



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

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September 15, 2006

VIA EMAIL AND COURIER

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
27th Floor
2300 Yonge Street
Toronto, ON
M4P 1E4

Dear Ms. Walli:

**Re: Vulnerable Energy Consumers Coalition
Notice of Intervention: EB-2006-0207
Board's Review of the Ontario Power Authority's Integrated Power
System Plan – Consultation Process**

Participation of the Vulnerable Energy Consumers Coalition (VECC)

1. I am Counsel with the Public Interest Advocacy Centre (PIAC) and counsel to the Vulnerable Energy Consumers' Coalition (VECC). In response to the Board's September 1st, 2006 correspondence, VECC plans on actively participating in the above mentioned consultation process. VECC consists of the following organizations:
 - (a) The Federation of Metro Tenants Association and
 - (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:

500-3101 Bathurst Street
Toronto, ON
M6A 2A6

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 intervention. As well, PIAC coordinates the participation of VECC with the ongoing efforts to advance the interests of the specific constituency outside of the formal hearing process. PIAC has played this role in energy policy and ratemaking in Ontario for over two decades.

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) 348-0641 (fax)
mbuonaguro@piac.ca

6. 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

Interest of VECC in the Proceeding

7. VECC is a coalition of groups that represents the interests of those energy consumers who, because of their distinguishing characteristics such as household income, age, literacy, etc, have a set of concerns that may differ in kind, and, in magnitude, from those of average residential consumers, as well as commercial and industrial consumers. VECC's constituents' general concerns are that electricity rates should be kept as low possible consistent with the need to maintain the reliability and quality of service.

In this regard, the integrated power system supply plan will have a major impact on overall electricity costs and reliability in the future. Furthermore, the process used by the Board in reviewing the OPA's proposed IPSP and, in particular the information the OPA will be required to provide in support of the plan will be critical elements in ensuring a transparent and effective process and demonstrating that the plan is economically prudent and cost effective.

VECC's Request for Cost Award

8. VECC will be requesting an award of costs for its participation in this consultation process 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.
9. 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.

I look forward to a favorable response to this request.

Yours truly,



Michael Buonaguro
Counsel for VECC

cc. Miriam Heinz, OPA