

From: [EIA112](#)
To: [Kathleen Saul](#)
Subject: RE: [EXTERNAL] Residential Utility Disconnections Survey
Date: Tuesday, September 10, 2024 10:37:00 AM

Kathleen,

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 a utility's payment or outreach plans. 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: Kathleen Saul <kmsaul@comcast.net>
Sent: Friday, August 16, 2024 3:59 PM
To: EIA112 <EIA112@eia.gov>
Subject: [EXTERNAL] Residential Utility Disconnections Survey

It is vital to the provision of adequate and just energy services that utilities be required to prepare the Residential Utility Disconnections Survey as outline in the Federal Register, Vol. 89, No. 119, Thursday, June 20, 2024. Access to energy is not a luxury in modern society, it is required to maintain healthy environments, adequate schooling, and job situations for all Americans. For too long, utilities have been hiding the facts of disconnections, including the fact that most of those disconnections occur in communities of color, among people for whom English is not their first language, or in homes led by single mothers (per data from Washington State). Rather than getting at the root of the problem, utilities attempt to manage the service that they are

contractually required to provide by cutting off service to those most in need. By making these data more widely available to policy-makers, we can better understand the scope of this problem and develop plans to meet the needs of every single person, not just the wealthy.

I further recommend that you expand the data collection to include information at the zip code level of aggregation so that it can be easily paired with other federal data, like census data and community service data.

More information about what types of payment plans the utilities have in place, the durations of disconnections, and the types of outreach the utilities are conducting should also be included. The more we know, the more we can do to help our friends and neighbors.

Thank you,
Kathleen M. Saul, Ph.D.
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