



# Low-Income Energy Network

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Sent by courier and through the Board's web portal

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

July 20, 2012

**Re: Eligible Low-Income Customer Service Policy Amendments to the Gas Distribution Access Rule EB-2010-0280**

Dear Ms. Walli:

The Low-Income Energy Network (LIEN) represents 90 member groups across Ontario. As a network representing the intersection of interests related to low-income consumers and energy and sustainability, LIEN's focus is on reducing the energy bills of all low-income consumers and providing low-income consumers the opportunity to better manage their energy bills. This helps to ensure that all low-income consumers across Ontario have access to conservation programs, technologies and services as well as conservation education, and realize the environmental, energy and economic benefits associated with the more efficient use of energy.

**Approach to low-income customer service standards for natural gas distributors**

LIEN is supportive of a less prescriptive approach provided that:

- Customer service standards are fair and enforceable
- There is consistency in standards across the regulated gas distributors, where appropriate, to ensure a reasonable balance between level of service needed and costs to provide this service
- There are appropriate metrics and reporting in place to track regulated distributor performance regarding the adherence to the standards. Consultation with stakeholders on the metrics and reporting is recommended
- Regulated gas distributors are required to include consultation with stakeholders as part of any low-income policy revision process, if an additional low-income policy component is put in place in the distributor's Customer Service Policy. LIEN suggests that the Policy be reviewed every two years.

LIEN concurs with the Board's proposed amendments to GDAR.

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**c/o Advocacy Centre for Tenants Ontario (ACTO)**  
425 Adelaide St. West, 5<sup>th</sup> floor, Toronto, ON M5V 3C1  
Phone: 416-597-5855 ext. 5167 1-866-245-4182 Fax: 416-597-5821

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LIEN notes that each utility will have a dispute resolution process for addressing matters and the Board has a customer complaint process to address matters that are not resolved in the dispute resolution process of the rate-regulated utility. LIEN will be encouraging its social service agency members to use these processes when it is doing negotiations for security deposits, arrears repayment plans and other matters on behalf of its low-income clients.

LIEN concurs with the Board that the consultation process has lead to valuable clarifications and improvements to the customer service policies of the gas distributors. LIEN appreciates the participation of the non-rated regulated gas distributors and the improvements they have committed to make to their customer service policies.

LIEN notes that the demonstration of the value of the less prescriptive approach adopted by the Board will be in the implementation of the changes the gas distributors have committed to make to their low-income customer service policies, effective January 1, 2013. In order to demonstrate the value of this approach, the results will need to be measured over time. Therefore, LIEN is very supportive of the Board's upcoming consultation on customer service monitoring and reporting requirements.

The Board intends to review the customer service policies of rate-regulated gas distributors to assess whether they are consistent with the expectations of the Board. LIEN hopes that the Board will continue to engage stakeholders in this review process.

Sincerely,



Zee Bhanji  
Coordinator  
Low-Income Energy Network (LIEN)  
c/o Advocacy Centre for Tenants Ontario (ACTO)  
425 Adelaide St. West, 5th floor  
Toronto, ON M5V 3C1  
Tel: 416-597-5855 ext. 5167  
Toll-free: 1-866-245-4182 ext. 5167  
Fax: 416-597-5821  
Email: [bhanjiz@lao.on.ca](mailto:bhanjiz@lao.on.ca)  
Website: [www.lowincomeenergy.ca](http://www.lowincomeenergy.ca)