

From: "Mary Todorow (ACTO)" <mtodorom@lao.on.ca>
To: "Sarah Blackstock (ISAC)" <sblackstocks@lao.on.ca>, 'Keith Stewart' <keith@torontoenvironment.org>, "Theresa McClenaghan (CELA)" <mcclenat@lao.on.ca>, "Jacquie Chic (ISAC)" <chicj@lao.on.ca>, "Kathy Laird (ACTO)" <lairdk@lao.on.ca>
Cc: "Theresa McClenaghan" <mcclenaghan@execulink.com>, "jsimon@indecocom" <jsimon@indecocom>, "rbunker@indecocom" <rbunker@indecocom>
Subject: RE: Recommendation re: mandatory exemption for consumer security
Date: Wed, 14 Apr 2004 11:11:45 -0400

Sarah: The afternoon of April 23rd is the next scheduled TAG meeting, so I did not put this down as an available date - but I should be able to scoot out of the TAG meeting early to attend this meeting with Marion Fraser and Gurpreet. We should definitely meet beforehand to discuss a draft agenda - which we should send on to Marion and Gurpreet - and who will be speaking to what agenda items.

-----Original Message-----

From: Sarah Blackstock (ISAC)
Sent: Wednesday, April 14, 2004 9:10 AM
To: 'Keith Stewart'; Sarah Blackstock (ISAC); Theresa McClenaghan (CELA); Jacquie Chic (ISAC); Kathy Laird (ACTO)
Cc: Mary Todorow (ACTO); 'Theresa McClenaghan'; jsimon@indecocom; rbunker@indecocom
Subject: RE: Recommendation re: mandatory exemption for consumer security
Importance: High

Hi all:

Below is a message I received from Pupatello's policy adviser. Let me know who's going to attend. Perhaps we should also meet to discuss how we want to format the meeting.

-Sarah

Hi Sara,
Marion and I would be happy to meet April 23rd from 4-5 PM at my address.
See you soon.
Gurpreet S. Malhotra,
Senior Policy Advisor
Office of the Minister of Community and Social Services/
Minister Responsible for Women's Issues
6th Floor - Hepburn Block,
80 Grosvenor Street, Toronto, ON M7A 1E9
Tel: (416) 325-0115 Fax: (416) 325-1498

Sarah Blackstock
Research and Policy Analyst
Income Security Advocacy Centre
425 Adelaide St. W, 5th floor, Toronto, Ont. M5C 3C1
Phone: 416--597-5820 ext 5150

Toll free: 1-866-245-4072
Fax: 416-597-5821
www.incomesecurity.org

-----Original Message-----

From: Keith Stewart [mailto:keith@torontoenvironment.org]
Sent: Thursday, April 08, 2004 2:22 PM
To: Sarah Blackstock (ISAC); Theresa McClenaghan (CELA)
Cc: Mary Todorow (ACTO); 'Theresa McClenaghan'; jsimon@indec.com;
rbunker@indec.com
Subject: RE: Recommendation re: mandatory exemption for consumer
security

Yes to all of the times below - Keith

-----Original Message-----

From: Sarah Blackstock (ISAC) [mailto:blackstocks@lao.on.ca]
Sent: Thursday, April 08, 2004 2:11 PM
To: Theresa McClenaghan (CELA); Sarah Blackstock (ISAC)
Cc: Mary Todorow (ACTO); 'Theresa McClenaghan'; jsimon@indec.com;
keith@torontoenvironment.org; rbunker@indec.com
Subject: RE: Recommendation re: mandatory exemption for consumer
security
Importance: High

Please let me know your availability on these dates:

April 21, 4 pm - Yes
April 21, 2 pm - Yes
April 23, 10 am -Yes
April 23, 11 am - Yes
April 23, 4 pm -Yes
April 26, 10 am -yes

Gurpreet says they want to do a meeting with the policy wonks before we
meet
with the Ministers.

-Sarah

Sarah Blackstock
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-----Original Message-----

From: Theresa McClenaghan [CELA] [mailto:mcclenat@lao.on.ca]

Sent: Thursday, April 08, 2004 1:56 PM
To: Sarah Blackstock (ISAC)
Cc: Mary Todorow (ACTO); 'Theresa McClenaghan'; jsimon@indec.com;
keith@torontoenvironment.org; rbunker@indec.com
Subject: RE: Recommendation re: mandatory exemption for consumer
security

On Thursday, April 08, 2004 1:53 PM, Sarah Blackstock (ISAC) wrote:

>
>Date: Thu, 8 Apr 2004 13:53:43 -0400
>From: Sarah Blackstock (ISAC)
>To: "Theresa McClenaghan (CELA)" <mcclenat@lao.on.ca>,
>Subject: RE: Recommendation re: mandatory exemption for consumer
security

>
>Keith is not available on the 20th, so I'll pursue a couple other dates
>since it's probably key to have TEA representation.

>
>-Sarah

>
>Sarah Blackstock
>Research and Policy Analyst
>Income Security Advocacy Centre
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>Fax: 416-597-5821
>www.incomesecurity.org

>
>
>
>-----Original Message-----

>From: Theresa McClenaghan [CELA] [mailto:mcclenat@lao.on.ca]
>Sent: Thursday, April 08, 2004 1:08 PM
>To: Sarah Blackstock (ISAC)
>Cc: Mary Todorow (ACTO); 'Theresa McClenaghan'; jsimon@indec.com;
>keith@torontoenvironment.org; rbunker@indec.com
>Subject: RE: Recommendation re: mandatory exemption for consumer
>security

>
>
>Sarah et al, I am available and have it diarized pending further
>arrangements. Theresa.

>
>On Thursday, April 08, 2004 12:41 PM, Sarah Blackstock (ISAC) wrote:

>>
>>Date: Thu, 8 Apr 2004 12:41:59 -0400
>>From: Sarah Blackstock (ISAC)
>>To: 'Theresa McClenaghan' <mcclenaghan@execulink.com>,
>>Subject: RE: Recommendation re: mandatory exemption for consumer
>security

>>
>>Hi all:

>>
>>I just got a message from Gurpreet Malhotra, the senior policy analyst

>>in Pupatello's office. He is in touch with Marion Fraser and wants to
>>know if we're available to meet April 20 at 10 am in Pupatello's
>office.
>>From what I gather from his message, however, he was suggesting a
>>meeting with himself and Marion Fraser - not the ministers. I'll
follow
>>up with him about this detail. In the meantime, please let me know if
>>you're available and I'll get back to him.
>>
>>-Sarah
>>Sarah Blackstock
>>Research and Policy Analyst
>>Income Security Advocacy Centre
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>>Toll free: 1-866-245-4072
>>Fax: 416-597-5821
>>www.incomesecurity.org
>>
>>
>>
>>-----Original Message-----
>>From: Theresa McClenaghan [mailto:mcclenaghan@execulink.com]
>>Sent: Wednesday, April 07, 2004 9:46 PM
>>To: Mary Todorow (ACTO); rbunker@indec.com
>>Cc: Sarah Blackstock (ISAC); jsimon@indec.com;
>>keith@torontoenvironment.org; Theresa McClenaghan (CELA)
>>Subject: Re: Recommendation re: mandatory exemption for consumer
>>security deposits
>>
>>
>>Hello everyone. Thanks to all of you for all of your excellent work.
>>I've
>>reviewed all of the comments and all of the changes and CELA is ready
>to
>>sign off on the report based on all of the items that Reagan has
>>indicated
>>will be changed. I'm in my office in Toronto tomorrow; will follow up
>>with
>>Marion re a meeting with the Ministers and let you know what I find
>out;
>>maybe Sarah can do the same. Theresa.
>>Theresa McClenaghan, Counsel,
>>Canadian Environmental Law Association
>>New Street Address as of October 1, 2002
>>301-130 Spadina Ave., Toronto, ON M5V 2L4
>>No changes to phone and fax:
>>T:416-960-2284 ext.218 F:416-960-9392
>>mcclenat@lao.on.ca
>>
>>Home office email mcclenaghan@execulink.com
>>Home office telephone 519-442-1589
>>
>>CELA's Library website: www.ecolawinfo.org
>>
>>

>>Confidentiality Note: This message may
>>be subject to solicitor - client privilege.
>>If you have received this message in error,
>>please let me know by reply email, and
>>delete your copy. Thank you.

>>

>>----- Original Message -----

>>From: <rbunker@indec.com>

>>To: "Mary Todorow (ACTO)" <todorom@lao.on.ca>

>>Cc: "Sarah Blackstock (ISAC)" <blackstocks@lao.on.ca>;

>><jsimon@indec.com>;

>><keith@torontoenvironment.org>; <mcclenaghan@execulink.com>; "Theresa

>>McClenaghan (CELA)" <mcclenat@lao.on.ca>

>>Sent: Wednesday, April 07, 2004 4:20 PM

>>Subject: Re: Recommendation re: mandatory exemption for consumer

>>security

>>deposits

>>

>>

>>>

>>>

>>>

>>>

>>>

>>> Hi Mary,

>>>

>>> Thanks for this additional information. We will change the wording
of

>>the

>>> recommendation to be that of your first sentence. The rest of it

>>(from

>>> "currently " onwards) we will put as a footnote.

>>>

>>> We will add some of the examples in your literature review, where we

>>can,

>>> to section 3.4.

>>>

>>> Thanks!

>>> Raegan

>>>

>>>

>>>

>>>

>>> "Mary Todorow

>>> (ACTO)"

>>> <todorom@lao.on.ca>

>>To

>>> a> "Theresa McClenaghan (CELA)"

>>> <mcclenat@lao.on.ca>,

>>> 07/04/2004 04:09 "mcclenaghan@execulink.com"

>>> PM <mcclenaghan@execulink.com>

>>>

>>cc

>>> "Sarah Blackstock (ISAC)"

>>> <blackstocks@lao.on.ca>,

>>>

>>"keith@torontoenvironment.org"
>>>
><keith@torontoenvironment.org>,
>>> "jsimon@indeco.com"
>>> <jsimon@indeco.com>,
>>> "rbunker@indeco.com"
>>> <rbunker@indeco.com>
>>>
>>Subject
>>> Recommendation re: manadatory
>>> exemption for consumer
>security
>>dep
>>> osits
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>>>
>>> You'll recall that the \$2 million energy assistance fund announced
on
>>March
>>> 29th is for one-time emergency assistance to deal with payment of
>>energy
>>> utility arrears, SECURITY DEPOSITS [my emphasis] and reconnection
>>fees.
>>>
>>> Under recommendations for immediate term programs:
>>>
>>> * There should be a mandatory exemption for low-income
>>> households from
>>> consumer security deposit requirements which can adversely impact,
or
>>even
>>> exclude these households from accessing electricity service.
>>Currently,
>>> local distribution companies have the discretionary authority to
>waive
>>> security deposit requirements for a customer or future customer.
>>(under
>>> clause z.4 in section 88(1) of the Ontario Energy Board Act, 1998,
>the
>>> government has regulation-making authority with respect to the
amount
>>> charged by distributors for consumer security deposits and can
>require
>>> distributors to refund all or part of security deposits charged
after
>>> November 25, 2002).
>>>
>>>

>>>
>>> If you need more explanation/background to the recommendation -
>>>
>>> Excerpt from November 21, 2002 letter to then-Energy Minister Baird
>>and
>>OEB
>>> Chair Laughren:
>>>
>>> Numerous jurisdictions in the United States prohibit utilities from
>>> requiring security deposits from all or certain classes of
>residential
>>> utility consumers. In Massachusetts, gas or electric utility
>>companies
>>> subject to the jurisdiction of the Department of Public Utilities
are
>>not
>>> permitted to require a security deposit from residential customers
in
>>> advance of, or as a condition to, new or continued service.
>>>
>>> Other states have limited the ability of utilities companies to
>>require a
>>> security deposit. In Connecticut, gas and electric companies may
not
>>> require a security deposit if a customer is unable to pay, e.g. on
>>public
>>> assistance, only receives income from social security, veteran's
>>> administration or unemployment compensation benefits, under 125% of
>>the
>>> poverty level, or at risk of lack of necessities for self or
>dependent
>>> children in household. Utilities in Michigan do not require
deposits
>>of
>>> new, old or current customers if the department of social services
is
>>> responsible for payments.
>>>
>>> In the state of New York, the Fair Home Energy Practices Act
>prohibits
>>> utilities from imposing security deposit requirements on recipients
>of
>>> public assistance, supplemental security income or additional State
>>> payments. In addition, utilities cannot demand or hold a security
>>deposit
>>> from persons 62 years of age or older unless the customer has had
>>service
>>> terminated by the utility for nonpayment of bills within the
>preceding
>>six
>>> months.
>>>
>>> Excerpt from July 10, 2003 VECC submission to OEB's written hearing
>on
>>> consumer security deposit policies:
>>>

>>>
>>> Residential customers do not present the greatest non-payment risk
to
>>LDCs
>>>
>>> The Board has recognised that the residential customer rate class
>does
>>not
>>> post the greatest degree of non-payment risk, as acknowledged in its
>>June
>>> 10, 2003 Notice of Proceeding: "...large customers (> 50 kW),
>>representing
>>> the greatest degree of non-payment risk, would have their deposit
>>refunded
>>> after 7 years of GPH".
>>>
>>> We also note that research on payment patterns of utility customers
>>> indicates that residential consumers tend to pay their utility bills
>>before
>>> paying nearly any other obligation, other than rent or mortgage.
>This
>>> supports the argument that distributors may exempt a certain portion
>>of
>>> residential customers, without undue financial risk or risk of being
>>held
>>> imprudent by the Board. The Board, in its August 14, 2002 letter
>>> reiterated
>>> that LDCs "are not intended to be held generally accountable or at
>>risk
>>for
>>> uncollected commodity costs from consumers."
>>>
>>>
>>>
>>> The overall impact of paying higher utility costs is much greater
>upon
>>> lower
>>> income residential consumers than any other class of consumers. The
>>demand
>>> for utilities by residential consumers is virtually inelastic. A
>>consumer's
>>> dependence upon these utilities is such that the consumer will
>>continue to
>>> demand almost the same amount of service even if the price
increases.
>>> Residential consumers who are also poor have an even more inelastic
>>demand,
>>> being less able to choose between alternate suppliers of electricity
>>than
>>> any other class of consumers.
>>>
>>> Statistics confirm this assertion. A recent Statistics Canada
>>analysis of
>>> the widening gap between rich and poor Canadians strongly suggests
>the
>>> difficulties low-income families, who would not qualify for social

>>> assistance utility supports would face in having to pay a security
>>deposit.
>>> The typical low-income family in 1999 had only \$300 in savings to
>>protect
>>> it
>>> against unexpected financial hardships.
>>>
>>> In 1999, the lowest household income quintile (those earning less
>than
>>> \$20,520 per year) in Canada, spent, on average, more than twice the
>>amount
>>> of their income on utilities (water, fuel and electricity) than the
>>highest
>>> income quintile (those earning \$79,964 and over).
>>>
>>>
>>>
>>> Conclusion
>>>
>>> VECC recognizes that the rationale for applying a security deposit
by
>>a
>>> utility is to protect a utility from those customers who fail to pay
>>their
>>> bills and protect other ratepayers who would be required to make up
>>the
>>> loss
>>> of revenue from non-paying customers. This argument, however, must
>be
>>> weighed against other, equally compelling arguments. These include
>>the
>>> actual financial capability of low and fixed income residential
>>consumers
>>> to
>>> meet the obligation represented by a security deposit, the
relatively
>>low
>>> level of financial risk that would be posed by exempting consumers
>who
>>met
>>> the required definition of low-income, and the ultimate impact of
the
>>> inability to access electrical service by residential consumers.
>>>
>>>
>>> Mary Todorow
>>> Policy Analyst
>>> Advocacy Centre for Tenants Ontario (ACTO)
>>> 425 Adelaide St. West, 5th floor
>>> Toronto, Ont M5V 3C1
>>> (Tel) 416-597-5855, ext 5173
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>>> (E-mail) todorom@lao.on.ca
>>>
>>>

>>>

>>

>

>

>

>

>Theresa McClenaghan

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>

Absolutely, thanks. Theresa

Theresa McClenaghan

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From: "Mary Todorow (ACTO)" <todorom@lao.on.ca>
To: 'Keith Stewart' <keith@torontoenvironment.org>, Edward Gale
<edegale@sharethewarmth.org>, "Sarah Blackstock (ISAC)"
<blackstocks@lao.on.ca>, 'Michael Shapcott'
<michael.shapcott@utoronto.ca>, "Sarah Blackstock (ISAC)"
<blackstocks@lao.on.ca>, "Theresa McClenaghan (CELA)"
<mcclenat@lao.on.ca>, jcampey@cspc.toronto.on.ca, "Sarah Miller (CELA)"
<millers@lao.on.ca>, rbunker@indeco.com, "Mary Todorow (ACTO)"
<todorom@lao.on.ca>, Carolyn Lovas <clovas@sharethewarmth.org>,
Cris Ingravalle <cingravalle@sharethewarmth.org>
Subject: RE: Next LIEN meeting?
Date: Wed, 14 Apr 2004 11:11:40 -0400

I'm available on:

Monday, Apr. 26 - afternoon
Tues, Apr. 27 - anytime
Wed., Apr. 28 - morning
Thurs., Apr. 29 - anytime

-----Original Message-----

From: Keith Stewart [mailto:keith@torontoenvironment.org]
Sent: Thursday, April 08, 2004 2:17 PM
To: Edward deGale; blackstocks@lao.on.ca; 'Michael Shapcott'; Sarah Blackstock (ISAC); Theresa McClenaghan (CELA); jcampey@cspc.toronto.on.ca; Sarah Miller (CELA); rbunker@indeco.com; Mary Todorow (ACTO); Carolyn Lovas; Cris Ingravalle
Subject: Next LIEN meeting?

LIEN-ers:

The Indeco report (attached) is completed and on its way to the Minister's offices, with a request for a meeting. Thanks to Advocacy Centre for Tenants Ontario, Income Security Advocacy Centre, Green Communities Association, Public Interest Advocacy Centre and Enbridge for comments, and to Raegan et al. for pulling it off on such a tight timeline. TEA and CELA (plus other interested parties?) are planning to do a media release on the report next Wednesday (no press conference, just a release but we'll make sure the interested reporters get it). We'll also post the report to our web sites. We will hopefully meet with the Ministers or their staff very soon.

I'd like to propose that we set a date for our next LIEN meeting so we can plan next steps, and that we invite the broader interested community (including everyone who signed on to the press release) to that meeting.

Hopefully, we would be able to discuss:

- reaction from the Ministers to the Indeco report;
- what Minister Duncan announces on April 15 in his speech to the Empire Club re. the future of the electricity system;
- related updates / gossip on what's happening on this file;
- next steps in the campaign.

To give us time to get a better sense of where the province is going and

give potential new members advance notice, I'd suggest the week of April
26. Waddya think?

Keith

Keith Stewart, Ph.D.
Smog and Climate Change Campaigner
Toronto Environmental Alliance
30 Duncan St., Suite 201
Toronto, Ontario M5V-2C3
tel. 416-596-0660
fax 416-596-0345
e-mail: <<mailto:keith@torontoenvironment.org>>
keith@torontoenvironment.org
webpage: <<http://www.torontoenvironment.org/>>
www.torontoenvironment.org

From: "Sarah Blackstock (ISAC)" <blackstocks@lao.on.ca>
To: "Theresa McClenaghan (CELA)" <mcclenat@lao.on.ca>, "Sarah Blackstock (ISAC)" <blackstocks@lao.on.ca>, "Mary Todorow (ACTO)" <todorom@lao.on.ca>
Subject: RE: (fwd) Final report attached
Date: Wed, 14 Apr 2004 11:05:54 -0400

Hi Theresa:

ISAC is happy to be quoted in the press release. Perhaps something stressing that low-income families are already struggling to make ends meet and that it's essential for government to take action to ensure low-income families continue to have access to electricity, which is essential to ensuring adequate heat and food preparation.

-Sarah

Sarah Blackstock
Research and Policy Analyst
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-----Original Message-----

From: Theresa McClenaghan [CELA] [mailto:mcclenat@lao.on.ca]
Sent: Thursday, April 08, 2004 1:59 PM
To: blackss@lao.on.ca; todorom@lao.on.ca
Subject: (fwd) Final report attached

Mary and Sarah here is the report. We are in the process of sending it

to the two Ministers this afternoon and repeating our request for a meeting. That does not preclude a meeting with their senior staff. In the meantime I have just discussed with Keith that we will do a media release next Wednesday and will also post it to our respective web sites.

Do ISAC or ACTO want to be quoted in the press release or mentioned as contact info or not mentioned at all? I will work on it on Tuesday.
Thanks. Theresa.

Hi Keith and Theresa,

Please find attached the final report Low income energy conservation and assistance, in Adobe Acrobat pdf format. Please let me know if you have any problems with the attached file.

I think the report has turned out wonderfully and I look forward to

hearing the outcomes of the upcoming meetings with the two ministries.
Thank you both for the opportunity to work on this project. We very much
enjoyed it.

Cheers,
Raegan

(See attached file: Low income energy conservation & assistance.pdf)

Theresa McClenaghan
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Date: Wed, 14 Apr 2004 14:54:56 -0400
From: Theresa McClenaghan [C LA] <mcclenat@lao.on.ca>
To: blackstocks@lao.on.ca, keith@torontoenvironment.org, millers@lao.on.ca,
todorom@lao.on.ca
cc: Fe de Leon <deleonf@lao.on.ca>, jsimon@indec.com, mcclenat@lao.on.ca,
rbunker@indec.com, Sharon Fleishman <fleishms@lao.on.ca>
Subject: cc: draft press release re low income report

All, Attached with apologies for the delay is the draft press release for
your review and approval/ suggestions, amendments. Thanks. Theresa

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To: mpickering@tafund.org
Cc: "Theresa McClenaghan" <mcclenat@lao.on.ca>, lenaghan@execulink.com>, rbunker@indeco.com

Subject: Fw: Meeting - Apr16, 3:00 - funding for CELA work on low income households and DSM

Sensitivity:

From: Judy Simon <JSimon@indeco.com>

Date: Tue, 13 Apr 2004 12:32:46 -0400

L19N

Mary,

Here is the final report on low income energy conservation and assistance CELA submitted on April 8th on behalf of TEA to the Ministers of Energy and Community and Social Services regarding a strategy for low income energy conservation and assistance. As discussed with you last week, we are hoping to meet with you on Friday, April 16th, to talk about TAF's interest in providing funding to allow us to expand upon the research and recommendations in this work. We would hope to submit an application to TAF on April 22nd should there be sufficient interest from TAF.

Please confirm the meeting on the 16th, including where you would like to meet.

Looking forward to meeting you.

Judy

----- Forwarded by Judy Simon/IndEco on 04/13/2004 12:32 PM -----

Judy Simon/IndEco

04/06/2004 05:30 PM

To
mpickering@tafund.org

cc
rbunker@indeco.com@IndEco, Theresa McClenaghan [CELA]
<mcclenat@lao.on.ca>, "Theresa McClenaghan" <mcclenaghan@execulink.com>

Subject
Meeting - Apr16, 3:00 - funding for CELA work on low income households and DSM

Mary,

It was great to chat with you this afternoon. I really appreciate the get acquainted call and am looking forward to working with you on TAF.

Below I have attached for your information CELA's fall 2003 submission to the OEB regarding the need for DSM programs specifically targeted at low income consumers. As mentioned to you, TEA, represented by CELA, is preparing a report which builds on this submission and which responds directly to the Minister of Energy's request to CELA to provide recommendations before April 15th on what can be done to address low income consumer needs immediately - to deal with the price hike effective April 1st. I will send you a copy of this report when it becomes available.

It would be great if CELA could meet with you next week to discuss a possible submission that CELA could make for funding to TAF due April 22nd to build on the past work on an energy efficiency strategy for low income consumers. How about meeting on April 16th at 3:00 p.m. at your office or at a place more convenient for you? Theresa McClenaghan of CELA as well as Raegan Bunker and myself from IndEco will attend.

I look forward to meeting you.

Judy

Judy Simon
Vice-President
IndEco Strategic Consulting Inc.
2 Pardee Avenue #302
Toronto, ON M6K 3H5 Canada

Tel: 416 532-4333 x 207
Fax: 416 532-5485

When you open this file it will open to the report, but if you press the back button in Word you will find CELA's submission which sets recommendations in a letter to the OEB based on the report, which can be found on pages before page 1, eg. page iii. We don't know why this has happened and do not yet know how to fix this problem. Please let me know if you are having trouble locating the letter and we will try to send it to you another way.

To: Theresa McClenaghan [CELA] <mcclenat@lao.on.ca>
Cc: rbunker@indec0.com
Subject: feedback from Marion on our paper
Sensitivity:
From: Judy Simon <JSimon@indec0.com>
Date: Tue, 13 Apr 2004 14:46:39 -0400

----- Forwarded by Judy Simon/IndEco on 04/13/2004 02:52 PM -----

"Fraser, Marion (ENERGY)" <Marion.Fraser@energy.gov.on.ca>

04/13/2004 02:50 PM

To
"Judy Simon (E-mail)" <JSimon@indec0.com>

cc

Subject
Paper

Judy - just got a copy of your paper on the low income thing - it is great.

By the way, how did you send it in? I got it through a rather strange route. For future reference, always be sure a mininster's ea or senior policy person gets a copy, or else it automatically joins the regular routing of correspondence.

Regards, Marion

Marion Fraser
Senior Policy Advisor
Office of the Honourable Dwight Duncan, Minister of Energy
4th Floor Hearst Block
900 Bay Street
Toronto, Ontario, M7A 2E1
416 327-3373
marion.fraser@energy.gov.on.ca

Date: Tue, 13 Apr 2004 16:12:54 -0400
From: Mary Pickering <mpickering@tafund.org>
User-Agent: Mozilla/5.0 (Windows; U; Win98; en-US; rv:1.6) Gecko/20040113
To: "Theresa McClenaghan [CELA]" <mcclenat@lao.on.ca>
CC: Judy Simon <JSimon@indeco.com>, Theresa McClenaghan <mcclenaghan@execulink.com>, rbunker@indeco.com
Subject: Re: cc: re: Fw: Meeting - Apr16, 3:00 - funding for CELA work on low income households
References: <auto-000002625535@iclei.org>

Friday, 3 pm, TAF office - 75 Elizabeth Street, 416-392-1217.

Mary Pickering

Theresa McClenaghan [CELA] wrote:

>Judy, Mary et al, if we can determine a meeting place and confirm the
>time before 2 or 3 tomorrow (Wednesday) when I leave for Eastern Ontario,
>I would appreciate it because I won't be back in the office before Friday
>afternoon. If not, please leave a message with my assistant, Tracy
>Tucker, 416-960-2284 ext. 210 (tuckert@lao.on.ca) Thanks. Theresa
>McClenaghan

>
>On Tuesday, April 13, 2004 12:32 PM, Judy Simon wrote:

>
>
>>Date: Tue, 13 Apr 2004 12:32:46 -0400
>>From: Judy Simon
>>To: mpickering@tafund.org
>>Subject: Fw: Meeting - Apr16, 3:00 - funding for CELA work on low income households
>>

>>Mary,

>>
>>Here is the final report on low income energy conservation and
>>assistance CELA submitted on April 8th on behalf of TEA to the Ministers
>>of Energy and Community and Social Services regarding a strategy for low
>>income energy conservation and assistance. As discussed with you last
>>week, we are hoping to meet with you on Friday, April 16th, to talk
>>about TAF's interest in providing funding to allow us to expand upon the
>>research and recommendations in this work. We would hope to submit an
>>application to TAF on April 22nd should there be sufficient interest

>>
>>
>>from TAF.

>
>
>>Please confirm the meeting on the 16th, including where you would like
>>to meet.

>>
>>Looking forward to meeting you.

>>
>>Judy

>>
>>
>>----- Forwarded by Judy Simon/IndEco on 04/13/2004 12:32 PM -----

>>
>>Judy Simon/IndEco
>>
>>
>>04/06/2004 05:30 PM
>>
>>To
>>mpickering@tafund.org
>>
>>cc
>>rbunker@indeco.com@IndEco, Theresa McClenaghan [CELA]
>><mcclenat@lao.on.ca>, "Theresa McClenaghan" <mcclenaghan@execulink.com>
>>
>>Subject
>>Meeting - Apr16, 3:00 - funding for CELA work on low income households
>>and DSM
>>
>>
>>
>>
>>
>>
>>Mary,
>>
>>It was great to chat with you this afternoon. I really appreciate the
>>get acquainted call and am looking forward to working with you on TAF.
>>
>>Below I have attached for your information CELA's fall 2003 submission
>>to the OEB regarding the need for DSM programs specifically targeted at
>>low income consumers. As mentioned to you, TEA, represented by CELA, is
>>preparing a report which builds on this submission and which responds
>>directly to the Minister of Energy's request to CELA to provide
>>recommendations before April 15th on what can be done to address low
>>income consumer needs immediately - to deal with the price hike
>>effective April 1st. I will send you a copy of this report when it
>>becomes available.
>>
>>It would be great if CELA could meet with you next week to discuss a
>>possible submission that CELA could make for funding to TAF due April
>>22nd to build on the past work on an energy efficiency strategy for low
>>income consumers. How about meeting on April 16th at 3:00 p.m. at your
>>office or at a place more convenient for you? Theresa McClenaghan of
>>CELA as well as Raegan Bunker and myself from IndEco will attend.
>>
>>I look forward to meeting you.
>>
>>Judy
>>
>>-----
>>Judy Simon
>>Vice-President
>>IndEco Strategic Consulting Inc.
>>2 Pardee Avenue #302
>>Toronto, ON M6K 3H5 Canada
>>
>>Tel: 416 532-4333 x 207

>>Fax: 416 532-5485

>>

>>

>> When you open this file it will open to the report, but if you press
>>the back button in Word you will find CELA's submission which sets
>>recommendations in a letter to the OEB based on the report, which can be
>>found on pages before page 1, eg. page iii. We don't know why this has
>>happened and do not yet know how to fix this problem. Please let me
>>know if you are having trouble locating the letter and we will try to
>>send it to you another way.

>>

>>

>>

>

>

>

>

>Theresa McClenaghan

>Canadian Environmental Law Association

>130 Spadina Ave. Suite 301

>Toronto, ON

>M5V 2L4

>

>Tel 416-960-2284

>Fax 416-960-9392

>www.cela.ca

>

>mcclenat@lao.on.ca

>

>home office email mcclenaghan@execulink.com

>

>

>

>

>

Reducing low income energy burden in Ontario

File
L19N

What do we want to achieve?

- Reduce low income energy burden (i.e. percent of household income devoted to energy costs).

Possible approaches

Short-term/interim

- Charge them less for electricity
 - e.g. different electricity rate; discount on electricity rate; flat subsidy applied to their bill each month/year;
- Increase their income
 - e.g. tax credit; rebate
- Exempt LI consumers from utility security deposit requirement

Medium-to-long term/sustainable

- Reduce/change their energy consumption patterns
 - e.g. energy efficiency upgrades (appliances, building envelope etc); fuel switching

Draft proposed approach

An interim/short-term program, such as rebate, will help low-income households absorb the higher cost of power after the rate increase on April 1, 2004.

However, it is critical that a province-wide comprehensive low-income energy conservation strategy, that aims to make low income housing more energy efficient, be developed. A low-income energy conservation strategy will be the most cost-effective and sustainable method over the long term for reducing the low income energy burden. The strategy should be developed in consultation with low-income consumers and advocacy organizations across Ontario.

Considerations for comparing alternative programs/approaches

Short-term programs/approaches

- Administration costs
- How soon can it be implemented?
- Can it be "piggy-backed" on existing program?
- Inclusiveness – will it reach all LI households?
- Will the program/approach work for all different types of LI households (e.g. tenants vs owners; those who pay utilities vs those with all inclusive rents; Multi-residential vs single family homes; families vs singles).
- When would customers receive assistance?

Medium-to-longer term programs/approaches

- Administration costs
- Sustainability over the long-term
- Inclusiveness – will it reach all LI households?

- Will the program/approach work for all different types of LI households (e.g. tenants vs owners; those who pay utilities vs those with all inclusive rents; Multi-residential vs single homes; families vs singles).

Draft principles/aspects of a low income energy conservation strategy

- **No capital outlay** required for LI participation in energy efficiency upgrade programs. Program to be paid either as direct subsidy to LI consumers or through energy savings on their utility bills.
- **Comprehensive** – should include appliances, building envelopes, heating systems (efficiency & fuel switching), cooling for seniors and other vulnerable groups
- **Eligibility** – needs to be clear, simple screening process for identifying eligible participants
- Gas and electric utilities should be encouraged to cooperatively/jointly deliver low income ee programs

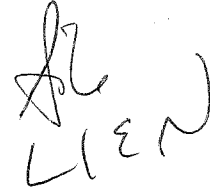
From: "Keith Stewart" <keith@torontoenvironment.org>
To: "Theresa McClenaghan \ (E- mail)" <mcclenat@lao.on.ca>
Subject: FW: Low Income Energy Conservation and Assistance report
Date: Thu, 8 Apr 2004 16:34:47 -0400
Importance: Normal

Interesting - Rob Silver has the Energy file in the Premier's office (I also sent it to Dave Harvey - Environment guy in the Premier's office and Lois Corbett at MOE).

Keith

-----Original Message-----

From: Silver, Robert (OPO) [mailto:Robert.Silver@opo.gov.on.ca]
Sent: Thursday, April 08, 2004 4:11 PM
To: 'Keith Stewart'
Subject: RE: Low Income Energy Conservation and Assistance report



Thanks Keith - this is actually very timely. I'll give it a read over the weekend.

-----Original Message-----

From: Keith Stewart [mailto:keith@torontoenvironment.org]
Sent: Thursday, April 08, 2004 2:53 PM
To: Lois Corbett; Robert Silver (OPO); David Harvey (OPO)
Subject: Low Income Energy Conservation and Assistance report

Rob, Dave and Lois:

Please find attached the Low Income Energy Conservation and Assistance report which is currently speeding its way towards Ministers Duncan and Papatello. It was prepared by Indeco Consulting for TEA and the Canadian Environmental Law Association, but with input from a bunch of low-income advocacy groups and enviros who know about energy conservation retrofitting.

The report comes in response to a request from Minister Duncan on what other jurisdictions are doing re. low income energy programs and is intended to help pave the way for public consultations on this topic.

Have a great weekend,

Keith

Keith Stewart, Ph.D.
Smog and Climate Change Campaigner
Toronto Environmental Alliance
30 Duncan St., Suite 201
Toronto, Ontario M5V-2C3
tel. 416-596-0660
fax 416-596-0345
e-mail: keith@torontoenvironment.org
<mailto:keith@torontoenvironment.org>
webpage: www.torontoenvironment.org <<http://www.torontoenvironment.org/>>

Date: Tue, 13 Apr 2004 15:49:46 -0400
To: muldoonp@lao.on.ca, mccloughan@execulink.com, mccloughan@lao.on.ca,
r.lindgren@sympatico.ca, nadarajr@lao.on.ca, millers@lao.on.ca
From: Kathleen Cooper <kcooper@ccla.ca>
Subject: useful perspectives here on water

Water bunch,

This "post mortem" of the well aware workshop seems quite valuable for the sake of crafting CELA input to water law and regulatory reform.

FYI with apologies if this is duplication.

KC

>X-From_: janetmcneill@nrtco.net Tue Apr 13 12:34:03 2004
>From: "Janet McNeill" <janetmcneill@nrtco.net>
>To: "Janet McNeill" <janetmcneill@nrtco.net>
>Subject: FW: Well Aware Event in Cobden
>Date: Tue, 13 Apr 2004 12:31:40 -0400
>X-Mailer: Microsoft Outlook IMO, Build 9.0.6604 (9.0.2911.0)
>Importance: Normal
>
>Hello Everyone:
>
>On behalf of the Ottawa River Institute (based in Pembroke), I recently
>coordinated two "Well Aware" community forums in Renfrew County (these are a
>joint project of the Green Communities Association and the Ontario Ground
>Water Association, as you all likely know, and feature about 5 different
>presenters talking about well construction/maintenance/septic systems/source
>protection).
>
>There was quite a bit of frustration expressed at the one held in Cobden.
>Our speaker on source protection was Ted Cooper, who was representing the
>Lake Clear Conservancy & the Bonnechere River Watershed Project (in his
>working life, Ted is an Infrastructure Planner for the City of Ottawa). Ted
>sent these comments the morning after our Cobden forum; some of you might
>find them interesting...
>*****
>
>-----Original Message-----
>From: Cooper, Ted [mailto:Ted.Cooper@ottawa.ca]
>Sent: Thursday, April 01, 2004 11:35 AM
>To: 'OGWA'; 'Janet McNeill'
>Cc: Sharyn Inward (GCA); Kellie Bonnici (GCA); 'Deborah Brooker'; David
>Neufeld (MOE); Cooper, Ted; Terry Marquardt (Earl V. Marquardt)
>Subject: RE: Well Aware in Cobden
>
>
>Hi to all:
>
>My assessment of the Cobden Workshop is the following:
>
>There were about 4 different groups who attended the meeting:
>
>The groups who were listening:
>
>1. The targeted audience - the rural landowner who wanted to get more

>informed about good stewardship / "best management practices" around the
>house on private services.

>
>2. Rural residents who have a site specific problem they are dealing with,
>who, through the circumstances that they find themselves, likely know a lot
>more about some of the workshop items than I do, being a relative newcomer
>to rural Ontario. These people are desperate because they are in a near
>impossible situation - they have a water problem that has cost them
>thousands of dollars, but the problem persists. They are attending hoping to
>hear something that gives them some information and ideas that can give them
>a little bit of hope.

>
>The groups who were there with another agenda:

>
>3. Small business operators who are very concerned about the impact the Safe
>Drinking Water Act and Ontario Regulation 170/03 will have on their
>viability to stay a-float. This group was there hoping to be able to speak
>to someone from MOE to voice their objection to the costs of complying with
>the Regulations that, while they too are concerned with Public Health and a
>secure water system, they feel that the Regulation is an over-reaction to
>the incidents at Walkerton, that threatens an entire rural lifestyle. Their
>discontent originates from a feeling that the bureaucrats at Queens Park are
>making decisions that will affect the livelihood of rural Ontario, and the
>bureaucrats not only don't understand the gravity of the situation, they
>also are indifferent to the situation - leaving the small business operator
>to sink or float.

>
>4. The "Back of Government this is Our Land" group who are annoyed because
>of perceived Government interference on issues they believe need only be
>concerns of private landowners. This group is reacting to a number of issues
>that have been smouldering - increased taxes and reduction in services
>through amalgamation of rural townships with villages/cities (one example
>being the City of Ottawa and its former rural townships), MOE
>Orders/convictions of small woodlot operators, etc. Any program that has a
>hint of government intervention on private interests is taken as another
>threat to their "property rights".

>
>
>
>I believe the people who attended from Group 1 found the workshop to be very
>informative, and therefore the Well Aware Workshop should be considered a
>success.

>
>I truly sympathize with the Group 2 attendees. I believe a lot of the
>problems that these people are getting into are the result of a reduction in
>the level of government involvement in the regulation/management of water
>resources in the Province. Some would argue that the "buyer beware"
>principle should apply, meanwhile this group of people are the victims in
>some cases of unscrupulous people in the business who have Insurance
>Companies financing the Civil litigation that the landowners are faced with
>to resolve their problems.

>
>Living in Renfrew County, I am aware how a lot of businesses are seasonal in
>nature. There are a lot of recreational businesses that provide respite for
>city folks who travel to the Valley for their summer vacation. There is no
>amount of convincing you can give me that the concerns of these folks have

>been considered in the pending regulations. I don't know what the answer is,
>but their concerns about their businesses going under are real, and the
>number of businesses that are going to be "killed" is a lot more than the
>number of rural people that have ever been "killed" by poor rural water
>quality in the Province of Ontario. I believe there is a need for the
>Province to reconsider the implementation of Regulation 170. Group 3
>attendees were at the meeting hoping someone would be there to listen to
>their concerns and that the message find its way to the Regulators at Queens
>Park.

>
>The Group 4 people are an interesting bunch. I believe that many of this
>group are unwilling or unable to admit or understand that things that they
>do on their properties could become someone else's problem to fix. This
>group has given up listening by now, and will remain vocal (a problem?) for
>many years to come. Hopefully these land owners are as good land/water
>stewards as they claim to be!

>
>
>This is my assessment of the groups attending the Cobden Well Aware
>Workshop. The workshop clearly demonstrated that water remains a big issue
>in rural Ontario - much more of an issue than in urban centres. In many
>respects it would have been worthwhile for Senior Management of MOE to hear
>the discussion at this workshop - I believe it would have added to the
>success of the evening.

>
>Ted Cooper

Kathleen Cooper, Senior Researcher
Canadian Environmental Law Association
301-130 Spadina Ave., Toronto, ON M5V 2L4
T:416-960-2284 ext.221 F:416-960-9392
kcooper@cela.ca www.cela.ca
CELA's Library website: www.ecolawinfo.org

From: "Keith Stewart" <keith@torontoenvironment.org>
To: "Edward deGale" <edegale@sharethewarmth.org>, <blackstocks@lao.on.ca>, "Michael Shapcott" <michael.shapcott@utoronto.ca>, "Sarah Blackstock \ (ISAC\)" <blackstocks@lao.on.ca>, "Theresa McClenaghan \ (CELA\)" <mcclenat@lao.on.ca>, <jcampey@cspc.toronto.on.ca>, "Sarah Miller \ (CELA\)" <millers@lao.on.ca>, <rbunker@indeco.com>, "Mary Todorow \ (ACTO\)" <todorom@lao.on.ca>, "Carolyn Lovas" <clovas@sharethewarmth.org>, "Cris Ingravalle" <cingravalle@sharethewarmth.org>
Subject: Next LIEN meeting?
Date: Thu, 8 Apr 2004 14:16:57 -0400
Importance: Normal

LIEN-ers:

The Indeco report (attached) is completed and on its way to the Minister's offices, with a request for a meeting. Thanks to Advocacy Centre for Tenants Ontario, Income Security Advocacy Centre, Green Communities Association, Public Interest Advocacy Centre and Enbridge for comments, and to Raegan et al. for pulling it off on such a tight timeline. TEA and CELA (plus other interested parties?) are planning to do a media release on the report next Wednesday (no press conference, just a release but we'll make sure the interested reporters get it). We'll also post the report to our web sites. We will hopefully meet with the Ministers or their staff very soon.

I'd like to propose that we set a date for our next LIEN meeting so we can plan next steps, and that we invite the broader interested community (including everyone who signed on to the press release) to that meeting.

Hopefully, we would be able to discuss:

- reaction from the Ministers to the Indeco report;
- what Minister Duncan announces on April 15 in his speech to the Empire Club re. the future of the electricity system;
- related updates / gossip on what's happening on this file;
- next steps in the campaign.

To give us time to get a better sense of where the province is going and give potential new members advance notice, I'd suggest the week of April 26. Waddya think?

Keith

Keith Stewart, Ph.D.
Smog and Climate Change Campaigner
Toronto Environmental Alliance
30 Duncan St., Suite 201
Toronto, Ontario M5V-2C3
tel. 416-596-0660
fax 416-596-0345
e-mail: <mailto:keith@torontoenvironment.org>
keith@torontoenvironment.org

webpage: <<http://www.torontoenvironment.org/>>
www.torontoenvironment.org

Date: Thu, 08 Apr 2004 10:32:40 -0400
To: mcclenat@lao.on.ca
From: Kathleen Cooper <kcooper@ccla.ca>
Subject: Fwd: [cleanair-l] Manley Committee stonewalls OCAA

>X-From_: cleanair-l-admin@list.web.net Thu Apr 8 09:50:57 2004
>Delivered-To: cleanair-l@list.web.ca
>From: "Ontario Clean Air Alliance" <info@cleanair.web.ca>
>To: <cleanair-l@list.web.ca>
>Organization: Ontario Clean Air Alliance
>X-Mailer: Microsoft Outlook, Build 10.0.2616
>Importance: Normal
>Subject: [cleanair-l] Manley Committee stonewalls OCAA
>Sender: cleanair-l-admin@list.web.net
>X-BeenThere: cleanair-l@list.web.net
>X-Mailman-Version: 2.0.13
>Reply-To: info@cleanair.web.ca
>List-Help: <mailto:cleanair-l-request@list.web.net?subject=help>
>List-Post: <mailto:cleanair-l@list.web.net>
>List-Subscribe: <http://list.web.net/lists/listinfo/cleanair-l>,
> <mailto:cleanair-l-request@list.web.net?subject=subscribe>
>List-Id: <cleanair-l.list.web.net>
>List-Unsubscribe: <http://list.web.net/lists/listinfo/cleanair-l>,
> <mailto:cleanair-l-request@list.web.net?subject=unsubscribe>
>List-Archive: <http://list.web.net/lists/private/cleanair-l/>
>X-Original-Date: Thu, 8 Apr 2004 09:34:29 -0400
>Date: Thu, 8 Apr 2004 09:34:29 -0400
>X-MIME-Autoconverted: from quoted-printable to 8bit by
>mail35.megamailservers.com id i38DouX7003205

>
>Despite repeated requests, the OPG Review Committee (the Manley
>Committee) has refused to provide the Ontario Clean Air Alliance (OCAA)
>with electronic copies of the economic spreadsheet models that it claims
>show that re-starting the Pickering A Unit #1 nuclear reactor is a
>lower-cost option for phasing-out coal and keeping the lights on in
>Ontario than building a high-efficiency natural gas power plant.
>
>Despite admitting in its report that its conclusions are only as good as
>the data they are based on and that it did not have sufficient time to
>fully review data provided by Ontario Power Generation (OPG), the Manley
>Committee has refused to make its data or economic models public.
>
>This means that the citizens of Ontario and energy experts have no way
>of properly reviewing the Manley Committee's conclusions. For example,
>the Manley Committee states that the restarted Pickering Unit would
>operate at an 85% capacity factor despite the fact that the average
>capacity factor of Ontario's nuclear reactors in 2002 was 54%. It also
>assumes a natural gas price significantly higher than what has been
>forecast by the U.S. Department of Energy. Why?
>
>Because the Manley Committee is treating its data as secret (unlike the
>OCAA, which has posted all of the economic models it has developed for a
>coal phase-out on its website) we cannot tell what kind of cost overrun
>scenarios would make a nuclear re-start uneconomic. (Construction of the
>Darlington Nuclear Station was 260% over budget. The Pickering A Unit

> #4 re-start was more than 175%
>
> Given the re
> fir

To: "Norm Ryckman" <Norm.Ryckman@enbridge.com>
Cc: "Cathy Hanlon" <Cathy.Hanlon@enbridge.com>, rbunker@indecoco.com,
"Susan Clinesmith" <Susan.Clinesmith@enbridge.com>
Subject: Re:Draft report on low income opportunities - comments due 11:00 am Apr 7th
Sensitivity:
From: Judy Simon <JSimon@indecoco.com>
Date: Thu, 8 Apr 2004 10:14:41 -0400
Bcc: Theresa McClenaghan [CELA] <mcclenat@lao.on.ca>

Norm,

See below where we provide explanations of the changes we made to address your comments. Thanks.

Judy

"Norm Ryckman" <Norm.Ryckman@enbridge.com>

04/07/2004 07:58 AM

To
JSimon@indecoco.com

cc
"Cathy Hanlon" <Cathy.Hanlon@enbridge.com>, "Susan Clinesmith" <Susan.Clinesmith@enbridge.com>, rbunker@indecoco.com

Subject
Re:Draft report on low income opportunities - comments due 11:00 am Apr 7th

Judy, my comments on the draft (I don't have the software to allow me to make revisions to PDF files).

Overall, I think the report is very well written - well done!

1. Summary, vi, second bullet - "through energy savings on their utility bills" - I am not clear why this would be different from today or what change you may be proposing. The change being proposed is that any low income program that would require a capital investment would be covered either through a subsidy or the payment by the utility. In the latter case, the costs would be recovered by the utility through bill savings being paid to the utility until the total cost of the payment was recovered. Elimination of the need for low income customers to pay

out money directly is essential. We have tried to explain this better in the report.

2. Summary, vi, fourth bullet (and later in the document) - if utilities are required to provide low income consumers they should be allowed to recover the costs through rates i.e., the utility should not be burdened with the costs. We have made it clear in several places in the report that utilities should be permitted to recover the costs of low income programs, including associated public education and outreach, in rates.

3. Summary vii, seventh bullet - outreach through distribution companies, e.g. bill inserts - who pays for this? Ratepayers.

4. Summary viii, first bullet - again the issue of cost recovery - when these broad statements are made we should close the loop regarding how they should be funded. as above

5. Page 2, bullet one - same point as above in my bullet 4 as above.

6. Page 18, second para - "two major obstacles" change obstacles to challenges Done

7. Page 19, first para, last sentence - be sure to verify and remove reminder wording "need to verify this" Done

8. Page 21, section 4.4, first sentence - "In addition considering" looks like it needs a "to" inserted Done

9. Page 23, sixth bullet - same as my bullet 1 as above

10. Page 23, last bullet - same as my bullet 2 - I would be inclined to end the last bullet at "... low income consumers" as some could interpret the suggestion of cooperative/ joint deliver to be supportive of a central agency approach - we still believe that the LDC model is the way to go We have made it clear that the report advocates a utility model with LDCs being accountable for DSM, with the recommendation that the delivery of low income programs should be contracted out to local community groups that deliver other low income programs and non-profits with experience in delivering energy efficiency programs (e.g. Green Communities Association).

11. Page 25, first para after second bullet - "as not being unaware" should read "as not being aware" Done

12. Page 26 first para - cost effectively reference - some low income programs may be market transformation based and may not be cost effective from the typical TRC test perspective - you may want to remove this and terminate the sentence at :.....aggressively." We have continued to include cost-effective as it is meant to be the plain English meaning of the term, rather than a reference to the TRC. At the program design stage for these programs, the cost-effectiveness tests for low income programs, which should be different than those for other DSM programs, will need to be worked out. Too great a level of detail to sort out the issue in this report.

Hope this helps.

Norm Ryckman
Group Manager Business Intelligence & Support
500 Consumers Road
P.O. Box 650
Scarborough, Ontario
M1K 5E3

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Fax (416) 753-6292
email norm.ryckman@enbridge.com

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Judy Simon <JSimon@indeco.com>

04/06/2004 01:00 PM

To: "Norm Ryckman" <Norm.Ryckman@enbridge.com>
cc: "Cathy Hanlon" <Cathy.Hanlon@enbridge.com>, "Susan Clinesmith" <Susan.Clinesmith@enbridge.com>, rbunker@indeco.com, Theresa McClenaghan [CELA] <mcclenat@lao.on.ca>
Subject: Re:Draft report on low income opportunities - comments due 11:00 am Apr 7th

Norm,

Below is the draft of the low income opportunities report being prepared for TEA and CELA. Based on some preliminary feedback we have received, we expect that the draft below will be revised to contain the following:

- add a principle that universal, heat and electricity are basic human necessities
- a recommendation that there be no cut-offs of heat and electricity during the heating season for low-income households
- a recommendation that the requirement for security deposits for low-income electricity customers be eliminated
- the rebate for low income customers to pay their electricity bills will be annual, and automatic, based on the previous year's income tax filing, and the magnitude of the rebate will be linked to household size and of a significant enough amount to reduce the energy burden of households below LICO
- electric and gas utilities be encouraged to cooperate in determining the design of DSM programs for low income households and the delivery channels for these programs. The delivery channels for these programs should include local community groups that supply services to low income households.

Because of the tight timetable for this report, I am requesting that you

kindly provide any comments that you have by 11:00 am tomorrow morning,

Many thanks.

Judy

Judy Simon
Vice-President
IndEco Strategic Consulting Inc.
2 Pardee Avenue #302
Toronto, ON M6K 3H5 Canada

Tel: 416 532-4333 x 207
Fax: 416 532-5485

<< Attachment Removed : Low income energy conservation and
assistance2.pdf >>

To: "Norm Ryckman" <Norm.Ryckman@enbridge.com>
Cc: "Cathy Hanlon" <Cathy.Hanlon@enbridge.com>
Subject: Re: IndEco Report comments from Cathy
Sensitivity:
From: Judy Simon <JSimon@indeco.com>
Date: Thu, 8 Apr 2004 10:06:40 -0400
Bcc: Theresa McClenaghan [CELA] <mcclenat@lao.on.ca>

Norm,

See comments below. Many thanks for the input.

The report will be finalized later today and is expected to be sent to the Ministers of Energy and Community and Social Services later today. We will send you a copy of the final report. Thanks for all your support and patience on this project.

Judy

"Norm Ryckman" <Norm.Ryckman@enbridge.com>

04/07/2004 11:19 AM

To
JSimon@indeco.com

cc
"Cathy Hanlon" <Cathy.Hanlon@enbridge.com>

Subject
IndEco Report

Judy, Cathy's comments are shown below. On the last point that Cathy has raised I felt this was covered under the comments regarding future stakeholder input but I will leave that to your discretion. Tks.

Norm Ryckman
Group Manager Business Intelligence & Support
500 Consumers Road
P.O. Box 650
Scarborough, Ontario
M1K 5E3

Office (416) 753-6280

Fax (416) 753-6292

email norm.ryckman@enbridge.com

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----- Forwarded by Norm Ryckman/GAS/Enbridge on 04/07/2004 11:14 AM

Cathy Hanlon

04/07/2004 07:49 AM

To: Norm Ryckman/GAS/Enbridge@Enbridge

cc: Susan Clinesmith

Subject: IndEco Report

Norm: Several things stuck out for me.

1. Waive security deposits for electric. We also ask for security deposits for gas if the customer has been redlocked, broken payment arrangements, or has a bad history with a former account? The report recommends waiving the security deposits required by the electric LDCs.
2. I disagree with the principle of rebates. This money could be better put to use with EE initiatives to reduce their bills over the longer term. Sending these customers a cheque for \$200 is not a good idea in my opinion. The Minister of Energy had asked CELA to recommend a program to provide assistance to low income customers that would have a more immediate impact than DSM programs, recognizing that DSM programs would also be important. We were obliged to recommend some type of program that fits between the emergency assistance and DSM. The report recommends a comprehensive approach, requiring all 3 types of assistance. While there are problems with the rebate as it is a blunt instrument, it is easy to set up and administer and can be better targeted and controlled in the second generation of its implementation. Input was sought from a number of stakeholders including TEA, CELA, ACTO, VECC, ISAC, Green Communities Association and the members of LIEN. The reference to the \$200 is dropped.
3. Love the sections on fuel switching, in particular space heating and water heating. We could definitely partner with others on this.
4. As far as cutoffs go, we CAN turn off gas in the winter, however, only do it under extreme circumstances. Thanks.
5. I'm not sure how this can work into the report but I would have like a mention that with the short timelines in some of the report, i.e. fall of 2004, I would have liked to see a mention of working with Enbridge and Union where appropriate to develop the perspective programs, similar to the Massachusetts /KeySpan has (page 13) We have made the report more explicit by indicating that consultation should include both the natural gas utilities and the electric LDCs.

Cathy Hanlon

Manager, New Construction and Mass Markets Development

e-mail address: cathy.hanlon@enbridge.com

Website: www.enbridge.com

416-495-5673

Subject: Final report attached

To: keith@torontoenvironment.org,

'Theresa McClenaghan' <mcclenaghan@execulink.com>,

mcclenat@lao.on.ca

Cc: JSimon@indecocanada.com

From: rbunker@indecocanada.com

Date: Thu, 8 Apr 2004 13:14:25 -0400

Hi Keith and Theresa,

Please find attached the final report Low income energy conservation and assistance, in Adobe Acrobat pdf format. Please let me know if you have any problems with the attached file.

I think the report has turned out wonderfully and I look forward to hearing the outcomes of the upcoming meetings with the two ministries. Thank you both for the opportunity to work on this project. We very much enjoyed it!

Cheers,
Raegan

(See attached file: Low income energy conservation & assistance.pdf)

From: "Theresa McClenaghan" <mcclenaghan@execulink.com>
To: "Mary Todorow \ (ACTO\)" <todorom@lao.on.ca>, <rbunker@indeco.com>
Cc: "Sarah Blackstock \ (ISAC\)" <blackstocks@lao.on.ca>, <jsimon@indeco.com>, <keith@torontoenvironment.org>,
"Theresa McClenaghan \ (CELA\)" <mcclenat@lao.on.ca>
References: <OF859A9F78.B6550F97-ON85256E6F.006F9828-85256E6F.00706BDF@indeco.c
Subject: Re: Recommendation re: mandatory exemption for consumer security deposits
Date: Wed, 7 Apr 2004 21:45:38 -0400

Hello everyone. Thanks to all of you for all of your excellent work. I've reviewed all of the comments and all of the changes and CELA is ready to sign off on the report based on all of the items that Reagan has indicated will be changed. I'm in my office in Toronto tomorrow; will follow up with Marion re a meeting with the Ministers and let you know what I find out; maybe Sarah can do the same. Theresa.

Theresa McClenaghan, Counsel,
Canadian Environmental Law Association
New Street Address as of October 1, 2002
301-130 Spadina Ave., Toronto, ON M5V 2L4
No changes to phone and fax:
T:416-960-2284 ext.218 F:416-960-9392
mcclenat@lao.on.ca

Home office email mcclenaghan@execulink.com
Home office telephone 519-442-1589

CELA's Library website: www.ecolawinfo.org

Confidentiality Note: This message may be subject to solicitor - client privilege. If you have received this message in error, please let me know by reply email, and delete your copy. Thank you.

----- Original Message -----

From: <rbunker@indeco.com>
To: "Mary Todorow (ACTO)" <todorom@lao.on.ca>
Cc: "Sarah Blackstock (ISAC)" <blackstocks@lao.on.ca>; <jsimon@indeco.com>; <keith@torontoenvironment.org>; <mcclenaghan@execulink.com>; "Theresa McClenaghan (CELA)" <mcclenat@lao.on.ca>
Sent: Wednesday, April 07, 2004 4:20 PM
Subject: Re: Recommendation re: mandatory exemption for consumer security deposits

>
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>
>
>
>

> Hi Mary,

>

> Thanks for this additional information. We will change the wording of the
> recommendation to be that of your first sentence. The rest of it (from
> "currently " onwards) we will put as a footnote.

> distributors to refund all or part of security deposits charged after
> November 25, 2002).

> If you need more explanation/background to the recommendation -

> Excerpt from November 21, 2002 letter to then-Energy Minister Baird and
OEB

> Chair Laughren:

> Numerous jurisdictions in the United States prohibit utilities from
> requiring security deposits from all or certain classes of residential
> utility consumers. In Massachusetts, gas or electric utility companies
> subject to the jurisdiction of the Department of Public Utilities are not
> permitted to require a security deposit from residential customers in
> advance of, or as a condition to, new or continued service.

> Other states have limited the ability of utilities companies to require a
> security deposit. In Connecticut, gas and electric companies may not
> require a security deposit if a customer is unable to pay, e.g. on public
> assistance, only receives income from social security, veteran's
> administration or unemployment compensation benefits, under 125% of the
> poverty level, or at risk of lack of necessities for self or dependent
> children in household. Utilities in Michigan do not require deposits of
> new, old or current customers if the department of social services is
> responsible for payments.

> In the state of New York, the Fair Home Energy Practices Act prohibits
> utilities from imposing security deposit requirements on recipients of
> public assistance, supplemental security income or additional State
> payments. In addition, utilities cannot demand or hold a security deposit
> from persons 62 years of age or older unless the customer has had service
> terminated by the utility for nonpayment of bills within the preceding six
> months.

> Excerpt from July 10, 2003 VECC submission to OEB's written hearing on
> consumer security deposit policies:

> Residential customers do not present the greatest non-payment risk to LDCs

> The Board has recognised that the residential customer rate class does not
> post the greatest degree of non-payment risk, as acknowledged in its June
> 10, 2003 Notice of Proceeding: "...large customers (> 50 kW),
representing

> the greatest degree of non-payment risk, would have their deposit refunded
> after 7 years of GPH".

> We also note that research on payment patterns of utility customers
> indicates that residential consumers tend to pay their utility bills
before

> paying nearly any other obligation, other than rent or mortgage. This
> supports the argument that distributors may exempt a certain portion of
> residential customers, without undue financial risk or risk of being held
> imprudent by the Board. The Board, in its August 14, 2002 letter

> reiterated
> that LDCs "are not intended to be held generally accountable or at risk for
> uncollected commodity costs from consumers."
>
>
>
> The overall impact of paying higher utility costs is much greater upon
> lower
> income residential consumers than any other class of consumers. The
demand
> for utilities by residential consumers is virtually inelastic. A
consumer's
> dependence upon these utilities is such that the consumer will continue to
> demand almost the same amount of service even if the price increases.
> Residential consumers who are also poor have an even more inelastic
demand,
> being less able to choose between alternate suppliers of electricity than
> any other class of consumers.
>
> Statistics confirm this assertion. A recent Statistics Canada analysis of
> the widening gap between rich and poor Canadians strongly suggests the
> difficulties low-income families, who would not qualify for social
> assistance utility supports would face in having to pay a security
deposit.
> The typical low-income family in 1999 had only \$300 in savings to protect
> it
> against unexpected financial hardships.
>
> In 1999, the lowest household income quintile (those earning less than
> \$20,520 per year) in Canada, spent, on average, more than twice the amount
> of their income on utilities (water, fuel and electricity) than the
highest
> income quintile (those earning \$79,964 and over).
>
>
>
> Conclusion
>
> VECC recognizes that the rationale for applying a security deposit by a
> utility is to protect a utility from those customers who fail to pay their
> bills and protect other ratepayers who would be required to make up the
> loss
> of revenue from non-paying customers. This argument, however, must be
> weighed against other, equally compelling arguments. These include the
> actual financial capability of low and fixed income residential consumers
> to
> meet the obligation represented by a security deposit, the relatively low
> level of financial risk that would be posed by exempting consumers who met
> the required definition of low-income, and the ultimate impact of the
> inability to access electrical service by residential consumers.
>
>
> Mary Todorow
> Policy Analyst
> Advocacy Centre for Tenants Ontario (ACTO)

> 425 Adelaide St. West, 5th floor
> Toronto, Ont M5V 3C1
> (Tel) 416-597-5855, ext 5173
> (Toll free) 1-866-245-4182, ext 5173
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