

IN THE MATTER OF section 25.20 and 25.21 of the *Electricity Act*, 1998;

AND IN THE MATTER OF a Submission by the Ontario Power Authority to the Ontario Energy Board for the review of its proposed expenditure and revenue requirements and the fees which it proposes to charge for the year 2011.

LIEN'S WRITTEN SUBMISSIONS ON DRAFT ISSUES LIST

We are counsel to the Low-Income Energy Network (LIEN). We will be making submissions at Issues Day on December 17, 2010.

For the most part, we agree with the issues provided in the Draft Issues List. The purpose of our submissions is to ask the Ontario Energy Board (Board) to confirm our understanding of the issues, and, if necessary, to seek amendments to the Issues List, to ensure that low-income considerations can be addressed.

It is our view that the low-income component of Ontario Power Authority (OPA) efforts is included in Issues 1, 2, 4, 5, 6 and 7. In particular this will be part of the assessment of whether the OPA budget and initiatives are reasonable and appropriate as referenced in the sub issues under 1, 2, 4, 5, 6 and 7.

If the low-income component is not contemplated under or included in all of these issues, we seek amendment of the Issues List to include the low-income component as a discrete matter.

At least five sources support our view: First, on October 6, 2005, the Minister directed the OPA to assume responsibility for its "Low-Income CDM Initiative".

Second, the Conservation and Demand Management Code for Electricity Distributors (the "CDM Code") provides the opportunity for a distributor to meet a portion of its CDM Targets through the delivery of CDM Programs targeted to low-income customers (Article 3.3.1). However, before seeking approval for a distributor's own low-income program, a Board-Approved program, the LDC must coordinate with the OPA by reviewing the existing OPA-Contracted Province-Wide programs (Article 2.3.1) and must not apply for Board-Approved programs that duplicate existing OPA-Contracted Province-Wide programs (Article 2.3.2). There are additional provisions in the CDM Code that relate to the nature and approvals requirements for low-income Board-Approved programs.

Third, the Minister's Directive to the OPA of July 5, 2010, directed the OPA to commence the design, implementation and funding of an electricity CDM program for low-income residential consumers as part of its suite of OPA-Contracted Province-Wide CDM Programs for the 2011-2014 period. In the fall of 2010, the OPA is to report to the Minister on its recommendations and proposed implementation plan.

Fourth, the OPA 2011-2013 Business Plan, dated October 2010, at page 5, indicates that OPA, in 2011, intends to spend 3% of its conservation budget on distributor low-income programs. Further, in 2011, the OPA intends to direct 16% of its total budget for administration to conservation.

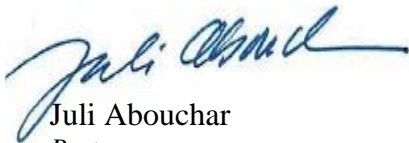
Fifth, the OPA makes reference to its funding of low-income programs in both its 2009 Annual Report and the evidence provided in its 2011 Revenue Requirement Submission, dated November 2, 2010.

We support GEC's request that Strategic Objective 2 be revised to include reference to efforts pursuant to the Directives, not just the integrated plan and its subsequent iterations.

LIEN is representing the interests of all of its member organizations, and in particular, the interests of Social Housing Services Corporation (SHSC), a long-standing member of LIEN and an organization which represents about 600,000 low-income individuals and a quarter of a million low-income homes.

LIEN will be prepared to speak to these submissions on December 17, 2010 and provide further information or submissions in response to any questions the Board may have.

Respectfully submitted,



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cc client
 intervenors

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