



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

October 21, 2020

VIA E-MAIL

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

Dear Ms. Long:

**Re: Enbridge Gas Inc. (EGI) EB-2020-0134  
Application for 2019 Earnings Sharing and Disposition of Deferral & Variance Account  
Balances Request for Intervention and eligibility for cost awards**

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The Board issued Procedural Order No.1 on October 21, 2020 with respect to the above noted application. In reviewing the Order it has come to our attention that VECC, through oversight, did not intervene as it has typically done so for the applications arising out of the current rate plan of the Utility.

We are therefore seeking late intervenor status and cost eligibility in this proceeding. As the procedural order has only been issued no accommodations are necessary and VECC is not seeking any changes to the current schedule.

We apologize to for any inconvenience this late request has caused.

Yours truly,

J. Lawford,

VECC/PIAC

Email copy:

Anton Kacicnik, Manager Rates, Regulatory Affairs

[EGIRegulatoryProceedings@enbridge.com](mailto:EGIRegulatoryProceedings@enbridge.com)

David Stevens, Air and Berlis LLP

[dstevens@airdberlis.com](mailto:dstevens@airdberlis.com)

2-285 McLeod Street, Ottawa, ON K2P 1A1 Tel: 613-562-4002 Fax: 613-562-0007 [piac@piac.ca](mailto:piac@piac.ca) [www.piac.ca](http://www.piac.ca) John Lawford – Direct Telephone 613-447-8125 [jlawford@piac.ca](mailto:jlawford@piac.ca)

**ONTARIO ENERGY BOARD**

**Enbridge Gas Inc. (EGI)**  
**EB-2020-0134**  
**Application for 2019 Earnings Sharing**  
**and**  
**Disposition of Deferral & Variance Account**

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

To: Ms. Christine E. Long, Board Secretary  
And to: **Anton Kacicnik, Manager Rates, 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 (FTMA)
  - (b) The Ontario Coalition of Senior Citizens' Organizations (OCSCO)
  
2. The Federation of the Metro Tenants Association (the "FTMA") 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](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  
[lawford@piac.ca](mailto:lawford@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 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 AND INTERESTS IN INTERVENING**

10. VECC has been active in the protecting the interest of low-income consumers for over 15 years. We have also been an active intervenor in a number of prior rate and facilities proceedings of the Applicant and its predecessors. This application proposes the clearance of certain deferral accounts established in proceedings of which VECC was a participant.

## **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, OCTOBER 21, 2020**