

*"Service Disconnection Reporting Requirements for
Electric, Gas, Water, and Sewer (but probably not Steam
Heating) Utilities"*

A Virtual Rulemaking Workshop

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Goals Today

- Remind us why we are here
- Remind us what the problem is
- Elicit dialogue and constructive feedback
- Collective “sensemaking” moving forward
- Reset the data
- No fault, no blame*
- Prelude to a potential Chapter 13 reboot

2019 NARUC Resolution

11/19/2019

Resolution on Best Practices in Data Collection and Reporting for Utility Services Delinquencies in Payments and Disconnections of Service

- **Highlights include:**
- *Whereas* households with annual incomes at or below \$30,000 have “energy burdens” two to four times as large as households that make in excess of \$30,000
- *Whereas* funding to assist lower-income households pay their energy bills is insufficient to meet the need, with funding available from the federal Low Income Home Energy Assistance Program (“LIHEAP”) able to assist only about 6.1 million or about one-fifth of eligible households, with an average annual grant of \$458, during federal fiscal year 2018

- *Whereas* low-income households often postpone other important purchases, even in some cases going without food, or foregoing medical or dental care, in order to pay utility bills, or suffer illness in an effort to lower those bills by reducing their usage of heating and cooling energy to what can be unhealthy levels;
- *Whereas* NARUC and NASUCA recognize the value of evidence-based policy making to improve outcomes for both utilities and customers; *and*
- *Whereas* data collection and sharing plays an integral role in providing information for developing evidence-based policies; *now therefore be it*
- *Resolved* that the National Association of Regulatory Utility Commissioners, convened at its Annual Meeting in San Antonio, Texas encourages all interested parties to study and consider implementing best practices to help reduce the incidence of and minimize the negative impacts on utility services payment delinquencies and disconnections and take into consideration and explore the following actions:

- work to standardize the terms used to discuss delinquencies and disconnections and definitions of those terms including, at a minimum, the terms: disconnection; reconnection; displacement (meaning a customer once disconnected who does not ever reconnect to service at the same address); vulnerable customers; and critical medical needs customers;
- work to standardize the data collected, insofar as that is practicable, in order to facilitate State comparisons and track progress towards reducing these problems;
- describe and implement best practices related to data collection regarding delinquencies and disconnections;
- seek input regularly from consumers, and the agencies and organizations that work with consumers, so that utility companies and regulators continue to be apprised of evolving customer needs and preferences;

- consider implementing quality audits and data-governance practices to ensure the information collected and reported is valid and reliable;
- to the extent permissible under federal and State laws, collect and share data for research purposes, while ensuring privacy of personally identifiable information;
- work to identify and share best practices that demonstrate promise to reduce delinquencies and disconnections, with the explicit goal of increasing customers capabilities to pay utility bills over time including best practices that identify and highlight access to helpful programs and services, including bill affordability programs such as discount rates or percentage of income payment plans, energy efficiency programs and services, weatherization, consumer education, expanding existing shutoff protections, custom payment plans that reflect the ability of the customer to successfully complete the payment plan, and flexible bill due dates;

- train employees of utilities and service agencies to assess and work with customers on sustainable solutions to avoid arrearages and maintain utility services;
- work with all stakeholders, including utility companies, to collect and share data on arrearages and disconnections;
- share information about best practices with all interested parties; and,
- work on continuous improvements in policies and programs designed to help reduce delinquencies and disconnections; *and be it further*

Resolved that States should consider requiring utilities to:

- (1) collect monthly data that tracks uncollectibles, number of payment arrangements, number of payment arrangement defaults, number of revised payment arrangements, disconnections, reconnections, duration and frequency of disconnections, and other relevant data points;
- (2) make the data publicly available on a monthly basis, delineated by general residential customers and those receiving low-income assistance; and
- (3) file the data with State public utility commissions to be published on the public utility commission's website so that policy makers might have access to sufficient, objective and granular data for forming public policy aimed at protecting the public health, safety and welfare.

AW-2020-0148

**Motion to Open a Working Group Docket Regarding a Proposed
Residential Customer Disconnection Data Reporting Rule**

11/25/2019

4 Questions were asked of us

1. Do utilities report the number of involuntary disconnects?
2. Is that information publicly available?
3. Have the number of disconnects reported by the utilities changed over time?
4. And if yes, how have they changed?

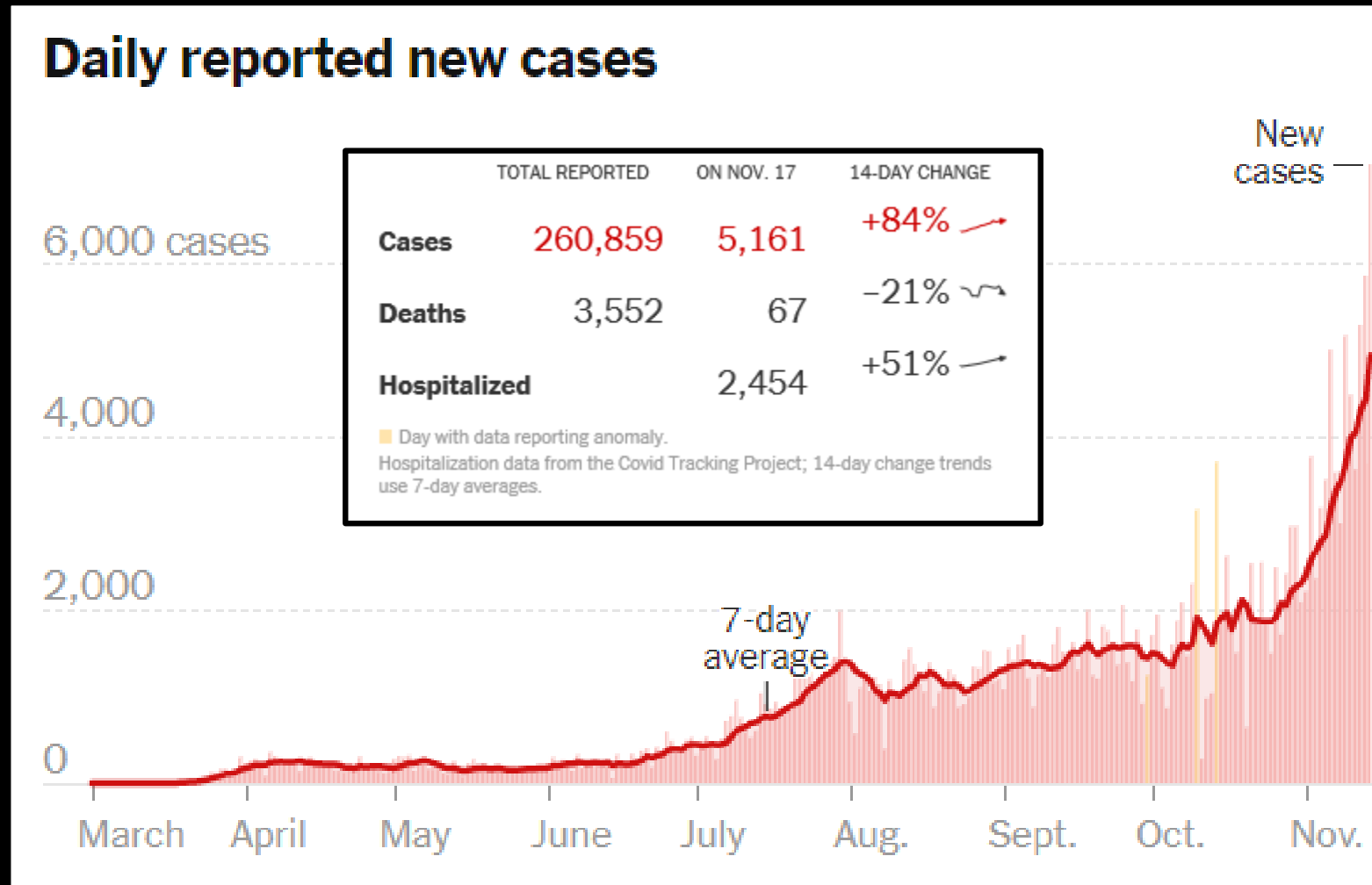
OPC concluded

- We have two periodic filings with the Commission (Annual Reports and the monthly Cold Weather Rule Reports);
- Information is not easily accessible to the public, and in some cases, has been designated confidential;
- Disconnection patterns vary considerably depending on the filing, year, utility-type, and company; and
- Based on the consolidated filings there does not appear to be an agreed-to standardization of data.
- We couldn't answer the questions...

Again, why standardized data is important

- Quality, accessible, timely and reliable data is needed to help with the measurement of sound utility performance.
- Without agreed to standardizations, widely different conclusions can be drawn, and inappropriate policy responses may arise.
- If data is merely collected and never analyzed, compared, or easily accessed it loses its value.
- The past nine months underscores the importance of accurately conveying data on the status of customer accounts.

What happened between November 2019 and now?



COVID-19 Case Pace and Utility Disconnection Moratorium covidexiststrategy.org

History of cases in Missouri

Close

Cases per million
Trend

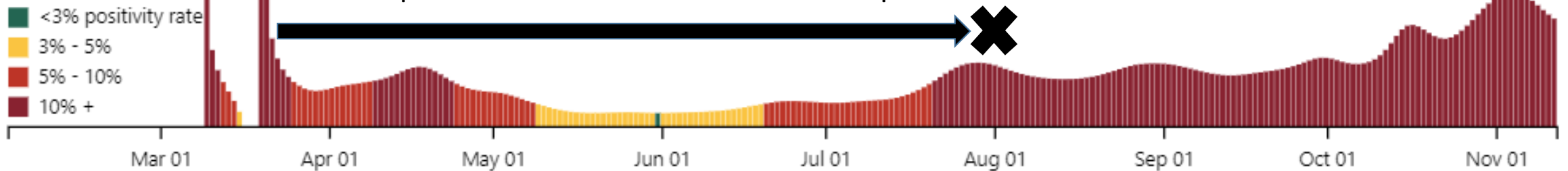
- Dark red: If cases are **increasing** (>25% change) during the 14 day period
- Red: If cases are **increasing** (between 5% - 25% change) during the 14 day period
- Yellow: If cases are **flat** (less than 5% change) during the 14 day period
- Green: If cases are **decreasing** (more than -5% change) during the 14 day period

410 cases

0 cases

<3% positivity rate
3% - 5%
5% - 10%
10% +

Self-Imposed Disconnection Moratorium in place



Uncontrolled
Spread

Trending
Poorly

Caution
Warranted

Trending
Better

The Data

2009 to 2019

Annual Reports and Monthly Cold Weather Rules

Sensemaking of the data

- What is going on here?
- Audience Participation is welcomed

Cold Weather Rule 2019 Breakdown

Cold Weather Rule Electric (just residential accounts)					
			Residential Accounts	2019 CWR	%
Ameren MO			1,068,394	280,507	26%
Empire			148,031	30,779	21%
Evergy Metro			257,925	2,534	0.98%
Evergy West			288,713	1,725	0.60%
Cold Weather Rule Gas (just residential accounts)					
			Residential Accounts	2019 CWR	%
Ameren MO			119,500	14,269	12%
Empire			38,019	7,584	20%
Liberty			45,685	4,446	10%
Summit			15,548	1,027	7%
Spire			1,106,225	75,000	7%

Annual Report Involuntary Disconnections

Involuntary Disconnects Electric (total accounts)					
			Total Accounts	2019 Annual	%
Ameren MO			1,233,191	9,093	0.74%
Empire			175,512	5,108	3%
Evergy Metro			291,625	24,688	8%
Evergy West			328,464	17,163	5%

Involuntary Disconnects Gas (total accounts)					
			Total Accounts	2019 Annual	%
Ameren MO			133,235	570	0.43%
Empire			43,564	1,633	3.75%
Liberty			52,589	2,043	3.88%
Summit			18,964	0	0.00%
Spire			1,186,236	63,504	5.35%

Annual Report Voluntary Disconnections

Voluntary Disconnects Electric (total accounts)					
			Total Accounts	2019 Annual	%
Ameren MO			1,233,191	304,016	24.65%
Empire			175,512	36,769	21%
Evergy Metro			291,625	105,688	36%
Evergy West			328,464	76,883	23%

Voluntary Disconnects Gas (total accounts)					
			Total Accounts	2019 Annual	%
Ameren MO			133,235	36,652	27.51%
Empire			43,564	8,500	19.51%
Liberty			52,589	552	1.05%
Summit			18,964	2,550	13.45%
Spire			1,186,236	87,514	7.38%

Annual Report Voluntary + Involuntary Disconnections

Total Annual Disconnects Electric (total accounts)					
			Total Accounts	2019 Annual	%
Ameren MO			1,233,191	313,109	25.39%
Empire			175,512	41,877	24%
Evergy Metro			291,625	130,376	45%
Evergy West			328,464	94,046	29%

Total Annual Disconnects Gas (total accounts)					
			Total Accounts	2019 Annual	%
Ameren MO			133,235	37,222	27.94%
Empire			43,564	10,133	23.26%
Liberty			52,589	2,595	4.93%
Summit			18,964	2,550	13.45%
Spire			1,186,236	151,018	12.73%

3 general questions have been asked of us throughout COVID-19

1. Are disconnections a problem?
 2. Are arrearages a problem?
 3. Should we have a disconnection moratorium?
- Noise in the data has been a consistent problem and will likely prove to be a challenge in making sound recommendations if conditions continue to deteriorate due to COVID-19.
 - What have we seen in publically reported data to date during COVID-19?

CWR Reports Every Metro

2020 KCPL Disconnects					2019 KCPL Disconnects				
Month	Non-Energy Assist	Energy Assist	Total Disconnects		Month	Non-Energy Assist	Energy Assist	Total Disconnects	
January			0	No Report	January	35	3	38	
February	123	10	133		February	26	2	28	
March	124	10	134		March	54	7	61	
April	119	11	130		April	233	49	282	
May	168	18	186		May	404	62	466	
June	164	16	180		June	266	37	303	
July	276	21	297		July	381	59	440	
August	316	31	347		August	206	25	231	
September	399	31	430		September	290	55	345	
October			0		October	173	25	198	
November			0		November			0	No Report
December			0		December	129	13	142	
2020 Total	1,689	148	1,837		2019 Total	2,197	337	2,534	
Amount from 2020 Annual Report					Amount from 2019 Annual Report				130,356

CWR Reports Evergy West

2020 GMO Disconnects					2019 GMO Disconnects				
Month	Non-Energy Assist	Energy Assist	Total Disconnect		Month	Non-Energy Assist	Energy Assist	Total Disconnect	
Januaray			0	No Report	Januaray	35	3	38	
February	103	16	119		February	26	2	28	
March	105	18	123		March	46	11	57	
April	103	17	120		April	190	50	240	
May	145	18	163		May	138	22	160	
June	142	17	159		June	118	28	146	
July	303	45	348		July	199	57	256	
August	233	25	258		August	155	52	207	
September	290	33	323		September	251	59	310	
October			0		October	128	27	155	
November			0		November			0	No Report
December			0		December	111	17	128	
2020 Total	1,424	189	1,613		2019 Total	1,397	328	1,725	

CWR Reports Ameren MO. Electric

2020 UE Disconnects				2019 UE Disconnects			
Month	Electric	Combination	Total Disconnects	Month	Electric	Combination	Total Disconnects
January	13,296	3,327	16,623	January	13,490	2,992	16,482
February	13,661	3,074	16,735	February	13,693	3,107	16,800
March	17,535	4,084	21,619	March	18,165	4,315	22,480
April	13,178	3,143	16,321	April	20,385	4,710	25,095
May	15,526	3,467	18,993	May	21,227	5,029	26,256
June	19,260	4,308	23,568	June	21,868	5,010	26,878
July	19,480	4,118	23,598	July	21,868	5,010	26,878
August	21,670	4,685	26,355	August	23,501	5,260	28,761
September			0	September	23,501	5,260	28,761
October			0	October	19,569	4,403	23,972
November			0	November	16,822	3,684	20,506
December			0	December	14,346	3,292	17,638
2020 Total	133,606	30,206	163,812	2019 Total	228,435	52,072	280,507

CWR Reports Empire/Liberty Electric

2020 Empire Disconnects		2019 Empire Disconnects	
Month	Total Disconnects	Month	Total Disconnects
Januaray	2,518	Januaray	2,185
February	2,031	February	2,178
March	2,517	March	2,570
April	2,315	April	2,712
May	2,268	May	3,070
June	2,776	June	2,567
July	3,014	July	3,062
August	2,715	August	2,983
September		September	2,443
October		October	2,517
November		November	2,111
December		December	2,381
2020 Total	20,154	2019 Total	30,779

CWR Reports Ameren MO. Gas

2020 UE Disconnects		2019 UE Disconnects	
Month	Total Disconnects	Month	Total Disconnects
January	685	January	769
February	660	February	715
March	876	March	880
April	753	April	1,028
May	1,018	May	1,327
June	1,465	June	1,601
July	1,649	July	1,601
August	1,887	August	2,062
September		September	2,062
October		October	854
November		November	725
December		December	645
2020 Total	8,993	2019 Total	14,269

CWR Reports Empire Gas

2020 Empire Disconnects		2019 Empire Disconnects	
Month	Total Disconnects	Month	Total Disconnects
Januaray	547	Januaray	546
February	503	February	498
March	616	March	653
April	600	April	702
May	625	May	833
June	587	June	701
July	687	July	681
August	532	August	645
September		September	530
October		October	656
November		November	541
December		December	598
2020 Total	4,697	2019 Total	7,584

CWR Reports Liberty Gas

2020 Liberty Disconnects		2019 Liberty Disconnects	
Month	Total Disconnects	Month	Total Disconnects
Januaray	222	Januaray	177
February	234	February	231
March	277	March	526
April	72	April	755
May	131	May	763
June	142	June	771
July	86	July	336
August	1,214	August	336
September	467	September	242
October		October	192
November		November	81
December		December	36
2020 Total	2,845	2019 Total	4,446

CWR Reports Spire

2020 Spire Disconnects				2019 Spire Disconnects			
Month	Laclede	MGE	Total Disconnects	Month	Laclede	MGE	Total Disconnects
January	1,812	292	2,104	January	851	99	950
February	1,791	263	2,054	February	1,924	221	2,145
March	1,791	1,281	3,072	March	5,071	2,446	7,517
April	1,324	398	1,722	April	5,666	4,713	10,379
May	1,326	434	1,760	May	6,997	5,017	12,014
June	1,391	419	1,810	June	6,513	4,423	10,936
July	3,284	2,045	5,329	July	6,348	3,653	10,001
August	3,851	2,677	6,528	August	5,666	530	6,196
September			0	September	3,563	3,351	6,914
October			0	October	3,076	2,440	5,516
November			0	November	699	313	1,012
December			0	December	1,142	278	1,420
2020 Total	16,570	7,809	24,379	2019 Total	47,516	27,484	75,000

CWR Reports Summit Gas

2020 Summit Disconnects		2019 Summit Disconnects	
Month	Total Disconnects	Month	Total Disconnects
January	32	January	14
February	50	February	63
March	81	March	124
April	0	April	190
May	0	May	277
June	0	June	108
July	0	July	0
August	279	August	39
September	111	September	168
October		October	25
November		November	13
December		December	6
2020 Total	553	2019 Total	1,027

Next Steps

- How to report LIHEAP and external funding?
- How to deal with planned shut-offs and safety disconnections?
- How to deal with double counting?
- How to deal with collections?
- How to deal with pay plans, budget billing?
- How can we minimize reporting?
- Look at the drafted rules?
- Future meetings and outreach?

Questions?

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