



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

November 15, 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-2021-0148 – Enbridge Gas Inc. (EGI) 2022 Rates
Phase 2 Incremental Capital Module
Vulnerable Energy Consumers Coalition (VECC) Request for intervention and
cost eligibility**

Please find attached the Notice of Intervention of Vulnerable Energy Consumers Coalition (VECC) in the above-noted proceeding. We have also included our request to be eligible for an award of costs.

Yours truly,

John Lawford

Counsel for VECC

Email:
Regulatory Affairs
EGIRegulatoryproceedings@enbridge.com

Mr. David Stevens, Aird & Berlis LLP, Counsel for the Applicant
dstevens@airdberlis.com

ONTARIO ENERGY BOARD

ENBRIDGE GAS INC. (EGI)
2022 RATES PHASE 2 INCREMENTAL CAPITAL MODULE
NOTICE OF INTERVENTION
OF THE
VULNERABLE ENERGY CONSUMERS COALITION

To: Ms. Christine Long, Board Secretary and Registrar

And to: **Regulatory Affairs, EGI**

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
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

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.

GROUNDINGS 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. VECC was granted intervenor status in the associated 2022 rates application EB-2021-0147.

INTERESTS OF THE INTEVENOR

11. VECC's interests are the appropriateness of the proposed capital programs within the EGI's Utility System Plan where we note for example the Applicant has filed an addendum to its Asset Management Plan in support of the ICM. We are also interested in the reasonableness of both the overall costs of the ICMs and the incremental funding from ratepayers for these projects. VECC is also interested in the allocation of any approved costs of the ICM.

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 NOVEMBER 15, 2021