



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

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January 14, 2009

VIA MAIL AND EMAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
26th Floor
2300 Yonge Street
Toronto, ON
M4P 1E4

Dear Ms. Walli:

**Re: Letter of December 23, 2008 regarding the OEB's Consultation on
Transition to International Financial Reporting Standards and Consequent
Amendments to Regulatory Instruments
Board File Number: EB-2008-0408**

Participation of the Vulnerable Energy Consumers Coalition (VECC)

As Counsel to the Vulnerable Energy Consumer's Coalition (VECC), I am writing, per the Board letter of December 23rd, 2008 to indicate VECC's interest in participating in the EB-2008-0408 consultation process.

Interests Represented

VECC is a coalition of groups that represents the interests of those energy consumers who, because of their household income, or other distinguishing characteristic such as age, literacy, etc, have a set of concerns that may differ in kind, and, in magnitude, from those of more affluent residential consumers as well as commercial and industrial consumers. The Vulnerable Energy Consumers Coalition (VECC) is currently comprised of the Ontario Coalition of Senior Citizens (OCSCO), and the Federation of Metro Tenants Association.

OCSCO is itself 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 memberships. OCSCO's objective is to improve the quality of life for Ontario Seniors.

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.

VECC's constituents' general concerns are that regulated rates for electricity and natural gas service should be kept as low as possible consistent with maintaining acceptable reliability and quality of service. As noted in the Board's letter, the adoption of IFRS may create impacts on distribution rates and other charges and there are choices to be made in the transition to IFRS. As a result, this issue is of significance to VECC's constituents.

VECC's Participation and Request for Costs

At this point, VECC plans on participating in the Issues Meeting scheduled for January 27th, 2009. VECC also intends to request a cost award for its participation in this process 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).

As noted in PIAC's letter of July 14, 2004 on the matter of Stakeholder Participation in the Board's regulatory policy development processes, there are two types of customer and public interest organizations:

- Those that are member sponsored and can allocate a limited amount of staff resources paid out of membership fees to respond to the economic or political interests of their members and
- Public interest groups that are not generally member funded or do not have funds available for tribunal interventions,

VECC is in the latter category and uses the Public Interest Advocacy Centre to provide and co-ordinate the representation of its interests. VECC's constituent organizations, which consist of over one half million members, belong primarily to seniors and tenant groups. In order to provide meaningful and informed comment on the issues on which the Board is seeking input, VECC must either ask its counsel, consultants and advisors to undertake pro bono work or not participate at all, unless cost recovery is available through the Board's cost award process.

VECC would request that both its counsel and its regulatory consultant be placed on the distribution list for future developments. The contact information for both is provided below:

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Mr. Harper's resume can be found at www.econalysis.ca.

Need for "Expert's Report"

In Appendix A, the Board requests input as to whether or not provision should be made for eligible participants to claim the costs of an expert to prepare an "expert report". In VECC's view, it is premature to determine whether an "expert report" is required until after the issues meeting and the completion of the Board consultant's report regarding the nature of the choices involved in implementing IFRS. VECC would prefer to address this point after these milestones have been achieved.

Yours truly,

Michael Buonaguro
Counsel for VECC