



# Low-Income Energy Network

C/o Advocacy Centre for Tenants Ontario  
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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

**Re: Proposed low-income customer service amendments to the gas distribution access rule EB-2010-0280**

Dear Ms. Walli:

The Low-Income Energy Network (LIEN) represents more than 80 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.

The focus of the remainder of LIEN's comments will be on making recommendations regarding needed additional harmonization of low-income policies and practices of the regulated gas distributors pursuant to Appendix A.

## **Appendix A**

### **1. Definition of Eligible Low-Income Customer**

LIEN recommends that in addition to encouraging customers to contact social services or government agencies for assistance, the distributors, as a matter of policy, should encourage customers to take advantage of their residential DSM programs, and advise on the existence of the low-income programs.

### **2. Security Deposits**

LIEN recommends that, consistent with Union's policy, the distributors, on a case by case basis, may offer to reduce the amount of a security deposit required or to waive the security deposit based on individual customer's circumstances.

### **3. Correction of Billing Errors**

LIEN recommends that, consistent with Enbridge's policy, the distributors use a time frame of up to 2 years for billing adjustments due to under billing, except in cases of theft or illegal acts of the customer.

LIEN also recommends that, consistent with Union's proposed policy, the distributors include a message on bills with a significant adjustment to inform customers to contact the distributor for options available.

### **4. Equal Payment and Equal Billing Plans**

LIEN supports the distributors' proposals with the additional requirement that customers be able to access equal billing plans at any time during the year. LIEN understands from certain of its members in the field that customers may have to wait until the fall to access equal billing plans. For example, Enbridge has indicated in an email sent to a customer in March 2011 that "we are unable to set up budget billing at this time of year. She will be able to go on the plan in September regardless of her account balance."

#### **5a. Disconnection Period**

It is not clear whether Union's proposed extension policy applies to a registered charity, government agency, social service agency or a third party that notifies Union that an assessment or arrangement for payment is in process. The extension should apply to all of these organizations, consistent with Enbridge's proposed policy.

The proposed length of the extension is 21 days. LIEN notes that the Winter Warmth program provided a 30 day extension to a customer who sought the assistance of a social service agency in resolving arrears. LIEN is of the view that a 30 day time frame will reduce the need for arrears management plans as it will provide the customer with additional time to find alternative resources.

## **5b. Assistance Information before Disconnection**

LIEN recommends that, consistent with Enbridge's proposed policy, the distributors will notify the customer that the distributor will work with the customer to arrange a suitable payment arrangement based on the customer's circumstances.

## **6a. Down-Payment**

LIEN supports the distributors' proposals.

## **6b. Repayment Time Periods**

LIEN supports the distributors' proposals. LIEN recommends that the gas distributors send a letter by mail to all customers defaulting on arrears management plans, advising of an immediate date that the payment can still be made and a final date when disconnection will occur after the payment default. LIEN supports a 10 day time period that would begin the date the letter is received by the customer.

## **6c. Service charges and late payment charges**

Consistent with the new Low-Income Code Provisions for Electricity Distributors, LIEN recommends that the Board require the gas distributors to:

- Waive any service charges specifically related to collection, disconnection, and non-payment for eligible low-income customers that have entered into an arrears payment agreement with a distributor for the first time or subsequent to successfully having completed a previous arrears payment agreement
- Not impose further late payment charges on an eligible low-income customer after the customer has entered into an arrears payment agreement in respect of the amount that is the subject of that agreement. However, the distributor is not required to waive any late payment charges that accrue to the date of the arrears agreement

## **6d. Payment defaults**

LIEN supports the distributors' proposals.

**6e. Second or Further Arrears Payment Agreement**

LIEN supports the distributors' proposals.

Thank you for the opportunity to make this submission to the Board.

Sincerely,

A handwritten signature in black ink, appearing to read 'Zeenat Bhanji', written in a cursive style.

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