



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

April 30, 2019

VIA E-MAIL

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
Toronto, ON  
M4P 1E4

Dear Ms. Walli:

**Re: EB-2019-0082 – Hydro One Networks Inc.'s 2020-2022 Transmission Custom IR  
Request for intervention and cost eligibility**

---

Please find attached the Notice of Intervention of VECC in the above-noted proceeding. We have also included our request to be eligible for an award of costs.

Yours truly,

John Lawford  
Counsel for VECC

Cc: HONI - Ms. Linda Gibbons - [Regulatory@HydroOne.com](mailto:Regulatory@HydroOne.com)

**ONTARIO ENERGY BOARD**

**An application by Hydro One Networks Inc. (HONI)  
for an order or orders made pursuant to section 78 of the Ontario Energy Board Act  
approving rates for the transmission of electricity for the period 2020-2022**

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

To: Ms. Kirsten Walli, Board Secretary

And to: **Ms. Linda Gibbons, Senior Regulatory Coordinator, HONI**

**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:  
[http://ontarioenergyboard.ca/oeb\\_Documents/Intervenor\\_Filings/VECC\\_2014\\_annual\\_intervenor\\_filing20140605.pdf](http://ontarioenergyboard.ca/oeb_Documents/Intervenor_Filings/VECC_2014_annual_intervenor_filing20140605.pdf)

**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)  
2-285 McLeod Street,  
Ottawa, ON  
K2P 1A1  
[jlawford@piac.ca](mailto:jlawford@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 consultants:

Mark Garner (project manager)  
647 Broadway Ave.  
Toronto, Ontario  
M4G 2S8  
647-408-4501 (office)  
[markgarner@rogers.com](mailto:markgarner@rogers.com)

and

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

9. To mitigate costs VECC requests only electronic copies of the materials. VECC may later 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. Harper and Mr. Garner at their respective e-mail addresses.

#### **GROUNDINGS FOR THE INTERVENTION**

10. VECC has been active in 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 the issues affecting residential electricity consumers. VECC has been granted intervenor status in the Hydro One Network Inc.' (HONI) prior transmission revenue requirement application EB-2018-0130.

#### **INTERESTS OF THE INTEVENOR**

11. HONI is proposing to recover costs a net revenue requirement of \$1,623.3 million which is a significant increase over that recently approved by the Board in EB-2018-0130. This increase is largely driven by a significant growth in the capital expenditures of the Utility. While VECC intends to review all aspects of this application the proposed planned capital expenditures in this application should be subject to detailed scrutiny. VECC's interest are also in the evolved transmission performance scorecard proposed and the term of the custom incentive rate mechanism.

#### **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 APRIL 30, 2019**