

LEAP
Emergency Financial Assistance
Program Manual

February 17, 2012

PURPOSE

The LEAP Emergency Financial Assistance Program Manual (the “LEAP EFA Manual”) was developed by the Ontario Energy Board’s (the “Board” or “OEB”) Financial Assistance Working Group. It is intended to guide the implementation and delivery of the Board’s Low-Income Energy Assistance Program (LEAP). As set out in the *Report of the Board: Low Income Energy Assistance Program*, issued in March 2009, the Board believes that emergency financial assistance for low-income energy consumers should be offered on a consistent basis across the province. In particular, low-income energy consumers should have access to similar services irrespective of where they live and the distributor that serves them. To that end, the Board supports the LEAP EFA Manual as it is consistent with the Board’s policy and principles regarding assistance to low-income energy consumers. The Board encourages all distributors and their social service agency partners to adhere to the LEAP EFA Manual in order to help ensure consistent delivery of LEAP Emergency Financial Assistance (“LEAP EFA”) across Ontario.

ACKNOWLEDGEMENTS

The LEAP EFA Manual was developed by the Financial Assistance Working Group, which was comprised of OEB staff and representatives of the following organizations:

- Consumers Council of Canada
- Coalition of Large Distributors
- Cornerstone Hydro Electric Concepts
- Direct Energy
- Enbridge Gas Distribution
- EnerCare Connections¹
- Housing Help Association of Ontario
- Hydro One Networks Inc.
- Low Income Energy Network
- Ministry of Energy
- Neighbourhood Information Post
- Ontario Power Authority
- Peterborough Distribution Inc.
- Salvation Army Centre of Hope
- Union Gas
- United Way Toronto
- Vulnerable Energy Consumers Coalition / Energy Probe

The LEAP EFA Manual is based on prior work completed by the developers of the Winter Warmth Program Process Manual. Sincere thanks to the following organizations for their prior contributions:

- Enbridge Gas Distribution
- Hydro Ottawa Limited
- Neighbourhood Information Post
- Toronto Hydro-Electric System Limited
- United Way Toronto

¹ On behalf of the Smart Sub-Metering Work Group, which is comprised of Carma Industries Inc., EnerCare Connections, Hydro Connection Inc., Intellimeter Canada Inc., Provident Energy Management Inc., Stratacon Inc., and Wyse Meter Solutions.

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1. PROGRAM OVERVIEW

1.1 What is LEAP?

In 2008, the Ontario Energy Board started a consultation with stakeholders to consider the need for, and nature of, policies that could assist low-income energy consumers. Through that consultation, the OEB identified three components of a “Low-Income Energy Assistance Program” or LEAP, that could assist low-income energy customers better manage their bill payments and energy costs. These components are: (1) emergency financial assistance; (2) customer service rules; and, (3) targeted conservation and demand management programs.

This Manual focuses on the first component of LEAP – Emergency Financial Assistance. For convenience, this term has been referenced as LEAP EFA throughout the Manual.

The delivery of LEAP EFA relies heavily on the cooperation between utilities and social service agencies. It is expected that as agencies screen and assess applicants in need, that they may refer customers not only for LEAP EFA, but also for customer service measures and/or conservation programs.

LEAP EFA is a grant program intended to provide *emergency* relief to eligible low-income customers of utilities and unit sub-metering providers² who may be experiencing difficulty paying current arrears. It is intended to be applied to outstanding utility bill payments, not to security deposit payments due. It is also not intended to provide regular or ongoing bill payment assistance.

LEAP EFA is similar to the Winter Warmth program which many agencies may already be familiar with and/or had experience delivering.

This LEAP EFA Manual³ will serve to guide program implementation. The LEAP EFA Manual defines the eligibility criteria, roles of service agencies and applications processes in order to ensure consistent delivery of LEAP EFA throughout Ontario. In order to accommodate the unique needs of the local service agencies and utilities some aspects of the administration of LEAP EFA has been left to the discretion of those agencies and utilities.

² Unit sub-metering providers are companies licensed by the OEB that install and operate meters in multi-unit buildings, such as apartments or condominiums, where the building is connected to a bulk meter.

³ It is expected that the program rules and processes for LEAP EFA may change over time, and this Manual will be updated accordingly.

1.2 Who offers LEAP EFA?

LEAP EFA is funded by all utility ratepayers through the distribution rates of each utility, although utilities and social agencies may also raise money from private donations to supplement LEAP EFA funding. The funds provided by a particular utility must be used only for that utility's customers, or customers of unit sub-metering providers operating within that utility's service area. Generally, all electricity and natural gas utilities are required by the OEB to make funds available for their eligible low-income customers for LEAP EFA. However, there are some exceptions that are noted below.

There is one electricity utility and two natural gas utilities whose rates are not regulated by the OEB. This means that the OEB cannot require these utilities to offer LEAP EFA to their customers, but the OEB has encouraged them to do so. The electricity utility is Cornwall Street Railway Light and Power Company Limited and the natural gas utilities are Utilities Kingston and Kitchener Utilities.

However, Cornwall Street Railway Light and Power Company Limited, Utilities Kingston and Kitchener Utilities have all confirmed to the Board that they will deliver LEAP EFA.

For 2012, Union Gas Ltd. will continue to deliver the Winter Warmth program year round instead of LEAP EFA. Enbridge Gas Distribution Inc. will continue to offer the Winter Warmth program for the 2012 heating season and will use LEAP EFA funding to offer emergency financial assistance for the remainder of the year.

LEAP EFA is also available to eligible low-income customers of unit sub-metering providers. The funds for these customers come from the electricity utility that serves the area where the applicant lives. Therefore if an applicant provides an electricity bill from a unit sub-metering provider, the agency must inquire as to the relevant electricity utility. This information can be confirmed by phoning the unit sub-metering provider.

A list of suite metering providers is provided in Appendix D.

2. DELIVERING LEAP EFA: Who Does What?

In some communities, LEAP EFA may be delivered by one agency, which has responsibility for all functions. In other communities, it is a network of agencies that are responsible for the basic functions required to deliver the program. These functions essentially break down into two areas: “Intake” functions that work with applicants and “Lead” functions that involve overall program coordination, financial management and reporting. The following sections provide an overview of the roles and responsibilities of the major players in the delivery of LEAP EFA: Intake Agencies, Lead Agencies, Utilities, and Unit Sub-Metering Providers.

2.1 Intake Agencies

Intake Agencies are responsible for the following tasks:

- Screening applicants for eligibility for LEAP EFA, and income eligibility for customer service measures and conservation programs, as appropriate;
- Processing applications including collecting the necessary information (bills, pay stubs, income information), verifying applicant information with the service provider⁴ and completing all required forms;
- Ensuring that all necessary documentation and forms are completed;
- Informing the applicant’s service provider that assessment of eligibility is being undertaken to ensure appropriate action by the service provider, which may include a hold on a scheduled disconnection;
- Reviewing applications and making recommendations to the Lead Agency within the disconnection hold period;
- Communicating information with the applicant regarding approved or denied applications;
- Tracking information and reporting to the Lead Agency to support the Lead Agency’s reporting to utilities;
- Assisting with the gathering of statistics;
- Providing appropriate referrals and follow-up support to applicants; and
- Notifying service providers of final decisions on applications so that service providers can take appropriate action (NOTE: It is at the discretion of the Lead and Intake agencies as to which agency is responsible for this task).

2.2 Lead Agencies

Lead Agencies are responsible for the following tasks:

- Performing intake functions where there is no Intake Agency;
- Selecting or contracting with Intake Agencies to undertake intake functions;

⁴ “Service Provider” means utility or unit sub-metering provider, as appropriate.

- Making final decisions as to whether to approve or deny applications based on recommendations from Intake Agencies;
- Receiving program funds from the utility, and tracking funds appropriately;
- Remitting payment back to the utility on behalf of the applicant as per Intake Agency's recommendations, and ensuring each utility's funds are remitted only for that particular utility's customers or customers of unit sub-metering providers within that utility's service area;
- Developing and implementing an appeals/internal review process;
- Tracking applicant names, addresses and account numbers to prevent duplicate requests;
- Providing utility partner(s) with a list of the Intake Agencies, by geographic area, and updated as required, for the purposes of referrals by utility call centre staff;
- Upon request by a unit sub-metering provider, providing a list of the Intake Agencies operating in the relevant utility service areas, for the purposes of referrals by utility call centre staff;
- Tracking program performance & expenditures and reporting to utility in accordance with timelines and metrics set out in Appendix C;
- Providing oversight of intake agency administration, including training and ongoing support;
- Management of customer files, including negotiating the location of storage and process for transferring files with intake agencies; and
- Notifying service providers of final decisions on applications so that service providers can take appropriate action. (NOTE: It is at the discretion of the Lead and Intake agencies as to which agency is responsible for this task).

2.3 Utilities

Utilities are responsible for the following tasks:

- Collecting money from ratepayers for LEAP EFA in the amount established by the OEB;
- Transferring program funds to Lead Agencies;
- Determining funding allocations within their service territory by geography;
- Establishing partnerships, contracts, and operational procedures with Lead Agencies;
- Receiving, recording and taking appropriate action upon notification from an Intake Agency (or Lead Agency as appropriate) that an assessment of eligibility is being undertaken;
- Receiving, recording and taking appropriate action upon notification from an Intake Agency (or Lead Agency as appropriate) of decisions on applications;
- Training call centre and collections staff on LEAP EFA, customer service rules, and conservation programs;
- Confirming customer and account information used in determining program eligibility, including information on payment history; and
- Reporting to the OEB in accordance with OEB reporting requirements.

2.4 Unit Sub-Metering Providers

Unit sub-metering providers are responsible for the following tasks:

- Training call centre and collections staff on LEAP EFA and customer service rules;
- Confirming customer and account information used in determining program eligibility, including information on payment history;
- Receiving, recording and taking appropriate action upon notification from an Intake Agency (or Lead Agency as appropriate) that an assessment of eligibility is being undertaken; and
- Receiving, recording and taking appropriate action upon notification from an Intake Agency (or Lead Agency as appropriate) of decisions on applications.

3. LOW-INCOME ELECTRICITY CUSTOMER SERVICE RULES

In 2010 and 2011, the OEB introduced new electricity customer service rules for all residential customers. The customer service rules are contained in amendments to the Distribution System Code, Retail Settlement Code and Standard Supply Service Code. A summary of the residential electricity customer service rules is provided in Appendix E.

On October 1, 2011, new customer service rules for eligible low-income electricity customers came into affect. Details on the low-income customer service rules and how to qualify for them are provided below⁵. The rules should be read in context of the customer service rules applied to all residential electricity customers as summarized in Appendix E.

The summary of the low-income electricity customer service rules set out below is a synopsis and is not intended, nor should it be used as an interpretive tool for the Code amendments for any purpose, or in any forum. The summary is a narrative and informal description of the various amendments made to the Codes and it has no legal or regulatory role in its interpretation, implementation or enforcement.

3.1 Who is Eligible?

Eligible low-income electricity customers are residential customers who have a pre-tax household income at or below Statistics Canada's most recent pre-tax Low Income Cut-Off plus 15%, taking into account family and community size.

A customer must be qualified by a Social Service or Government Agency that:

- i) partners with a local electricity utility to assess eligibility for Emergency Financial Assistance; or
- ii) assesses eligibility for other energy financial assistance or low-income financial assistance programs, and partners with a local utility to qualify customers for eligibility.

A customer who is qualified for LEAP-EFA under LEAP will automatically qualify for all of the low-income electricity customer service rules.

⁵ For additional information on the customer service codes for eligible low-income electricity customers, please visit http://www.ontarioenergyboard.ca/OEB/ Documents/Press%20Releases/bckgrndr_lowincome.pdf

After a customer is qualified as an eligible low-income electricity customer, the low-income status will remain in effect for purposes of the Codes for 2 years from the date the customer was qualified.

A customer must contact his or her utility before a special eligible low-income electricity customer code rule will be made available.

The following sections summarize the customer service rules of eligible low-income **electricity** customers.

3.2 Security Deposits

If an eligible low-income electricity consumer has previously paid the utility a security deposit, the customer may ask for it to be returned, after he or she has paid any outstanding arrears. Any remaining security deposit returned will be credited to the customer's account if the amount due is less than the customer's average monthly bill. If the amount is equal to or greater than the customer's average monthly bill, the customer may request a refund by cheque.

If the customer is an eligible low-income electricity customer and the utility requests a security deposit, the customer may request and receive a waiver.

3.3 Under-Billing Adjustments

When a billing error has occurred and an eligible low-income electricity customer owes the utility for an underpayment, the utility must notify the customer that he or she may elect to pay over:

- (i) a period equal to the duration of the billing error, up to a maximum of 2 years; or
- (ii) over a period of 10 months where the under-billed amount is less than twice the customer's average monthly bill, and over a period of 20 months where the under-billed amount equals or exceeds twice the customer's average monthly bill.

3.4 Equal Monthly Payment and Equal Billing Plans

In addition to the "equal monthly payment plans" available to all electricity customers (including low-income electricity customers), which require the customer to have a bank account, eligible low-income electricity customers could request from their utility to provide them with an equal billing plan that does not require monthly withdrawals from a bank account.

An “equal billing plan” means a billing plan where a bill is issued, for example monthly or bi-monthly, to a customer and the amount due in each bill is equalized over the billing periods in the year.

Where an eligible low-income electricity customer is served by a utility that bills monthly or bi-monthly and is not enrolled with an energy retailer, the customer may request from the utility a prescribed equal billing plan where payments are equalized over the billings periods in the year.

Some utilities may voluntarily offer equal billing or equal payment plans to residential electricity customers, including low-income electricity customers, enrolled with retailers.

3.5 Disconnection Period

If, during the disconnection notice period a social service or government agency advises a utility that they are assessing whether a residential electricity customer is eligible for bill payment assistance, the utility must suspend disconnection action for a period of 21 days after receiving notification from the agency.

3.6 Assistance Information before Disconnection

Information provided by the utility in the written disconnection notice, and in the final attempted telephone call 48 hours before disconnection, must include reference to the special arrears payment agreement available for eligible low-income electricity customers.

The disconnection notice, and telephone call to be attempted 48 hours before disconnection, must also inform customers that emergency financial assistance and other programs are available for eligible low-income electricity customers, and that more information is available from their electricity utility.

3.7 Arrears Payment Agreements

3.7.1 Down-Payment

A down-payment of up to 10% may be requested the first time an eligible low-income electricity customer enters into a low-income arrears agreement or after having successfully completed a previous such agreement.

3.7.2 Repayment Time Periods

The time periods to repay arrears under a low-income arrears agreement are:

- 8 months if the amount the customer owes is less than or equal to 2 times his or her average monthly bill

- 12 months if the amount the customer owes is more than 2 and less than or equal to 5 times his or her average monthly bill
- 16 months if the amount the customer owes is more than 5 times his or her average monthly bill.

3.7.3 Service Charges and Late Payment Charges

Outstanding late payment charges need not be waived by the utility when an eligible electricity customer enters into a low-income arrears agreement; however, such an eligible low-income electricity customer cannot be charged additional late payment charges on the amount that is covered by the agreement after he or she has entered into the low-income arrears agreement.

Service charges related to collection, disconnection, non-payment and/or load control devices are to be waived when an eligible low-income electricity customer enters into a low-income arrears agreement for the first time or after he or she has successfully completed a previous such agreement.

3.7.4 Payment Defaults

Utilities can cancel the arrears agreement if an eligible low-income electricity customer defaults more than twice on making an arrears payment, a current bill payment, a security deposit due or an under-billing adjustment due.

The defaults must occur over at least a 2 month period.

3.7.5 Second or Further Arrears Payment Agreements

If an eligible low-income electricity customer successfully completes an arrears payment agreement, he or she can request a new agreement anytime needed thereafter.

However, if a new arrears agreement is requested within 12 months of the end of the first successfully completed low-income arrears agreement, the utility can offer the new arrears agreement on the terms applicable to the standard residential electricity customer arrears agreements.

3.8 Unit Sub-Meter Providers

The Board has issued a Notice of Proposal to amend the Unit Sub-Metering Code.⁶ If adopted, these proposed amendments will require unit sub-meter providers offer new

⁶ For additional information on the changes to the customer service standards for electricity-sector unit sub-metering providers, please visit <http://www.ontarioenergyboard.ca/OEB/Industry/Regulatory+Proceedings/Policy+Initiatives+and+Consultations/Unit+Sub-Metering+Code+Amendments>

customer service rules for residential and eligible low-income electricity customers similar to those offered by electricity distributors. It is expected these rules will come into force sometime in 2013. LEAP EFA applicants and social service agencies should contact the relevant unit sub-metering provider for information about the residential, including low income, customer service rules.

4. NATURAL GAS CUSTOMER SERVICE POLICIES

Natural gas distributors have updated, at the request of the Board, their own residential customer service policies.

4.1 Residential Natural Gas Customer Service Policies

In 2011, the Board adopted a rule requiring rate-regulated gas utilities to develop residential customer service policies and comply with them. The gas distributors are required to have customer service policies in the following areas:

- (a) bill issuance and payment;
- (b) allocation of payments between gas and non-gas charges;
- (c) correction of billing errors;
- (d) equal payment and equal billing plans;
- (e) disconnection for non-payment;
- (f) security deposits;
- (g) arrears management programs;
- (h) management of customer accounts; and
- (i) process for resolving customer complaints.

For more information on the applicable customer service policies, natural gas customers may contact the following:

Enbridge Gas Distribution Inc.

Telephone: (416) 495-5765

Email: Tanya.Ferguson@enbridge.com

Website: <https://www.enbridgegas.com/homes/customer-service/Conditions-of-service.aspx>

Kitchener Utilities

Telephone: (519) 741-2450

Website: http://www.kitchenerutilities.ca/pdf/Customer_Service_Practices.pdf

Union Gas Inc.

Telephone: 1-888-774-3111

Email: UGLAgencyAssist@uniongas.com

Website: <http://uniongas.com/aboutus/policies/>

4.2 Low-Income Natural Gas Customer Service Policies

The Board is completing a review of the natural gas distributors' customer service policies and practices with respect to low-income customers.⁷ As part of this review, the gas distributors may be making certain changes to their current residential customer service policies. Any changes in customer service policies and practices for low-income customers will be posted on the gas distributors' websites provided above.

⁷ The final Board directions will be issued later in 2012. They will be posted on the Board website, on the EB-2010-0280 project web page.

5. ENERGY CONSERVATION PROGRAMS

Low-income consumers often live in homes that are in need of energy efficiency upgrades. Energy conservation⁸ programs can be effective tools to assist low-income energy consumers to manage their overall energy usage and therefore better manage energy costs.

Some electricity utilities and natural gas utilities offer conservation programs. These may include programs that educate customers on how to lower their energy bills through conservation strategies, and programs that offer energy savings kits and/or the installation of equipment that can improve energy efficiency, which can result in on-going savings for households. Most of these programs may be offered free of charge to eligible low-income customers.

Social service agencies should refer potential low-income customers to these programs as they could assist in reducing their energy costs.

5.1 Electricity Conservation Programs

5.1.1 *saveONenergy HOME ASSISTANCE* Program

The **saveONenergy HOME ASSISTANCE** program helps qualified Ontario homeowners, tenants and social and/or assisted housing providers improve the energy efficiency of their homes. Participating in the program can help reduce energy use, help manage energy costs and improve home comfort. The **HOME ASSISTANCE** program is funded by the Ontario Power Authority and offered by participating electricity utilities.

If an eligible low-income customer qualifies for LEAP-EFA, they may also be eligible for the **HOME ASSISTANCE** program.

The program focuses on improving home energy efficiency through the free installation of:

- energy-saving light bulbs
- power bars
- low-flow showerheads (in homes with electric water heating)
- faucet aerators (in homes with electric water heating)

⁸ In Ontario, the term “conservation and demand management” or “CDM” is typically used in relation to energy conservation programs by electricity utilities, while “demand-side management” or “DSM” is typically used in relation to energy conservation programs by natural gas utilities.

Low-income customers may also be eligible for a new, energy-efficient refrigerator or other appliance, such as a room air conditioner. If they live in an electrically heated home they may also be eligible for a programmable thermostat, weatherstripping around doors and windows and additional insulation in the attic or basement.

The program includes a detailed in-home energy assessment, professional installation of energy-saving measures and advice on steps that can be taken to save even more energy.

All conservation devices and products provided under the HOME ASSISTANCE program are directly installed in the home and are free of charge to participants.

The **HOME ASSISTANCE** program is not yet available in all areas of the province. For more information on the availability of the **HOME ASSISTANCE** program, please call the Ontario Power Authority at 1-877-797-7534.

5.2 Natural Gas Conservation Programs

Conservation programs are available for customers of some natural gas utilities. Both Enbridge Gas Distribution and Union Gas have developed a more comprehensive suite of free conservation programs for qualifying low-income customers. More information about the programs can be obtained from the utilities.

6. ELIGIBILITY CRITERIA & SCREENING GUIDELINES

LEAP EFA is designed to benefit qualifying low-income households that are customers of a utility or unit sub-metering provider. Each utility contributes funds that benefit only their customers or customers of unit sub-metering providers within the utility's service area.

The following sections outline the eligibility criteria and screening guidelines to be used by agencies in evaluating applications. Generally, to be considered for LEAP EFA, customers must meet the eligibility criteria set out in Section 6.1 (although there is an area of discretion for agencies as set out in Section 6.3 below). A customer that meets the criteria should then be further screened by the agency using the guidelines set out in Section 6.2.

6.1 Eligibility Criteria

In order to be eligible for a LEAP EFA grant, applicants must meet all of the following criteria:

- (i) are an existing customer of the utility providing the funding, or are an existing customer of a unit sub-metering provider operating within the service area of the utility;
- (ii) reside at the address for which there are arrears; and
- (iii) have a pre-tax household income at or below the Statistics Canada Low-Income Cut-Off (LICO) + 15%, taking into account family size and community size.

The LICO figures to be used in assessing eligibility are set out in Appendix B.

6.2 Screening Guidelines

In screening applicants, agencies should also consider the following:

- (i) Receipt of financial assistance should allow the applicant to maintain or reconnect energy service, in order to promote the sustainability of the customer's connection.
- (ii) The applicant has demonstrated a prior attempt to pay the bill. The service provider, as appropriate, can be contacted for information about the applicant's payment history if necessary. Agencies should consider future sustainability of the applicant's connection in addition to past payment performance.
- (iii) The applicant is in threat of disconnection or has been disconnected. Agencies should focus on providing *emergency* assistance, but will need to balance this

with early intervention (e.g. assistance to applicant in arrears but who have not yet received a disconnection notice or been disconnected).

- (iv) Funding should be accessed only once per year per fuel, up to the financial cap (see Section 7).

6.3 Agency Discretion

If an applicant does not meet the income threshold or the screening guidelines set out in Sections 6.1 and 6.2, respectively, the agency may exercise discretion in exceptional circumstances and approve the applicant. In such cases, the agency should have a documented rationale.

However, please note that the criteria to be an existing customer of the utility providing the funding, or an existing customer of a unit sub-metering provider operating within the service area of the utility, and to reside at the address for which there are arrears (Sections 6.1 (i) and (ii)) are mandatory requirements and must be met.

7. GRANT LEVEL

The grant level is set at a maximum of \$500 per fuel per household per year⁹. Agencies may use their judgement for customers with electrically heated homes to offer up to \$600 per household, if necessary.

If the applicant owes *less* than the maximum, the grant cannot exceed the amount owed.

If the applicant owes *more* than the maximum, a maximum grant of \$500 (or \$600 for an approved electrically heated home) may be provided, as long as the applicant will be able to sustain their energy service following the grant. In such cases, the agency should have a documented rationale.

Options for applicants who owe more than the maximum to sustain their energy service include:

- Entering into an arrears payment arrangement with the service provider for the balance owing (see Section 3.7); and/or
- Supplementary assistance through other funds for the balance. A summary of selected other funds is provided in Section 8.

If these options are not available the applicant may be denied assistance on the basis that they cannot sustain their energy service and should be referred to other programs for assistance. Grants should not include amounts owed for equipment rental (e.g. water heater) or equipment financing charges.

⁹ A household could therefore receive \$500 for electricity bill arrears, and \$500 for natural gas arrears.

8. APPLICATION PROCESS

It is anticipated that referrals to LEAP EFA will come from a variety of sources, including utility or unit sub-metering provider customer service representatives, community service agencies, the 211 Community Service Information line, the OEB's Consumer Relations Centre and governmental and/or political representatives. Applicants should be referred to the Lead / Intake Agency serving the area in which they reside.

8.1 STEP 1: Pre-Screening

To assist with the large number of inquiries during program delivery, workers at each Intake Agency should pre-screen the applicants over the phone prior to booking an appointment. At pre-screening, five questions are asked:

1. Are you a customer of a natural gas or electricity utility or unit sub-metering provider?
2. Do you reside at the address with arrears?
3. What is your yearly/monthly gross (pre-tax) household income?
4. What are your sources of household income?
5. How many people are in your household?

Applicants, who are not current utility or unit sub-metering customers, or who do not meet the income criteria, are not eligible for LEAP EFA. They may however be eligible for conservation programs, and should be advised of this. If the applicant is not eligible, they should also be informed and provided with information on other resources.

If, based on the information provided during the pre-screening, the caseworker determines that the applicant may be eligible for assistance, the caseworker should proceed with an application. It is at the discretion of the agency whether they begin the application process over the phone with the applicant and then have the applicant come in for an Application Interview, or whether they require the applicant to come in for an Application Interview to *start* the application process.

Before proceeding with the application, agencies must obtain the applicant's consent for the release of personal information required to effect the application. If the agency starts the application process over the phone, consent may be verbal for this stage, but written consent must be obtained when the applicant comes to the agency for the Application Interview.

In-person interviews are required in most cases during the application process for the purpose of confirming and verifying personal information. However, to address issues related to mobility or transportation issues, or the geographic distance between the

applicant and the agency office (in the north in particular), telephone interviews are permitted in some situations, for example where:

- The community served is a large geographical area, where travel required to an in-person interview would cause hardship to the customer (assessed at the discretion of the intake/lead agency); or
- The applicant is experiencing mobility or travel difficulties due to age, disability, illness or injury.

In these cases, the agency may conduct telephone interviews to discuss the situation and review documentation. Applicants will still need to provide all required documentation and signatures, for example via fax or email, which may delay the grant process.

8.2 STEP 2: Scheduling Interview Appointments

Each intake caseworker is responsible for booking appointments for their agency and informing the applicant of criteria and documentation required for the Application Interview. The caseworker should record the date of the appointment, client's name, address, service provider and account number.

The applicant must be informed that they're required to bring the following documents to the interview:

1. Current energy bills for their residence – these should verify the amount of arrears;
2. Notice of Service Disconnection, if applicable;
3. Applicant Identification - two pieces of I.D. for the main applicant, and 1 piece of I.D. for each of the other household members are required;
4. Copy of rental receipt, lease or mortgage document;
5. Proof of household income – cheque stubs, a letter from the employer and/or income tax return; and
6. Bank statement from the most recent month, if required by the agency.

The caseworker should advise the applicant that all adults living in the household should attend the interview, if possible.

8.3 STEP 3: Application Interview

During the Application Interview, the caseworker reviews all the documentation, obtains consent and completes the *LEAP EFA Application Form* with the applicant.

8.3.1 Obtaining Consent

Before proceeding with the application, agencies must obtain the applicant's consent for the release of personal information required to effect the application. Agencies are asked to have the applicant sign the Consent to Disclosure of Personal Information form (see Appendix G). Note that caseworker may have to complete several different consent forms if advocating on behalf of the client for multiple service providers and social service agencies (i.e. Ontario Works, ODSP, etc.).

The applicant should be informed that no information can be shared with companies or agencies without signed consent provided by the applicant.

8.3.2 Documentation

All required documentation should be checked and copies made for the file. If the applicant does not provide the required documentation at the time of the interview, it's important to explain to the applicant that the application cannot be processed until the applicant provides **all** the necessary documents.

8.3.3 Completing the LEAP EFA Application Form

The *LEAP EFA Application Form* (see Appendix G) should be completed by the caseworker during the Application Interview for all eligible applicants. It is important to complete the form in its entirety for all applicants.

The information recorded on the *LEAP EFA Application Form* must be verified with the applicant and service provider, where appropriate, and checked against the documentation submitted.

Agencies with existing application forms may use their own forms instead of the EFA Application Form provided that all of the information required by the LEAP EFA Application Form is collected. References in this LEAP EFA Manual to the LEAP EFA Application Form imply the LEAP EFA Application Form or any suitable replacement used by agencies.

8.4 STEP 4: Verifying with the Service Provider

It is important to verify the arrears-related information provided by the applicant with the applicant's service provider. Information to be confirmed includes the amount owing on the account; whether a disconnection notice has been issued; any payments made on the account; and any discussions the applicant has had with the service provider.

Electricity utilities are required by the OEB's codes to put a 21-day hold on a scheduled disconnection in certain circumstances (as outlined in section 3.5 above). Therefore

social agencies should contact the utility to advise that they are assessing the applicant's eligibility to determine whether they are eligible for LEAP EFA. It is at the discretion of the Lead and Intake agencies as to which agency undertakes this step, and at what stage in the application process they notify the utility of the assessment. However, it is important to note that when a utility issues a disconnection notice for non-payment, a customer generally has 10 days from the day the notice is received to pay his or her bills to avoid disconnection. Therefore, the utility should be notified of the social agency's assessment within that 10-day period.

There are currently no similar rules for unit sub-metering providers or natural gas utilities regarding putting a hold on disconnection. However, the agency should still contact the unit sub-metering provider, or natural gas utility, as appropriate, to notify them that they are assessing the applicant's eligibility.

Due to privacy concerns, service providers also require that a signed *Consent to Disclosure of Personal Information* form (provided in Appendix G) be faxed before they can discuss customer and account information with caseworkers.

8.5 STEP 5: Recommendation about Funding

Once the application has been completed and signed, and the information verified (including service provider verification), it's up to the intake caseworker to make a recommendation regarding funding. The recommendation should address both whether or not to approve the application, and the amount of the grant to be provided. The caseworker should complete the information in the appropriate section of the *LEAP EFA Application Form*.

One of the key factors to consider when determining a funding recommendation is whether or not the disconnection will be halted and the applicant will still be able to pay their energy bills in the future. LEAP EFA is not intended to provide long-term financial assistance and applicants must be able to maintain their energy costs after the grant has been made.

If the recommendation is to deny the application, it's important to document the reasons why the application is being denied. There is a section on the *LEAP EFA Application Form* to record this information.

8.6 STEP 6: Lead Agency Review

If your community has Lead and Intake agencies, a completed *LEAP EFA Application Form* must be sent to the Lead Agency for processing with all the required documentation attached. The following documentation should be sent to the Lead Agency:

1. A copy of the completed *LEAP EFA Application Form*;
2. A copy of the energy bill;
3. A copy of the applicant's income stub, employment letter, and/or income tax return for all adult occupants within the household;
4. A copy of the signed Consent to Disclosure of Personal Information form;
5. A copy of proof of rent or mortgage amounts; and
6. A copy of most recent monthly bank statement.

The Lead Agency should check the application for completeness and review the recommendation for funding made by the Intake Agency caseworker. Applications that are incomplete will not be processed for funding until complete. It is the duty of each intake caseworker to ensure that all applications are completed prior to submitting them to the Lead Agency.

If the Lead Agency is satisfied that the application is complete, the eligibility criteria are met, or where not met, the Lead Agency is satisfied with the Intake Agency's rationale for approval, and agrees with the worker's recommendation for funding, the application is approved. (If your agency serves both the Lead and Intake functions this step will, of course, not be required.)

Once the application has been approved, the service provider should be contacted and requested to stop any further disconnection or collection action on the applicant's account. If the application is denied, the service provider should be contacted and informed of the decision. It is at the discretion of the Lead and Intake agencies as to which agency is responsible for this step.

8.6.1 Outstanding Questions

If there has been a recommendation by the caseworker for funding but outstanding questions remain regarding the application, the Lead Agency will contact the worker to resolve the issues. The application may be returned to the Intake Agency for completion or denied on the basis of not meeting the criteria.

8.6.2 Notifying the Applicant

At no time is the caseworker permitted to communicate to an applicant that they will receive a grant through LEAP EFA, without first receiving official confirmation from the Lead Agency. Once the Intake Agency receives confirmation from the Lead Agency, the caseworker may contact the applicant and inform him/her of the decision.

It's important that applicants to LEAP EFA be notified as soon as possible whether or not their application has been approved. This is important for two reasons:

1. If the application is approved but payment is not reflected on the applicant's account with the service provider within a reasonable amount of time, the applicant should be directed to the Intake Agency caseworker. The Intake Agency caseworker should then contact the Lead Agency or utility for a status update.
2. If the application has been denied, the applicant needs to be notified so that he/she can make other arrangements regarding payment to the service provider.

8.6.3 Appeals / Request for Internal Review

If the applicant is denied, they must be informed about the appeals process and how to access it. The Lead Agency is responsible for developing and implementing an appeals/internal review process for applicants that are not satisfied with the outcome of their application. Lead Agencies may use an existing process, *provided that* it includes an independent review of the application (i.e. the application must be reviewed by someone that was not part of the original review and assessment). Alternatively, a sample appeals process is included in Appendix F for consideration by Lead Agencies, and a template appeals form is provided in Appendix G.

8.6.4 Grant Payments

Grants are issued by the Lead Agency on behalf of the applicant directly to the service provider. The payment is NEVER issued directly to the applicant.

Payments are issued to service providers according to the schedule agreed upon by the Lead Agency and service provider. Each payment (cheque) will reflect amounts to be paid to multiple LEAP EFA recipient accounts. A separate cheque is not issued for each recipient's account. Each cheque is accompanied by a list of approved applicants with their account numbers and other relevant information. Agencies may use the Payment Remittance form provided as Appendix F for this purpose.

Please note: It may take up to two weeks for the cheque to be processed and the payment posted on the recipient's account. Due to the timing of the cheque requisition process, recipients may receive another bill prior to the payment being processed on their account. Recipients should contact the Intake Agency offices for follow-up. If they have questions, his/her worker can contact the Lead Agency for an update on the account. The Lead Agency will work with the caseworker and the service provider or designate to resolve any issues.

8.7 STEP 7: Referrals to Other Programs & Services

In addition to, or instead of, LEAP EFA, some applicants could benefit from other assistance programs or services such as conservation programs and/or special low-income customer service measures (summarized in section 3 above). There is a section on the LEAP EFA Application Form to list where referrals are made. It's important to record each referral provided to an applicant as this allows for the tracking of statistics for the purposes of program reporting and evaluation.

For the OPA's electricity conservation program, it is anticipated that if the applicant is eligible based on their income and the responses they provide to the conservation pre-screening questions and they consent to sharing their information with the conservation program administrators, their contact information should be forwarded to the agency responsible for administration of the conservation programs in their area (as per the contact list to be provided by the OPA to all LEAP EFA Intake Agencies).

8.8 STEP 8: Program Reporting and other Administrative Requirements

The Lead Agency's **Monthly Report**, contained in Appendix C.1, must be submitted to their respective utility partner(s) by the 15th day of the following month. This report allows the funding utilities to monitor fund levels and ensure that agencies and call centres are advised when funds are nearing depletion.

The **Year-end Report**, which consists of the Annual Reporting Requirements, contained in Appendix C.2, and the Monthly Monitoring, contained in Appendix C.3, is required to be submitted by the lead agencies to the utility by January 31st and February 28th of the following year, respectively. The Year-end Report serves two functions: the information about program spending is needed by the utilities to fulfill their regulatory reporting obligations to the OEB; and, the demographic information, in addition to the information about program spending, can be used to provide valuable feedback to the OEB, utilities and social agencies as to the operation of LEAP EFA, and whether any changes to the program are needed.

Since most of the information can only be collected during the interview process with the applicant, it is of vital importance that the applications are completed in their entirety.

The metrics to be tracked and reported are set out in Appendix C.

8.8.1 Files

All application forms and corresponding documentation (whether the application is approved or not) are to be filed and stored at the location and using the method

agreed upon between the Lead and Intake Agencies. Files must be stored in compliance with relevant legal requirements.

8.8.2 Confidentiality

The information collected from applicants throughout the application process includes information of a personal nature, such as income, which would normally be viewed as private and confidential. Lead and Intake Agencies should all take reasonable and appropriate steps to safeguard the confidentiality of this information by storing electronic and hard copies of the information securely.

9. OTHER SOURCES OF FUNDING

Applicants may be able to access other sources of funding for assistance with energy arrears. These funds may be particularly helpful for customers who do not qualify for LEAP EFA, or where the maximum grant is not sufficient to cover the customer's arrears.

9.1 Emergency Energy Fund

The Emergency Energy Fund is a provincial government program that provides funding for utility arrears, security deposits and reconnection costs for consumers of electricity, natural gas, oil and other forms of energy. The fund is administered by municipalities, some of which sub-contract delivery to social service agencies. The maximum grant per household is the amount required by the service provider to maintain or reconnect service. Funds are available year round, or at least as long as the annual allocation lasts.

9.2 Recipients of Ontario Works and Ontario Disability Support Program

Applicants that are eligible for Ontario Works ("OW") or the Ontario Disability Support Program ("ODSP") may be able to obtain assistance with energy arrears through the Community Start-Up and Maintenance Benefit ("CSUMB"). To assist such applicants with accessing CSUMB, agencies should contact the local OW or ODSP office as appropriate.

9.2.1 Discretionary Benefits under OW and ODSP

Individuals receiving OW or ODSP may be eligible for discretionary benefits for, among other costs, funds for utility and/or heating arrears. The fund is municipally administered.

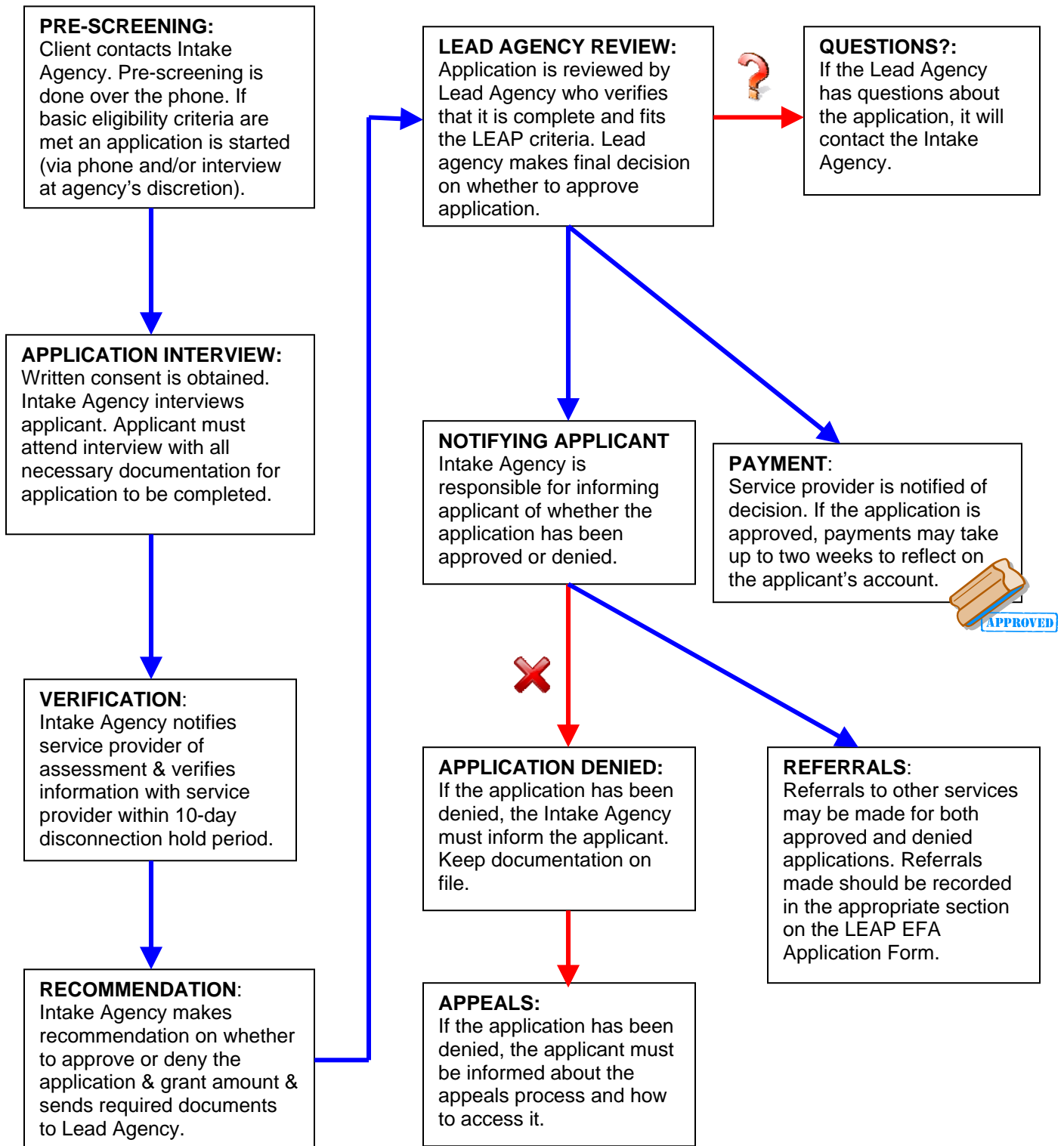
9.2.2 Advocating for Recipients of OW or ODSP Benefits

The Intake Agency caseworker may advocate on behalf of an applicant receiving OW or ODSP however, the applicant must provide the appropriate consent, which must be then provided to the applicant's caseworker. Please keep a copy of all signed consent forms with the application package for that applicant, in case it's not received by the caseworker.

9.2.3 Toronto's Shelter Fund

Applicants in Toronto who are eligible for OW or ODSP and who have at least one dependent under the age of 18, may be able to access help with energy arrears through the Shelter Fund if they have exhausted their eligibility for CSUMB. To assist such applicants with accessing the Shelter Fund, agencies should contact the local OW or ODSP office as appropriate.

Appendix A – Application Flowchart (for communities with Lead and Intake Agencies)



Appendix B – Income Eligibility Chart

For **LEAP Emergency Financial Assistance**, pre-tax household income must be at or below the **low-income cut-off (LICO) + 15%**, taking into account both family size and community size. The LICO + 15% score is based on Statistics Canada's Low Income Cut Offs Before Tax Table, which is updated as soon as the Consumer Price Index is available. The LEAP EFA LICO scores will be updated based on availability from Statistics Canada. For more information on Statistics Canada's LICO Tables, please visit - <http://www.statcan.gc.ca/pub/75f0002m/2011002/tbl-eng.htm>

Statistics Canada Low Income Cut Offs (LICO), 2010, before tax (current dollars)¹⁰:

SIZE OF FAMILY UNIT		LEAP Emergency Financial Assistance				
		COMMUNITY SIZE				
		Rural areas	Less than 30,000	30,000 to 99,999	100,000 to 499,999	500,000 and over
1 person	LICO	\$15,583	\$17,729	\$19,375	\$19,496	\$22,637
	+15%	\$17,920	\$20,388	\$22,281	\$22,420	\$26,033
2 persons	LICO	\$19,400	\$22,070	\$24,120	\$24,269	\$28,182
	+15%	\$22,310	\$25,381	\$27,738	\$27,909	\$32,409
3 persons	LICO	\$23,849	\$27,132	\$29,652	\$29,836	\$34,646
	+15%	\$27,426	\$31,202	\$34,100	\$34,311	\$39,843
4 persons	LICO	\$28,957	\$32,943	\$36,003	\$36,226	\$42,065
	+15%	\$33,301	\$37,885	\$41,404	\$41,660	\$48,375
5 persons	LICO	\$32,842	\$37,363	\$40,833	\$41,086	\$47,710
	+15%	\$37,768	\$42,968	\$46,958	\$47,249	\$54,867
6 persons	LICO	\$37,041	\$42,140	\$46,054	\$46,339	\$53,808
	+15%	\$42,597	\$48,461	\$52,962	\$53,290	\$61,879
7+ persons	LICO	\$41,240	\$46,916	\$51,274	\$51,591	\$59,907
	+15%	\$47,426	\$53,953	\$58,965	\$59,330	\$68,893

¹⁰ Source: <http://www.statcan.gc.ca/pub/75f0002m/2011002/tbl/tbl02-eng.htm>

Appendix C – Lead Agency Reporting & Tracking Requirements

Where an agency administers LEAP Emergency Financial Assistance for more than one utility, it is important to remember that utility funds cannot be pooled together. Funds and other reporting information must be separately tracked for each utility.

For the purposes of this section, an applicant is defined as a household who has had an application form completed and verified. For greater clarity, this includes households that have been approved for assistance and those that have been denied assistance.

1. **Monthly Reporting Requirements:**

The following is a list of information that must be sent by lead agencies to their respective utility partner(s) on the 15th day of the following month:

- **Funds remaining** - Money that remains after the total spent to date (pay-out) is deducted from the total funds given by the utility at the beginning of the program year. The total spent should include amounts for both grants to customers, and program costs (maximum 15%).
- **Funds dispersed/spent, broken down by:**
 - **Total** – total money spent.
 - **Agency Administration & Program Delivery fee** – total money allocated for agency administration & program delivery (maximum 15%).
 - **Grants to utility customers** – total money spent on grants to direct customers of the utility (i.e. customers that receive a bill directly from a utility listed in Appendix D of the LEAP Manual)
 - **Grants to unit sub-metering customers** – total money spent on grants to customers of unit sub-metering providers that operate in the utility's service area (i.e. customers that receive a bill directly from a unit sub-metering provider listed in Appendix D of the LEAP Manual)
- **# applicants assisted (i.e. applicants approved) broken down by::**
 - **Total applicants** - total number of applicants who were approved for and received assistance
 - **Utility applicants** - total number of applicants who were approved for and received assistance that were direct customers of a utility
 - **Unit sub-metering applicants** - total number of applicants who were approved for and received assistance that were customers of a unit sub-metering provider

2. Annual Reporting Requirements

The following is a list of information that must be sent by lead agencies to their respective utility partner(s) to support the utility's regulatory reporting obligations to the OEB. The information must be sent to the utility by January 31st of the following year:

- **Budget** – total money received from the utility for one calendar year;
- **Funds dispersed/spent, broken down by:**
 - **Total** – total money spent
 - **Agency Administration & Program Delivery fee** – total money allocated for agency administration & program delivery (maximum 15%)
 - **Grants to utility customers** – total money spent on grants to direct customers of the utility (i.e. customers that receive a bill directly from a utility listed in Appendix D of the LEAP EFA Manual)
 - **Grants to unit sub-metering customers** – total money spent on grants to customers of unit sub-metering providers that operate in the utility's service area (i.e. customers that receive a bill directly from a unit sub-metering provider listed in Appendix D of the LEAP EFA Manual)
- **# applicants, broken down by:**
 - **Total applicants** - total number of applicants who applied for assistance (both utility customers and unit sub-metering customers)
 - **Utility applicants** - total number of applicants who applied for assistance that were direct customers of a utility
 - **Unit sub-metering applicants** - total number of applicants who applied for assistance that were customers of a unit sub-metering provider
- **# applicants assisted (i.e. applicants approved) broken down by::**
 - **Total applicants** - total number of applicants who were approved for and received assistance
 - **Utility applicants** - total number of applicants who were approved for and received assistance that were direct customers of a utility
 - **Unit sub-metering applicants** - total number of applicants who were approved for and received assistance that were customers of a unit sub-metering provider
- **# applicants denied, broken down by:**
 - **Total applicants** - Total number of applicants that applied for assistance but were not approved
 - **Utility applicants** - Total number of applicants that applied for assistance but were not approved that were direct customers of a utility
 - **Unit sub-metering applicants** - Total number of applicants that applied for assistance but were not approved that were customers of a unit sub-metering provider

- **Average grant per accepted applicant assisted:**
 - **Total** – average grant amount allocated per applicant, measured across both utility and unit sub-metering customers
 - **Utility average** - average grant amount allocated per applicant that were direct customers of a utility
 - **Unit sub-metering average** – average grant amount allocated per applicant that were customers of a unit sub-metering provider

- **Non-utility funds** – total funds received from non-utility sources (i.e. donations) that were earmarked for, and used to top up the LEAP EFA funds.
 - **Include** - funds received by the utility from a third party or from the utility's shareholder(s) (i.e., not funded from distribution revenues) as a donation and then provided by the utility to its social agency partner(s)
 - **Exclude** - funds received under the terms of the settlement of the class action proceeding regarding late payment penalties

- **The month LEAP EFA funds were depleted.**

3. Monthly Monitoring

The following is a list of information that intake and/or lead agencies should track on a monthly basis. This information should be collected by the agencies throughout the year, to be submitted to their respective utility partner(s) by February 28 of the following year.

- **Total number of adults assisted**
- **Total number of children assisted**
- **Average monthly income per applicant**
- **Primary source of income – total number by:**
 - Employment income
 - Ontario Works (OW)
 - Child Tax Benefit (CTB)
 - Ontario Disability Support Program (ODSP)
 - Workplace Safety and Insurance Board (WSIB)
 - Social assistance (i.e. ODSP, OW, etc.)
 - Employment insurance (EI)
 - Ontario Student Assistance Program (OSAP)
 - Canada Pension Plan (CPP)
 - Other
- **Average arrears owed per applicant**
- **Housing type of applicant – total number by:**
 - Rent
 - Own
 - Community or social housing
 - other
- **Applicant type – total number by:**
 - Single (no children)
 - Single (with children)
 - Married or common-law (no children)
 - Married or common-law (with children)
 - other
- **Reasons applicants not accepted – total number by:**
 - Do not meet income eligibility criteria
 - Already accessed funds during program year
 - Insufficient funds remaining
 - other
- **Number of applications where grant amount was adequate to cover arrears– total number**
- **Reason for needing assistance – total number by:**
 - Job loss
 - Illness
 - Unusually high bill

- Pending EI
- Other
- **How applicants heard about the program – total number by:**
 - Word of mouth
 - Utility referral
 - Utility website
 - Social agency
 - Ontario Energy Board website
 - Ontario Energy Board customer relations centre
 - TV
 - Radio
 - Newspaper
 - Billing Insert
 - Poster
 - Other
- **Total number of applicants where funding not required because advocacy with utility was successful**
- **Total number of applicants also referred to utility conservation programs**

Appendix D – List of Service Providers

Electricity Utilities Offering LEAP Emergency Financial Assistance

Algoma Power Inc.	Kenora Hydro Electric Corporation Ltd.
Atikokan Hydro Inc.	Kingston Hydro Corporation
Attawapiskat Power Corporation	Kitchener-Wilmot Hydro Inc.
Bluewater Power Distribution Corporation	Lakefront Utilities Inc.
Brant County Power Inc.	Lakeland Power Distribution Ltd.
Brantford Power Inc.	London Hydro Inc.
Burlington Hydro Inc.	Middlesex Power Distribution Corporation
COLLUS Power Corporation	Midland Power Utility Corporation
Cambridge and North Dumfries Hydro Inc.	Milton Hydro Distribution Inc.
Canadian Niagara Power Inc.	Newmarket - Tay Power Distribution Ltd.
Centre Wellington Hydro Ltd.	Niagara Peninsula Energy Inc.
Chapleau Public Utilities Corporation	Niagara-on-the-Lake Hydro Inc.
Chatham-Kent Hydro Inc.	Norfolk Power Distribution Inc.
Clinton Power Corporation	North Bay Hydro Distribution Limited
Cooperative Hydro Embrun Inc.	Northern Ontario Wires Inc.
Cornwall Street Railway Light and Power Company Ltd. ¹¹	Oakville Hydro Electricity Distribution Inc.
Dubreuil Forest Products Ltd.	Orangeville Hydro Limited
E.L.K. Energy Inc.	Orillia Power Distribution Corporation
ENWIN Utilities Ltd.	Oshawa PUC Networks Inc.
Enersource Hydro Mississauga Inc.	Ottawa River Power Corporation
Erie Thames Powerlines Corporation	PUC Distribution Inc.
Espanola Regional Hydro Distribution Corp.	Parry Sound Power Corporation
Essex Powerlines Corporation	Peterborough Distribution Incorporated
Festival Hydro Inc.	Port Colborne Hydro Inc.
Fort Albany Power Corporation	PowerStream Inc.
Fort Frances Power Corporation	Renfrew Hydro Inc.
Greater Sudbury Hydro Inc.	Rideau St. Lawrence Distribution Inc.
Grimsby Power Inc.	Sioux Lookout Hydro Inc.
Guelph Hydro Electric Systems Inc.	St. Thomas Energy Inc.
Haldimand County Hydro Inc.	Thunder Bay Hydro Electricity Distribution Inc.
Halton Hills Hydro Inc.	Tillsonburg Hydro Inc.
Hearst Power Distribution Company Limited	Toronto Hydro-Electric System Limited
Horizon Utilities Corporation	Veridian Connections Inc.
Hydro 2000 Inc.	Wasaga Distribution Inc.
Hydro Hawkesbury Inc.	Waterloo North Hydro Inc.
Hydro One Brampton Networks Inc.	Welland Hydro-Electric System Corp.
Hydro One Networks Inc.	Wellington North Power Inc.
Hydro One Networks Inc./Cat Lake Power	West Coast Huron Energy Inc.
Hydro One Remote Communities Inc.	West Perth Power Inc.
Hydro Ottawa Limited	Westario Power Inc.
Innisfil Hydro Distribution Systems Limited	Whitby Hydro Electric Corporation
Kashechewan Power Corporation	Woodstock Hydro Services Inc.

¹¹ Cornwall Street Railway Light and Power Company Limited is a non-rate regulated utility and is not required to offer LEAP-EFA, however it has chosen to do so.

Natural Gas Utilities Offering Winter Warmth/LEAP Emergency Financial Assistance

Enbridge Gas Distribution (Winter Warmth/LEAP-EFA)
Kitchener Utilities (LEAP-EFA)¹²
Natural Resource Gas Limited (LEAP-EFA)
Union Gas (Winter Warmth)
Utilities Kingston (LEAP-EFA)¹³

Unit Sub-metering Providers

The following are unit sub-metering providers licensed by the OEB.

1221981 Ontario Limited
Carma Industries Inc.
Dynergy Energy Management Inc.
EnerCare Connections Inc.
Enercan Energy Management - Division of 373948 Ontario Inc.
Golden Horseshoe Metering Systems Inc.
Hydro Connection Inc.
Intellimeter Canada Inc.
Odem Electric Billing Services Inc.
Olameter Inc.
Priority Submetering Solutions Inc.
Provident Energy Management Inc.
Trilliant Energy Services Inc.
Whitby Hydro Energy Services Corp.
Wyse Meter Solutions
YES Energy Management, Inc.

¹² Kitchener Utilities is a non-rate regulated utility and is not required to offer LEAP-EFA, however it has chosen to do so.

¹³ Utilities Kingston is a non-rate regulated utility and is not required to offer LEAP-EFA, however it has chosen to do so.

Appendix E – Summary of Residential Electricity Customer Service Rules

Below is a summary of the residential customer service rules for electricity distributors¹⁴. This summary is a synopsis and is not intended, nor should it be used as an interpretive tool for the Code amendments for any purpose, or in any forum. This summary is a narrative and informal description of the various amendments made to the Codes and it has no legal or regulatory role in its interpretation, implementation or enforcement. For customer service rules applicable to low-income customers, please see Section 3.

1. Bill Issuance & Payment

The minimum payment period before a late payment penalty can be applied must be at least 16 days from the date the bill was issued to the customer.

The date on which a bill was issued is determined to be three days after it was printed if sent by mail or on the date on which an e-mail was sent over the internet. A bill payment is deemed to be received from the customer: three days before it is received by the distributor if sent by mail; on the date when the payment is acknowledged by a bank, or when a credit card payment is accepted by a financial institution.

Any payment made after 5:00 p.m. is still effective on the day the payment is made. If a due date is a non-business day, it is extended to the next business day.

If a bill issued to a residential customer includes charges other than electricity charges, any partial payment must first go directly to the electricity charges and then, if funds are remaining, to the other charges in the following order: arrears agreement payments, outstanding security deposits, under-billing adjustments and non-electricity charges.

If payment is sufficient to cover electricity charges, the distributor shall not levy late payment charges or disconnect the electricity supply. These rules apply to existing joint billing agreements when they are renewed, or after two years, whichever comes sooner.

2. Disconnections for Non-Payment

Disconnections Notices

All customers must receive 10 days notice before being disconnected for non-payment.

¹⁴ For additional information on the Board's customer service code changes for residential customers, please visit <http://www.ontarioenergyboard.ca/OEB/Industry/Regulatory+Proceedings/Policy+Initiatives+and+Consultations/Electricity+Distributors++Customer+Service>

Residential customers who have provided documentation from a physician that disconnection will pose a significant health risk to a person that regularly resides with the customer, must receive 60 days notice before being disconnected for non-payment.

A residential customer may designate a third party to receive any future notices of disconnection.

When a disconnection notice is issued for a building with multiple units and a master meter, a copy of the notice must be posted in a conspicuous place on or in the building.

Disconnection notices sent to residential customers must contain prescribed information, such as the earliest and latest date disconnection may occur, the forms of payment a customer may use, that a Board-prescribed standard arrears management program and equal monthly payment plan may be available, and that a disconnection may take place whether or not the customer is home at the time.

A distributor must act on a disconnection notice within 11 days after the applicable minimum 10 day notice period (or 60 day period, if significant health risk exists).

Disconnection and Payment Procedures

Distributors must make a reasonable effort to contact a residential customer one final time, in person or by telephone, prior to disconnecting service at least 48 hours before the scheduled disconnection date. There is certain prescribed information that a distributor must provide, including acceptable payment options available at this stage and advising that a standard arrears program and an equal monthly payment plan could be available.

Distributors must, at a minimum, have the facilities and staff available during regular business hours so residential customers can pay overdue amounts by credit card issued by a financial institution.

When a distributor visits a customer's property to disconnect service during or after regular business hours, the distributor must have the facilities or staff available to allow residential customers to pay overdue amounts by credit card and any other form of payment the distributor wishes to accept.

If a distributor has been unable to contact a residential customer 48 hours before a planned disconnection, they should generally make a reasonable attempt to communicate with the customer at the door (subject to consideration of the safety and security of utility field staff) to advise that payment may be made by a credit card issued by a financial institution.

Distributors shall reconnect a customer's property within two business days of payment in full or entering into an arrears management agreement 85% of the time.

Suspending Disconnection Action

If, during the disconnection notice period a social service or government agency advises a distributor they are assessing whether a residential customer is eligible for bill payment assistance, the distributor must suspend disconnection action for a period of 21 days after receiving notification from the agency.

If, during the disconnection notice period, a third party, who had previously been designated by a residential customer to receive any disconnection notices, advises a distributor they are attempting to arrange assistance to help the customer pay their bill, the distributor must also suspend disconnection action for a period of 21 days.

If an agency advises that the customer is not eligible for assistance, a distributor must act on the original disconnection notice within 11 days of being so informed by the agency. If disconnection does not occur within that period, the distributor must issue a new disconnection notice and start the process once again.

3. Security Deposits

Residential customers can pay a required deposit, an increase in a security deposit or a replacement of a deposit applied against arrears, in equal instalments over at least six months.

There must be a review of a residential customer's security deposit in the calendar year after the first anniversary of the first instalment payment.

A customer's average monthly consumption over a period of the most recent 12 consecutive months within the last two years shall be used to calculate the maximum amount a distributor can collect for a security deposit.

Security deposits must be applied against any arrears and be insufficient to cover any amounts owing before a disconnection notice can be issued to a residential customer.

When a security deposit has been applied against any arrears, the residential customer may have to repay the security deposit and must be allowed to repay in equal instalments over at least six months.

4. Equal Monthly Payment and Equal Billing Plans

Distributors are required to offer residential customers receiving standard supply service (i.e. for customers not enrolled with retailers) the option to join a prescribed equal monthly payment or an equal billing plan. In particular:

- Where the distributor bills monthly, the distributor must offer to its residential customers either an equal monthly payment option or an equal monthly billing option.
- Where the billing cycle is less frequently than monthly, the distributor must offer to its residential customers an equal monthly payment plan.

Customers that are in arrears and have not entered into an arrears payment agreement may be refused an equal monthly payment or equal billing plan.

Customers can join an equal monthly payment or equal billing plan any time of the year.

Residential customers on an equal monthly payment or equal billing plan must be given a choice of at least two dates within a month for automatic payments to be withdrawn or bill payments to be due.

Distributors offering an equal monthly payment plan may continue to issue bills on a monthly, bi-monthly, quarterly or annual basis.

Distributors will review customers' equal monthly payment and equal billing plans quarterly or semi-annually and adjust the equalized payment/billing if electricity consumption or approved charges have changed materially.

Distributors are required to reconcile all of their equal monthly payment and equal billing plans once during the calendar year but not on the 12th month anniversary of a customer joining the plan. If a customer is in the first year of a plan, they may be reconciled before 12 months.

If the annual reconciliation shows that the customer is owed an amount equal to or exceeding the customer's average monthly billing, the amount will be credited to the customer's account. The customer will be notified of this credit and will have 10 days to request a refund cheque instead of the credit on their bill.

If the annual reconciliation shows that the amount owed to the customer is less than the average billing amount, the amount will be credited to the customer's account.

If the annual reconciliation shows that the customer owes an amount equal to or exceeding the customer's average monthly billing, the distributor shall recover the balance over the first 11 months of the following year's equal monthly payment or equal monthly billing plan (or over 10 months where the distributor bills bi-monthly).

If the annual reconciliation shows that the amount the customer owes is less than the customer's average monthly billing, the distributor may collect the full amount by a charge on the bill in the 12th month of the equal monthly payment or equal monthly billing plan (or on the final bill of the year where the distributor bills bi-monthly).

5. Arrears Payment Agreements

Distributors must make standard arrears payment agreements available to any residential customer unable to pay their electricity charges.

Any security deposit must be applied to the amounts owing before entering into an arrears payment agreement.

Residential customers may be required to make a down payment of up to 15% of the arrears plus any accumulated late payment charges (not including other service charges such as reconnection charges) when entering into an arrears payment agreement.

If a residential customer owes less than twice their average monthly bill after applying the security deposit and down payment, the minimum length of time to pay the remaining amount is 5 months.

If a residential customer owes equal to or more than twice their average monthly bill after applying the security deposit and down payment, the minimum length of time to pay the remaining amount is 10 months.

Distributors can cancel the agreement if a residential customer defaults more than once on making an arrears payment, a current bill payment, a security deposit due or an under-billing adjustment due.

The above defaults must occur over at least a 2 month period.

Customers must be given 10 days written notice before an agreement can be cancelled, and the agreement must be reinstated if the customer pays in full before the cancellation date.

If an arrears agreement is terminated early, the distributor may require that a residential customer wait a year before entering into another agreement.

If a residential customer declines an arrears agreement then the distributor may proceed to disconnect and is not required to offer an agreement after disconnection.

6. Billing Adjustments

Over or under-billing adjustments are permitted over a period of up to two years for all classes of customers.

If a customer has been over-billed by an amount equal to or greater than the customer's average bill, the customer has the option of receiving a cheque or a credit on their next bill.

If a customer has been over-billed and the amount is less than the customer's average bill, the customer will receive a credit on their next bill. If the customer has outstanding arrears,

the distributor may apply the over-billed amount to the arrears first, and may credit or repay the balance to the customer.

If a customer is under-billed and is not responsible for the error, the customer is allowed to pay the under-billed amount in equal instalments over the same amount of time as they were under-billed for up to a maximum of two years. (e.g. if a customer has been under-billed for five months, they will have five months to pay the under-billed amount).

When a customer is responsible for the under-billing error, the distributor may require payment of the full amount on the next bill or on a separate bill.

These rules do not apply when a distributor has under-billed or over-billed a customer but issues a corrected bill within 16 days of the date the incorrect bill was issued.

7. Opening and Closing Accounts

If a distributor opens a new account based on a request from a third party, a letter must be sent to the new user within 15 days of the opening of the account. The account will not be set up if the new user has not approved the opening of the account within 15 days of the letter. However, a solicitor or person with Power of Attorney can agree on behalf of the new customer to the opening of the account.

Distributors can only recover charges from a person who has agreed in writing to become a customer.

When a tenant customer moves out of a residential rental unit, distributors cannot seek to recover future charges from any other person, including the landlord, unless that person has agreed in writing to assume responsibility for the account.

A distributor and a landlord may enter into an agreement where the landlord agrees to automatically assume responsibility for paying for continued service after the closure of a tenant's account.

The above rules do not apply to pre-existing agreements with landlords or other binding agreements for service.

8. Use of Load Control Devices

A "load control device" means a load limiter, timed load interrupter or similar device. A "load limiter device" allows the customer to run a small number of electrical items at any given time, but if the customer exceeds the limit of the load limiter then the device will interrupt the power until it is reset by the customer. A "timed load interrupter device" completely interrupts the customer's electricity intermittently for periods of time.

If a distributor installs a load control device (either load limiter or timed load interrupter) instead of disconnecting the customer because of past due amounts, it must provide a written explanation on how the device works and how it can be re-set and an emergency telephone number the customer can call for assistance. The distributor must also provide literature from the local fire marshal about the risks associated with disconnecting electricity.

A load control device may not be installed during the course of an arrears agreement.

If the customer enters into an arrears payment plan, or has paid the full amount outstanding, the load control device must be removed. The distributor should do so within two business days.

Appendix F – Sample Appeals/Internal Review Process

As set out in section 8.6.3 of the LEAP EFA Manual, lead agencies are required to have a review process for those applicants who disagree with the decision regarding their application for LEAP EFA funds. It is suggested that this process is clearly explained to all applicants when they are denied assistance, through phone or letter. Agencies can use the attached template to provide information on the appeals process to applicants whose application has been denied.

It is recommended that the review process for each agency include:

- The process for which applicants can register their request for review. For example, by letter, phone call or application;
- The time frame in which their request for review may be considered. 10 days is a suggested time frame;
- The review of the applicant's denial of assistance must be completed by agency staff who was not involved in the application process or the decision. If agencies do not have an appropriate internal staff for this, you may consider another partnering agency staff person. A panel may also be considered, containing an internal staff/a partnering agency/board member;
- Reviewers should be provided with the client's application, supporting documents and a description of the client's situation. If this information is provided to an outside agency, it will be important that consent to release information has been signed by the applicant before the information is signed; and
- There must be an appropriate time frame for the applicant to be informed of the decision resulting from the review. It is recommended that this is no longer than 5 days due to the urgency of the situation. Applicants should be informed in writing or by phone call.

Process for Requesting an Internal Review of a LEAP Emergency Financial Assistance Application

You may request an Internal Review of your Application for LEAP Emergency Financial Assistance if you disagree with the denial of your Application. A request for a review of your Application can only be made if your Application has been denied. An Internal review cannot be completed for an increase in granted funds. Your request must be made **within 10 days** of your being notified of the denial. You can request an Internal Review by completing the attached Internal Review Form or by written request to the location where the original application was processed. At a minimum, you must provide the following (either in the letter or the Internal Review Form):

- * A statement regarding why you think the decision should be reconsidered or was incorrect.
- * Your name, date of birth, utility account number, and address
- * Signature and date

Your application will be reviewed by an agency member who was not involved in your application or the original grant decision. You will receive verbal or written confirmation informing you of the Internal Review Decision within 5 days.

Appendix G – Standard Forms

1. Application for LEAP Emergency Financial Assistance
2. Consent to Disclosure of Personal Information
3. Payment Remittance Form
4. Request for Internal Review of Application

Application for LEAP Emergency Financial Assistance

Agency Name: _____

The information collected here is for our internal use only. All information collected is considered confidential and will not be discussed with anyone outside our agency and LEAP Emergency Financial Assistance without your permission.

1. Applicant Information

Date of Application: _____ Date of Follow-Up Interview: _____

Name of Applicant: _____ Client #: _____

Date of Birth: _____ Gender: _____

Name of Co-Applicant (if applicable): _____

Address: _____
Street Address Unit/Suite City Postal Code

Phone #: (H) _____ (W) _____ Other Contact #: _____

Referral from: _____

2. Household Information

	Name	Relationship to Applicant	Date of Birth (day/month/year)	Gender
1)	_____	_____	_____	_____
2)	_____	_____	_____	_____
3)	_____	_____	_____	_____
4)	_____	_____	_____	_____
5)	_____	_____	_____	_____
6)	_____	_____	_____	_____
7)	_____	_____	_____	_____

3. Housing Information

Do you rent? or own?

Dwelling type: House High rise Low rise Social housing

Other (please specify): _____

Primary heating fuel: Electricity Natural Gas Other

Monthly rent: \$ _____ Mortgage: \$ _____

Are you interested in learning about energy conservation programs? Yes No

Are you interested in learning about [special low-income customer service rules and policies that may be available from you local distributor?](#) Yes No

4. Income Information

Employment income (pre-tax)

Verified through documentation?

Applicant: \$ _____

Other household member(s): \$ _____

Support Payments

Employment Insurance \$ _____

Ontario Works \$ _____

Ontario Disability Support Program (ODSP) \$ _____

Child Tax Benefit \$ _____

Canada Pension Plan \$ _____

Ontario Student Assistance Program (OSAP) \$ _____

Loss of Earnings (WSIB) \$ _____

Other (please specify): _____ \$ _____

Other household member's other income: \$ _____

Other (monthly): \$ _____

Total Monthly Income: \$ _____ **Total Annual Income:** \$ _____

If you are on social assistance, have you accessed the Shelter Fund or Community Start-Up and Maintenance Benefits in the last 24 months? Yes: No:

Social Assistance Worker's Name: _____

Phone Number: _____

5. Arrears & Service Provider Information

Name of Service Provider: _____

Check service provider type that applies: Utility Unit Sub-Metering Provider

If Unit Sub-Metering Provider, name of Utility that serves applicant's building:

Account Number: _____

Amount of arrears: \$ _____ Verified by service provider?:

Do the arrears include a security deposit, reconnection fee, equipment rental and/or financing charges?

Yes: Amount: \$ _____ No:

Reason(s) for current arrears & request for assistance:

High heating costs

Job loss

Illness

Pending EI

Marital breakdown

Other (provide details): _____

Grant requested: \$ _____

Has the applicant spoken to Service Provider about arrears? Yes No

If yes, what was the result of the discussion(s)? (provide details): _____

Details on Disconnection notice (if applicable): _____

Scheduled date of disconnection (if applicable): _____

Last payments made on the account: Date: _____ Amount: \$ _____

Date of last contact with Service Provider: _____

Payment Arrangements (provide details): _____

Has the client received a LEAP grant before? Yes: When: _____ No:

6. Recommendation

Grant: Yes Amount: \$ _____ Criteria have been met

No If no, please give rationale (check all that apply):

- Does not meet income criteria
- No attempt to contact utility provider
- Cannot maintain housing
- No attempt at recent payment
- Does not live at address of arrears
- Not a customer of a service provider
- Other (please specify): _____

7. Referrals Made to Other Services

Check all that apply:

- Food Bank
- OW / ODSP
- Other in-agency resources
- Service provider customer service measures
- Energy conservation programs
- Other (please list): _____
- Employment Resources
- Baby Needs
- Housing services
- Clothing

8. Service Agreement

I, the undersigned, affirm the information provided is true. I acknowledge that should any information provided be found not to be true, I will not be eligible for LEAP Emergency Financial Assistance. I understand that payment of funds is not guaranteed, even if preliminary approval is granted. If my bill is in excess of the LEAP Emergency Financial Assistance grants, I agree to make a payment arrangement with my service provider for the balance. I understand that if I fail to make payments, which I have agreed to pay directly to my service provider, my utility service may be disconnected, and I may not be eligible for future LEAP Emergency Financial Assistance. I have read, understood and agree to these conditions and requirements.

Applicant signature

Date

Worker name (please print)

Worker's signature

Consent to Disclosure of Personal Information

Pursuant to the *Personal Information Protection and Electronic Documents Act* (S.C. 2000, chapter 5, as amended) and the applicable Freedom of Information and Protection of Privacy Acts, I _____ grant my consent to _____

(insert first name, middle initial and last name)

(insert service provider name)

to disclose my personal information under the terms and conditions set out below to evaluate eligibility for the following:

- LEAP Emergency Financial Assistance
- Service Provider customer service measures
- The following energy conservation programs: _____

1. The personal information that may be disclosed is as follows:

(a) Information relating to the status of my account, number _____
(hereinafter referred to as "my account")

with _____ relating to consumption at:
(insert service provider name)

(street address)

(Unit/Suite)

(City)

(postal code)

2. The personal information may be disclosed to the following persons and/or organizations:

- (a) _____ and,
(insert name of person)
- (b) Any other representative of _____
(insert Agency name – if none insert "None")
- (c) Any other representative of _____
(insert name of energy conservation program – if none insert "None")
- (d) Any other representative of _____
(insert Social Service Agency name– if none insert "None")

3. The consent to disclose my personal information referred to above shall expire on

(insert date not less than 30 days after the date of the signature)

4. I certify that I am at least 18 years of age.

Signature of person giving consent

Witness signature

Date

Date

Please return completed form to: _____ at _____
Agency Name *Fax #*

Payment Remittance Form

AGENCY NAME:	_____
SERVICE PROVIDER:	_____
PERIOD:	_____

	CUSTOMER NAME		Account #	Grant Amount	Name of Fund	Comments <i>(if any)</i>
	Last	First				
1						
2						
3						
4						
5						

Number of customers is: ## Grant Total: \$0.00

LEAP EFA Grants to Customers of Unit Sub-Metering Providers in Utility's Service Area for the Period

(NOTE: not reflected in table above)

Number of Customers:

LEAP Grant Total:

Request for Internal Review of LEAP Emergency Financial Assistance Application

<hr/> <i>Last name</i>	<hr/> <i>First name</i>	<hr/> <i>File number (for office use only)</i>
<hr/> <i>Address (number, street, apartment number, or rural route)</i>	<hr/> <i>Date of birth (Month/Day/Year)</i>	
<hr/> <i>City/ Town</i>	<hr/> <i>Postal Code</i>	<hr/> <i>()</i> <i>Telephone number</i>
<hr/> <i>Intake worker name (if known)</i>	<hr/> <i>OW/ODSP Member ID (if applicable)</i>	

1. What was the date you were notified of the denial?

2. Why do you disagree with the decision? Provide any additional information that you think would be helpful.

You may include supporting documents. Please forward copies only.

Please sign this form and drop it off to: _____
(Name of Agency)

(Address of Agency – street address, city/town, postal code)

<hr/> Signature	<hr/> Date
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