

From: [Adam Cooper](#)
To: [EIA112](#)
Cc: [Sandra Safto](#); [Alex Bond](#); [Allison Poe](#); [Patrice Hunter](#); [Brian Reil](#); [Stephanie Johnson](#); [Caudill, Brian](#); [Meyer, Richard](#); mmurray@aga.org; [Lowe, George](#); [Duckman, Ashley](#); [Lapato, Daniel](#)
Subject: [EXTERNAL] Comments on proposed EIA Form-112 | AGA & EEI
Date: Friday, August 16, 2024 6:53:59 PM
Attachments: [AGA EEI Comments on Proposed Form EIA-112 .pdf](#)

Dear Mr. Harnish,

On behalf of the American Gas Association (AGA) and the Edison Electric Institute (EEI) please find attached a joint comment letter regarding the proposed EIA Form-112. We appreciate the opportunity to comment and we invite you to reach out to us with any questions you may have regarding this letter.

Please confirm receipt.

Sincerely,
Adam

Adam Cooper
Managing Director, Customer Solutions, Edison Electric Institute
Cell: 831-601-3795

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: [EIA112](#)
To: [Adam Cooper](#)
Subject: RE: Comments on proposed EIA Form-112 | AGA & EEI
Date: Tuesday, September 10, 2024 10:54:00 AM

Adam,

We appreciate your comments on Form EIA-112, *Residential Utility Disconnections Survey*, regarding the potential burden to your members that this data collection represents and your thoughtful feedback on ways to avoid duplication with existing collection efforts.

This data collection responds directly to the current data gap in utility disconnections. We plan to provide a comprehensive dataset on the frequency and intensity of utility disconnections at the state level. We also plan to publish the data collected at the utility level, which can inform more detailed estimates than our state-level aggregate estimates.

We initiated this collection effort in response to language included in the Joint Explanatory Statement to the FY 2023 budget appropriations act, specifically, that Congress will provide funding:

“...to conduct a monthly survey of electric and heating service providers of final termination notices sent due to bill nonpayment, service disconnections due to bill nonpayment, and service reconnections of customers disconnected for bill nonpayment, in a form and manner determined by the agency.”

We conducted significant pretesting ahead of posting this survey instrument for public comment, as required under guidelines set forth in the Paperwork Reduction Act and Office of Management and Budget (OMB) Statistical Directive No. 2. To further refine the survey, in the pretesting, we evaluated public utility commissions reports, conducted cognitive interviews with potential respondents, and ran a pilot survey to collect data from both natural gas and electric utilities.

The pretesting work informed our design and addressed many of the concerns brought up in your comments. The public utility commissions data revealed inconsistencies across the states and frequently included many gaps that it is an insufficient replacement for a primary data collection of our own.

This collection does not duplicate existing data because no public source of comprehensive disconnection due to nonpayment exists.

Congress directed us to conduct this collection to estimate the population of customers currently facing disconnection due to nonpayment. Data used in the Low-Income Home Energy Program is informed by a variety of data sources, none of which purport to estimate the current level of disconnections in a state or utility service area.

These include data we collected as part of the quadrennial *Residential Energy Consumption Survey* (RECS), which is a voluntary household survey used to inform end-use estimates for energy consumption, among other things. Similarly, the *Current Population Survey* (CPS) conducted by the

U.S. Census Bureau informs population estimates and other social and economic indicators of the population within given geographic areas.

Data from grant recipients are useful at evaluating the effectiveness of grants but are only submitted from grant recipients, not the entire population of utilities providing natural gas and electric service. These collections do not duplicate existing data because they are answered by different populations of respondents and are attempting to evaluate different research questions.

Additional variables would provide context but also increase respondent burden.

Concerns about misinterpretation of the results were a key issue we attempted to address during pretesting. We conducted cognitive interviews to ensure that:

- Respondents were operating from shared definitions of concepts
- Data were available at the level we were requesting it
- We were limiting burden on respondents

The burden on respondents would increase significantly if we had adjusted Form EIA-112 to include additional detailed question on:

- Moratoria
- Population demographics
- Delays in delivery of final notices
- Advance outreach to customers ahead of disconnection
- The primary purpose of residences
- Other concerns brought up in the comments

We can combine demographic information we collected through RECS and CPS with data we collect on Form EIA-112 to gain insights into disconnection risk among specific groups. Because our initial goals for the Form EIA-112 were to estimate disconnections among natural gas and electric customers, we did not include demographics in our pretesting. Demographics are potential variables that we add to future clearance packages, but they would increase the burden on respondents that may not be tracking disconnections with those demographic indicators.

Survey frames and estimation procedures were designed to limit respondent burden.

We are attempting to balance the comprehensive nature of our collection with the burden on respondents, particularly on small electric utilities. Our survey design strikes a balance between the two, particularly by limiting collection to electric service providers that have annual sales of more than 200,000 megawatthours annually. The initial survey collecting a census followed by a sample based on the existing survey respondents for natural gas and electric utilities will also reduce burden on respondents.

We plan to estimate disconnections at a state level, at a monthly interval, and publish all information we collect.

This collection estimates, at the state level, the number of disconnections of electricity for electric and natural gas customers each month due to nonpayment. However, because none of this data has been deemed to be confidential or subject to disclosure review, we plan to publish the utility service area disconnections collected on the form. By publishing the data, additional researchers will have access to more geographic-based data or small area estimation that could inform future changes to the collection.

We appreciate the thoughtful comments submitted on this topic and look forward to working with you as we move forward with this collection.

Marc Harnish

From: Adam Cooper <ACooper@edisonfoundation.net>

Sent: Friday, August 16, 2024 6:50 PM

To: EIA112 <EIA112@eia.gov>

Cc: Sandra Safro <SSaфро@eei.org>; Alex Bond <ABond@eei.org>; Allison Poe <apoe@eei.org>; Patrice Hunter <phunter@eei.org>; Brian Reil <BReil@eei.org>; Stephanie Johnson <sjohnson@eei.org>; Caudill, Brian <bcaudill@aga.org>; Meyer, Richard <RMeyer@aga.org>; mmurray@aga.org; Lowe, George <GLowe@aga.org>; Duckman, Ashley <aduckman@aga.org>; Lapato, Daniel <DLapato@aga.org>

Subject: [EXTERNAL] Comments on proposed EIA Form-112 | AGA & EEI

Dear Mr. Harnish,

On behalf of the American Gas Association (AGA) and the Edison Electric Institute (EEI) please find attached a joint comment letter regarding the proposed EIA Form-112. We appreciate the opportunity to comment and we invite you to reach out to us with any questions you may have regarding this letter.

Please confirm receipt.

Sincerely,
Adam

Adam Cooper
Managing Director, Customer Solutions, Edison Electric Institute
Cell: 831-601-3795

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: [Patricia Taylor](#)
To: [EIA112](#)
Cc: [John Godfrey](#); [Latif Nurani](#); [Lindsey Buttel](#); [Patricia Taylor](#); [Desmarie Waterhouse](#); [Amy Thomas](#); [Crawford, Stephanie](#); [Dorjets, Vlad](#); [Sydney Novoa](#)
Subject: [EXTERNAL] Re: Notice and request for comments: Agency Information Collection Proposed New Survey
Date: Friday, August 16, 2024 4:34:59 PM
Attachments: [Final EIA Comments APPA APGA NRECA 08.16.24.pdf](#)

Mr. Harnish,

The American Public Gas Association, American Public Power Association, and National Rural Electric Cooperative Association appreciate this opportunity to comment on the Energy Information Administration's Notice and Request for Comment: Agency Information Collection Proposed New Survey. Please find our joint letter attached to this message and let us know if you have any questions.

Best,
Patricia

Organization Contacts:

Sydney Novoa, snovoa@apga.org, (202) 464-0834
Desmarie Waterhouse, DWaterhouse@PublicPower.org, (202) 467-2930
Stephanie Crawford, stephanie.crawford@nreca.coop, (703) 907-5732

Patricia Taylor
Director, Policy and Research
American Public Power Association
2451 Crystal Dr., Suite 1000, Arlington, VA 22202
P: 202.467.2989
M: 301.792.0222
ptaylor@publicpower.org
www.publicpower.org

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: [EIA112](#)
To: [Patricia Taylor](#)
Subject: RE: Re: Notice and request for comments: Agency Information Collection Proposed New Survey
Date: Tuesday, September 10, 2024 10:54:00 AM

Patricia,

We appreciate your comments on Form EIA-112, *Residential Utility Disconnections Survey*, regarding the potential burden to your members that this data collection represents and your thoughtful feedback on ways to avoid duplication with existing collection efforts.

This data collection responds directly to the current data gap in utility disconnections. We plan to provide a comprehensive dataset on the frequency and intensity of utility disconnections at the state level. We also plan to publish the data collected at the utility level, which can inform more detailed estimates than our state-level aggregate estimates.

We initiated this collection effort in response to language included in the Joint Explanatory Statement to the FY 2023 budget appropriations act, specifically, that Congress will provide funding:

“...to conduct a monthly survey of electric and heating service providers of final termination notices sent due to bill nonpayment, service disconnections due to bill nonpayment, and service reconnections of customers disconnected for bill nonpayment, in a form and manner determined by the agency.”

We conducted significant pretesting ahead of posting this survey instrument for public comment, as required under guidelines set forth in the Paperwork Reduction Act and Office of Management and Budget (OMB) Statistical Directive No. 2. To further refine the survey, in the pretesting, we evaluated public utility commissions reports, conducted cognitive interviews with potential respondents, and ran a pilot survey to collect data from both natural gas and electric utilities.

The pretesting work informed our design and addressed many of the concerns brought up in your comments. The public utility commissions data revealed inconsistencies across the states and frequently included many gaps that it is an insufficient replacement for a primary data collection of our own.

This collection does not duplicate existing data because no public source of comprehensive disconnection due to nonpayment exists.

Congress directed us to conduct this collection to estimate the population of customers currently facing disconnection due to nonpayment. Data used in the Low-Income Home Energy Program is informed by a variety of data sources, none of which purport to estimate the current level of disconnections in a state or utility service area.

These include data we collected as part of the quadrennial *Residential Energy Consumption Survey* (RECS), which is a voluntary household survey used to inform end-use estimates for energy consumption, among other things. Similarly, the *Current Population Survey* (CPS) conducted by the

U.S. Census Bureau informs population estimates and other social and economic indicators of the population within given geographic areas.

Data from grant recipients are useful at evaluating the effectiveness of grants but are only submitted from grant recipients, not the entire population of utilities providing natural gas and electric service. These collections do not duplicate existing data because they are answered by different populations of respondents and are attempting to evaluate different research questions.

Additional variables would provide context but also increase respondent burden.

Concerns about misinterpretation of the results were a key issue we attempted to address during pretesting. We conducted cognitive interviews to ensure that:

- Respondents were operating from shared definitions of concepts
- Data were available at the level we were requesting it
- We were limiting burden on respondents

The burden on respondents would increase significantly if we had adjusted Form EIA-112 to include additional detailed question on:

- Moratoria
- Population demographics
- Delays in delivery of final notices
- Advance outreach to customers ahead of disconnection
- The primary purpose of residences
- Other concerns brought up in the comments

We can combine demographic information we collected through RECS and CPS with data we collect on Form EIA-112 to gain insights into disconnection risk among specific groups. Because our initial goals for the Form EIA-112 were to estimate disconnections among natural gas and electric customers, we did not include demographics in our pretesting. Demographics are potential variables that we add to future clearance packages, but they would increase the burden on respondents that may not be tracking disconnections with those demographic indicators.

Survey frames and estimation procedures were designed to limit respondent burden.

We are attempting to balance the comprehensive nature of our collection with the burden on respondents, particularly on small electric utilities. Our survey design strikes a balance between the two, particularly by limiting collection to electric service providers that have annual sales of more than 200,000 megawatthours annually. The initial survey collecting a census followed by a sample based on the existing survey respondents for natural gas and electric utilities will also reduce burden on respondents.

We plan to estimate disconnections at a state level, at a monthly interval, and publish all information we collect.

This collection estimates, at the state level, the number of disconnections of electricity for electric and natural gas customers each month due to nonpayment. However, because none of this data has been deemed to be confidential or subject to disclosure review, we plan to publish the utility service area disconnections collected on the form. By publishing the data, additional researchers will have access to more geographic-based data or small area estimation that could inform future changes to the collection.

We appreciate the thoughtful comments submitted on this topic and look forward to working with you as we move forward with this collection.

Marc Harnish

From: Patricia Taylor <ptaylor@publicpower.org>

Sent: Friday, August 16, 2024 4:31 PM

To: EIA112 <EIA112@eia.gov>

Cc: John Godfrey <jgodfrey@publicpower.org>; Latif Nurani <lnurani@publicpower.org>; Lindsey Buttel <LButtel@publicpower.org>; Patricia Taylor <ptaylor@publicpower.org>; Desmarie Waterhouse <dwaterhouse@publicpower.org>; Amy Thomas <athomas@publicpower.org>; Crawford, Stephanie <Stephanie.Crawford@nreca.coop>; Dorjets, Vlad <Vlad.Dorjets@nreca.coop>; Sydney Novoa <snovoa@apga.org>

Subject: [EXTERNAL] Re: Notice and request for comments: Agency Information Collection Proposed New Survey

Mr. Harnish,

The American Public Gas Association, American Public Power Association, and National Rural Electric Cooperative Association appreciate this opportunity to comment on the Energy Information Administration's Notice and Request for Comment: Agency Information Collection Proposed New Survey. Please find our joint letter attached to this message and let us know if you have any questions.

Best,
Patricia

Organization Contacts:

Sydney Novoa, snovoa@apga.org, (202) 464-0834

Desmarie Waterhouse, DWaterhouse@PublicPower.org, (202) 467-2930

Stephanie Crawford, stephanie.crawford@nreca.coop, (703) 907-5732

Patricia Taylor

Director, Policy and Research

American Public Power Association

2451 Crystal Dr., Suite 1000, Arlington, VA 22202

P: 202.467.2989

M: 301.792.0222
ptaylor@publicpower.org
www.publicpower.org

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.
