



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

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Michael Buonaguro
Counsel for VECC
(416) 767-1666

November 14, 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)
Notice of Intervention: EB-2008-0245
Thunder Bay Hydro Electricity Distribution Inc. – 2009 Electricity
Distribution Rate Application

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

Although our records indicate having prepared a Notice of Intervention for this file for delivery on October 7, 2008, it appears that, through inadvertence, it was not filed on that day. We only became aware of the problem when another intervenor informed us, having known that we had intended to intervene, that the procedural order had just been released and that we were not listed as an intervenor.

We note that in this case in particular there are no other intervenors representing the interests of residential class rate payers, it being generally known by other intervenors that VECC was intending to intervene on behalf of vulnerable consumers within the residential rate class. We also note in particular that the cost allocation proposal put forward by the utility has residential consumers about the Board's recommended range, which is an issue of particular interest to VECC.

We apologize for our mistake, and respectfully ask that the Board consider accepting our late intervention in this case.

Thank you.

Yours truly,



Michael Buonaguro
Counsel for VECC

cc: Mr. Robert Mace, President
Thunder Bay Hydro Electricity Distribution Inc.

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 Thunder Bay Hydro Electricity Distribution Inc. 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: Mr. Robert Mace, President
Thunder Bay Hydro Electricity Distribution Inc.

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:

660 Briar Hill Avenue, Suite 207
Toronto, ON
M6B 4B7

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) 348-0641 (fax)

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

6. VECC requests that copies of the Application and any additional supporting materials be forwarded to each of the two parties named above.
7. 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 2009. Areas of the current Application of interest to VECC include; a) the material increase in capital spending for 2009; b) the load forecast methodology; c) the proposed LRAM/SSM recovery; and d) allocation of costs to customer classes.
8. VECC strongly supports the Board's proposal to include an "oral component" as part of the review process. In VECC's view the actual form of this component (technical conference versus oral hearing) is best

determined after the interrogatory phase of the process has been completed.

9. VECC will be requesting an award of costs for its participation in this proceeding and believes that, as a coalition representing the direct interests of consumers, it meets the eligibility criteria set out in the Ontario Energy Board's Rules of Practice and Procedure (Section 41) and its' Practice Direction on Cost Awards (Section 3.03).

DATED AT TORONTO, THIS 8th DAY OF OCTOBER 2008

Michael Buonaguro
Counsel for VECC
c/o Public Interest Advocacy Centre