



May 19, 2009

Via E-Mail and Canada Post

Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
Suite 2700
Toronto, ON. M4P 1E4

Re: LEAP Implementation Working Groups EB-2008-0150

Dear Ms. Walli

I am writing to register Direct Energy's interest in participating in the Low-Income Energy Assistance Program (LEAP) Financial Assistance and Conservation Working Groups. Direct Energy (DE) will be representing the collective interests of the marketers and retailers that are members of the Ontario Energy Association. Although retailers and marketers were not explicitly mentioned in the Board's invitation letter, this group is a significant component of Ontario's energy markets touching millions of consumers every day across the Province. DE in particular is well placed to represent the marketer and retailer group given its extensive experience from different programs in North America, as well as Centrica's significant involvement in the UK. This experience highlights the effective contribution that marketers and retailers can make to assisting low-income consumers:

1. DE, and its UK parent, Centrica, have a long history of successfully developing and implementing programs targeted at assisting low-income consumers. In Texas, where retailers bill their customers directly, DE has implemented a program called 'Neighbor-to-Neighbor'. This is an energy bill-payment assistance program designed to help customers experiencing financial difficulties. Each year, DE donates funds to local community action agencies. DE's customers can also help support their neighbours by making a contribution to the program through an option on their monthly bill. Since 2003, DE has donated more than \$2.5 million to the program and has helped more than 10,000 Texans with their home energy expenses.
2. DE also has experience in implementing energy efficiency programs targeted at low-income consumers. Direct Energy has been working with the City of Houston since 2007, providing weatherisation services to Houston's oldest and most vulnerable neighborhoods as part of the City's Residential Energy Efficiency Program (REEP). As a lead service provider and marketing partner, Direct Energy has weatherized more than 3,000 homes, helping reduce average energy usage by 19% per household. Weatherization measures included as part of REEP, and delivered by DE, include an initial home energy audit, replacement of incandescent lights with compact fluorescent light bulbs (CFLs), replacement/installation of ceiling fans, sealing of the building envelope, including duct work, windows, and doors, and insulation top-ups, to name a few.

DE is also an active participant in the Ontario marketplace generally. It has a thorough understanding of the legal and regulatory framework under which natural gas and electricity distributors operate, including the DSM requirements. DE is also very familiar with the role of the Ontario Energy Board within the Ontario marketplace and has intervened in a number of proceedings in relation to the regulation of natural gas and electricity distribution companies. Our research and participation in this proceeding to assist low income consumers has also ensured we have a thorough understanding of the agencies already operating in the field and the challenges faced by this group of consumers.

Furthermore, the Board itself has included marketers and retailers within the scope of the program. In its LEAP report, the Board has indicated that the *"low-income energy consumer assistance may include temporary relief from amounts owing for commodity purchased from electricity retailers and natural gas marketers"*. The report also says that *"the Board strongly encourages these licencees to offer contributions to a distributor's LEAP in areas where they have customers"*.

In sum, we strongly feel that retailers and marketers must be included in discussions regarding the implementation of the LEAP including funding arrangements, conservation program designs and reporting requirements along with other market participants.

Direct Energy will not be requesting a cost award for participating in this process.

We thank the Board for this opportunity to participate and look forward to providing Direct Energy's input on this important issue.

Yours faithfully

Chantelle Bramley
Senior Director
Government & Regulatory Affairs
Direct Energy Marketing Limited

**DIRECT ENERGY MARKETING LIMITED
NOMINATION TO THE ONTARIO ENERGY BOARD'S
LEAP FINANCIAL ASSISTANCE
AND
CDM WORKING GROUPS**

Nomination

Chantelle Bramley, Senior Director, Government & Regulatory Affairs

Relevant Experience and Qualifications

Chantelle joined Direct in September 2005. Her role with DE includes all aspects of government and regulatory affairs as well as the oversight of compliance and licensing issues. She draws from the experience of all DE business units and provides input to Government, regulatory bodies and stakeholders based on DE's experience and in-house research on a number of issues, including electricity/gas market organization, consumer issues, CDM/DSM programs, conservation and energy efficiency funding, etc. Chantelle was extensively involved in the low-income consultation and developed submissions on the LEAP design. She has held a number of internal meetings with DE's business units based in the UK and North American markets on issues related to low-income consumer assistance mechanisms and programs and brings a wealth of practical expertise on this matter.

In her current role Chantelle also supervises Compliance & Licensing, including managing our Sales & Code of Conduct compliance regimes, compliance training, refining the existing sales & code of conduct frameworks, dealing with compliance issues, and developing input to Government, regulatory bodies, and stakeholders on existing and developing compliance and other issues of interest to DEML.

Chantelle brings a broad range of expertise and experience in regulatory economics and industrial organization. Prior to joining Direct, Chantelle worked at TransAlta, one of the largest electricity generators in Alberta, in the Market Analysis group and was responsible for providing power price forecasts, regulatory analysis and strategy recommendations for all Western US and Canadian markets. This experience built on the work undertaken at the Canadian Energy Research Institute where as Senior Economist, Chantelle worked on wholesale and retail competition issues in the Alberta power and gas industries.

Before arriving in Canada, Chantelle spent 5 years in the United Kingdom working as an antitrust economist. Her work there involved the provision of economic and econometric analysis in support of regulatory and competition cases on behalf of government, regulatory and competition agencies, as well as large companies. She worked on projects for the Government of the Cayman Islands, the UK Office of Fair Trading, Roche Pharmaceuticals, Granada Media, Sainsbury's and IBM.

Chantelle has an Honours degree in Economics from the University of Sydney, Australia and a Masters of Science in Economics from University College London. Her masters dissertation focused on the European Commission's treatment of research joint ventures within the context of antitrust regulation.