



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

November 6, 2019

VIA E-MAIL

Christine E. Long
Registrar and Board Secretary
Ontario Energy Board
2300 Yonge Street
Toronto, ON
M4P 1E4

Dear Ms. Long:

**Re: EB-2019-0194 – Enbridge Gas Inc. (EGI) 2020 Rates and ICM
Request for Intervention and eligibility for cost awards**

Please find attached the Notice of Intervention and request for cost eligibility 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

Cc: EGI - Mark Kitchen - mark.kitchen@enbridge.com
EGIRegulatoryProceedings@enbridge.com

ONTARIO ENERGY BOARD

**EB-2019-0194 Enbridge Gas Inc. (EGI)
2020 Rates and Incremental Capital Module**

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

To: Ms Christine E. Long, Board Secretary and Registrar
And to: **Mark Kitchen, Director Regulatory Affairs, EGI**

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 Ext. 25
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.

GROUND FOR THE INTERVENTION

The Application is the 2nd under the Board approved 5 year IRM rate setting mechanism for EGI. VECC has previously been granted intervenor status and cost eligibility in the Utility's prior application EB-2018-0305 and in the associated MAADs decision EB-2017-0306/0307 which established the rate setting framework. This application also includes proposed incremental capital funding under the Board's ICM framework. As such the application will provide the basis for future consideration of incremental capital needs for the newly combined gas Utility. VECC is intervening in order to ensure that the residential consumer's interests, and in particular the interests of the low-income and vulnerable users of natural gas service, are fully represented in the determination of just and reasonable rates.

INTERESTS OF THE INTERVENOR

10. VECC has an interest both the rate setting and ICM proposals. While the rate setting proposal is largely mechanistic it does include matters which should be subject to scrutiny, including the PDO rate adjustment and the capital pass-through adjustments. VECC is particularly interested in an examination of the ICM proposals and in light of the Board's recent decision EB-2018-0305 on similar types of proposals. We also note that EGI has filed as part of this application an extensive addendum to its Asset Management Plan. This Plan may have material impact on both the proposed ICMs and future proposals for incremental capital funding. VECC has a long history before the Board both in the natural gas and electricity distribution sector on examining and testing such proposals in the interest of residential consumers.

INTENTION TO SEEK COST AWARDS

11. 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).
12. 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, NOVEMBER 6, 2019