National Consumer Law Center

Skyrocketing Utility Arrears during the Covid-19 Crisis: The Need for Substantial Federal Support

April 2020

Residential utility customer arrearages will likely skyrocket amidst plummeting income and employment loss during the Covid-19 crisis. How big will the problem be?

The answer depends on just how many customers will be unable to keep up with payments in the weeks to come. The tables that follow depict disparate home electricity burdens and expenditures, and a range of state and national residential electric utility arrearage scenarios. They draw on customer and revenue data from the U.S. Energy Information Administration (EIA), poverty data from the U.S. Census Bureau, and burden data calculated using EIA Residential Energy Consumption Survey microdata.

Table 1.1 and 1.2 illustrate at the state and national levels residential customer electricity revenues and highlights electricity burden (the proportion of household income devoted to electricity service) and poverty disparities among the states that are likely to have bearing on arrearage scenarios going forward. For example, home electricity burdens and poverty rates in Alabama are both very high, increasing the likelihood that a more severe arrearage scenario unfolds, particularly in the event of a protracted economic downturn. However, even in states that recently have experienced relatively moderate poverty rates and burden levels, a protracted crisis will eventually bring elevated arrearages and affect large numbers of residential utility customers.

Table 1.1: State and D.C. Residential Electric Utility Sales, Revenues, and Customers

State	2018 Retail Sales (kWh x 1,000,000)	2018 Revenue from Sales ($ x 1,000,000)	2018 Daily Revenue from Sales ($ x 1,000,000)	2018 Number of Residential Customers	2018 Residential Price per kWh		2018 Usage per Residential Customer (kWh)		2018 Electricity Expenditure per Customer	
					Price	Rank	Usage	Rank	Expenditure	Rank
AL	33,080	4,028	11	2,229,470	$0.1218	25	14,838	48	$1,807	49
AK	1,975	433	1	287,523	$0.2192	50	6,869	5	$1,506	36
AZ	34,660	4,425	12	2,808,351	$0.1277	33	12,342	34	$1,576	42
AR	19,259	1,889	5	1,388,359	$0.0981	3	13,872	43	$1,361	22
CA	89,100	16,782	46	13,591,149	$0.1884	45	6,556	2	$1,235	14
CO	19,287	2,343	6	2,326,974	$0.1215	24	8,288	13	$1,007	3
CT	13,061	2,769	8	1,503,701	$0.2120	48	8,686	15	$1,841	50
DE	5,070	635	2	432,449	$0.1252	29	11,724	30	$1,468	30

Table 1.1: State and D.C. Residential Electric Utility Sales, Revenues, and Customers (cont.)

State	2018 Retail Sales (kWh x 1,000,000)	2018 Revenue from Sales ($ x 1,000,000)	2018 Daily Revenue from Sales ($ x 1,000,000)	2018 Number of Residential Customers	2018 Residential Price per kWh		2018 Usage per Residential Customer (kWh)		2018 Electricity Expenditure per Customer	
					Price	Rank	Usage	Rank	Expenditure	Rank
DC	2,592	333	1	274,613	$0.1285	34	9,439	19	$1,213	13
FL	125,528	14,485	40	9,423,019	$0.1154	20	13,321	36	$1,537	39
GA	59,689	6,847	19	4,354,020	$0.1147	19	13,709	42	$1,573	40
HI	2,711	880	2	436,266	$0.3246	51	6,214	1	$2,017	51
ID	8,428	855	2	743,564	$0.1014	4	11,335	27	$1,150	8
IL	47,226	6,029	17	5,289,571	$0.1277	32	8,928	17	$1,140	7
IN	34,575	4,240	12	2,863,350	$0.1226	27	12,075	32	$1,481	32
IA	14,840	1,817	5	1,385,752	$0.1224	26	10,709	23	$1,311	19
KS	14,187	1,894	5	1,266,041	$0.1335	37	11,206	26	$1,496	34
KY	27,713	2,936	8	1,980,206	$0.1059	8	13,995	46	$1,483	33
LA	32,066	3,074	8	2,085,054	$0.0959	1	15,379	50	$1,474	31
ME	4,872	821	2	709,849	$0.1685	42	6,863	4	$1,157	9
MD	28,138	3,742	10	2,332,516	$0.1330	36	12,063	31	$1,604	44
MA	20,285	4,383	12	2,784,243	$0.2161	49	7,286	8	$1,574	41
MI	35,131	5,427	15	4,365,526	$0.1545	41	8,047	11	$1,243	16
MN	22,837	3,001	8	2,420,321	$0.1314	35	9,436	18	$1,240	15
MS	19,311	2,147	6	1,290,280	$0.1112	14	14,967	49	$1,664	47
MO	37,463	4,249	12	2,792,451	$0.1134	18	13,416	37	$1,522	38
MT	5,198	570	2	509,527	$0.1097	11	10,202	21	$1,119	4
NE	10,412	1,114	3	849,891	$0.1070	9	12,251	33	$1,311	18
NV	13,450	1,593	4	1,183,659	$0.1184	23	11,363	28	$1,346	21
NH	4,641	914	3	622,670	$0.1969	46	7,453	9	$1,468	29
NJ	29,531	4,550	12	3,568,043	$0.1541	40	8,277	12	$1,275	17

Table 1.1: State and D.C. Residential Electric Utility Sales, Revenues, and Customers (cont.)

State	2018 Retail Sales (kWh x 1,000,000)	2018 Revenue from Sales ($ x 1,000,000)	2018 Daily Revenue from Sales ($ x 1,000,000)	2018 Number of Residential Customers	2018 Residential Price per kWh		2018 Usage per Residential Customer (kWh)		2018 Electricity Expenditure per Customer	
					Price	Rank	Usage	Rank	Expenditure	Rank
NM	6,826	866	2	889,838	$0.1269	31	7,671	10	$973	2
NY	52,153	9,659	26	7,190,903	$0.1852	44	7,253	7	$1,343	20
NC	61,622	6,835	19	4,550,417	$0.1109	13	13,542	39	$1,502	35
ND	5,133	526	1	382,592	$0.1025	5	13,416	38	$1,375	23
OH	54,452	6,840	19	4,964,849	$0.1256	30	10,968	25	$1,378	24
OK	24,117	2,484	7	1,764,979	$0.1030	6	13,664	41	$1,407	25
OR	18,931	2,079	6	1,750,239	$0.1098	12	10,816	24	$1,188	11
PA	55,896	7,765	21	5,390,427	$0.1389	38	10,369	22	$1,441	26
RI	3,124	642	2	442,006	$0.2055	47	7,068	6	$1,452	27
SC	31,852	3,963	11	2,290,200	$0.1244	28	13,908	44	$1,730	48
SD	5,018	582	2	400,147	$0.1160	21	12,540	35	$1,454	28
TN	44,382	4,752	13	2,882,983	$0.1071	10	15,394	51	$1,648	46
TX	157,268	17,610	48	11,148,781	$0.1120	16	14,106	47	$1,580	43
UT	9,715	1,011	3	1,091,159	$0.1041	7	8,903	16	$927	1
VT	2,116	381	1	315,137	$0.1801	43	6,715	3	$1,209	12
VA	47,963	5,624	15	3,431,575	$0.1173	22	13,977	45	$1,639	45
WA	35,339	3,446	9	3,076,868	$0.0975	2	11,485	29	$1,120	5
WV	11,679	1,306	4	859,039	$0.1118	15	13,595	40	$1,520	37
WI	22,445	3,147	9	2,700,651	$0.1402	39	8,311	14	$1,165	10
WY	2,748	310	1	272,429	$0.1128	17	10,087	20	$1,138	6
U.S. *Totals* and Weighted Avgs.	***1,469,095***	***189,033***	***518***	***133,893,627***	$0.1359		10,972		1,412	

Sources: Calculated from U.S. Energy Information Administration Form 861 and U.S. Census Bureau Current Population Survey

Table 1.2: State and D.C. Poverty and Residential Electric Utility Energy Burdens

State	2018 Population Less Than or Equal to 150% Federal Poverty Guidelines (FPG)			2018 Population Less Than or Equal to 75% Federal Poverty Guidelines (FPG)			Home Electricity Burden (2-person household) by Selected Income Levels			
	Number	Percent	Rank	Number	Percent	Rank	$75,000/yr	150% FPG	75% FPG	Rank
AL	1,176,702	24.4%	44	505,966	10.5%	44	2.4%	7.3%	14.6%	49
AK	159,619	22.3%	38	69,498	9.7%	37	2.0%	6.1%	12.2%	36
AZ	1,499,870	21.4%	32	636,984	9.1%	32	2.1%	6.4%	12.8%	42
AR	769,850	26.4%	47	303,362	10.4%	43	1.8%	5.5%	11.0%	22
CA	8,630,239	22.1%	36	3,243,243	8.3%	26	1.6%	5.0%	10.0%	14
CO	927,871	16.8%	11	310,796	5.6%	3	1.3%	4.1%	8.2%	3
CT	594,277	16.7%	8	276,667	7.8%	22	2.5%	7.5%	14.9%	50
DE	166,364	17.3%	12	71,352	7.4%	16	2.0%	5.9%	11.9%	30
DC	149,215	21.6%	33	72,730	10.5%	45	1.6%	4.9%	9.8%	13
FL	4,750,277	22.7%	40	2,026,253	9.7%	38	2.0%	6.2%	12.5%	39
GA	2,508,040	24.5%	45	982,450	9.6%	36	2.1%	6.4%	12.7%	40
HI	248,801	17.8%	15	97,670	7.0%	11	2.7%	8.2%	16.3%	51
ID	336,035	19.4%	22	130,565	7.6%	20	1.5%	4.7%	9.3%	8
IL	2,235,029	17.7%	13	971,362	7.7%	21	1.5%	4.6%	9.2%	7
IN	1,247,275	19.0%	20	579,868	8.8%	29	2.0%	6.0%	12.0%	32
IA	480,350	15.8%	5	187,688	6.2%	5	1.7%	5.3%	10.6%	19
KS	626,658	21.9%	34	286,744	10.0%	41	2.0%	6.1%	12.1%	34
KY	1,028,208	23.4%	41	399,428	9.1%	33	2.0%	6.0%	12.0%	33
LA	1,444,551	31.9%	51	675,376	14.9%	51	2.0%	6.0%	11.9%	31
ME	273,509	20.8%	30	98,151	7.5%	18	1.5%	4.7%	9.4%	9
MD	891,200	14.9%	2	334,755	5.6%	4	2.1%	6.5%	13.0%	44
MA	1,136,926	16.7%	10	487,243	7.1%	12	2.1%	6.4%	12.8%	41
MI	2,034,765	20.5%	28	924,971	9.3%	35	1.7%	5.0%	10.1%	16
MN	884,575	15.7%	4	378,159	6.7%	9	1.7%	5.0%	10.0%	15

Table 1.2: State and D.C. Poverty and Residential Electric Utility Energy Burdens (cont.)

State	2018 Population Less Than or Equal to 150% Federal Poverty Guidelines (FPG)			2018 Population Less Than or Equal to 75% Federal Poverty Guidelines (FPG)			Home Electricity Burden (2-person household) by Selected Income Levels			
	Number	Percent	Rank	Number	Percent	Rank	$75,000/yr	150% FPG	75% FPG	Rank
MS	895,062	30.3%	49	387,176	13.1%	49	2.2%	6.7%	13.5%	47
MO	1,183,206	19.7%	25	434,544	7.2%	13	2.0%	6.2%	12.3%	38
MT	184,523	17.7%	14	69,979	6.7%	10	1.5%	4.5%	9.1%	4
NE	353,361	18.9%	19	148,321	7.9%	23	1.7%	5.3%	10.6%	18
NV	669,137	22.4%	39	303,542	10.2%	42	1.8%	5.5%	10.9%	21
NH	179,048	13.4%	1	51,400	3.9%	1	2.0%	5.9%	11.9%	29
NJ	1,499,111	16.6%	7	555,308	6.2%	6	1.7%	5.2%	10.3%	17
NM	623,735	30.5%	50	275,362	13.5%	50	1.3%	3.9%	7.9%	2
NY	4,347,833	22.0%	35	1,739,172	8.8%	30	1.8%	5.4%	10.9%	20
NC	2,586,835	25.2%	46	1,138,310	11.1%	46	2.0%	6.1%	12.2%	35
ND	134,488	18.1%	17	64,820	8.7%	28	1.8%	5.6%	11.1%	23
OH	2,364,838	20.5%	29	1,050,071	9.1%	34	1.8%	5.6%	11.2%	24
OK	849,216	22.2%	37	336,515	8.8%	31	1.9%	5.7%	11.4%	25
OR	848,192	20.2%	26	310,216	7.4%	15	1.6%	4.8%	9.6%	11
PA	2,319,020	18.5%	18	1,063,073	8.5%	27	1.9%	5.8%	11.7%	26
RI	200,438	19.4%	23	100,458	9.7%	39	1.9%	5.9%	11.8%	27
SC	1,194,728	24.1%	43	557,190	11.3%	48	2.3%	7.0%	14.0%	48
SD	164,988	19.0%	21	68,746	7.9%	24	1.9%	5.9%	11.8%	28
TN	1,356,193	20.3%	27	539,750	8.1%	25	2.2%	6.7%	13.4%	46
TX	6,592,118	23.4%	42	2,727,333	9.7%	40	2.1%	6.4%	12.8%	43
UT	483,104	15.4%	3	170,882	5.5%	2	1.2%	3.8%	7.5%	1
VT	119,259	19.5%	24	40,602	6.6%	8	1.6%	4.9%	9.8%	12
VA	1,463,012	17.8%	16	609,467	7.4%	17	2.2%	6.6%	13.3%	45
WA	1,239,761	16.7%	9	532,464	7.2%	14	1.5%	4.5%	9.1%	5

Table 1.2: State and D.C. Poverty and Residential Electric Utility Energy Burdens (cont.)

State	2018 Population Less Than or Equal to 150% Federal Poverty Guidelines (FPG)			2018 Population Less Than or Equal to 75% Federal Poverty Guidelines (FPG)			Home Electricity Burden (2-person household) by Selected Income Levels			
	Number	Percent	Rank	Number	Percent	Rank	$75,000/yr	150% FPG	75% FPG	Rank
WV	495,524	27.6%	48	203,663	11.3%	47	2.0%	6.2%	12.3%	37
WI	932,920	16.0%	6	365,955	6.3%	7	1.6%	4.7%	9.4%	10
WY	118,908	21.2%	31	42,009	7.5%	19	1.5%	4.6%	9.2%	6
U.S. *Totals* and Weighted Avgs.	***67,598,764***	***21.0%***		***27,937,608***	***8.7%***		**1.9%**	**5.7%**	**11.4%**	

Sources: Calculated from U.S. Energy Information Administration Form 861 and U.S. Census Bureau Current Population Survey

Tables 2.1 and 2.2 provide estimates of the number of residential electric utility customers in arrears during the crisis and the dollar value of arrears under a range of scenarios. The depicted scenarios range from very optimistic (20% of residential customers with a 60-day arrearage balance) to more realistic (40% of residential customers with a 90-day arrearage balance). Given recent experience, a 40% serious arrearage rate in the event of protracted economic slow-down is plausible. In Iowa, for example, 42% of residential utility customers participating in energy assistance programs had past-due accounts in December, 2019. Further, according to the St. Louis Federal Reserve, 46% of U.S. jobs at high risk of layoff. If the Covid-19 crisis persists and unemployment claims continue to rise, the proportion of residential utility customers income-eligible to participate in such programs will also rise dramatically, as will the dollar value of unpaid accounts.

Under the most optimistic scenario depicted, nearly 27 million residential electric utility customers will carry a 60-day balance and the dollar value of those past due accounts will exceed $6 billion. However, if a 30%/90-day-late scenario unfolds, over 40 million customers will be involved, and the total past due balance will approach $14 billion. Under a protracted crisis scenario with 40% of residential electric utility customers having fallen behind 90-days on their electric bill payments, nearly 54 million customers will have accrued a total arrearage balance approaching $19 billion.

Table 2.1: State and D.C. Residential Electric Utility Arrearage Scenarios (Percent of Customers in Arrears and Days Past Due)

State	20 Percent	60 Days	30 Percent	60 Days	20 Percent	90 Days
	Number of Customers	Total $ of Arrears	Number of Customers	Total $ of Arrears	Number of Customers	Total $ of Arrears
AL	445,894	$132,427,397	668,841	$198,641,096	445,894	$198,641,096
AK	57,505	$14,235,616	86,257	$21,353,425	57,505	$21,353,425
AZ	561,670	$145,479,452	842,505	$218,219,178	561,670	$218,219,178
AR	277,672	$62,104,110	416,508	$93,156,164	277,672	$93,156,164
CA	2,718,230	$551,736,986	4,077,345	$827,605,479	2,718,230	$827,605,479
CO	465,395	$77,030,137	698,092	$115,545,205	465,395	$115,545,205
CT	300,740	$91,035,616	451,110	$136,553,425	300,740	$136,553,425
DE	86,490	$20,876,712	129,735	$31,315,068	86,490	$31,315,068
DC	54,923	$10,947,945	82,384	$16,421,918	54,923	$16,421,918
FL	1,884,604	$476,219,178	2,826,906	$714,328,767	1,884,604	$714,328,767
GA	870,804	$225,106,849	1,306,206	$337,660,274	870,804	$337,660,274
HI	87,253	$28,931,507	130,880	$43,397,260	87,253	$43,397,260
ID	148,713	$28,109,589	223,069	$42,164,384	148,713	$42,164,384
IL	1,057,914	$198,213,699	1,586,871	$297,320,548	1,057,914	$297,320,548
IN	572,670	$139,397,260	859,005	$209,095,890	572,670	$209,095,890
IA	277,150	$59,736,986	415,726	$89,605,479	277,150	$89,605,479
KS	253,208	$62,268,493	379,812	$93,402,740	253,208	$93,402,740
KY	396,041	$96,526,027	594,062	$144,789,041	396,041	$144,789,041
LA	417,011	$101,063,014	625,516	$151,594,521	417,011	$151,594,521
ME	141,970	$26,991,781	212,955	$40,487,671	141,970	$40,487,671
MD	466,503	$123,024,658	699,755	$184,536,986	466,503	$184,536,986
MA	556,849	$144,098,630	835,273	$216,147,945	556,849	$216,147,945
MI	873,105	$178,421,918	1,309,658	$267,632,877	873,105	$267,632,877
MN	484,064	$98,663,014	726,096	$147,994,521	484,064	$147,994,521

Table 2.1: State and D.C. Residential Electric Utility Arrearage Scenarios (Percent of Customers in Arrears and Days Past Due) (cont.)

State	20 Percent	60 Days	30 Percent	60 Days	20 Percent	90 Days
	Number of Customers	Total $ of Arrears	Number of Customers	Total $ of Arrears	Number of Customers	Total $ of Arrears
MS	258,056	$70,586,301	387,084	$105,879,452	258,056	$105,879,452
MO	558,490	$139,693,151	837,735	$209,539,726	558,490	$209,539,726
MT	101,905	$18,739,726	152,858	$28,109,589	101,905	$28,109,589
NE	169,978	$36,624,658	254,967	$54,936,986	169,978	$54,936,986
NV	236,732	$52,372,603	355,098	$78,558,904	236,732	$78,558,904
NH	124,534	$30,049,315	186,801	$45,073,973	124,534	$45,073,973
NJ	713,609	$149,589,041	1,070,413	$224,383,562	713,609	$224,383,562
NM	177,968	$28,471,233	266,951	$42,706,849	177,968	$42,706,849
NY	1,438,181	$317,556,164	2,157,271	$476,334,247	1,438,181	$476,334,247
NC	910,083	$224,712,329	1,365,125	$337,068,493	910,083	$337,068,493
ND	76,518	$17,293,151	114,778	$25,939,726	76,518	$25,939,726
OH	992,970	$224,876,712	1,489,455	$337,315,068	992,970	$337,315,068
OK	352,996	$81,665,753	529,494	$122,498,630	352,996	$122,498,630
OR	350,048	$68,350,685	525,072	$102,526,027	350,048	$102,526,027
PA	1,078,085	$255,287,671	1,617,128	$382,931,507	1,078,085	$382,931,507
RI	88,401	$21,106,849	132,602	$31,660,274	88,401	$31,660,274
SC	458,040	$130,290,411	687,060	$195,435,616	458,040	$195,435,616
SD	80,029	$19,134,247	120,044	$28,701,370	80,029	$28,701,370
TN	576,597	$156,230,137	864,895	$234,345,205	576,597	$234,345,205
TX	2,229,756	$578,958,904	3,344,634	$868,438,356	2,229,756	$868,438,356
UT	218,232	$33,238,356	327,348	$49,857,534	218,232	$49,857,534
VT	63,027	$12,526,027	94,541	$18,789,041	63,027	$18,789,041
VA	686,315	$184,898,630	1,029,473	$277,347,945	686,315	$277,347,945
WA	615,374	$113,293,151	923,060	$169,939,726	615,374	$169,939,726

Table 2.1: State and D.C. Residential Electric Utility Arrearage Scenarios (Percent of Customers in Arrears and Days Past Due) (cont.)

State	20 Percent	60 Days	30 Percent	60 Days	20 Percent	90 Days
	Number of Customers	Total $ of Arrears	Number of Customers	Total $ of Arrears	Number of Customers	Total $ of Arrears
WV	171,808	$42,936,986	257,712	$64,405,479	171,808	$64,405,479
WI	540,130	$103,463,014	810,195	$155,194,521	540,130	$155,194,521
WY	54,486	$10,191,781	81,729	$15,287,671	54,486	$15,287,671
U.S. Totals	***26,778,725***	***$6,214,783,562***	***40,168,088***	***$9,322,175,342***	***26,778,725***	***$9,322,175,342***

Source: Calculated from U.S. Energy Information Administration Form 861

Table 2.2: State and D.C. Residential Electric Utility Arrearage Scenarios (Percent of Customers in Arrears and Days Past Due)

State	30 Percent	90 Days	40 Percent	60 Days	40 Percent	90 Days
	Number of Customers	Total $ of Arrears	Number of Customers	Total $ of Arrears	Number of Customers	Total $ of Arrears
AL	668,841	$297,961,644	891,788	$264,854,795	891,788	$397,282,192
AK	86,257	$32,030,137	115,009	$28,471,233	115,009	$42,706,849
AZ	842,505	$327,328,767	1,123,340	$290,958,904	1,123,340	$436,438,356
AR	416,508	$139,734,247	555,344	$124,208,219	555,344	$186,312,329
CA	4,077,345	$1,241,408,219	5,436,460	$1,103,473,973	5,436,460	$1,655,210,959
CO	698,092	$173,317,808	930,790	$154,060,274	930,790	$231,090,411
CT	451,110	$204,830,137	601,480	$182,071,233	601,480	$273,106,849
DE	129,735	$46,972,603	172,980	$41,753,425	172,980	$62,630,137
DC	82,384	$24,632,877	109,845	$21,895,890	109,845	$32,843,836
FL	2,826,906	$1,071,493,151	3,769,208	$952,438,356	3,769,208	$1,428,657,534

Table 2.2: State and D.C. Residential Electric Utility Arrearage Scenarios (Percent of Customers in Arrears and Days Past Due) (cont.)

State	30 Percent	90 Days	40 Percent	60 Days	40 Percent	90 Days
	Number of Customers	Total $ of Arrears	Number of Customers	Total $ of Arrears	Number of Customers	Total $ of Arrears
GA	1,306,206	$506,490,411	1,741,608	$450,213,699	1,741,608	$675,320,548
HI	130,880	$65,095,890	174,506	$57,863,014	174,506	$86,794,521
ID	223,069	$63,246,575	297,426	$56,219,178	297,426	$84,328,767
IL	1,586,871	$445,980,822	2,115,828	$396,427,397	2,115,828	$594,641,096
IN	859,005	$313,643,836	1,145,340	$278,794,521	1,145,340	$418,191,781
IA	415,726	$134,408,219	554,301	$119,473,973	554,301	$179,210,959
KS	379,812	$140,104,110	506,416	$124,536,986	506,416	$186,805,479
KY	594,062	$217,183,562	792,082	$193,052,055	792,082	$289,578,082
LA	625,516	$227,391,781	834,022	$202,126,027	834,022	$303,189,041
ME	212,955	$60,731,507	283,940	$53,983,562	283,940	$80,975,342
MD	699,755	$276,805,479	933,006	$246,049,315	933,006	$369,073,973
MA	835,273	$324,221,918	1,113,697	$288,197,260	1,113,697	$432,295,890
MI	1,309,658	$401,449,315	1,746,210	$356,843,836	1,746,210	$535,265,753
MN	726,096	$221,991,781	968,128	$197,326,027	968,128	$295,989,041
MS	387,084	$158,819,178	516,112	$141,172,603	516,112	$211,758,904
MO	837,735	$314,309,589	1,116,980	$279,386,301	1,116,980	$419,079,452
MT	152,858	$42,164,384	203,811	$37,479,452	203,811	$56,219,178
NE	254,967	$82,405,479	339,956	$73,249,315	339,956	$109,873,973
NV	355,098	$117,838,356	473,464	$104,745,205	473,464	$157,117,808
NH	186,801	$67,610,959	249,068	$60,098,630	249,068	$90,147,945
NJ	1,070,413	$336,575,342	1,427,217	$299,178,082	1,427,217	$448,767,123
NM	266,951	$64,060,274	355,935	$56,942,466	355,935	$85,413,699
NY	2,157,271	$714,501,370	2,876,361	$635,112,329	2,876,361	$952,668,493
NC	1,365,125	$505,602,740	1,820,167	$449,424,658	1,820,167	$674,136,986

Table 2.2: State and D.C. Residential Electric Utility Arrearage Scenarios (Percent of Customers in Arrears and Days Past Due) (cont.)

State	30 Percent	90 Days	40 Percent	60 Days	40 Percent	90 Days
	Number of Customers	Total $ of Arrears	Number of Customers	Total $ of Arrears	Number of Customers	Total $ of Arrears
ND	114,778	$38,909,589	153,037	$34,586,301	153,037	$51,879,452
OH	1,489,455	$505,972,603	1,985,940	$449,753,425	1,985,940	$674,630,137
OK	529,494	$183,747,945	705,992	$163,331,507	705,992	$244,997,260
OR	525,072	$153,789,041	700,096	$136,701,370	700,096	$205,052,055
PA	1,617,128	$574,397,260	2,156,171	$510,575,342	2,156,171	$765,863,014
RI	132,602	$47,490,411	176,802	$42,213,699	176,802	$63,320,548
SC	687,060	$293,153,425	916,080	$260,580,822	916,080	$390,871,233
SD	120,044	$43,052,055	160,059	$38,268,493	160,059	$57,402,740
TN	864,895	$351,517,808	1,153,193	$312,460,274	1,153,193	$468,690,411
TX	3,344,634	$1,302,657,534	4,459,512	$1,157,917,808	4,459,512	$1,736,876,712
UT	327,348	$74,786,301	436,464	$66,476,712	436,464	$99,715,068
VT	94,541	$28,183,562	126,055	$25,052,055	126,055	$37,578,082
VA	1,029,473	$416,021,918	1,372,630	$369,797,260	1,372,630	$554,695,890
WA	923,060	$254,909,589	1,230,747	$226,586,301	1,230,747	$339,879,452
WV	257,712	$96,608,219	343,616	$85,873,973	343,616	$128,810,959
WI	810,195	$232,791,781	1,080,260	$206,926,027	1,080,260	$310,389,041
WY	81,729	$22,931,507	108,972	$20,383,562	108,972	$30,575,342
U.S. Totals	***40,168,088***	***$13,983,263,014***	***53,557,451***	***$12,429,567,123***	***53,557,451***	***$18,644,350,685***

Source: Calculated from U.S. Energy Information Administration Form 861

These scenarios only include residential electricity service customers. They do not include commercial or industrial accounts, nor do they reflect back bills for natural gas, water, or telecommunication services. In short, retention of basic energy and utility services that are absolutely essential to health and safety will present tremendous challenges for customers and utility service delivery entities across the country if the crisis persists.

Substantial, unprecedented federal support will be required to ensure health and safety in the event that the crisis, and related economic decline, continue into the future. However, such substantial support should be tied to utility adoption of specific programmatic and consumer protection protocols that ensure continuous access to service necessary to health, safety and well-being of all customers struggling financially. Utility receipt of federal support should be contingent upon the following:

- Halt disconnections for non-payment during the Covid-19 crisis,
- Reconnect customers who were previously disconnected due to inability to pay,
- Eliminate collection of security deposits and late payment fees,
- Eliminate down payment requirements on deferred payment arrangements,
- Provide flexible, deferred payment agreements that are based on customers' income and expense circumstances,
- Eliminate minimum balance requirements for prepaid utility service customers, and
- Require utilities to write off debt for consumers who certify that they are income-eligible to participate in the Low Income Home Energy Assistance Program.

In conclusion, residential utility arrearages are likely to spike during the Covid-19 crisis. Due to rising unemployment and other economic challenges, large numbers of customers previously able to remain current on utility bill payments will fall behind. Absent enhanced affordability programming and consumer protection measures, increasing arrearages will threaten health, safety and access to necessary home energy and utility services. Increased federal support – tied to enhanced consumer protection programs and policies -- is required to ensure home energy security during the crisis.

For more information or questions, please contact National Consumer Law Center Senior Energy Analyst John Howat (jhowat@nclc.org).