



PUBLIC INTEREST ADVOCACY CENTRE
LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC

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July 23, 2008

VIA MAIL AND EMAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
26th Floor
2300 Yonge Street
Toronto, ON
M4P 1E4

Dear Ms. Walli:

Re: Consultation on Energy Issues Relating to Low Income Consumers
Board File No.: EB-2008-0150
Participation of the Vulnerable Energy Consumers Coalition (VECC)

Request for Intervenor Status

As Counsel to the Vulnerable Energy Consumer's Coalition (VECC), I am writing, per the Board letter of July 8th to indicate VECC's intent to participate in the EB-2008-0150. consultation process and request funding for my client's participation.

Interests Represented

VECC is a coalition of groups that represents the interests of those energy consumers who, because of their household income, or other distinguishing characteristic such as age, literacy, etc, have a set of concerns that may differ in kind, and, in magnitude, from those of more affluent residential consumers as well as commercial and industrial consumers. The Vulnerable Energy Consumers Coalition (VECC) is currently comprised of the Ontario Coalition of

Senior Citizens Organizations (OCSCO), and the Federation of Metro Tenants Association (FTMA).

OCSCO is itself a coalition of over 120 senior groups, as well as individual members, across Ontario. OCSCO represents the concerns of over 500,000 senior citizens through its group and individual memberships. OCSCO's objective is to improve the quality of life for Ontario Seniors.

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.

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 advice to the VECC participation.

Importance of the Consultation on Energy Issues Relating to Low Income Consumers to VECC

VECC's constituents' general concerns are that energy related costs should be kept as low as possible consistent with maintaining acceptable reliability and quality of service, with a specific focus on the cost and manner of energy related service to vulnerable consumers. VECC's mandate in advocating the interests of vulnerable consumers includes and has included advocating on behalf of low income consumers in the context of a variety of Board Proceedings, including but not limited to distribution rate applications, transmission rate applications, and generation rate applications (OPG), with respect to both natural gas and electric utilities across the province. Of particular relevance to this consultative is VECC's involvement in issues relating to

- a) targeted low income conservation and demand programs, both directly in OEB proceedings and through involvement outside Board proceedings, including participation in OPA sponsored consultations, and
- b) past and current OEB proceedings related but not limited to billing plans, arrears management, and security deposits, commodity risk management, and specifically VECC's participation in the ongoing "Electricity Distributors: Customer Service, Rate Classification and Non-Payment Risk" policy development initiative (EB-2007-0722)".

Accordingly VECC is particularly and specifically interested in participating in the low income consumer consultative as part of its ongoing and extensive participation in Board proceedings and policy development as they relate to low income and fixed income consumers.

Access to Other Sources of Funding

As noted in PIAC's letter of July 14, 2004 on the matter of Stakeholder Participation in the Board's regulatory policy development processes, there are two types of customer and public interest organizations:

- Those that are member sponsored and can allocate a limited amount of staff resources paid out of membership fees to respond to the economic or political interests of their members and
- Public interest groups that are not generally member funded or do not have funds available for tribunal interventions,

VECC is in the latter category and uses the Public Interest Advocacy Centre to provide and co-ordinate the representation of its interests. VECC's constituent organizations, which consist of over one half million members, belong primarily to seniors and tenant groups. In order to provide meaningful and informed comment on the issues on which the Board is seeking input, VECC must either ask its counsel, consultants and advisors to undertake pro bono work or not participate at all, unless cost recovery is available through the Board's cost award process.

VECC will, where possible, seek to coordinate its participation with others holding similar views on the issues and avoid any unnecessary duplication of effort.

Contact Information

The name and address of the agent authorized to receive documents on behalf of VECC is:

Mr. Michael Buonaguro
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c/o Public Interest Advocacy Centre
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VECC would request that all correspondence and documentation also be copied to VECC's consultant:

Mr. Roger Higgin
Econalysis Consulting Services
34 King Street East, Suite 1102
Toronto, Ontario

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I look forward to a favorable response to this request.

Thank you.

Yours truly,



Michael Buonaguro
Counsel for VECC