



COVID-19 Energy Assistance Program (CEAP) COVID-19 Energy Assistance Program – Small Business (CEAP-SB)

Guidance for Utilities Implementing
CEAP & CEAP-SB
June 16, 2020

Revised:

- October 6, 2020

Purpose

- To provide OEB staff's guidance/direction on the implementation of CEAP & CEAP-SB to utilities
- This presentation has been revised to reflect changes to program eligibility criteria issued by the OEB on September 30, 2020
 - Overview of changes & implementation timelines
 - Slides 8 & 9
 - Changes/clarifications to criteria and process are in red font for ease of identification
 - Slides 10, 11, 12, 13, 19, 23, 24 and 25.

Glossary of Terms (1 of 2)

electricity charges

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

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

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

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

Glossary of Terms (2 of 2)

gas charges

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

overdue balance / overdue amount

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

CEAP

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

CEAP-SB

- CEAP SB is a specific, time-limited program to provide a one-time, on-bill credit to electricity and natural gas small business consumers who have been required to close or operate at decreased capacity as a result of the COVID-19 pandemic.
- As part of the Government of Ontario's response to the COVID-19 pandemic, the government announced \$8 million in direct support to small businesses for their energy bills.
- Each electricity distributor, unit sub-meter provider (USMP) and gas distributor (including non-rate regulated gas distributors) is provided a maximum in funding allocated to it based on number of small business customers.
 - Electricity Distributors: \$6.06M
 - USMPs: \$71,000
 - Gas Distributors: \$1.87M
 - See OEB letter dated August 7, 2020 for your utility's allotted fund
- Utilities are not allowed to recover any funds beyond the allocated amount.

Development of CEAP and CEAP-SB

- On June 16, 2020, the OEB issued a Decision and Order (CEAP Decision) which amended the licenses of all licensed electricity distributors and USMPs to support the implementation of the government's COVID-19 Energy Assistance Program (CEAP).
 - [CEAP opened to applicants on July 13, 2020.](#)
- On August 7, 2020, the OEB issues a Decision and Order (CEAP-SB Decision) which amended the licenses of all utilities to support the implementation of the COVID-19 Energy Assistance Program – Small Business (CEAP-SB).
 - [CEAP-SB opened to applicants on August 31, 2020.](#)
- On September 30, 2020, the OEB issued a Decision amending the eligibility criteria for CEAP and CEAP-SB to make the programs more accessible to customers.

Overview of Changes to CEAP and CEAP-SB

Changes applicable to both CEAP/CEAPSB:

- Customers that made at least a partial payment with respect to amounts owing from bills prior to March 17, 2020 (including accounts subject to an arrears payment agreement) will now be eligible for CEAP
 - The intent of this requirement is to ensure that customers were making good faith efforts to manage their arrears prior to the COVID emergency. Consistent with the intent of this requirement, the OEB expects utilities to check for payments between January 1 and March 17, 2020 and verify that the customer made at least partial payments within this timeframe.

Changes Applicable to CEAP Only:

- The account holder (or the account holder's spouse or common-law partner that resides in the same residence) will no longer need to be unemployed on the date they file their CEAP application form
 - This change recognizes that many customers may have returned to work as the economy has re-opened but were still impacted by the COVID emergency and need assistance in resuming regular bill payments.

Implementation of Changes:

- The requirement to process Applications within 10 business days of receipt is not in effect for the period between October 1, 2020 and October 20, 2020.
- Application forms received before September 30, 2020 that were rejected for not meeting the then applicable CEAP/CEAP-SB eligibility requirements must be re-processed by the utility, using the amended CEAP/CEAP-SB eligibility requirements, as soon as possible and not later than October 19, 2020.
- Application forms received after September 30, 2020, including applications submitted using the old application form, are to be processed against the revised eligibility criteria

Revised CEAP/CEAP-SB Implementation Timelines

Step	Date	Comment
OEB Decision and Order expanding eligibility criteria issued	September 30, 2020	<ul style="list-style-type: none"> The new conditions will take effect immediately, but in keeping with the “first come, first served” principle outlined in the OEB’s June guidance to utilities, utilities are required to review applications that were rejected for not meeting the then applicable eligibility requirements against the expanded eligibility criteria and assess whether they are now eligible for funding. Applications that are found eligible using the revised criteria shall be provided credits on their next bill. The licence requirement to process applications within 10 days is waived for applications received between October 1, 2020 and October 20, 2020.
Revised Application Forms posted on utilities’ websites & website content updated	October 16, 2020	
Processing of previously rejected applications completed	No later than October 19, 2020	Utilities are expected to complete this process as quickly as possible
Processing of applications received after September 30, 2020 started in the order they were received	Upon completion of processing previously rejected applications or October 20, 2020 whichever is earlier	The licence requirement to process applications within 10 days will be back in effect on October 20, 2020.

Eligibility for CEAP (Electricity)

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

1. Consumer must have an account with an electricity distributor or a USMP. **Only the account holder (i.e. the customer) can submit an application for the CEAP credit.**
2. **If the customer did have overdue amounts prior to March 17, 2020 in respect to electricity charges, the customer made at least partial payments on these overdue amounts.**
 - Refer to slide # 23 for details
3. As of the day of applying, customer has overdue amounts owing for electricity charges from at least two electricity bills since March 17, 2020.
 - Refer to slide # 24 for details
4. Customer or the customer's spouse / common-law partner (who must share the same address with the customer) qualified for the Canada Emergency Response Benefit (CERB) or received Employment Insurance (EI) at any point after March 17, 2020.
 - Refer to slide # 25 for details
5. Customer has not received Ontario Electricity Support Program (OESP) or Low-Income Energy Assistance Program (LEAP) grants in 2020.
 - Refer to slide # 26 for details

Eligibility for CEAP (Gas)

- Residential natural gas consumers are eligible for CEAP if they meet the following criteria:
 1. Consumer must have an account with a gas distributor. **Only the account holder (i.e. the customer) can submit an application for the CEAP credit.**
 2. **If the customer did have overdue amounts prior to March 17, 2020 in respect to gas charges, the customer made at least partial payments on these overdue amounts.**
 - Refer to slide # 23 for details
 3. As of the day of applying, customer has overdue amounts owing for gas charges from at least two gas bills since March 17, 2020.
 - Refer to slide # 24 for details
 4. Customer or the customer's spouse / common-law partner (who must share the same address with the customer) qualified for the Canada Emergency Response Benefit (CERB) or received Employment Insurance (EI) at any point after March 17, 2020.
 - Refer to slide # 25 for details
 5. Customer has not received LEAP grants in 2020.
 - Refer to slide # 26 for details

Eligibility for CEAP-SB (Electricity)

Small business or registered charity electricity consumers are:

1. For distributors, categorized in the General Service <50 kW customer class.
2. For USMPs, categorized in the relevant commercial class and consume under 150,000 kWh per year.

Small business and charitable organization electricity consumers are eligible for CEAP SB if they meet the following criteria:

1. Consumer must have an account with an electricity distributor or a USMP.
Only the account holder (i.e. the customer) can submit an application for the CEAP credit.
2. **If the customer did have overdue amounts prior to March 17, 2020 in respect to electricity charges, the customer made at least partial payments on these overdue amounts.**
 - Refer to slide # 23 for details
3. As of the day of applying, customer has overdue amounts owing for electricity charges from at least two electricity bills since March 17, 2020.
4. The business or registered charity was required to close its premises to members of the public for regular operations for at least fifteen days as a result of a government order or an inability to adapt your business or charity to comply with public health recommendations.

Eligibility for CEAP-SB (Gas)

Small business or registered charity gas consumers are categorized in the utility's relevant commercial/industrial rate class and consume under 50,000 m³ per year.

Small business and charitable organization gas consumers are eligible for CEAP-SB if they meet the following criteria:

1. Consumer must have an account with a gas distributor. **Only the account holder (i.e. the customer) can submit an application for the CEAP-SB credit.**
2. **If the customer did have overdue amounts prior to March 17, 2020 in respect to gas charges, the customer made at least partial payments on these overdue amounts.**
 - Refer to slide # 23 for details
3. As of the day of applying, customer has overdue amounts owing for electricity charges from at least two electricity bills since March 17, 2020.
4. The business or registered charity was required to close its premises to members of the public for regular operations for at least fifteen days as a result of a government order or an inability to adapt your business or charity to comply with public health recommendations.

CEAP Credit Per Customer (Electricity)

Each eligible **electricity customer** would qualify for:

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

CEAP Credit Per Customer (Gas)

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

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

CEAP-SB Credit Per Customer (Electricity)

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

If Primarily Heated with Electricity:

- CEAP-SB credit equal to the amount necessary to settle the **total overdue balance of electricity charges** or \$850, whichever is less.

If Not Primarily Heated with Electricity:

- CEAP-SB credit equal to the amount necessary to settle the **total overdue balance of electricity charges** or \$425, whichever is less.

CEAP-SB Credit Per Customer (Gas)

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

- CEAP-SB credit equal to the amount necessary to settle the total overdue balance of gas charges or \$425, whichever is less.

CEAP and CEAP-SB Application & Timelines (1 of 2)

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

CEAP and CEAP-SB Application & Timelines (2 of 2)

- Complete application to be processed within **10 business days** of receipt regardless of the method of application.
 - This provision is not in effect for the period between October 1, 2020 and October 20, 2020.
- Complete applications to be processed in the order they are received (i.e. first come, first served) regardless of the method of application.
 - An application should not be considered received until it is complete
- An application is **considered received**:
 - On the date on which it was submitted, if submitted by e-mail, online, or by phone
 - On the date received by the utility, if submitted by mail
- Utilities are not permitted to recover any amount of CEAP or CEAP SB funding provided to their customers above the amount allocated to them.
- Utility should communicate on its website when it no longer accepts applications and inform the OEB.

Record Keeping & Reporting

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

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

Overview of CEAP and CEAP-SB Application Process

- Step 1: Review applications for completeness
- Step 2: Verify account related information
 - Application form requires applicants to attest to their eligibility for CEAP and CEAP-SB. Utilities are expected to verify eligibility information that is available through the customer's account information
- Step 3: Process complete applications for eligible customers & apply credit

Step 1: Review Applications for Completeness

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

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

- 1. If the customer did have overdue amounts prior to March 17, 2020 in respect to energy charges, the customer made at least partial payments on these overdue amounts. This includes account subject to a pre-March 17, 2020 APA.**
 - The intent of this requirement is to ensure that customers were making good faith efforts to manage their arrears prior to the COVID emergency.
 - Consistent with the intent of this requirement, the OEB does not expect utilities to check for customer payments before January 1, 2020.
 - Therefore, utilities should ensure the applicant answered this question and verify that:
 - The customer made at least partial payments in 2020.

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

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

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

- A customer is not required to miss two complete payments on two separate bills to be eligible for CEAP or CEAP-SB.
- Customers are eligible where the account holder has failed to make complete payment in respect of electricity/gas charges or has been in a position of arrears for any part of at least two billing cycles since March 17, 2020 and has an overdue balance on the date of their application for CEAP.
 - If customer made partial payments towards the bill(s), customer is still eligible
 - If customer paid all electricity charges/gas charges (as applicable) but had overdue amounts relating only to non-electricity/gas charges as applicable (e.g. third party services), the customer does not qualify

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

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

Step 2: Verify Account Related Information – CEAP only (4 of 6)

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

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

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

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

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

Step 2: Verify Account Related Information – CEAP-SB only (5 of 6)

2. Small businesses and charitable organizations were required to close for 15 business days as a result of a government order or inability to adapt their business to comply with public health recommendations.

- Ensure the applicant answered this question.
 - “close” means that the small business or registered charity was unable to maintain regular operations as a result of government order or health recommendations that required them to either fully close operations, limit access to their premises or limit the services provided or available to the public.

Utility is not expected to verify eligibility or ask for proof.

Step 2: Verify Account Related Information (6 of 6)

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

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

Step 3: Process Application & Apply Credit (1 of 4)

If application is complete & applicant is eligible

Follow the steps set out in slides 22 to 28, with the following rules in mind:

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

Step 3: Process Application & Apply Credit (2 of 4)

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

Step 3: Process Application & Apply Credit – CEAP (3 of 4)

Electricity CEAP Credit

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

OR

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

Gas CEAP Credit

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

Step 3: Process Application & Apply Credit – CEAP-SB (4 of 4)

Electricity CEAP-SB Credit

- CEAP-SB credit equal to the amount necessary to settle the **total overdue balance of electricity charges** or \$850, whichever is less, if primarily heated with electricity.
- CEAP-SB credit equal to the amount necessary to settle the **total overdue balance of electricity charges** or \$425, whichever is less, if not primarily heated with electricity.

Gas CEAP-SB Credit

- CEAP-SB credit equal to the amount necessary to settle the total overdue balance of gas charges or \$425, whichever is less.

CEAP Q & A (1 of 2)

Question

Answer

What is the household income level requirements for CEAP?

Eligibility is not tied to income level.

Can eligible customers apply for both electricity and gas CEAP credit?

Yes.

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

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

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

Can eligible customers receive the CEAP credit more than once?

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

CEAP Q & A (2 of 2)

Question

Answer

How does CEAP work with OESP and LEAP?

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

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

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

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

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

CEAP-SB Q & A

Question

Answer

Can eligible customers apply for both electricity and natural gas CEAP-SB credits?

Yes.

Can a small business with multiple storefront apply for each location?

No. A small business with multiple storefronts would be eligible for the same amount as a business that has a single metered location.

Can eligible customers receive the CEAP-SB credit more than once?

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