

Ontario Energy Board

Low-Income Energy Assistance Program Report of the Board

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Ontario Power Authority Comments

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BACKGROUND

On March 10, 2009, the Ontario Energy Board (the “Board”) issued for comment its “Report of the Board: Low-Income Energy Assistance Program” (the “Report”). The Report set out the Board’s policies for implementation of the Low-Income Energy Assistance Program (“LEAP”), consisting of three components: (1) temporary financial assistance for low-income energy consumers in need; (2) the benefit of access to more flexible customer service rules on matters such as bill payment and disconnection notice periods; and (3) targeted conservation and demand management programs. Parties were asked to provide comments with respect to implementation of LEAP.

COMMENTS

The Ontario Power Authority (“OPA”) fully supports the Board’s efforts to ensure a province-wide approach to assisting low-income energy consumers. Through its mandate to ensure that conservation targets for the province are met, the OPA’s primary concern is to ensure full accessibility for all participants in conservation in order to fulfill provincial policy objectives. Accordingly, the OPA’s comments are primarily focussed on the implementation of the third component of LEAP, namely, “targeted conservation and demand programs”.

The Board’s Report concludes that determination of eligibility for the LEAP program should be left to social service agencies. While this is a reasonable threshold to establish for the receipt of financial assistance, or more flexible customer service rules, the OPA suggests that it may be overly restrictive as a threshold for participation in CDM programs targeted to low income energy consumers.

The OPA has proposed eligibility for its low-income programs based on its income threshold table, which is illustrated below. This table was developed for the OPA’s pilot program by Green Communities Canada for low-income applicants who have not enrolled in any social programs. The income levels incorporated in the table correspond to the most generous of the low-income cut-offs calculated by Statistics Canada by household size and urban/rural status.

Household size	Maximum gross annual income
One	\$32,000
Two	\$34,500
Three	\$37,000
Four	\$39,500
Four+	\$39,500 + \$2,500 for each additional occupant

Experience gained during the pilot phase of OPA's low-income CDM programs has shown that expanding eligibility to include these applicants increases participation rates in these programs. The use of this screening device provides solutions for low-income participants who may be employed, or would not otherwise qualify for social assistance, or who may not self-identify as "low-income".

Expanding the definition of low-income for the purposes of participation in CDM programs would allow these consumers to take advantage of the benefits offered by these programs. Referrals to CDM programs could be provided by either LDC staff or social service agencies, allowing an avenue for assistance when social service payments are not an option. Use of this already-developed eligibility threshold mechanism would also relieve LDCs of the administrative burden of separately tracking LEAP participation in these programs for the purposes of meeting low-income conservation targets set by the OEB.

The OPA is supportive of the Board's proposal to establish a LEAP Implementation group. Coordinated effort among stakeholders will assist, not only with timely and efficient roll-out, but will aid in the goal of ensuring that the program is applied consistently province-wide. The OPA looks forward to participating in the implementation group to assist in coordinating consistent delivery of targeted low-income CDM programs with LDCs, and in providing energy saving education materials for inclusion within the Board's "Energy Choice is Yours" campaign.

The OPA wishes to thank the Board for this opportunity to provide its comments in this matter, and would be happy to provide further clarification if needed.