



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

October 11, 2023

VIA E-MAIL

Ms. Nancy Marconi
Registrar
Ontario Energy Board
Toronto, ON

Dear Ms. Maroni:

**Re: Consultation on Policy for Standby Rates
Ontario Energy Board File No. EB-2023-0278
VECC's Cost Eligibility Request**

On September 28, 2023 the Ontario Energy Board issued a letter indicating that it was initiating a consultation to inform its approach to existing and future electricity distribution standby rates. VECC plans on participating. The topic is of direct interest to VECC's constituents as revenues generated by standby rates contribute to a distributor's overall revenue requirement and, thereby, impact the rates payable by residential customers. VECC will be represented by Bill Harper, one of its consultants.

VECC will be requesting an award of costs for its participation 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). VECC's members do not have access to the direct funding required to retain appropriate legal and consulting support for its participation 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. Additional details regarding VECC can be found in its 2023 information filing.

Yours truly,

John Lawford

Counsel for VECC