



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

December 2, 2022

VIA E-MAIL

Ms. Nancy Marconi
Registrar
Ontario Energy Board
Toronto, ON

Dear Ms. Marconi:

**Re: EB-2022-0200 Enbridge Gas Inc. (EGI)
2024 Cost of Service distribution, transmission and storage rates
Request for Intervention and eligibility for cost awards**

Please find attached the Notice of Intervention of 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

Email copy:

Vanessa Innis, Manager, Strategic Applications, EGI
EGISRegulatoryproceedings@enbridge.com

David Stevens, Aird & Berlis LLP, Counsel to EGI
dstevens@airdberlis.com

ONTARIO ENERGY BOARD

**ENBRIDGE GAS INC. (EGI)
JANUARY 1, 2024 RATE APPLICATION
NOTICE OF INTERVENTION
OF THE
VULNERABLE ENERGY CONSUMERS COALITION**

To: Ms. Nancy Marconi, Registrar
And to: Vanessa Innis, Manager, Strategic Applications, EGI

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/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
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

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.

GROUND'S FOR THE INTERVENTION

10. Enbridge Gas Inc. (EGI) is seeking to rebase its rate related costs and revise its cost allocation and rate design. This is the first application of the former utilities' Enbridge Gas Distribution Inc. and Union Gas Limited since their amalgamation into EGI. The amalgamated (and former utilities)

have not had rates rebased for nearly 10 years. The amalgamated Utility is now applying to rebase on a harmonized basis reducing the existing 42 rate classes to a total of 16.

11. The proposal also includes an incentive rate making mechanism.
12. The result of the proposal is significant distribution related rate impacts especially in the former Union North East franchise.

INTERESTS OF THE INTERVENOR

13. VECC has previously been approved as an intervenor in all of the Utility's (and its predecessors') rate related applications. The Board has approved party settlements in many of those proceedings where VECC was a party.
14. In addition to these specific interests VECC is intervening in order to ensure that the interests of natural gas consumer, particularly low-income consumers, are fully represented in the delivery of natural gas 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 the Applicant.

INTENTION TO SEEK COST AWARDS

15. 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).
16. 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 DECEMBER 2, 2022