



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

March 22, 2019

VIA E-MAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
Toronto, ON

Dear Ms. Walli:

**Re: Ontario Energy Board Policy Consultative – Request for participation and eligibility for costs
EB-2018-0287 – Utility Remuneration
EB-2018-0288 -Responding to DERs**

Please find attached the Notice of Intervention of VECC in the above-noted proceeding. As per the Board's letter of March 15, 2019 we have also included our request to be eligible for an award of costs.

Yours truly,

John Lawford

Original signed

Counsel for VECC

Cc: Lenore Robson: Lenore.Robson@oeb.ca
Rachel Anderson: Rachel.Anderson@oeb.ca

2-285 McLeod Street, Ottawa, ON K2P 1A1 Tel: 613-562-4002 Fax: 613-562-0007 www.piac.ca
John Lawford – Direct Telephone 613-447-8125 jlawford@piac.ca

ONTARIO ENERGY BOARD

EB-2018-0287 - Utility Remuneration

EB-2018-0288 - Responding to DERs

REQUEST TO PARTICIPATE
BY THE
VULNERABLE ENERGY CONSUMERS COALITION

To: Ms. Kirsten Walli, Board Secretary

And to: **Ms. Lenore Robson – Policy Advisor, Ontario Energy Board**
Ms. Rachel Anderson – Policy Advisor, Ontario Energy Board

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

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.

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.

VECC is a frequent intervenor in Board proceedings. Our annual information filing can be found on the Board's website at:

http://ontarioenergyboard.ca/oeb_Documents/Intervenor_Filings/VECC_2014_annual_intervenor_filing20140605.pdf

INDIVIDUALS AUTHORIZED TO REPRESENT VECC IN THIS PROCEEDING

The name & address of the agent authorized to receive documents on behalf of VECC for both policy consultatives is:

John Lawford
Counsel, Regulatory and Public Policy
Public Interest Advocacy Centre (PIAC)
2-285 McLeod Street
Ottawa, Ontario
K1N 7B7
613- 562-4002 ext. 25
jlawford@piac.ca

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

For Consultative EB-2018-0287 – Utility Remuneration

Attn: Lenore Robson

VECC requests that all correspondence and documentation also be electronically copied to:

Mark Garner (project consultant)
647 Broadway Ave.
Toronto, Ontario
M4G 2S8
647-408-4501 (office)
markgarner@rogers.com

For Consultative EB-2018-0288 – Responding to DERs

Attn: Rachel Anderson

VECC requests that all correspondence and documentation also be electronically copied to:

Bill Harper (project consultant)
107 Baker Ave
Richmond Hill, Ontario
L4C 1X5
bharper.consultant@bell.net

To mitigate costs VECC requests only electronic copies of the materials. VECC may request paper copies of some or all of the materials should this become necessary. VECC requests electronic copies of the application and any additional supporting materials are sent to Mr. Lawford, Mr. Harper and Mr. Garner at their respective e-mail addresses.

GROUNDINGS FOR THE INTERVENTION

VECC has been active in the protecting the interest of low income consumers for over 15 years. We have appeared to the Board in numerous applications by natural gas and electricity distributors, electricity transmitters and power producers. As such we have developed a wide gamut of experience and information about distribution. VECC seeks to participate in this policy proceeding in order to provide the Board with the benefit of that experience and to protect the interest of energy consumers, especially those suffering from fuel poverty.

INTERESTS OF THE INTEVENOR

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. VECC has been granted participation status in similar Board policy proceedings.

INTENTION TO SEEK COST AWARDS

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).

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.

The Board has requested that costs for expert submissions should be identified. At this time and because VECC does not fully understand the nature, scope or opportunity of these policy initiatives no separate expert costs are being identified. As the proceedings progress VECC would intend to work with Board staff and other intervenors to find the most efficient and cost effective way of accessing any required additional resources.

DATED AT TORONTO, MARCH 22, 2019