



National  
Consumer Law  
Center

# The Need for Utility Reporting of Key Credit and Collections Data Now and After the Covid-19 Crisis

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## Introduction

The challenges posed by the Covid-19 crisis have heightened the importance of sustained, affordable access to essential home energy service for all households across the nation. Yet, there is currently only limited capacity in the U.S. to gain a clear, data-driven understanding of the number of households that lose access to home energy services and otherwise struggle with utility affordability and security. Without the data, home energy affordability challenges and their often-dire consequences remain invisible, and the effectiveness of utility credit and collections practices cannot be assessed. Further, development and implementation of effective programs and policies to address access and affordability challenges is thwarted by lack of data. There is a pressing need to step up utility collection and public reporting of data reflecting service disconnections and restorations, as well as other measures of home energy security.<sup>1</sup>

Following is a list of data points that advocates and others can obtain through information requests in regulated utility proceedings and at public meetings of municipally or cooperatively owned utilities. After initial receipt of monthly, advocates may request adoption of provisions to secure on-going, public reporting.

This document also includes citations to a sampling of data reporting protocols adopted at the state level, and to resolutions adopted by the National Association of State Utility Consumer Advocates (NASUCA) and the National Association Regulatory Utility Commissions (NARUC) calling for comprehensive utility data reporting.

## Key Data Points

Most states do not require electric or gas service providers to report the key data points needed to determine the extent to which residential customers are affordably accessing and retaining essential utility service. Understanding affordability and home energy security challenges that stem not only from utility bills, but also from credit and collection protocols, requires more than

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<sup>1</sup> "Home energy security" as used here refers to sustained, affordable access to necessary service without foregoing (1) other necessities such as food and medicine, (2) maintenance of healthy indoor temperatures, (3) lighting and refrigeration necessary for health, safety well-being, or (4) access to and operation of essential communications services.

raw service disconnection numbers. **Getting a clearer picture requires obtaining monthly data - for both general residential customers and identified low-income residential customers - at a minimum, using the following data points by zip code:**

- Number of customers,
- Dollar amount billed,
- Number of customers charged a late payment fee,
- Dollar value of late fees collected,
- Number of customers with an arrearage balance by vintage
  - 60 – 90 days
  - 90+ days,
- Dollar value of arrearages by vintage
  - 60 – 90 days
  - 90+ days
- Number of disconnection notices sent
- Number of disconnections for nonpayment
- Number of service restorations after disconnection for nonpayment
- Average duration of disconnection
- Dollar value of level of security deposits collected
- Number of security deposits collected,
- Number of new deferred payment agreements entered into
- Average repayment term of new deferred payment agreements
- Successfully completed deferred payment agreements, and
- Average repayment term of payment agreements.

## Examples of States with Existing Data Reporting Protocols

There are a few states where investor-owned utility data reporting is, while imperfect, fairly good in a relative sense. (*Most cooperative and municipal/Public Utility District utilities do not currently report any credit and collections data.*) The states cited below are among those with more comprehensive reporting protocols.

**Ohio** has one of the most detailed data reporting protocols in the country. In terms of the frequency and comprehensiveness of information collected and reported, the Ohio reporting template (PIPP Metrics Report Template) may be found [HERE](#), and presents a good model.

**California's** electric and gas investor-owned utility data reporting is also relatively comprehensive and informational. California requires electric and gas investor-owned utilities (IOUs) to report quarterly arrearages, disconnections, disconnection notices, restorations, and a range of other key data points separately for general residential customers, low-income

customers participating in a low-income efficiency or discount program, and customers receiving the "medical baseline" rate. A recent report (SCE Quarterly Disconnect Report...) may be found [HERE](#).

In **Pennsylvania**, electric and gas IOUs have long reported key credit and collections data. The Pennsylvania Utility Commission's Bureau of Consumer Services issues an annual [Universal Service Programs and Collections Performance Report](#) delineating disconnections, reconnections, deferred payment agreements and other key data points.

**Iowa** electric and gas utilities have reported on some (but not all) critical credit, collections and energy security data points since 1999. A spreadsheet ([Iowa Moratorium Report](#)) shows time-series data and charts documenting general residential and low-income customer trends over the past 20 years. The spreadsheet includes a number of calculated fields that allow for *rates* of disconnections, arrearages, and other pertinent information to be displayed, which can be more useful than looking at raw numbers alone.

Some other states have also implemented reasonable data reporting protocol, but most have not. It is no coincidence that in many of the states where there are few or no reporting requirements, there are also weak consumer protections and a lack of effective low-income energy affordability and efficiency programs. These consumer protection and programmatic deficiencies present particular threats to home energy security in light of the Covid-19 crisis.

## Utility Reaction to Requests for Data Reporting

Utilities are generally not thrilled when advocates, regulators, or policymakers propose that comprehensive credit and collections data be collected and reported. They are perhaps understandably reticent about initiating a process whereby they trumpet to the world the number of their customers they shut off every month and that their franchised service is unaffordable to some.

Invariably, when faced with a request to collect and report — either regularly on an ongoing basis, or through response to discovery requests — utilities state that their information technology systems cannot accommodate the task, the cost is too high, they don't track the requested information, or and that the request is unduly burdensome. But the fact is, utilities know which customers are behind on their bills, receive disconnection notices, have service disconnected or restored, and enter into deferred payment agreements. There are sufficient examples of successful reporting that demonstrate the potential for implementation.

## Why Zip Code Level Reporting?

Some national and regional data sets show disparities by race in disconnections and other important energy security metrics — even after controlling for income. These disparities raise profound racial justice concerns and highlight the importance of obtaining utility-specific credit and collections data at the zip code, or even census tract level. Geographically granular data is needed to flag any disparities, but also to inform targeting of effective energy efficiency and other affordable energy programming. There are currently no utilities that report regularly on a geographically granular level. But asking for and obtaining such information in regulatory proceedings, co-op meetings, or municipal utility meetings is required to ensure equity.

## Community Organizing Potential

While getting new reporting protocols in place may involve some contention at the outset, a grassroots campaign to initiate reporting can serve as an effective community organizing tool. Mobilizing around a push for the requirement that we have information about people who cannot retain access to basic service can help build organizational strength, energize people at the grassroots, and lead to real, material change in peoples' lives.

## Resolutions of National Consumer and Regulatory Agency Associations and Other Resources

It is important to note that in 2019 for the first time, NARUC and NASUCA jointly adopted a resolution on utility reporting of credit and collections data. The resolution may be found [HERE](#). This idea is becoming mainstream.

## Conclusion

Getting good data is an essential first step in grappling both with energy security challenges in the short term and helping ensure sustained security in the long term.

The National Consumer Law Center (NCLC) can help state and local advocates and community organizations to develop data collection and reporting campaigns both inside and outside of the regulatory commission's hearing room. For more information, please contact NCLC Senior Energy Analyst John Howat at [jhowat@nclc.org](mailto:jhowat@nclc.org).