



Thank you for providing the opportunity to comment on Case No. AX-2023-0175.

This proposed rule would allow for publicly available, standardized reporting of disconnections, an improvement on our current system.

The rule could be improved further by adding a requirement for utilities to break monthly disconnection data down by zip code. The benefits of doing so are many, including determining if certain socioeconomic factors, such as class and race, play a part in which community members are selected for disconnection.

Due to historic redlining, communities of color across the country are subject to hotter temperatures during summers,<sup>1</sup> contributing to their household energy burden<sup>2</sup>, which may lead to a higher chance of disconnection. Warmer temperatures are also linked to poor air quality, making groups vulnerable to disconnection susceptible to negative health impacts that can come with hotter weather.

Nonprofits focused on community health and financial assistance would be able to use disconnection data broken down by zip code to provide targeted assistance to areas where they are needed the most. As heat waves and cold snaps become more frequent and more intense, it is essential that the communities most in need of help can be easily identified to protect public health and prevent the cascading harms that can come from a disruption in utility services.

Additionally, standardized reporting would allow for a fair analysis of how utilities compare with one another when it comes to preventing disconnections. Comparisons of utility disconnections can lead to better company policies, ultimately preventing disconnections: a goal we can all agree is worth pursuing.

Thank you for your time.

Jenn DeRose

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<sup>1</sup> Smits, Kelly. "Extreme Heat Is Coming. What Is St. Louis Doing about 'the Silent Killer' of Climate Change?" *STLPR*, 22 June 2023, [news.stlpublicradio.org/health-science-environment/2023-06-21/extreme-heat-is-coming-what-is-st-louis-doing-about-the-silent-killer-of-climate-change](https://news.stlpublicradio.org/health-science-environment/2023-06-21/extreme-heat-is-coming-what-is-st-louis-doing-about-the-silent-killer-of-climate-change).

<sup>2</sup> Percentage of a household's income spent on home energy bills.