



Low-Income Energy Network

c/o Advocacy Centre for Tenants Ontario
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February 13, 2012

Ms. 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 Proposed Electricity Reporting and Recording Keeping Requirements for Distributors Related to Revised Customer Service Rules (Board File: EB-2007-0722)

I am writing on behalf of the Low-income Energy Network ("LIEN"), a province-wide organization of more than 80 member groups that acts on issues that are of concern to low-income energy consumers. LIEN welcomes this opportunity to comment on the above-mentioned proposed requirements.

Arrears and Arrears Payment Agreements

LIEN recommends that the electricity local distribution companies ("LDCs") be required to report on:

- average and median dollar amount of arrears owing for low-income customer accounts in arrears at year end (as well as the total dollar amount), and
- average and median amount of monies owing under arrears payment agreements entered into during the course of the year with low-income customers (as well as the total dollar amount).

The amount of arrears owing is information that must be provided at the time of the low-income consumer's initial application with social agency partners for the LEAP Emergency Financial Assistance (EFA) program.

This information will be essential in assessing whether the current maximum LEAP EFA grant of \$500 or \$600 is adequate to meet the needs of low-income customers or needs to be reviewed.

LIEN also recommends that the LDCs, in addition to reporting on the number of arrears payment agreements entered in during the course of the year with low-income customers, be required to break down that information by the length of the agreements, i.e. the number of arrears payment agreements for a period of at least 8 months, at least 12 months and at least 16 months. This detailed information should be required under proposed RRR sections 2.1.8 (vi), (viii) and (x).

The Board has indicated that it has an interest in examining whether agreement completion rates vary by the length of the arrears agreement in a future evaluation of arrears agreements. LIEN believes it is preferable to undertake this examination sooner rather than later as we have learned from eligible low-income customers that their LDC has denied access to payment agreements longer than 10 months. As a result, those customers are put unnecessarily at risk of defaulting on their arrears payments.

Bad Debts

LIEN recommends that the LDCs be required to report on the average and median bad debt expense for low-income customer accounts during the course of the year.

Second or further Arrears Repayment Agreement

Eligible low-income customers who successfully complete an arrears repayment agreement can request a new agreement anytime needed thereafter (as per DSC section 2.7.5.1).

LIEN recommends that LDCs report on the number of eligible low-income customers who have accessed arrears payment agreements more than once.

Service charges and late payment fees

LIEN recommends that LDCs be required to report on the number of eligible low-income customers for whom late payment charges have been waived as a result of entering into a low-income arrears agreement.

We also recommend that LDCs be required to report on the number of low-income customers who have been granted a waiver of service charges related to collection, disconnection, non-payment and/or load control devices.

Security Deposits

LIEN recommends that LDCs be required to report on the average and median dollar amount of security deposits from eligible low-income customers. In addition, we recommend that the LDCs report on the number of security deposit waivers and the number of security deposit refunds provided for eligible low-income consumers.

Thank you for your consideration of our recommendations and comments.

LIEN looks forward to working with the OEB and other stakeholders on assessing the actual results and experience under the revised Customer Service Rules. We are pleased to see that the Board is asking LDCs to file available baseline data for 2010 and 2011 with respect to the various measures to be tracked under the proposed Electricity RRR amendments.

Our LIEN steering committee members involved with direct service with low-income energy consumers have already identified areas for improvement and will be sharing their findings and suggestions with the Board. We believe it is prudent to begin to resolve problems now instead of waiting for a couple years in order to fully realize the benefits of the targeted low-income customer service measures.

Sincerely,

Original signed by,

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Coordinator
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