



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

July 31, 2019

VIA E-MAIL

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street  
Toronto, ON  
M4P 1E4

Dear Ms. Walli:

**Re: Consultation to Review Natural Gas Supply Plans Ontario Energy Board: EB-2019-0137  
Request to Participate and eligibility for the awarding of costs for the 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.

Yours truly,

*John Lawford*

Counsel for VECC

Ms. Laurie Klein, Ontario Energy Board, [Laurie.Klein@oeb.ca](mailto:Laurie.Klein@oeb.ca)  
Enbridge Gas Distribution, Regulatory, [EGRegulatoryProceedings@enbridge.com](mailto:EGRegulatoryProceedings@enbridge.com)

**ONTARIO ENERGY BOARD**  
**Consultation to Review Natural Gas Supply Plans**  
**EB-2019-0137**  
**Request to Participate**  
**VULNERABLE ENERGY CONSUMERS COALITION**

To: Ms. Kirsten Walli, Board Secretary  
And to: **Enbridge Gas Distribution Regulatory**

**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. 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 Ext. 25  
[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)

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 the above parties at their respective e-mail addresses.

### **GROUND FOR THE INTERVENTION**

10. VECC has been a longstanding participant in matters with respect to both the electricity and natural gas distribution businesses carried out in Ontario. The amalgamation of the former Union Gas Limited with Enbridge Gas Distribution Inc. (Enbridge) will have an impact on the future cost of natural gas in Ontario. The amalgamation offers the possibility of benefits to Ontario consumers, especially low income consumers, who are facing every increasing energy costs.

### **INTERESTS OF THE INTEVENOR**

11. VECC is intervening in order to ensure that consumer interests and in particular the interests of the low-income and vulnerable users of natural gas are fully represented in the determination of just and reasonable rates, including gas supply costs. VECC will be seeking to understand what benefits may be provided by the recent amalgamation of the two largest gas distribution utilities in the Province. As such our interests are in all aspects of the proposed gas supply plan.

### **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, JULY 31, 2019**