THE
VULNERABLE ENERGY CONSUMERS COALITION**

To: Ms. Kirsten Walli, Board Secretary

And to: **Mr. Frank D'Andrea, Vice President, Chief Regulatory Officer**

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
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

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. Upper Canada Transmission Inc., operating as NextBridge Infrastructure (NextBridge) filed an application on July 31, 2017 and subsequent to it being designated by the OEB in August 2013 (EB-2011-0140/EB-2015-0216) to complete an “East-West Tie” to transmit electricity between Thunder Bay and Wawa Ontario. NextBridge has filed a notice of motion seeking to dismiss or otherwise make moot Hydro One’s Lake Superior Link application which would serve the same purpose in lieu of the NextBridge proposal. The application in question – to upgrade transmission facilities related to the East-West Tie- is part of the overall project. For completeness VECC is requesting intervention status in this proceeding.
10. The application filed by NextBridge includes updated costs that are significantly higher than the prior estimates provided to the Board. The Minister of Energy has subsequently sought to have the Independent Electricity System Operator update its assessment of the need for the project (August 4, 2017).
11. VECC is intervening in this proceeding in light of the significant impact the project may have on ratepayers, and especially low income ratepayers in Ontario.

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 electricity are fully represented in the determination of just and reasonable rates.
13. As a regular intervenor in electricity distribution and transmission rate cases that impact low income consumers VECC is also concerned with the regulatory process used in this matter. Specifically VECC wishes to understand if a designated provider may use the its monopoly position granted by the Board to inordinately raise the cost of providing electricity service.

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, APRIL 12, 2018