



Via RESS

December 8, 2023

Ontario Energy Board
2300 Yonge Street, 27th floor
P.O. Box 2319
Toronto, ON M4P 1E4

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

Hydro Ottawa Limited (“Hydro Ottawa” or “the Utility”) is a Local Distribution Company (“LDC”) serving approximately 360,000 customers in the City of Ottawa and the Village of Casselman. Hydro Ottawa is committed to delivering value across the customer experience by providing reliable, safe and responsive services to its customers.

Hydro Ottawa appreciates the opportunity to submit feedback on the Ontario Energy Board (“OEB”) Staff Report: Low-Income Energy Assistance Program (“LEAP”) Emergency Financial Assistance (“EFA”). In its Report, OEB Staff outlined six recommendations for LEAP EFA. Hydro Ottawa’s comments related to those recommendations are included herein.

Income Eligibility Threshold

The OEB has recommended that the LEAP EFA income eligibility thresholds be updated to align with the Ontario Electricity Support Program (“OESP”) income thresholds that become effective March 1, 2024.

- Hydro Ottawa is supportive of this change. Hydro Ottawa further recommends that the Ministry and OEB consider updating the income eligibility thresholds on an annual basis for both LEAP and the OESP to reflect current economic pressures on low-income households.

Grant Amounts

The OEB has recommended that the maximum annual grant amount be increased from \$500 to \$650, and from \$600 to \$780 for those heating with electricity.

- Hydro Ottawa is in favour of larger grant amounts being made available to customers.



The OEB introduced Temporary measures as a result of the COVID-19 pandemic. At that time, the OEB provided temporary flexibility to allow maximum grant values to be increased to \$1000 and \$1200 for electrically heated homes. Hydro Ottawa suggests that the OEB considers allowing distributors ongoing flexibility to provide larger grant amounts where appropriate. Distributor size, customer base and geographic and economic factors vary significantly across the province. It should be recognized that some customers in one distribution service territory may have different needs from customers in another distribution service territory. Distributors that are currently in a surplus of LEAP funding should, at their discretion, be able to provide more funding to low income customers.

Program Funding

The OEB has recommended that distributors should make funding available for all applicants meeting all of the LEAP EFA eligibility criteria, and that no applicant should be denied due to lack of funding.

- Hydro Ottawa does not support the recommendation as described above.
- Hydro Ottawa acknowledges that OEB staff conducted analysis and potential cost of implementing this recommendation. However, no analysis was provided on the LDC that varied year to year that ran out of LEAP funds, which represents 54% of LDCs (or 38 out of 70 LDCs). Hydro Ottawa believes that this analysis should show the full potential cost to understand customer implications.
- The Report excluded COVID-19 pandemic impacts in order to understand a normal state implication of this change. Hydro Ottawa acknowledges this is a good approach to understand a normal state. Hydro Ottawa recommends that the OEB provide an analysis on what this recommendation would look like in a non-typical scenario (such as COVID-19). In providing this recommendation, no safeguards were set to protect LDC cash flow or other implications. As a result Hydro Ottawa suggests that the OEB provide analysis that contemplates non-anticipated events that may impact energy consumers.
- Should this recommendation be implemented, Hydro Ottawa suggests that a variance account be established (without materiality consideration). It is not in normal course that LDCs manage low-income funding as part of rate setting. A variance account would support LDCs outside of rebasing applications.
- Communities that require additional funding indicate a community with a higher level of need. Distributors that request further rate funded support require increased funding from the same group that is requesting support. Two potential suggested solutions that would require legislative change that the OEB could engage the Ministry on are:
 - If LDCs have exhausted LEAP funding, the OEB could introduce one time additional funding through the OESP program. If these needs are not one time, it



- could be an indication that the OESP program should be reviewed for potential changes.
- Introduce a program similar to the rural rate protection that funds communities with higher need through a provincial-wide program, rather than through distribution rates. .
- Hydro Ottawa notes that, if grant levels were to differ amongst distributors, the issue of running out of funding could be alleviated or mitigated.

Sustainability

Hydro Ottawa has recommended that program eligibility should be revised to provide flexibility to agencies to accept other documentation in lieu of proof of mortgage/lease (e.g. letter from MPP, attestation from a legal clinic or letter from a landlord).

- Hydro Ottawa supports the proposed changes to ensure the LEAP intake process is efficient and agile. Agencies within Hydro Ottawa’s service territory have provided feedback that customers face challenges providing all the required documentation within the current timeline. Providing flexibility to accept other types of documentation is a good step in streamlining the process.
- Hydro Ottawa continues to recommend exploring the possibility of offering an online application format, similar to that of the OESP application process. Allowing electronic submissions from customers would improve efficiency for agencies. Additionally, electronic submissions provide more flexibility for applicants, particularly those with physical disabilities and/or transportation limitations to get to intake centers in person.

Program Awareness

The OEB has recommended that distributors and Unit Sub-Metering Providers (“USMPs”) should undertake regular communication to consumers about LEAP EFA. Distributors and USMPs can work with the Financial Assistance Working Group (“FAWG”) and OEB staff on suitable approaches.

- Hydro Ottawa supports enhancing communication to actively promote information related to LEAP for customers throughout the province, and is supportive of USMPs providing regular information to customers as well. Hydro Ottawa currently undertakes a great deal of customer communication regarding low-income assistance through various channels.

Program Performance Metrics

The OEB has recommended the implementation of new performance metrics to monitor that LEAP EFA effectively reaches eligible low-income customers in a timely manner.



- In general, Hydro Ottawa has no concerns with the proposed new performance metrics. The recent OEB RRR consultation will give distributors another opportunity to provide feedback on reporting requirements related to LEAP.

Hydro Ottawa appreciates the opportunity to provide feedback on the OEB's recommended changes to the LEAP EFA program, and supports the OEB's efforts in making the LEAP program available and accessible to energy consumers in need. Hydro Ottawa notes that it is a member of the FAWG, and looks forward to continuing to provide feedback through the FAWG on matters related to financial assistance.

Sincerely,

DocuSigned by:
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