



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

June 3, 2019

VIA E-MAIL

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

Dear Ms. Walli:

**Re: EB-2019-0049 Kitchener-Wilmot Hydro Inc. (KWHI) 2020 Cost of Service Rates
Request for Intervention and eligibility for cost awards**

Please find attached the Notice of Intervention of VECC in the above-noted proceeding. We have also directed a copy of same to the Applicant via email.

Yours truly,

Original signed

John Lawford
Counsel for VECC

Cc: Kitchener-Wilmot - Margaret Nanninga - mnanninga@kwhydro.ca

2-285 McLeod Street, Ottawa, ON K2P 1A1 Tel: 613-562-4002 Fax: 613-562-0007 piac@piac.ca www.piac.ca

John Lawford – Direct Telephone 613-447-8125 jlawford@piac.ca

ONTARIO ENERGY BOARD

KITCHENER-WILMOT HYDRO INC. (KWHI)

2020 RATES

NOTICE OF INTERVENTION

OF THE

VULNERABLE ENERGY CONSUMERS COALITION

To: Ms. Kirsten Walli, Board Secretary

And to: **Ms. Margaret Nanninga, Vice President Finance & CFO**

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 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

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
2-285 McLeod Street,
Ottawa, Ontario
K2P 1A1
613-562-4002
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

and

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

9. 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 its representatives at their respective e-mail addresses.

GROUND FOR THE INTERVENTION

10. KWHI is seeking an increase in its base revenue requirement of over 18% as compared to the last Board approved in 2014. Proposed operating and maintenance costs to be included in rates are set to increase by over 20%. These increases are greater than inflation for the same period. KWHI is also forecasting a decline in kilowatt hours sold and notwithstanding an increase in the number of customers served. The Utility has also seen a large growth in rate base and is proposing, as part of this application, a number of large projects including replacement of its customer information system. With respect to rate design KWHI proposes to increase the revenue to cost ratio for the residential class. These and other matters are of interests to current and future electricity ratepayers in this franchise. Low income customers may be especially negatively impacted.

INTERESTS OF THE INTERVENOR

11. VECC is intervening in order to ensure that consumer interests and in particular the interests of the low-income and vulnerable users of electricity service are fully represented in the determination of just and reasonable rates. VECC intends to scrutinize all aspects of the Applicant's proposal.

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 3, 2019