



Low-Income Energy Network

Sent by courier and through the Board's web portal

October 26, 2012

Ms. Kirsten Walli
Board Secretary
P.O. Box 2319
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, ON M4P 1E4

**Re: Renewed Regulatory Framework – issuance of Board Report and Next Steps
EB-2010-0377, EB-2010-0378, EB-2010-0379, EB-2011-0043 and EB-2011-0004–
request for intervention and cost eligibility by LIEN**

Dear Ms. Walli:

The Low-Income Energy Network (LIEN) represents 90 member groups across Ontario. As a network representing the intersection of interests related to low-income consumers and energy and sustainability, LIEN's focus is on reducing the energy bills of all low-income consumers by providing low-income consumers with affordable energy rates and the opportunity to better manage their energy bills. This includes helping to ensure that there are: efficiencies in distributor operations, effective customer care policies appropriately applied, appropriate integrated planning of network investment, and appropriate metrics for monitoring and reporting utility performance. It also includes ensuring that all low-income consumers across Ontario have access to affordable conservation and efficiency programs, technologies and services as well as conservation education, and realize the environmental, energy and economic benefits associated with the more efficient use of energy.

Nature and scope of intervention

Together with the interests of its numerous supporting organizations and individual members, LIEN has an interest in all regulatory matters that impact the affordability of residential rates, thus impacting the affordability of rates for low-income consumers. LIEN is seeking to participate in all the policy areas identified under the RRFE: performance and benchmarking, regional infrastructure planning, development of the smart grid and integrated approach to network investment planning as all these areas will have an impact on the affordability of residential rates and therefore, the affordability of rates for low-income consumers. Of note, is that the RRFE requires that rate mitigation be integrated into the planning and rate-setting processes. LIEN's involvement in the regional planning, smart grid and integrated approach to investment planning consultations will address rate mitigation matters as well as other aspects of rate affordability.

c/o Advocacy Centre for Tenants Ontario (ACTO)
425 Adelaide St. West, 5th floor, Toronto, ON M5V 3C1
Phone: 416-597-5855 ext. 5167 1-866-245-4182 Fax: 416-597-5821

LIEN has had a long standing interest in performance and benchmarking demonstrated by its submissions on customer care issues and in previous consultations on the RRFE. LIEN kindly requests that the Board consider LIEN for inclusion as a member of the Working Group on Performance and Benchmarking.

LIEN's interest in the RRFE consultations is to protect the interests of low-income consumers by bringing its knowledge and experience to assist the Board.

Costs

LIEN requests that the Board find it eligible for costs under section 3.03 (a) of the Board's Practice Direction on Cost Awards for participation in all the policy areas identified for the RRFE as described above. LIEN "primarily represents the direct interests of residential consumers in relation to regulated services." LIEN has been accepted as a party eligible for an award of costs in other proceedings before the Board, including the previous consultations under the RRFE.

As a not-for-profit organization, LIEN's participation in this proceeding is dependent on any cost awards it receives. LIEN intends to coordinate its efforts with other intervenors to avoid duplication where possible.

LIEN has retained Judy Simon of Elenchus Research Associates (Elenchus) to provide consulting advice to LIEN in this proceeding. Ms Simon is an expert in low-income rate matters and has been retained for expert advice in many proceedings by LIEN, and other clients.

Sincerely,



Zee Bhanji
Coordinator
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