



PUBLIC INTEREST ADVOCACY CENTRE
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January 10, 2019

VIA E-MAIL

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

Dear Ms. Walli:

**Re: EB-2018-0242 – Application by Peterborough Distribution Inc. for Approval to Amalgamate with Peterborough Utilities Services Inc. and then Sell its Electricity Distribution System to Hydro One Networks Inc.
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.

We appreciate that Notices of Intervention were due yesterday but due to inadvertence and the holiday break VECC is filing late. We submit that the respondent and any other interveners would not be prejudiced by this minor delay.

Yours truly,

John Lawford

Counsel for VECC

Peterborough - John Stephenson - jstephenson@peterboroughutilities.ca
HONI - Linda Gibbons - regulatory@HydroOne.com

2-285 McLeod Street, Ottawa, ON K2P 1A1 Tel: 613-562-4002 fax: 613-562-0007 www.piac.ca
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ONTARIO ENERGY BOARD
IN THE MATTER OF AN APPLICATION BY
PETERBOROUGH DISTRIBUTION INC. FOR APPROVAL TO
AMALGAMATE WITH PETERBOROUGH UTILITIES SERVICES INC. AND
THEN SELL ITS ELECTRICITY DISTRIBUTION SYSTEM TO HYDRO ONE NETWORKS INC.

NOTICE OF INTERVENTION
OF THE
VULNERABLE ENERGY CONSUMERS COALITION

To: **Ms. Kirsten Walli, Board Secretary**

And to: **Ms. Linda Gibbons, Sr. Regulatory Coordinator, Hydro One Networks Inc.**
John Stephenson, President & CEO, Peterborough Distribution Inc.

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. 2

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:

<http://www.ontarioenergyboard.ca/oeb/Industry/Regulatory+Proceedings/Applications+Before+the+Board/Annual+Filings+-+Frequent+Intervenors>

INDIVIDUALS AUTHORIZED TO REPRESENT VECC IN THIS PROCEEDING

7. The name & address of the agent authorized to receive documents on behalf of VECC is:

John Lawford
Counsel, Regulatory and Public Policy
Public Interest Advocacy Centre (PIAC)
285 McLeod Street, Suite 200
Ottawa, Ontario
K2P 1A1
Direct Line: 613- 562-4002 ext. 25
Email: lawford@piac.ca
PIAC Office: 613- 562-4002 (Donna Brady) Ext. 21

8. VECC requests that all correspondence and documentation also be electronically copied to VECC's consultant:

Bill Harper
107 Baker Ave.
Richmond Hill, Ontario
L4C 1X5
Direct Line: 905-883-1727
Email: bharper.consultant@bell.net

9. In addition, VECC requests that one paper copy of the Application be forwarded to Mr. Harper.

GROUNDINGS FOR THE INTERVENTION

10. The Application will ultimately result in the assets of Peterborough Distribution Inc.(PDI) being transferred to and integrated with Hydro One Networks' existing distribution system and eventually the integration of the setting of the rates for customers in the PDI service territory with Hydro One Networks' rates for its existing customer base. As a result, approval of the Application will affect both the provision of service and the rates to customers represented by, or of similar interests, to those represented by VECC and by the associations affiliated with VECC. VECC is especially concerned with the ability of low income consumers to meet rising energy costs which on an annual basis continually exceed the rate of inflation.

INTERESTS OF THE INTEVENOR

11. VECC was a party to PDI's last cost of service-based rate application (EB-2012-0160) and to Hydro One Networks' recent 2018-2022 Customer IR Application (EB-2017-0049). VECC has also been a party to previous MAAD applications involving Hydro One Networks (e.g., EB-2016-0276).

13. VECC is intervening in order to ensure that consumer interests and in particular the interests of the low-income and vulnerable users of electricity gas are fully represented in the consideration of the current 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 OTTAWA, JANUARY 10, 2019