



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

October 7, 2022

VIA RESS

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

Dear Ms. Marconi:

**Re: EB-2022-0059–PUC Distribution Inc. (PUC)  
May 1, 2023 Cost of Service Distribution Rates  
Vulnerable Energy Consumers Coalition (VECC)  
Request for Intervention and eligibility for cost awards**

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Please find attached the Notice of Intervention of Vulnerable Energy Consumers Coalition (VECC) in the above-noted proceeding. We have also directed a copy of the same to the Applicant.

Yours truly,

*John Lawford*

Counsel for VECC

cc:: PUC - Tyler Kasubeck - [regulatory@ssmpuc.com](mailto:regulatory@ssmpuc.com)  
Counsel - John Vellone - [jvellone@blg.com](mailto:jvellone@blg.com)

**ONTARIO ENERGY BOARD**

**PUC DISTRIBUTION INC. (PUC)  
MAY 1, 2023 RATES APPLICATION  
NOTICE OF INTERVENTION  
OF THE  
VULNERABLE ENERGY CONSUMERS COALITION**

To: Ms. Nancy Marconi, Registrar  
And to: Mr. Tyler Kasubeck, Regulatory Financial Analyst, PUC

**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/stakeholder-engagement/intervenor-information/annual-filings-frequent-intervenors>

#### **INDIVIDUALS AUTHORIZED TO REPRESENT VECC IN THIS PROCEEDING**

7. The name and 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)  
and

Bill Harper  
107 Baker Ave  
Richmond Hill, Ontario  
L4C 1X5  
[bharper.consultant@bell.net](mailto:bharper.consultant@bell.net)

9. To mitigate costs VECC requests only electronic copies of the materials. VECC may ask for paper copies of some or all of the materials if this becomes necessary. VECC requests electronic copies of the application and any additional supporting materials are sent to its representatives at their respective e-mail addresses.

## **GROUNDS FOR THE INTERVENTION**

10. PUC Distribution Inc. is seeking to incorporate into rates operating and maintenance expenses that are over 17% higher than that last approved by the Board in 2018. The Applicant is also proposing a capital budget and distribution system plan which compared to past normal spending is significantly higher.
11. The application includes the proposal to include in rate base over \$20 million in smart grid investments which represents almost 20% of the distribution rate base for this small utility. As well as the capital investment the application includes forecast for revenues associated with this project in excess of \$1 million. The Utility also proposes a VVO (Voltage/VAR Optimization) deferral account related to the smart grid projects.
12. VECC was an approved intervenor in the prior cost of service application of PUC Distribution EB-2017-0071. VECC was also an approved intervenor in the ICM applications related to the smart grid project (EB-2018-0291 and EB-2020-0249)

## **INTERESTS OF THE INTERVENOR**

13. VECC is intervening in order to ensure that the interests of electricity consumer, particularly low-income consumers, are fully represented in the delivery of electricity and the determination of just and reasonable rates for that service. VECC intends to scrutinize all aspects of the Applicant's proposal in the interest of ensuring low-income ratepayers only pay in rates for the reasonable and prudent costs incurred by PUC Distribution Inc.

## **INTENTION TO SEEK COST AWARDS**

14. 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 39) and its' Practice Direction on Cost Awards (Section 3.03).
15. 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.

**\*\*\* OCTOBER 7, 2022\*\*\***