



***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 18, 2008

**VIA MAIL and E-MAIL**

Ms. Kirsten Walli  
Board Secretary  
P.O. Box 2319  
2300 Yonge St.  
Toronto, ON  
M4P 1E4

Dear Ms. Walli

**Re: Consultation on the Development of Demand Side Management  
Guidelines for Natural Gas Distributors  
Board File No.: EB-2008-0346**

Please find enclosed the Notice of Intervention of the Vulnerable Energy  
Consumers Coalition (VECC) in the above-noted proceeding.

Thank you.

Yours truly,

Michael Buonaguro  
Counsel for VECC  
Encl.

**Re: Consultation on the Development of Demand Side Management  
Guidelines for Natural Gas Distributors  
Board File No.: EB-2008-0346**

**NOTICE OF INTERVENTION  
OF THE  
VULNERABLE ENERGY CONSUMERS COALITION**

To: Ms. Kirsten Walli  
Board Secretary

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. Although the organization is not itself a member of VECC, the Public Interest Advocacy Centre (PIAC) in Ottawa assists in the representation of the interests of vulnerable consumers by ensuring the availability of competent representation and advice to the VECC participation.

5. 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) 767-1666 (fax)  
[mbuonaguro@piac.ca](mailto:mbuonaguro@piac.ca)

6. VECC would request that all correspondence and documentation also be copied to VECC's consultant:

Mr. Roger Higgin  
Econalysis Consulting Services

34 King Street East, Suite 1102  
Toronto, Ontario  
M5C 2X8  
(416) 348-9391 (office)  
(416) 348-0641 (fax)  
rhiggin@econalysis.ca

7. VECC requests that copies of the Application and any additional supporting materials be forwarded to each of the two parties named above.
8. VECC is intervening in order to ensure that consumer interests and in particular the interests of the low-income and vulnerable users of natural gas are fully represented in the development of Natural Gas Demand Side Management Guidelines.
9. VECC has established a long-standing interest and history in the development of demand side management policy and programs within the OEB regulatory context, including active participation in the EB-2006-0021 process. Additionally VECC has worked actively with natural gas distributors in the ongoing implementation and evaluation of their respective DSM programs, including providing a VECC representative for the EGDI DSM Evaluation and Audit committee (EAC). VECC has also maintained a consistent and fully participatory role in Board (and non-Board) processes related to Conservation and Demand Management in the electricity sector on behalf of vulnerable and low income consumers.

Additionally, VECC's consultants are very familiar with Gas and Electricity DSM/CDM programs across multiple Jurisdictions.

9. VECC will be requesting an award of costs for its participation in this proceeding and believes that it meets the eligibility criteria set out in the Ontario Energy Board's Rules of Practice and Procedure and its Practice Direction on Cost Awards.

DATED AT TORONTO, THIS 18<sup>th</sup> DAY OF NOVEMBER, 2008

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