

From: [Brandon Crawford](#)
To: [EIA112](#)
Subject: [EXTERNAL] Re: Notice and Request for Comments on the Proposed Collection of Information in the Residential Utility Disconnections Survey (Form EIA-112)
Date: Thursday, August 15, 2024 5:59:47 PM
Attachments: [CUB MN - EIA 112 - Information Collection Request - Residential Utility Disconnections.pdf](#)

Dear Mr. Harnish,

The Citizens Utility Board of Minnesota respectfully submits the attached comments in response to the Notice and Request for Comments issued by the Energy Information Administration in the Federal Register on June 20, 2024.

Thank you for your consideration.

Sincerely,

Brandon Crawford | Regulatory Advocate

Citizens Utility Board of Minnesota

332 Minnesota St., Suite W1360, St. Paul, MN 55101

563-663-3519 (cell) | 651-300-4701, ext. 7 (main)

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From: [EIA112](#)
To: [Brandon Crawford](#)
Subject: RE: [EXTERNAL] Re: Notice and Request for Comments on the Proposed Collection of Information in the Residential Utility Disconnections Survey (Form EIA-112)
Date: Tuesday, September 10, 2024 10:34:00 AM

Brandon,

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 the pretesting, we did not ask questions about reconnection rates or the average length of time for reconnection. 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: Brandon Crawford <brandonc@cubminnesota.org>
Sent: Thursday, August 15, 2024 5:55 PM
To: EIA112 <EIA112@eia.gov>
Subject: [EXTERNAL] Re: Notice and Request for Comments on the Proposed Collection of Information in the Residential Utility Disconnections Survey (Form EIA-112)

Dear Mr. Harnish,

The Citizens Utility Board of Minnesota respectfully submits the attached comments in response to the Notice and Request for Comments issued by the Energy Information Administration in the Federal Register on June 20, 2024.

Thank you for your consideration.

Sincerely,

Brandon Crawford | Regulatory Advocate

Citizens Utility Board of Minnesota

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From: [Claire Williamson](#)
To: [EIA112](#)
Cc: [Shray Shetty](#); [Carlene McNulty](#)
Subject: [EXTERNAL] EIA 112- Residential Utility Disconnections Survey Public Comment
Date: Monday, August 19, 2024 2:54:41 PM
Attachments: [NC Justice Center Residential Utility Disconnections Survey Comments \(EIA-112\).pdf](#)

Hi,

Please find the attached comment letter in support of the proposed EIA Residential Utility Disconnections Survey.

Thank you,

Claire Williamson

Senior Energy Policy Advocate
North Carolina Justice Center
224 S. Dawson St.
Raleigh, NC 27601
(919) 856-2185 (office)
(919) 619-0315 (cell)
claire@ncjustice.org
she/her/hers

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From: [EIA112](#)
To: [Claire Williamson](#)
Subject: RE: EIA 112- Residential Utility Disconnections Survey Public Comment
Date: Tuesday, September 10, 2024 10:35:00 AM

Claire,

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.

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- 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: Claire Williamson <Claire@ncjustice.org>
Sent: Monday, August 19, 2024 2:54 PM
To: EIA112 <EIA112@eia.gov>
Cc: Shray Shetty <shray@ncjustice.org>; Carlene McNulty <carlene@ncjustice.org>
Subject: [EXTERNAL] EIA 112- Residential Utility Disconnections Survey Public Comment

Hi,

Please find the attached comment letter in support of the proposed EIA Residential Utility Disconnections Survey.

Thank you,

Claire Williamson

Senior Energy Policy Advocate

North Carolina Justice Center
224 S. Dawson St.
Raleigh, NC 27601
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