

# Intervention Form

## Case Number:

EB-2023-0033

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## Intervenor Name:

Vulnerable Energy Consumers Coalition (VECC)

## Mandate and Objectives:

The Vulnerable Energy Consumers Coalition (VECC) is an unincorporated coalition of two major Ontario organizations.

VECC was formed in 1999 with the intent of representing the interests of residential consumers in matters of energy regulation and policy where those consumers, by reason of age, income, tenure or place of residence, language, literacy, or other infirmity may experience greater hardship than other residential consumers as a result of increased rates or policies that place demands on customers. These same consumers may have difficulty, or lack the resources to ensure that their voice is heard by regulators and policy makers deciding upon energy issues.

VECC has intervened in hundreds of OEB hearings since the date of its formation in 1999, and shares in the credit for the efficacy of the intervenor participation process in affecting decisions that have advanced the public interest and resulted in reductions in utility demands and just and reasonable rates.

## Membership of the Intervenor and Constituency

## **Represented:**

The Vulnerable Energy Consumers Coalition (VECC) is an unincorporated coalition of two major Ontario organizations, the Ontario Society of Senior Citizens' Organizations and the Federation of Metro Tenants' Associations, facilitated by the assistance of a national non-profit corporation and registered charity, the Public Interest Advocacy Centre.

## **Programs or Activities Carried Out by the Intervenor:**

PIAC is not a member organization of the VECC coalition, but facilitates the work of VECC, largely by ensuring that representation and research support is available to VECC, and by assuming administrative responsibilities associated with filings and other Board requirements. Because PIAC is not a law firm, it cannot provide legal services. Legal services to VECC are provided by counsel who are not employees/agents for PIAC, but recommended by PIAC for VECC retainer as a result of their regulatory experience with energy issues and regulation.

## **Governance Structure:**

VECC representation is mainly provided by counsel and consultants retained by VECC through the facilitation of PIAC. PIAC is only the facilitator and administrator in the arrangement. As well, in any VECC intervention, counsel instructions are the province of VECC, not PIAC.

VECC engages legal counsel and consultants to assist in its representation before the Board.

## **Representatives:**

Mark Garner  
[markgarner@rogers.com](mailto:markgarner@rogers.com)

Bill Harper  
[bharper.consultant@bell.net](mailto:bharper.consultant@bell.net)

## **Other Contacts:**

## **Frequent Intervenor Form:**

## **OEB Proceedings:**

EB-2021-0004 EB-2021-0009 EB-2021-0011 EB-2021-0027 EB-2021-0039 EB-2021-0041  
EB-2021-0052 EB-2021-0110 EB-2021-0147 EB-2021-0148 EB-2021-0149 EB-2021-0181  
EB-2021-0212 EB-2021-0243 EB-2022-0013 EB-2022-0016 EB-2022-0018 EB-2022-0019  
EB-2022-0022 EB-2022-0024 EB-2022-0028 EB-2022-0043 EB-2022-0044 EB-2022-0049  
EB-2022-0053 EB-2022-0056 EB-2022-0067 EB-2022-0072 EB-2022-0096 EB-2022-0133  
EB-2022-0184 EB-2022-0200 EB-2023-0106 EB-2023-0109

## **Issues:**

InnPower is seeking a significant an increase in capital spending in the bridge and test years. It is also proposing a significantly more distribution system plan (DSP) over the term of proposed rate plan than the previous DSP. We also note that the Board had directed InnPower in the prior cost of service proceeding EB-2016-0085 to review its capital additions and revise the Distribution System Plan to align with expectations arising from the implementation of a new business plan. VECC was a party to that proceeding. The Utility is also proposing to recover in distribution rates an increase in operating costs of over 55% as compared to the prior Board approved amount for the 2017 test year. We also note that InnPower's total cost per customer is significantly higher than the provincial average. VECC is interested in these and all the other components of setting new cost of service rates including cost allocation and rate design issues.

## **Policy Interests:**

N/A

## **Hearings:**

VECC's intention is to make submissions with respect to the form of hearing at a later date and as appropriate to the circumstances and procedural direction of the Board

## **Evidence:**

VECC does not anticipate filing evidence in this proceeding.

## **Coordination with Other Intervenors:**

VECC endeavors to work cooperatively with all intervenors and where appropriate to coordinate its activities.

## **Cost Awards:**

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).

VECC members do not have access to the direct funding required to retain appropriate legal consulting support for its intervention in the 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.

## **Language Preference:**

VECC intends to participate in English.