



Direct Energy

Financial Assistance Working Group – Framework template

Please complete the following template for each element of the framework for the emergency financial assistance component of the Low-Income Energy Assistance Program (LEAP).

Direct Energy, along with other retailers and marketers in Ontario, welcomes the opportunity to identify solutions that would assist low income consumers better manage their electricity and the gas bills. Many retailers and marketers are already contributing to energy bill assistance programs, while others are working on developing strategies to assist their low-income, vulnerable, and disadvantaged customers. Participation in the LEAP is therefore part of an overarching corporate responsibility program that many market participants seek to implement.

Direct Energy has had a history of delivering successful programs for low income customers in the US and UK markets. In the UK our “Essentials tariff Plus” provides a lower rate and free energy efficiency solutions to low-income British Gas’ customers. In Texas our Neighbour-to-Neighbour and Fresh Start program funded with DE voluntary contributions has helped over 10,000 Texans with emergency energy bill payments. We also provide a 10% discount to our eligible low income customers in Texas through a program funded by a system benefit charge.

However the regulatory framework in Ontario is very different from the one in Texas. In particular, Ontario still has default commodity prices, and retailers cannot recover program costs through ratepayer mechanisms. Our corporate contribution to the program would be purely philanthropic, similar to the donations encouraged from utility shareholders, employees, customers and contributions from businesses and individuals.

Unlike utilities that will see benefit from a bill assistance program that off-sets part of their incurred bad debt, retailers and marketers would likely not see such benefit. The bad debt of retailers and marketers is managed by utilities in Ontario for a fee. Any off-sets of those fees to retailers and marketers are yet to be determined at this point and would depend on future negotiations.

Most importantly, in Ontario retailers and marketers do not own the billing relationship with their customers. This limits the capacity of retailers to refer their customers to bill assistance programs. Finally, retailers and marketers have no guarantees of being recognized for their contribution to a utility funded program.

For all the reasons stated above, retailers and marketers recommend that:

1. The retailers and marketers’ contributions to a utility-funded Emergency Financial Assistance Framework must be voluntary and discretionary similar to the contributions of any other philanthropic donors.



2. The Framework must allow Social Agencies to accept funds from other donors directly, including retailer voluntary contributions.
3. Social agencies must use the same application form both for utility and retailer customers and routinely screen for retail customers even if no retailer fund exists at the moment.
4. The delivery of the program must be awarded to a coordinating social agency through an RFP process. The coordinating social agency may then build on its network of affiliates and satellites.
5. Retailers and marketers must be able to enter a bill assistance program and offer a top-up gas/electricity bill assistance at any time.
6. There should be a mechanism for contribution recognition for donor's, including retailer'/marketers', contributions.

The reasons above guide our recommendations for the template below.

1. **Eligibility and screening:** Characteristics of a participant that make the participant qualified or entitled to receive emergency financial assistance.

Criteria:

**Participant criteria:
(onus Social Agencies)**

- utility customer
- retail customer (even if no specific retailer fund)
- primary/secondary name on the account
- reside at the billing address
- be in need - received disconnection notice
- After-Tax LIM thresholds
- reasonable discretion – any supplemental criteria to be properly documented by social agency and reported to utility/retailer
- arrears smaller than the bill assistance cap

**Assistance criteria:
(onus-market stakeholders within the OEB)**

- meaningful yearly caps (based on EEF historical data)
 - differentiate caps for electricity and gas heated homes

Rationale:

- Benefit going exclusively to utility/retailer customers, to ensure that the utility/retailer is assisting the very customers who contribute to the program through their own utility bills/in case of a retailer funding similar rationale.
- Retail customers must be screened to allow retailers funding top-up at any point in time
- To ensure stewardship and accountability for customer's own energy consumption

- To prevent wasted spending in cases that would result in disconnection regardless of the program
- Utility funding may not be adequate to cover all low income customers in their service territory. Therefore, prioritizing most vulnerable customers is crucial to help those most in need. Social agencies must have discretion to help the working poor when they expect lower program take up or when they have excess of funding, in which case every additional criteria used must be documented and reported to the donor.
- Assistance caps should be based on historical FA program data (for example the EEF). Also, in recognition that customers who reside in electricity heated dwellings pay more to heat their homes, and since they can not apply for emergency assistance funded by a gas utility these customers must be entitled to a higher annual amount

Roles and responsibilities: The major partners in the emergency financial assistance program (e.g. utilities/retailers, social service agencies, OEB, other) and their roles and responsibilities related to eligibility and screening

“The onion approach” - all stakeholders, OEB

- to design an EEP that would allow Social Agencies to easily accept/incorporate other donors’ contributions for emergency bill assistance
- develop an application form with minimum entry requirements, make sure the form also contains a screen for:
 - retail customers (check box) even if there is no retail fund at the moment
 - customer dwelling info (to allow identification and referral to the Energy Assistance Program for older, poorly insulated houses)

2. **Intake and application administration:** The process through which low-income energy consumers are enrolled in the program and receive the emergency financial assistance (e.g. enrolment through to receipt of funds)

- Client fills-in application
- Social Agency notifies utility (at the time of application)
- Utility holds on disconnect
- Social Agency qualifies client
- Social Agency sends cheque on behalf of customer

Roles and responsibilities: The major partners in the emergency financial assistance program (e.g. utilities/retailers, social service agencies, OEB, other) and their roles and responsibilities related to intake and application administration

Utility/Social agency

- Efficient two- way communication channel (contacts on both ends to be specified in a bilateral contract, as well as the process of notifying the utility)

Social agencies

- Maintain a database tracking client data, number of applications per annum, able to accommodate queries for the purpose of other related programs
- Ensure a reasonable client assessment cycle keeping in mind the urgency of assistance (aim to limit it to up to 5 days, best practice - 2 business days)
- Notify utility by the end of the same day the client applies
- Send cheque on behalf of customer right after the customer has been qualified eligible (up to 2 business days after the qualification).
- Keep track of client's history with emergency FA (to ensure there is no abuse of the system, "keep it under the cap" principle)
- Ensure the customer understands who pays for the bill (utility, other customers, the customer himself, other donors if applicable)

Utilities

- Obligation to place a 10 day-hold on disconnection once the social agency notified that a customer has applied for emergency assistance
- Utility initiates the pre-payment arrangement if customer is disqualified for income reasons, etc.
- Notify social agency of any double dipping (if any incidents happen).

Retailers

- Refer customers who claim not to be able to afford their bills due to hardships or emergency situations to the utility bill assistance program, and to retailer assistance if that exists.
- Notify utilities when a Retailer Fund becomes available, the amount of funding, and the conditions of funding disbursement
- Making the coordinating social agency that won the RFP for EA program delivery their first choice in selecting delivering partners
- Leveraging on existing bill assistance infrastructure to reduce administrative costs of the program.
- Communicating to the utility, how many retail customers were served, and the average amount of funding received.

OEB

- Develop in consultation with market stakeholders a Best Practice Guide for intake and application turnaround, to be used by utilities and social agencies for EFA program administration

3. Promotion and outreach: The methods/avenues used to make low-income energy consumers aware of the emergency financial assistance program

- Web-sites
- Bill inserts (mandatory at the time of disconnection notice)
- Visual materials/print-outs/other marketing tools
- Call centres



- Educational programs

Roles and responsibilities: The major partners in the emergency financial assistance program (e.g. utilities/retailers, social service agencies, OEB, other) and their roles and responsibilities related to promotion and outreach

Utilities

- Allocate a portion of the program budget (especially when a program funding >\$100,000) for the print-out of visual materials.
- Mandatory program description and referral to partnering social agencies with their contact information on the utility web-site, customer section
- Visual materials to include banners with utility's logo and program names, pamphlets, brochures that:
 - Provide a description of the program,
 - Specify the contact information of the partner social agencies
 - Disclose funding channels (other donors, distribution rates)
 - Are printed in several ethnical languages of visible minority groups
 - Will be distributed, including with the help of partnering social agencies, to local food banks, thrift stores, OW/ODSP offices, community centers, charities, etc.
- Send bill inserts with referral to program when a disconnection notice is sent to a customer

Retailers

- Distribute program communication materials to customers
- Scripts with referrals developed for retailer call centres
- Distribution of visual materials on their program component to social agencies
- Post information on retailer assistance, program description and referral to social agency partners on their web-site

Social agencies

- Placing visuals (example: utility logo/pamphlets/brochures containing a program description) in halls/ client waiting areas
- Referring customers to utility programs
- Helping utilities/other donors to place program promotion materials in local areas of low income concentration/traffic

OEB

- Post on the OEB web-site/customer section a description of low income programs funded through distribution rates
- Invite social services partnering with utilities to post their contact details on the site to help customers to self-identify



4. **Tracking and reporting:** The program metrics that need to be tracked; and the tracking and reporting requirements of each program partner

Annual program reporting metrics:

- # of distributor customers, of them # of retailer customers
- average \$\$\$ amount of assistance per customer (also by main heating fuel)
- aggregate annual \$\$\$ amounts received by utility from social agencies/off-set utility customer arrears (from all funding streams)
- customer average income at the time of application
- customer average income for program beneficiaries
- average customer beneficiary arrears
- # of customers referred to LI DSM/CDM programs
- other customer statistics (dwelling characteristics, size of the household, number of children per served household, single headed household, etc)

Utility funding reporting by funding streams:

- distribution rate funded
- shareholder contributions
- employee donations
- customer donations
- other donors' contributions

Program administration:

- Utility's partnering social agencies and annual amounts per each partner
- Administrative fee for program delivery as a percent of program cost
- Client assessment turnaround (days)
- Utility notification that customer is under review by social agency (days)
- Cheque mailed on behalf of the customer (days)
- Unspent budgets/shortage of funds
- Overall demand for program services (# of customers that applied after the program funds were exhausted)

Roles and responsibilities: The major partners in the emergency financial assistance program (e.g. utilities/retailers, social service agencies, OEB, other) and their roles and responsibilities related to tracking and reporting

Utilities to report to the OEB:

- all program funding by source
- all program administration metrics listed above
- off-set customer arrears due to the money transferred to utility by social agencies (to include utility funding and other donors)
- program reporting metrics aggregated at the level of utility
- other statistics collected through the social agencies

Social agencies

- Tracking all program metrics enlisted above by utility/retailer in the social agency's service territory
- Report on program administration process statistics (average days spent on client assessment, utility notification, cheques mailed etc)
- Other customer statistics as required by utility

OEB

- Mandate that utilities properly account and report on the funding streams
- Mandate that utilities collect data (see metrics above) from social agencies, analyze it and report it to the OEB.
- Aggregate data at the provincial level and report to the general public and other stakeholders on an annual basis.

5. **Funding:** The process through which monies for financial assistance is dispersed (e.g. utility/retailer to social service agencies to recipient)

Funding to flow to social agencies in three streams:

- I. Utilities (distribution rates, additional funding – shareholder, customer, employee contributions)
- II. Other donors (retailers/marketers, community, ethnic organizations, private corporations, individuals)
- III. Provincial/municipal governments (not discussed below)

Roles and responsibilities: The major partners in the emergency financial assistance program (e.g. utilities/retailers, social service agencies, OEB, other) and their roles and responsibilities related to funding

Process (utility level):

Within a reasonable time before the end of the year, each utility shall announce:

- its budget for the EFA program
- its main social agency partners and the amount assigned to each organization
- The administrative fee it pays the social agencies
- Utility/social agency contacts assigned for program administration
- Plans on using additional voluntary contributions (shareholder/employee/customer) for top up.

Process (other donor level)

- Other donors plan on their contributions
- Contact social agencies to provide top-up funding

Process (funding disbursement)

- Utility to disburse funding to social agency in either lump sums or equal instalments (semi-annually, quarterly)



- Utility may provide additional funding to social agency at a later time in the year subject to contributions collected from other sources (shareholder, employee, customer donations)
- Other donors, as negotiated with social agencies.

1. Long-term coordination and administration:

- b. ***Emergency financial assistance:*** The roles, responsibilities and structure for the long-term coordination and administration
 - c. ***Low-Income Energy Assistance Program:*** The roles, responsibilities and structure for the long-term coordination and administration
- Build in a screening mechanism/or at least a referral mechanism to both programs in the EFA and LI EA program design
 - Utility-social agency cooperation and integrated delivery approach, sharing of contact details of clients. Cross reference clients/automatic client referral when they are found eligible under one program to identify whether client may be eligible for the other program/also referral if customer's situation changes.

Roles and responsibilities: The major partners in the emergency financial assistance program (e.g. utilities/retailers, social service agencies, OEB, other) and their roles and responsibilities related to long-term coordination and administration

Social agencies and utilities:

- One contact point for both programs
- Refer clients routinely to both programs
- Clients participating in one program automatically referred to the other
- Routinely collect information on client's dwelling and its EE
- Include in print-outs info on both programs, highlighting that:
 - Emergency Financial assistance offers an "immediate" solution, while
 - Low Income Energy Assistance program offers a "long-term" solution

OEB:

- Include information on both programs on the OEB web-site,
- Provide a basic eligibility test, that may help customers self-identify

**Ideas for consideration:
Framework for LEAP financial
assistance program**

Low Income Energy
Network

August 4, 2009



Ideas



This presentation is not a formal submission, but rather some ideas for the consideration.

Eligibility and Screening

Criteria:

- INCOME
 - 125% of pre-tax LICO for a community size of 500 000+
 - Considered over a 3-month period
 - Income should be a parameter that is considered, but should not automatically include or exclude anyone
- NEED
 - Extraordinary circumstances such as unexpected disruption in income, illness and family crisis should be considered
 - Social service agencies should be provided with the flexibility to use discretion in the distribution of assistance on an as-needed emergency basis.
- IMPACT
 - Receipt of financial assistance results in ability to sustain housing and energy

Eligibility and Screening con't

Rationale:

- **INCOME**

- LICO is easily available and widely used.
- Eligibility will be increased by using a pre-tax LICO, rather than a post-tax LICO, as the pre-tax LICO is higher than the post-tax LICO and the Low Income Measure.
- The LICO is outdated for two reasons. Firstly, it is based on 1992 expenditures and consumption patterns. Secondly, the figures are always released with a one year lag. Using 120% of pre-tax LICO for a city of 500 000 + is recommended as a way to address the fact that the LICO is outdated.
- Examining the recent income history will allow consideration of loss of income and/or extraordinary expenses.

- **NEED**

- Low and moderate income families often do not have resources to cope with unexpected expenses and/or unexpected loss of income. Further, given the precarious and unstable nature of much of low-wage work and the lack of benefits or paid leave time to cope with occurrences as simple as a sick child to as significant as a catastrophic illness or accident, it is crucial that emergency financial assistance not be solely available on the basis of income, but also on an as-needed basis.

Eligibility and Screening con't

Roles and responsibilities:

- **Oversight bodies:**
 - Eligibility criteria should be reviewed by the oversight bodies on an annual basis. (Oversight bodies: coordinating and administrative body, advisory body, OEB)
 - Advisory body should make recommendations to OEB regarding eligibility criteria.
- **Social service agencies:**
 - The eligibility criteria should be administered fairly and discretion exercised wisely by the social service agencies.

Intake and application

General goals:

- The intake and application process should be simple and accessible.
- Multiple entry points should exist, while containing administration costs
- Intake and application for conservation program should be available at the same time and place as application for financial assistance program.
- A fair, clear, standardized and well-publicized appeal process should be available.

Intake and application con't

Roles and responsibilities:

Utilities:

- Utilities should select social service agencies to deliver and administer program using an RFP process.
- (If a central coordinating and administrative body is tasked with identifying social service agencies to deliver the program, an RFP process should be used and the existing relationships local utilities have with social service organizations should be considered.)
- Selection criteria should include: history distributing funds to low-income people, ability to make referrals to other relevant programs and services, ability and commitment to using data base for tracking and reporting requirements, good governance structures and processes.
- Upon receiving confirmation that a social service agency is working with a customer, the utility should halt any collection or disconnection action on the client's account for a period of 30 days to allow for client appointment to be booked, assessment completed and payment issued

Intake and application con't

Coordinating and administrative body should:

- be responsible for the creation and maintenance of a standardized database.
- establish a clear and simple standardized appeal process that the lead social service agencies should be required to publicize and follow.
- be responsible for creating and updating a standard training manual and training program that lead social service agencies should be required to use in their delivery of training to staff.
 - In addition to the logistics of intake and application procedures and requirements, training topics should include: working with clients in a respectful manner, confidentiality, energy conservation, other services available for referral, data collection and management.

Intake and application con't

Social service agencies:

- Social service agencies should be responsible for administering the intake and application process in a fair, transparent and professional manner and publicizing the availability of an appeal process.
- Social service agencies should be responsible for making a telephone application process available for clients with transportation difficulties and where transportation is a barrier, clients should be permitted to submit their assessment documentation via fax for verification
- With client permission, social service agencies conducting intake should be responsible for contacting the utility to suspend any credit or disconnection action on the applicant's account.
- Lead social service agencies should be responsible for identifying any additional delivery agents required to address geographic expanse and/or the needs of particular communities. (In some communities, a single agency will act as lead and intake.)
- Lead social service agencies should be responsible for conducting the appeal process, using the standardized process established by the coordinating and administrative body.
- Lead social service agencies are responsible for conducting training of all service delivery agents, relying on the standardized training manual and program provided by the oversight body.
- Lead social service agencies are responsible for ensuring intake and application process, including data input on central database, is done to a high standard.

Promotion and Outreach

- Promotional materials should include: flyers, posters, ad copy for advertising in community-based media, PSAs, website, mail outs, bill inserts and on-bill messages.
- Promotional materials should be available in languages other than English and French.
- Promotion and outreach for financial assistance program should be combined with promotion and outreach for energy conservation program.
- Promotion and outreach efforts should be evaluated on an annual basis and adapted as required.

Promotion and outreach con't

Roles and responsibilities:

Coordinating and administrative body:

- Coordinating and administrative body should create a distinct website for LEAP. There should be a prominent link to the LEAP website on the OEB website. Information about the program including eligibility criteria, the type of assistance available and local contacts should be included.
- Coordinating and administrative body is responsible for creation and distribution of promotional materials to utilities that can be adapted for local use.
- Coordinating and administrative body is responsible for annual evaluation of promotion and outreach.

Utilities:

- Utilities are responsible for local distribution of promotional materials to organizations including: social service agencies, welfare offices, schools in low-income neighborhoods, churches, EI offices, bankruptcy offices, financial planning services and MPPs' offices.
- Utilities should be encouraged to adapt standardized promotional materials rather than produce their own materials in order to build broader public support for and awareness of LEAP.

Social service agencies:

- Lead social service agencies should be required to assist with distribution of promotional materials (If lead social service agencies do not have the capacity to distribute such resources, they should provide the coordinating and administrative body with the contact information for the appropriate venues in their service territory.)

Tracking and reporting

- Good data collection and analysis is key to LEAP's success
 - Collection of data is critical to ensure LEAP can be effectively evaluated and adapted. Without good data, the program will not succeed.
- A centralized database is essential: Who, why, what, when, where
- Data that should be collected includes:
 - Reasons people were found ineligible for assistance
 - Amount of assistance provided
 - Number of grants distributed
 - Whether other forms of funding were required to halt disconnection
 - Cause of emergency
 - Total amount of arrears owing
 - Payment schedule arranged
 - Whether disconnection has already occurred
 - Exceptional circumstances (i.e. illness, recent job loss)
 - How applicant learned about the program
- Cost analysis
 - Cost/benefit analysis for utilities should be conducted

Tracking and reporting con't

- Who is accessing LEAP?
 - Detailed household information (family size and composition, income source, annual income level, gender, age, housing tenure, race/ethnicity, first language spoken, comfort level speaking and reading English, disability status, years of residency in Ontario, citizenship status, highest level of education completed, primary fuel type used for heating, energy consumption characteristics, annual energy costs)
 - Need to understand who is accessing LEAP and who isn't
 - Help build a picture of energy poverty in Ontario

Tracking and reporting con't

- The LEAP should be evaluated on an annual basis. However, the metrics should study both the short and long-term impacts of the program.
- Monthly metrics to track (can be reported on less than monthly basis so long as they are monthly data).
- For each metric, data should be reported for: (1) total residential accounts (R); and (2) for residential accounts having received LEAP within last twelve months (LI).
- Specific references to “low-income” below are references to customers who had received LEAP in previous two years.
- All references are to residential accounts.

Tracking and reporting con't

- **Question to track: Do people maintain service after receiving LEAP grant?**
- **Metrics to track:**
 - Number of service disconnections for nonpayment (R and LI).
 - Number of service reconnections after disconnection (R and LI).
 - Number of total shutoff notices issued (by type of notice if different) (R and LI).
 - Number of “final” shutoff notices issued (R and LI).
 - Number of customers entering heating season without service (R and LI).

Tracking and reporting con't

- **Question to track: Do customers have the ability to stay out of payment trouble?**
- **Metrics to track:**
 - Number of accounts in arrears (R and LI)
 - Number of LEAP recipients who had also received LEAP: (1) in previous year; and (2) in more than one of previous three years (two separate metrics)
 - Number of LEAP recipient accounts that still have \$0 arrears after (3, 6, 12 months after receiving LEAP assistance) (three separate metrics).

Tracking and reporting con't

- **Question to track: Do customers successfully retire their arrears?**
- **Metrics to track:**
 - Number of accounts in arrears on payment plans (R and LI)
 - Dollars of arrears on payment plans (R and LI).
 - Number of “new” payment plans (R and LI).
 - Number of “completed” (or “successful”) payment plans (R and LI).
 - Number of defaulted payment plans (R and LI).
 - Number of accounts for whom LEAP payment completely retires arrears.
 - Dollars of account balance remaining after application of LEAP payment.

Tracking and reporting con't

- **Question to track: Do LEAP customers generate good payment behaviors?**
- **Metrics to track:**
 - Payment coverage ratio (payments / bills) monthly (R and LI).
 - Payment coverage ratio (payments / bills) year-to-date cumulative (R and LI).

Tracking and reporting

- **Question to track: Do LEAP customers make payments without prompting?**
- **Metrics to track:**
 - Total number of residential collection actions exerted (R and LI).
 - Total number of residential new security deposits posted (R and LI).
 - Total number of residential security deposits held (R and LI).
 - Total dollars of residential security deposits held (R and LI).
 - Total number of residential security deposits applied against arrears (R and LI).
 - Total dollars of residential security deposits applied against arrears (R and LI).
 - Total number of accounts with balance remaining after deposit applied (R and LI).

Tracking and reporting con't

- **Question to track: Baseline data**
- **Metrics to report:**
 - Number of bills rendered this month (R and LI).
 - Number of payments received this month (R and LI).
 - Dollars of bills rendered this month (R and LI).
 - Dollars of payments received this month (R and LI).
 - Number of accounts receiving LEAP payments.
 - Dollars of LEAP payments received.

Tracking and reporting con't

- **Question to track: Is LEAP funding sufficient to meet the demand for LEAP funds?**
- **Metrics to track (by LEAP administering agency):**
 - Number of accounts for which LEAP insufficient to cover entire arrears.
 - Number of customers on waiting list for LEAP benefits.
 - Number of accounts refused assistance due to lack of funds.

Tracking and reporting con't

Roles and responsibilities

Role of coordinating and administrative body:

- creation and maintenance of data base
- establishing mechanisms and processes to ensure data is being properly collected
- creation of training tools to ensure social service providers are properly trained
- supporting service delivery agents with data collection
- data analysis
- releasing an annual report documenting the impact of the program, areas of concern and future priorities. The report should be submitted to the OEB and opportunity should be provided for public review and comment

Tracking and reporting con't

- **Role of social service agencies:**
 - thorough data collection to a high standard
 - staff training and support
 - critically important to have “buy-in” from social service agencies regarding importance of data collection and input

Tracking and reporting con't

Role of utilities:

- Data collection and submission

Tracking and reporting con't

Role of advisory board:

- Consider analyzed data and make strategic recommendations

Funding

- The allocation and management of funding for the program should be effective, efficient and sufficient.
- Lead agencies should have experience disbursing funds.
- Satellite offices should not be involved in the management of the funding or issuing of cheques.
- Any funds remaining at the end of the fiscal year should be “rolled over” into the following year’s budget.

Funding con't

Roles and responsibilities:

- **OEB:** OEB is responsible for an annual audit of the program.
- **Utilities:** Utilities/retailers are responsible for: dispersing funds to lead social service agency (or possibly central coordinating and administrative body), receiving and reviewing financial reports, collecting and submitting data.
- **Lead social service agencies:** Lead agencies are responsible for: receiving funds, disbursing funds to satellites, issuing cheques to utility, managing program funds, completing and submitting annual financial reports to utility. (This role could possibly be filled by central coordinating and administrative body.)

Long-term coordination and administration

- Requirements:
 - Representative advisory body
 - A single coordinating and administrative body with dedicated staff resources and relevant expertise (identified through an RFP process)

Long-term administration and coordination

- Utilities:
 - Utilities play a relatively small role in the oversight and administration of LEAP, other than collecting revenue, posting benefits, and reporting data.
- OEB:
 - OEB should not be the administrative entity. It lacks the expertise to do so.
 - OEB is the “board of directors”, the policy-maker taking advice and direction from the advisory board.
 - OEB role is also financial, ensuring cost recovery by utilities.
 - OEB responsible for program financial auditing.

Long-term coordination and administration con't

- Representative advisory body:
 - representatives of the utilities, including a representative of a small utility
 - social service delivery agents
 - low-income program participants
 - low income advocacy group (without a direct stake in LEAP)
 - environmental/energy conservation advocacy group (without a direct stake in LEAP)
 - delivery agents of conservation programs
- Coordinating and administrative body:
 - Dedicated staff that provides the following resources and expertise: organizational management and coordination, database management and support, database analysis, research & analysis, communications and organizational administration.

Long-term coordination and administration con't

- The role of the coordinating and administrative body is to support the mandate of LEAP by:
 - promoting LEAP
 - supporting service delivery (by providing support to program partners including utilities and social service agencies)
 - ensuring program integrity (including database management and analysis and program evaluation)
 - supporting the advisory board and the OEB with the creation, implementation and evaluation of strategic plans

Long-term coordination and administration con't

- Budget oversight and administration.
 - Allocation of budget between agencies.
 - Utilization of budget (for example, how much has been committed, how much is left in Fiscal Year; how much goes to arrears; does any go to usage reduction).
 - Are costs diverging from budgeted or projected costs (up or down) and why.
- Programs operations:
 - Is the program adhering to all elements of the program “logic” throughout its operation?
 - Is the program developing a problem resolution process that maintains the integrity of the original program design while recognizing the need for responsiveness and flexibility?
 - Is the program appropriately responding to operational problems, in that problems are seen as start-up bugs, program design flaws, program tactic flaws, or program implementation flaws.
 - Responsible for overseeing program-wide staffing. Are staff skills matching program needs? Does the structure of staff resources match program task needs? Does the level of staff resources match program needs by task need or geographic areas? etc.
 - Responsible for staff training. Must ensure that training is timely, effective, comprehensive and understandable staff training?
 - Responsible for problem resolution. Must be able to identify operational problems; address and resolve operational problems; and document problem resolution.
 - Responsible for procedures. Must be able to define and document procedures; communicate procedures to line staff; and ensure that program procedures are adhered to.
 - Responsible for ensuring overall management control. Must be able to ensure that local staff understand and carry out its responsibilities and conform to the program design?
- Spokesperson:
 - Charged with being “spokesperson” for the program before the OEB.
 - Charged with being spokesperson for the program in any official forum (legislative, regulatory, executive).
 - Charged with primary responsibility of developing cross-cutting program operations with related but different public and private programs.