



COVID-19 Energy Assistance Program (CEAP)

June 16, 2020

Guidance for Utilities
Implementing CEAP

Revised June 22, 2020

Purpose

- To provide OEB staff's guidance/direction on the implementation of the CEAP to utilities:
 - Electricity distributors and unit sub-meter providers implementing the CEAP as set out in Conditions of Licence
 - Gas utilities that are implementing the CEAP

Glossary of Terms (1 of 2)

electricity charges

(a) charges that appear under the sub-headings “Electricity”, “Delivery”, and “Regulatory Charges” as described in Ontario Regulation 275/04 (Information on Invoices to Certain Classes of Consumers of Electricity) made under the Act, and all applicable taxes on those charges;

(b) where applicable, charges prescribed by regulations under section 25.33 of the Electricity Act and all applicable taxes on those charges;

(c) Board-approved specific service charges, including late payment charges, and such other charges and applicable taxes associated with the consumption of electricity as may be required by law to be included on the bill issued to the customer or as may be designated by the Board for the purposes of this definition, but not including security deposits, amounts owed by a customer pursuant to a billing adjustment, or amounts under an arrears payment agreement entered into prior to March 17, 2020; and

(d) any financial assistance provided for under the *Ontario Rebate for Electricity Consumers Act, 2016*

Glossary of Terms (2 of 2)

gas charges

- a) In the case of rate-regulated Gas Utilities all OEB approved charges for the supply, transportation, delivery and storage of natural gas, and similar charges for the non rate-regulated Gas Utilities; and;
- b) for OEB rate-regulated Gas Utilities, and similar charges for non rate-regulated Gas Utilities, all -approved specific service charges, including late payment charges, and such other charges and applicable taxes associated with the consumption of natural gas as may be required by law to be included on the bill issued to the customer, but not including security deposits, amounts owed by a customer pursuant to a billing adjustment, or amounts under an an arrears payment agreement entered into prior to March 17, 2020.

overdue balance / overdue amount

The amount by which the account holder's balance is past due in respect of electricity/gas charges. Amounts that may be on the bill but are not yet past due are not part of the overdue balance.

CEAP

- CEAP is a specific, time-limited program to provide a one-time, on-bill credit to electricity and natural gas consumers who have experienced hardships as a result of the COVID-19 pandemic.
- The program is funded by the government of Ontario (\$9 million).
- By letter dated June 1, 2020, the Minister of Energy, Northern Development and Mines (MENDM) and the Associate Minister of Energy asked for the Ontario Energy Board's (OEB) support implementation of CEAP by utilities.
- Each electricity distributor, unit sub-meter provider (USMP) and gas distributor (including non-rate regulated gas distributors) is provided a maximum in funding allocated to it based on number of residential customers.
 - Electricity Distributors: \$4,888,957.32
 - USMPs: \$340,725.01
 - Gas Distributors: \$3,770,317.67
 - See OEB letter dated June 16, 2020 for your utility's allotted fund
- Utilities **are not allowed to recover any funds** beyond the allocated amount.

Eligibility for CEAP - Electricity

Residential electricity consumers are eligible for CEAP if they meet the following criteria:

1. Consumer must have an account with an electricity distributor or a USMP. **Only the account holder (i.e. the customer) can submit an application for the CEAP credit.**
2. Customer had no overdue amount on his/her electricity bill in respect of electricity charges on March 17, 2020, the date the Provincial Emergency was declared, and the account was not enrolled in an-OEB prescribed arrears payment agreement (APA) or any other payment plans for amounts owing for electricity charges prior to March 17, 2020.
3. As of the day of applying, customer has overdue amounts owing for electricity charges from at least two electricity bills since March 17, 2020.
4. Customer has not received Ontario Electricity Support Program (OESP) or Low-Income Energy Assistance Program (LEAP) grants in 2020.
5. Customer or the customer's spouse / common-law partner (who must share the same address with the customer):
 - Is unemployed at the time of the CEAP application, and;
 - Qualified for the Canada Emergency Response Benefit (CERB) or
 - Received Employment Insurance (EI) after March 17, 2020

Eligibility for CEAP - Gas

- Residential natural gas consumers are eligible for CEAP if they meet the following criteria:
 1. Consumer must have an account with a gas distributor. **Only the account holder (i.e. the customer) can submit an application for the CEAP credit.**
 2. Customer had no overdue amount on his/her gas bill in respect of gas charges on March 17, 2020, the date the Provincial Emergency was declared, and the account was not enrolled in an-OEB prescribed APA or any other payment plans for amounts owing for gas charges prior to March 17, 2020.
 3. As of the day of applying, customer has overdue amounts owing for gas charges from at least two gas bills since March 17, 2020.
 4. Customer has not received LEAP grants in 2020.
 5. Customer or the customer's spouse / common-law partner (who must share the same address with the customer):
 - Is unemployed at the time of the CEAP application, and;
 - Qualified for the Canada Emergency Response Benefit (CERB) or
 - Received Employment Insurance (EI) after March 17, 2020

CEAP Credit Per Customer – Electricity

Each eligible electricity customer would qualify for:

- CEAP credit equal to the amount necessary to settle 50% of total overdue balance of electricity charges or \$115, whichever is less, OR
- CEAP credit equal to the amount necessary to settle 50% of total overdue balance of electricity charges or \$230, whichever is less if customer's home is mainly electrically heated or someone in the customer's home relies on one of the following at-home medical devices as already defined for OESP
 - Kidney Dialysis Machine
 - Mechanical Ventilators (invasive and non-invasive)
 - Oxygen Concentrator
- When calculating the overdue balance for the purpose of determining the credit amount, please note the following amounts should be excluded:
 - Amounts owed by the customer in respect of electricity charges that may be on the bill but are not yet overdue
 - Outstanding or overdue amounts relating to non-electricity charges (e.g. charges related to water)

CEAP Credit Per Customer – Gas

Each eligible **gas customer** would qualify for a CEAP credit equal to:

- Customers in Union Gas Northwest or Northeast rate zones: Amount necessary to settle 50% of **total overdue balance of gas charges** or \$160, whichever is less
- Other gas customers: Amount necessary to settle 50% of total **overdue balance of gas charges** or \$80, whichever is less
- When calculating the overdue balance for the purpose of determining the credit amount, please note the following amounts should be **excluded**:
 - Amounts owed by the customer in respect of gas charges that may be on the bill but are **not yet overdue**
 - Outstanding or overdue amounts relating to **non-gas charges** (e.g. charges related to third party services)

CEAP Application & Timelines (1 of 2)

- Utilities are required to use the OEB prescribed Application Form for the purpose of CEAP
 - The application form captures all the information necessary for assessment of CEAP eligibility
 - Utilities are not required to collect supplemental information or documentation
- The OEB/MENDM developed the Application Form for CEAP (fillable PDFs) which should be made available on each utility's website effective **July 13, 2020**.
 - Customers must be allowed to email or mail the completed application form to the utility.
- Utilities may develop/accept other forms of application submissions including:
 - Online web submission: Adapt the OEB form into a web-based version to host on their own websites and develop e-sign solutions
 - Phone submission: Customer submit the application by phone through the utility's call center. Where a utility accepts applications over the phone, the call must be recorded to document confirmation of all information requested on the Application Form, including consent and the applicant's attestation of eligibility.
- Utilities are required to provide on their website instruction on options for submission, as well as contact information (telephone number and email address) for customer enquires.

CEAP Application & Timelines (2 of 2)

- Complete application to be processed within **10 business days** of receipt regardless of the method of application.
- Complete applications to be processed in the order they are received (i.e. first come, first served) regardless of the method of application.
 - An application should not be considered received until it is complete
- An application is **considered received**:
 - On the date on which it was submitted, if submitted by e-mail, online, or by phone
 - On the date received by the utility, if submitted by mail
- Utilities are not permitted to recover any amount of CEAP funding provided to their customers above the amount allocated to them.
- Utility should communicate on its website when it no longer accepts applications and inform the OEB.

Record Keeping & Reporting

To facilitate potential OEB reviews of the program implementation and potential consumer dispute resolution, utilities must keep the following records for **two years**, and make them available to the OEB upon request:

- All CEAP applications that were accepted as complete and a credit was provided and all CEAP applications that were denied.
 - Where a utility accepts applications over the phone, the call must be recorded to document confirmation of all information requested on the Application Form, including consent and the applicant's attestation of eligibility.
- Any communications with customers about CEAP funding.
- A record of the amount of CEAP funding credited to each successful applicant, as well as the total amount of CEAP funding credited to customers.
- **Utilities are required to report to the OEB, as soon as possible, the date on which its CEAP funding has all been expended.**

Overview of CEAP Application Process

- Step 1: Review CEAP applications for completeness
- Step 2: Verify account related information
 - Application form requires applicants to attest to their eligibility for CEAP. Utilities are expected to verify eligibility information that is available through the customer's account information
- Step 4: Process complete applications for eligible customers & apply credit

Step 1: Review CEAP Applications for Completeness

- Ensure that:
 - Application is signed / name stated in the declaration section
 - Adequate information is provided in the account section for the utility to identify the account
 - Eligibility questions are all answered
- If application is **incomplete**,
 - Contact the applicant and identify the information required to complete the application
 - Use the customer's preferred method of communication, if known, or otherwise by mail or any other means determined to be appropriate by the utility (e.g. phone)
 - Advise the applicant to provide the required information as soon as possible
 - If required information is received after exhaustion of utility's allotted fund, inform the customer that the application can no longer be processed
- Keep application form and copies of all communications with customer.

Step 2: Verify Account Related Information (1 of 5)

1. **Customer had no overdue amount on his/her electricity/gas bill (as applicable) on March 17, 2020, the date the Provincial Emergency was declared**

Ensure the applicant answered this question and verify that:

- Account was current on March 17th – no amount for electricity charges/gas charges (as applicable) was overdue.
 - Customer is eligible if he/she has overdue amounts relating to non-electricity/gas charges (as applicable) such as third party services.
- Account **was not enrolled** in an-OEB prescribed APA or any other payment plans for amounts owing for electricity charges/gas charges (as applicable) **prior to March 17, 2020.**

Step 2: Verify Account Related Information (2 of 5)

2. **As of the day of applying, customer has overdue amounts owing from at least two electricity/gas bills (as applicable) since March 17, 2020.**

Ensure the applicant answered this question and verify that the customer has failed to make **complete** payment on account of electricity charges/gas charges (as applicable) on at least two bills issued since March 17, 2020 and has an overdue balance on the date of their application for CEAP

- If customer made partial payments towards the bill(s), customer is still eligible
- If customer paid all electricity charges/gas charges (as applicable) but had overdue amounts relating only to non-electricity/gas charges as applicable (e.g. third party services), the customer doesn't qualify

Step 2: Verify Account Related Information(3 of 5)

3. The customer (the person whose name is on the bill) or the customer's spouse or common-law partner (who must share the same address with the customer) is unemployed on the date the CEAP application is submitted; and
 - Qualified for the Canada Emergency Response Benefit (CERB) or
 - Received Employment Insurance (EI) after March 17, 2020.
- Ensure applicant's response to the question on the application form indicates that the customer or the customer's spouse or common-law partner is unemployed on the date the CEAP application is submitted; and
 - Qualified for the Canada Emergency Response Benefit (CERB) or
 - Received Employment Insurance (EI) after March 17, 2020.
- **Utility is not expected to verify eligibility or ask for proof.**

Step 2: Verify Account Related Information (4 of 5)

4. Electricity customer has not received Ontario Electricity Support Program (OESP) or Low-Income Energy Assistance Program (LEAP) grants in 2020 . Gas customer has not received LEAP grants in 2020.

- Electricity: Ensure customer has not received OESP or LEAP grants in 2020.
- Gas: Ensure customer has not received LEAP grants in 2020.

5. Customer can only receive CEAP once for electricity and once for gas

Ensure that a CEAP credit was not issued to the customer previously **by the utility**

- The utility is **not expected** to check if the customer received a CEAP credit from another utility

Step 2: Verify Account Related Information (5 of 5)

If the verification review shows that one or more eligibility requirement is not met

- Inform the applicant that application does not qualify for CEAP
 - Use the customer's preferred method of communication, if known, or otherwise by mail or any other means determined to be appropriate by the utility (e.g. phone)
 - Include the following information:
 - Reason(s) for not qualifying
 - Other assistance programs such as LEAP and OESP
- Keep application form and copies of all communications with customer

Step 3: Process Application & Apply Credit (1 of 3)

If application is complete & applicant is eligible

Follow the steps set out in slides 21 & 22, with the following rules in mind:

- Complete application to be processed within **10 business days** of receipt regardless of the method of application
- Applications to be processed in the **order they are received** (i.e. first come, first served) regardless of the method of application
- Utilities are **not permitted to recover any amount** of CEAP funding provided to their customers above the amount allocated to them.

Step 3: Process Application & Apply Credit (2 of 3)

- Inform the applicant that application is accepted for processing
 - Using the customer's preferred method of communication, if known, or otherwise by mail or any other means determined to be appropriate by the utility (e.g. phone)
- Keep the application form and copies of communications with customer, including recordings of phone applications where applicable.
- Apply appropriate credit to the customer's **next bill or the following one** (See table on next slide for credit amounts) to **overdue balances for electricity charges/gas charges only** (as applicable).
- When calculating the overdue balance for the purpose of determining the credit amount, please note the following amounts should be **excluded**:
 - Amounts owed by the customer in respect of electricity charges/gas charges (as applicable) that may be on the bill but are **not yet overdue**
 - Outstanding or overdue amounts relating to **non-electricity charges/gas charges** (e.g. charges related to third party services)
- Track and keep a record of the amount of CEAP credits applied
- **Report to the OEB, as soon as possible, the date on which the utility's CEAP funding has all been expended.**

Step 3: Process Application & Apply Credit (3 of 3)

Electricity CEAP Credit

- CEAP credit equal to the amount necessary to settle 50% of **total overdue balance of electricity charges** or \$115, whichever is less,

OR

- CEAP credit equal to the amount necessary to settle 50% of **total overdue balance of electricity charges** or \$230, whichever is less if customer's home is mainly electrically heated or someone in the customer's home relies on one of the following at-home medical devices:
 - Kidney Dialysis Machine
 - Mechanical Ventilators (invasive and non-invasive)
 - Oxygen Concentrator

Gas CEAP Credit

- Customers in Union Gas Northwest or Northeast rate zones: CEAP credit equal to the amount necessary to settle 50% of **total overdue balance of gas charges** or \$160, whichever is less
- Other gas customers: CEAP credit equal to the amount necessary to settle 50% of total **overdue balance of gas charges** or \$80, whichever is less

CEAP Q & A (1 of 2)

Question

Answer

What is the household income level requirements for CEAP?

Eligibility is not tied to income level.

Can eligible customers apply for both electricity and gas CEAP credit

Yes

If the utility is aware that the customer has more than one residential electricity/gas accounts within its service territory, can the customer receive the CEAP for all accounts if other CEAP eligibility criteria are met?

No. Eligible customers can receive the appropriate CEAP credits only for one account

- **Primary residence where the customer resides for more than 6 months of the year - but no verification is needed. Utility does not have to check or test this.**

Can eligible customers receive the CEAP credit more than once?

No. Eligible customers can receive the CEAP credit only once.

CEAP Q & A (2 of 2)

Question

Answer

How does CEAP work with OESP and LEAP?

Eligibility for CEAP does not impact eligibility for either OESP or LEAP. Eligible low-income customers who receives CEAP can still apply for LEAP and/or OESP if they meet the low-income threshold. However,

- Electricity customers who have received OESP or LEAP in 2020 are not eligible for CEAP
- Gas customers who have received LEAP in 2020 are not eligible for CEAP

Do the OEB's low-income Customer Service Rules (CSR) apply to CEAP eligible customers?

No. The OEB's low-income CSR apply to eligible low-income customers as defined in the Distribution System Code (DSC) and Unit Sub-Metering Code (USMC) for electricity customers and the Gas Distribution Access Rule (GDAR) for gas customers. However, utilities are encouraged to work with all of their customers and find payment solutions that are suitable to the customer's needs.

- DSC defines "eligible low-income customer" as
 - (a) a residential electricity consumer who has been approved by the CSP for the OESP; or
 - (b) a residential electricity consumer who has been approved by a LEAP Intake Agency for Emergency Financial Assistance
- GDAR defines "eligible low-income customer" as a residential gas customer who has been approved by a LEAP Intake Agency for Emergency Financial Assistance