From:	Office of the Registrar
To:	Susi Ahlborn
Subject:	FW: Intervention Form: 2025-0252 - Vulnerable Energy Consumers Coalition
Date:	Monday, November 17, 2025 10:50:47 AM

From: Ontario Energy Board <webmaster@oeb.ca>
Sent: Monday, November 17, 2025 10:49 AM
To: Office of the Registrar <Registrar@oeb.ca>
Cc: dbrady@piac.ca
Subject: Intervention Form: 2025-0252 - Vulnerable Energy Consumers Coalition

Intervention Form

Case Number:

2025-0252

Requesting information on behalf:

Not specified

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
markgarner@rogers.com
647-408-4501

Bill Harper
bharper.consultant@bell.net
905-883-1727

Cost Claim Filing contact:

Donna Brady
dbrady@piac.ca
613-562-4002

Other Contacts:

Frequent Intervenor Form:

Add all individuals listed on our Frequent Intervenor Form as contacts for this proceeding:

N/A

Names and email addresses of individuals to be added as contacts for this proceeding:

N/A

OEB Proceedings:

Item Description	Category	Status
EB-2024-0039	Electricity – Rates	Granted
EB-2024-0309	Electricity – Rates	Granted
EB-2024-0111	Electricity – Rates	Granted
EB-2024-0030	Electricity – Rates	Granted
EB-2024-0022	Electricity – Rates	Granted
EB-2024-0058	Electricity – Rates	Granted
EB-2024-0046	Electricity – Rates	Granted
EB-2024-0010	Electricity – Rates	Granted
EB-2024-0008	Electricity – Rates	Granted
EB-2024-0007	Electricity – Rates	Granted

Issues:

VECC's members are customers of the Applicant and will be materially affected. This is the first cost of service of the utilities that began amalgamating in 2016. VECC has been a party to numerous MAADs and ICM applications of Alectra Utilities Corporation (AUC) that have occurred during that time. Most recently VECC was granted intervenor status in AUC's ICM application EB-2023-0004. Based on 2017 recorded costs Alectra Utilities Corporation (AUC) is seeking to recover an increase of over 70% in operating costs. The Utility is also proposing to spend significantly larger amounts on distribution capital in the upcoming rate plan. The result is a requested base revenue requirement that is over 50% higher than the 2019 actual amount. The application also includes a custom rate framework that may result in rates higher than might otherwise be the case under the Board's IRM policies. Alectra Utilities is

proposing a rate harmonization plan and is seeking approval of the methodology and approach used to harmonize distribution, retail transmission, low voltage, and loss factors across its five rate zones. This includes proposals for the elimination of some rate zone specific classes. VECC has an interest in all the issues of this application and that 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 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