

the Land, the People, the Future

October 31, 2008

Ontario Energy Board
Attn: Ms. Kirsten Walli, Board Secretary
P.O. Box 2319
2300 Yonge St., 27th Floor
Toronto, ON
M4P 1E4

Dear Ms. Walli,

Subject: EB-2008-0150 - Consultation on Energy Issues Related to Low Income Consumers - Written Comments on Behalf of Nipissing First Nation

Nipissing First Nation (NFN) intended to present information to the OEB and other participants during the week of September 22, 2008 regarding NFN's concerns related to low income energy consumers. Unfortunately, due to unforeseen circumstances, NFN had to withdraw from presenting its information. First Nations and their members face numerous challenges related to energy costs and we appreciate the opportunity to share our perspective with the OEB and the other participants. Please find our submissions below.

The social problems that First Nations face are in large part a legacy of historical policies of displacement and assimilation. These problems include the impact of residential schools and the "60's scoop", which saw many First Nations children taken out of First Nations and placed in non-native homes. The effects of these ordeals and others has resulted in multi-generational trauma that manifests itself in many ways.

The reality today for First Nations communities is **ongoing poverty**, and an **increasing gap** in living conditions with other Canadians, according to the Assembly of First Nations. In Canada, 1 in 4 First Nation children live in poverty versus 1 in 6 for rest of Canada. The United Nations Human Development Index would rank First Nations communities 68th in the world among 174 nations. Canada has dropped from first to eighth due, in part, to the housing and health conditions in First Nations communities

Head Office

36 Semo Road
Garden Village, ON
P2B 3K2

Tel: (705) 753-2050
Fax: (705) 753-0207

Lands Department

Tel: (705) 753-2922
Fax: (705) 753-5762

Public Works

Tel: (705) 753-4167

**Child Welfare
Program**

Tel: (705) 753-2691
Fax: (705) 753-5841

Welfare

Tel: (705) 753-2058
Fax: (705) 753-5841

In Canada, over one third of First Nations households with children are overcrowded (5 to 6 times higher than national average on reserve). First Nations homes are about four times more likely to require major repairs compared to Canadians overall. Currently Nipissing First Nation has a severe shortage of shelter for low income families and single people.

Low income people in Nipissing face increasing energy costs and limited options. Nipissing First Nation members only have access to electricity or wood heat, or in limited circumstances oil furnaces. There is no access to natural gas at NFN. NFN manages its own limited heating subsidy program through the provision of fuelwood to Elders and members with limited incomes. Programs like the United Way's "Winter Warmth Fund" either do not exist in First Nations or there is insufficient access to them.

These pressures, among others, has resulted in vulnerability for our Elders and persons with limited incomes. The need to lower costs makes people susceptible to pressure from energy marketers in particular. Many NFN members have entered into contracts with energy marketers thinking they were going to lower their costs only to see them rise substantially. Lack of understanding about energy pricing and fixed costs results in seniors and others being taken advantage of .

The typical factors that are considered in existing disconnect policies (heating degree days; disabilities; homes in poor condition; attempts at payment; infants residing in the homes) do not fully the desperate reality on many First Nations, particularly in northern Ontario. According to the 2007 First Nations Ontario Regional Health Survey, in some communities, entire families – from toddlers to grandparents – suffer from diabetes. In addition, the Regional Health Survey revealed that the average age of diagnosis among youth is now 11 years old. The poor housing conditions include backlogs and overcrowding, substandard conditions of existing units, unsafe units requiring replacement, and necessary mold remediation. And a growing population means infants are likely residing in the homes.

Conservation programs have been very well received at NFN. Our members have participated in incentive programs, the "*Cool Savings Rebate*" and "*Great Refrigerator Roundup*" and would like to see expansion of these sorts of programs. NFN has reviewed the correspondence of other parties and appreciates their support for expanding customer care policies but would like to see more information on how they propose to carry out this important work.

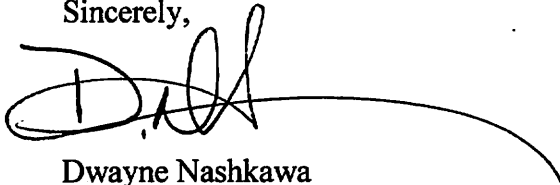
Customer Service Issues (Payment Period, Disconnection Rules, Security Deposits and Specific Service Charges) and Arrears Management Programs are key and must be supported and expanded. A program that considers the unique situations in some northern First Nations should be developed in conjunction with First Nations leadership. This will take considerable discussion with First Nations across the province.

No option should be left out of the discussion and a broader range of consultation is required, particularly in northern Ontario and with First Nations. To date, most First Nations are not even aware of this discussion - this needs to change.

Further, efforts by distribution companies to position this strictly as a government policy issue, is short sighted and would result in many options to address this the needs of low income energy consumers being left out of the discussion. NFN offers these perspectives to demonstrate the need to consider more fully the needs of low income energy consumers and a much fuller discussion on the issue. These issues require the support, participation and cooperation of all involved. Therefore they should be considered through a proper consultation process.

Thank you for the opportunity to provide our views and an individual First Nation perspective.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Nashkawa', with a long horizontal flourish extending to the right.

Dwayne Nashkawa
Executive Director
Nipissing First Nation