



PUBLIC INTEREST ADVOCACY CENTRE
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September 9, 2021

VIA E-MAIL

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

Dear Ms. Long:

**Re: EB-2021-0110 – Hydro One Networks Inc. (HONI) Custom IR Application (2023-2027)
for Transmission and Distribution Services
Request for Intervention and eligibility for cost awards**

Please find attached 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

Cc: HONI - Eryn Mackinnon, Regulatory@HydroOne.com

ONTARIO ENERGY BOARD

**Hydro One Networks Inc. (HONI)
Custom IR Application (2023-2027)
for Transmission and Distribution Services**

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

To: Ms. Christine E. Long, Board Secretary
And to: Ms. Eryn Mackinnon, Senior Regulatory Coordinator, HONI

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

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

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 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.

GROUNDINGS FOR THE INTERVENTION

10. Hydro One Networks is filing its first combined distribution and transmission application. It includes comprehensive system plans in support of its capital needs, including a TSP, DSP, SPF (System Plan Framework) and GSP (General Plant System Plan). The Custom Incentive Rate-setting methodologies proposed in the Application will, if approved, provide the basis for setting both distribution rates and revenue requirements for transmission services for the next five years. While the near-term rate impacts appear small the Applicant's proposal will have long-term consequences on the costs and services provided to Ontario ratepayers. The Application will determine the allocation of costs as between distribution and transmission customers. The proposed changes will impact low-voltage costs and other services provided by Hydro One distribution to a number of other Ontario distribution utilities. These and other proposals in the Application will impact the cost of electricity for all low-income ratepayers in Ontario. Hydro One is also proposing changes to the distribution rates of a number acquired utilities.
11. VECC has been granted intervenor status and cost eligibility in past distribution rate and revenue requirement applications of Hydro One.

INTERESTS OF THE INTERVENOR

12. VECC is intervening in order to ensure that the interests of electricity consumer, particularly low-income consumers, are fully represented in the transmission and 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

13. 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).
14. 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 OTTAWA, SEPTEMBER 9, 2021