



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

November 10, 2020

VIA E-MAIL

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

Dear Ms. Long:

**Re: EB-2020-0181 Enbridge Gas Inc. ("Enbridge Gas")**

**2021 Rates – Application and Evidence (Incremental Capital Module) Balances  
Vulnerable Energy Consumers Coalition (VECC) Request for Intervention and eligibility  
for cost awards**

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Please find attached the Notice of Intervention of Vulnerable Energy Consumers Coalition (VECC) with respect to the above-noted proceeding. We have also directed a copy of the same to the Applicant as well as their Counsel via email.

Yours truly,



John Lawford  
Counsel for VECC

Cc: EGI - Mark Kitchen - [EGIRegulatoryProceedings@enbridge.com](mailto:EGIRegulatoryProceedings@enbridge.com)  
Counsel - David Stevens - [dstevens@airdberlis.com](mailto:dstevens@airdberlis.com)

ONTARIO ENERGY BOARD

Enbridge Gas Inc. (EGI)  
EB-2020-0181  
2021 Rates – Application for  
Incremental Capital Funding

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](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. 125  
[jlawford@piac.ca](mailto:jlawford@piac.ca)  
PIAC Office: 613-562-4002 (Donna Brady) Ext. 121

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 predecessor companies. This application seeks incremental funding of \$165.8 million in support of new capital projects. This proposal is notwithstanding the deferral of rate rebasing sought by the Applicant as part of the approved merger of Union Gas Limited with Enbridge Gas Distribution. VECC seeks to examine all aspects of the application to test whether they meet the Board's previously articulated policies with respect to incremental capital spending during a rate deferral period and whether in any event the requirement of ratepayers to fund such projects is in the public interest.
11. VECC also notes that it has previously been granted intervenor status and cost eligibility in EGI's first ICM related application EB-2018-0305.

## **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). The Board has found the VECC to be eligible for cost awards in numerous natural gas and electricity proceedings before the Board, including the first phase proceeding, EB-2020-0095 for setting 2021 rates for EGI.
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, NOVEMBER 10, 2020**