

Marc Harnish, Operations Research Analyst
U.S. Energy Information Administration
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Harnish,

The Alliance for Affordable Energy is a consumer protection and advocacy nonprofit organization dedicated to securing equitable, affordable, and environmentally responsible energy policy for all Louisianans. In that spirit, we write regarding the Energy Information Agency's (EIA) request for comment issued in the Federal Register, Vol. 89, No. 119 on June 20, 2024.

As advocates for greater oversight of utilities in Louisiana, the Alliance is glad to see the EIA's proposal – as noted in the notice, there is no national data bank that captures shutoffs, disconnects, reconnections or many other actions taken by utilities against customers who fall behind on payments. While some states require these kinds of information, many do not – including Louisiana – depriving federal, state, and local regulators of crucial information. The Alliance would go so far as to argue that this data is essential for ensuring that utilities are truly acting in the best interests of ratepayers, as required by law, and not violating their obligations as regulated entities.

While there will understandably be challenges in acquiring this data due to sheer number of electricity and natural gas service providers and the wide array of regulatory and data collection approaches across states, municipalities, and territories, the Alliance strongly encourages the EIA to ensure this Residential Utility Disconnections Survey captures as much data as possible.

In determining and applying a "certain size threshold" for survey requirements, the EIA should consider that while smaller providers may not have the same resources or may serve fewer customers, they have the same obligations towards and authority over service to their customers. And indeed, without as thorough a survey as possible, it may be difficult to determine whether smaller utilities and providers are or are not an outsized source of disconnections or shutoffs.

Additionally, the Alliance suggests that the EIA consider publishing data collected through the survey in such a way as to distinguish ownership of the electricity and natural gas survey providers – in particular, allowing for separate examination of state or municipally owned utilities (where shutoff, disconnection, and reconnections policies are shaped in part by state or local government policy), not-for-profit co-operative utilities (where policies are largely set by board and management), and for-profit or investor owned entities (where those policies are shaped, at least in part, by profit motive). While the survey's results would undoubtedly still be useful without these distinctions being made, the fact of the matter is that the approach towards correcting policy problems differ meaningfully between the two models.

Thank you for your consideration.

Logan Atkinson Burke, Executive Director
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