

**From:** [Selah Goodson Bell](#)  
**To:** [EIA112](#)  
**Subject:** [EXTERNAL] Joint comments on Form EIA-112  
**Date:** Monday, August 19, 2024 8:50:14 AM  
**Attachments:** [Center for Biological Diversity's Joint Comments for Form EIA-112.pdf](#)

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Good morning,

Please find attached the Center for Biological Diversity's joint comments for Form EIA-112. It includes signatures from 9 other organizations and two experts in the utility justice field. If you have any questions, please direct them to Selah Goodson Bell at [sgoodsonbell@biologicaldiversity.org](mailto:sgoodsonbell@biologicaldiversity.org).

Thank you!

All the Best,  
Selah Goodson Bell (he/him)  
Energy Justice Campaigner  
Energy Justice Program  
Center for Biological Diversity  
[sgoodsonbell@biologicaldiversity.org](mailto:sgoodsonbell@biologicaldiversity.org)  
Twitter: @selah\_bell

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**From:** [EIA112](#)  
**To:** [Selah Goodson Bell](#)  
**Subject:** RE: Joint comments on Form EIA-112  
**Date:** Tuesday, September 10, 2024 10:42:00 AM

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Selah,

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.

Due to the limitations placed on us by the Congress for this survey, we did not include many areas of interest in our pretesting. In the future, we will have opportunities to ask more detailed questions about topics such as:

- Duration of disconnections
- Customer type
- Arrearage data
- Payment plans
- Energy assistance programs
- Debt collection
- Additional fees

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. 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

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**From:** Selah Goodson Bell <[sgoodsonbell@biologicaldiversity.org](mailto:sgoodsonbell@biologicaldiversity.org)>  
**Sent:** Monday, August 19, 2024 8:42 AM  
**To:** EIA112 <[EIA112@eia.gov](mailto:EIA112@eia.gov)>

**Subject:** [EXTERNAL] Joint comments on Form EIA-112

Good morning,

Please find attached the Center for Biological Diversity's joint comments for Form EIA-112. It includes signatures from 9 other organizations and two experts in the utility justice field. If you have any questions, please direct them to Selah Goodson Bell at [sgoodsonbell@biologicaldiversity.org](mailto:sgoodsonbell@biologicaldiversity.org).

Thank you!

All the Best,  
Selah Goodson Bell (he/him)

Energy Justice Campaigner

Energy Justice Program

Center for Biological Diversity

[sgoodsonbell@biologicaldiversity.org](mailto:sgoodsonbell@biologicaldiversity.org)

Twitter: @selah\_bell

\*\*\*\*\*

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**From:** [EIA112](#)  
**To:** [Thor Hinckley](#)  
**Subject:** RE: [EXTERNAL] Request to Collect Information on Utility Customer Shut-Offs  
**Date:** Tuesday, September 10, 2024 10:42:00 AM

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Thor,

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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Marc Harnish

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**From:** Thor Hinckley <thorhinckley53@gmail.com>  
**Sent:** Tuesday, August 13, 2024 5:56 PM  
**To:** EIA112 <EIA112@eia.gov>  
**Subject:** [EXTERNAL] Request to Collect Information on Utility Customer Shut-Offs

Greetings on Behalf of the Coordinating Committee for Third Act Oregon we are requesting that the Energy Information Agency collect customer shut-off data for all utility customers in the United States and its territories. As discussed below, we believe collection of this information is crucial to the understanding the environmental and social justice impacts from these denials of a critical life-saving service.

### *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.

The data collected 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.

Although some shutoff data exists, persistent data gaps at the national level continue to mask the true magnitude of utility injustices. 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.

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

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.

Third Act Oregon believes that 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.

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.

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

Although utility shutoffs are extremely severe, they are ultimately just one piece of the energy insecurity puzzle. 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.

We believe that the EAI should begin collection of the data needed for a national database on utility shut-offs. This information should 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.

Sincerely,  
Third Act Oregon Coordinating Committee

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**From:** [Nina Suetake](#)  
**To:** [EIA112](#)  
**Cc:** [David Springe](#)  
**Subject:** [EXTERNAL] NASUCA comments on Residential Utility Disconnections Survey  
**Date:** Monday, August 19, 2024 5:58:37 PM  
**Attachments:** [NASUCA EIA Disconnection Comments.docx](#)  
[NASUCA EIA Disconnection Comments.pdf](#)

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Marc Harnish,

Attached please find the comments of the National Association of State Utility Consumer Advocates in response to the Energy Information Administration's Notice and Request for Comments regarding the Residential Utility Disconnections Survey, Form EIA-112. Please feel free to contact me at this email or phone number listed, below, if you have any additional questions or concerns. Thank you.

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Nina Suetake  
Deputy Director of Policy  
National Association of State Utility Consumer Advocates (NASUCA)  
(202) 815-3935 (mobile)  
[nina.suetake@nasuca.org](mailto:nina.suetake@nasuca.org)

**From:** [EIA112](#)  
**To:** [Nina Suetake](#)  
**Subject:** RE: [EXTERNAL] NASUCA comments on Residential Utility Disconnections Survey  
**Date:** Tuesday, September 10, 2024 10:43:00 AM

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Nina,

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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Marc Harnish

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**From:** Nina Suetake <nina.suetake@nasuca.org>  
**Sent:** Monday, August 19, 2024 3:55 PM  
**To:** EIA112 <EIA112@eia.gov>



**Cc:** David Springe <david.springe@nasuca.org>

**Subject:** [EXTERNAL] NASUCA comments on Residential Utility Disconnections Survey

Marc Harnish,

Attached please find the comments of the National Association of State Utility Consumer Advocates in response to the Energy Information Administration's Notice and Request for Comments regarding the Residential Utility Disconnections Survey, Form EIA-112. Please feel free to contact me at this email or phone number listed, below, if you have any additional questions or concerns. Thank you.

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Nina Suetake

Deputy Director of Policy

National Association of State Utility Consumer Advocates (NASUCA)

(202) 815-3935 (mobile)

[nina.suetake@nasuca.org](mailto:nina.suetake@nasuca.org)

**From:** [EIA112](#)  
**To:** [Trierweiler, Walt](#)  
**Subject:** RE: Comments of Florida Office of Public Counsel (FOPC)  
**Date:** Tuesday, September 10, 2024 10:44:00 AM

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Walt,

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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Marc Harnish

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**From:** Trierweiler, Walt <TRIERWEILER.WALT@leg.state.fl.us>  
**Sent:** Monday, August 19, 2024 1:56 PM  
**To:** EIA112 <EIA112@eia.gov>

**Subject:** [EXTERNAL] Comments of Florida Office of Public Counsel (FOPC)

**TO:** [EIA112@eia.gov](mailto:EIA112@eia.gov)

**RE:** U.S. Energy Information Administration: Agency Information Collection Proposed New Survey

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**Comments of Florida Office of Public Counsel (FOPC)**

Pursuant to the U.S. Energy Information Administration (EIA) invitation for public comment on the proposed collection of information in the Residential Utility Disconnections Survey, the FOPC respectfully submits the following comments.

First, the FOPC reaffirms the National Association of State Utility Consumer Advocates' Resolution 2019-07, regarding best practices in data collection and reporting for utility services, as well as delinquencies in payments and disconnections of service. This resolution can be found at the following web link: [Microsoft Word - 2019-07 NASUCA Data Collection Resolution - Joint with NARUC.docx](#).

Second, as indicated by the EIA in 2018, one in three U.S. households faces a challenge in meeting energy needs. Please see: <https://www.eia.gov/todayinenergy/detail.php?id=37072#>.

Third, using data from the Bureau of Labor Statistics' Consumer Expenditure Survey, the resulting report presents findings from an analysis of combined energy burdens, which includes expenditures on both home and transportation energy as a share of income. Energy costs are not experienced in isolation: measuring combined energy burdens provides a more comprehensive understanding of a household's true overall energy burden. As families switch to electric vehicles, or take on longer commutes in order to access more affordable housing, evaluating combined energy burdens will be essential to tracking the overall energy affordability for U.S. households. This analysis is the first of its kind to rely on a single survey to estimate combined energy burdens. The above-referenced report can be found at the web link: [https://www.aceee.org/sites/default/files/pdfs/combined\\_energy\\_burdens\\_-\\_estimating\\_total\\_home\\_and\\_transportation\\_energy\\_burdens.pdf](https://www.aceee.org/sites/default/files/pdfs/combined_energy_burdens_-_estimating_total_home_and_transportation_energy_burdens.pdf).

The following are key findings of that report are as follows:

- Combined energy burdens include both home energy and transportation fuel costs as a share of income in order to provide a holistic picture of household energy expenditure.
- In 2022, U.S. households spent on average 5.6% of their income on energy, with transportation fuel making up over half of this spending.
- Low-income households spent on average 17.8% of their income on energy alone, almost four times the national average.
- Roughly one in four households experienced high combined energy burdens (spent more than 12% of their income just on energy) and a staggering three in four low-income households experienced high combined burdens.
- Rural households had an average combined burden nearly 50% higher than urban households.
- Black households spent on average 6% of their income on energy, roughly 10% above the national average.
- Hispanic households spent on average 7.9% of their income on energy, roughly 42% above the national average.
- The increasing adoption of electric vehicles will cause home electric energy burdens to increase while decreasing transportation fuel burdens, making the tracking of combined energy burdens more important.

Fourth, effective **July 1, 2024**, Florida's Energy Policy now includes affordable energy supply as a goal, pursuant to Section 377.601(2)(a), Florida Statutes. Please see the following web

link: [http://www.leg.state.fl.us/statutes/index.cfm?App\\_mode=Display\\_Statute&Search\\_String=&URL=0300-0399/0377/Sections/0377.601.html](http://www.leg.state.fl.us/statutes/index.cfm?App_mode=Display_Statute&Search_String=&URL=0300-0399/0377/Sections/0377.601.html).

Lastly, the FOPC acknowledges that Form EIA-112 would annually collect 12 months of data from electric and natural gas providers about final termination notices sent to residential customers due to bill nonpayment, service disconnections of residential customers due to bill nonpayment, and service reconnections of residential customers who were disconnected due to bill nonpayment and that no national data is currently collected on this information. Given the above, the FOPC supports the proposed annual survey that collects information on the number of monthly natural gas and electric service final notices, disconnections, and reconnections for bill nonpayment across residential customers through Form EIA-112 for which such information could potentially be very useful as our office advocates on behalf of Florida electric and gas customers.

Very respectfully,

Walt

*Walt Trierweiler*

*Public Counsel*

*Office of the Public Counsel*

*111 West Madison Street, Room 812*

*Tallahassee, FL 32399-1400*

*(850) 488-9330*

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