



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

July 24, 2020

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-2020-0095 - Enbridge Gas Inc. 2021 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 the same to the Applicant.

Enbridge Gas Inc. (EGI) has also requested in its covering letter of June 30, 2020 that the Board bifurcate the proceeding to address the rate setting mechanism (IRM) separately from the incremental capital module (ICM) issues. VECC has no objection to this proposal. However, we note that this evidence has not been filed and therefore our specific interest in this portion of the Application cannot as yet be known.

Yours truly,



John Lawford
Counsel for VECC

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

ONTARIO ENERGY BOARD

Enbridge Gas Inc (EGI)
2021 Distribution Rates
EB-2020-0095

NOTICE OF INTERVENTION
OF THE
VULNERABLE ENERGY CONSUMERS COALITION

To: Ms. Christine E. Long, Board Secretary
And to: Mr. 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 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.

GROUNDINGS AND INTERESTS IN INTERVENING

10. The Application is the 3rd 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 includes both adjustments to rates under

the approved incentive rate setting mechanism (IRM) and incremental capital funding (ICM). 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. VECC has been an approved intervenor in a number of proceedings involving EGI (EB-2018-0305/2019 Rates and EB-2019-0194/2020 Rates).

11. VECC has an interest both the rate setting and any 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 prior decisions on other ICM proposals of EGI.

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 24, 2020