

January 10, 2011



Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, Suite 2700
Toronto, Ontario M4P 1E4

Dear Ms. Walli:

**RE: Consultation on Regulated Price Plan Time-of-Use Pricing
Board File No.: EB-2010-0364**

I am writing to you on behalf of the members of the Ontario Non-Profit Housing Association (ONPHA) regarding the OEB's consultation on Regulated Price Plan Time-of-Use (TOU) pricing.

The Ontario Non-Profit Housing Association (ONPHA) represents 760 non-profit housing providers in 220 communities across Ontario. Our members operate more than 160,000 non-profit housing units and provide housing for approximately 400,000 people such as seniors, low-income families with children, Aboriginal people, the working poor, victims of violence and abuse, people living with developmental disabilities, mental illness, HIV/AIDS or addictions and the formerly homeless/hard-to-house.

While TOU pricing will allow the usage and cost of electricity to be more closely measured and billed accordingly, our members have concerns about the impact of this change in electricity pricing on low income tenants in social housing and the housing providers themselves .

There are significant differences between social housing tenancies and those found in the private market. A majority of tenants residing in social housing units have very low or fixed incomes and are often unable to adequately cope with increased costs of day-to-day necessities like electricity. Providers of social housing are also significantly different from private market landlords because of their benchmarked funding structure and additional legislative obligations.

Many of ONPHA's housing provider members have told us that their electricity costs have increased under the TOU pricing plan compared to the previous tiered pricing plan. Others not as yet under TOU are concerned that, given their current prescribed legislated funding structure, their migration to TOU pricing will have a negative financial impact on their ongoing ability to provide affordable housing to low-income people.



Although low income households are specifically identified and targeted by the OEB for other energy efficiency programs, the OEB's consultant's report "*Assessing Ontario's Regulated Price Plan*" presented on December 21, 2010, did not specifically examine or report on the potential impact of TOU pricing on low-income households in any of its case studies. As a result, the necessity of electricity rebates or price protection programs for low-income households or non-profit housing landlords were never contemplated. Electricity price protection programs for low-income households are common in many areas of the United States that are on TOU.

ONPHA strongly recommends that the OEB examine the potential impact of TOU pricing on low income tenants and social housing providers during its assessment and redesign of its regulated price plan. The OEB should also consider the implementation of electricity rebates or price protection programs for low-income households and non-profit housing providers to mitigate the potential negative financial impacts of TOU.

Thank you for the opportunity to present our comments.

Sincerely,

Sharad Kerur
Executive Director
ONTARIO NON-PROFIT HOUSING ASSOCIATION