

# **Comments to the U.S. Energy Information Administration on Agency Information Collection Extension for Electric Power & Renewable Electricity Surveys**

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The U.S. Energy Information Administration (EIA) seeks comments on its request for an agency information collection extension for its Electric Power & Renewable Electricity Surveys. We support the continuation of these surveys, which provide valuable information for government agencies, private firms, nonprofit organizations, researchers, and citizens. As part of future data collection efforts, we also urge the EIA to add items to the Form EIA-861 *Annual Electric Power Industry Report*. Specifically, we request that the EIA collect information in the area of utility service disconnections, which we know from our research is critical for understanding the prevalence and patterns of household energy insecurity.

In this comment, we first show that household energy insecurity, including utility disconnections, are an important issue. We next explain that there is no current national level mechanism to systematically and consistently collect key indicators of utility disconnections. We then enumerate the specific utility disconnection-related items that the Form EIA-861 should include.

## **I. Household energy insecurity**

Energy insecurity – the inability of a household to meet its basic energy needs because of financial hardship – is an increasingly recognized form of material hardship (1-4). In the United States, studies have demonstrated that household energy insecurity is prevalent, particularly among vulnerable segments of the population (5-8), and can have a variety of adverse consequences for well-being, including harmful physical and mental health effects (9-13).

Current studies of energy security rely mostly on periodic government-sponsored surveys such as the EIA's Residential Energy Consumption Survey and the Census Bureau's Household Pulse Survey or surveys designed and administered by researchers. We have conducted these types of surveys through our work at the Energy Justice Lab at Indiana University (14).

The most recent RECS study (data collected in 2020) shows that one in five American households reported having to reduce or forgo medicine or food to pay energy costs and that one in ten households received a disconnect or delivery stop notice from their utility due to nonpayment (15). The RECS study also reveals disparities; people of color and low-income households, for example, are both more likely to experience energy insecurity. The Household

Pulse Survey shows similar patterns. The most recent round of data collection indicates that 22 percent of households were unable to pay an energy bill in full between November 2-14 2022.

Surveys such as the RECS and Household Pulse Survey collect several relevant indicators of energy insecurity, but they do not collect information on the number of households that utilities disconnect from service, or important risk factors, such as the number of residential customer accounts that are in arrears. Moreover, the information that these government-sponsored surveys do collect are not available with sufficient temporal and spatial specificity to understand utility-level patterns. These data would be most economically provided by the utilities themselves.

## II. Data availability

There is no current, nationally-consistent source of data on utility disconnections, and related items. Rather, the data that do exist are available in response to state-specific disclosure requirements put in place either through state legislation or standing or emergency orders from public utility commissions. In particular, many public utility commissions required reporting of utility disconnections during the COVID pandemic, usually as part of temporary moratoria on disconnections.

The specific items mandated for reporting varied from state to state, but generally included items such as the number of residential accounts in arrears, the number of disconnection notices sent, the number of disconnections executed due to nonpayment, and the number of reconnections within twenty-four hours. Most often, public utility commissions required regulated utilities to report this information on a monthly basis, and in some cases required the reporting of limited historical data as well so as to provide a baseline for understanding patterns during COVID.

Some of these reporting requirements were intended to be temporary and ended around the same time as the disconnection moratoria, whereas others have continued to the present. In several states, such as Indiana, Minnesota, and New Jersey, new reporting requirements have been recently established through either legislation or public utility commission orders. It is also important to note that, to our knowledge, seventeen states have never required disclosure of utility disconnection data.

Table 1 below presents our best understanding of the availability of current utility disconnection data, based on research we have done at the Energy Justice Lab at Indiana University.

**Table 1. States and time periods of available information on utility disconnections**

State/Reporting years	AZ (2019-), CA (2010-2018, 2018-), CO (2008-), CT (2020-2022), DC (2005-), FL (2020-2021), GA (2019-), IL (2020-), IN (2020-2022), IA (2013-), KS (2018-), KY (2020-2021), ME (2012-), MD (2020-), MA (2020-), MI (2020-), MN (2020-), MO (2020-), MT (2020), NH (2010-2019), NM (2020-), NY (1991* - ), NC (1975-), ND (2008-), OH (2015**-), OR (2018-), PA (2020-), RI (2017-***), SC (2006-), SD (2020-2021), UT (2000-2021), VT (2006**** - , 2020-), WA (2020-), WI (2020-)
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\* New York reporting begins in 1991, but reporting documents are not available prior to March 2016.

\*\* Ohio reports each year in a separate docket. The law instituting the reporting took effect in 1986, however, the reports are not easily accessible prior to 2015.

\*\*\* Rhode Island reporting begins in 2017, but reports are accessible only by contacting the RIPUC to request download.

\*\*\*\* Vermont reporting in compliance with VTPUC Rule 3.308(A) is instituted as of 2006, however, these data are not readily accessible through Vermont's public docketing system. Vermont also opened a mandatory reporting docket, 20-0703-PET, during the COVID-19 pandemic

### **III. Items that should be added to the Form EIA-861**

To better understand and track utility disconnections, we recommend that the EIA add a new section to the Form EIA-861 that consists of the following eight items:

1. Number of residential customer accounts;
2. Number of residential accounts that are 30, 60+, and 90+ days delinquent;
3. Total balance associated with residential accounts that are 30+, 60+, and 90+ days delinquent;
4. Number of residential customers on active payment plans;
5. Total balance associated with residential accounts in active payment plans;
6. Number of residential disconnection notices sent for non-payment;
7. Number of residential disconnections for non-payment; and
8. Number of residential reconnections associated with accounts disconnected for non-payment

We further recommend that utilities report these data for each month of the preceding year, and at several levels of geography, including utility service territory level, zip code level, and census tract level.

Many utilities reported these indicators in response to state-level, COVID-related disclosure requirements, which suggests that doing so is not overly-burdensome.

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