



Introduction to Model Rules for Utility Credit and Collection Data Reporting

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Introduction

This memorandum introduces proposed Model Rules for Utility Credit and Collection Data Reporting. These Model Rules are the outgrowth of a process begun several years ago¹ to address the need for standardized, comparable information regarding utility efforts to collect revenues from payment-troubled customers.

While low-income customers are disproportionately vulnerable to payment difficulties, they are not the only customers who fall behind in payments and with regard to whom the utility and regulator must devise credit and collection policies.² Data to understand the impact of such policies is valuable for all residential consumers, not just for low-income consumers.

I. NARUC Has Called For Standardization of Data Reporting

Standardization of data was recognized as a valuable tool in a 2006 resolution of the National Association of Regulatory Utility Commissioners (NARUC). At the winter meetings in Washington, D.C., February 2006, the NARUC Board of Directors adopted a “Resolution Supporting the Gathering of Data for Electric and Natural Gas Distribution Companies by Individual State Utility Commissions or Energy Offices.”³ Among the reasons given for the adoption of the resolution were:

1. The importance of gathering aggregate residential billing and arrearage data, comparable among utilities and states,
 - a. to quantify the extent of customer indebtedness to utilities;
 - b. to quantify the financial impact of customer indebtedness on utilities;

¹ The issue was brought to NARUC’s attention in a paper prepared for the National Energy Assistance Directors’ Association in 2004: Howat, John, and Jerry McKim, Charlie Harak and Olivia Wein. *Tracking the Home Energy Needs of Low-Income Households Through Trend Data on Arrearages and Disconnections* (hereinafter cited as *Tracking the Need*), NEADA, May 2004. While its main focus was on obtaining data to justify additional home energy assistance to low-income customers, the paper also discusses data that would be useful in evaluating the efficacy of utility universal service offerings.

² For an explanation of the distinct categories of payment-troubled residential customers, by a former utility customer accounts manager, see, Grosse, Ron. *Win-Win Alternatives for Credit and Collections*. Monograph, revised August, 1997. Available from rgrosse@new.rr.com or the author.

³ The full text of the resolution is attached as Appendix A.

- c. to support State and federal low-income assistance programs, such as LIHEAP; and
 - d. to evaluate the effect on customer affordability of essential electric and natural gas service.
2. the difficulty that a lack of wide-ranging billing and arrearage data has posed for consumer groups, legislative offices and commissions in quantifying the problem of non-payment for consumers;
 3. the great assistance wide-ranging data, if compiled comparably across states and utilities, would be in formulating State and national policies to assure affordable electric and natural gas service for residential customers, and in supporting programs which are necessary to the health, safety and welfare of American households;
 4. the tools such data would provide to State and federal policymakers to evaluate and ensure that federal energy assistance funds, such as LIHEAP, are adequate to meet utility-related emergencies due to increases in energy prices and/or weather-related emergencies; and
 5. the benefits such compilation of comparable, periodic billing and arrearage data for residential customers over time would provide to State and federal policymakers to evaluate the effect on consumers of market conditions, higher energy prices, and weather conditions; and to evaluate the need for additional targeted financial assistance and energy management programs, as well as the need for review of State commission policies and practices to protect seniors and low-income customers.

The resolution urges each State to gather relevant utility billing and arrearage data from all electric and gas utilities within its State commission jurisdiction. It encouraged other (*i.e.* non-jurisdictional) providers of electric and gas to work cooperatively with their State commission to provide the necessary aggregate data. To facilitate this resolution, NARUC directed the Staff Subcommittee on Consumer Affairs to form a collaborative workgroup with all interested stakeholders to design a survey template and a data dictionary of terms. It further urged each State to use and distribute the data dictionary and survey to all the utility companies within its State.

NARUC also urged each State commission or energy office to generate a list of commission or energy office contacts for this project. The resolution further urged each State commission or energy office to direct utility companies to forward all questions about the project to its Commission contact, who in turn, would then forward the questions to the Staff Subcommittee on Consumer Affairs or its designee in order to ensure the consistency of data collection.

Under the resolution, each State commission or energy office was asked to aggregate the company-level data into appropriate industry summary data and submit it to

the Staff Subcommittee on Consumer Affairs or its designee for analysis. As part of this step, the resolution urged each State commission or energy office contact to document all variations and exceptions in the data and submit it for analysis. Finally, under the resolution, affected stakeholders would be allowed an opportunity to review the data analysis and derived conclusions prior to publication in order to provide clarification and ensure consistency.

II. The Importance of Standardized and Comprehensive Data Collection

For a number of years, advocates for low-income customers and some utility regulators have sought better data on utility residential credit and collection. There is a wide variety of transactions between utility and residential consumer, and accounts of transactions maintained by utilities, that would be useful subjects of analysis. In a presentation to the NARUC Committee on Consumer Affairs at the winter meeting in February 2006, consumer affairs expert Barbara Alexander set out her view of some of the reasons that, in her words, “Regulators Need the Facts”:

1. Are uncollectible balances or bad debt expenses rising due to unpaid residential customer bills? Commercial customers? Compared to when? How much?
2. Do budget payment programs work?
3. How many disconnections of service occur for residential customers? When?
4. How many disconnected customers are reconnected and how soon?
5. Do the regulatory consumer protection rules that allow deposits result in denial or delay of service? Contribute to nonpayment?
6. Do the payment arrangement policies or rules “work”? For which customers?

Alexander went on to describe a number of regulatory functions where answers to the questions she set out would contribute to better regulatory outcomes:

1. Rate cases: review efficiency of utility credit and collection programs; determine reasonableness of uncollectible expense and O & M expenses in these areas.
2. PUC Rulemaking: what minimum consumer protection policies should be adopted or changed to reflect the operational realities of utility service?

3. Low-Income programs: Is there a need for a low income program? What kind? To solve what problem? Is the program efficient or effectively implemented?⁴

To obtain this data, Alexander opined, mandatory reporting is necessary, including definitions, reporting requirements, and possibly reporting templates. Alexander would allow individual utilities to obtain a waiver or exemption for particular data that is not available under the uniform definition for a certain time or with an acceptable substitute. But, in Alexander's view, uniformity of definitions and data gathering and reporting is crucial to fashioning policies to address the efficiency of utility credit and collection activities, and the need to protect customers from too frequent disconnections and too long periods without service.

Towards that end, and recognizing that data collection is not uniform today, Alexander stated that "the key objective is to get data that is comparable between utilities regulated within the state." The "next best" data is comparable data historically for one utility. The ideal, per Alexander, is data that is comparable nationally.⁵

Alexander recommends that, at the national level, regulators build on the Residential Energy Consumption Survey (RECS) data maintained by the U.S. Department of Energy.⁶ Finally, Alexander stresses that that the data must be available to the public or published regularly by the commission.

Low-income advocates interested in backing up requests for additional federal and state energy assistance with solid data recommended in *Tracking the Need* that commissions require three tiers of data be reported by electric and gas utilities, the tiers ranging from the most important to data that could be dispensed with if cost or other factors militated against its collection. The first tier is data that the authors argue Commissions should be able to gather immediately, and monthly:

1. Total Number of Residential Accounts
2. Total Number of Residential Accounts in Arrears⁷
3. Total Dollar Number of Residential Accounts in Arrears⁸

⁴ *Id.*, Slide 2.

⁵ Alexander recognizes that this is unlikely to be realistic for all useful data. However, she notes that, the key indicators, including data regarding incidence of arrears, nonpayment, and disconnection, are likely to be comparable among all utilities. *Id.*

⁶ Howat, et al, in *Tracking the Need*, point out that RECS data is highly aggregated. It is also gathered no more frequently than every four years.

⁷ Sorted into vintages where possible. The authors note that many utilities collected their arrearage data in aged format for collections management purposes. *Tracking the Need*, at 18.

4. Total Number of Residential Disconnections⁹

Tracking the Need goes on to identify parallel data requirements broken out for low-income customers. The authors place these requirements in Tier 2, “Additional Data that Commissions Should Gather, But that Might Take Some Time and Resources in Some States”:

1. Total Number of Low-Income Residential Accounts
2. Total Number of Low-Income Residential Accounts in Arrears
3. Total Dollar Number of Low-Income Residential Accounts in Arrears
4. Total Number of Low-Income Residential Disconnections¹⁰

Tier 3 was defined as optional data, “Additional Data for Tracking the Well-Being of Low-Income Energy Customers, In States Where These Data Are Available”:

1. Dollar Value of Residential Accounts Written Off as Uncollectible
2. Dollar Value of Low-Income Residential Accounts Written Off as Uncollectible
3. Total Number of Residential Accounts Having Service Restored
4. Total Number of Low-Income Residential Accounts Having Service Restored
5. Total Number of Residential Accounts Sent Notice of Disconnection
6. Total Number of Low-Income Residential Accounts Sent Notice of Disconnection
7. Total Number of Low-Income Customer Deferred Payment Arrangements¹¹

The Tier 3 data is given lesser importance in the *Tracking the Need* report because it is not necessary to make the case for release of that emergency energy assistance under the Low Income Home Energy Assistance Program (LIHEAP).¹² That is, *Tracking the Need* focuses on the use of the data for justifying sufficient home energy assistance, and not on some of the other functions utilities perform and regulators oversee, such as optimizing the efficiency of bill collection. Regulators will want to look as well at data useful for understanding the impact of utility bills and practices on all residential customers, and on the efficacy of utility credit and collection practices generally.

⁸ Sorted into vintages where possible.

⁹ *Tracking the Need*, at p. 16.

¹⁰ *Id.*, at 17.

¹¹ *Id.*

¹² *Id.*, at 19.

The data needed to evaluate the effectiveness and cost-effectiveness of utility bill assistance programs are extensive. For example, in a classic impact analysis of a low-income bill assistance pilot (the third regulatory purpose cited by Alexander, above), the evaluators obtained data from the utility on the following transactions and events, among others, for about 1000 customers (participants and control group members):

1. the account number,
2. customer income information,
3. poverty level data (e.g., income and family size),
4. consumption,
5. type of meter read,
6. bill date,
7. special agreement codes,
8. billing data,
9. bill adjustments by amount and type,
10. end balances,
11. budget month code,
12. bill message codes,
13. credit action codes,
14. transfer amounts,
15. weatherization code and year,
16. energy assistance grant data,
17. EAP credits,
18. beginning accounts receivable at the onset of the pre and post periods,
19. aged account balance arrearages at the onset of the pre and post periods,
20. summary data for each account, including:
 - a. the number of service transactions, including
 - i. various termination and disconnect letters
 - ii. 'no meter read' letters
 - iii. personal contacts, terminations
 - iv. reconnections
 - v. payment extension, negotiations, and changes
 - vi. high bill complaints, informal and formal mediations,
21. costs for each type of transaction for the pre and post periods.¹³

Of course, evaluations of this kind involve aggregating the relevant data for various samples of customers, chosen to represent the population whose experience and behavior are under examination. The Model Rules offered in this report ask for aggregated data for the entire population. Some of the analyses that are performed by program evaluators on sampled data are similar to those that would be performed by utilities and regulators on population data gathered in compliance with a data reporting

¹³ Peach, H. Gil, Anne West, Helen Perrine & Howard Reichmuth, *Impact Assessment of the Equitable Gas Company Energy Assistance Program*. Beaverton, Oregon: H. Gil Peach & Associates, 1996, Monograph 969-1, at 20.

rule. For example, credit and collection data can be analyzed to test the hypotheses that a correlation exists between the age and size of arrearages and the numbers of disconnections.

Roger Colton, an economist and low-income energy expert, has identified data that would be needed to evaluate whether low-income customers of a utility are better off as the result of a proposed merger.¹⁴ He proposed collection of data for what he calls “confirmed low-income customers.” Confirmed low-income customers are residential customers whose low income is known to the utility because of bill assistance program or special rate participation. In states with weather-related termination protections, the category also includes all customers whose billing records are coded by the utility for purposes of determining eligibility for the weather-related termination protections¹⁵ (whether or not the customer actually applies for such protections). Finally, it includes customers whose sources of income, as known to the utility, include any of the following:

1. LIHEAP, the federal home energy assistance program for low-income customers (Low-Income Home Energy Assistance Program);
2. Temporary Assistance to Needy Families (TANF), the program formerly known as AFDC (Aid to Families with Dependent Children);
3. General Assistance;
4. Supplemental Security Income (gold card from the Social Security Administration).
5. Additional mechanisms to use in identifying “confirmed low-income customer” can be added either at the utility’s own initiative or upon application by other parties to the Board.

For all confirmed low-income customers, Colton proposed that the utility be required to provide the following information monthly:¹⁶

¹⁴ See, Prefiled Direct Testimony of Roger D. Colton on behalf of the New Jersey Division of the Ratepayer Advocate (now, Rate Counsel) in *I/M/O the Joint Petition of Public Service Electric & Gas Company and Exelon Corporation for Approval of a Change in Control of PSE&G Company, and Related Authorizations*, N.J. B.P.U. Docket EM05020106; November 14, 2005, at pp. 60-63, and Exhibit RDC-8. This testimony is available at:

http://www.rpa.state.nj.us/PSEG_Exelon_Merger/EM05020106%20Roger%20Colton%20Testimony.pdf

¹⁵ A number of utilities in many states have protections against termination in the event of dangerous weather, including hot weather in the summer and cold weather in the winter. In most cases, the protections last for a defined season.

¹⁶ Colton Prefiled Direct Testimony, Exhibit RDC-8.

1. The number of confirmed low-income customers;
2. The distribution of full retail bills;
3. The number of active accounts;
4. The number of discontinuance/termination notices;
5. The number of Arrearage Forgiveness Program¹⁷ notices;
6. The number of Arrearage Forgiveness Program final reminders;
7. The number of telephone contacts between the utility and the low-income customer (broken out by inbound and outbound where data is available);
8. The number of field visits;
9. The number of terminations;
10. The number of reconnections;
11. The number of accounts charged off as uncollectible;
12. The dollar amount of accounts charged off as uncollectible;
13. The number of new payment arrangements;
14. The number of overdue accounts by dollar level as follows:
 - a. \$1-\$100;
 - b. \$101 - \$500
 - c. \$501 - \$1000
 - d. Over \$1000.
15. The total dollars of overdue accounts by dollar level as follows:
 - a. \$1-\$100;
 - b. \$101 - \$500
 - c. \$501 - \$1000
 - d. Over \$1000.
16. The numbers of overdue accounts by payment status, as follows:
 - a. current
 - b. 31 - 60 days
 - c. 61 – 90 days
 - d. 91 or more days
17. The total dollars of overdue accounts by payment status, as follows:
 - a. current
 - b. 31 - 60 days
 - c. 61 – 90 days
 - d. 91 or more days.

According to Colton, this information would permit the regulator to track the experience of low-income customers over time, and determine whether the utility action (in this case, a proposed merger) has improved or worsened the situation of such

¹⁷ A number of utilities offer their low-income customers the opportunity to amortize the arrearages that they amassed before they applied for participation in bill assistance. These program elements are known by different names. The term “Arrearage Forgiveness Program” is a placeholder for the name used by the utilities in the state.

customers. According to Colton, the analysis would be a performance-based evaluation, rather than a subjective account of post-merger experiences.

In some cases, having the data will provide a basis for a policy judgment. In other cases, it will highlight areas where more specific analysis, and data, are required. Some of the questions that comparable data gathered consistently over time could help answer include the following, not necessarily in order of importance:

1. Whether the average level of arrearages per customer has increased or decreased over time within a give state, and across all states.
2. Whether utilities are allowing unpaid bills to build up over time, or are initiating collection actions before arrearages are allowed to age longer than 30 or 60 days.
3. Whether gross write-offs of bad debt have increased or decreased over time, within a given state and across all states;
4. Whether combination utilities have greater or lesser arrearages per customer.
5. At what rate customers disconnected for non-payment are being reconnected within a reasonable time, and what percentage of disconnected customers are remaining without service for significant periods of time.
6. What the difference in uncollectibles and in collection activities are between states with different weather conditions, and the attendant impacts on usage as well as on hardship.
7. Whether customers who are receiving termination notices tend to have on average higher usage and higher bills than customers who do not receive such notices.
8. Whether the costs of administering means-tested bill assistance and other universal service rates or programs are increasing or decreasing.

The ability to undertake analyses of the impact of utility credit and collection policies on target populations and related revenues and costs, as was pointed out by NRRI Senior Economist Mr. Costello,¹⁸ depends on having data that is “apples and apples,” drawn from comparable time periods, using comparable if not identical definitions of the events or transactions in question.

¹⁸ See, e.g., Staff Subcommittee on Consumer Affairs, *Report on Collections Data Gathering By States* (Final Report on Data Gathering), July 2007, at 10. Mr. Costello prepared the data analysis contained in the report. The report will be posted to the NRRI website when it has been approved for public release by the NARUC Committee on Consumer Affairs. It will be presented to the Committee by the Staff Subcommittee at the NARUC Summer Meetings in mid-July, 2007.

III. The 2007 Committee Survey & Analysis: Setting the Table for Model Rules

Much of the work contemplated by the 2006 Resolution has been completed, and the issue is ripe for NARUC to address Model Rules for Credit and Collection Reporting. In July 2007, with the help of NRRI, the Staff Subcommittee of the NARUC Consumer Affairs Committee has prepared for consideration by the Commissioners its Final Data Gathering Report. This report summarized and analyzed the data provided to the Staff Subcommittee working group by the commissions or energy offices of 31 states.¹⁹ It also made comparisons, where possible, to similar data collected in two previous surveys.

As directed in the 2006 NARUC Resolution, the Staff Subcommittee designed the survey with the input of stakeholders, including utility representatives²⁰ and consumer and low-income representatives. The data definitions used in the survey were developed in the same manner. The survey is attached as Appendix B.

While 31 states provided at least some information to the Staff Subcommittee, the Subcommittee noted in the Final Report that there were a number of data problems that limited the policy analyses possible based on the information gathered:

In many instances, the states did not collect the data and had to rely on the utility companies to furnish the data. In some instances, the participating states were not able to collect data from all of the energy companies within the state.²¹

The National Regulatory Research Institute's Senior Institute Economist Ken Costello provided a statistical analysis of the survey results. While he was able to show certain trends and facts of value to policy makers, he also identified areas where the survey data was not sufficient for that purpose. Most importantly, he noted that the data definitions were not sufficient in at least two cases to support usable conclusions:

1. The survey sought information on "terminations per residential customer." Mr. Costello points out that this datum is less useful than the statistic "terminations per customer in arrears." As he explains, the problem in measuring "terminations per residential customer" is that the survey called for utilities to report terminations over a twelve-month period, whereas the number of

¹⁹ "A total of 31 states submitted data for some or all of the questions, 25 states submitted data for the electric industry, 26 states did the same for the gas industry and 16 for combination industry." Final Report on Data Gathering at 7.

²⁰ Edison Electric Institute and the American Gas Association representatives participated and concurred in the survey document.

²¹ Final Report on Data Gathering at 7.

customers in arrears was counted at specific points in time. “This incomparability makes it difficult to interpret a statistic derived from dissimilar periods.”²²

2. The survey questions combined all arrears into one grouping. This approach detracted from the ability to use arrearage data as an indicator of consumer payment problems. Mr. Costello noted that unpaid accounts tend to lead to service terminations as arrears extend beyond 60 or 90 days, so including data from all cases of arrearage likely masks the underlying termination patterns in which the policy maker is interested. Also, the analysis of responses regarding “terminations as a percentage of the number of unpaid accounts” suffered from the same incomparability of time periods as in the analysis of “terminations per residential customer.”²³

In addition, Mr. Costello noted problems related to the lack of sufficient data points. For example, he pointed out that large differences between means and median were identified for some statistics, illustrating a heavily skewed distribution. In some cases, he noted, this problem could be attributable to the fact that there were few observations, so those with extremely high values caused the mean to be much higher than the median. While the median could be and was used to better reflect an average value than the mean, it would have been valuable to have a larger (and more representative) number of data points to analyze.²⁴

The Staff Subcommittee reviewed the data and the analysis that was possible in light of the data limitations, and came to the conclusion that the data collection project should continue and be strengthened:

The Subcommittee remains convinced that it is critical to continue the effort to gather national residential collections data. ...In fact, the justifications [for collecting such data nationally] will likely grow stronger as utility costs continue to rise and consumers’ ability-to-pay problems worsen. ... [E]xperience with [the past three] surveys has lead to a better understanding of what it will take to overcome these challenges for future surveys.²⁵

According to the Staff Subcommittee, the major change that needs to be made by NARUC members is “to begin a statewide effort to aggregate utility data using a uniform

²² *Id.*, at 10.

²³ *Id.*, at 12-13.

²⁴ *Id.*, at 10.

²⁵ *Id.*, at 15.

data dictionary where possible.”²⁶ To this end, the Subcommittee recommended the following:

1. That NARUC request NRRI to develop model data collections rules;
2. That these model rules be submitted to NARUC for adoption at the annual convention in November;
3. That NARUC direct the Consumer Affairs Subcommittee to complete a fourth survey in 2008 consistent with the 2005 Resolution.²⁷

IV. Introduction to Model Rules

The attached Interim and Model Rules, Appendices D and E, are NRRI’s response to the 2007 request by the Staff Subcommittee. The Model Rules provide suggested answers to the following questions:

1. Who should provide reports as required by the Rules?
2. How frequently should the reports be filed?
3. What data should be reported?
 - a. How should various events be defined for purposes of the reports?

A. Two Versions Presented: Interim and Model Rules

There are two versions of data gathering rules presented here. One is called an “interim form,” Appendix D, and the other the “Model Rules,” Appendix E. The “interim form” is based on the survey taken in 2005-6 and written up in the *Final Report on Data Gathering*. This author amended the prior definitions slightly to address the comparability problem noted by Mr. Costello, to the extent possible in a “interim form” version.

The Model Rules are in format adapted from the Pennsylvania Public Utilities Commission rules requiring credit and collections data reporting. These rules and the implicit data definitions were adopted by the Pennsylvania Commission in large part following a collaborative process within Pennsylvania, involving not only local utilities, but large multi-state utilities such as First Energy, Dominion, Allegheny, Exelon, and

²⁶ *Id.*

²⁷ *Id.*

NiSource, all of whom supported the rule. They also reflect data requirements found in rules from Maine, Massachusetts, Vermont and Washington State.²⁸

As might be expected, the Model Rules call for greater detail about various transactions and events. For example, the Model Rule disaggregates the number and amount of arrearages by age and average amount aged,²⁹ whereas the interim form does not ask for aged arrearages. The Model Rule is the more valuable as a tool for policy making, because it captures data in sufficient detail to make usable analysis possible.

A note on process: some states provide standard forms for reporting, and allow or require electronic filing of reports. Regulators may also wish to keep a list of parties who want copies of the material – if it is kept electronically, it should be no great burden on the utilities to supply it to all who put their names and contact information on this list.

B. Interim Form of Rule Described

The interim form, Appendix C, is presented here in recognition of the fact that in a number of states, or for various utilities within any given state, utility data collection systems are not presently configured to capture the data sought in the Model Rules. Also, the interim form has already been reviewed and approved by industry stakeholders, as it is based almost entirely on the most recent survey. Of course, approval by industry should not be the gauge of the reasonableness or necessity of a rule.

While the interim form of data requirement should be easier to implement than the Model Rule, because it calls for less granular reporting, by the same token it is less useful to the regulator in following the impact of bills and credit and collection practices on customers, and in assessing utility performance and identifying potential trouble areas in the credit and collection function. For this reason, the interim rule should not be considered the end point of the regulatory process, but merely a beginning as the Commission moves its jurisdictional utilities towards the ability to provide the level of detail called for in the Model Rule.

Note that two data requirements have been added to the interim rule in an effort to plug the obvious data gaps from the previous survey forms. One addition to the interim rule is a question asking for “terminations per customer in arrears.” This form of question was suggested by Mr. Costello in his NRRI analysis of the results of the most recent NARUC survey. The other added question asks for the “average duration of disconnection for restored accounts.” This question comes directly from the reporting requirements of the Massachusetts Department of Public Utilities (then the Department of Telecommunications and Energy), in Docket DTE 05-086. Mr. Costello noted the

²⁸ While this report does not include the Iowa rules, *Tracking the Need* suggests that the Iowa rules call for much of the same data.

²⁹ These requirements came from 66 Pa C.S. 56.231. Section 56.231 was developed in a commission rulemaking, rather than in the collaborative.

inability to determine this information from the data provided in response to the survey. It is useful in determining the efficacy of credit and collection procedures and policies to know how long customers are without energy utility services once their service has been terminated.

C. Model Rule Described

As noted above, the Model Rule on Credit and Collections Reporting is based on the Pennsylvania rules (66 Pa C.S. 1415 & 56.231) with some additional data requirements borrowed from rules in other states, and data requirements adapted from Roger Colton's low-income data tracking proposal. The data definitions have been edited to be generic in format.

There are 2 portions to the Model Rule:

Residential Collections Reporting: Asks for data that would permit a utility or regulator to evaluate the efficiency of the utilities' credit and collections practices. The purpose is to identify problem areas that might need further research to determine causes and solutions.

Universal Service: Pertains to data requirements on bill assistance, low-income energy efficiency, and other programs or rates targeted to low-income and payment-troubled customers, to help ensure they can maintain service

These Model Rule data requirements are describe below, and set out more fully in Appendix D.

Unless otherwise noted, the Model Rules call for reports (and related data collection) monthly, with an annual summary. Some questions call for information regarding all residential customers, including Bill Assistance recipients; others exclude Bill Assistance recipients. A separate set of reporting requirements captures data specific to evaluating Bill Assistance programs or rates.

V. Feasibility of Data Collection per Model Rule

A number of states have implemented extensive reporting requirements. Appendix D provides a summary of data requirements from seven states (Maine, Massachusetts, Minnesota, Ohio, Pennsylvania, Vermont, and Washington State). *Tracking the Need* summarized the data requirements of five states (Iowa, Massachusetts, Ohio, Pennsylvania, and Rhode Island). Some of these states' requirements are very detailed. Utilities within these states have generally been able to fulfill the reporting requirements.

Some may raise a concern that the Model Rule is burdensome in its request for data broken out by a number of subcategories, such as (a) whether the utility service is used for heating or not, (b) arrearages broken out by vintage, (c) arrearages broken out by amount, (c) terminations broken out by age and amounts of arrearages, and (d) reconnections by time without service. It is possible to disagree reasonably about the specific breakpoints to be used for some of these categorizations. However, the items in the Model Rules are reported now by utilities in one or more states. The question is not whether a requirement is “burdensome,” but whether the benefits of the information justify the collection cost. The judgment implicit in the Model Rules is that this justification exists.

It may be argued that there are too many differences between the requirements of the various states to make the Model Rule practical. As for the seven states whose requirements are gathered in Appendix E, the initial impression of great differences among these various state rules dissipates once the materials are examined more closely – the main categories of data sought are similar across the states sampled. The main differences, other than in choosing breakpoints, are in format.

Regulators and observers in most states do report that the usefulness of the data collected is compromised to one extent or another by the fact that utilities track some of the information in different ways. For example, one utility in Colorado does not separate residential and business accounts.³⁰ Another only tracks accounts that are more than 60 days past due and with a balance greater than \$100.³¹ In Ohio, some utilities code an account as “final” almost immediately after disconnection, while others continue to use the same customer number when customers are reconnected.³²

In addition, the definition of active and inactive Percentage of Income Payment Plan customers varies among the utilities.³³ This inconsistency makes it difficult to compare utility performance and customer experiences from utility to utility in the state, and also impedes the aggregation of meaningful data on a statewide level.³⁴ In developing model rules, “it will be critical to state clear, consistent definitions of what is being tracked, in order to compare apples to apples.”³⁵ It will also be crucial for the regulator to enforce these data definitions, by reviewing the data sources and data

³⁰ Email to author from Terry Bote, Colorado PUC External Affairs, May 23, 2007.

³¹ *Id.*

³² Email from Dave Rinebolt, July 6, 2007.

³³ *Id.*

³⁴ *Id.*

³⁵ *Id.*

definitions used by the reporting utilities, to ensure that all utilities are following the data definitions set out by the Commission.

It may be that utilities will argue against requiring and enforcing consistency, on the grounds that it would be costly to reprogram their billing systems and other computer software that supports the credit and collections functions. In effect, they argue that the cost of gathering the data is greater than the benefit in terms of improved practices and outcomes for customers. It is beyond the scope of this paper to evaluate the *bona fides* of this claim, other than to note that (a) utilities who are effectively managing their receivables will want this information for that purpose in any event, and (b) utilities large and small in a number of states have been complying with such requirements for some years.

Appendix A

February 2006 Resolution of NARUC Board of Directors

“Resolution Supporting the Gathering of Data for Electric and Natural Gas Distribution Companies by Individual State Utility Commissions or Energy Offices”

WHEREAS, The National Association of Regulatory Utility Commissioners (NARUC) recognizes the importance of gathering comparable aggregate residential billing and arrearage data to quantify the extent of customer indebtedness to utilities and the financial impact of customer indebtedness on utilities; to support State and federal low-income assistance programs, such as LIHEAP; and to evaluate the impact on customer affordability of essential electric and natural gas service; *and*

WHEREAS, The lack of wide-ranging billing and arrearage data has made it more difficult for many consumer groups, legislative offices and commissions to quantify the magnitude of the problem of non-payment for consumers; *and*

WHEREAS, The wide-ranging data compiled would be of great assistance to formulate State and national policies to assure affordable electric and natural gas service for residential customers, and to support programs which are necessary to the health, safety and welfare of American households; *and*

WHEREAS, The data compiled would provide State and federal policymakers with the tools needed to evaluate and ensure that federal energy assistance funds, such as LIHEAP, are adequate to meet utility-related emergencies due to increases in energy prices and/or weather related emergencies; *and*

WHEREAS, Based on survey data compiled by the NRRI/NARUC Staff Subcommittee on Consumer Affairs in 2002 and 2004, although there are at least eighteen States that are known to collect and report such data, it is necessary to have more comparable and inclusive data for the entire nation; *and*

WHEREAS, The compilation of comparable, periodic billing and arrearage data for residential customers over time would be very beneficial to State and federal policymakers to evaluate the impact of market conditions, higher energy prices, and weather conditions; evaluate the need for additional targeted financial assistance and energy management programs, as well as the need for review of State commission policies and practices to protect seniors and low-income customers; *and*

WHEREAS, NARUC recognizes that the National Association of State Utility Consumer Advocates (NASUCA), National Energy Assistance Directors Association (NEADA), Consumers Union, Consumer Federation of America, National Consumer Law Center (NCLC), National Low Income Energy Consortium (NLIEC), and the AARP (formerly the American Association of Retired Persons) support this resolution; *now therefore be it*

RESOLVED, That the Board of Directors of the National Association of Regulatory Utility Commissioners (NARUC), convened in its February 2006 Winter Meetings in Washington, D.C., urges each individual State to gather relevant utility billing and arrearage data from all electric and gas utilities within its State commission jurisdiction and encourages other providers of electric and gas to work cooperatively with their State commission to provide necessary aggregate data; *and be it further*

RESOLVED, That NARUC directs the Staff Subcommittee on Consumer Affairs to form a collaborative workgroup with all interested stakeholders to design a survey template and a data dictionary of terms, and to urge each State to use and distribute the data dictionary and survey to all the utility companies within its State; *and be it further*

RESOLVED, That NARUC urges each State commission or energy office to generate a list of commission or energy office contacts for this project; *and be it further*

RESOLVED, That NARUC urges each State commission or energy office to direct utility companies to forward all questions about the project to its Commission contact, who in turn, will then forward the questions to the Staff Subcommittee on Consumer Affairs or its designee in order to ensure the consistency of data collection; *and be it further*

RESOLVED, That NARUC urges each State commission or energy office to aggregate the company level data into appropriate industry summary level data and submit it to the Staff Subcommittee on Consumer Affairs or its designee for analysis; and urges each State commission or energy office contact to document all variations and exceptions in the data and submit it for analysis; *and be it further*

RESOLVED, That affected stakeholders be allowed an opportunity to review the data analysis and derived conclusions prior to publication in order to provide clarification and ensure consistency.

Sponsored by the Consumer Affairs Committee

Adopted by the NARUC Board of Directors February 15, 2006

Appendix B

NARUC 2005-2006 Survey

All answers broken out by Natural Gas, Electric, and Combination Utilities

1. The number of residential accounts as of October 1, YEAR 1, including both heating and non-heating accounts.
2. The number of residential accounts past due as of October 1, YEAR 1, where the due date is day zero in the arrearage aging process. If possible, include those accounts at least one day overdue. Please footnote any variation along with the question number in the comment section at the end of the report.
3. The number of residential accounts as of May 1, YEAR 2, including both heating and non-heating accounts.
4. The number of residential accounts past due as of May 1, YEAR 2, where the due date is day zero in the arrearage aging process. If possible, include those accounts at least one day overdue. Please footnote any variation along with the question number in the comment section at the end of the report.
5. The number of residential disconnections/terminations for non-payment of customers in arrears, for each month of YEAR 1.³⁶
6. The number of residential accounts receiving regular LIHEAP cash grants for LIHEAP program year winter YEAR 1 – YEAR 2.
7. The number of residential accounts, receiving emergency LIHEAP crisis grants for LIHEAP program year winter YEAR 1 – YEAR 2.
8. The total revenue owed on residential accounts past due as of October 1, YEAR 1, where the due date is day zero in the arrearage aging process. If possible, include those accounts at least one day overdue. Please footnote any variation along with the question number in the comment section at the end of the
9. The total revenue owed on residential accounts past due as of May 1, YEAR 2, where the due date is day zero in the arrearage aging process. If possible, include those accounts at least one day overdue. Please footnote any variation along with the question number in the comment section at the end of the report

³⁶ Question based on NRRI analysis of prior years' surveys. See Final Report, p. 13.

10. The number of residential disconnections/terminations for non-payment during the calendar year YEAR 1.
11. The number of LIHEAP recipient accounts disconnected or terminated for non-payment during the calendar year YEAR 1.
12. The total annual residential billings (dollar amount) for the calendar year YEAR 1.
13. For each industry in your state, please provide the total annual gross residential write-offs for calendar year YEAR 1. An account is considered written-off when it is removed from inactive status, no longer showing as a past due receivable, and placed into the accounting category known as gross write-offs.
14. The total number of residential accounts disconnected/terminated for nonpayment and subsequently restored (reconnected) during the calendar year YEAR 1.
15. The number of LIHEAP recipient accounts disconnected/terminated for nonpayment and subsequently restored (reconnected), during the calendar year YEAR 1.
16. Average duration of service disconnection for restored accounts³⁷

³⁷ Source: Massachusetts requirements from decision in DTE 05-086.

Appendix C

Interim Data Gathering Rule³⁸

All answers broken out by Natural Gas, Electric, and Combination Utilities

1. The number of residential accounts as of October 1, YEAR 1, including both heating and non-heating accounts.
2. The number of residential accounts past due as of October 1, YEAR 1, where the due date is day zero in the arrearage aging process. If possible, include those accounts at least one day overdue. Please footnote any variation along with the question number in the comment section at the end of the report.
3. The number of residential accounts as of May 1, YEAR 2, including both heating and non-heating accounts.
4. The number of residential accounts past due as of May 1, YEAR 2, where the due date is day zero in the arrearage aging process. If possible, include those accounts at least one day overdue. Please footnote any variation along with the question number in the comment section at the end of the report.
5. The number of residential disconnections/terminations for non-payment of customers in arrears, for each month of YEAR 1.³⁹
6. The number of residential accounts receiving regular LIHEAP cash grants for LIHEAP program year winter YEAR 1 – YEAR 2.
7. The number of residential accounts, receiving emergency LIHEAP crisis grants for LIHEAP program year winter YEAR 1 – YEAR 2.
8. The total revenue owed on residential accounts past due as of October 1, YEAR 1, where the due date is day zero in the arrearage aging process. If possible, include those accounts at least one day overdue. Please footnote any variation along with the question number in the comment section at the end of the

³⁸ For states with no data gathering rule today, and to indicate minimum requirements agreed to by all stakeholders to post-2006-Resolution process.

³⁹ Question based on NRRI analysis of prior years' surveys. *See Final Report on Data Gathering*, p. 13.

9. The total revenue owed on residential accounts past due as of May 1, YEAR 2, where the due date is day zero in the arrearage aging process. If possible, include those accounts at least one day overdue. Please footnote any variation along with the question number in the comment section at the end of the report
10. The number of residential disconnections/terminations for non-payment during the calendar year YEAR 1.
11. The number of LIHEAP recipient accounts disconnected or terminated for non-payment during the calendar year YEAR 1.
12. The total annual residential billings (dollar amount) for the calendar year YEAR 1.
13. For each industry in your state, please provide the total annual gross residential write-offs for calendar year YEAR 1. An account is considered written-off when it is removed from inactive status, no longer showing as a past due receivable, and placed into the accounting category known as gross write-offs.
14. The total number of residential accounts disconnected/terminated for nonpayment and subsequently restored (reconnected) during the calendar year YEAR 1.
15. The number of LIHEAP recipient accounts disconnected/terminated for nonpayment and subsequently restored (reconnected), during the calendar year YEAR 1.
16. Average duration of service disconnection for restored accounts⁴⁰

⁴⁰ Source: Massachusetts requirements from decision in DTE 05-086.

Appendix D

Model Rule for Gathering and Reporting of Utility Credit and Collection Data¹

Purpose:

To gather data necessary to determine effects of utility and regulatory policy and practices upon customer health, safety and retention, working capital or cash flow, uncollectible levels and collections of the affected public utilities

The Model Rule set forth below contains two main sections: residential collections reporting and Universal Service program² reporting. Within 15 days after the end of each month, each electric, gas and steam heat utility shall file with the Commission a report containing the following information for that month. Within 31 days from the end of a calendar year, each such utility shall file with the Commission a report containing the following information for the year as a whole.

All collections data is residential customer data. In the Collections section, where it is appropriate, there is a statement in each item that indicates whether data on Universal Service recipients should be included in the report for that item.

Presented below is the definition of each data type that must be reported. Each reporting datum has been assigned a unique number as a reference. At the end of each variable definition, an indication of whether the value is a “Number” or “Dollar Amount” is included.

Kindly follow the variable definitions in the data dictionary when reporting data to the Commission. If you are reporting data for a variable that does not fully reflect our definition for the data, please tell us how your definition differs from that in the Model Rule, and indicate if and when you will be able to report the data in accordance with our definition. If you cannot reflect the Model Rule definition and you will not be able to report the data in accordance with the Commission definition, provide justification for the continued variation.

Companies that fail to file information required in Section 3.308(B) within six months of the month being reported shall be precluded from disconnecting any residential customers.³

¹ Footnotes in this Appendix are part of the Model Rule.

² Universal Service is used here to indicate any means-tested program or rate to render bills affordable for low-income customers, and thereby extend service to all regardless of ability to pay the standard rate.

³ See, e.g., Vermont regulations, Section 3.308, Filing Requirements.

Residential Collections Reporting

1. **Total Number of Residential Customers** - number of accounts, categorized as follows: (i) By classification—residential, residential multi-unit dwellings. (ii) By usage—heating, nonheating. Report the number as of the end of the month. Report the number for each month of the year. Report each individually billed account under a unique residential account number and residential tariff rate (Count the number of residential bills that you issue). Include Bill Assistance⁴ program recipients.
2. **Annual Collections Operating Expenses** - Include administrative expenses associated with termination activity, field visits, negotiating payment arrangements, budget counseling, investigation and resolving informal and formal complaints associated with payment arrangements, securing and maintaining deposits, tracking delinquent accounts, collection agencies' expenses, litigation expenses other than already included, dunning expenses and winter survey expenses. Report the cumulative total as of the end of the year. Exclude Bill Assistance expenses.
3. **Annual Residential Billings** – Report the cumulative total dollar amount in residential billings during the year. This includes ‘Normal Tariff Billings’ and ‘Miscellaneous Billings.’ The latter category includes billings for Late Payment Fees.
4. **Total Dollar Amount of Gross Residential Write-Offs** - Report the cumulative total dollar amount as of the end of the year. *Note:* Do not include Bill Assistance Credits or Bill Assistance Arrearage Forgiveness in this category.
5. **Total Number of Active Residential Accounts in Arrears and Not on a Payment Agreement.** Report the total as of the end of the month. Report the number for each month of the year. The due date is considered to be day zero (0) in the determination of when account is overdue. Exclude Bill Assistance recipients. Further report numbers of active residential accounts overdue, categorized⁵ as follows:

⁴ “Bill Assistance” is used here as a placeholder for the name of a means-tested rate whereby a low-income customer’s bill is reduced to or towards an affordable level. Bill Assistance may be part of an overall effort to achieve Universal Service.

⁵ For categorization, *see, e.g.* PA Code § 56.231. Massachusetts also categorizes past due bills by vintage. Monthly reports required under the decision in docket DTE 05-086 require that the number and dollar value of past due accounts be broken out for those 60-90 days overdue, and those 90 plus days overdue. *See* Memorandum to Service List. Re: Monthly Reporting to Consumer Division Regarding Arrearage Management Programs, by the Hearing Officer, May 3, 2007, Docket DTE 05-86; available at <http://db.state.ma.us/dpu/qorders/frmDocketSingle.asp?docknum=05-86>. *See also*

- a. By usage—heating, nonheating.
 - b. By time overdue in days—
 - i. 30 days or less,
 - ii. 31—60 days,
 - iii. 61—90 days,
 - iv. 91—120 days, and
 - v. over 120 days.
 - c. By amount overdue:⁶
 - i. \$25 or less,
 - ii. \$26—\$50,
 - iii. \$51—\$150
 - iv. \$151—\$250,
 - v. \$251—\$500,
 - vi. \$501—\$1,000 and
 - vii. over \$1,000.
6. **Total Dollar Amount of Active Residential Accounts in Arrears and Not on a Payment Agreement.** Report the total amount as of the end of the month. Report the amount for each month of the year. The due date is considered to be day zero (0) in the determination of when account is overdue. Exclude Bill Assistance recipients. Further report amounts for active residential accounts overdue, categorized⁷ as follows:
- a. By usage: heating, nonheating, and further by:
 - b. Time overdue in days:
 - i. 30 days or less,
 - ii. 31—60 days,
 - iii. 61—90 days,
 - iv. 91—120 days, and
 - v. over 120 days.
7. **Total Number of Active Residential Accounts in Arrears and on a Payment Agreement.** Report the total as of the end of the month. Report the number for each month of the year. The due date is considered to be day zero (0) in the determination of when account is overdue. Exclude Bill Assistance recipients.

Pacific Power Washington Low-Income Data Tracking Report, April 2007, filed May 2, 2007, in compliance with *Washington Utilities and Transportation Commission Orders in WUTC v. PacifiCorp d/b/a Pacific Power & Light Company, etc.*, Docket Nos. UE-050684, and UE-050412, April 17, 2006, at paragraph 378.

⁶ See the Universal Service section, below, for a less granular set of dollar amounts for categorization.

⁷ *Id.*

8. **The Total Dollar Amount of Active Residential Accounts in Arrears and on a Payment Agreement.** Report the total dollar amount as of the end of the month. Report the dollar amount for each month of the year. The due date should be considered to be day zero (0) in the determination of when account is overdue. Exclude Bill Assistance recipients.
9. **The Total Number of Inactive Residential Accounts in Arrears.** An Inactive Account is defined as an account that has been terminated or discontinued, the final bill due date has passed, and the amount owed has not yet been written off. Report the total as of the end of the month. Report the number for each month of the year. The due date should be considered to be day zero (0) in the determination of when an account is overdue. A terminated or final-billed account becomes inactive on the day after the final bill is due and payable.
10. **The Total Dollar Amount of Inactive Residential Accounts in Arrears.** An Inactive Account is defined as an account that has been terminated or discontinued, the final bill due date has passed, and the amount owed has not yet been written off. Report the total dollar amount as of the end of the month. Report the dollar amount for each month of the year. The due date should be considered to be day zero (0) in the determination of when an account is overdue. A terminated or final-billed account becomes inactive on the day after the final bill is due and payable.
11. **Total number of termination notices sent out by company,** categorized as for non-payment or for other reason(s).
12. **Average monthly usage of customers for the preceding six (6) months, categorized by whether a termination notice was sent for non-payment.**
13. **Average monthly bill of customers for the preceding six (6) months, categorized by whether a termination notice was sent for non-payment.**
14. **Total number of dwellings which receive notices sent to ratepayers other than occupants.**
15. **Number of completed personal contacts,**⁸ categorized as follows:
 - a. In person.
 - b. By telephone.
 - c. By third-party notification to a person designated by the customer.
 - d. By third-party notification to a community interest group.
 - e. By third-party notification to the Commission or its designee.
16. **Total number of [48-hour] notices posted.**⁹

⁸ Where the utility is required to attempt an in-person contact before disconnection of service.

17. **Number of terminations completed**, categorized as follows:
 - a. Number of accounts terminated for nonpayment of undisputed delinquent accounts, failure to satisfy credit requirements, or noncompliance of a payment arrangement.
 - b. Others.

18. **Number of terminations completed**, categorized¹⁰ as follows:
 - a. By usage—heating, nonheating.
 - b. By amount overdue:
 - i. \$25 or less,
 - ii. \$26—\$50,
 - iii. \$51—\$150,
 - iv. \$151—\$250,
 - v. \$251—\$500,
 - vi. \$501—\$1,000 and
 - vii. over \$1,000.
 - c. By length of time overdue:
 - i. 30 days or less,
 - ii. 31—60 days,
 - iii. 61—90 days,
 - iv. 91—120 days, and
 - v. over 120 days.
 - d. By first three digits of each account's zip code.

19. **Number of reconnections within 15 days**,¹¹ categorized as follows:

⁹ Where the utility is required to notify the customer of an impending disconnection interimly before the disconnection. The identification of the type of notice should conform to the state requirements as to such last-chance notices.

¹⁰ For categorization, *see*, e.g. PA Code § 56.231. *See also* Memorandum to Service List. Re: Monthly Reporting to Consumer Division Regarding Arrearage Management Programs, by the Hearing Officer, May 3, 2007, Docket DTE 05-86; available at <http://db.state.ma.us/dpu/qorders/frmDocketSingle.asp?docknum=05-86>; and Pacific Power Washington Low-Income Data Tracking Report, April 2007, filed May 2, 2007, in compliance with *Washington Utilities and Transportation Commission Orders in WUTC v. PacifiCorp d/b/a Pacific Power & Light Company, etc.*, Docket Nos. UE-050684, and UE-050412, April 17, 2006, at paragraph 378.

¹¹ *See, e.g.*, Vermont regulations, Section 3.308, Filing Requirements. The State of Washington Low-Income Data Tracking Report defines reconnections after five (5) days as new customers, not reconnections, for reporting purposes. *See* Pacific Power Washington Low-Income Data Tracking Report, April 2007, filed May 2, 2007, in compliance with *Washington Utilities and Transportation Commission Orders in WUTC v. PacifiCorp d/b/a Pacific Power & Light Company, etc.*, Docket Nos. UE-050684, and UE-050412, April 17, 2006, at paragraph 378. When reviewing utility policies to avoid

- a. By usage—heating, nonheating.
 - b. By whether amortization settlement agreement was achieved:
 - i. With involvement of the Commission.
 - ii. Between the customer and utility.
 - c. By total number of the reconnections due to medical certification.
 - d. By total number of reconnections due to full payment of arrearage.
20. **The Total Number of Terminations for Non-Payment of Arrears as Defined by General or Utility-Specific Order, Tariff Terms and Conditions, Statute and/or Regulation** - The reason for termination is customer nonpayment of usage-based billings or nonpayment of a security deposit. Report the cumulative number as of the end of the month. Report the number for each month of the year. Include Bill Assistance program recipients.
21. **The Total Number of Terminations for Other Reasons as Defined by General or Utility-Specific Order, Tariff Terms and Conditions, Statute and/or Regulation** – The reasons for termination [list allowable “other” reasons here, e.g. “failure to permit access, unauthorized use of service, fraud, meter tampering, and safety”]. Report the cumulative number as of the end of the month. Report the number for each month of the year. Include Bill Assistance program recipients.
22. **The Total Number of Reconnections for Customer Payment** - A reconnection is any residential account that was terminated for any reason covered under [citation to authority to allow disconnection for non-payment¹²] and subsequently restored after meeting the utility’s terms for restoration if the terms for restoration included a customer payment and/or the establishment of a payment agreement. Include regardless of how much time has passed up to a limit of four years and regardless of whether the customer’s current status is that of applicant or ratepayer under [citation to authority]. Report the cumulative number as of the end of the month. Report the number for each month of the year. Report by each Income Level consistent with [defined Income Levels].¹³ Include Bill Assistance program recipients.

hardship during the winter of 2006-2007, Ohio required that length of disconnection be tracked as follows: (a) one week or less, (b) more than one week but less than 30 days, (c) between 30 days and 89 days, and (d) 90 or more days. *See* the special data request issued in Docket 06-1075-GE-UNC, on September 9, 2006.

¹² *E.g.*, general or utility-specific order, tariff terms and conditions, statute and/or regulation.

¹³ Means-tested programs or rates, such as Bill Assistance, often subdivide eligible customers by poverty level and provide different credits or discounts depending on the level of poverty. Such levels might be, e.g. percentages of the Federal Poverty Level or of the state or municipal median income.

23. **The Total Number of Reconnections for Customer Submission of Medical Certification** - This includes only reconnections that occur because the customer has supplied the company with a valid medical certificate as the condition of reconnection. Report the cumulative number as of the end of the month. Report the number for each month of the year. Report by each Income Level consistent with [defined Income Levels]. Include Bill Assistance program recipients.
24. **The Total Number of Reconnections for Reasons Other than Customer Payment or Medical Certification.** Customer payment includes the establishment of a payment agreement or payment in full. Report the cumulative number as of the end of the month. Report the number for each month of the year. Report by each Income Level consistent with [defined Income Levels]. Include Bill Assistance program recipients.
25. **Average duration of service disconnection for restored accounts.**¹⁴
26. **The Total Number of Applicants that Are Requested or Billed a Security Deposit.** Report the cumulative number as of the end of the month. Report the number for each month of the year.
27. **The Total Dollar Amount in Security Deposits that Are Requested or Billed to Applicants.** Report the cumulative total dollar amount as of the end of the month. Report the dollar amount for each month of the year.
28. **The Total Number of Customers that Are Requested or Billed a Security Deposit** - Report the cumulative number as of the end of the month. Report the number for each month of the year.
29. **The Total Dollar Amount in Security Deposits that Are Requested or Billed to Customers.** Report the cumulative total dollar amount as of the end of the month. Report the number for each month of the year.
30. **The Total Number of Security Deposits on-hand.** Report the number as of the end of the year.
31. **The Total Dollar Amount in Security Deposits on-hand.** Report the dollar amount as of the end of the year.

¹⁴ This requirement is drawn from the Massachusetts reporting requirements set out in the Memorandum to Service List. Re: Monthly Reporting to Consumer Division Regarding Arrearage Management Programs, by the Hearing Officer, May 3, 2007, Docket DTE 05-86; available at <http://db.state.ma.us/dpu/qorders/frmDocketSingle.asp?docknum=05-86>.

Universal Service Program Reporting

Energy Efficiency

1. **Program Costs (Actual Spending For the Reporting Period Just Completed)**
– This is the cumulative total dollars spent in the program as of the end of the year. This includes Administrative Costs.

Bill Assistance

1. **Program Costs: Administration** – Total administrative costs include the following: internal and contract staffing, outreach, intake verification, annual training, maintenance of telephone lines, recertification, evaluation, account monitoring, consumer education and conservation, and other routine fixed overhead costs, and computer programming. Include Bill Assistance collection, and Bill Assistance operation and maintenance expenses. Intake verification includes costs associated with all referrals and costs associated with those who fail to keep enrollment appointments. Include program evaluation costs. This is a cumulative total dollar amount as of the end of the year. Note: LIHEAP costs – Do not include LIHEAP costs in Bill Assistance costs, unless your company provides outreach to Bill Assistance recipients that is specifically targeted and different from outreach that your company conducts for non-Bill Assistance customers. In other words, if the outreach is the same, your company should include the cost as a LIHEAP administrative cost. Report this cost as a part of Other Low Income Program administration or collection costs.
2. **Program Costs: Bill Assistance Credits** – Total Bill Assistance credits include the total amount for all customers who received Bill Assistance credits, the difference between the standard billed amount and the Bill Assistance billed amount. For example, if an actual bill is \$100 and the Bill Assistance billed amount is \$30, the Bill Assistance credits equal \$70. Exclude Preprogram Arrearage Forgiveness reported above. Include third party payments, such as LIHEAP grants and hardship fund grants that reduce Bill Assistance Credits that are reflected in the calculation of the Bill Assistance Credit. This is a cumulative total dollar amount as of the end of the year.
3. **Program Costs: Preprogram Arrearage Forgiveness** – Total preprogram arrearages forgiven as a result of customers making agreed upon Bill Assistance payments. This is a cumulative total dollar amount as of the end of the year. Do not include cumulative arrearages from the beginning of Bill Assistance.

Collection Data for Confirmed Low-Income Customers¹⁵

1. Confirmed low-income customers are residential customers whose low income is known to the utility because of Bill Assistance participation, and also includes all customers with a code used for purposes of determining eligibility for the Weather-Related Termination protections¹⁶ (whether or not the customer actually applies for such protections), or whose sources of income, as known to the utility, include any of the following:
 - a. LIHEAP, the federal home energy assistance program for low-income customers (Low-Income Home Energy Assistance Program);
 - b. Temporary Assistance to Needy Families (TANF), the program formerly known as AFDC (Aid to Families with Dependent Children);
 - c. General Assistance;
 - d. Supplemental Security Income (gold card from the Social Security Administration).
 - e. Additional mechanisms to use in identifying “confirmed low-income customer” can be added either at the utility’s own initiative or upon application by other parties to the Board.

2. For all confirmed low-income customers, the utility shall provide monthly the following information:
 - a. The number of confirmed low-income customers;
 - b. The distribution of full retail bills;
 - c. The number of active accounts;
 - d. The number of discontinuance/termination notices;
 - e. The number of Arrearage Forgiveness Program¹⁷ notices;

¹⁵ The data proposed to be collected here were suggested by consumer expert Roger D. Colton, and here taken from his prefiled direct testimony on behalf of the New Jersey Division of the Ratepayer Advocate (now, Rate Counsel) in *I/M/O the Joint Petition of Public Service Electric & Gas Company and Exelon Corporation for Approval of a Change in Control of PSE&G Company, and Related Authorizations*, N.J. B.P.U. Docket EM05020106; November 14, 2005, at pp. 60-63, and Exhibit RDC-8. This testimony is available at: http://www.rpa.state.nj.us/PSEG_Exelon_Merger/EM05020106%20Roger%20Colton%20Testimony.pdf

¹⁶ A number of utilities in many states have protections against termination in the event of dangerous weather, including hot weather in the summer and cold weather in the winter. In most cases, the protections last for a defined season.

¹⁷ A number of utilities offer their low-income customers the opportunity to amortize the arrearages that they amassed before they applied for participation in bill

- f. The number of Arrearage Forgiveness Program final reminders;
- g. The number of telephone contacts between the utility and the low-income customer (broken out by inbound and outbound where data is available);
- h. The number of field visits;
- i. The number of terminations;
- j. The number of reconnections;
- k. The number of accounts charged off as uncollectible;
- l. The dollar amount of accounts charged off as uncollectible;
- m. The number of new payment arrangements;
- n. The number of overdue accounts by dollar level as follows:
 - i. \$1-\$100;
 - ii. \$101 - \$500
 - iii. \$501 - \$1000
 - iv. Over \$1000.
- o. The total dollars of overdue accounts by dollar level as follows:
 - i. \$1-\$100;
 - ii. \$101 - \$500
 - iii. \$501 - \$1000
 - iv. Over \$1000.
- p. The numbers of overdue accounts by payment status, as follows:
 - i. current
 - ii. 31 – 60 days
 - iii. 61 – 90 days
 - iv. 91 or more days
- q. The total dollars of overdue accounts by payment status, as follows:
 - i. current
 - ii. 31 – 60 days
 - iii. 61 – 90 days
 - iv. 91 or more days.

Other Low-Income Programs

1. **LIHEAP Outreach Program Costs** – This is the cumulative total amount spent to administer LIHEAP Outreach for the year. These costs can include LIHEAP outreach costs. LIHEAP costs – Do not include LIHEAP outreach costs in Bill Assistance costs, unless your company provides outreach to Bill Assistance recipients that is specifically targeted and different from outreach that your company conducts for non-Bill Assistance customers. In other words, if the outreach is the same, BCS requests your company to include the cost as a LIHEAP administrative cost. Report this cost as a part of LIHEAP Outreach Program administration or collection costs.

assistance. These program elements are known by different names. The term “Arrearage Forgiveness Program” is a placeholder for the name used by the utilities in the state.

2. **Hardship Program Costs – Administrative Costs only** – The cumulative total amount spent to administer the hardship fund as of the end of the year. This reporting category is limited to Administrative Costs from Rate Base.

Appendix E

Data Collection Requirements for Seven States

Citation	Item
<p>MAINE PUC c. 81, Section 1</p>	<p>A. <u>Purposes</u>. The purposes of this Chapter are:</p> <ol style="list-style-type: none"> 1. To assure safe and adequate provision of residential utility service; 2. To assure that service is not disconnected or refused unreasonably; and 3. To assure the utility's right to collect proper bills for residential utility service. <p>Every privilege that is granted and every duty that is required by this Chapter imposes an obligation on utilities, applicants and customers to accept these privileges and perform these duties with good faith, honesty and fairness.</p> <p>This Chapter defines the minimum standards for nondiscriminatory practices that all utilities must follow. It does not, however, limit the power of utilities to give greater protection to their customers above these minimum standards.</p>
<p>MAINE PUC c. 81, Section 16.A</p>	<p>A. <u>Record Maintenance</u>. All utilities must preserve records of disputes for a period of two (2) years and must keep these records within this State at an office or offices located in the territory served by it. The records must be available for examination by the Commission. The dispute records must include the following:</p> <ol style="list-style-type: none"> 1. the name and address of the applicant or customer with the dispute; 2. the date and subject matter of the dispute; 3. the record of investigation required by Section 13(B); 4. all communications to or from the customer regarding the dispute; 5. the adjustment or resolution offered to the customer; and 6. the final adjustment or resolution.

<p>MAINE c. 314 Statewide Low Income Assistance Program (LIAP)</p>	<p>D. Reports to Commission The MSHA⁵⁸ shall file reports annually with the Commission covering the program year October 1 through September 30. The reports shall be filed with the Commission by the immediately following January 1 and will be in an electronic data format satisfactory to the Commission and the MSHA. The reports shall summarize and update program information including at a minimum the following information for each quarter of the program year:</p> <ol style="list-style-type: none">1. Total Number of Participants The total number of households participating in each transmission and distribution utility's LIAP.2. Reimbursement to Utilities The amount reimbursed from the fund in response to each utility's statement of actual LIAP benefit amounts paid to eligible customers over the utility's assessment amount.3. Funds Received from Utilities The amount received from each utility, separately listing funds received to the "administrative account" and funds received to the "benefits account."4. Benefits Paid The amount of benefits paid by each transmission and distribution utility, as well as total benefits paid.5. Fund Information The amount of LIAP funds held by the MSHA, the interest earned by the fund, and projected spending for the pending program year.6. Oxygen Pump Benefit The number of customers receiving a benefit for the use of an oxygen pump pursuant to Section 4(K) of this Chapter, and the total amount of the benefits paid.7. Other Information Any other information concerning the administration and implementation of the LIAPs that the MSHA or the Commission believes would be useful for the Commission's ongoing oversight of funding levels and program design. <p>Reports filed by the MSHA pursuant to this section will be in an electronic data format satisfactory to the MSHA and the Commission.</p> <p>E. Record Maintenance The MSHA shall maintain records that include at least the following information:</p> <ol style="list-style-type: none">1. Number of Customers Evaluated The number of eligible customers evaluated for participation in the Statewide Low-Income Assistance Plan by each Community Action Agency or other entity authorized to determine eligibility for the applicable LIAPs.
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	<p>2. Income and Usage The household income, electric usage, and dollar amount of the annualized LIAP benefit (for LIAPs where this information is available) for each customer determined to be eligible by a Community Action Agency or other MSHA-designated entity, the date of such determination, and the identity of the transmission and distribution utility notified of the eligibility and benefit amount (for programs where this information is available).</p> <p>3. Oxygen Pump Benefit The number of customers receiving a benefit for the use of an oxygen pump pursuant to Section 4(K) of this Chapter.</p>
<p>Massachusetts Docket DTE 05-86</p>	<p>From Memorandum to Service List. Re: Monthly Reporting to Consumer Division Regarding Arrearage Management Programs, by the Hearing Officer, May 3, 2007, available at http://db.state.ma.us/dpu/qorders/frmDocketSingle.asp?docknum=05-86</p> <p>Monthly report:</p> <p>1) General Residential</p> <ul style="list-style-type: none"> a) Number of Residential Accounts, includes discount rate and Arrearage Management Program (AMP) accounts b) Total Billed c) Total Receipts d) Total Number of Protected Accounts <ul style="list-style-type: none"> i) Number of Accounts Protected for serious illness, infant, elderly ii) Number of Accounts Protected for financial hardship e) Number of Unpaid Accounts 60-90 Days after issuance of a bill f) Dollar Value of Unpaid Accounts 60-90 Days after issuance of a bill g) Number of Unpaid Accounts 90+ Days after issuance of a bill h) Dollar Value of Unpaid Accounts 90+ Days after issuance of a bill i) Total Number of Unpaid Accounts j) Total Dollar Value of Unpaid Accounts k) Number of warrants issued for non-payment l) Number of warrants issued for refusal of access m) Number of cases referred to collection agencies n) Number of new payments plans, not including AMP

	<ul style="list-style-type: none"> o) Number of new budget plans, not including AMP p) Number of Accounts Sent Notice of Disconnection for non-payment q) Number of Service Disconnections for non-payment r) Amount refunded or credited as a result of Consumer Division informal hearing or adjudicatory [individual customer contested case] s) Number of Service Restorations t) Average duration of service disconnection for restored accounts u) Number of Accounts Classified as Bad Debt v) Dollar Value of Accounts Classified as Bad Debt w) Dollar Value of Recovered Bad Debt
	<p>2) Low Income Discount Rate</p> <ul style="list-style-type: none"> a) Number of Accounts b) Total receipts c) Total receipts paid by LIHEAP d) Total number of customers receiving LIHEAP e) Total billed f) Number of Unpaid Accounts 60-90 Days after issuance of a bill g) Dollar Value of Unpaid Accounts 60-90 Days after issuance of a bill h) Number of Unpaid Accounts 90+ Days after issuance of a bill i) Dollar Value of Unpaid Accounts 90+ Days after issuance of a bill j) Total Number of Unpaid Accounts k) Total Dollar Value of Unpaid Accounts after issuance of a bill l) Number of Accounts Sent Notice of Disconnection m) Number of Service Disconnections for non-payment n) Number of Service Restorations for non-payment o) Number of Accounts Classified as Bad Debt p) Dollar Value of Accounts Classified as Bad Debt q) Amount of any Bad Debt Recovered
	<p>3) Arrearage Management Program</p> <ul style="list-style-type: none"> a) Number of Accounts (total enrollees in the program) b) Total receipts paid by enrollees c) Total receipts paid by LIHEAP d) Total down payments received to enroll in AMP e) Average amount of down payment f) Total billed to program participants, includes both arrears payment and current bill

	<ul style="list-style-type: none"> g) Number of newly enrolled customers h) Number of customers exited the program, other than successful completion i) Reason for exiting the program j) Number of customers successfully completing the program k) Number of Unpaid Accounts 60+ Days after issuance of a bill l) Dollar Value of Unpaid Accounts m) Number of program participants receiving LIHEAP n) Number of Accounts Sent Notice of Disconnection
<p>Minnesota Legislation</p>	<p>Sec. 11. [216B.091] MONTHLY REPORTS.</p> <p>(a) Each public utility must report the following data on residential customers to the commission monthly, in a format determined by the commission:</p> <ul style="list-style-type: none"> (1) number of customers; (2) number and total amount of accounts past due; (3) average customer past due amount; (4) total revenue received from the low-income home energy assistance program and other sources contributing to the bills of low-income persons; (5) average monthly bill; (6) total sales revenue; (7) total write-offs due to uncollectible bills; (8) number of disconnection notices mailed; (9) number of accounts disconnected for nonpayment; (10) number of accounts reconnected to service; and (11) number of accounts that remain disconnected, grouped by the duration of disconnection, as follows: <ul style="list-style-type: none"> (i) 1-30 days; (ii) 31-60 days; and (iii) more than 60 days. <p>(b) Monthly reports for October through April must also include the following data:</p> <ul style="list-style-type: none"> (1) number of cold weather protection requests; (2) number of payment arrangement requests received and granted; (3) number of right to appeal notices mailed to customers; (4) number of reconnect request appeals withdrawn; (5) number of occupied heat-affected accounts disconnected for 24 hours or more for electric and

	<p>natural gas service separately;</p> <p>(6) number of occupied non-heat-affected accounts disconnected for 24 hours or more for electric and gas service separately;</p> <p>(7) number of customers granted cold weather rule protection;</p> <p>(8) number of customers disconnected who did not request cold weather rule protection; and</p> <p>(9) number of customers disconnected who requested cold weather rule protection.</p> <p>(c) The data reported under paragraphs (a) and (b) is presumed to be accurate upon submission and must be made available through the commission's electronic filing system.</p>
<p>OHIO 06-1075-GE-UNC Order 9/606: Special Data Request – concern for customers disconnected in non-winter season. Appendix A Data required of all gas, natural gas, and electric light companies. Data for the months of October 2006 (starting October 16), November 2006, December 2006, January 2007, February 2007, March 2007 and April 2007 (through April 13, 2007) – data due 6/6/07</p>	<p>Columns</p> <p>1) Total number of residential customers who avoided disconnection, or re-established service using special reconnect procedures;</p> <p>2) Of those in Column one, only those customers that used special reconnection procedures to avoid disconnection;</p> <p>3) Of those in Column one, the number on PIPP [Percentage of Income Payment Plan – a burden based low-income bill assistance program];</p> <p>4) Of those in Column one, the number on one-third plan or one-sixth plan prior to disconnect;</p> <p>5) Of those in Column one, the number not on a payment plan prior to disconnect;</p> <p>6) Of those in column one, only those who signed up for PIPP at the time of reconect or disconnection avoidance, excluding customers already on PIPP;</p> <p>7) Of those in Column one, only those who signed up for the one-third or one-sixth payment plan at the time of reconnect or disconnect avoidance;</p> <p>8) Total dollar amount that would have been required for reconnection of customers in Column one absent the special reconnect procedures;</p> <p>9) Of the customers reconnected in Column one, the number disconnected for one week or less;</p> <p>10) Of the customers reconnected in Column one, the number disconnected for more than one week but less than 30 days;</p> <p>11) Of the customers reconnected in Column one, the number disconnected for 30 days but less than 90 days;</p> <p>12) Of the customers reconnected in Column one, the number disconnected for 90 days or more.</p>
<p>OHIO OSCAR Report</p>	<p>Ohio Statistics on Customer Accounts Receivable (OSCAR) [Columns: Column Number, Column Description, Counts, Totals]</p> <p>1. Customers</p>

1.01	The number of active residential customers.
1.02	The number of residential customers enrolled in an extended payment plan. These customers will be referred to as 'Active' PIPP customers.
1.03	The dollar amount of arrearages of active PIPP customers.
1.04	The number of residential customers on an extended payment plan described in paragraph (A) of rule 490 1-1-1804 of the Administrative Code
1.05	The dollar amount of arrearages of customers on plans in Column 1.04
1.06	The number of active residential customer accounts in arrears by more than 60 days.
1.07	The dollar amount of arrearages in Column 1.06
2.	PIPP Participation
2.01	Of the customers in Column 1.02, the number who used the service as a primary heating source.
2.02	Of the customers in Column 1.02, the number who used the service as a secondard heat source.
2.03	Of the customers in Column 1.02, the number who have continuously remained on PIPP during the preceeding 12months. Referred to 'Continuous' PIPP.
2.04	Of the customers in 1.02, the number who are new PIPP customers enrolled since the end of the preceding reporting period.
2.05	Of the customers in 1.02, the number who have been on PIPP at some point, but not continuously, within thepreceding 12 months.
3	Status of PIPP Customers
3.01	The number of customers who were on the PIPP plan described in paragrah (B) of rule 490 1:18-04 who are notcurrently enrolled as PIPP customers and who a have a deferred PIPP balance. These customers will be referred to as 'Inactive' PIPP customers.
3.02	The number of inactive or active PIPP customers who are not currently receiving service from UTILITY. These customers will be referred to as 'Final' PIPP customers.
3.03	Of the customers in Column 3.01, the number resulting from income ineligibility.
3.04	Of the customers in Column 3.01, the number resulting from failure to comply with specified reverification procedures.
3.05	Of the customers in Column 3.01, the number falling into categories not specified in Columns 3.03 - 3.04.
3.06	Of those in Column 3.02, the number resulting from non-payment disconnections.
3.07	The number of customers at or below 50% of the federal poverty level paying three percent for the secondary source of

	heat.
3.08	The number of customers participating in the PIPP balanced payment plan.
3.09	The number of customers who are in the first 12 months of the arrearage credit program.
3.10	The number of customers who are in the second 12 months of the arrearage credit program.
3.11	The number of customers who are in the final 12 months of the arrearage credit program.
4.	Arrearages
4.01	The amount of deferred PIPP arrears of active PIPP customers (in Column 1.02).
4.02	The amount of deferred PIPP arrears of inactive PIPP customers (in Column 3.01).
4.03	The amount of total PIPP arrears of final PIPP customers (in Column 3.02).
4.04	The cumulative amount of PIPP rider charges billed by UTILITY.
4.05	The cumulative amount of PIPP arrearages eligible for recovery through the PIPP Rider mechanism.
5.	PIPP Arrearages
5.01	The number of active PIPP accounts with PIPP credit balances.
5.02	The number of active PIPP accounts with total PIPP arrearages in amounts of \$0 - \$499.99.
5.03	The number of active PIPP accounts with total PIPP arrearages in amounts of \$500 - \$999.99.
5.04	The number of active PIPP accounts with total PIPP arrearages in amounts \$1,000 - \$2,499.99.
5.05	The number of active PIPP accounts with total PIPP arrearages greater than \$2,499.99.
5.06	The number of inactive PIPP accounts with deferred PIPP arrearages in amounts of \$1.00 - \$499.99.
5.07	The number of inactive PIPP accounts with deferred PIPP arrearages in amounts of \$500 - \$999.99.
5.08	The number of inactive PIPP accounts with deferred PIPP arrearages in amounts of \$1,000 - \$2,499.99.
5.09	The number of inactive PIPP accounts with deferred PIPP arrearages greater than \$2,499.99.
5.10	The number of final PIPP accounts with PIPP arrearages of \$0 - \$499.99.
5.11	The number of final PIPP accounts with PIPP arrearages in amounts of \$500 - \$999.99.
5.12	The number of final PIPP accounts with PIPP arrearages in amounts of \$1,000 - \$2,499.99.
5.13	The number of final PIPP accounts with PIPP arrearages greater than \$2,499.99.

6.	Pre-PIPP Arrearages
6.01	The number of new PIPP customers whose Pre-PIPP arrearage is \$0.
6.02	The number of new PIPP customers whose Pre-PIPP arrearage is \$0.01 - \$499.99.
6.03	The number of new PIPP customers whose Pre-PIPP arrearage is \$500 - \$999.99.
6.04	The number of new PIPP customers whose Pre-PIPP arrearages is greater than \$999.99.
7.	PIPP Payments
7.01	The amount of payments, excluding agency payments, made by active PIPP customers.
7.02	The amount of payments, excluding agency and arrearage crediting payments, made by inactive PIPP customers.
7.03	The amount of payments, excluding agency and arrearage crediting payments, made by final PIPP customers.
7.04	The amount of PIPP payments billed to active PIPP customers.
8.	Residential Disconnections
8.01	The number of residential accounts disconnected for nonpayment (Column 8.01 = Sum of (Columns 8.02 - 8.04)).
8.02	The number of residential accounts disconnected for nonpayment on the extended payment plan under Paragraph (B) of rule 4901:1-18-04 of the Administrative Code.
8.03	The number of residential accounts disconnected for nonpayment on the extended payment plan under paragraph (A) of rule 4901:1-18-04 of the Administrative Code.
8.04	The number of residential accounts disconnected for nonpayment which were not on any of the extended payment plans in Column 8.02 or 8.03.
9.	Arrearages at Time of Disconnect
9.01	The dollar amount that triggers the disconnections in Column 8.01 (Column 9.01 = total of Columns 9.02 - 9.04).
9.02	The dollar amount that triggers the disconnections in Column 8.02.
9.03	The dollar amount that triggers the disconnections in Column 8.03.
9.04	The dollar amount that triggers the disconnections in Column 8.04.
10.	Notices and Deposits
10.01	The number of disconnection notices issued for service disconnection for nonpayment for residential customers as described in Paragraph (A) of Rule 4901:1-18-05 of the Administrative Code.
10.02	The dollar amount represented by the disconnection notices in Column 10.01.
10.03	The number of security deposits received from residential

	customers.
10.04	The dollar amount of the security deposits in Column 10.03.
10.05	The number of security deposits received from active and inactive PIPP customers.
10.06	The dollar amount of the security deposits in Column 10.05.
11.	Reconnections
11.01	The number of residential nonpayment disconnect reconnections.
11.02	Of the residential customers disconnected, the number reconnected within one week.
11.03	Of the residential customers disconnected, the number reconnected after one week but within four weeks.
11.04	Of the residential customers disconnected, the number reconnected after four weeks.
11.05	The number of active PIPP customer nonpayment disconnect reconnections.
11.06	Of the active PIPP customers disconnected, the number reconnected within one week.
11.07	Of the active PIPP customers disconnected, the number reconnected after one week but within four weeks.
11.08	Of the active PIPP customers disconnected, the number reconnected after four weeks.
12.	Uncollectibles
12.01	The number of residential accounts classified as uncollectible.
12.02	Of the residential uncollectibles, the number of uncollectible accounts on an extended payment plan.
12.03	Of the residential uncollectibles, the number of uncollectibles on PIPP.
12.04	Of the residential uncollectibles, the number of uncollectibles on other extended payment plans.
12.05	Of the residential uncollectibles, the number of uncollectible accounts who were not on any extended payment plans in Columns 12.02, 12.03, or 12.04.
12.06	The dollar amount of residential uncollectible accounts in Column 12.01.
12.07	The dollar amount of uncollectibles in Column 12.02.
12.08	The dollar amount of uncollectibles in Column 12.03.
12.09	The dollar amount of uncollectibles in Column 12.04.
12.10	The dollar amount of uncollectibles in Column 12.05.
13.	Arrearage Crediting Program
13.01	The number of customers on the arrearage crediting program.
13.02	The average deferred PIPP balance of those in Column 13.01 at year zero.
13.03	The standard deviation of the deferred PIPP amount for the inactive PIPP arrearage crediting population at year zero.
13.04	The standard deviation of the deferred PIPP amount for the

	<p>inactive PIPP arrearage crediting population at the end of year two.</p> <p>13.05 The standard deviation of the deferred PIPP amount for the inactive PIPP arrearage crediting population at the end of year three</p> <p>13.06 The number of final PIPP customers making arrearage component payments.</p> <p>14. Monthly Customer Usage</p> <p>14.01 The average KWH usage for customers in Column 2.01.</p> <p>14.02 The average KWH usage for customers in Column 2.02.</p> <p>14.03 The average KWH usage for all heating non-PIPP active residential customers.</p> <p>14.04 The average KWH usage for all non-heating non-PIPP active residential customers.</p> <p>14.05 The average KWH usage for PIPP customers on the PIPP Balanced Payment Plan.</p> <p>14.06 The average MCF usage for natural gas PIPP customers.</p> <p>14.07 The average MCF usage for natural gas Non-PIPP residential heating customers.</p>
<p>Pennsylvania Code § 56.231</p>	<p>Within 15 days after the end of each month, each electric, gas and steam heat utility shall file with the Commission a report containing the following information for that month:</p> <p>(1) Total number of accounts, categorized as follows:</p> <ul style="list-style-type: none"> (i) By classification—residential, residential multi-unit dwellings. (ii) By usage—heating, nonheating. <p>(2) Number of overdue accounts, categorized as follows:</p> <ul style="list-style-type: none"> (i) By usage—heating, nonheating. (ii) By amount overdue— <ul style="list-style-type: none"> \$25 or less, \$26—\$50, \$51—\$150, \$151—\$250, \$251—\$500, \$501—\$1,000 and Over \$1,000. (iii) By time overdue in days— <ul style="list-style-type: none"> 30 days or less, 31—60 days, 61—90 days, 91—120 days, and Over 120 days. <p>(3) Dollar amount overdue, categorized as follows:</p> <ul style="list-style-type: none"> (i) Total amount of arrearages. (ii) By usage—heating, nonheating. (iii) By time overdue in days—

	<p style="text-align: center;">30 days or less, 31—60 days, 61—90 days, 91—120 days, and Over 120 days.</p> <p>(4) Total number of ten-day termination notices sent out by company.</p> <p>(5) Total number of dwellings which receive notices sent to ratepayers other than occupants.</p> <p>(6) Number of completed personal contacts categorized as follows:</p> <ul style="list-style-type: none"> (i) In person. (ii) By telephone. (iii) By third-party notification to a person designated by the customer. (iv) By third-party notification to a community interest group. (v) By third-party notification to the Commission or its designee. <p>(7) Total number of 48-hour notices posted.</p> <p>(8) Number of terminations completed by the company, categorized as follows:</p> <ul style="list-style-type: none"> (i) Number of nonpayment of undisputed delinquent accounts, failure to satisfy credit requirements, noncompliance in the settlement of amortization agreement. (ii) Others. <p>(9) Number of terminations completed, categorized as follows:</p> <ul style="list-style-type: none"> (i) By usage—heating, nonheating. (ii) By amount overdue— <ul style="list-style-type: none"> \$25 or less, \$26—\$50, \$51—\$150, \$151—\$250, \$251—\$500, \$501—\$1,000 and Over \$1,000. (iii) By length of time overdue— <ul style="list-style-type: none"> 30 days or less, 31—60 days, 61—90 days, 91—120 days, and Over 120 days. (iv) By first three digits of each account’s zip code. <p>(10) Reconnections, categorized as follows:</p> <ul style="list-style-type: none"> (i) By usage—heating, nonheating. (ii) By whether amortization settlement agreement was
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	<p>achieved:</p> <p>(A) With involvement of the Commission.</p> <p>(B) Between the customer and utility.</p> <p>(iii) By total number of the reconnections due to medical certification.</p> <p>(iv) By total number of reconnections due to full payment of arrearage.</p>
<p>VERMONT 3.308 Filing Requirements</p>	<p>(B) All gas, electric and telephone utilities subject to this rule shall file monthly with the Board, on a form provided by the Board, a statement reporting the following information regarding residential service for the previous month:</p> <ul style="list-style-type: none"> • The number of bills forwarded to ratepayers, • The number of disconnection notices sent, • The number of actual disconnections, • The number of reconnections made within 15 days of disconnection, • The number of repayment plans entered into, • The number of repayment plans that were broken, and • The dollar amount of delinquencies for which disconnections were made. <p>(C) Companies that fail to file information required in Section 3.308(B) within six months of the month being reported shall be precluded from disconnecting any residential customers.</p>
<p>Washington State Utility: Low-Income Data Tracking Report</p>	<p>All data provided monthly, and broken out by non-low-income and low-income (low-income defined as those who received energy assistance and/or received service on the low-income rate Schedule 17 within the past 12 months):</p> <ol style="list-style-type: none"> 1. Agreements (#) [agreements are individually metered electric service active during any portion of the report month. Customers can have multiple agreements on an account. Customer can also have multiple accounts.] 2. Disconnects for non-payment (#) 3. Reconnects for non-payment (#) [Reconnects in this month can be for disconnects which occurred in the last week of the prior month. Reconnects include only those where payments to reconnects are provided within 5 working days. Customers making payments after 5 working days are treated as new connects and are not included in this report. Also, a customer claiming prior obligation receives a new account number and is not included as a reconnect.] 4. Agreements with arrears (#) 5. Total arrears amount (\$) 6. Termination notices (#) 7. Average age of arrears: (#) [Arrears and the number of agreements in arrears are based on a snapshot 2 days prior to the report date. Arrears are included on agreements that are

	<p>active during any portion of the report.]</p> <ul style="list-style-type: none">a. Agreements with arrears GT 30 daysb. Agreements with arrears GT 60 daysc. Agreements with arrears GT 90 days <p>8. TPP and ETP payment plans (#) [TPPs are time payment plans where the current months bill and an installment on the arrears is due monthly. ETPs are equal time plans where an average months bill and an installment on the arrears is due monthly.]</p> <p>9. Active and completed TPPs and ETPs (#) [Deposits for reconnect are charged within the report month. A deposit for the service may have already existed due to previous collection activity or unpaid balances at the time of connection.]</p> <p>10. Discontinued TPPs and ETPs (#)</p> <p>11. Deposits for reconnect (#)</p> <p>12. Average amount of deposits for reconnect (\$)</p> <p>13. Average hours to reconnect (#) [Average hours to reconnect is the average time that service was off and is not a measurement of time from payment to reconnection.]</p> <p>14. Medical certificates (#)</p>
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