

**From:** [Maria Castillo](#)  
**To:** [EIA112](#)  
**Cc:** [Joseph Daniel](#)  
**Subject:** [EXTERNAL] RMI Comments on EIA Form 112  
**Date:** Thursday, August 15, 2024 6:36:57 PM  
**Attachments:** [RMI Comments on EIA Form 112.docx](#)

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Good afternoon Mr. Harnish,

RMI is very grateful to be able to comment on the proposed new EIA form 112. See attached.

Warmly,

Maria



**Maria Castillo**  
**Senior Associate RMI**  
**Carbon-Free Electricity**

**p** 956-324-1303

**e** [mcastillo@rmi.org](mailto:mcastillo@rmi.org)

**|** 2490 Junction PI #200, Boulder, CO 80301



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**From:** [EIA112](#)  
**To:** [Maria Castillo](#)  
**Subject:** RE: RMI Comments on EIA Form 112  
**Date:** Tuesday, September 10, 2024 10:29:00 AM

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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 to 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

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**From:** Maria Castillo <mcastillo@rmi.org>  
**Sent:** Thursday, August 15, 2024 6:29 PM  
**To:** EIA112 <EIA112@eia.gov>  
**Cc:** Joseph Daniel <JDaniel@rmi.org>  
**Subject:** [EXTERNAL] RMI Comments on EIA Form 112

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RMI is very grateful to be able to comment on the proposed new EIA form 112. See attached.

Warmly,

Maria

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