



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

July 13, 2022

VIA E-MAIL

Ms. Nancy Marconi,
Registrar
Ontario Energy Board
Toronto, ON

Dear Ms. Marconi:

**Re: EB-2022-0028 – EPCOR Electricity Distribution Inc.
Application for rates effective on January 13 1, 2023
Notice of Intervention of Vulnerable Energy Consumers Coalition (VECC)**

Please find enclosed the Notice of Intervention of VECC in the above-noted proceeding. VECC is also seeking cost eligibility in this proceeding. We have directed of our request to the Applicant.

We apologize for the late filing of this request.

Yours truly,

John Lawford
Counsel for VECC

Email:

Tim Hesselink, Senior Manager, Regulatory Affairs, EPCOR Electricity Distribution Ontario Inc.
thesselink@epcor.com

Richard King, Osler, Hoskin & Harcourt LLP, Counsel to the Applicant
rking@osler.com

**ONTARIO ENERGY BOARD
IN THE MATTER OF AN APPLICATION BY
EPCOR ELECTRICITY DISTRIBUTION INC. (EPCOR DISTRIBUTION)
COST OF SERVICE APPLICATION FOR RATES EFFECTIVE JANUARY 1, 2023
NOTICE OF INTERVENTION
OF THE
VULNERABLE ENERGY CONSUMERS COALITION**

To: Ms. Nancy Marconi, Registrar
And to: Mr. Tim Hesselink, Senior Manager, Regulatory Affairs, EPCOR Electricity Distribution

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 (FTMA)
 - (b) The Ontario Coalition of Senior Citizens' Organizations (OCSCO)

2. The Federation of the Metro Tenants Association (the "FTMA") 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
lawford@piac.ca

PIAC Office: 613-562-4002 (Donna Brady) Ext. 21

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

and

Bill Harper
107 Baker Ave
Richmond Hill, Ontario
L4C 1X5
bharper.consultant@bell.net

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.

GROUNDS FOR THE INTERVENTION

10. This Utility has not had its rates rebased since 2013. Since the last rebasing a change in ownership has occurred. EPCOR Distribution is seeking to incorporate into rates both a large increase in the normal annual capital budget as well as operating and maintenance expenses that are over 50% higher than that last approved by the Board

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 is also interested in the efficacy of capital investments to be made by ratepayers during the rate deferral period of this Utility. We intend to scrutinize all aspects of the Applicant's proposal.

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 AT TORONTO, JULY 13, 2022