



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

October 1, 2019

VIA E-MAIL

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

Dear Ms. Walli:

**Re: Corporation of the Town of Marathon EB-2018-0329
Leave to Construct 116.5 kilometres of natural gas pipelines in the Town of Marathon,
the Municipality of Wawa and the Townships of Schreiber and Terrace Bay.
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 the same to the Applicant.

Yours truly,

Original signed

John Lawford
Counsel for VECC

Email copy: clerk@marathon.ca

Daryl Skworchinski, Chief Administrative Officer and Clerk, Corporation of the Town of Marathon

ONTARIO ENERGY BOARD

**Corporation of the Town of Marathon
Leave to Construct 116.5 kilometres of natural gas pipelines in the Town of Marathon, the
Municipality of Wawa and the Townships of Schreiber and Terrace Bay**

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

To: Ms. Kirsten Walli, Board Secretary

And to: **Daryl Skworchinski, Town of Marathon**

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

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

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.

GROUNDINGS FOR THE INTERVENTION

10. The Corporation of the Town of Marathon (“Marathon”) is seeking to build and operate a greenfield natural gas distribution system to serve a number of communities along the Lake Superior north shore (the “North Shore Communities”). The proposal is unique in that the Applicant is seeking to supply gas through a LNG facility or facilities. In a letter of January 6, 2019 Enbridge Gas provided notice of its interest in providing natural gas service to the North Shore Communities. No process for the designation of the franchise has been announced by the Ontario Energy Board.

INTERESTS OF THE INTERVENOR

11. VECC is intervening in order to ensure that the interests of both existing and new natural gas consumer, particularly low-income, consumers of natural gas are fully represented in the delivery of natural gas and the determination of just and reasonable rates for that service. This Application will have impacts beyond the service of natural gas as it may also establish the means and regulatory rules under which proponents accessing the recently announced Natural Gas Expansion Support Program may establish greenfield natural gas service. VECC intends to scrutinize all aspects of the Applicant’s proposal and, if it should arise, the competitive response of other proponents including Enbridge Gas.

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, OCTOBER 1, 2019