



PUBLIC INTEREST ADVOCACY CENTRE  
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November 5, 2021

VIA E-MAIL

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

Dear Ms. Long:

**Re: EB-2021-0209 – Enbridge Gas Inc. 2022 Federal Carbon Pricing Program Application  
Vulnerable Energy Consumers Coalition (VECC) Request for intervention and  
cost eligibility**

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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 included VECC request to be eligible for an award of costs.

Yours truly,

John Lawford

Counsel for VECC

Cc: EGI – Richard Wathy - [Richard.Wathy@enbridge.com](mailto:Richard.Wathy@enbridge.com)  
[egiregulatoryproceedings@enbridge.com](mailto:egiregulatoryproceedings@enbridge.com)  
Counsel - Tyson Dyck - [tdyck@torys.com](mailto:tdyck@torys.com)

ONTARIO ENERGY BOARD

**ENBRIDGE GAS INC. (EGI)**  
**2022 Federal Carbon Pricing Program Application**

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

To: Ms. Christine Long, Board Secretary and Registrar

And to: **Richard Wathy, Technical Manager, Regulatory Applications**

**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:  
<https://www.oeb.ca/industry/applications-oeb/intervenor-information/annual-filings-frequent-intervenors>

**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)  
One Nicholas Street, Suite 1204  
Ottawa, Ontario  
K1N 7B7  
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 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 and Mr. Garner at their respective e-mail addresses.

## **GROUNDS FOR THE INTERVENTION**

10. VECC has been active in protecting the interest of low-income consumers for over 15 years. We have appeared to the Board in numerous applications by natural gas and electricity distributors, electricity transmitters and power producers.

## **INTERESTS OF THE INTEVENOR**

11. VECC's interests are with respect to the reasonableness of the implementation of the 2022 Federal Carbon Pricing Program. Enbridge Gas has estimated the 2022 cost of compliance with the *Greenhouse Gas Pollution Pricing Act* (GGPPA) and *Greenhouse Gas Emissions Performance Standards Regulation* (EPS) Regulation to be approximately \$1.68 billion - \$1,039.50 million for the EGD rate zone and \$644.36 million for the Union rate zones. Enbridge has suggested that there are opportunities to reduce (Output-Based Pricing System) OBPS/EPS-volumes. As part of the Facility GHG Emissions Reduction project, Enbridge Gas states it will continue to identify and review opportunities that reduce emissions.
12. The implementation of this program will have a significant impact on the costs paid by all natural gas consumers in Ontario. The impact will be especially meaningful to low-income consumers like those represented by VECC. There appear to be means for the Applicant to reduce these costs to vulnerable consumers. VECC wishes to understand and pursue these opportunities.

## **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 NOVEMBER 5, 2021**