



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

December 1, 2020

VIA E-MAIL

Ms. Christine Long
Registrar and Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th floor
P.O. Box 2319
Toronto, ON M4P 1E4

Dear Ms. Long:

**Re: EB-2020-0007 – Burlington Hydro Inc. 2021 Electricity Distribution Rates
Notice of Intervention of Vulnerable Energy Consumers Coalition (VECC)**

Please find enclosed 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

c/o John Lawford

Copy to: Sally Blackwell, Vice President, Regulatory Compliance & Asset Management
Burlington Hydro Inc.

**ONTARIO ENERGY BOARD
IN THE MATTER OF AN APPLICATION BY
BURLINGTON HYDRO INC.**

2021 ELECTRICITY DISTRIBUTION RATES

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

To: Ms. Christine Long, Registrar and Board Secretary

And to: Sally Blackwell, Vice President, Regulatory Compliance & Asset Management

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.

(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
Public Interest Advocacy Centre (PIAC)
2-285 McLeod Street,
Ottawa, Ontario
K2P 1A1
613- 562-4002 ext. 25
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 consultant:

Shelley Grice (project manager)
46 Scarborough Road
Toronto, Ontario
M4E 3M5
647-880-9942 (office)
shelley.grice@rogers.com

and

Bill Harper
107 Baker Ave
Richmond Hill, Ontario
L4C 1X5
bharper.consultant@bell.net

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 Mr. Lawford, Ms. Grice and Mr. Harper at their respective e-mail addresses.

GROUNDNS FOR THE INTERVENTION

10. Burlington Hydro Inc. seeks approval of a 2021 Test Year Distribution Revenue Requirement of \$35,529,884. This represents a revenue deficiency of \$3,903,311 for the 2021 Test Year.¹ The bill impact on low-income customers using 750 kWh per month is 10%.²

VECC seeks to review the key drivers of the rate increase including the proposed increase in Operating, Maintenance and Administration expenses and in-service capital additions. In addition, VECC seeks to review Burlington Hydro Inc.'s Advanced Capital Module (ACM) request for a new Enterprise Resource Planning (ERP) system. VECC will also review Burlington Hydro Inc.'s goals, Business Plan, load forecast, cost allocation and rate design, deferral and variance account balances, asset management objectives, asset condition, customer preferences and expectations, reliability trends, and COVID-19 impacts associated with this application.

INTERESTS OF THE INTEVENOR

11. VECC is intervening in order to ensure that the interests of electricity consumer, particularly low-income consumers, are fully represented in the delivery of electricity and the determination of just and reasonable rates for that service. VECC intends to scrutinize all key aspects of the Applicant's proposal.

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, DECEMBER 01, 2020

¹ Exhibit 6 P4

² Exhibit 1 P55