



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

April 6, 2022

VIA E-MAIL

Ms. Nancy Marconi
Registrar
Ontario Energy Board
Toronto, ON

Dear Ms. Marconi:

**Re: Framework for Review of Intervenor Processes and Cost Awards
EB-2022-0011**

We are in receipt of the letter of March 31, 2022 with respect to the Board's proceeding to review the intervenor processes and cost awards. The letter sets out the date of April 7, 2022 to request cost eligibility. VECC is requesting an award of costs 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 39) and its' Practice Direction on Cost Awards (Section 3.03). 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.

The Board's letter also requests that comments on the issues be provided by April 21, 2022. We would suggest that this is insufficient time for parties, and certainly VECC, to develop, draft and discuss with other interested parties such an important issue. We also note that objections to costs are due April 14. Presuming a given amount of time needed for deliberations on any submissions the outcome is parties will have to invest a given amount of resources to this endeavour without an understanding of the resources available to them prior to their submission.

We do not think it the Board's intent to undermine the ability of parties most directly affected by this proceeding to make effective representations and suggest the Board extend the date for submissions.

We would ask that myself and our consultant, Mark Garner, be added to the distribution list for this consultation and that related correspondence be provided at:

Mark Garner (project manager) 647-408-4501 (office) markgarner@rogers.com
John Lawford, Counsel for VECC (PIAC), 613-562-4002, ext. 125, lawford@piac.ca

Yours truly,

John Lawford
Counsel for VECC