

**UNITED STATES OF AMERICA
BEFORE THE
ENERGY INFORMATION ADMINISTRATION**

Agency Information Collection
Proposed New Survey

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) Comments on Proposed Form EIA-112

**COMMENTS OF THE MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL**

Pursuant to the Energy Information Administration’s (“EIA”) June 20, 2024 Notice and Request for Comments¹ on Proposed Form EIA-112,² the Massachusetts Office of the Attorney General (“MA AGO”) provides the following comments.

I. Introduction

The Massachusetts Attorney General is the chief legal officer of the Commonwealth of Massachusetts and is authorized by state law to institute proceedings in the public interest before state and federal courts, tribunals, and commissions.³ The MA AGO strongly supports the proposed survey “to collect data from electric and natural gas providers regarding final termination notices, service disconnections, and reconnections for bill non-payment across residential customers.”⁴

Energy affordability is a challenge around the nation, and, as discussed below, is of particular concern for low-income and BIPOC⁵ households. Lack of national data on

¹ Agency Information Collection: Proposed New Survey, 89 Fed. Reg. 51882 (June 20, 2024).

² Residential Utility Disconnections Survey Instructions, *available at* https://www.eia.gov/survey/form/eia_112/proposed/2024/EIA112_instructions.pdf.

³ RFI, 86 Fed. Reg. 226, at 67,782–67,785 (Nov. 29, 2021).

⁴ Individual Form Descriptions, EIA-112, <https://www.eia.gov/survey/#eia-112>.

⁵ Black, Indigenous, and People of Color.

disconnections, however, creates a problematic data gap that makes it difficult to assess and address rising concerns around energy affordability.⁶ The Low-Income Home Energy Assistance Program (“LIHEAP”) is a central feature of the federal energy affordability policy landscape, and it is essential that the funding and administration of the program be driven by analysis of reliable, comprehensive data to ensure its effectiveness. The EIA’s proposed survey is designed to gather this data, which will be necessary for budgetary decision-making going forward.⁷

The MA AGO therefore supports EIA’s proposed survey regarding residential disconnections, and makes the following recommendations to enhance the proposed survey’s value to policymakers, researchers, and advocates:

- Gather all data at the census tract (or similarly granular) geographic scale;
- Collect data regarding residential customer arrearages and payment plans; and
- Collect data regarding customer participation in LIHEAP and other energy assistance programs (“EAPs”), and data regarding energy affordability indicators for the customers receiving LIHEAP and other energy bill assistance.

II. Comments

A. Disconnection has a profound impact on several dimensions of household wellbeing.

People rely on electricity for water, physical safety, food security, medical care and telecommunications, and for heat and cooling. Without essential energy services, households

⁶ Memmott, T. et al., *Utility disconnection protections and the incidence of energy insecurity in the United States* (February 2023), <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC10025124/>, at 2 (“One reason for the paucity of disconnection protection policies analysis is data limitations. Historically, few utilities have released disconnection information and, even when publicly available, the data are not granular enough to link them to household-level characteristics.”).

⁷ EIA-112 *Residential Utility Disconnections Survey* Instructions, https://www.eia.gov/survey/form/eia_112/proposed/2024/EIA112_instructions.pdf (“The EIA-112 aims to better inform policymakers with authority over the Low-Income Home Energy Assistance Program (LIHEAP) Data from the new survey will aid in setting appropriate levels of budgetary support for the LIHEAP by providing reliable metrics on the frequency of utility disconnections among commodities between states.”).

may suffer from instability or from unlivable or dangerous conditions (i.e., without energy, people may struggle to maintain employment, keep kids in school, and maintain a safe indoor air temperature).⁸ Disconnections can cause or exacerbate health problems.⁹ Disconnection may put people at risk of heat stroke and heat illness during high summer temperatures and hypothermia during extreme winter temperatures. Disconnections may also impact respiratory health due to the loss of proper ventilation and from fumes that may be caused by households heating with an oven or a diesel generator without proper ventilation. Further, indirect health risks arise from lack of access to hot water for proper hygiene.¹⁰

Disconnections may also lead to deaths that were otherwise preventable. Duke University researchers conducted a retrospective comparison of Covid death rates in places with and without bans on utility disconnections. They concluded that, if a national moratorium on utility disconnections had been in place from March through November 2021, overall Covid death rates would have been 14.8 percent lower.¹¹ Thus disconnections can lead to serious health risks.

Alarming, recent analysis estimated that power was shutoff to households 4.2 million times in the first 10 months of 2022.¹² It is vital to the effective funding and administration of the LIHEAP program that there be a national, publicly accessible database that records statistics about termination notices and disconnections for nonpayment.

⁸ Bell, S.G., et. al., *Powerless in the United States: How Utilities Drive Shutoffs and Energy Injustice* (January 19, 2023) https://www.biologicaldiversity.org/programs/energy-justice/pdfs/Powerless-in-the-US_Report.pdf.

⁹ Bhavsar, N., et al., *Housing Precarity & the COVID-19 Pandemic: Impacts of Utility Disconnection and Eviction Moratoria on Infections and Deaths Across US Counties* (January 2021) <https://www.nber.org/papers/w28394>.

¹⁰ Diana Hernández & Jennifer Laird, *Surviving a Shut-Off: U.S. Households at Greatest Risk of Utility Disconnections and How They Cope* (May 8, 2021), <https://doi.org/10.1177/00027642211013401>.

¹¹ Bhavsar, N., et al., *supra* note 9.

¹² Bell, S.G. et al., *supra* note 8.

B. The changing climate, energy transition, and economic factors are creating nationwide energy affordability challenges.

Between 2018 and 2023, average US household electricity prices rose 21.9 percent.¹³ In several states, the price rise exceeded 45 percent.¹⁴ These rising prices create clear affordability challenges for low-income and financially vulnerable households, and, according to a July 16, 2024 report from the National Energy Assistance Directors Association and the Center for Energy Poverty and Climate, nearly 24 percent of US households reported being unable to pay at least one monthly energy bill over the past year—a number that rose to 32 percent for households of color and 37 percent for low- and moderate-income households.¹⁵

Viewed through another lens, research from the American Council for an Energy-Efficient Economy (“ACEEE”) found that “25% of all U.S. households shoulder a high energy burden—that is, they pay more than 6% of their income on utility bills.”¹⁶ The same report noted amongst its “Key Findings” that “[f]or LMI¹⁷ households, bill affordability remains an acute, ongoing issue. . . . [W]hile many jurisdictions provide bill discounts for low-income ratepayers, such discounts do not always result in an affordable bill.”¹⁸ Affordability challenges are particularly acute for LMI households and households of color.¹⁹ Disconnection policies

¹³ Rives, K., *Rising US power prices reflect new reality for utilities in warming world* (July 29, 2024), <https://www.spglobal.com/marketintelligence/en/news-insights/latest-news-headlines/rising-us-power-prices-reflect-new-reality-for-utilities-in-warming-world-82591284>.

¹⁴ *Id.*

¹⁵ *Id.* (citing Wolfe, M., *Summer Residential Cooling Outlook: Residential Electric utility Expenditures Projected to Reach Record Levels, Highest in 10 years* (June 3, 2024), <https://neada.org/wp-content/uploads/2024/06/2024summeroutlook.pdf>.)

¹⁶ Edward Yim & Sagarika Subramanian, *Equity and Electrification-Driven Rate Policy Options* (September 2023), at 1, <https://www.aceee.org/white-paper/2023/09/equity-and-electrification-driven-rate-policy-options>.

¹⁷ Low- and moderate-income.

¹⁸ *Id.* at iv.

¹⁹ Rives, *supra* note 13, at 3 (“Nearly 24% of US households said they were unable to pay at least one monthly energy bill in the past year That number rose to 32% for households of color and 37% for low- and moderate-income households.”).

disproportionately impact households of color.²⁰ This remains the case even when controlling for income and other socioeconomic factors,²¹ and is especially pronounced for Black households.²²

²⁰ Cicala, S., *The Incidence of Extreme Economic Stress: Evidence from Utility Disconnections* (August 2021), <https://doi.org/10.1016/j.jpubeco.2021.104461> (noting that researchers have found that disconnections are more prevalent in minority communities, and showing that, in 2018-2019, “customers in Black and Hispanic zip codes” were about four times more likely to be disconnected for non-payment, two to three “times more likely to be on deferred payment plans, and 70% more likely to participate in utility-based low-income assistance programs[.]”); Konisky, D.M., et al., *The persistence of household energy insecurity during the COVID-19 pandemic* (September 23, 2022), <https://iopscience.iop.org/article/10.1088/1748-9326/ac90d7/meta> (surveying low-income households and finding that Black, Hispanic, and medically compromised individuals were less likely to be able to pay monthly energy bills and more likely to receive disconnection notices); Memmott, T., et al., *Sociodemographic disparities in energy insecurity among low-income households before and during the COVID-19 pandemic* (January 18, 2021), <https://doi.org/10.1038/s41560-020-00763-9> (surveying low-income households and finding that Black, Hispanic, and medically compromised individuals were less likely to be able to pay monthly energy bills and more likely to receive disconnection notices); National Consumer Law Center, *Implementing a Roadmap to Utility Service as a Human Right* (April 2021), https://www.nclc.org/wp-content/uploads/2022/09/IB_Utility_Bill_of_Rights.pdf (“Reliance on disconnections as a collections tool has the effect of punishing people for being poor, and ignores the longstanding racial and economic discrimination that have created the disparities that fuel poverty and the unaffordability of utility services.”); *Direct Testimony of John Howat on Behalf of The Massachusetts Energy Directors’ Association*, Commonwealth of Massachusetts Department of Public Utilities, Petition of Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid, pursuant to G.L. c. 164, § 94 and 220 CMR 5.00, for Approval of a General Increase in Base Distribution Rates for Electric Service, a Performance-Based Ratemaking Plan, and a Capital Recovery Mechanism (D.P.U. 23-150), at 44 (“I examined zip code level disconnections data provided by National Grid. . . . The data show a striking overlap between race and service disconnections. The [data] shows that among the 20 zip codes with the highest disconnections ratio, 9 were among the top 20 zip codes with the highest non-white populations.”); *Surrebuttal Testimony of John Howat on Behalf of The Massachusetts Energy Directors’ Association*, National Grid Petition for Approval of Increase in Electric Service Rates (D.P.U. 23-150), at 23 (“I also noted . . . that the links between race and energy insecurity are also clear based on the U.S. Energy Information Administration’s 2020 Residential Consumption Survey. The data showed, for example, that Black households are nearly 3 times more likely than White households to be unable to use heating equipment because of disconnection or failed equipment, and are twice as likely to experience some form of energy insecurity than their White counterparts.”) (citations omitted).

²¹ D.P.U. 24-15, *Comments of the National Consumer Law Center on Behalf of Our Low-Income Clients*, at 15 (“Analysis of data on utility disconnections has revealed that disconnections disproportionately impact communities of color, even when controlling for income.”) (citing Cicala, S., *supra* note 20).

²² Baik, S., et al., *Racial disparities in the energy burden beyond socio-economic inequality*, *Energy Economics* 127 (2023) 107098, at 2 (“We find three key results. First, we show a statistically and economically significant energy burden gap between Blacks and others inexplicable by socio-economic inequality. To be specific, after controlling for 56 variables related to socio-economic status, Black households’ annual energy expenditure exceeds that of the other groups by US\$120.2 on average. This implies that Black households in the U.S. annually bear an extra combined energy burden of US\$1.64 billion. Moreover, the additional burden borne by Black households is larger in the high-income group than in the low-income group. This provides further evidence that the estimated gap is unlikely to be a mere consequence of socio-economic inequality, as the high-income group can afford investments in energy efficiency. Notably, Hispanic households do not present similar patterns, suggesting that this gap is likely associated with racial rather than ethnic differences.”) (citations omitted).

Energy affordability challenges are likely to continue increasing in the near future. Recently, “utility bills have been increasing due to extreme weather events such as severe storms and wildfires and the recent sharp increases in fossil fuel prices due to the war in Ukraine.”²³ Experts predict that climate change will exacerbate these and other issues as global temperatures continue to rise, with higher temperatures leading to worse outcomes.²⁴ The Intergovernmental Panel on Climate Change (“IPCC”) predicts that storms and extreme weather events will increase in frequency and intensity in the coming years.²⁵ The IPCC also predicts the “intensification of tropical cyclones and/or extratropical storms (*medium confidence*), and increases in aridity and fire weather (*medium to high confidence*),” as well as more frequent “[c]ompound heatwaves and droughts . . . including concurrently at multiple locations (*high confidence*).”²⁶ Over the next 15 years, “every region in the world is projected to face further increases in climate hazards (*medium to high confidence*, depending on region and hazard).”²⁷

As an added concern, the impacts of the associated losses and damages will “be strongly concentrated among the poorest vulnerable populations (*high confidence*).”²⁸ “Globally,

²³ Yim & Subramanian, *supra* note 16, at 1.

²⁴ Lee, H., et. al., *Climate Change 2023: Synthesis Report. Contribution of Working Groups I, II and III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change*, at 69 (“Many changes in the climate system become larger in direct relation to increasing global warming. With every additional increment of global warming, changes in extremes continue to become larger.”).

²⁵ *Id.* (“Continued global warming is projected to further intensify the global water cycle, including its variability, global monsoon precipitation, and very wet and very dry weather and climate events and seasons (*high confidence*). The portion of global land experiencing detectable changes in seasonal mean precipitation is projected to increase (*medium confidence*) with more variable precipitation and surface water flows over most land regions within seasons (*high confidence*) and from year to year (*medium confidence*). . . . Increases in hot and decreases in cold climatic impact-drivers, such as temperature-extremes, are projected in all regions (*high confidence*). At 1.5°C global warming, heavy precipitation and flooding events are projected to intensify and become more frequent in most regions in Africa, Asia (*high confidence*), North America (*medium to high confidence*) and Europe (*medium confidence*). At 2°C or above, these changes expand to more regions and/or become more significant (*high confidence*)”) (citation omitted).

²⁶ *Id.*

²⁷ *Id.* at 98.

²⁸ *Id.* at 99.

nationally, and regionally, low income communities and communities of color are slated to be hit ‘first and worst’ by climate change impacts.”²⁹ The pattern that emerges is that the communities already struggling the most with energy insecurity and the threat of disconnection are the same communities that will be hit fastest and hardest by the deleterious effects of the changing climate.

Simultaneously, a variety of factors are set to cause increasing energy prices in the near future. In many places, the increasing costs of repairing damaged infrastructure, and the prophylactic measures being taken to prevent future damage from the increasing threat of fires and severe storms, are already causing energy prices to rise.³⁰ Additionally, adapting and expanding the nation’s energy infrastructure to accommodate both the transition to renewable energy and the push towards electrification will further increase energy costs for ratepayers. With respect to energy affordability concerns, this is a perfect storm.

As these overlapping challenges threaten already-overburdened low-income and BIPOC communities, policymakers will need access to data that enables a thorough and appropriate response. This data must cover a large enough range of time to observe trends as they develop and establish baselines for evaluating LIHEAP’s efficiency and effectiveness over time. Data regarding termination notices and disconnections for non-payment are key features of the energy affordability landscape. Additionally, meaningful participation in policymaking by impacted communities is an essential element of an efficient, effective, just, and equitable energy

²⁹ Office of Massachusetts Attorney General Maura Healey, *COVID-19’s Unequal Effects in Massachusetts: Remediating the Legacy of Environmental Injustice & Building Climate Resilience* (2020), at 7 (citing Dooling, Shannon, “Hit First and Worst”: Region’s Communities of Color Brace for Climate Change Impacts, WBUR, July 26, 2017, accessed at <https://www.wbur.org/news/2017/07/26/environmental-justice-bostonchelsea>).

³⁰ Rives, *supra* note 13, at 1-2.

transition,³¹ and maintaining this data in a public and published form is vital to enabling that participation.³²

- C. LIHEAP provides a critical energy security service, so securing the correct amount of LIHEAP funding and effectively identifying and reaching target households will be key to addressing energy affordability challenges in the coming decades.

A recently published study of utility disconnection protections and the incidence of energy insecurity nationwide showed that voluntary and seasonal protections are not preventing disconnections or significantly reducing the likelihood that a household would forego non-utility-related expenses.³³ The same study, notably, found that “our current stable of welfare programs, including . . . energy specific programs, like LIHEAP, do not statistically reduce one’s likelihood of being disconnected or a household’s need to forgo medical and food expenditures. This finding stresses the importance of funding and expanding energy assistance programs that are accessible and available to low-income populations to avoid the most deleterious impacts of

³¹ McAdams, J., *Public Utility Commission Stakeholder Engagement: A Decision-Making Framework*, National Association of Regulatory Utility Commissioners (January 2021), at 7 (“Decisions relevant to these topic areas, which are often interrelated, have highlighted the benefits of transitioning from traditional to emerging regulatory processes that enable increased and improved stakeholder engagement. . . . When the stakeholder engagement process is well-designed, the benefits are actualized as ‘better information, decreased risk, and smarter solutions’ for all parties.”); Eric Sippert, *Public Engagement and the Public Utilities Commission: Paths to 100% Renewable Energy in Hawaii* (filed to Docket No. 2022-0250), at 2 (“Enhancing public input could broaden energy regulators’ understanding of the complexities of the energy landscape, help find more equitable pathways for infrastructure change, and assist the transition to lower carbon energy sources.”) (quoting Christopher Tonnu Jackson, *Putting the Public in Public Utilities Commissions*, *Issues in Science and Technology* 38, no. 1 (Fall 2021), at 23-25, <https://issues.org/public-utilities-commissions-public-participation-energy-regulation/>); *Id.* at 6 (“The promise of increased engagement and participation is a quicker, cheaper, and more just renewable energy transition.”); Baker, E., et al., *Metrics for Decision-Making in Energy Justice*, *Annual Review of Environment and Resources* (2023), <https://www.nrel.gov/docs/fy24osti/86268.pdf>, at 739-40 (“Procedural energy justice is primarily concerned with asking whether the processes, including policy-making, are fair. The focus is on rules and participation. One key to achieving a just and fair energy system is ensuring that disadvantaged and underserved communities participate in or lead decision-making processes.”) (citation omitted).

³² McAdams, *supra* note 31, at 8 (noting that one of the challenges to actualizing the benefits of robust stakeholder engagement is “[s]takeholder knowledge: limited background knowledge can potentially limit the ability for stakeholders to participate in a meaningful way,” and pointing to “maximiz[ing] use of data [and] promot[ing] information sharing” as key characteristics of beneficial emerging regulatory processes) (citations omitted).

³³ Memmott, T., et. al., *supra* note 6.

energy insecurity.”³⁴ A comprehensive national dataset tracking termination notices and disconnections is vital to proper LIHEAP budgetary decision-making, and will aid in assessing whether the program is accessible to the target populations and how assistance might be more effectively distributed to households in need.

D. The data gathered by this proposal will have several valuable overflow benefits beyond informing the administration of the LIHEAP program.

As discussed above, energy affordability is a growing challenge nationwide, and stands to become even more challenging due to the changing climate and rising energy prices. A robust array of federal, state, and local policies will be required to respond to the developing situation and ensure that vulnerable populations maintain affordable access to vital utility services and are not left behind in the energy transition process. Nationwide surveys like EIA’s proposed survey will provide tremendously valuable overflow benefits by creating a reliable, long-term database containing essential statistics that will be accessible to regulators, advocates, and policymakers nationwide. The data the proposed survey will collect will provide substantial benefits not just for LIHEAP administration, but also for policymaking (and evaluation) at the state and local levels, as well as any potential future federal policymaking addressing energy affordability outside of the LIHEAP program. The substantial general value this survey will provide, all at a very low cost to each impacted utility,³⁵ makes the EIA-112 proposal a “must have” policy that the MA AGO strongly supports.

E. The MA AGO recommends modifications and additions to the data the EIA-112 survey proposes to collect.

³⁴ *Id.* (emphasis added).

³⁵ 89 Fed. Reg., at 51883 (estimating a total annual cost of \$206,021.60, based on an annual estimated number of respondents of 1,130 and an estimated 2 burden hours at \$91.16 per hour.).

The creation of the EIA's proposed survey represents a valuable opportunity to procure important information about energy affordability and its impacts on customers around the nation. The MA AGO recommends enhancing the value of the data the proposed survey will already collect by requiring utilities to report the requested information at the census tract (or similarly granular) geographic scale. Zip codes are often so large and thus so economically and demographically diverse that a limited amount can be gleaned from data collected at that scale.³⁶ The MA AGO also recommends adding the following additional reporting requirements to the proposed survey to gather crucial data for painting a comprehensive picture of the national energy affordability landscape and associated customer impacts.

- i. The EIA-112 survey should collect data regarding residential customer arrearages and payment plans.

Arrearage data reveals a lot about energy affordability and is informative as to whether LIHEAP funding is sufficient to provide the needed aid. It is also informative as to how many households are at risk of disconnection, and, based on the age and size of their arrears, how at risk of disconnection they may be. Data regarding arrearage age and amount, as well as data on payment plan participation, are necessary for evaluating whether LIHEAP dispersals (and/or other energy assistance programs ("EAPs")) are providing sufficient aid to create affordable energy burdens. The proposed EIA-112 survey should therefore be updated to include requests for the following information, to be reported annually, per the geographic unit selected for the EIA-112 reporting requirements, for each month of the reporting year:

³⁶ Sydney P. Forrester and Andrew J. Satchwell, *Developing an Equity Framework for State Regulatory Decision-Making*, Lawrence Berkeley National Laboratory: Energy Analysis & Environmental Impacts Division (August 2023), https://live-etabiblio.pantheonsite.io/sites/default/files/equity_in_reg_decision_making.pdf, at 5 ("One consideration when choosing indicators is to select geographic areas large enough to provide sufficient data but granular enough to capture distributional inequity, based on the assumption that the smaller the geography, the more households may resemble their neighbors. Many states have chosen census tracts for this purpose, which are generally smaller than a zip code but larger than census block groups.").

- Number of customers in arrears;
- Average arrearage age and amount;
- Number of customers on arrearage management plans (AMPs) or similar payment plans;
- Number of customers who missed one or more payments on an AMP or similar payment plan; and
- Number of customers removed from an AMP or similar payment plan for missing one or more payments.

ii. The EIA-112 survey should collect data regarding customer participation in LIHEAP and other EAPs, and data regarding energy affordability indicators for the customers receiving LIHEAP and other energy bill assistance.

Not all customers facing energy affordability challenges are participating in LIHEAP or other EAPs. The reasons for nonparticipation are varied, but, for policymaking purposes, it is necessary to gather information in a way that distinguishes between energy insecure households receiving LIHEAP or other assistance and energy insecure households not receiving LIHEAP or other assistance. Which group households fall into has implications for the barriers and challenges they face, and the solutions that might help them escape energy insecurity.

An energy insecure household that is not receiving LIHEAP, for example, might be unaware that LIHEAP exists, ineligible for LIHEAP assistance, too overwhelmed by the LIHEAP application process to finish applying, or perhaps simply unaware that they are eligible for LIHEAP assistance. Such a household is no better served by an expansion to the LIHEAP budget, because the barriers they face relate to education, access, and eligibility. On the other hand, a household receiving LIHEAP assistance that still faces substantial arrears or suffers disconnection for nonpayment would likely be helped by an increased LIHEAP budget and larger amounts of assistance. Without data to help policymakers understand these nuances of the energy affordability and insecurity landscape, it will not be possible for them to tailor the budgetary decisions and programmatic solutions to the actual challenges and barriers that need to

be overcome. The AGO therefore recommends that the EIA-112 survey collect data from each utility regarding customer participation in LIHEAP and other EAPs, and that this data request include requiring the utility to annually report, per the geographic unit selected for the EIA-112 reporting requirements, for each month of the reporting year, the following information:

- The number of customers receiving LIHEAP, and the average amount of LIHEAP dispersal;
- The number of customers receiving an income-qualified discounted rate (if applicable);
- The number of customers receiving assistance from other EAPs, and the average amount being received per each EAP (if applicable and reasonably obtainable);
- The number and proportion of customers receiving LIHEAP who are also in arrears, as well as the average amount and age of those arrears;
- The number and proportion of customers receiving LIHEAP who are also on arrearage management plans, or any analogous form of payment plan;
- The number and proportion of customers receiving LIHEAP who have received a final notice;
- The number and proportion of customers receiving LIHEAP who have been disconnected for non-payment; and
- The number of customers receiving LIHEAP who were reconnected after being disconnected for non-payment.

This data will enable policymakers to better understand the complexities and nuances of the energy insecurity landscape, and make budgetary and policy decisions that target the observed barriers and challenges faced by energy burdened and energy insecure households across the nation.

III. Conclusion

For the reasons stated above, the MA AGO strongly supports the EIA-112 proposed survey to annually collect monthly data on residential customer counts, final notices, disconnections for non-payment, and reconnections.

Sincerely,

/s/ Julian Aris

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