



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

June 23, 2022

**VIA RESS**

Ms. Nancy Marconi  
Registrar  
Ontario Energy Board  
2300 Yonge Street  
Toronto, ON  
M4P 1E4

Dear Ms. Marconi:

**Re: EB-2022-0013 – Alectra Utilities Corporation (Alectra Utilities) an application for approval rates and charges for ICM funding in the PowerStream and Enersource Rate Zones (“RZs”) effective January 1, 2023.  
Notice of Intervention of Vulnerable Energy Consumers Coalition (VECC)**

Please find enclosed the Notice of Intervention of Vulnerable Energy Consumers Coalition (VECC) in the above-noted proceeding. VECC is also seeking cost eligibility in this proceeding. We have also directed VECC request to the Applicant via email.

We apologize for the late filing of this request.

Yours truly,

*John Lawford*

John Lawford  
Counsel for VECC

Cc: Alectra - Natalie Yeates - [natalie.yeates@alecrautilities.com](mailto:natalie.yeates@alecrautilities.com)

**ONTARIO ENERGY BOARD  
IN THE MATTER OF AN APPLICATION BY  
ALECTRA UTILITIES CORPORATION (ALECTRA)  
FOR INCREMENTAL  
CAPITAL MODULE (“ICM”) RELATED ADJUSTMENT TO 2023 ELECTRICITY DISTRIBUTION  
RATES AND CHARGES  
NOTICE OF INTERVENTION  
OF THE  
VULNERABLE ENERGY CONSUMERS COALITION**

To: Nancy Marconi, Registrar  
And to: Natalie Yeates, Director, Regulatory Affairs and Reporting

**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  
2-285 McLeod Street,  
Ottawa, Ontario  
K2P 1A1  
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 the above parties at their respective e-mail addresses.

#### **GROUND FOR THE INTERVENTION**

10. Alectra Utilities Corporation (Alectra) is filing an application for the adjustment of rates to accommodate incremental capital spending and in accordance with the Board's ICM policies. The application, if approved would have an impact on the distribution rates of Alectra Utilities customers, including low-income consumers of the Utility. As capital projects these costs will continue into the future.

### **INTERESTS OF THE INTEVENOR**

11. VECC is intervening in order to ensure that consumer interests and in particular the interests of the low-income and vulnerable users are fully represented in the determination of just and reasonable rates. VECC has been a previous intervenor in similar proposals of the Applicant including the ICM proceeding EB-2020-0002. VECC is interested in the efficacy of capital investments to be made by ratepayers during the rate deferral period of this Utility and in the question as to whether it is reasonable to incremental increase rates during this period.

### **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.

**JUNE 23, 2022**