



Green Light on a Better Environment (GLOBE) Inc.

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Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
27<sup>th</sup> Floor  
2300 Yonge Street  
Toronto, ON M4P 1E4

**RE: Green Light for a Better Environment Request to Make a Presentation  
Regarding Low-income Issues: Board File No: EB -2008-0150**

Dear Ms. Walli,

I am writing on behalf of Green Light on a Better Environment (GLOBE) Inc. to request the opportunity to make a presentation during the stakeholder conference commencing on September 22, 2008.

Our presentation is expected to cover the following subjects:

- **Question 1 – What should be the objectives of the policies, programs or other measures designed to assist low-income energy consumers, particularly social housing residents?** GLOBE will present its approach to providing services to social housing residents. This is a focus on education based on the philosophy of “helping individuals to help themselves”. Providing education and the tools to effect change empowers individuals to take action and provides long-term solutions to problems. Providing education and tools such as opportunities for effective participation in DSM/CDM is necessary to upgrade appliances, lighting, heating and building envelope and is the first type of assistance to provide. This will enable social housing residents to have some control over their energy bills.

It is important to offer social housing providers the appropriate type of DSM/CDM programs so that they can make the necessary changes to the building envelope and equipment in order to increase the energy efficiency of the buildings they manage. Social housing providers do not have the capital to perform energy retrofits. As a result, they need DSM/CDM programs that provide some capital upfront, which they can leverage.

Similarly, low-income consumers do not have the dollars to invest in energy efficiency. Therefore, GLOBE supports the current approach to low-income DSM/CDM, which provides for energy conservation measures and their installation free of charge for low-income utility customers. These types of DSM/CDM programs should be extended to social housing providers so that they can make these free measures available to their tenants who do not pay their utility bills directly. This will ensure more equitable treatment of all social housing tenants and recognize the financial constraints facing social housing providers.

Providing education and tools may not be sufficient assistance for low-income consumers. Other customer care assistance may be necessary to help residents in social housing that pay their energy bills directly such as financial counselling, arrearage management, adjustments to disconnection and reconnection rules, emergency assistance and bill subsidies to help residents of social housing stay connected.

In discussing this question, we will describe GLOBE's education efforts in social housing in Ontario, with a focus on its Community Champion program. We will indicate how we have worked with utilities, the OPA and other organizations in the past and how utilities could work with us in the future. We will touch briefly on criteria for defining low-income energy consumers that live in social housing. We believe that all residents of social housing are vulnerable consumers and therefore, should be treated as low-income consumers.

- **Question 9 - Are there sufficient conservation education programs available or low-income energy consumers?** GLOBE believes that there should be additional efforts placed in this area to deal with language, literacy and cultural barriers, and to facilitate low-income consumers' access to DSM/CDM programs and other utility services to help them.
- **Question 12 (new question) – Should there be special consideration for residents of social housing regarding time of use pricing?** Due to the inability of housing providers to absorb the additional costs of peak period electricity pricing in bulk metered buildings, and the lack of incentive for residents who do not pay for their electricity to shift load away from peak times, it is likely that a model of individual metering will begin to prevail in social housing. The burden of paying electricity bills will fall to residents, putting them at risk for 'energy poverty', a situation in which a household is unable to afford heating and electrical services essential for survival. In this case, residents of social housing will have the incentive to shift load away from peak periods, however, they are often more inclined to, or have no choice but to use electricity in peak periods. This will mean that their utility bills will rise when they get their smart meter and time of use pricing takes effect. For example, social housing residents have higher electrical loads in winter (for heating) when there are 7 peak hours

per day under the new time of use pricing scheme, and lower electrical loads during summer (in the absence of air conditioning equipment) when there are only 6 peak hours per day. As there are currently no federal assistance programs addressing energy poverty and existing assistance and subsidies do not address the potential adverse impacts of time of use pricing, the OEB should consider recommending to the province that it provide an energy subsidy for low-income consumers in this situation.

GLOBE has learned that the proceeding starting on September 22<sup>nd</sup> may run 3 days and is concerned that the 40 hours provided by the Board for effective participation will be inadequate in this circumstance. As well, if the proceeding is to be transcribed and Board members are to attend, this places an additional level of rigour and preparation required by those making a presentation. Please advise on whether the Board will make additional funded hours available for participants.

Yours truly,



Lindsey Reed  
CEO