**SAMPLE DATA REQUESTS**

**(from consumer advocates to an investor-owned utility,**

**in a state utility commission proceeding)**

1. With respect to General Residential Customers, please provide by zip code in executable spreadsheet format monthly figures by zip code since [most recent 36 months] for each of the data points listed below:
   1. Total number of accounts
   2. Total billing
   3. Total receipts
   4. Total number of “Protected Accounts”
      1. For Protected Accounts, please disaggregate by reason for protection (e.g., financial hardship, serious illness, disability or age status, etc.)
   5. Number of unpaid accounts 60-90 days after issuance of a bill
   6. Dollar value of unpaid accounts 60-90 days after issuance of a bill
   7. Number of unpaid accounts 90+ days after issuance of a bill
   8. Dollar value of unpaid accounts 90+ days after issuance of a bill
   9. Total number of unpaid accounts
   10. Total dollar value of unpaid accounts
   11. Number of accounts referred to collection agencies
   12. Number of new payment agreements entered into
   13. Average duration of new payment agreements entered into
   14. Number of payment agreements successfully completed
   15. Number of new budget or levelized plans entered into
   16. Number of accounts sent a notice of disconnection for non-payment
   17. Number of service disconnections for non-payment
   18. Ratio of service disconnections for nonpayment to total Residential Customers
   19. Number of service restorations
   20. Average duration of service disconnection for restored accounts
   21. Number of accounts classified as Bad Debt
   22. Dollar value of accounts classified as Bad Debt
   23. Dollar value of recovered Bad Debt
   24. Total number of customers charged a late payment fee
   25. Dollar value of late payment fees charged
2. With respect to Low-income Residential Customers (defined here as customers who participate in the Low Income Home Energy Assistance Program, the Weatherization Assistance Program, any ratepayer-funded bill payment assistance or arrearage management program, or any low-income ratepayer-funded energy efficiency or DSM program[[1]](#footnote-1)), please provide by zip code in executable spreadsheet format monthly figures by zip code since [most recent 36 months] for each of the data points listed below:
   1. Total number of accounts
   2. Total billing
   3. Total receipts
   4. Total number of Protected Accounts
      1. For Protected Accounts, please disaggregate by reason for protection (e.g., financial hardship, serious illness, disability or age status, etc.)
   5. Number of unpaid accounts 60-90 days after issuance of a bill
   6. Dollar value of unpaid accounts 60-90 days after issuance of a bill
   7. Number of unpaid accounts 90+ days after issuance of a bill
   8. Dollar value of unpaid accounts 90+ days after issuance of a bill
   9. Total number of unpaid accounts
   10. Total dollar value of unpaid accounts
   11. Number of accounts referred to collection agencies
   12. Number of new payment agreements entered into
   13. Average duration of new payment agreements entered into
   14. Number of payment agreements successfully completed
   15. Number of new budget or levelized plans entered into
   16. Number of accounts sent a notice of disconnection for non-payment
   17. Number of service disconnections for non-payment
   18. Ratio of service disconnections for nonpayment to total Residential Customers
   19. Number of service restorations
   20. Average duration of service disconnection for restored accounts
   21. Number of accounts classified as Bad Debt
   22. Dollar value of accounts classified as Bad Debt
   23. Dollar value of recovered Bad Debt
   24. Total number of customers charged a late payment fee
   25. Dollar value of late payment fees charged Please provide a copy of the most recent cost justification for the late payment charge imposed by the Company as filed with any state utility regulatory body.
3. Please provide a copy of the most recent, unredacted testimony, exhibits, and workpapers filed in support of the Company’s current late payment charge filed with any state utility regulatory body.
4. Please provide the most recent utility regulatory commission decision approving the late payment fee of the Company.
5. Please provide all criteria for assessing the effectiveness of the Company’s credit and collection activities.
6. Please provide all criteria for assessing the cost-effectiveness of the Company’s credit and collection activities.
7. Please provide a single copy of all reports, studies, memorandums or written documents of any nature prepared since January 1, 2015 assessing either the effectiveness or the cost-effectiveness of the Company’s credit and collection activities.
8. Please provide all studies, analyses, memos, workpapers, or written documents of any nature that disaggregate the source of Bad Debt to the Company by the following:
   1. Customer class;
   2. Geography (*e.g.*, zip code, census block, etc.) (for residential Bad Debt);
   3. Socio-economic status of the customer (for residential Bad Debt).
9. Please provide all studies, analyses, memos, workpapers, or written documents of any nature that disaggregate the source of arrears to the Company by the following:
   1. Customer class;
   2. Geography (*e.g.*, zip code, census block, etc.) (for residential arrears);
   3. Socio-economic status of the customer (for residential arrears).
10. Please provide the most recent regulatory decision, regulatory provisions and statutory provisions addressing the Company’s approved residential security deposits.
11. Please provide the studies or analyses in the Company’s possession linking the payment of security deposits with timely payment of current bills.
12. Please provide all written studies currently within the custody or control of the Company, whether or not prepared by or for the Company, that explicitly assess the extent to which the following individual activities reduce/s residential Bad Debt:
    1. Cash security deposits;
    2. Deferred payment agreements;
    3. Disconnections for nonpayment;
    4. Field collections;
    5. Call center collection calls;
    6. Late payment charges.
13. Please provide all written studies currently within the custody or control of the Company, whether or not prepared by or for the Company, that explicitly assess the extent to which the following individual activities reduce/s residential arrears:
    1. Cash security deposits;
    2. Deferred payment agreements;
    3. Disconnections for nonpayment;
    4. Field collections;
    5. Call center collection calls;
    6. Late payment charges.
14. Please provide by month for each month January 2017 to present, the following:
    1. The total number of accounts on which residential deposits are held;
    2. The total dollars of residential deposits held;
    3. The total number of residential deposits refunded;
    4. The total dollars of residential deposits refunded;
    5. The total number of residential deposits applied against an account; and
    6. The total dollars of residential deposits applied against an account.
15. With respect to residential security deposits, please provide the following information:
    1. Protocols used to determine the amount of the deposit
    2. The extent to which the Company uses a customer’s credit score to
       1. determine the amount of the security deposit
       2. whether to require a security deposit
    3. Whether the deposit amount is the same for all residential customers
    4. Whether any residential customers over the past three years have had security deposit amounts reduced or waived.
16. To the extent not already provided in the responses to the above requests, please provide all reports, memoranda, presentations, or other documents provided to stockholders, investors, banks, investment firms, investment brokers or dealers, investment analysts, bond rating agencies from [Utility Name] between 2017 and 2020 (inclusive) in which the matters addressed in the above Requests 1.1 – 1.16 were discussed in any way.

1. *This sample data request is from an energy utility rate case. Definitions can be adapted for a water utility.* [↑](#footnote-ref-1)