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VIA EMAIL AND RESS

Brian Hewson
Vice-President, Consumer Protection & Industry Performance
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, Ontario
M4P 1E4

Dear Brian Hewson:

**Re: Review of Low-income Energy Assistance Program – Emergency Financial Assistance (LEAP EFA) - EB-2023-0135
Enbridge Gas Inc. (Enbridge Gas) – Written Comments**

On November 21, 2023, the Ontario Energy Board (OEB) issued, for comment, its Low-Income Energy Assistance Program Emergency Financial Assistance Program Review (OEB Staff Report). The OEB Staff Report is based on the OEB's engagement with the Financial Assistance Working Group (FAWG) which was held on July 19, 2023, and was followed by distributors, community agencies and consumer representatives providing their comments on the scope, which included recommendations on the program's funding mechanism, eligibility criteria, grant amounts, program awareness, as well as performance metrics and targets to measure the program effectiveness.

Following are Enbridge Gas's comments on the OEB Staff Report.

Recommendation 4.1 – LEAP EFA Income Eligibility Threshold

Update LEAP EFA income eligibility thresholds to align with the OESP income thresholds that become effective March 1, 2024.

Enbridge Gas Comments

Although Enbridge Gas has no objection to the agencies using the Low-Income Measure (LIM) produced by Statistics Canada for 2020, Enbridge Gas does expect to see an increase in the number of approved applicants and an increase in funds dispersed as a result of this change.

Recommendation 4.2 – Grant Amounts

Grant Amounts: Increase basic electricity and natural gas grant to \$650 and increase grant for those heating with electricity to \$780.

Enbridge Gas Comments

Enbridge Gas has no objection to the natural gas grant increasing from \$500 to \$650, which is being increased to reflect inflation.

Recommendation 4.3 – Program Funding

Distributors should make funding available for all applicants meeting all of the LEAP EFA eligibility criteria – no eligible applicant should be denied due to lack of funding.

Enbridge Gas Comments

Enbridge Gas has no objection to funding being made available to all applicants that meet the eligibility criteria, with no limit on available funding.

Enbridge Gas notes however that the combination of adopting the proposed amended eligibility criteria, amended grant amount, and removal of the limit on available funding could result in a material increase in funding requirements, above those provided by the .12% of revenue formula currently reflected in rates. Enbridge Gas has reviewed its year-end outstanding LEAP funds for the 2016 – 2019 period and has found that for years where the funding was not depleted the total dollars were relatively low and that in 2018 the legacy companies did use all funding that the formula (.12% of revenue) provided for. This indicates that the current funding formula is aligned with existing program parameters and may not be sufficient for the proposed parameters.

In response to such a scenario, OEB Staff notes that distributors can request a higher level of funding as part of Cost of Service rate applications. However, Enbridge Gas is in the latter stages of its 2024 Cost of Service rebasing application, and as such wouldn't be in a position to request a higher level of funding for 5 years, as part of its next Cost of Service rebasing application for 2029. As a result, Enbridge Gas believes it would be appropriate for the OEB to establish a variance account to capture any annual overage in required LEAP funding, as compared to the existing funding formula, which results from amendments to LEAP criteria. The variance account would continue until the next cost of service application, at which point an updated funding amount, reflecting experienced funding requirements resulting from LEAP criteria amendments, could be incorporated into rates. Amounts captured in the variance account would be sought for disposition as part of Enbridge Gas's annual application for the Disposition of Deferral and Variance Account Balances and Review of Utility Earnings proceedings.

Recommendation 4.4 – Sustainability

The Program eligibility should be revised to provide flexibility to agencies to accept other documents in lieu of proof of mortgage/lease (e.g., letter from MPP, attestation from a legal clinic or letter from a landlord).

Enbridge Gas Comments

Enbridge Gas has no objection to providing the agencies with more flexibility to accept other documents.

Recommendations 4.5 – Program Awareness

Distributors and USMPs should undertake regular communication to consumers about LEAP EFA and can work with FAWG and OEB staff on suitable approaches.

Enbridge Gas Comments

Enbridge Gas has no objection to this recommendation. Communication regarding LEAP EFA is embedded in Enbridge Gas's customer communications.

Recommendation 4.6 – Performance Metrics

Outcome: LEAP EFA effectively reaches eligible low-income customers in a timely manner.

Metrics:

- No eligible LEAP EFA application is denied due to lack of funding.
- All LEAP EFA applications are processed within 21 days.

Measurement: Measure performance against the metrics after two years.

Enbridge Gas Comments

Enbridge Gas has no objections to this recommendation.

Enbridge Gas would like further direction from the OEB on how the LEAP Program will be administered in 2024, if the recommendations are adopted. LEAP is a yearly program that runs from January 1 to the end of December. With the proposal to make changes to the program on March 1, 2024, Enbridge Gas is looking for clarification regarding the following situations:

- Would customers who are granted LEAP funding between January 1 and February 29, 2024 be able to apply for additional funding after March 1, 2024? and
- If customers who are applying between January 1 and February 29, 2024, do not meet the income threshold, but would meet the new threshold effective March 1, 2024, is it the OEB's expectation that these be tracked in some way and that those customers be notified to reapply?

Should you have any questions on this matter please contact Lesley Austin (lesley.austin@enbridge.com) or myself.

Sincerely,



Rico Medeiros
Director, Customer Care Operations
Enbridge Gas Inc.

cc: Sophie Rousseau, Advisor, OEB (2023LEAPReview@oeb.ca)