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Présidente et Directrice Générale



January 31, 2017

Serge Imbrogno
Deputy Minister
Ministry of Energy
4th Floor, Hearst Block
900 Bay Street
Toronto, ON M7A 2E1

Dear Deputy Imbrogno:

Re: OEB Response to EDA Letter to Secretary of Cabinet

I wanted to take this opportunity to provide a response from the Ontario Energy Board (OEB) to the comments related to the Ontario Electricity Support Program (OESP) noted in Appendix 2 of the January 25, 2017 letter to the Secretary of Cabinet from the Electricity Distributors Association (EDA).

In its letter, the EDA provided recommendations on how to increase uptake on the OESP. I am pleased to note that most of the actions referred to in the letter have already been undertaken by the OEB or are currently underway. The following provides comments on the specific points noted in the EDA's letter. Further details have also been provided in an appendix to this letter.

As you know, during both the development of the Report to the Minister (the Report) and the implementation of the OESP, one of the key priorities for the OEB was ensuring the program was as accessible as possible. In implementing the program the OEB worked closely with all stakeholders and, in particular agencies and distributors, with specific working groups, to make sure the program was accessible for consumers.

With respect to availability of information in languages other than English or French, the OEB understood from the onset that this would be an important aspect of our communications to increase awareness amongst communities where English or French may not be a first language. In fact, the OEB has for many years produced materials in a variety of languages on important issues. During OESP implementation we were informed by the practices of Ontario ministries and agencies as well as advice from agencies working with low-income communities to identify the

appropriate languages. Details of how we implemented a multi-language approach are provided in the Appendix.

The EDA comments included a comment on potential for social stigma/self-identification to affect consumer interest. As part of our Report to the Minister consideration was given to how to ensure all eligible low-income consumers could access the program without the need for a visit to a social agency which we understood could be uncomfortable for some consumers. It was for this reason, amongst others, that the OEB developed an on-line application system with income verification. Through this vehicle the need to provide personal information to a third-party is minimized. It is important to note that personal income information from Canada Revenue is shared only with the Ministry of Finance. The credit amounts and system have been designed in a way that it is not possible to determine a consumer or household's income range from the amount of the credit itself (more detail is provided in the Appendix).

In regards to the EDA's suggestions on the application process and questions being difficult to understand, wording for the OESP website, forms and communications material were developed using plain language to the extent possible. The material was reviewed with both our Financial Assistance Working Group and (utility-based) Implementation Working Group to get advice on making the application as simple as possible. We review the information on a regular basis and have made changes as needed to make the form more consumer friendly.

The letter also raises the subject of technical "glitches" which the EDA characterizes as technical issues with the OESP portal. I, respectfully, disagree. The interface between the OESP system and utilities was developed in consultation with utilities with the objective of finding the simplest mechanism for confirming that the applicant was an account holder with the utility.

Some utility systems were flexible enough to accommodate small variations in how the information (name, account number and service address) was entered by the consumer versus what appeared in the utility's Customer information System. Other utility systems, however, were quite inflexible and required an "exact match" (i.e. street had to be entered as ``St``) of what appeared in their system. This led to what we believed was an unreasonable number of rejections by those utilities. We immediately took steps to contact the affected utilities and ensure they undertook modifications to their matching algorithms to reduce errors while still ensuring sufficient confirmation of the applicant's account.

In recognition of this customer service issue, the OESP online application system was quickly modified so that as soon as an applicant chooses their utility, they are shown a sample bill for that utility with the required information highlighted and direction on where to include this information. We continue to work with utilities where additional issues are identified with utility processing of applications; however we have seen the instance of such errors diminish greatly with utility system changes.

The EDA has suggested that we look at use of provincial data systems to enrol consumers. As you are aware, through your Ministry, the OEB has collaborated with many provincial and federal government departments to increase awareness of the program and identify opportunities for further program enhancement and outreach. Most recently the OEB met with Energy and the Ministry of Community and Social Services to discuss reaching potential OW and ODSP clients. We are also working with Energy, the Ministry of Finance and Canada Revenue Agency on possible changes to the written consent form to help reduce barriers to access. Collaboration with Ministries and other government offices or agencies is an important objective for the OEB in reaching the intended beneficiaries and work in this area will continue.

With respect to distribution of OESP materials, as you know the OEB has undertaken an extensive communications plan to ensure wide dissemination of information about the availability of the OESP. I have provided the details about our awareness campaign and approach to disseminating materials through multiple channels in the community in the Appendix.

Regarding the suggestion to include an option to add the OESP to the provincial portion of the income tax form, this possibility was discussed during the development of the OEB's Report to the Minister. At that time we were advised by Ministry of Finance that it was not possible. However, should the opportunity arise to add this as an option we would, of course, be happy to work with the Ministry of Finance. Based on the advice we received from low income agencies, we understand that not all low-income households file taxes and often circumstances change mid-way through a tax year. As such, it would be important to ensure we maintain the existing application process in addition to other forms of intake.

Finally, I would like to note that OEB has worked closely with utilities as important partners in the delivery of the OESP. In addition to utility bill inserts, the OEB has also provided utilities with copies of digital materials for use on their websites, newsletters, envelopes and social media platforms. We have heard that many utilities have undertaken efforts on their own initiative to proactively reach out to their customers about the OESP, provide online access in their offices on which consumers can apply and have partnered with local intake agencies to promote the program at events. The OEB is supportive of any effort by local distribution companies to promote the program.

During report development and implementation, utilities very clearly advised the OEB that they did not believe they were the appropriate entity to assist with application intake. Rationale included lack of experience (particularly with manual income verification), concerns about customer privacy and utility staff handling sensitive personal information of their customers. As such, we've partnered with social agencies with this experience to assist with application intake. It is our understanding that many agencies would welcome participation from the utilities at events to help promote the OESP and we would encourage any utility with an interest to contact the local agency.

Stakeholder input is a key cornerstone of the OEB and we appreciate any feedback received, particularly opportunities to help broaden awareness of the OESP and increase the number of eligible participants.

We would be pleased to provide any additional information or context and look forward to continue working with you, and with partners in the sector, in the delivery of the OESP to assist low-income consumers with their electricity bills.

Sincerely,

A handwritten signature in black ink, appearing to read "Rosemarie T. Leclair". The signature is fluid and cursive, with the first name being the most prominent.

Rosemarie T. Leclair
Chair & CEO

Appendix

Multi-language communications efforts:

- Brochures for the OESP are available in the following languages: English, French, Arabic, Farsi, Hindi, Italian, Portuguese, Punjabi, Simplified Chinese, Somali, Spanish, Tamil and Urdu. Brochures are also available in four First Nations languages – Ojibway, Cree (Mushkegowuk), Cree (Plains) and Ojicree.
- Further, in addition to English and French, radio ads have been translated and run on multi-cultural stations in the above languages as well as Cantonese and Mandarin.
- Copies of these materials have also been distributed to agencies and other organizations as requested to help support spreading the message of the OESP within those communities.
- All of these materials are available on our website

Confidentiality and sensitivity to personal information:

- The online application process does not require any documentation to be submitted by the applicant.
- The applicant needs to refer to copies of the utility bill and tax documents to fill out the application correctly.
- Documentation only needs to be shared with an intake agency where an applicant's household income cannot be verified through CRA (i.e. a household member over 18 has not filed taxes) and must be done manually by the agency.
- It is important to note that none of these documents are shared with the OEB, the OESP central service provider, or the utility.

Our program communications and awareness building campaign involved

- Material (posters, brochures, application forms, digital material) distributed broadly on several occasions to stakeholders, including:
 - MPP offices, MP offices and local councillor offices
 - All Service Ontario locations
 - Food banks and libraries
 - Both OESP intake agencies and non-OESP community / social agencies
 - OW and ODSP cheque inserts
 - Utility bill inserts

- Several advertising campaigns over the past 18 months to increase awareness of, and participation in, the OESP. In addition to the posters and brochures noted above, aspects of the campaigns included:
 - Province-wide radio ads, including targeted First Nations and multi-ethnic radio stations
 - Tim's TV
 - Transit advertising
 - Doctors' offices
 - Daily print publications
 - Weekly community papers
 - Web search optimization
 - Social media ads
 - Web targeted display
 - Ads on cell phone game apps
- A pilot direct mail campaign was undertaken in July and August 2016 to 275,000 households in neighbourhoods with high population of low-income households. 2/3 of the packages included a copy of the paper application form while the remaining 1/3 contained an OESP brochure. These materials were included in the weekly newspapers for those communities.