



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

December 2, 2021

VIA E-MAIL

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

Dear Ms Long:

**Re: EB-2021-0292 – Smart Meter Entity/ Independent Electricity System Operator (IESO)
Third Party Access to De-Identified Consumption Data
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 a request for an award of costs.

We note that in their cover letter counsel for the IESO has suggested an abbreviated proceeding which would proceed directly to a settlement conference (on the presumption that a settlement conference is established) and prior to any discovery. While this an unusual request we have had the opportunity to meet with the Applicant on a number of occasions with regard to this application. This has allowed us to understand better the proposal and, we think, the Applicant to better understand our concerns.

As such we have no objections to the Applicant's proposed method of proceeding but suggest that if adopted any settlement conference might be scheduled so as to allow parties to make enquires at the conference and to have clarifications made during that process. This might mean a slightly longer conference process than is usual and not necessarily sequential in days.

Yours truly,

John Lawford

Counsel for VECC

Cc: IESO- Ms. Miriam Heinz - regulatoryaffairs@ieso.ca
Counsel - Patrick G. Duffy - pduffy@stikeman.com

ONTARIO ENERGY BOARD

**IESO-SMART METER ENTITY
ACCESS TO ELECTRICITY CONSUMPTION DATA
NOTICE OF INTERVENTION
OF THE
VULNERABLE ENERGY CONSUMERS COALITION**

To: Ms. Christine Long, Registrar

And to: Ms. Miriam Heinz, Regulatory Affairs, IESO

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)
2-285 McLeod
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

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. Harper 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 in Ontario for over 20 years. We have appeared to the Board in numerous applications by natural gas and electricity distributors, electricity transmitters and power producers. As such we have developed a wide gamut of experience and information about the issues affecting residential electricity consumers and especially those consumers who are challenged to meet ever rising energy cost. This proceeding arises from the Board's prior decision EB-2018-0316. In that decision the SME was directed file a revised application after further consultation. VECC was party subject to that additional consultation.

INTERESTS OF THE INTEVENOR

11. Our interests are the protection of the privacy of energy consumers, that they only pay just and reasonable prices for the energy they consume, and that any benefits from ancillary services, such as collected energy data, is shared equitably. We intend to participate in all aspects of the application.

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 DECEMBER 2, 2021