From:	Anna Shugoll
To:	EIA112
Cc:	Nidhi Krishen; Elizabeth Lankenau
Subject:	[EXTERNAL] EIA Request for Comments: Utility Shutoff Survey
Date:	Friday, August 16, 2024 3:21:59 PM
Attachments:	image001.png
	20240816_EIA Comments_Utility Shutoff Survey_OOS Philadelphia.pdf

Dear Mr. Harnish,

On behalf of the City of Philadelphia's Office of Sustainability, I am writing to submit our comments in response to the Energy Information Administration's (EIA) request for feedback on the proposed Residential Utility Disconnections Survey (EIA-112).

Please find the attached document containing our detailed observations and suggestions. We appreciate the opportunity to contribute to this important initiative and are available to discuss any points further if needed.

Thank you for considering our input.

Best,

Anna Shugoll
Program Manager, Energy Services
City of Philadelphia | Office of Sustainability
1515 Arch Street, 18-024 | Philadelphia, PA 19102
t: (215) 686-4472
Pronouns: she/her/hers

Anna,

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 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 accounts referred to debt collection companies. If approved, this survey will be valid for the usual three-year period, at which time, 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: Anna Shugoll <Anna.Shugoll@phila.gov>
Sent: Friday, August 16, 2024 3:19 PM
To: EIA112 <EIA112@eia.gov>
Cc: Nidhi Krishen <Nidhi.Krishen@phila.gov>; Elizabeth Lankenau <Elizabeth.Lankenau@Phila.gov>
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