

**From:** [EIA112](#)  
**To:** ["Donna Albert"](#)  
**Subject:** RE: [EXTERNAL] EIA-112 comment  
**Date:** Tuesday, September 10, 2024 10:10:00 AM

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Donna,

Thank you for submitting a comment on the Residential Utility Disconnections Survey.

Congress tasked the U.S. Energy Information Administration with determining if collecting disconnection data from natural gas and electric utilities is feasible. We will invite utilities of various ownership types (investor-owned, municipal, cooperative, etc.) to complete the survey. We performed extensive pretesting to see which data we could reasonably collect and at what level of detail. We determined that we can collect the data annually at the monthly level without undue burden to the utilities. We also determined that data collected at the state level by utility to be the most effective geographic increment. We plan to publish data at the utility level and aggregate it to the state, census division, and national levels.

Assuming the Office of Management and Budget (OMB) approves the survey, we will start collecting disconnection data for 2024 in early 2025.

Marc Harnish

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

From: Donna Albert <donna.albert@gmail.com>  
Sent: Friday, August 9, 2024 2:49 AM  
To: EIA112 <EIA112@eia.gov>  
Subject: [EXTERNAL] EIA-112 comment

I understand a survey is proposed which would inform a nationwide federal database of utility shutoffs. Please do this. I was shocked to hear that an elderly woman in Arizona died in terrible heat when her electricity was cut off because she owed \$51. That is cruel and should not be legal. Transparency can expose these unfair and cruel utility shutoffs. Please do everything you can to make utility shutoff data public. Please also make it easy to access. Make it useful by including zip code and county. Provide for distributing it to agencies, organizations, and communities who can use this data to stop these abuses. Thank you. — Donna Albert, Montesano, WA

Sent from my iPhone

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**From:** [EIA112](#)  
**To:** [Cara Cooper](#)  
**Subject:** RE: [EXTERNAL] public support for EIA112 survey  
**Date:** Tuesday, September 10, 2024 10:07:00 AM

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Cara,

Thank you for submitting a comment on the *Residential Utility Disconnections Survey*.

Congress tasked the U.S. Energy Information Administration with determining if collecting disconnection data from natural gas and electric utilities is feasible. We will invite utilities of various ownership types (investor-owned, municipal, cooperative, etc.) to complete the survey. We performed extensive pretesting to see which data we could reasonably collect and at what level of detail. We determined that we can collect the data annually at the monthly level without undue burden to the utilities. We also determined that data collected at the state level by utility to be the most effective geographic increment. We plan to publish data at the utility level and aggregate it to the state, census division, and national levels.

Assuming the Office of Management and Budget (OMB) approves the survey, we will start collecting disconnection data for 2024 in early 2025.

Marc Harnish

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**From:** Cara Cooper <caracooper001@gmail.com>  
**Sent:** Tuesday, July 16, 2024 12:58 PM  
**To:** EIA112 <EIA112@eia.gov>  
**Subject:** [EXTERNAL] public support for EIA112 survey

Hi!

As someone who works in public advocacy around energy affordability in Kentucky I want to voice my support for the disconnections data survey.

Having more data on utility disconnections not only helps us to better understand the bigger picture of what is happening in terms of energy access and affordability. And the more granular that data can be, the better. For example, utilities should have to make their data sortable by zip code or census tract, so that we can see patterns in disconnections related to race and socio-economic status.

Thanks!

<3 Cara

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**Cara Cooper**  
Environmental Studies, MS  
Coordinator, Kentuckians for Energy Democracy  
Coordinator, KY Just Transition Coalition  
859-242-6435

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**From:** [EIA112](#)  
**To:** [Evelyn Hutt](#)  
**Subject:** RE: Form EIA112 - in favor  
**Date:** Tuesday, September 10, 2024 10:04:00 AM

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Evelyn,

Thank you for submitting a comment on the *Residential Utility Disconnections Survey*. Congress tasked the U.S. Energy Information Administration with determining if collecting disconnection data from natural gas and electric utilities is feasible. We will invite utilities of various ownership types (investor-owned, municipal, cooperative, etc.) to complete the survey. We performed extensive pretesting to see which data we could reasonably collect and at what level of detail. We determined that we can collect the data annually at the monthly level without undue burden to the utilities. We also determined that data collected at the state level by utility to be the most effective geographic increment. We plan to publish data at the utility level and aggregate it to the state, census division, and national levels.

Assuming the Office of Management and Budget (OMB) approves the survey, we will start collecting disconnection data for 2024 in early 2025.

Marc Harnish

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**From:** Evelyn Hutt <lilith@indra.com>  
**Sent:** Thursday, June 27, 2024 4:49 PM  
**To:** EIA112 <EIA112@eia.gov>  
**Subject:** [EXTERNAL] Form EIA112 - in favor

Dear Colleagues, I'm writing to express my endorsement for Form EIA112. It is critical to have reliable data on utility shutoffs, particularly since, they are likely to become more common and costly as the climate changes. This Form will provide the first-ever federal database to track utility shutoffs nationwide.

Access to utilities like electricity is a human right. Yet these life-saving services remain unaffordable and inaccessible for countless families across the country.

Persistent data gaps at the national level continue to mask the true magnitude of utility injustices. Indiana University's Energy Justice Lab [documented](#) at least 2 million shutoffs for non-payment last year among American households. On an annual basis, they expect that figure to be closer to 3 million. Similarly, in 2022, the Center for Biological Diversity [found](#) that households still reeling from the pandemic were deprived of their electricity service at least 5.7 million times between January 2020 and October 2022. However, these findings only capture a portion of nationwide utility shutoff totals because 40% (20) of states fail to require utilities to disclose their residential electric and gas shutoffs for non-payment. Even among the 30 states that do require disclosures, as of 2023, only 13 mandated clear, standardized, and

monthly data.

The EIA must ask respondents to aggregate their data by zip code, county, census tract, or other comparable geographic metrics to shed light on the persistent race and class disparities of utility shutoffs.

Discriminatory planning practices—tied to the ongoing legacy of racist redlining and other forms of structural racism—have disproportionately [concentrated](#) Black, Hispanic, Indigenous, and other communities of color in structurally deficient homes that are costlier to keep cool and warm. As a result, these households [spend](#) significantly more of their monthly income on energy bills; have higher frequencies of disconnections; and are more likely to forego other necessities to pay for their energy bills compared to their white and often higher-income counterparts.

Although utility shutoffs are severe, they are ultimately just one piece of the energy insecurity puzzle. Well before a struggling household is shut off from their utility, they endure the crippling effects of piling utility debt. Overdue bills can lock families into endless cycles of poverty and pressure them to make [impossible choices](#) about how to spend their limited money. Some families are forced to sacrifice medicine or nutritious food to keep their homes cool or warm. Others are compelled to let their homes reach dangerous temperatures to save money or turn to potentially perilous heating alternatives in the winter, like stoves, ovens, and space heaters. NEADA [found](#) that over 21 million households (16%) are behind on their energy bills, with arrearages surpassing \$20 billion as of the end of last year.

Given the enormous scale of national energy unaffordability, the survey should include more data on customer debt to clarify the harmful impact of predatory credit and collection policies at the state and utility levels.

Thank you for your attention to this detail as you construct Form EIA112.

Sincerely,

Evelyn Hutt, MD

825 Jasmine St

Denver, CO 80220

[lilith@indra.com](mailto:lilith@indra.com)

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**From:** [EIA112](#)  
**To:** [Bari Levinson](#)  
**Subject:** RE: [EXTERNAL] Please share shut-off data  
**Date:** Tuesday, September 10, 2024 10:07:00 AM

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Bari,

Thank you for submitting a comment on the *Residential Utility Disconnections Survey*.

Congress tasked the U.S. Energy Information Administration with determining if collecting disconnection data from natural gas and electric utilities is feasible. We will invite utilities of various ownership types (investor-owned, municipal, cooperative, etc.) to complete the survey. We performed extensive pretesting to see which data we could reasonably collect and at what level of detail. We determined that we can collect the data annually at the monthly level without undue burden to the utilities. We also determined that data collected at the state level by utility to be the most effective geographic increment. We plan to publish data at the utility level and aggregate it to the state, census division, and national levels.

Assuming the Office of Management and Budget (OMB) approves the survey, we will start collecting disconnection data for 2024 in early 2025.

Marc Harnish

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**From:** Bari Levinson <barilevinson111@gmail.com>  
**Sent:** Thursday, August 8, 2024 8:38 PM  
**To:** EIA112 <EIA112@eia.gov>  
**Subject:** [EXTERNAL] Please share shut-off data

To the EIA:

I am writing as a concerned citizen and resident of Nevada. I am also a leader in Sierra Club, the nation's largest grassroots environmental organization. We are concerned about climate change and environmental justice.

I am requesting that the EIA provide data publicly that lists the utility shut-offs by community (or zip code). This type of transparency will help the utilities, their regulators and our legislators make much more informed decisions.

Unfortunately, it is the underprivileged residents that suffer most due to power shut-offs. We understand that people have died as a result of these shut-offs, often due to small dollar amounts owed to the utilities.

Given climate change, with the increasing temperatures (and Nevada has the top 2 fastest warming cities in the nation), access to electricity needs to be considered a human right. We need the shut-off data shared nationally for consistent standards for utilities, and to hold them accountable for their actions.

Thank you for your consideration.

Sincerely,  
Bari Levinson, MD  
Co-Chair Legislative Committee  
Co-Chair, Political Committee  
Sierra Club Nevada

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**From:** [EIA112](#)  
**To:** [Meghan Pierce](#)  
**Subject:** RE: [EXTERNAL] Comment for the Energy Information Administration's Residential Utility Shutoff Survey  
**Date:** Tuesday, September 10, 2024 10:06:00 AM

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Meghan,

Thank you for submitting a comment on the *Residential Utility Disconnections Survey*.

Congress tasked the U.S. Energy Information Administration with determining if collecting disconnection data from natural gas and electric utilities is feasible. We will invite utilities of various ownership types (investor-owned, municipal, cooperative, etc.) to complete the survey. We performed extensive pretesting to see which data we could reasonably collect and at what level of detail. We determined that we can collect the data annually at the monthly level without undue burden to the utilities. We also determined that data collected at the state level by utility to be the most effective geographic increment. We plan to publish data at the utility level and aggregate it to the state, census division, and national levels.

Assuming the Office of Management and Budget (OMB) approves the survey, we will start collecting disconnection data for 2024 in early 2025.

Marc Harnish

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**From:** Meghan Pierce <meghan.pierce92@gmail.com>  
**Sent:** Tuesday, July 9, 2024 8:28 PM  
**To:** EIA112 <EIA112@eia.gov>  
**Subject:** [EXTERNAL] Comment for the Energy Information Administration's Residential Utility Shutoff Survey

Hello,

Please see my comment for the Energy Information Administration's Residential Utility Shutoff Survey:

Alarming, the Energy Justice Lab at Indiana University found that American households were disconnected from their electricity or gas due to non-payment at least 2 million times last year.

The climate catastrophe is set to intensify this utility shutoff crisis as NEADA estimates that blistering temperatures will force summer cooling costs to increase by almost 8% this year—a particularly deadly prospect for low-income households and households of color. Yet, most states lack utility shut-off restrictions during periods of extreme heat.

With another wave of shutoffs looming, it is imperative that we have data to bolster our fight to end energy poverty.

The EIA must ask respondents to aggregate their data by zip code, county, census tract, or other comparable geographic metrics to shed light on the persistent race and class disparities of utility shutoffs.

Even after the pandemic, this crisis persists as profit-driven utilities prioritize their bottom line over ensuring access to a public good. No one should have to forego basic needs to keep the lights on.

By delivering much-needed data transparency on the scale and nature of our country's utility shutoff crisis, the survey can also bolster the efforts of utility justice advocates and public officials who fight for more transformative and longer-lasting solutions to energy poverty

Persistent data gaps at the national level continue to mask the true magnitude of utility injustices. 40% (20) of states fail to require utilities to disclose their residential electric and gas shutoffs for non-payment.

Greater access to granular utility shutoff data would empower utility justice advocates and public officials to meaningfully remedy these racial and economic inequities through targeted policy interventions and investments.

Given the enormous scale of national energy unaffordability, the survey should include more data on customer debt to clarify the harmful impact of predatory credit and collection policies at the state and utility levels. Some examples include data on customer arrearage totals; charges (deposits, late fees, reconnection fees, etc.); deferred payment plans (total number of customers, total amount owed, number of customers who defaulted, etc.); and accounts referred to debt collection companies and/or flagged for credit reporting agencies.

Thank you for your time,  
Meghan Pierce

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**From:** [EIA112](#)  
**To:** [Tracy Rosenberg](#)  
**Subject:** RE: [EXTERNAL] Comments for the Energy Information Administration's Residential Utility Shutoff Survey  
**Date:** Tuesday, September 10, 2024 10:06:00 AM

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Tracy,

Thank you for submitting a comment on the *Residential Utility Disconnections Survey*.

Congress tasked the U.S. Energy Information Administration with determining if collecting disconnection data from natural gas and electric utilities is feasible. We will invite utilities of various ownership types (investor-owned, municipal, cooperative, etc.) to complete the survey. We performed extensive pretesting to see which data we could reasonably collect and at what level of detail. We determined that we can collect the data annually at the monthly level without undue burden to the utilities. We also determined that data collected at the state level by utility to be the most effective geographic increment. We plan to publish data at the utility level and aggregate it to the state, census division, and national levels.

Assuming the Office of Management and Budget (OMB) approves the survey, we will start collecting disconnection data for 2024 in early 2025.

Marc Harnish

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**From:** Tracy Rosenberg <tracy@media-alliance.org>  
**Sent:** Tuesday, July 9, 2024 12:54 PM  
**To:** EIA112 <EIA112@eia.gov>  
**Subject:** [EXTERNAL] Comments for the Energy Information Administration's Residential Utility Shutoff Survey

These informal comments are submitted on behalf of Media Alliance, a California 501c3 advocacy organization located in the San Francisco Bay Area.

Media Alliance is a Bay Area democratic communications advocate. Our members include professional and citizen journalists and community-based media and communications professionals who work with the media. Our members are concerned with communications rights, especially at the intersections of class, race and marginalized communities.

The data from form EIA-112 can achieve far more than the EIA's stated goal of aiding decisions regarding budgetary support for the Low-Income Heating Energy Assistance Program (LIHEAP). By delivering much-needed data transparency on the scale and nature of our country's utility shutoff crisis, the survey can also bolster the efforts of utility justice advocates and public officials who fight for more transformative and longer-lasting solutions to energy poverty—like utility shutoff bans, income-based debt relief and management programs, increased funding for the Weatherization

Assistance Program (WAP), equitable rate restructuring, and the equitable deployment of distributed energy resources (DERs).

Indiana University's Energy Justice Lab [documented](#) at least 2 million shutoffs for non-payment last year among American households. On an annual basis, they expect that figure to be closer to 3 million. Similarly, in 2022, the Center for Biological Diversity [found](#) that households still reeling from the pandemic were deprived of their electricity service at least 5.7 million times between January 2020 and October 2022. However, these findings only capture a portion of nationwide utility shutoff totals because 40% (20) of states fail to require utilities to disclose their residential electric and gas shutoffs for non-payment. Even among the 30 states that do require disclosures, as of 2023, only 13 mandated clear, standardized, and monthly data.

This utility debt and shutoff crisis is growing increasingly dire as utilities continue to burn expensive fossil fuels contributing to more extreme weather events, like heat waves and cold snaps, that make access to utilities to cool and warm our homes even more crucial. And this crisis is not equally felt – low-income communities and communities of color are disproportionately burdened by shutoffs, rising utility debt, and climate disasters.

The EIA must ask respondents to aggregate their data by zip code, county, census tract, or other comparable geographic metrics to shed light on the persistent race and class disparities of utility shutoffs.

Our constituents often work at home and often rely on communication services that require reliable access to electricity and telecommunications services. Utility shut offs have direct and severe impacts on their ability to earn their living. We need this data for intentional policy interventions to keep people warm and cool, safe, and employed in our increasingly challenging utility landscape.

Respectfully,

Tracy Rosenberg  
Media Alliance

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Tracy Rosenberg  
Executive Director  
Media Alliance  
2830 20th Street Suite 201  
San Francisco, CA 94110  
<https://media-alliance.org>  
Email: [tracy@media-alliance.org](mailto:tracy@media-alliance.org)  
415-746-9475 (office)

510-684-6853 (cell)

Encrypted email at [tracy.rosenberg@protonmail.com](mailto:tracy.rosenberg@protonmail.com)

Text via Signal

Pronouns: She/Her/Hers

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