



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

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October 7, 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)**  
**EB-2008-0225**  
**Centre Wellington Hydro Ltd. – 2009 Electricity Distribution Rate**  
**Application**

We are writing on behalf of our client, the Vulnerable Energy Consumers' Coalition (VECC), in reply to the letter dated September 29, 2008 and received by us on October 2, 2008 from Centre Wellington Hydro Ltd. ("CWHL") wherein the applicant appears to object to VECC's intervenor status in the above-captioned proceeding. The basis of CWHL's apparent objection appears to be its belief that VECC may not represent any specific person or organization in its service area. Accordingly CWHL seeks information confirming that VECC reports to organizations or persons within the CWHL franchise area and that those organizations or persons have directed VECC to intervene in this application on their behalf.

CWHL's request that our client confirm it represents persons or organizations within its service area would, if followed in every rate application for every public interest intervenor, be impractical and create needless expense. In VECC's case, one of VECC's members, OCSCO, for example, includes over 140 seniors' organizations and individuals representing well over 500,000 senior citizens from across Ontario. Other public interest organizations would have similar problems in matching members' residence with franchise area.

More importantly, while numbers and residence of organization members might

conceivably be important in circumstances where the Board considers issues such as compensation to, or treatment of, land owners for certain LDC projects and operations and where a group seeks to represent the interests of that constituency, it is unlikely to be relevant in the routine determination of issues of revenue requirement including cost allocation and rate design. With respect, the CWHL approach confuses the pertinent question of whether the application concerns the interests of the rate-paying constituency that VECC seeks to represent with the identification of individual ratepayers in the organizations making up the VECC coalition. VECC does not believe that CWHL would claim that its application will have no impact upon vulnerable consumers and/or that there are no such customers of CWHL within its franchise area.

In most Board proceedings, VECC advocates for the interests of low income and vulnerable energy consumers across Ontario without making inquiry into whether its member organizations have individual member customers within the relevant jurisdiction. If there were no vulnerable and/or low-income customers whose interests are affected by the CWHL application, then VECC would not, and should not, intervene. We believe that VECC's representation meets that criterion of relevance in this proceeding.

It should be noted that in many of the EDR applications before the Board for 2009 rates VECC is one of only a few, and we believe in some instances is the only intervenor of record. VECC respectfully submits that its comprehensive representation of vulnerable consumer interests across the various distributors in Ontario is helpful to the Board in terms of maintaining consistent regulatory oversight over all regulated distributors.

Unlike all of the applicants to the Board in the 2009 EDR applications, VECC has no funds of its own and no mechanism for recovering its costs directly from the ratepayer groups it represents. It therefore depends on cost awards to be able to provide critical, and meaningful, analysis to the evidence submitted by the applicants.

VECC submits that it has a well established history of responsible intervention that adds value to Board proceedings, as well as a history of efficiency with respect to the cost of its interventions.

Accordingly, VECC respectfully requests that VECC's intervenor status be confirmed along with its eligibility for a cost award in the proceeding.

Yours truly,



Michael Buonaguro  
Counsel for VECC