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OCT 11 2007

Michael Buonaguro  
Counsel for VECC  
(416) 767-1666

October 10, 2007

ONTARIO ENERGY BOARD

VIA MAIL and E-

MAIL

*EK 10/10*  
Ms. Kirsten Walli  
Board Secretary  
P.O. Box 2319  
2300 Yonge St.  
Toronto, ON  
M4P 1E4

*EB-2007-0744*

| OEB BOARD SECRETARY |                    |
|---------------------|--------------------|
| File No:            | Sub File: <i>4</i> |
| Panel               | <i>PS, CS, BR</i>  |
| Licensing           | <i>SS</i>          |
| Other               |                    |
| 00/04               |                    |

Dear Ms. Walli

Re: **Vulnerable Energy Consumers Coalition (VECC)**  
**Notice of Intervention: EB-2007-0744**  
**Great Lakes Power Limited (GLPL) – 2007 Electricity Distribution**  
**Rate Application**

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

Thank you.

Yours truly,

Michael Buonaguro  
Counsel for VECC  
Encl.

cc: Great Lakes Power Limited

**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 Great Lakes Power Limited. (GLPL) 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: Great Lakes Power Limited  
Attention: Mr. Tim Lavoie

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:

500-3101 Bathurst Street  
Toronto, ON  
M6A 2A6

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) 767-2229 (fax)  
[mbuonaguro@piac.ca](mailto: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](mailto:bharper@econalysis.ca)

6. 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 2007.
7. VECC requests copies of the Application and any additional supporting materials be forwarded to each of the two parties named above.
8. VECC is of the view that issues raised in the Application should be the subject of an oral proceeding for the following reasons:
- This is the first time that GLPL's base distribution rates will be the subject of regulatory review since they were first established in 2002 for market opening.

- The overall deficiency in base distribution revenues (i.e., excluding any provision for RPPP) is significant – almost half the base distribution revenues.
  - This is the first proceeding in which the OEB will be dealing with the implementation of Electricity Act Regulations 445/07 and 446/07.
  - GLPL is proposing material changes to its customer classification.
9. VECC will be requesting an award of costs for its participation in this proceeding and believes that it meets the eligibility criteria set out in the Ontario Energy Board's Rules of Practice and Procedure and its Practice Direction on Cost Awards.

DATED AT TORONTO, THIS 10<sup>th</sup> DAY OF OCTOBER, 2007

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