

**BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of a Proposed Rulemaking )  
to Promulgate a New Rule Regarding a Residential ) Case No. AX-2023-0175  
Customer Disconnection Data Reporting Rule )

**COMMENTS OF THE CONSUMERS COUNCIL OF MISSOURI**

Comes Now the Consumers Council of Missouri (“Consumers Council”) and hereby submits the following comments on the Commission’s proposed amendments to the residential customer disconnection data reporting rule.

The proposed rule would resolve several current problems with the public reporting of utility disconnection data, which has been required by a subsection of the Commission’s Cold Weather Rule<sup>1</sup> since 1977. Sadly, there has not been agreement on how to interpret the current reporting rule. As the Office of the Public Counsel (“OPC”) has pointed out in great detail, differing interpretations of the reporting rule have limited the ability of the data that is reported to be very useful to the Commission. The data provided to the Commission under the current subsection has been recorded differently from one utility to the next, and from one year to the next.

The rule proposed by the Commission in this case would be organized as a new subsection (20 CSR 4240-13.075), and it is designed to clear up much the confusion, by

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<sup>1</sup> The reporting of disconnection data is currently required by 20 CSR 4240-13.055(15).

requiring these energy companies to provide standardized numbers that can be better compared on an *apples to apples* basis. The proposed rule will make factual information about utility disconnections more consistent as well as more transparent. Consumers Council praises the Commission Staff and the OPC for working towards an amendment of its rules to standardize disconnection information and to make that information more publicly available.

There has been confusion over the years about whether the information provided by the utilities under the current rule is even public information, because the information is only provided to the Commission Staff and the OPC.<sup>2</sup> The proposed rule would fix this problem by requiring all the information on utility disconnections to be publicly posted as a hyperlink on the Commission's website home page.

Having good data available on this topic is important because of its ability to inform public policy decision-making. Utility disconnections are linked to serious health risks, to educational barriers for children, and to a myriad of other problems associated with forced mobility and homelessness.

Consumers Council has one additional ask, related to the locational detail of the disconnection data provided. We believe that the Commission should require that certain disconnection data be provided in a format that breaks down the numbers at the level of (five-digit) zip codes. Requiring the reporting of disconnection information on this granular level would help all parties better focus in on potential problems in the future. All regulated utilities have the ability to track this information at the level of zip codes, and we believe

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<sup>2</sup> See 386.480 RSMo.

that having the data publicly available with this level of detail will promote policies that are geographically fair. Consumers Council suggests that the following language be added as a separate subsection as follows:

(2)(M) the numbers of residential meters to be reported pursuant to subsections (2)(A) through (2)(F) shall be provided in a format that breaks down those numbers into five-digit zip code regions;

Respectfully submitted,

Dated: July 13, 2023

/s/ John B. Coffman

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