

**Service Disconnection
Reporting Requirements for
Electric, Gas, Sewer, and
Water Utilities Serving More
than 2,000 Residential
Customers**

*A Second Virtual Rulemaking
Workshop*

February 25, 2022

Agenda

- OPC Presentation
- Open Discussion of Updated Proposed Rule
 - Constructive feedback
 - Suggestions for improvement

Overview of OPC Presentation

- Where have we been?
- Where are we now?
- Where are we going?

Where Have We Been?

- NARUC Resolution
- Initial Proposed Rule
- Dr. Geoff Marke Memorandum
- November 2020 Workshop

2019 NARUC Resolution

- Recognizes
 - High energy burdens for low-income households
 - Insufficient funding to meet needs
 - Low-income households postpone important purchases
 - Evidence-based policy making improves outcomes
 - Data collection and sharing is important

2019 NARUC Resolution

- Encourages
 - Standardization of data collection
 - Identification and sharing of best practices
 - Collection and sharing of data
- States should consider requiring utilities to
 - Collect monthly data
 - Make monthly data publically available
 - File data with the Commission for publication on website

Dr. Marke's Memo

- Looked to Cold Weather Reports and Annual Reports
- Problems with publically-available data
 - Water does not report disconnections
 - Information not easily accessible
 - Considerably variation in data
- Unable to draw conclusions based on available data

Dr. Marke's Memo

- Recommendation: Rulemaking workshop designed to
 - Standardize definitions
 - Increase transparency
 - Draw greater attention to vulnerable customer populations

Initial Proposed Rule

- No location specified within current Commission Rules
- 13 definitions
- 22 data reporting points
- Staff compiled *Annual Customer Disconnection Report*

November 2020 Workshop

- Commissioner Coleman and Dr. Marke presentation
- Open discussion of the proposed definitions
- Solicited feedback and recognized different practices

Overview of OPC Presentation

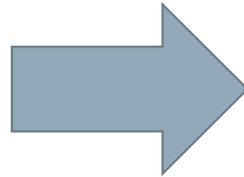
- Where have we been?
- Where are we now?
- Where are we going?

Where Are We Now?

Revised Proposed Rule

Revised Proposed Rule

Initial Proposed Rule
No location specified
13 Definitions
22 Data Reporting Points
Applied to all investor-owned utilities
Approximately 1,500 words



Revised Proposed Rule
Include in Chapter 13
2 Definitions
12 Data Reporting Points
Applies to investor-owned electric, gas, sewer, and water utilities that serve more than 2,000 residential customers
Approximately 780 words

Overview of OPC Presentation

- Where have we been?
- Where are we now?
- Where are we going?

Where Are We Going?

- Further revise proposed rule
- Rulemaking docket
- Promulgation of final rule

Open Discussion of Revised Proposed Rule

Definition: Residential Meter

- Residential meter(s) means a device or devices, owned by a utility, used for measuring the volume of services of a customer's electric, gas, sewer, or water consumption for residential service at a single point of delivery.

Definition: Average Customer Arrearage

- Average customer arrearage means the mean average of the total of all delinquent charges, late fees, and reconnection fees per residential meter. Calculated as the sum of all delinquent charges, late fees, and reconnection fees associated with all residential meters as of midnight on the last day of the month, divided by the total number of residential meters with delinquent charges, late fees, or reconnection fees as of midnight on the last day of the month.

Data Points

- (A) the total number of residential meters as of midnight on the first calendar day of the month

Data Points

- (B) the total number of residential meters as of midnight on the last calendar day of the month

Data Points

- (C) the total number of residential meters for which there was a termination of service during the month

Data Points

- (D) the total number of residential meters for which there was a discontinuance of service, as that term is used in 20 CSR 4240-13.050(1)(A), (B), (C), and (E), during the month

Data Points

- (E) the total number of residential meters that did not receive service as of midnight on the first calendar day of the month and began receiving service before midnight on the last calendar day of the month

Data Points

- (F) the total number of residential meters for which at least one delinquent charge exists as of midnight on the last calendar day of the month

Data Points

- (G) the average customer arrearage

Data Points

- (H) the total dollar value of any monies received from the federal Low-Income Home Energy Assistance Program (“LIHEAP”) to pay for a residential meter’s delinquent charge during the month

Data Points

- (I) the total dollar value of any monies received from the Energy Crisis Intervention Program (“ECIP”) to pay for a residential meter’s delinquent charge during the month

Data Points

- (J) the total dollar value of any monies received from the federal government, pursuant to any program other than LIHEAP or ECIP, to pay for a residential meter's delinquent charge during the month

Data Points

- (K) the total number of residential meters for which payment is made for utility services under a payment plan; settlement agreement; or payment agreement, as that term is used in 20 CSR 4240-13.055(10), as of midnight on the last calendar day of the month

Data Points

- (L) the mean average billed volume of services provided for all residential meters recorded during the month in kilowatt-hours for electric services, centum cubic feet for gas services, and thousand gallons of water for sewer and water services

Subsection 3: Deficiencies

- If the commission finds that any deficiency exists in the report submitted by a utility as required by subsection (2) of this rule, the commission may direct its staff to issue a notice to the utility identifying the deficiency. Any utility that receives a notice from the commission stating that deficiencies exist in its report shall respond to that notice within twenty (20) days after the date said notice is issued and shall provide all information necessary to cure the deficiency identified in said notice in its response. Both the notice and the response shall be filed in EFIS by the staff of the commission.

Subsection 4: Publically Accessible

- Each report submitted by a utility as required under subsection (2) of this rule shall be made publicly available for access through a hyperlink found on the commission's official website's home page.

Subsection 5: Report

- The staff of the commission shall produce an *Annual Residential Customer Disconnection Report* within forty-five (45) days of the end of each calendar year that shall aggregate all of the reports submitted by all of the utilities as required under subsection (2) of this rule during the course of the previous year. This *Annual Residential Customer Disconnection Report* shall be made publicly available for access through a hyperlink found on the commission's official website's home page. All information included in the *Annual Residential Customer Disconnection Report* shall be considered public information; however, no customer-specific information shall be reported or made public.

Thank you!