



**FINANCIAL SERVICES DEPARTMENT
KITCHENER UTILITIES**

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BY E-MAIL & COURIER

April 17, 2009

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

Dear Ms. Walli:

**Re: EB-2008-0150 – Energy Issues Relating to Low Income Consumers – Report of the Board
Written Comments of the City of Kitchener (“Kitchener”)**

Pursuant to the Ontario Energy Board’s (“Board’s”) letter dated March 10, 2009, Kitchener is pleased to submit its brief written comments on the Report of the Board (“Report”) with respect to the Low-Income Energy Assistance Program (“LEAP”).

Kitchener is generally supportive of the LEAP and agrees with the Board that the financial assistance and conservation and demand management policies identified in its Report are directionally sound. The LEAP essentially rests on “three legs” comprised of emergency financial assistance for bill payment; tailored customer service measures; and, targeted conservation and demand management programs. This is a sensible and inclusive approach.

Kitchener is also of the view that the Board has captured the guiding principles very well. In particular, we appreciate the recognition that partnerships between distributors and social agencies are essential to effective development and delivery of LEAP, and that eligibility for assistance should be based on need, as determined by a social service agency.

With respect to funding of LEAP, Kitchener takes note of the Board’s strong encouragement at page 10 of the Report to non-rate regulated distributors to collect a similar level of funding through distribution rates as the rate regulated distributors are directed to do. Kitchener also notes the Board’s encouragement to distributors to seek to augment funding from other sources such as voluntary charitable donations.

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We agree with the Board that policies may need to evolve in response to issues arising from the broad implementation of LEAP. Some evolution may occur as a result of unintended effects. For example, Kitchener remains concerned with ensuring the privacy of program participants. Some of the tailored customer service measures that are currently proposed may present unintended risks of breaching privacy by something as seemingly mundane as a different payment method that is visible or audible in a public setting.

Given the multi-faceted structure of LEAP and its broad implementation across the province and the electricity and gas sectors, with active involvement from many diverse stakeholders, we respectfully suggest that its implementation by November 2009 presents quite a challenge. Of course, some elements can be expected to roll out more smoothly than others. Board staff may consider setting up sub-groups within the LEAP Implementation Working Group to be established by the Board to expedite the Group's efforts. These procedural matters can be addressed fairly quickly and Kitchener welcomes the opportunity to participate in the Working Group process as it develops.

Kitchener thanks the Board for this opportunity to provide its written comments on the Report and hopes they are helpful.

Sincerely,



James A. Gruenbauer, CMA
Manager, Regulatory Affairs and Supply

Cc: W. Malcolm (Kitchener)
J. Alick Ryder, Q.C. (RWBH)
Participants in EB-2008-0150