



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

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July 25, 2014

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)
Initiative to Develop Electricity Distribution Reliability Performance
Targets - EB-2014-0189**

Please find enclosed the notice of intent to participate and seek costs in the above-noted proceeding.

Yours truly,

Michael Janigan
Counsel for VECC

cc: Mr. Paul Gasparatto, Ontario Energy Board
e-mail: paul.gasparatto@ontarioenergyboard.ca

ONTARIO ENERGY BOARD

**INITIATIVE TO DEVELOP ELECTRICITY DISTRIBUTION SYSTEM
RELIABILITY PERFORMANCE TARGETS**

**NOTICE OF INTENT TO PARTICIPATE
VULNERABLE ENERGY CONSUMERS COALITION**

To: Ms. Kirsten Walli
Board Secretary

And to: Mr. Paul Gasparatto

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 (FTMA)
- (b) The Ontario Coalition of Senior Citizens' Organizations (OCSCO)

2. The Federation of the Metro Tenants Association (the "FTMA") 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 160 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:

333 Wilson Avenue, Suite 406
Toronto, ON
M3H 1T2

4. The coalition of the FMTA and OCSCO under the name VECC has the specific mandate of intervening in proceedings to advocate on behalf of the interests of Ontario's vulnerable consumers with respect to energy issues, primarily through intervention in regulatory proceedings at the Ontario Energy Board.
5. 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 consultant support to VECC.
6. The name and address of the agent authorized to receive documents on behalf of VECC is:

Mr. Michael Janigan
Counsel
Public Interest Advocacy Centre (PIAC)
One Nicholas Street, Suite 1204
Ottawa, Ontario
K1N 7B7
(613) 562-4002 extension 26 (office)
(613) 562-0007 (fax)
mjanigan@piac.ca

7. VECC would request that all correspondence and documentation also be electronically copied to VECC's consultants:

Mark Garner (project manager)
Econalysis Consulting Services
34 King Street East, Suite 1102
Toronto, Ontario
M5C 2X8
(647) 408-4501 (office)
(416) 348-0641 (fax)
markgarner@rogers.com

and

Bill Harper
Econalysis Consulting Services
34 King Street East, Suite 630
Toronto, Ontario
M5C 2X8
bharper@econalysis.ca

8. The stated intent of the consultation is to establish performance targets for reliability and to consider customer specific reliability measures. VECC's interests are with respect to what measures will best serve consumers and the costs that may be required to be borne by customers in pursuit of such objectives.
9. VECC has previously been approved as an intervenor in proceedings related to the cost and efficiencies of distribution utilities services and in numerous rate setting proceedings. As such VECC has a direct interest in the outcome of this consultation. 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.

10. 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). We understand that awards are limited to a maximum of 14 hours.
11. VECC's members do not have access to the direct funding required to retain appropriate legal and consulting support for its intervention in OEB proceedings. Accordingly VECC relies on PIAC to provide legal support and retain qualified consultants on the basis that PIAC can recover the related fees and disbursements from the Board based on the Board's Practice Direction on Cost Awards at the prevailing Cost Award Tariff.

DATED AT TORONTO, JULY 25, 2014