



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

June 2, 2020

VIA E-MAIL

Christine E. Long
Registrar and Board Secretary
Ontario Energy Board
Toronto, ON

Dear Ms. Long:

**Re: Enbridge Gas Inc.
Ontario Energy Board File: EB-2020-0094
Harmonized System Expansion Surcharge, Temporary Connection Surcharge and
Hourly Allocation Factor
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,

John Lawford

Counsel for VECC

Cc: EGI - Rakesh Torul - egiregulatoryproceedings@enbridge.com

ONTARIO ENERGY BOARD

**Enbridge Gas Inc. (EGI)
Harmonized System Expansion Surcharge,
Temporary Connection Surcharge and
Hourly Allocation Factor**

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

To: Ms. Christine E. Long, Board Secretary
And to: **Rakesh Torul, Technical Manager, Regulatory Applications, 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:
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:

500-27 Carlton Street
Toronto, ON
M5B 1L2

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 ask for paper copies of some or all of the materials if this becomes necessary at some future point. 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. VECC was an approved intervenor in the generic proceeding which established system expansion surcharges (EB-2016-004). We were also a party in the subsequent initial applications of the system expansion surcharge policy by Union Gas (EB-2015-0179) and Enbridge Gas Distribution Inc. (EB-2017-0147). VECC has also been approved as an intervenor in the most recent rate applications of the new combined utility, Enbridge Gas Inc. (EB-2019-0194). VECC is a leading representative of low income energy consumers and the policies which may apply to allow natural gas access are of interest to low income consumers looking to reduce their energy costs.

INTERESTS OF THE INTERVENOR

11. This application seeks to harmonize both the system expansion surcharge (SES) and the Temporary Connection Surcharge (TCS) of the former utilities. Enbridge also seeks to modify its economic feasibility policies which underpin the eligibility for access to system expansion programs. These are matters which are of importance to low income consumers trying to access natural gas service. The Utility proposes to introduce an Hourly Allocation Factor, which VECC seeks to better understand both its purpose and the mechanics of its application.
12. VECC intends to scrutinize all aspects of the Applicant's proposal.

INTENTION TO SEEK COST AWARDS

13. 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).
14. 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 2, 2020