



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

June 18, 2018

VIA E-MAIL

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

Dear Ms. Walli:

Re: EB-2018-0143
Independent Electricity System Operator 2018 Fees
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,

J. Lawford

Counsel for VECC

Ms. Miriam Heinz, IESO Regulatory Affairs regulatoryaffairs@ieso.ca

**ONTARIO ENERGY BOARD
IN THE MATTER OF AN APPLICATION BY
INDEPENDENT ELECTRICITY SYSTEM
OPERATOR (IESO)**

**2018 EXPENDITURE AND REVENUE REQUIREMENT
SUBMISSION
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, Regulatory and Public Policy
Public Interest Advocacy Centre (PIAC)
One Nicholas Street, Suite 1204
Ottawa, Ontario
K1N 7B7
613- 562-4002 ext. 25
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

GROUNDS FOR THE INTERVENTION

9. The IESO is proposing to recover costs of \$190.8M in 2018 which are in excess of the actual 2017 costs incurred of \$183.3M. Total capital projects projected for 2018 (26.2M) are also significantly in excess of those incurred in 2017 (15.6M). VECC will explore the reasons for the increases requested for 2018. VECC has also been a party to prior applications by the IESO including its last fee application EB-2017-0150.

INTERESTS OF THE INTERVENOR

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.
11. VECC intends to focus on the proposed 2018 expenditures and revenue requirement and compliance with agreement made with intervenors, including VECC, and approved by the Board as part of the EB-2017-0150 Fees Application.

INTENTION TO SEEK COST AWARDS

12. 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).
13. 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 18, 2018