



PUBLIC INTEREST ADVOCACY CENTRE
LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC

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September 9, 2008

VIA FAX and E-MAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
27th Floor
2300 Yonge Street
Toronto, ON
M4P 1E4

Dear Ms. Walli:

Re: Board File No. EB-2008-0280
Guidelines for the Pre-Approval of Long-Term Gas Supply and/or
Upstream Transportation Contracts ("LTC Guidelines")

Request to Participate and Request for Cost Eligibility Determination
by the Vulnerable Energy Consumers' Coalition

As Counsel to the Vulnerable Energy Consumers' Coalition (VECC), in response to the Board's letter dated August 22, 2008, I hereby advise you that VECC wishes to participate in Phase I of this process. I apologize for submitting this request late, it was purely through inadvertence; I ask for the Board's indulgence in allowing late filing of the participation request.

Interests Represented

VECC is a coalition of groups that represents the interests of those energy consumers who, because of their household income, or other distinguishing characteristic such as age, literacy, etc, have a set of concerns that may differ in kind, and, in magnitude, from those of more affluent residential consumers as well as commercial and industrial consumers. The Vulnerable Energy Consumers Coalition (VECC) is currently comprised of the Ontario Coalition of Senior Citizens (OCSCO), and the Federation of Metro Tenants Association.

OCSCO is itself a coalition of over 120 senior groups, as well as individual members, across Ontario. OCSCO represents the concerns of over 500,000

senior citizens through its group and individual memberships. OCSCO's objective is to improve the quality of life for Ontario Seniors.

The Federation of the Metro Tenants Association 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.

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 advice to the VECC intervention.

Issues of Specific Concern to VECC

As the Board is well aware, there is seldom a bright line that separates the interests of stakeholders on all issues within the regulatory purview of the OEB. From time to time, depending on the issue, the interests of VECC are aligned with those of other ratepayer groups. As usual, VECC will coordinate its intervention with other intervenors to avoid duplication and overlap where possible.

VECC's main interest in participating in this process is that the development and implementation of the LTC Guidelines may result in greater risks borne by ratepayers with potential material cost consequences for low-volume general service customers.

Request for Cost Eligibility

VECC requests that the Board determine that VECC is eligible for a cost award based on section 3.03 (a) of the *Practice Direction on Cost Awards* given that VECC represents the interests of low- and fixed-income ratepayers. The Board has previously found VECC to be eligible for recovery of its legitimate costs in many natural gas and electricity proceedings.

VECC has no access to any other funding sources and relies upon the cost awards it receives to participate in proceedings before the Board.

I would appreciate all communications be directed to me:

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and our consultant:
Dr. James Wightman, Econalysis Consulting Services
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Yours truly,

Original signed

Michael Buonaguro
Counsel for VECC