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# Intervention Form

## Case Number:

EB-2025-0172

## 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:

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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:**

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## **Other Contacts:**

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## **Frequent Intervenor Form:**

## **OEB Proceedings:**

EB-2024-0004 EB-2024-0006 EB-2024-0007 EB-2024-0008 EB-2024-0010 EB-2024-0022

EB-2024-0024 EB-2024-0030 EB-2024-0031 EB-2024-0046 EB-2024-0058 EB-2024-0063  
EB-2024-0067 EB-2024-0078 EB-2024-0092

## **Issues:**

VECC's members are customers of the Applicant and will be materially affected. VECC has been granted party status in rate applications of both ENWIN Utilities and E.L.K. Energy which are, as described in this application, ultimately to be amalgamated.

VECC's interest in this application are with respect to the stated rate plan for the two utilities which is to propose new cost of service rates for the two separate utilities prior to their amalgamation. VECC recognizes (as does the Applicant – see page 6) that the panel of the Board considering this application cannot bind a future OEB panel with respect to rate plans. However, the Applicant has raised the issue in this application and seeks comfort for its proposal. VECC is interested in understanding whether a more appropriate proposal would be to seek to amalgamate and harmonize rates in the first instance and at the same time.

We expect our participation to be limited to understanding the future rate plans of the applicant and so as to make submissions, if required, as to guidance the reviewing panel might provide and so that the applicant considers future rate plans in a fashion which is not determinantal to ratepayers (and especially the ratepayers of E.L.K). In the alternative we are concerned a future Board panel might be unnecessarily constrained in considering the most efficient way to harmonize the rates of E.L.K and ENWIN.

## **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 intend to file 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:**

English