



PUBLIC INTEREST ADVOCACY CENTRE  
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January 29, 2025

OEB VIA – Email

Ms. Nancy Marconi  
Registrar  
Ontario Energy Board  
2300 Yonge Street  
Toronto, ON  
M4P 1E4

Dear Ms. Marconi:

**RE: Enbridge Gas Inc. (“EGI”)  
2026-2030 DSM Plan Application – Intervenor Status Request – VECC Reply  
EB-2024-0198**

We are counsel to Vulnerable Energy Consumers Coalition (“VECC”). This letter is in reply to Enbridge Gas Inc.’s letter dated January 21, 2025 wherein EGI made the following comments with respect to Low Income Energy Network (“LIEN”) and VECC:

*In reviewing the intervention requests by these parties, it appears that there is a significant degree of overlap in that each represents the interests of low-income ratepayers (whether as owners or as tenants or by reason of age or infirmity). While the interests represented by one group may be somewhat different (larger or smaller in terms of demographics and number of associations that are involved), the objectives of each are indistinguishable, namely, they seek to represent the interests of low-income vulnerable ratepayers.*

*As well, we note that as of this date, only one of these intervenors has engaged counsel, LIEN. If the interventions were combined, presumably the currently unrepresented party would benefit from the involvement of counsel who will ensure that there is no overlap in terms of interrogatories, cross examinations and in the argument filed.*

VECC has reviewed the letter prepared by LIEN dated January 28, 2025 and is in agreement with LIEN’s comments and the reasons why VECC and LIEN may coordinate activities but do not do joint interventions.

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VECC's representation in this proceeding is mainly provided by its consultant, retained by VECC through the facilitation of PIAC, in part to minimize costs. VECC **is not** an unrepresented party in this proceeding as EGI asserts. Should VECC's consultant require legal counsel as part of the process, VECC will engage its counsel for legal instructions. VECC anticipates this requirement in the preparation of the oral hearing and final submissions. VECC does not require nor has it retained or jointly-retained LIEN's counsel and agrees with LIEN. EGI's proposal ignores a potential conflict of interest where the interests of the two parties (i.e., LIEN and VECC) diverge from one another in significant ways due to the significant differing mandates of the two organizations.

VECC intends to act responsibly in its intervention and will make every effort to coordinate with LIEN where it is appropriate in order to minimize duplication.

Yours truly,

*GEOFFREY WHITE*

Geoff White  
VECC Counsel

Cc: EGI – Counsel – Dennis O’Leary – [doleary@aird@berlis.com](mailto:doleary@aird@berlis.com)