



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

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Michael Buonaguro  
Counsel for VECC  
(416) 767-1666

September 18, 2008

**VIA MAIL and E-MAIL**

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

Dear Ms. Walli:

**Re: Vulnerable Energy Consumers Coalition (VECC)**  
**Notice of Intervention: EB-2008-0222**  
**Canadian Niagara Power Inc. – Eastern Ontario Power – 2009 Electricity**  
**Distribution Rate Application**

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

Thank you.

Yours truly,

Michael Buonaguro  
Counsel for VECC

cc: Mr. Douglas Bradbury  
Canadian Niagara Power Inc. – Eastern Ontario Power

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Sch.B, as amended;**

**AND IN THE MATTER OF an Application by Canadian Niagara Power Inc. – Eastern Ontario Power pursuant to section 78 of the *Ontario Energy Board Act* for an Order or Orders approving just and reasonable rates for the delivery and distribution of electricity.**

**NOTICE OF INTERVENTION**

**OF**

**VULNERABLE ENERGY CONSUMERS COALITION (VECC)**

To: Ms. Kirsten Walli  
Board Secretary

And to: Canadian Niagara Power Inc. – Eastern Ontario Power  
Attn: Mr. Douglas Bradbury

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
  - (b) The Ontario Coalition of Senior Citizens' Organizations (OCSCO)

2. 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. 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 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 members. OCSCO's mission is to improve the quality of life for Ontario's seniors. OCSCO's address is:

660 Briar Hill Avenue, Suite 207  
Toronto, ON  
M6B 4B7

4. The name and address of the agent authorized to receive documents on behalf of VECC is:

Mr. Michael Buonaguro  
Counsel  
c/o Public Interest Advocacy Centre  
34 King Street East, Suite 1102  
Toronto, Ontario  
M5C 2X8  
(416) 767-1666 (office)  
(416) 348-0641 (fax)

mbuonaguro@piac.ca

5. VECC would request that all correspondence and documentation also be copied to VECC's consultant:

Mr. Bill Harper  
Econalysis Consulting Services  
34 King Street East, Suite 1102  
Toronto, Ontario  
M5C 2X8  
(416) 348--0193 (office)  
(416) 348-0641 (fax)  
bharper@econalysis.ca

6. VECC requests that copies of the Application and any additional supporting materials be forwarded to each of the two parties named above.
7. VECC is intervening in order to ensure that consumer interests and in particular the interests of the low-income and vulnerable users of electricity are fully represented in the determination of just and reasonable rates for 2009. Areas of the current Application of interest to VECC include; a) the proposed increase in revenues from distribution rates of over 30%; b) the load forecast methodology; c) the shared service arrangements with the Applicant's affiliates; d) the allocation of costs to customer classes and e) the proposed rate harmonization with Fort Erie.
8. VECC strongly supports the Board's proposal to include an "oral component" as part of the review process. In VECC's view the actual

form of this component (technical conference versus oral hearing) is best determined after the interrogatory phase of the process has been completed.

9. 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 41) and its Practice Direction on Cost Awards (Section 3.03).

DATED AT TORONTO, THIS 18<sup>th</sup> DAY OF SEPTEMBER 2008

Michael Buonaguro  
Counsel for VECC  
c/o Public Interest Advocacy Centre