



PUBLIC INTEREST ADVOCACY CENTRE  
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June 13, 2018

VIA E-MAIL

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

Dear Ms. Walli:

**Re: EB-2018-0028**  
**Energy + Inc. 2019 Distribution Rates**  
**Notice of Intervention of Vulnerable Energy Consumers Coalition (VECC)**

Please find enclosed the Notice of Intervention of VECC in the above-noted proceeding.

Yours truly,

*Ben Segel-Brown*

Counsel for VECC

Ms. Sarah Hughes, CFO Energy+ [shughes@energyplus.ca](mailto:shughes@energyplus.ca)

**ONTARIO ENERGY BOARD  
IN THE MATTER OF AN APPLICATION BY**

**ENERGY + INC.  
2019 DISTRIBUTION RATES**

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

To: Ms. Kirsten Walli, Board Secretary

**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:

John Lawford  
Counsel to VECC  
c/o Public Interest Advocacy Centre (PIAC)  
One Nicholas Street, Suite 1204  
Ottawa, Ontario  
K1N 7B7  
613- 562-4002 ext. 25  
[lawford@piac.ca](mailto:lawford@piac.ca)

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

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](mailto:markgarner@rogers.com)

AND

Bill Harper  
Econalysis Consulting Services  
34 King Street East, Suite 630  
Toronto, Ontario  
M5C 2X8  
416-348-0193 (office)  
[bharper@econalysis.ca](mailto:bharper@econalysis.ca)

#### **GROUND FOR THE INTERVENTION**

9. VECC has been a regular intervenor in prior applications of the Applicant (Cambridge and North Dumfries Hydro and Brant County Power Inc.) including their last cost of service applications EB-2013-0116. This will be the first cost of service application of the combined entity.
10. While Energy+ has over the prior rate period shown the ability to reduce its operating and maintenance expenditures this application proposes a significant increases in those costs to be included in rates. VECC also notes that Energy+ is seeing approval of an Advanced Capital Module (“ACM”) and recovery of significant capital expenditures related to office and other buildings. In addition VECC wishes to explore any issues arising from the accounting of the two merged utilities.
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 precedent that may be set by this application.

#### **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, JUNE 13, 2018**