

**From:** [Ambrose, Madison \(AGO\)](#)  
**To:** [EIA112](#)  
**Cc:** [Aris, Julian \(AGO\)](#)  
**Subject:** [EXTERNAL] Form EIA-122 AGO Comments  
**Date:** Monday, August 19, 2024 4:22:22 PM  
**Attachments:** [EIA-122 AGO Comments.pdf](#)

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Good afternoon,

On behalf of the Office of the Attorney General, Assistant Attorney General Julian Aris submits the enclosed Comments pertaining to Form EIA-122. Thank you for your attention to this filing.

Sincerely,

Madison Ambrose

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*Madison Ambrose (She/Her)*  
*Paralegal*  
*Office of the Attorney General*  
*Energy & Environment Bureau*  
*Energy & Ratepayer Advocacy Division*  
[Madison.Ambrose@mass.gov](mailto:Madison.Ambrose@mass.gov)  
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**From:** [EIA112](#)  
**To:** ["Ambrose, Madison \(AGO\)"](#)  
**Subject:** RE: Form EIA-122 AGO Comments  
**Date:** Tuesday, September 10, 2024 10:40:00 AM

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Madison,

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 LIHEAP participation or other assistance programs. [LIHEAP data](#) is available on the U.S. Department of Health and Human Services website. 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

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**From:** Ambrose, Madison (AGO) <Madison.Ambrose@mass.gov>  
**Sent:** Monday, August 19, 2024 4:18 PM  
**To:** EIA112 <EIA112@eia.gov>  
**Cc:** Aris, Julian (AGO) <Julian.Aris@mass.gov>  
**Subject:** [EXTERNAL] Form EIA-122 AGO Comments

Good afternoon,

On behalf of the Office of the Attorney General, Assistant Attorney General Julian Aris submits the enclosed Comments pertaining to Form EIA-122. Thank you for your attention to this filing.

Sincerely,

Madison Ambrose

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