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**From:** Ontario Energy Board <webmaster@oeb.ca>  
**Sent:** Monday, November 25, 2024 2:29 PM  
**To:** Office of the Registrar <Registrar@oeb.ca>  
**Cc:** dbrady@piac.ca  
**Subject:** Intervention Form: EB-2024-0030 - Vulnerable Energy Consumers Coalition

# Intervention Form

## Case Number:

EB-2024-0030

## Intervenor Name:

Vulnerable Energy Consumers Coalition

## Mandate and Objectives:

The Vulnerable Energy Consumers Coalition (VECC) is an unincorporated coalition of two major Ontario organizations.

VECC was formed in 1999 with the intent of representing the interests of residential consumers in matters of energy regulation and policy where those consumers, by reason of age, income, tenure or place of residence, language, literacy, or other infirmity may experience greater hardship than other residential consumers as a result of increased rates or policies that place demands on customers. These same consumers may have difficulty, or lack the resources to ensure that their voice is heard by regulators and policy makers deciding upon energy issues.

VECC has intervened in hundreds of OEB hearings since the date of its formation in 1999, and shares in the credit for the efficacy of the intervenor participation process in affecting decisions that have advanced the public interest and resulted in reductions in utility demands and just and reasonable rates.

## Membership of the Intervenor and Constituency Represented:

The Vulnerable Energy Consumers Coalition (VECC) is an unincorporated coalition of two

major Ontario organizations, the Ontario Society of Senior Citizens' Organizations and the Federation of Metro Tenants' Associations, facilitated by the assistance of a national non-profit corporation and registered charity, the Public Interest Advocacy Centre.

## **Programs or Activities Carried Out by the Intervenor:**

PIAC is not a member organization of the VECC coalition, but facilitates the work of VECC, largely by ensuring that representation and research support is available to VECC, and by assuming administrative responsibilities associated with filings and other Board requirements. Because PIAC is not a law firm, it cannot provide legal services. Legal services to

VECC are provided by counsel who are not employees/agents for PIAC, but recommended by PIAC for VECC retainer as a result of their regulatory experience with energy issues and regulation.

## **Governance Structure:**

VECC representation is mainly provided by counsel and consultants retained by VECC through the facilitation of PIAC. PIAC is only the facilitator and administrator in the arrangement. As well, in any VECC intervention, counsel instructions are the province of VECC, not PIAC.

## **Representatives:**

Mark Garner  
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## **Other Contacts:**

## **Frequent Intervenor Form:**

### **OEB Proceedings:**

EB-2021-0039 EB-2021-0041 EB-2021-0052 EB-2021-0110 EB-2021-0147 EB-2021-0148  
EB-2021-0149 EB-2021-0181 EB-2021-0212 EB-2021-0243 EB-2022-0013 EB-2022-0016  
EB-2022-0018 EB-2022-0019 EB-2022-0022 EB-2022-0024 EB-2022-0028 EB-2022-0043  
EB-2022-0044 EB-2022-0049 EB-2022-0053 EB-2022-0056 EB-2022-0067 EB-2022-0072  
EB-2022-0096 EB-2022-0133 EB-2022-0184 EB-2022-0200 EB-2023-0106 EB-2023-0109  
EB-2023-0062 EB-2023-0125 EB-2023-0298 EB-2023-0188 EB-2024-0004

### **Issues:**

VECC's members are customers of the Applicant and will be materially affected. The Utility's last cost of service application, EB-2019-0041 was for a 2020 test year. VECC was granted party status in that proceeding. Hydro 2000 is now proposing a 2025 residential distribution rate increase of over 24% from currently approved rates. The Applicant is seeking greater than a 39% increase in operating costs as compared to the last Board approved amount. Notwithstanding the large residential rate increase Hydro 2000's capital investments over the next rate period are modest and appear lower on an average annual basis than in the previous distribution system plan.

VECC has an interest in all the issues included in the standard issues list for cost-based applications.

### **Policy Interests:**

N/A

### **Hearings:**

Until interrogatories and other discovery is complete, we believe it is premature to decide upon either a written or oral hearing. We do recommend the inclusion of a process to allow the parties to attempt to settle the issues and present any settlement to the Board.

### **Evidence:**

VECC does not anticipate filing evidence in this proceeding

### **Coordination with Other Intervenors:**

VECC will coordinate with other intervenors with similar interests, where appropriate, to promote responsible participation in the proceeding.

## **Cost Awards:**

VECC applies for recovery of its costs reasonably incurred in the course of its intervention in this matter. VECC's members are customers of the Applicant and eligible for an award of costs pursuant to section 3.03(a) of the Practice Direction. VECC has participated in many proceedings before the Board and has been found to be eligible for recovery of its reasonably incurred costs.

## **Language Preference:**

VECC intends to participate in English.