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December 8, 2023

Registrar  
Ontario Energy Board  
2300 Yonge Street, 27th floor  
Toronto, ON M4P 1E4

**Re: Ontario Energy Board Staff Report - Low Income Energy Assistance Program Emergency Financial Assistance Review - OEB File No. EB-2023-0135**

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Toronto Hydro-Electric System Limited (“Toronto Hydro”) is the local electricity distribution company for the City of Toronto. It serves over 790,000 customers and delivers about 18% of the electricity used in Ontario.

On November 21, 2023, the Ontario Energy Board (“OEB”) issued a Staff Report reviewing the Low Income Energy Assistance Program (“LEAP”), intended to consider possible improvements and updates to the program’s funding mechanism, eligibility criteria, grant amounts as well as performance metrics and overall program effectiveness. As part of the review, the OEB has put forward a number of recommendations to the program framework, inviting stakeholder feedback.

Toronto Hydro notes that the OEB’s proposed changes are very reflective of the positions put forward by stakeholders at the OEB’s recent Financial Assistance Working Group meeting. For its part, Toronto Hydro is highly supportive of the proposed changes, and submits that revisions to the LEAP program to update eligibility and grant parameters and also offer additional flexibility in program delivery will be helpful in improving both program efficiency and availability of funding to customers in need of assistance.

While endorsing the proposals set out in the OEB’s Report, Toronto Hydro offers the following additional comments for the OEB’s consideration. Toronto Hydro notes that it has made customized proposals to the delivery of the LEAP program specific to its service territory as part its 2025-2029 Custom Rate Application, including to eligibility parameters, maximum grant amounts, overall funding level, and the

application process.<sup>1</sup> The suggestions below are made strictly on the basis that they would provide improvements to the LEAP program on an ongoing and broad province-wide basis:

- Toronto Hydro agrees with the OEB’s proposal to increase the maximum grant amounts to reflect current updated energy costs, but suggests that any revised maximum should be rounded to the nearest \$50 or \$100, for simplicity in messaging and communication.
- Toronto Hydro suggests that the OEB consider softening, or offering additional flexibility, in terms of the requirement that a LEAP applicant be under an active “threat of disconnection”<sup>2</sup> before being eligible for LEAP assistance. The LEAP program was designed prior to the introduction of the Winter Disconnection Ban, which prohibits disconnections between November 15<sup>th</sup> and April 30<sup>th</sup>. During this period, however, customers may still be at risk of accumulating arrears and undue stress knowing they are facing a potential disconnection after April 30<sup>th</sup>. Being able to offer grants to customers in need of assistance (even if not under immediate “threat of disconnection”) would help keep customers bills current, and avoid the cyclical nature of LEAP grants being issued primarily in the period following the Winter Disconnection Ban.

Toronto Hydro is pleased to continue to work with the OEB and stakeholders in updating the parameters of the LEAP program, and in support of efforts to provide assistance to its most vulnerable customers.

Sincerely,



**Andrew J. Sasso**  
Director, Energy Policy and Government Relations  
Toronto Hydro-Electric System Limited

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<sup>1</sup> EB-2023-0195 – Exhibit 4, Tab 2, Schedule 19

<sup>2</sup> LEAP Manual, Section 3.2.