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Household Energy Affordability in BC

Submission to the Energy Affordability Working Group

May 13, 2022

In April 2022, the Energy Affordability Working Group, comprised of representatives from the BC Ministries of Energy, Mines and Low Carbon Innovation (EMLI), Social Development and Poverty Reduction (SDPR), Indigenous Relations and Reconciliation (IRR) and BC Hydro, convened a stakeholder discussion on household energy affordability in BC.

The following five questions were posed by the Working Group to stakeholders:

- 1. Are you aware of household energy affordability issues among your customers, members or the individuals or groups that you work with and/or represent? What are the issues and what have been their impacts?*
- 2. What additional information would you like the working group to consider as it develops options and recommendations for Government?*
- 3. The working group has been specifically tasked with providing recommendations to Government regarding BC Hydro's CCF. Do you support the continuation of a program that provides temporary, emergency assistance to households faced with disconnection? Why or why not? Do you have any suggestions for how the current CCF program could be improved or enhanced?*
- 4. Do you have any suggestions for how other current energy affordability programs in B.C. could be enhanced or improved? For example, how could programs be made more accessible? What could be done to enable participation?*
- 5. Do you have any suggestions for new energy affordability programs that could be implemented in B.C.?*

In response, our organizations are pleased to provide the following written recommendations for this Working Group, in addition to our participation in the online stakeholder engagement workshops.

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1. Are you aware of household energy affordability issues among your customers, members or the individuals or groups that you work with and/or represent? What are the issues and what have been their impacts?

Our experience with home energy insecurity

Ecotrust Canada

Ecotrust Canada's Community Energy team works exclusively with rural, remote and Indigenous communities that are experiencing energy affordability issues. Our community partners include the Hupacasath, Haítzaqv (Heiltsuk), Quatsino and 'N̓amgis First Nations, as well as settler communities and regions including Prince Rupert, qathet Regional District (Powell River) and the Regional District of Mount Waddington.

We are working with each of these communities to advance deep retrofit projects that can effectively address the root causes of energy insecurity. These projects are collectively realizing millions of dollars in energy cost savings for community members, and are contributing to community health and resilience.

We believe that no one should have to choose between heating their home and feeding their family. Over the last five years, our Community Energy team has been hard at work with community partners, proving home energy retrofit projects on the ground, and researching policies that can help make energy cleaner and more affordable for rural, remote, and Indigenous communities.

Kambo Energy Group

Kambo Energy Group is a BC-based social enterprise that designs and delivers turnkey energy efficiency, conservation, and education programs on behalf of utilities and others with a specific focus on groups that are hardest to reach. The only organization of its kind in Canada, Kambo is a leader in creating impactful solutions that reach target markets requiring a unique, trusted, and proven approach.

Launched in 2009, Kambo was developed to address equity gaps in the energy efficiency market. Historically, traditional Demand Side Management (DSM) programming has seen little participation from people with low-to-moderate incomes, diverse multicultural communities and Indigenous peoples. Kambo's programs work to address these gaps.

Kambo's philosophy and approach is to design programming that overcomes the unique systemic barriers faced by diverse populations – this has led to programs that outperform traditional mainstream programs that typically have a one-size-fits-all approach.

BC Poverty Reduction Coalition

The BC Poverty Reduction Coalition is composed of over 100 organizations and community mobilizations that come together to advocate for public policy solutions to end poverty, homelessness and inequality

in BC. We aim to improve the health and well-being of all living in British Columbia. The Coalition advocates for a targeted and comprehensive poverty reduction strategy that prioritizes equity-seeking groups, and a whole government, cross-ministry approach to ending poverty. Our work is grounded in the foundation of universal human rights.

Part of our work is prioritizing low income people across BC affected by energy insecurity issues, as well as supporting unique needs of systematically disadvantaged groups to access all services, including targeted measures to remove barriers to access and tailored supports. This includes access to energy that is affordable and accessible for all who call BC home.

Create Climate Equity

Create Climate Equity is a not-for-profit that advocates for energy and climate policies and programs that are equitable, just, and effective for all. It achieves this through the delivery of energy efficiency programs and the incubation of innovative energy research and projects.

Create Climate Equity is rooted in three pillars: advocacy, research and project Innovation. It was founded by Areef Abraham, founder of Kambo Energy Group. Areef retired as President of Kambo Energy Group in 2018, and in 2020 Areef launched Create Climate Equity to give back to communities across Canada, leveraging his experience in the private sector and noting a gap in research and incubation for equitable and just energy efficiency programming that neither the public nor private sector are meeting.

Allison Ashcroft (CUSP)

Allison Ashcroft is the outgoing director of the Canadian Urban Sustainability Practitioners Network (CUSP), and opinions expressed in this submission are her own. CUSP connects member municipalities, affiliate networks, and key partners to overcome shared challenges and advance individual, yet common goals. CUSP's member cities represent a population of 18 million, or one half of the country's population and generate \$1 trillion, or 55% of the country's GDP.

Since its inception, centring equity in the work of climate practitioners and municipal plans, policies, and programs has been CUSP's priority, and energy insecurity has emerged as the nexus of climate and equity for CUSP and its members. Under Allison's leadership, CUSP developed the [Energy Poverty and Equity Explorer](#) tool, which enables users to visualize different levels of home-energy cost burdens, along with other variables such as housing quality and affordability indicators, income and poverty status indicators, and racialization indicators at various geographical scales. The Tool received honourable mention as a World Changing Idea by Fast Company in May 2020.

Health impacts of energy insecurity

A lack of access to basic energy services can have profound impacts on human health and well-being. High energy costs exacerbate the social distress and impact of poverty in low-income communities, while inadequate heating and/or cooling systems lead to negative health and social impacts from lower air quality, overheating, underheating and mould.ⁱ Indeed, in our experience some residents do not heat their homes at all because they cannot afford heating fuel, and many families experience higher

instances of asthma, cardiovascular, and mould-related illnesses as a result of vastly inadequate heating and ventilation systems.ⁱⁱ Overheating in homes can also pose a significant health risk, particularly for seniors and persons with reduced mobility that are not always able to access cooling centres. Households that experience energy insecurity consistently report poorer overall health, both physical and mental.ⁱⁱⁱ

Households adapt to the high cost of energy through a range of compromises and inconveniences, including the collection of wood for heat, going without adequate heating, and seeking alternative shelter during extreme weather events. In some cases, adaptation is not possible – as demonstrated tragically during BC’s 2021 heat dome event. Meanwhile, some families in communities we have worked with have reported being cut off from their energy services or forced to choose between paying their utility bills and feeding their families, which can be a source of anxiety and shame.^{iv}

Energy Affordability in Rural and Remote Communities

Energy insecurity affects all regions of British Columbia, but rural and remote communities are at greater risk of experiencing energy insecurity than urban communities.^v For example, rural areas tend to have a higher proportion of detached, single-family dwellings and larger homes overall, leading to higher energy demands.

There are two broad categories of non-urban communities, each with a unique context:

- *Rural* communities are defined here as those without access to the natural gas distribution network. This category of communities tends to experience higher energy costs overall due to lack of access to this affordable (but polluting) fuel source.
- *Remote* communities are those without access to natural gas *or* the North American electricity grid. These communities rely instead on local electricity micro-grids, typically powered by expensive and polluting diesel fuel.^{vi}

In many non-urban communities, poor quality housing, lower incomes, limited access to energy sources, high electricity costs, and in some cases no access to grid electricity all contribute to a higher incidence of energy insecurity. Furthermore, these households face geographic, financial and awareness barriers that make it difficult to invest in home efficiency upgrades^{vii}.

- *Geographic barriers* include isolation, distance from human and financial resources, lack of economies of scale, lack of qualified contractors willing to serve rural and remote areas.
- *Financial barriers* include the high upfront cost of home energy retrofits (exacerbated by travel cost to remote areas), lower median income, and low willingness to take on debt for energy efficiency loans.
- *Awareness and access barriers* include a lack of traditional marketing channels, lack of awareness of energy efficient technologies, and skepticism of existing resources.

Energy Affordability in Indigenous Communities

Energy insecurity is experienced across Indigenous communities of all types in Canada, driven in large part by a colonial legacy of low-quality housing. *On-reserve* Indigenous communities can be rural, remote, or neither. These communities experience significant issues related to inadequate housing supply and associated overcrowding, compounded by a history of government agencies failing to deliver quality building materials and adequate funds for building maintenance.^{viii} The result is that on-reserve homes can experience inadequate ventilation, leading to poor air quality, mould and moisture issues, and leaky building envelopes that result in significantly higher energy use.^{ix} As an example, 7.8% of income is spent on energy in an average Musqueam household versus 2.4% across British Columbia, despite Musqueam’s urban location and access to both natural gas and grid electricity.^x

Virtually all on-reserve Indigenous communities are challenged by this issue, resulting in higher rates of energy insecurity regardless of what fuel is used or whether the community is on or off-grid. Since poor quality housing and lack of access to affordable home energy are the primary factors contributing to energy insecurity, solutions must be developed to address this challenge across all Indigenous communities, regardless of their location or primary heating energy source.

Any discussion of policy pertaining to Indigenous communities must also be based in an understanding of colonialism and contextualized with the *Indian Act* of 1876. For example, Section 18 of the *Indian Act* dictates that reserve lands are “held by Her Majesty for the use and benefit of the respective bands for which they were set apart”, setting out the reality that legal models of homeownership are dramatically different on-reserve than in other places where fee simple title is the norm.

While it is sometimes possible for a band member to obtain a “Certificate of Possession” for their home on-reserve, Section 89 of the *Act* restricts the seizure of property on-reserve. This means that band members cannot use their homes as collateral to securitize a loan, thereby limiting the potential for private lending for housing upgrades and retrofits. While banks may lend to a band that can in turn administer funds on behalf of band members, the implication overall is that the main source of funding for efficiency projects on-reserve is government-administered grants.

As a result of the above and other factors, we estimate that energy insecurity rates can be up to three times higher on Indigenous reserves than the provincial average.^{xi}

Issues with the Customer Crisis Fund Pilot

British Columbia currently has no ongoing bill support program, and the high rejection rate of BC Hydro’s Customer Crisis Fund — when viewed alongside the prevalence of energy insecurity in the province — suggests that this program is suffering from an insufficiently comprehensive eligibility mechanism.

Province-wide, BC Hydro rejected between 60 and 65% of applications made to the *Customer Crisis Fund* over the three-year pilot. These rejections were due largely to customers not yet facing an imminent

disconnection, or as a result of the utility determining that their financial circumstances did not warrant a grant.^{xii}

During a meeting in late 2019, residents from the 'Namgis First Nation in Alert Bay, B.C. told Ecotrust Canada that approximately 90% of applications that community members made to the BC Hydro Customer Crisis Fund were rejected. This rate of rejection deterred applications from being submitted at all, even in circumstances where they believed they were eligible for the program, further diluting the true rate of access.

Consistent with this high rejection rate, in the first year of the program, BC Hydro only spent \$1.7 million of the \$4.5 million that it collected through a \$0.25/month rate rider on all residential customers' bills — this amounts to less than 40% of the program's planned budget. As a result of this disconnect between restrictive eligibility criteria and actual need, many households that might otherwise have benefitted from available funding, as intended by the program, were left — quite literally — out in the cold.^{xiii}

After receiving complaints from customers about the additional charge, the utility opted to cut the rate rider that funds the program to \$0.13/month rather than change the eligibility criteria for the program to be more accessible.^{xiv} This unfortunate decision left even fewer resources available to households that were unable to pay their electricity bills, and highlights the need for a sustainable and socially acceptable funding model for these types of programs.

2. What additional information would you like the working group to consider as it develops options and recommendations for Government?

A credible long-term strategy for addressing energy affordability in BC would include two major components:

1. a plan to improve energy efficiency and reduce consumption across households facing energy insecurity and,
2. direct financial support for households facing excessive energy cost burdens.

We consider these issues in the following background information.

Lifeline Rates and the BCUC's Role

Over the years, there has been considerable discussion in British Columbia around the creation of rate protections, or a separate rate class, for low-income or energy-insecure households. To date, the BC Government has not considered introducing a provincially administered energy subsidy, but has instead focused on energy rates, and electricity rates in particular.

The current BC Government committed to work with BC Hydro to develop a "lifeline rate," which would have offered a lower electricity rate to low-income households.^{xv} However, this program was never implemented, and the provincial government instead focused on keeping overall electricity rates stable pending the comprehensive review of BC Hydro.

Many of the barriers facing the development of a low-income rate class in BC revolve around the jurisdiction of the provincial energy regulator, the BC Utilities Commission (BCUC). The BCUC's mandate, as set out in the *Utilities Commission Act*, requires that rates be fair and non-discriminatory. Unfortunately, this determination is made almost entirely on an economic cost-of-service basis, and does not consider a multitude of other socioeconomic and environmental factors that would be more in line with a modern and equity-centered approach to energy regulation.

The BCUC is currently very constrained in the scope of its approvals process, and has no explicit jurisdiction to approve changes that would improve social outcomes related to energy use. In fact, the BCUC specifically determined in 2017 that they did not have the authority to approve a low-income rate class.^{xvi} To date, neither the BCUC nor the BC Government have been willing to press for changes to the *Utilities Commission Act*, resulting in a regulatory deadlock that hampers the development of innovative utility policies and business models in general.

British Columbia, therefore, has no active program that discounts electricity bills on an ongoing basis, whether through an on-bill credit, rate subsidy, or separate rate structure. Thus, the needs of thousands of households experiencing energy insecurity are currently going unaddressed.

One-time protection programs

One-time, or emergency programs provide singular credits to help households facing short-term, extenuating circumstances affecting their ability to pay their bills, and are not meant to provide ongoing support. Circumstances commonly considered eligible include exceptionally high bills due to winter heating or summer cooling, loss of income, disconnection or disconnection notice, and needing arrears assistance. Ecotrust Canada's 2020 [jurisdictional scan](#) concluded that the primary indicator of success for emergency bill assistance programs is appropriate eligibility criteria.

Certain programs, as is the case with BC Hydro's *Customer Crisis Fund*, receive adequate funding and have a demonstrated demand, but may struggle to effectively meet customer's needs, due to unclear or restrictive eligibility criteria. The *Customer Crisis Fund* initially required that households receive a disconnection notice before applying for such assistance,^{xvii xviii} while other programs have household income requirements, such as Ontario's *Low-Income Energy Assistance Program* (LEAP).^{xix}

In our view, programs such as New Brunswick's *Emergency Fuel Benefit* (EFB), which are far less rigid in the determination of eligibility criteria, take a more equitable and accessible approach to program design. New Brunswick's EFB lists "having to choose between paying heating bills or feeding one's family," and other similar circumstances, as eligible emergency situations for receiving the benefit. Indeed, for the purpose of determining household need, EFB removed the requirement that household financial assets be depleted in order to qualify, so that present-day emergencies do not require one to sacrifice savings for the future.^{xx} If customers are able to access assistance before the complete depletion of their assets, future financial hardship — and thus future dependence on assistance programs — may be avoided.

Of all the one-time protection programs we have examined, the maximum benefit has been no less than \$400.^{xxi} Both Ontario’s LEAP and New Brunswick’s EFB have maximum support levels similar to BC Hydro’s *Customer Crisis Fund*. LEAP offers a maximum of \$500 to qualifying households or \$600 to those who heat electrically,^{xxii} while EFB, which does not differentiate between heating methods, offers a maximum of \$550.^{xxiii} Thus, it appears that the current support levels of BC Hydro’s *Customer Crisis Fund* are consistent with other successful programs.

Seasonal programs

In some jurisdictions, where winter heating costs may consistently present as a barrier, there may be a program in place specifically for the winter months. New Brunswick and Nova Scotia both have programs designed to assist with winter heating: the *Electric Fuel Supplement (EFS)* and *Heating Assistance Rebate Program (HARP)* respectively. The *Electric Fuel Supplement* is a provincially funded program, which offers a monthly credit of \$150 to recipients of social assistance from November to April, while HARP is distributed annually based on a sliding scale of eligible incomes and is available for the months of October to March.

These programs are distinct from one-time programs, such as the *Emergency Fuel Benefit*, as they offer support for recurring barriers, rather than for urgent and exceptional circumstances. The applicability of a seasonal assistance program, or adjustment, for BC would be highly regionally dependent. Northern and Interior regions of the province experience very cold winters, but coastal regions generally do not.

On-bill credits – sliding scale

Other jurisdictions, such as Ontario, have programs in place for customers who face ongoing difficulty paying their energy bills. As such, regardless of outside factors — such as higher winter heating costs — if a customer fits the income criteria, they may access the benefit. Ontario’s *Electricity Support Program (OESP)*, is a provincially funded program that offers a fixed monthly credit on a sliding scale based on income, with a more generous scale for those who heat with electricity or use a pre-approved medical device that requires electricity, such as a respirator or dialysis machine.

Sliding-scale credits are generally preferred over *invariant credits* as the assistance levels are tailored toward estimated need based on income. As such, funding is being distributed more equitably between participating customers. However, most programs with *sliding-scale credits* based on income do not account for discrepancies in energy needs. For example, housing in rural and Indigenous communities may require more electricity to heat for reasons such as larger, older, or otherwise less energy-efficient homes. Thus, a household in a rural community with the same income as one in an urban community may have a higher energy burden, and require a different level of assistance.^{xxiv} For that reason, programs based solely on income may not accurately allocate funding toward those most in need.

As a way to mitigate the limitations of the sliding-scale approach, the Ontario Electricity Support Program created two separate sliding scales, with a more generous one being available to households facing a higher energy burden due to factors other than income. The “energy intensive” sliding scale is available to Indigenous households, those who heat electrically, and those who make use of certain pre-

approved medical devices.^{xxv} However, while this approach accounts for more discrepancies in energy burdens than a simple sliding-scale approach, fixed credits inherently ignore the nuances of energy needs — especially as it relates to the urban-rural divide. Accordingly, a program with assistance levels based dually on energy demand and income would likely prove more equitable.

On-bill credits – percentage rebate

A more favourable alternative to sliding-scale based credits are programs that offer percentage rebates on household energy bills. California's *CARE (California Alternative Rates for Energy) Program* is an example of such a program. CARE is a state-wide program, funded through a rate rider charge, which offers 30-35% discounts (depending on the utility) on electricity bills to low-income customers if the utility serves over 100,000 customers, or a 20% discount if the utility serves fewer than 100,000 customers.

Certain larger utilities, namely Southern California Edison, San Diego Gas and Electric Company, and Pacific Gas and Electric Company offer a sister program: the *Family Electric Rate Assistance program* (FERA). FERA offers an 18% discount for low-income families who do not meet the income criteria for CARE. The coupling of CARE and FERA essentially creates two tiers of support, similar to the OESP program, but with percentage-based rather than fixed credits.^{xxvi}

A similar program exists for customers of the investor-owned Colorado utility, Xcel Energy, with their *Step Bill Discount (SBD)*. The SBD offers a 25% discount based on the last 12 months of usage to customers at, or above, 150% the Federal Poverty Guidelines (FPG), and a 20% discount for those between 100-150% FPG.^{xxvii}

When considering the level of discount for these programs, there is an inherent trade-off between the number of households served, and size of the benefit. For instance, Seattle Light's *Utility Discount Program* is able to offer a 50% discount on Seattle Light bills to customers at, or below, 70% the state median income.^{xxviii} The eligibility criteria are much narrower for this program compared to some others, however, the benefit is accordingly more generous.

Since assistance levels for percentage rebates are determined using a customer's historic usage, households that face higher energy needs will receive a correspondingly higher benefit. When programs operate on a tiered scale, resources are more likely to be equitably distributed based on the needs of customers. This is an especially important when considering rural, remote, and Indigenous communities which generally face higher energy demand due to energy inefficient housing.

However, unlike a fixed rebate – in which 100% of conservation cost savings to flow to customers – a percentage rebate does not itself incentivize energy conservation. Although limiting one's consumption of electricity would lead to a lowered bill, the percentage rebate received would remain the same. This could arguably hamper parallel efforts to improve the energy efficiency of the home or reduce consumption. In the context of designing a bill protection program, we believe that the equitable distribution of funds to those most in need is important, as not all households will be able to undertake energy upgrades in the short term. However, retrofits can and should still be encouraged through well-designed low-income energy efficiency programs, which complement bill assistance programs.

On-bill credits – Percentage of Income Payment Plans

Rather than a fixed credit or percent discount, certain programs may provide a completely tailored credit. For instance, *Percentage of Income Payment Plans* (PIPP) are bill-assistance programs that limit participating customers' utility bills from surpassing a decided-on percentage of household income (either net or gross depending on the program). PIPP is not the most common type of bill-assistance program, but has been successfully implemented in a few jurisdictions, including Colorado and Illinois.^{xxix} Illinois's PIPP has participating customers (who must have income 200% or less than the US Federal Poverty Guideline) pay 6% of their gross income toward their utility bills, with the remaining difference being covered by a monthly credit of up to \$100.^{xxx} Although the 'energy poverty line' may vary between jurisdictions, 6% of a household's income applied toward meeting energy costs is often suggested as the threshold for energy insecurity in many regions, including British Columbia.

In theory, *Percentage of Income Payment Plans* are promising as they can directly reduce energy insecurity by capping the energy burden of customers to an agreed upon threshold. However, they can be impractical as they involve very high administrative involvement. Since income and usage must both be verified for the benefit amount to be calculated, intense cooperation between the administrators, utilities and the Canada Revenue Agency would be required to implement such a program in BC. Further, due to its design, the program inherently overlooks those who may meet qualitative definitions of 'energy poverty', but whose energy burden falls below 6%. Hence, fully customized credits are administratively less feasible, and practically less effective than certain alternatives.

Energy Conservation Assistance Program (ECAP)

Until the new CleanBC Income Qualified Program was launched, BC's only energy efficiency program targeted to income-qualified homes was the Energy Conservation Assistance Program (ECAP), administered by utilities. Unfortunately, ECAP has not achieved widespread adoption or significant bill savings, with only around 5% of the 350,000 eligible households having participated in the program to date. Of households that do participate in ECAP, the average bill savings amount to less than \$100 per year, and participants are often not eligible for more substantial upgrades that could meaningfully impact their monthly bills.^{xxxi}

Laura MacTaggart, Ecotrust Canada and CUSP's 2021 [in-depth analysis](#) of ECAP revealed that the program is not achieving meaningful reductions in household energy bills, energy usage, or carbon emissions. ECAP customers face barriers in the program application and approval process which keeps them from accessing the program altogether, or from accessing the extent of retrofits they need for meaningful and lasting relief from high energy cost burdens. Several procedural problems emerged during our research, including: the application form and proof of income requirements; the complex program steps and various program administrators involved; and the program recruitment strategy that is reactive rather than active in finding qualified customers.

The 2021 analysis demonstrated several outcomes-based deficiencies common to ECAP and similar programs. These include: performance metrics that are disconnected from bill reductions and thus

meaningful decreases in energy insecurity; program goals that are not ambitious enough to contribute to provincial energy efficiency and poverty reduction targets; and, programs that are designed, implemented and monitored inequitably.

Critically, the ECAP program currently disqualifies households that appear to have one or more safety or structural issues, including the presence of mould, major moisture damage, or other structural deficiencies. This policy is in place for two reasons: first to protect the contractors who deliver ECAP from potential safety hazards, and second due to the inability of BC Hydro to justify non-energy-saving expenditures to the BC Utilities Commission. These issues need to be addressed in a way that opens up eligibility for ECAP to the households that need it the most, which far too often are the very households that are being excluded from the program, primarily due to the presence of mould resulting from poor ventilation and building envelope.

The research findings also revealed common barriers to success, including customer's lack of trust in program administrators (especially utilities), skepticism of offers that seem too good to be true, ineffective recruitment strategies, complex and time-consuming application and approval processes. Utilities often do not recognize the amount of time, trust and education that is needed to drive participation in programs like ECAP.

Currently, no support exists for lower income immigrants who face language, trust, and awareness barriers in accessing ECAP or ESK. Empower Me's market data indicates 220,000 immigrant households in the Lower Mainland would qualify for ESK/ECAP and yet do not have the support they need to access these programs. It is the experience of the signatories of this document that feedback given to utilities from organizations working directly with customers often falls on deaf ears, with utilities unwilling or unable to make meaningful changes to their program design in line with their own commitments to equity and multiculturalism and the principles of procedural, structural, distributional and transgenerational equity.

The experience of our organizations that have been deeply involved in the ECAP program validates this experience, and reinforces the notion that the program remains a largely utility-centric DSM program that does not set or hold itself accountable to effective goals and metrics for the number of households that participate, or the savings that participants ultimately realize. With this in mind, we feel it is appropriate to ask whether a different approach to the program would better serve both participants, and the ratepayers that currently fund ECAP and other DSM programs.

3. The working group has been specifically tasked with providing recommendations to Government regarding BC Hydro's CCF. Do you support the continuation of a program that provides temporary, emergency assistance to households faced with disconnection? Why or why not? Do you have any suggestions for how the current CCF program could be improved or enhanced?

Ecotrust Canada's extensive [2020 review](#) of the Customer Crisis Fund, proposed recommendations for enhancing the current CCF program, including the following:

i. Bring the CCF permanently under the purview of the Provincial Government, while introducing inclusive and transparent eligibility criteria

Credit amount

Ecotrust Canada's consultations with programs in other jurisdictions suggest that the current maximum support levels for BC Hydro's *Customer Crisis Fund* of \$500-600 are appropriate.

Program eligibility and administration

During its first year, BC Hydro's *Customer Crisis Fund* used only 40% of its planned budget, and rejected 64% of applicants. Such figures are not necessarily indicative of overfunding, and certainly not of lack of need, given that approximately 300,000 BC households are currently facing energy insecurity. The inability of the CCF to reach those it aims to assist highlights faults in its eligibility criteria and application approval process. As such, we recommend the following:

- The program and its eligibility criteria should be designed and administered by the BC Government rather than the utility, as they have considerably more experience in social assistance programming and a much clearer mandate to deliver results on BC's poverty reduction strategy.
- Support should be offered on the basis of demonstrated need, rather than household income.
- The program should not require imminent disconnection or ongoing arrears, i.e. the ideal program should prevent such circumstances, rather than necessitate them.
- The program should not require households to completely deplete their assets to be considered eligible.
- The program should outline a comprehensive set of qualitative circumstances that would make one eligible for receiving the support.

- E.g. a qualitatively demonstrated need such as having to choose between feeding one's family and paying energy bills, as is the case with the New Brunswick *Emergency Fuel Benefit*
- The program should ensure all eligibility criteria are clear and public facing.

ii. Introduce an ongoing bill assistance program in British Columbia as an extension of the CCF, administered by the BC Government and utilizing multi-source funding

While the continuation of a one-time emergency bill assistance program like the Customer Crisis Fund is critical, it does not do enough to address the ongoing needs of households that struggle to pay their energy bills. A sustained bill relief program would make a tangible difference to many households' monthly budgets, and provides a necessary stopgap while income-qualified energy efficiency programs ramp up and begin to deliver energy savings to more households.

Such a program is even more important in the context of an anticipated flattening of BC Hydro's rate structure. While the move to a flat rate would benefit many households experiencing energy insecurity, particularly those in rural regions, there is a risk that some urban and apartment-dwelling low-income customers could pay more under a flat rate, if they do not currently incur electricity charges under the Step 2 rate. The needs of these ratepayers must be considered and balanced against the critical need to reduce rates for low-income households that incur Step 2 charges regularly, and the broader need to encourage electrification of heating and transport.

Funding Mechanism

We recommend that bill assistance programs receive multi-source funding to ensure long-term financial sustainability. Many programs have had success through a donation-based funding mechanism, when coupled with government support. As such, we recommend the following funding mechanisms:

- Source the majority of the funding from the provincial tax base
- Consider making use of public and private donations, e.g. customer and utility donations
- Consider a mandatory levy paid by utility ratepayers. If a rate rider is utilized, it may be preferable to combine this charge with the existing administrative fees levied on bills, in order to avoid introducing new bill items

Applicable to electricity bills only

It costs approximately three times more to heat with low-efficiency electric appliances than with natural gas in British Columbia. Limiting the proposed ongoing bill assistance program to electricity usage only would help close the gap between natural gas and electricity costs, thus reducing the energy burden where natural gas is not currently used. Of added benefit, since virtually all energy customers receive electricity bills, broad-based awareness of the program could encourage fuel switching to electricity over the long-term, supporting the province's electrification goals.

Example design for a sliding-scale percentage rebate

Although percentage rebate programs do not provide a signal to conserve energy, we believe that they offer a more equitable bill assistance solution than a fixed credit program, and that energy efficiency can be encouraged through complimentary low-income energy retrofit programs. As such, we recommend the implementation of an ongoing percentage rebate program, functioning on a sliding scale based on household income in relation to the Low-Income Measure. The rebates should be based on the last 12 months of usage, or in the case of a new customer, a regional average.

The lower end of percentage rebates for low-income customers in Ecotrust Canada’s scan of programs was around 20-25%, as is the case with Green Mountain Power and Xcel Energy’s *Energy Assistance Programs*.^{xxxii xxxiii} More generous programs, such as Seattle’s *Utility Discount Program* and FirstEnergy’s *Universal Service Program*, offer between 40-61% discounts to electrically heated households.^{xxxiv xxxv} We found that the average assistance level for percentage rebate programs is approximately 37%. Programs such as California’s CARE and Ontario’s OESP have offered discounts similar to that average, with CARE offering 30-35% for electrically heated households, and OESP offering an average rebate of around 35%.^{xxxvi}

Based on the average assistance levels from our jurisdictional scan, we proposed the following levels as guidelines for the base assistance:

Proposed sliding-scale percentage rebate amounts for BC

Household Income (after tax)	Persons per household						
	1	2	3	4	5	6	7+
60% LIM or less	40%	40%	40%	40%	40%	40%	40%
61% – 80% LIM		35%	35%	35%	35%	35%	35%
81% – 100% LIM		30%	30%	30%	30%	30%	30%
101% – 150% LIM					25%	25%	25%

Providing increased rebate amounts to certain categories of customers, e.g. those heating their homes primarily with electricity

We propose that the maximum rebate increase to 60%, based on the average savings from OESP’s energy intensive sliding scale,^{xxxvii} for households who additionally meet one of the following criteria:

- Households using electricity as the primary fuel for space heating
- Indigenous households
- Households using pre-approved medical devices that require electricity

Other considerations

Were the preceding program to be implemented, the following would need to be considered:

- Program administrators should collaborate with the CRA to enable income verification for program availability as part of a single online application portal.
- Participants should have the option to have their income verified manually, in order to address privacy concerns that some may perceive with an online system.
- The assistance received through the programs should not be considered income for tax purposes.

iii. Streamline and modernize program eligibility criteria — including automatic eligibility and combined applications with other social assistance programs.

Automatic eligibility for recipients of social assistance

To ensure that the proposed bill assistance programs achieve their common goal of supporting vulnerable populations facing energy insecurity, we recommend that in addition to the proposed eligibility criteria, recipients of recognized social assistance programs be automatically eligible to participate in the proposed programs. This should include utility customers that are receiving income assistance, disability assistance and seniors' supplements, to name a few.

Amalgamation of application process for programs with overlapping criteria

To encourage high uptake, and to further remove barriers to access, we recommend that any existing income assistance program with overlapping criteria to the proposed ongoing bill assistance program include an opt-in option to the latter in their application process.

Low-Income Measure (LIM) versus Low-Income Cut-Off (LICO)

LIM is favoured over LICO by advocates and policy experts alike as a more up-to-date framework. As such, we recommend that it be employed for eligibility determination for the proposed bill assistance program.

An honour system

Avoid extensive and intrusive scrutiny of applicants by having the opt-in criteria — such as electric heating and Indigenous identity — operated on an honour system.

4. Do you have any suggestions for how other current energy affordability programs in B.C. could be enhanced or improved? For example, how could programs be made more accessible? What could be done to enable participation?

Given the inclusion of three ministries in this working group - Energy, Mines and Low Carbon Innovation, Social Development and Poverty Reduction and Indigenous Relations and Reconciliation – the

Government has clearly recognized that tackling energy affordability requires a multi-pronged approach which is beyond the DSM mandate given to utilities. It is this multi-pronged approach that informs the following overarching recommendations to improve energy affordability programming in BC:

- The three Ministries should consider the development of a separate agency to run a client centric and outcome-based income-qualified retrofit program. There are many examples of agencies separate from utilities running successful programs in Canada and USA.
- To meet the social and energy efficiency goals of an energy affordability program, all three Ministries and the utilities need to fund the program.
- Government should ensure that a future program be delivered by one or more qualified organizations working within a common framework of objectives, criteria and budgets. The historical centralization of energy efficiency programs in BC has stifled innovation, stymied success, and made the delivery of energy efficiency programs very costly for BC taxpayers and ratepayers.

Energy Conservation Assistance Program (ECAP)

An income-qualified retrofit program which centres equity and home energy security in its mandate and its execution has the potential to catalyze significant retrofit activity in B.C., decrease energy emissions, decrease energy insecurity and improve comfort, health and wellbeing for a significant number of households historically underserved by ratepayer funded retrofit programs.

Critically, a comprehensive retrofit program should consider not just home heating and energy efficiency, but also the role of active cooling in maintaining health, safety and comfort during extreme heat events. This issue will become more severe over time as the climate warms, and many households will not have the funds to perform these critical safety upgrades (such as installing a heat pump with cooling capability) on their own.

The ECAP program is not currently meeting any of these goals, with cost savings to participants from the Basic stream of the program being largely insignificant compared to utility bills overall, and other shelter-related expenses. Although it has the potential to deliver somewhat higher savings, participation in the Advanced stream of ECAP has been “too low to enable statistical analysis”^{xxxviii}. The ECAP program currently sets a startlingly low bar for a ratepayer funded program that impacts the lives of so many low-income families in BC.

Laura MacTaggart, Ecotrust Canada and CUSP’s [in-depth analysis](#) of the ECAP program in 2021 highlighted the poor program outcomes and high costs of ESK and ECAP programs. These programs have been operating in almost the same manner for over 13 years, yet have been largely ineffective at achieving meaningful impacts to energy consumption in the low-income sector.

For these reasons, we therefore suggest that other approaches and models to improve affordability and reduce energy insecurity in BC be explored. We recommend that the role and goals of the ECAP be formally reviewed, such that it delivers meaningful cost savings and improved home health and safety to

participants. While the introduction of CleanBC Income Qualified Program (IQP) rebates is a good first step in filling this gap, a no-cost option in the vein of ECAP should also remain available to lower-income households.

Given utilities' consistent lack of application of equity and justice principles in the delivery of ECAP, and a continuing structural bias and skewed power dynamic between community groups and utilities, we recommend that Government consider the merits of removing this program from utility purview. Rather, no-cost retrofit measures for income-qualified households could be integrated into the existing CleanBC Income Qualified Program, or into the mandate of a newly created energy efficiency agency.

The 2021 [analysis](#) of the ECAP program generated the following additional recommendations for improvement, considering both process-based and outcomes-based changes. The purpose of this project was to identify improvements and alternatives to widely accepted program shortcomings and recommend a viable path forward for an improved income-qualified retrofit program. We encourage readers to consult the analysis in order to further contextualize the below recommendations.

Process-based recommendations

- a. Design program recruitment for the customers the program is trying to reach and the barriers they face in accessing the program.
- b. Create a program application process that is quick, easy and accessible for eligible applicants.
- c. Have regional program coordinators and contractors available to provide quick, efficient and informed support throughout the application and installation process.
- d. Offer funding for comprehensive home retrofits capable of shifting homeowners and renters out of energy insecurity.
- e. Offer curating and navigating support for program participants so they can access and benefit from other complementary rebates and energy saving programs.

Outcomes-based recommendations

- f. Establish per-home targets for reductions in energy use and energy cost burden. Measure and report performance specific to these targets.
- g. Create program goals that align with provincial mandates on energy efficiency, climate change and poverty reduction.
- h. Make the four dimensions of equity (procedural, structural, distributional and transgenerational) central in program design, implementation and evaluation.
- i. Expand the funding model and program guidelines for ECAP, such that it is able to reach households that are currently being disqualified due to the presence of mould or moisture damage.

CleanBC Income-Qualified Program

The introduction of the new Income-Qualified Program is a welcome addition to the Province’s CleanBC initiatives. However, there are still shortcomings to address in this program to better align with principles of equity, and to enable opportunities for savings among households currently paying the highest energy bills.

Because the program offers a higher incentive level to households switching from a fossil fuel furnace or boiler to an electric heat pump system, a significant initial cost gap remains for households that currently rely on electric resistance heating. In our experience, households that use electric baseboards or electric furnaces can face some of the highest energy costs, particularly in the rural context where larger and less efficient detached homes are prevalent. Despite their eligibility for the Income-Qualified Program, many of these households will not be able to complete a heating system retrofit due to this lower incentive amount, as the initial cost barrier remains simply too high. Even for households that are eligible for 90+% cost coverage, the “last mile” costs remain a significant barrier for many households.

Although we appreciate that CleanBC funding is linked to overall emissions reductions, we strongly encourage an equal incentive amount be made available for households switching from electric resistance to a heat pump system, for the purposes of the Income-Qualified Program only. We would also recommend 100% cost coverage for eligible households, which also implies an amalgamation of the IQP and ECAP program, in order to prevent duplication of programming and to maximize impact.

Disconnection policies

Jurisdictions such as Ontario, Quebec, New Brunswick, and Nova Scotia, require notice between 5-14 days prior to disconnection, and impose bans on winter disconnections.^{xxxix xl} Further, the Ontario Energy Board further requires that in most cases customers facing disconnection be offered payment plans,^{xli} and Nova Scotia Power offers medical-based protections against disconnections.^{xlii} Although BC Hydro has implemented a permanent winter disconnection moratorium for some regions, it remains a laggard compared to other jurisdictions. Having the proper protections against disconnections in place for vulnerable populations is paramount to the pursuit of energy security and broader energy justice in British Columbia.

A US organization on the front lines of energy justice, the NAACP Environmental and Climate Justice Program, has highlighted the importance of equitable disconnection policies when addressing systemic barriers around low-income households and racism. Specifically, in their report on reforming utility shut-off policies, the NAACP calls for the eventual elimination of non-payment disconnections, while suggesting comprehensive protections in the interim.^{xliii}

Having the proper protections against disconnections in place for vulnerable populations is paramount to the pursuit of energy security and broader energy justice in British Columbia. As such, we recommend the implementation of a comprehensive and justice-based disconnection policy, with the explicit goal of eliminating non-payment disconnections altogether, through consistency with the following practices:

- Require written (either physical or electronic), and/or in person notices at least 14 days prior to disconnection, and then again at least 48 hours prior.
- Require notice following disconnection.
- Restrict disconnections to weekdays between 8:00am and 2:00pm, to allow for the possibility of same-day reconnections.
- Eliminate reconnection fees.
- Eliminate the requirement of balance payment in full prior to reconnection, i.e. allow partial payment plans to prevent disconnections and support reconnections.
- Facilitate contact with social assistance and bill assistance programs.
- Establish protection programs from disconnections for vulnerable groups.

5. Do you have any suggestions for new energy affordability programs that could be implemented in B.C.?

Review the mandate of the BC Utilities Commission (BCUC)

The BCUC is guided by an outdated model of regulation that takes an extremely limited view of ratepayer protection, forbidding it from approving or prescribing expenditures that might advance key policy goals including:

- Decarbonization of the energy system at a pace consistent with BC’s legislated emissions targets.
- Driving fuel switching in key sectors of the economy including buildings and transportation.
- Advancing equity and anti-poverty goals by ensuring low-income households have secure, affordable access to energy.

As a timely review of the *Utilities Commission Act* is likely necessary in order to fully implement the recommendations of the BCUC’s *Indigenous Utilities Inquiry*, the mandate of the BCUC should be reconsidered in light of these broader objectives as well. The *Act* should be comprehensively updated and modernized to reflect the changing nature of energy provision and pricing, in line with work done in other jurisdictions including by the California Public Utility Commission.

We recommend that the BCUC be empowered to direct the creation of an income-qualified electricity rate (or “lifeline rate”), based on the principle of an essential services consumption block. The introduction of a new rate class could eventually eliminate the need for a government-administered ongoing bill assistance program.

Create a third-party retrofit agency or “energy efficiency utility”

Much of demand-side management (DSM) and/or energy efficiency programming in BC remains under the purview of utilities, including BC Hydro and FortisBC. Because such programs are funded by ratepayers, their existence must be justified to the BC Utilities Commission (BCUC) as generating an economic benefit to ratepayers. This is a perverse system that incentivizes energy efficiency programs to pursue the lowest hanging fruit through shallow retrofits that pay back quickly but deliver little meaningful energy bill savings to participants.

All DSM programs administered by utilities must pass prescriptive cost-effectiveness tests in order for a ratepayer-funded program to be approved by the BCUC. These “resource cost tests” in some cases have modifiers applied to them that allow utilities to justify a certain amount of spending on, for example, low-income energy efficiency programs that do not deliver the expected level of savings to ratepayers.

However, the fundamental structure of the regulation is such that all ratepayer expenditures must be justified on a primarily economic basis to the BCUC. This is not an effective pathway to delivering meaningful retrofit project support and bill savings to low-income customers; nor does it adequately incentivize customers to switching their space and water heating from fossil fuel-fired to electric appliances.

Other organizations, notably the Movement of United Professionals (MoveUP), have proposed as a solution the creation of a new Crown corporation that would be responsible for coordinating all aspects of energy efficiency, electrification and retrofit programming in the province. Such an agency would operate similarly to equivalents in other provinces, such as EfficiencyPEI and Efficiency Nova Scotia.

There are some advantages to the ratepayer-funded model that utility DSM programs currently operate under. Chief among these is the ability to recover program costs through general rates, which represent a stable and predictable revenue stream and enable long-lasting programs. Compared to taxpayer-funded initiatives, this structure is less vulnerable to political shifts and fluctuating budgets. However, the cost-effectiveness tests that the BCUC currently requires limit the depth of support that can be provided to households experiencing energy insecurity.

One possible solution to this dilemma is to require that utilities contribute to a central energy efficiency fund through a levy on utility bills, with revenues being used to fund the programs and operation of an independent energy efficiency agency. Such an agency need not be directly controlled by government; a number of other jurisdictions utilize a third-party administrator model, which can be thought of as establishing an “energy efficiency utility”, tasked with delivering retrofit programs and funded through utility rate riders.

In parallel with these considerations, we also recommend that the BCUC be given new regulatory tools to increase the greenhouse gas (GHG) emissions cap for natural gas utilities introduced in [the Roadmap to 2030](#), at a pace consistent with the achievement of legislated climate targets. The BCUC should also be directed to prevent the lock-in of any new natural gas distribution infrastructure in the absence of a clear plan to fully meet this demand with renewable natural gas and/or hydrogen at a price competitive with clean electricity.

Implement arrearage forgiveness programs

Some effective bill assistance programs, namely Green Mountain Power's *Energy Assistance Program*, as well as Xcel Energy's *Step Bill Discount* and *Percentage of Income Payment Plan*, are paired with an arrearage forgiveness program. Encompassing the three general types of arrearage assistance approaches, they are designed as followed:

- Green Mountain Power's Energy Assistance Program is coupled with full arrearage forgiveness.^{xliv}
- Xcel Energy's Step Bill Discount offers up to \$200 towards arrears.
- Xcel Energy's PIPP offers a credit designed to eliminate arrears customers over 12 months for customers with arrears of \$500 or less; or over 24 months for customers with outstanding balances over \$500.^{xlv}

These programs allow participants the opportunity to escape energy insecurity through a fresh start. We believe that arrearage forgiveness programs should be considered as an important component of an effective energy affordability framework.

It is important that through their participation in the proposed ongoing bill assistance program, customers receive a clean slate, and be given the opportunity to escape the hardships of energy insecurity. Thus, we recommend coupling the proposed ongoing assistance plan with an arrearage forgiveness program based on one of the following designs:

- Participants receive full arrear forgiveness upon joining the proposed ongoing protections program.
- Participants receive credits equal to a percentage of their arrears for each consecutive month of bill payment, reducing the outstanding balance to zero over 12-24 months.
- Participants receive a one-time credit toward the payment of their arrears.

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