



PUBLIC INTEREST ADVOCACY CENTRE  
LE CENTRE POUR LA DÉFENSE DE L'INTÉRÊT PUBLIC

June 10, 2015

VIA 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: OEB Practice Direction on Cost Awards  
Vulnerable Energy Consumers Coalition (VECC) filing pursuant to sec. 3.03.1**

Please find enclosed the filing of the Vulnerable Energy Consumers Coalition (VECC) pursuant to sec. 3.03.1 of the OEB Practice Direction on Cost Awards. Would you please advise if any further information may be required under the aforesaid section.

Yours truly,

A handwritten signature in black ink, appearing to read 'Michael Janigan', is written over a horizontal line.

Michael Janigan  
Counsel for VECC

**2015**

**Filing of the Vulnerable Energy Consumers Coalition**

**Pursuant to sec. 3.03.1**

**Of the**

**Practice Direction on Cost Awards,**

**April 24, 2014**

**Introduction**

1. The Vulnerable Energy Consumers Coalition (VECC) is an unincorporated coalition of two major Ontario organizations, the Ontario Coalition of Senior Citizens Organizations (OCSCO) and the Federation of Metro Tenants Associations (FMTA) facilitated by the assistance of a national non-profit charitable organization, the Public Interest Advocacy Centre (PIAC). This filing describes the purpose of VECC and describes the membership, constituency, and types of programs and activities that each coalition member carries out. It also notes the role of PIAC in facilitating the representation of VECC.

**VECC Coalition**

2. 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.
3. 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 with the result that just and reasonable rates were put in place.

4. The Federation of the Metro Tenants Association (the “FTMA”) is a Toronto non-profit corporation composed of over ninety-two affiliated tenants associations, plus thousands of 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, referrals and assistance to tenants.

5. FMTA wishes to note that:

“Understanding the importance of energy costs to our members requires understanding the state of tenancy costs in Ontario. In Ontario, the vacancy rate for apartments hovers around 2.5% while in Toronto it is close to 1.5%. This has created intense pressure on rent escalation which is squeezing tenants. In addition to rising rents driven by energy costs, 25% of tenants pay their own electricity bills. The reduction in rates through intervention is critical to our members’ ability to pay their rent and expenses.”

FMTA’s principal representative is Geordie Dent, Executive Director whose coordinates are the following:

FMTA  
500-27 Carlton Street  
Toronto, ON  
M5B 1L2  
(416) 646-1772 fax (416) 921-4177  
[fmta@torontotenants.org](mailto:fmta@torontotenants.org)  
[www.torontotenants.org](http://www.torontotenants.org)

6. The Ontario Coalition of Senior Citizens Organizations (OCSCO) is a provincial organization and a registered charity. Founded in 1986, its mission is to improve the quality of life for Ontario’s seniors by encouraging seniors’ involvement in all aspects of society, by keeping them informed on

current issues, and by focusing on programs to benefit an aging population. OCSCO offers education programs, policy and research, information, referral, counseling, research materials, outreach and support, self-help and volunteer programs. OCSCO's membership includes over 160 seniors' organizations and individuals representing 500,000 senior citizens from across Ontario. OCSCO is community-based and not-for-profit and includes organizations representing seniors, ethno cultural, health, native, recreational, retiree, disability and women's organizations. OCSCO members are kept informed of the activities of VECC through the organization web site.

OCSCO's principal representative is its Executive Director, Elizabeth MacNab.

OCSCO's address and coordinates for OCSCO are is:

OCSCO  
333 Wilson Avenue, Suite 406  
Toronto, ON  
M3H 1T2  
Email : [ocsco@ocsco.ca](mailto:ocsco@ocsco.ca)  
Phone: 416-785-8570 / 1-800-265-0779  
<http://www.ocsco.ca/>

7. PIAC is an Ottawa-based, non-profit charitable status corporation established in 1976 to assist in the representation of these elements of the public interest that do not have the resources to represent themselves. It provides legal advice, representation, and specialized research on a non-profit basis to groups and individuals who are voicing public concern, and who would otherwise not have access to such services.
8. Since its inception, PIAC has made issues associated with the regulatory process for important public services a priority. In particular, the Centre has developed a reputation for providing effective advocacy in the regulation of telecommunications, cable broadcasting, energy, transportation and privacy. PIAC's work also includes issues of effective consumer protection and

redress, e-commerce, competition law and policy and the consumer interest in international trade agreements.

9. 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 employee/agents for PIAC, but recommended by PIAC for VECC retainer as a result of their regulatory experience with energy issues and regulation .
10. VECC representation is thus 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.
11. VECC engages legal counsel and consultants from time to time to assist in its representation before the Board. In addition to the organization officers listed above, the counsel and consultants currently engaged when necessary, include the following:  
  
Michael Janigan. Legal Counsel  
  
Bill Harper, Analyst /Consultant  
  
Mark Garner, Analyst/ Consultant  
  
James Wightman, Analyst/ Consultant  
  
Shelley Grice, Analyst/Consultant
12. The CVs of individuals, set out in paragraph 11, are on file with the Ontario Energy Board.

**\*\*\*Submitted June 10, 2015\*\*\***