From:	EIA112
To:	Sarah Albertini-Bond
Subject:	RE: [EXTERNAL] Supporting basic needs for all - Residential Utility Disconnections Survey Comments
Date:	Tuesday, September 10, 2024 10:27:00 AM

Sarah,

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.
During pretesting, we did not ask questions about customer debt or arrearages. If approved, this survey will be valid for the usual three-year period, at which time we will resubmit the survey to the Office of Management and Budget (OMB) for another approval. For future cycles of this survey, we can consider adding more questions, to the extent that:

- Pretesting supports them
- They are of interest to the public
- They are within scope and achievable given resource constraints and respondent burden

Assuming OMB approves the survey, we will start collecting the disconnection data for 2024 in early 2025.

Marc Harnish

From: Sarah Albertini-Bond <serendipity77@gmail.com>
Sent: Monday, August 19, 2024 3:00 PM
To: EIA112 <EIA112@eia.gov>
Subject: [EXTERNAL] Supporting basic needs for all - Residential Utility Disconnections Survey Comments

Dear Marc Harnish,

As a resident of Virginia, I would like to comment in support of this survey initiative because it will provide much-needed data transparency about the scale and nature of utility shutoffs that impact residents all over Virginia. Nationally, there has been inconsistency in regulation and reporting of utility shutoffs due to non-payment. My hope is that this survey will help to

standardize the data that is provided. There are, however, other items that must be addressed in order to ensure energy justice for all.

One issue I hope that the survey will shed light on is the inequities embedded in a racist energy system. Systemic racism in public energy is tied to the legacy of redlining and other discriminatory practices. Because of this, I am asking that the survey ask respondents to aggregate their data by zip code, county, or other comparable geographic metrics to shed light on the persistent race and class disparities of utility shutoffs.

Additionally, I ask that the utility debt data will be used to help to make energy more affordable for all Virginians. The pandemic called increased attention to the issue of energy affordability, during which many families were tragically required to decide between feeding their families and paying energy bills. 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. Thus, the survey should also include more data on customer debt to clarify the harmful impact of predatory credit and collection policies at the state and utility levels.

For the sake of my community, I am asking that these crucial items be addressed in the Residential Utility Disconnections Survey.

Thank you for your consideration.

Sincerely,
Sarah Albertini-Bond
5224 Fairfield Blvd
Virginia Beach, VA 23464

From:	EIA112
To:	Karen Causey
Subject:	RE: [EXTERNAL] Supporting basic needs for all - Residential Utility Disconnections Survey Comments
Date:	Tuesday, September 10, 2024 10:21:00 AM

Karen,

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.
During pretesting, we did not ask questions about customer debt or arrearages. If approved, this survey will be valid for the usual three-year period, at which time we will resubmit the survey to the Office of Management and Budget (OMB) for another approval. For future cycles of this survey, we can consider adding more questions, to the extent that:

- Pretesting supports them
- They are of interest to the public
- They are within scope and achievable given resource constraints and respondent burden

Assuming OMB approves the survey, we will start collecting the disconnection data for 2024 in early 2025.

Marc Harnish

From: Karen Causey <karen.causey@outlook.com>
Sent: Friday, July 26, 2024 10:44 AM
To: EIA112 <EIA112@eia.gov>
Subject: [EXTERNAL] Supporting basic needs for all - Residential Utility Disconnections Survey Comments

Dear Marc Harnish,

As a resident of Virginia, I would like to comment in support of this survey initiative because it will provide much-needed data transparency about the scale and nature of utility shutoffs that impact residents all over Virginia. Nationally, there has been inconsistency in regulation and reporting of utility shutoffs due to non-payment. My hope is that this survey will help to

standardize the data that is provided. There are, however, other items that must be addressed in order to ensure energy justice for all.

One issue I hope that the survey will shed light on is the inequities embedded in a racist energy system. Systemic racism in public energy is tied to the legacy of redlining and other discriminatory practices. Because of this, I am asking that the survey ask respondents to aggregate their data by zip code, county, or other comparable geographic metrics to shed light on the persistent race and class disparities of utility shutoffs.

Additionally, I ask that the utility debt data will be used to help to make energy more affordable for all Virginians. The pandemic called increased attention to the issue of energy affordability, during which many families were tragically required to decide between feeding their families and paying energy bills. 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. Thus, the survey should also include more data on customer debt to clarify the harmful impact of predatory credit and collection policies at the state and utility levels.

For the sake of my community, I am asking that these crucial items be addressed in the Residential Utility Disconnections Survey.

Thank you for your consideration.

Sincerely,
Karen Causey
5322 Pandoria Ave Virginia Beach
Virginia Beach, VA 23455

From:	Peggy Costello -OPC-
To:	EIA112
Cc:	David Lapp -OPC-; Juliana Bell -OPC-; Brandi Nieland -OPC-
Subject:	[EXTERNAL] Comments - EIA-112
Date:	Monday, July 22, 2024 1:09:50 PM
Attachments:	EIA 112 - MOPC Comments.pdf

Good afternoon,

Attached, please find comments from the Maryland Office of People's Counsel, filed in support of form EIA-112.

--
Peggy Costello, Esq.
Assistant People's Counsel
Maryland Office of People's Counsel
6 St. Paul Street, Suite 2102
Baltimore, MD 21202
Work: 410.767.8185
Pronouns: she/her

From: EIA112
To: Peggy Costello -OPC-
Subject: RE: [EXTERNAL] Comments - EIA-112
Date: Tuesday, September 10, 2024 10:20:00 AM

Peggy,

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.
During pretesting, we did not ask questions about customer debt or arrearages. If approved, this survey will be valid for the usual three-year period, at which time we will resubmit the survey to the Office of Management and Budget (OMB) for another approval. For future cycles of this survey, we can consider adding more questions, to the extent that:

- Pretesting supports them
- They are of interest to the public
- They are within scope and achievable given resource constraints and respondent burden

Assuming OMB approves the survey, we will start collecting the disconnection data for 2024 in early 2025.

Marc Harnish

From: Peggy Costello -OPC- <peggy.costello@maryland.gov>
Sent: Monday, July 22, 2024 1:06 PM
To: EIA112 <EIA112@eia.gov>
Cc: David Lapp -OPC- <davids.lapp@maryland.gov>; Juliana Bell -OPC- <juliana.bell2@maryland.gov>; Brandi Nieland -OPC- <brandi.nieland@maryland.gov>
Subject: [EXTERNAL] Comments - EIA-112

Good afternoon,

Attached, please find comments from the Maryland Office of People's Counsel, filed in support of form EIA-112.

--

Peggy Costello, Esq.
Assistant People's Counsel
Maryland Office of People's Counsel
6 St. Paul Street, Suite 2102
Baltimore, MD 21202
Work: 410.767.8185
Pronouns: she/her

From:	Mary Grant
To:	EIA112
Cc:	Selah Goodson Bell; Heather Franklin
Subject:	[EXTERNAL] Group comments on Proposed Form EIA-112
Date:	Friday, August 16, 2024 11:09:13 AM
Attachments:	EIA Mass Sign-On Letter.pdf

Good morning,

Please find the attached comments from 78 energy justice, environmental, consumer protection, and social justice organizations in response to the request for comments on the Proposed Collection of Information in
the Residential Utility Disconnections Survey (Form EIA-112).

Thank you for your time and consideration,
Mary Grant

--
Mary Grant (she/her)
Public Water for All Campaign Director
Food & Water Watch

From:	EIA112
To:	"Mary Grant"
Subject:	RE: Group comments on Proposed Form EIA-112
Date:	Tuesday, September 10, 2024 10:26:00 AM

Mary,

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.
During pretesting, we did not ask questions about customer debt or arrearages. If approved, this survey will be valid for the usual three-year period, at which time we will resubmit the survey to the Office of Management and Budget (OMB) for another approval. For future cycles of this survey, we can consider adding more questions, to the extent that:

- Pretesting supports them
- They are of interest to the public
- They are within scope and achievable given resource constraints and respondent burden

Assuming OMB approves the survey, we will start collecting the disconnection data for 2024 in early 2025.

Marc Harnish

From: Mary Grant <mgrant@fwwatch.org>
Sent: Friday, August 16, 2024 11:04 AM
To: EIA112 <EIA112@eia.gov>
Cc: Selah Goodson Bell <sgoodsonbell@biologicaldiversity.org>; Heather Franklin <hfranklin@freepress.net>
Subject: [EXTERNAL] Group comments on Proposed Form EIA-112

Good morning,

Please find the attached comments from 78 energy justice, environmental, consumer protection, and social justice organizations in response to the request for comments on the Proposed Collection of Information in
the Residential Utility Disconnections Survey (Form EIA-112).

Thank you for your time and consideration,
Mary Grant

--
Mary Grant (she/her)
Public Water for All Campaign Director
Food & Water Watch

From:	Katie Kienbaum
To:	EIA112
Subject:	[EXTERNAL] Comments on Proposed Form EIA-112
Date:	Thursday, August 15, 2024 6:23:18 PM
Attachments:	Form-EIA-112-ILSR-Comments-8-15-2024.pdf

Good afternoon,

I'd like to submit comments from the Institute for Local Self-Reliance in response to the request for comments on EIA's new Residential Utility Disconnections Survey published in the Federal Register on July 20.

I've attached a PDF with our comments, and I've also copied them below.

Please let me know if this should be in a different format or if you need any additional information.

Thank you,

--

Katie Kienbaum
Senior Researcher, Energy Democracy Initiative
Institute for Local Self-Reliance | ILSR.org
Member, OPEIU Local 12, AFL-CIO
(she/her)

--

August 15, 2024

Submitted via email to EIA112@eia.gov

Marc Harnish
U.S. Energy Information Administration (EIA)
U.S. Department of Energy
1000 Independence Ave, SW
Washington, DC 20585

RE: Federal Register Request for Comments on EIA Information Collection Proposed New Survey, *Residential Utility Disconnection Survey*, **Form EIA-112 (July 20, 2024)**

Thank you for the opportunity to comment on EIA's groundbreaking proposed new survey on residential utility disconnections. This data will help policymakers better understand the prevalence of disconnections and address related threats to health and wellbeing. It can be improved further by increasing the scope and granularity of the survey.

The Institute for Local Self-Reliance is a 50-year-old, national nonprofit research and educational organization. ILSR has a vision of thriving, diverse, equitable communities. To reach this vision, we build local power to fight corporate control. This includes advocating for equitable access to affordable, reliable, clean energy and for solutions that harness the power of citizens and communities, as part of our Energy Democracy initiative.

As proposed, Form EIA-112 would provide essential information for state and federal policymakers, collecting for the first time comprehensive national data on utility disconnections due to bill nonpayment. Access to energy is a human right, and undisrupted utility connections are necessary for household health and safety.[1]

National disconnection data can offer regulators, lawmakers, and elected officials — as well as advocates and other stakeholders — vital insight into the current scale of utility disconnections and the threats they pose to community health. And, it would help these decision-makers create policies that advance the public interest in minimizing disconnections, such as moratoria on utility disconnections.

EIA's new national data set will allow state regulators to overcome substantial barriers to effective regulation of monopoly utility companies. Energy utilities have monopolies over distribution of electricity and gas and do not face competitive pressures to behave well. Investor-owned utilities in particular prioritize shareholder profits over public wellbeing, which leads to greater disconnections due to nonpayment.[2] To wit, researchers found that just 1% of the amount that certain utilities paid out in shareholder dividends from 2020 to 2022 could have prevented all of the disconnections those utilities made over the same timeframe.[3] State regulators can exercise more effective oversight of energy utilities if they have quality data on disconnections that would allow them to compare utility performance and identify best practices.

To increase the effectiveness of the proposed survey, we recommend making two key improvements to Form EIA-112:

1. Require utilities to report more granular geographic disconnection data.
   While the statewide data requested currently by Form EIA-112 would provide useful information, more granular information — at the county, zip code, or census tract level — would reveal which communities face the greatest threat of disconnection due to nonpayment and enable effective policy responses. On average, low-income, Black, Hispanic, and Native American households spend the highest proportions of their incomes on energy.[4] Research also shows that utilities disconnect these households more frequently.[5] Granular reporting would help policymakers and stakeholders identify the households most at risk of disconnection and the policies that could prevent harmful service disruptions. This would be worth the additional reporting burden on responding utilities — indeed, some states already require reporting of disconnection data by zip code, such as Illinois and California.[6]

2. Require utilities to report additional data on customer utility debt.
   Capturing data on customer arrearages would provide policymakers a more complete picture of household energy insecurity. One estimate finds that about one in every six households has past-due energy bills.[7] Unaffordable energy costs and overdue bills lock households into cycles of disconnection and debt, expose customers to harmful debt collection practices, and make it harder for energy assistance programs to serve their clients.[8] Collecting data on utility debt in addition to disconnections due to nonpayment would help policymakers identify and address the causes of harmful disconnections.

We appreciate your consideration, and we look forward to implementation of the final survey.

Sincerely,

Katie Kienbaum
Senior Researcher, Energy Democracy Initiative
Institute for Local Self-Reliance
kkienbaum@ilsr.org

References

1. Diana Hernández, "Energy Insecurity And Health: America's Hidden Hardship," Health Affairs, June 29, 2023, https://www.healthaffairs.org/do/10.1377/hpb20230518.472953/; Anita Snow, "Heat deaths of

people without air conditioning, often in mobile homes, underscore energy inequity," Associated Press, August 2, 2024, https://apnews.com/article/extreme-heat-deaths-air-conditioning-095cc1820abab04ed9729c6de73f21ce.

2.

John Farrell, Upcharge: Hidden Costs of Electric Utility Monopoly Power, Institute for Local Self-Reliance, May 30, 2024, https://ilsr.org/articles/report-upcharge-electric-utility-monopoly/.

3.

Selah Goodson Bell, et al., Powerless in the U.S., Center for Biological Diversity, Energy and Policy Institute, and BailoutWatch, January 30, 2023, https://www.biologicaldiversity.org/programs/energy-justice/pdfs/Powerless-in-the-US_Report.pdf.

4.

Ariel Drehobl, Lauren Ross, and Roxana Ayala, How High Are Household Energy Burdens?, American Council for an Energy-Efficient Economy, September 10, 2020, https://www.aceee.org/research-report/u2006.

5.

Hernández, "Energy Insecurity"; Bhavin Pradhan and Gabriel Chan, "Racial and Economic Disparities in Electric Reliability and Service Quality in Xcel Energy's Minnesota Service Area," Center for Science, Technology, and Environmental Policy, Humphrey School of Public Affairs, University of Minnesota, February 2024, https://conservancy.umn.edu/items/8121c1ee-b191-4add-ac72-086af690e344; Michelle Graff, et al., "Which households are energy insecure? An empirical analysis of race, housing conditions, and energy burdens in the United States," Energy Research & Social Science, Volume 79, September 2021, https://doi.org/10.1016/j.erss.2021.102144.

6.

Sanya Carley and David Konisky, "Utility Disconnections Dashboard," Energy Justice Lab, 2023, https://http-149-165-173-211-80.proxy-js2-iu.exosphere.app/.

7.

"Summer Residential Cooling Outlook," National Energy Assistance Directors Association and Center for Energy Poverty and Climate, June 3, 2024, https://neada.org/wp-content/uploads/2024/06/2024summeroutlook.pdf.

8.

David Konisky, et al., "The persistence of household energy insecurity during the COVID-19 pandemic," Environmental Research, Volume 17, Number 10, September 23, 2022, https://iopscience.iop.org/article/10.1088/1748-9326/ac90d7; Joseph Daniel, "We Need to Put an End to Selling Utility Customer Debt," The Equation, Union of Concerned Scientists, February 4, 2021, https://blog.ucsusa.org/joseph-daniel/we-need-to-end-to-selling-utility-customer-debt/.

****

From: EIA112
To: Katie Kienbaum
Subject: RE: [EXTERNAL] Comments on Proposed Form EIA-112
Date: Tuesday, September 10, 2024 10:26:00 AM

Katie,

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.
During pretesting, we did not ask questions about customer debt or arrearages. If approved, this survey will be valid for the usual three-year period, at which time we will resubmit the survey to the Office of Management and Budget (OMB) for another approval. For future cycles of this survey, we can consider adding more questions, to the extent that:

- Pretesting supports them
- They are of interest to the public
- They are within scope and achievable given resource constraints and respondent burden

Assuming OMB approves the survey, we will start collecting the disconnection data for 2024 in early 2025.

Marc Harnish

From: Katie Kienbaum <kkienbaum@ilsr.org>
Sent: Thursday, August 15, 2024 6:16 PM
To: EIA112 <EIA112@eia.gov>
Subject: [EXTERNAL] Comments on Proposed Form EIA-112

Good afternoon,

I'd like to submit comments from the Institute for Local Self-Reliance in response to the request for comments on EIA's new Residential Utility Disconnections Survey published in the Federal Register on July 20.

I've attached a PDF with our comments, and I've also copied them below.

Please let me know if this should be in a different format or if you need any additional information.

Thank you,

--

Katie Kienbaum
Senior Researcher, Energy Democracy Initiative
Institute for Local Self-Reliance | ILSR.org
Member, OPEIU Local 12, AFL-CIO
(she/her)

--

August 15, 2024

Submitted via email to EIA112@eia.gov

Marc Harnish
U.S. Energy Information Administration (EIA)
U.S. Department of Energy
1000 Independence Ave, SW
Washington, DC 20585

RE: Federal Register Request for Comments on EIA Information Collection Proposed New Survey, *Residential Utility Disconnection Survey*, **Form EIA-112 (July 20, 2024)**

Thank you for the opportunity to comment on EIA's groundbreaking proposed new survey on residential utility disconnections. This data will help policymakers better understand the prevalence of disconnections and address related threats to health and wellbeing. It can be improved further by increasing the scope and granularity of the survey.

The Institute for Local Self-Reliance is a 50-year-old, national nonprofit research and educational organization. ILSR has a vision of thriving, diverse, equitable communities. To reach this vision, we build local power to fight corporate control. This includes advocating for equitable access to affordable, reliable, clean energy and for solutions that harness the power of citizens and communities, as part of our Energy Democracy initiative.

As proposed, Form EIA-112 would provide essential information for state and federal policymakers, collecting for the first time comprehensive national data on utility disconnections due to bill nonpayment. Access to energy is a human right, and undisrupted utility connections are necessary for household health and safety.[1]

National disconnection data can offer regulators, lawmakers, and elected officials — as well as advocates and other stakeholders — vital insight into the current scale of utility disconnections and the threats they pose to community health. And, it would help these decision-makers create policies that advance the public interest in minimizing disconnections, such as moratoria on utility disconnections.

EIA's new national data set will allow state regulators to overcome substantial barriers to effective regulation of monopoly utility companies. Energy utilities have monopolies over distribution of electricity and gas and do not face competitive pressures to behave well. Investor-owned utilities in particular prioritize shareholder profits over public wellbeing, which leads to greater disconnections due to nonpayment.[2] To wit, researchers found that just 1% of the amount that certain utilities paid out in shareholder dividends from 2020 to 2022 could have prevented all of the disconnections those utilities made over the same timeframe.[3] State regulators can exercise more effective oversight of energy utilities if they have quality data on disconnections that would allow them to compare utility performance and identify best practices.

To increase the effectiveness of the proposed survey, we recommend making two key improvements to Form EIA-112:

1. Require utilities to report more granular geographic disconnection data.

   While the statewide data requested currently by Form EIA-112 would provide useful information, more granular information — at the county, zip code, or census tract level — would reveal which communities face the greatest threat of disconnection due to nonpayment and enable effective policy responses. On average, low-income, Black, Hispanic, and Native American households spend the highest proportions of their incomes on energy.[4] Research also shows that utilities disconnect these households more frequently.[5] Granular reporting would help policymakers and stakeholders identify the households most at risk of disconnection and the policies that could prevent harmful service disruptions. This would be worth the additional reporting burden on responding utilities — indeed, some states already require reporting of disconnection data by zip code, such as Illinois and California.[6]

2. Require utilities to report additional data on customer utility debt.

   Capturing data on customer arrearages would provide policymakers a more complete picture of household energy insecurity. One estimate finds that about one in every six households has past-due energy bills.[7] Unaffordable energy costs and overdue bills lock households into cycles of disconnection and debt, expose customers to harmful debt collection practices, and make it harder for energy assistance programs to serve their clients.[8] Collecting data on utility debt in addition to disconnections due to nonpayment would help policymakers identify and address the causes of harmful disconnections.

We appreciate your consideration, and we look forward to implementation of the final survey.

Sincerely,

Katie Kienbaum
Senior Researcher, Energy Democracy Initiative
Institute for Local Self-Reliance
kkienbaum@ilsr.org

References

1. Diana Hernández, "Energy Insecurity And Health: America's Hidden Hardship," Health Affairs, June 29, 2023, https://www.healthaffairs.org/do/10.1377/hpb20230518.472953/; Anita Snow, "Heat deaths of people without air conditioning, often in mobile homes, underscore energy inequity," Associated Press, August 2, 2024, https://apnews.com/article/extreme-heat-deaths-air-conditioning-095cc1820abab04ed9729c6de73f21ce.
2. John Farrell, Upcharge: Hidden Costs of Electric Utility Monopoly Power, Institute for Local Self-Reliance, May 30, 2024, https://ilsr.org/articles/report-upcharge-electric-utility-monopoly/.
3. Selah Goodson Bell, et al., Powerless in the U.S., Center for Biological Diversity, Energy and Policy Institute, and BailoutWatch, January 30, 2023, https://www.biologicaldiversity.org/programs/energy-justice/pdfs/Powerless-in-the-US_Report.pdf.
4. Ariel Drehobl, Lauren Ross, and Roxana Ayala, How High Are Household Energy Burdens?, American Council for an Energy-Efficient Economy, September 10, 2020, https://www.aceee.org/research-report/u2006.
5. Hernández, "Energy Insecurity"; Bhavin Pradhan and Gabriel Chan, "Racial and Economic Disparities in Electric Reliability and Service Quality in Xcel Energy's Minnesota Service Area," Center for Science, Technology, and Environmental Policy, Humphrey School of Public Affairs, University of Minnesota, February 2024, https://conservancy.umn.edu/items/8121c1ee-b191-4add-ac72-086af690e344; Michelle Graff, et al., "Which households are energy insecure? An empirical analysis of race, housing conditions, and energy burdens in the United States," Energy Research & Social Science, Volume 79, September 2021, https://doi.org/10.1016/j.erss.2021.102144.
6. Sanya Carley and David Konisky, "Utility Disconnections Dashboard," Energy Justice Lab, 2023, https://http-149-165-173-211-80.proxy-js2-iu.exosphere.app/.
7. "Summer Residential Cooling Outlook," National Energy Assistance Directors Association and Center for Energy Poverty and Climate, June 3, 2024, https://neada.org/wp-content/uploads/2024/06/2024summeroutlook.pdf.
8. David Konisky, et al., "The persistence of household energy insecurity during the COVID-19 pandemic," Environmental Research, Volume 17, Number 10, September 23, 2022, https://iopscience.iop.org/article/10.1088/1748-9326/ac90d7; Joseph Daniel, "We Need to Put an End to Selling Utility Customer Debt," The Equation, Union of Concerned Scientists, February 4, 2021, https://blog.ucsusa.org/joseph-daniel/we-need-to-end-to-selling-utility-customer-debt/.

****

This message does not originate from a known Department of Energy email system.
Use caution if this message contains attachments, links or requests for information.

****

From:	Cassandra Lovejoy
To:	EIA112
Cc:	Mark Wolfe
Subject:	[EXTERNAL] Comments on EIA Proposed New Survey: Residential Utility Disconnections Survey
Date:	Monday, August 19, 2024 3:28:44 PM
Attachments:	NEADA EIA Comments 8-19-24.pdf

Dear Mr. Harnish,

Attached please find comments from the National Energy Assistance Directors Association (NEADA) in response to the proposed new survey, Residential Utility Disconnections Survey, Form EIA-112. We support the creation of this survey to make national data about disconnections publicly available.

Please contact us if you have any questions or would like to speak further on this topic.

Sincerely,

National Energy Assistance Directors Association
202-333-5915

Mark Wolfe – Executive Director
Cassandra Lovejoy – Policy Director

From:	EIA112
To:	"Cassandra Lovejoy"
Subject:	RE: Comments on EIA Proposed New Survey: Residential Utility Disconnections Survey
Date:	Tuesday, September 10, 2024 10:27:00 AM

Cassandra,

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.
During pretesting, we did not ask questions about customer debt or arrearages. If approved, this survey will be valid for the usual three-year period, at which time we will resubmit the survey to the Office of Management and Budget (OMB) for another approval. For future cycles of this survey, we can consider adding more questions, to the extent that:

- Pretesting supports them
- They are of interest to the public
- They are within scope and achievable given resource constraints and respondent burden

Assuming OMB approves the survey, we will start collecting the disconnection data for 2024 in early 2025.

Marc Harnish

From: Cassandra Lovejoy <clovejoy@neada.org>
Sent: Monday, August 19, 2024 3:24 PM
To: EIA112 <EIA112@eia.gov>
Cc: Mark Wolfe <mwolfe@neada.org>
Subject: [EXTERNAL] Comments on EIA Proposed New Survey: Residential Utility Disconnections Survey

Dear Mr. Harnish,

Attached please find comments from the National Energy Assistance Directors Association (NEADA) in response to the proposed new survey, Residential Utility Disconnections Survey, Form EIA-112.
We support the creation of this survey to make national data about disconnections publicly available.

Please contact us if you have any questions or would like to speak further on this topic.

Sincerely,

National Energy Assistance Directors Association
202-333-5915

Mark Wolfe – Executive Director
Cassandra Lovejoy – Policy Director

From:	EIA112
To:	Anne McKeithen
Subject:	RE: [EXTERNAL] Supporting basic needs for all - Residential Utility Disconnections Survey Comments
Date:	Tuesday, September 10, 2024 10:21:00 AM

Anne,

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.
During pretesting, we did not ask questions about customer debt or arrearages. If approved, this survey will be valid for the usual three-year period, at which time we will resubmit the survey to the Office of Management and Budget (OMB) for another approval. For future cycles of this survey, we can consider adding more questions, to the extent that:

- Pretesting supports them
- They are of interest to the public
- They are within scope and achievable given resource constraints and respondent burden

Assuming OMB approves the survey, we will start collecting the disconnection data for 2024 in early 2025.

Marc Harnish

From: Anne McKeithen <anne.mckeithen@gmail.com>
Sent: Thursday, July 25, 2024 2:55 PM
To: EIA112 <EIA112@eia.gov>
Subject: [EXTERNAL] Supporting basic needs for all - Residential Utility Disconnections Survey Comments

Dear Marc Harnish,

As a resident of Virginia, I would like to comment in support of this survey initiative because it will provide much-needed data transparency about the scale and nature of utility shutoffs that impact residents all over Virginia. Nationally, there has been inconsistency in regulation and reporting of utility shutoffs due to non-payment. My hope is that this survey will help to

standardize the data that is provided. There are, however, other items that must be addressed in order to ensure energy justice for all.

One issue I hope that the survey will shed light on is the inequities embedded in a racist energy system. Systemic racism in public energy is tied to the legacy of redlining and other discriminatory practices. Because of this, I am asking that the survey ask respondents to aggregate their data by zip code, county, or other comparable geographic metrics to shed light on the persistent race and class disparities of utility shutoffs.

Additionally, I ask that the utility debt data will be used to help to make energy more affordable for all Virginians. The pandemic called increased attention to the issue of energy affordability, during which many families were tragically required to decide between feeding their families and paying energy bills. 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. Thus, the survey should also include more data on customer debt to clarify the harmful impact of predatory credit and collection policies at the state and utility levels.

For the sake of my community, I am asking that these crucial items be addressed in the Residential Utility Disconnections Survey.

Thank you for your consideration.

Sincerely,
Anne McKeithen
233 E Jefferson St
Charlottesville, VA 22902

From: EIA112
To: William Schomp
Subject: RE: [EXTERNAL] Utility Shut-offs
Date: Tuesday, September 10, 2024 10:24:00 AM

William,

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.
During pretesting, we did not ask questions about customer debt or arrearages. If approved, this survey will be valid for the usual three-year period, at which time we will resubmit the survey to the Office of Management and Budget (OMB) for another approval. For future cycles of this survey, we can consider adding more questions, to the extent that:

- Pretesting supports them
- They are of interest to the public
- They are within scope and achievable given resource constraints and respondent burden

Assuming OMB approves the survey, we will start collecting the disconnection data for 2024 in early 2025.

Marc Harnish

From: William Schomp <william.schomp@gmail.com>
Sent: Monday, August 12, 2024 9:25 AM
To: EIA112 <EIA112@eia.gov>
Subject: [EXTERNAL] Utility Shut-offs

As We the People head into the future, it seems undoubtedly clear that uninterrupted access to utilities, including electricity, will become more and more difficult for us. The following comments were provided to me by an advocacy group that I trust. I ask that you consider these comments carefully. Sincerely and best wishes, William G. Schomp

Talking Points for Comment Letters and Other Advocacy Efforts

1. *Data Transparency Can Help Enshrine Access to Utilities as a Human Right*

Access to utilities like electricity is a human right. Yet these life-saving services remain unaffordable and inaccessible for countless families across the country. This was especially pertinent during the COVID-19 pandemic, when an economic downturn combined with a lockdown meant families had to make sacrifices over putting food on the table or paying a utility bill. **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.**

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).

Although shutoff data exists, **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 **44% (22) of states fail to require utilities to disclose their residential electric and gas shutoffs for non-payment.** Even among the 29 states that do require disclosures, as of 2023, only 13 mandated clear, standardized, and monthly data.

2. *Granular Shutoff Data Can Expose the Inequities Baked Into a Systemically Racist Energy System*

Despite profiting millions of dollars every year and generously rewarding executives and shareholders, monopoly utility companies are jacking up utility costs, blocking rooftop and community solar deployment, and shutting off millions of families from life-saving utilities. 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, 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. A 2020 study by the American Council for an Energy-Efficient Economy found that "on average, Black households' energy burden is 43 percent higher than white households, while Hispanic households' energy burden is 20 percent higher than white households." Similarly, the National Energy Assistance Directors Association's (NEADA) latest Energy Hardship report found that 23.5% of households could not afford to pay their energy bill for at least one month in the past year. Alarmingly, that percentage was significantly higher for households of color (33%) and low-income households (38.3%).

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.

3. *Utility Debt Data Empowers Us to Make Energy Affordable for All*

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 (i.e. arrearages). 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. 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.

William G. Schomp
610-470-3204
534 University Ave.
Elyria, OH 44035-7237

From: EIA112
To: Eve Schwartz
Subject: RE: [EXTERNAL] Supporting basic needs for all - Residential Utility Disconnections Survey Comments
Date: Tuesday, September 10, 2024 10:24:00 AM

Eve,

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.
During pretesting, we did not ask questions about customer debt or arrearages. If approved, this survey will be valid for the usual three-year period, at which time we will resubmit the survey to the Office of Management and Budget (OMB) for another approval. For future cycles of this survey, we can consider adding more questions, to the extent that:

- Pretesting supports them
- They are of interest to the public
- They are within scope and achievable given resource constraints and respondent burden

Assuming OMB approves the survey, we will start collecting the disconnection data for 2024 in early 2025.

Marc Harnish

From: Eve Schwartz <eve.schwartz@gmail.com>
Sent: Friday, July 26, 2024 3:39 PM
To: EIA112 <EIA112@eia.gov>
Subject: [EXTERNAL] Supporting basic needs for all - Residential Utility Disconnections Survey Comments

Dear Marc Harnish,

I am in support of this survey initiative. It will provide much-needed data transparency about the scale and nature of utility shutoffs that impact residents all over Virginia. Nationally, there has been inconsistency in regulation and reporting of utility shutoffs due to non-payment. This survey will help to standardize the data that is provided. There are, however, other items that must be addressed in order to ensure energy justice for all.

The survey should aggregate data by zip code, county, or other comparable geographic metrics to shed light on the persistent race and class disparities of utility shutoffs. There inequities embedded in a our energy system, tied to the legacy of redlining and other discriminatory practices.

Utility debt data should be used to help to make energy more affordable for all Virginians. The covid pandemic increased attention to the issue of energy affordability, during which many families were required to decide between feeding their families and paying energy bills. Even post-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. Thus, the survey should also include more data on customer debt to clarify the harmful impact of predatory credit and collection policies at the state and utility levels.

For the sake of my community, I am asking that these crucial items be addressed in the Residential Utility Disconnections Survey.

Thank you for your consideration.

Sincerely,
Eve Schwartz
3308 Merrick Court
Keswick, VA 22947

From:	EIA112
To:	Amy Witcover-Sandford
Subject:	RE: [EXTERNAL] Supporting basic needs for all - Residential Utility Disconnections Survey Comments
Date:	Tuesday, September 10, 2024 10:20:00 AM

Amy,

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.
During pretesting, we did not ask questions about customer debt or arrearages. If approved, this survey will be valid for the usual three-year period, at which time we will resubmit the survey to the Office of Management and Budget (OMB) for another approval. For future cycles of this survey, we can consider adding more questions, to the extent that:

- Pretesting supports them
- They are of interest to the public
- They are within scope and achievable given resource constraints and respondent burden

Assuming OMB approves the survey, we will start collecting the disconnection data for 2024 in early 2025.

Marc Harnish

From: Amy Witcover-Sandford <amsandy.aws@gmail.com>
Sent: Thursday, July 25, 2024 2:38 PM
To: EIA112 <EIA112@eia.gov>
Subject: [EXTERNAL] Supporting basic needs for all - Residential Utility Disconnections Survey Comments

Dear Marc Harnish,

As a resident of Virginia, I would like to comment in support of this survey initiative because it will provide much-needed data transparency about the scale and nature of utility shutoffs that impact residents all over Virginia. Nationally, there has been inconsistency in regulation and reporting of utility shutoffs due to non-payment. My hope is that this survey will help to

standardize the data that is provided. There are, however, other items that must be addressed in order to ensure energy justice for all.

One issue I hope that the survey will shed light on is the inequities embedded in a racist energy system. Systemic racism in public energy is tied to the legacy of redlining and other discriminatory practices. Because of this, I am asking that the survey ask respondents to aggregate their data by zip code, county, or other comparable geographic metrics to shed light on the persistent race and class disparities of utility shutoffs.

Additionally, I ask that the utility debt data will be used to help to make energy more affordable for all Virginians. The pandemic called increased attention to the issue of energy affordability, during which many families were tragically required to decide between feeding their families and paying energy bills. 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. Thus, the survey should also include more data on customer debt to clarify the harmful impact of predatory credit and collection policies at the state and utility levels.

For the sake of my community, I am asking that these crucial items be addressed in the Residential Utility Disconnections Survey.

Thank you for your consideration.

Sincerely,
Amy Witcover-Sandford
210 TERRYS RUN
YORKTOWN, VA 23693

From:	EIA112
To:	Chris Woolery
Subject:	RE: [EXTERNAL] Comment on the Residential Utility Disconnections Survey
Date:	Tuesday, September 10, 2024 10:19:00 AM

Chris,

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.
During pretesting, we did not ask questions about customer debt or arrearages. If approved, this survey will be valid for the usual three-year period, at which time we will resubmit the survey to the Office of Management and Budget (OMB) for another approval. For future cycles of this survey, we can consider adding more questions, to the extent that:

- Pretesting supports them
- They are of interest to the public
- They are within scope and achievable given resource constraints and respondent burden

Assuming OMB approves the survey, we will start collecting the disconnection data for 2024 in early 2025.

Marc Harnish

From: Chris Woolery <pcwoolery@gmail.com>
Sent: Friday, June 28, 2024 11:17 AM
To: EIA112 <EIA112@eia.gov>
Subject: [EXTERNAL] Comment on the Residential Utility Disconnections Survey

Thanks so much for proposing the Residential Utility Disconnections Survey! I work in energy policy in Kentucky and this information is so needed and important.

We've been working on utility disconnection protection legislation for a couple of years now, and legislators need data to make informed decisions. We know that Kentucky households were disconnected more than 61,000 times in 2022 alone, but we need as much granular and updated data as we can find if we want to understand the equity impacts and design targeted interventions.

That's why it's imperative that the EIA require utilities to:
1. provide aggregated 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 and
2. provide data on customer debt to clarify the harmful impact of credit and collection policies at the state and utility levels.

Thanks for your consideration!
CW
--
Chris Woolery
859 621 4765