

**DEMANDE DE RENSEIGNEMENTS N° 1 DU DISTRIBUTEUR RELATIVE À  
L'ÉTABLISSEMENT DES TARIFS D'ÉLECTRICITÉ POUR L'ANNÉE TARIFAIRE 2013-2014  
DOSSIER R-3814-2012**

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- 1. Référence :**
- (i) C-UC-0015, Mémoire de Union des consommateurs (UC), p. 34.
  - (ii) C-UC-0016, Annexe 1 du mémoire d'UC.

**Préambule :**

- (i) « *Un second échange de courriel entre NICOR Gas nous confirme pourtant que " due to laws changing, NICOR no longer is credit reporting on our residential accounts."* »  
(Note omise)

**Demandes :**

- 1.1** UC dispose-t-elle ou a-t-elle cherché à obtenir auprès de NICOR des précisions quant aux changements législatifs auxquels celle-ci faisait allusion dans son courriel (référence ii) ? Le cas échéant, veuillez préciser quels sont ces changements.
- 1.2** UC connaît-elle ou a-t-elle cherché à connaître les États américains touchés par ces changements législatifs ? Le cas échéant, veuillez les nommer, en précisant quels sont les changements pour chacun d'eux.

**2. Références :**

- (i) C-UC-0015, Mémoire de Union des consommateurs (UC), p. 30-31.
- (ii) Michael TURNER, Patrick D. WALKER, Sukanya CHAUDHURI, Robin VARGHESE, *A New Pathway to Financial Inclusion: Alternative Data, Credit Building, and Responsible Lending in the Wake of the Great Recession*, PERC, juin 2012.
- (iii) Michael TURNER, Patrick D. WALKER, Sukanya CHAUDHURI, Robin VARGHESE, *The Credit Impacts on Low-Income Americans from Reporting Moderately Late Utility Payments*, PERC, août 2012.

**Préambule :**

- (i) Aux pages 30 et 31 de son mémoire, UC cite l'extrait suivant d'un document publié par le *National Consumer Law Center (NCLC)* :

*« Full utility credit reporting will cause disproportionate harm to low-income consumers. The practice will undermine the policy objectives of state utility consumer protections. Additionally there will be inconsistencies due to varying state utility credit and collection rules, home energy prices and availability of low-income energy assistance programs. These disparities will unfairly penalize some low-income consumers under full utility credit*

*reporting. Full utility credit reporting should be prohibited by state and federal policymakers absent a consumer opt-in mechanism. » (Note omise)*

(ii) Les auteurs arrivent notamment à la conclusion que :

*« [...] the largest net beneficiaries in terms of improved credit access are lower income Americans, members of minority communities, and younger and elderly Americans. » (p. 6)*

*« Consumers with a public record including a bankruptcy and/or very late payments (90+ days late) among the traditional accounts reported to CRAs, witnessed more score increases than decreases (55% versus 30%) when alternative data were included in their credit files. » (p. 6)*

*« Hence, it can be concluded that not reporting alternative data at all leaves credit scores unchanged, negative-only reporting tends to lower scores, and full-file alternative data reporting tends to raise scores, and raise scores disproportionately for thin file consumers and member of low-income households. » (p. 20)*

(iii) En août 2012, le PERC a publié une analyse statistique des impacts sur les clients à faible revenu de la transmission des données de crédit aux AÉC. Les auteurs y affirment notamment que :

*« A recent release by the National Consumer Law Center (NCLC) offers many assertions about harms that “could” befall low-income persons without direct evidence, relying instead on anecdotes and hypotheticals. » (p. 7)*

*« Excluding fully reported utility data (both timely and late payments) from consumer credit reports would negatively impact the credit scores of far more low-income consumers than would including the data. Contrary to the assertion that fully reporting utility payment data to nationwide credit bureaus presents risks to low-income consumers, we find that far more low-income consumers witness credit score increases than decreases with full utility credit reporting. » (p. 8)*

*« When such information alone is included in a credit report, for those with little or no credit history, there is no ability to offset the affect of a serious delinquency or derogatory like a collection. Including only negative data is akin to creating a black list, and it is a very unforgiving approach to risk assessment that is especially hard on lower income Americans. » (p. 19)*

## **Demandes :**

**2.1** UC sait-elle ou a-t-elle cherché à savoir si le NCLC, à l'instar du PERC (références ii et iii), a fait une analyse statistique ou s'il dispose d'une étude empirique au soutien de ses affirmations apparaissant à la référence i ? Le cas échéant, veuillez déposer au dossier cette analyse ou cette étude.