



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

February 5, 2021

VIA E-MAIL

Christine E. Long  
Registrar  
2300 Yonge Street  
Ontario Energy Board  
Toronto, ON  
M4P 1E4

Dear Ms. Long:

**Re: EB-2020-0020 - Espanola Regional Hydro Distribution Corporation (ERHDC)  
2021 Rates  
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) in 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: ERHDC - Tyler Kasubeck - [tyler.kasubeck@ssmpuc.com](mailto:tyler.kasubeck@ssmpuc.com)  
Counsel - John A.D. Vellone - [jvellone@blg.com](mailto:jvellone@blg.com)

**ONTARIO ENERGY BOARD**

**Espanola Regional Hydro Distribution Corporation  
(ERHDC)  
2021 Rates Cost of Service Application**

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

To: Christine E. Long, Registrar  
And to: Mr. Tyler Kasubeck, Rates and Regulatory Affairs Officer

**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  
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)

and

Bill Harper  
107 Baker Ave  
Richmond Hill, Ontario  
L4C 1X5  
[bharper.consultant@bell.net](mailto:bharper.consultant@bell.net)

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 be sent to its representatives at their respective e-mail addresses.

#### **GROUND FOR THE INTERVENTION**

10. The interest of VECC is to keep electricity distribution rates at or below the rate of consumer inflation. ERHDC has not had a cost-of-service review of its rates since 2012. The Applicant is seeking to recover a revenue requirement for 2021 that is more than 27% higher than last Board approved. This includes a 21% increase in operating costs as compared to the last approved cost of service amount. ERHDC is also seeking approval to incorporate into rates the cost of a rate base which is over 75% larger than previously reviewed by the Board. These and other increases will result, if approved, in distribution bill increases in the order of a 62% for some residential customers.

#### **INTERESTS OF THE INTERVENOR**

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 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.

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