

INDEPENDENT INTERVENOR EXHIBIT-1
UTILITY CUSTOMERS IN ARREARS

Safety Valve Evaluation of Customers in Arrears

This exhibit documents an analysis of residential customer in arrears data to estimate whether there has been a significant increase in arrears consistent with New York Public Service Law § 66-p (4) for the ten largest electric and gas distribution utility companies regulated by the Public Service Commission. The spreadsheet used for the calculations is available as Exhibit 2. The first tab in the spreadsheet describes the other tabs in the spreadsheet.

Residential Collection Data

Utilities file a monthly report in the PSC Case 91-M-0744 docket that details their arrears and service terminations. There is a data set in New York Open Data¹ that provides this information that can be used to determine the number of residential customers in arrears. The “Quarterly snapshot of residential collection dataset”² contains the following information:

This dataset provides a quarterly snapshot of residential bill collection activity for New York State’s ten largest electric and gas distribution utility companies regulated by the Public Service Commission. Included in this dataset are each utility’s total number of residential customers, residential customers with arrears (overdue bills) greater than 60 days, residential final service termination notices issued, residential accounts terminated (service shut off for nonpayment), active residential deferred payment agreements and the number of uncollectible residential accounts. Also included are the

¹ <https://data.ny.gov/>

² https://data.ny.gov/Energy-Environment/Key-Credit-Collection-Beginning-2010/kdjh-dhwi/about_data

corresponding utility sales figures for each metric above, showing the dollar figure represented.

The “Documentation” tab in the Exhibit 2 spreadsheet lists the Data Dictionary in the New York Open Data source record. For this analysis, the data were exported in February 2026 to the “Input” tab in the spreadsheet. The original data is available by quarter, but the data labels are listed as month and year, so the input data is converted to quarterly labels in the “Quarterly” tab. The “Statewide” tab summarizes data for all the utilities by quarter.

Company Residential Customer Summary - Quarterly Data

Table 1 lists the quarterly data for the Summary Snapshot for all ten utilities for the total number of residential customers, residential customers with arrears (overdue bills) greater than 60 days, and the percentage of residential customers with overdue bills relative to the total number of customers. Note that the “Table 1” tab in Exhibit 2 is the source of the data. The final termination notices and number of service disconnections (not shown) are not good estimates of the effect of the CLCPA because other mandates have affected the data, e.g., service disconnections were suspended during COVID.

The annual average number of customers in arrears greater than 60 days was 1,040,664 in 2019 the last year before the CLCPA was implemented and the average in 2025 was 1,255,298 customers in arrears which is an increase of 214,634 or a 21% increase.

The Public Safety Law section 66-p (4) criteria for consideration of suspension or modification is a “significant increase in arrears or service disconnections that the commission determines is related to the program”. The standard deviation of the number of customers in arrears from 2010 to 2019 is

64,333. Because the observed difference, 214,634 is greater than two times the standard deviation the increase is statistically “significant”.

Table 1: Ten Largest Electric and Gas Distribution Utilities Summary Snapshot Quarterly Residential Collection Data

Year	Qtr	Residential Customers	Customers with Arrears Greater than 60 Days	Final Termination Notices Issued	Accounts Terminated	Active Payment Arrangements	Residential Sales	
2010	1	8,284,156	883,874	580,011	18,355	402,523	\$ 1,104,123,945	201003
2010	2	8,260,880	918,622	555,886	41,783	434,649	\$ 732,055,632	201006
2010	3	8,271,714	910,474	626,237	33,192	451,130	\$ 769,481,947	201009
2010	4	8,265,363	967,417	564,845	5,907	442,381	\$ 1,030,456,443	201012
2011	1	8,301,369	909,213	659,874	17,200	442,623	\$ 1,114,823,083	201103
2011	2	8,304,794	954,651	616,252	31,498	458,767	\$ 743,434,625	201106
2011	3	8,303,149	958,796	650,311	25,438	453,960	\$ 773,308,046	201109
2011	4	8,275,533	978,563	578,020	8,360	438,576	\$ 893,731,864	201112
2012	1	8,288,848	908,317	593,885	16,470	418,197	\$ 924,408,565	201203
2012	2	8,283,316	917,058	545,265	29,151	401,842	\$ 696,121,606	201206
2012	3	8,290,961	899,261	573,208	28,558	382,478	\$ 793,046,329	201209
2012	4	8,261,950	1,051,070	466,085	5,610	378,549	\$ 905,789,374	201212
2013	1	8,285,370	945,730	564,221	12,707	407,695	\$ 1,018,723,386	201303
2013	2	8,310,777	1,000,328	548,657	29,324	436,706	\$ 734,423,058	201306
2013	3	8,312,047	967,611	605,921	28,116	439,798	\$ 772,838,775	201309
2013	4	8,275,235	990,961	597,270	5,671	418,395	\$ 1,024,151,192	201312
2014	1	9,370,899	1,068,047	615,449	12,245	462,364	\$ 1,466,148,780	201403
2014	2	9,375,544	1,174,551	587,996	40,699	512,686	\$ 891,113,096	201406
2014	3	9,331,341	1,124,110	610,031	32,948	509,493	\$ 950,795,368	201409
2014	4	9,394,656	1,094,422	582,662	8,997	448,704	\$ 1,126,101,554	201412
2015	1	9,429,328	1,015,960	588,301	12,095	417,228	\$ 1,321,012,993	201503
2015	2	9,553,682	1,086,924	545,263	39,563	426,509	\$ 820,653,634	201506
2015	3	9,461,076	1,037,652	573,308	27,992	418,341	\$ 1,015,247,804	201509
2015	4	9,441,195	1,064,225	545,103	8,735	403,891	\$ 997,612,139	201512
2016	1	9,469,318	985,715	554,698	17,321	379,136	\$ 1,035,516,588	201603
2016	2	9,498,004	1,033,334	526,673	35,107	373,290	\$ 826,631,297	201606
2016	3	9,515,762	997,656	589,632	29,619	381,831	\$ 958,773,904	201609
2016	4	9,515,313	1,059,982	506,790	7,276	384,923	\$ 1,029,789,693	201612
2017	1	9,557,068	991,256	568,169	10,473	397,352	\$ 1,144,696,104	201703
2017	2	9,575,342	1,030,479	552,293	29,327	404,882	\$ 868,173,973	201706
2017	3	9,582,696	1,020,621	562,691	25,832	388,064	\$ 932,643,607	201709
2017	4	8,748,022	1,036,611	524,516	4,954	361,556	\$ 1,108,517,346	201712
2018	1	9,626,437	992,341	615,355	6,205	367,159	\$ 1,250,506,429	201803
2018	2	9,674,261	1,034,869	564,984	27,214	378,948	\$ 913,497,657	201806
2018	3	9,684,527	1,020,696	570,957	22,678	375,385	\$ 1,136,824,122	201809
2018	4	9,699,700	1,051,354	508,086	4,664	374,159	\$ 1,244,882,192	201812
2019	1	9,729,955	1,008,231	570,719	9,912	376,496	\$ 1,240,547,744	201903
2019	2	9,751,649	1,068,893	491,619	33,481	383,256	\$ 838,073,764	201906
2019	3	9,692,477	1,039,312	550,879	31,613	375,916	\$ 991,158,694	201909
2019	4	10,037,055	1,046,219	504,843	3,934	348,707	\$ 1,144,394,276	201912

Customers with Arrears Greater than 60 Days	
64,333	Standard Deviation 2010-2019
1,040,664	2019 average
1,255,298	2025 average
214,634	Difference 2019 and 2025
128,665	Two deviations Significant

**Table 1, continued: : Ten Largest Electric and Gas Distribution Utilities
Summary Snapshot Quarterly Residential Collection Data**

2020	1	9,775,065	1,063,585	455,940	7,349	330,303	\$ 1,172,754,335	202003
2020	2	9,774,518	1,210,717	221,226	0	261,194	\$ 1,020,612,820	202006
2020	3	9,761,730	1,197,277	224,610	0	230,294	\$ 1,047,133,009	202009
2020	4	9,768,444	1,263,742	186,894	0	227,932	\$ 1,301,386,859	202012
2021	1	9,782,933	1,236,492	211,900	0	235,004	\$ 1,352,857,056	202103
2021	2	9,836,221	1,293,548	196,076	0	238,136	\$ 1,100,790,537	202106
2021	3	9,895,239	1,285,560	348,984	0	269,028	\$ 1,192,343,179	202109
2021	4	9,911,162	1,289,992	439,115	0	276,539	\$ 1,437,618,166	202112
2022	1	9,981,858	1,237,766	658,585	131	321,966	\$ 1,623,971,086	202203
2022	2	9,930,117	1,321,155	484,024	11,746	343,018	\$ 1,169,274,939	202206
2022	3	9,988,821	1,312,977	505,408	14,573	358,283	\$ 1,410,988,407	202209
2022	4	9,980,661	1,362,135	470,744	4,535	359,925	\$ 1,662,909,087	202212
2023	1	10,053,700	1,326,611	548,764	2,165	402,293	\$ 1,642,740,611	202303
2023	2	10,036,704	1,388,011	489,204	31,319	409,925	\$ 1,079,595,126	202306
2023	3	10,054,219	1,351,031	514,620	29,550	402,589	\$ 1,263,932,317	202309
2023	4	9,959,980	1,412,496	298,780	815	400,957	\$ 1,623,227,697	202312
2024	1	10,070,178	1,372,729	646,198	3,963	389,786	\$ 1,651,664,471	202403
2024	2	10,091,744	1,401,387	684,528	24,291	444,386	\$ 1,215,429,025	202406
2024	3	10,127,588	1,382,880	546,295	34,859	467,700	\$ 1,199,225,183	202409
2024	4	10,109,528	1,383,480	462,130	8,937	454,124	\$ 1,814,235,666	202412
2025	1	10,185,012	1,241,779	471,107	21,330	458,553	\$ 1,889,026,620	202503
2025	2	10,162,937	1,266,339	430,898	42,048	503,409	\$ 1,404,013,426	202506
2025	3	10,195,364	1,224,792	444,855	53,593	514,953	\$ 1,472,738,675	202509
2025	4	10,215,948	1,288,281	432,428	11,663	491,390	\$ 2,087,394,739	202512

There are ten tables in the Attachment 2 spreadsheet in a similar format but only include data from each of the ten largest utility companies that are included in the New York Open Data quarterly snapshot of residential collection data. Table 2 summarizes the results listed in the PSL 66-p(4) tab in the spreadsheet. In addition to the statewide significance finding, four of the ten utilities had a statistically significant increase in customers in arrears since the start of the CLCPA: Consolidated Edison, Central Hudson Gas & Electric, National Grid Metro - Natural gas to Brooklyn, Queens, and Staten Island, and National Grid Upstate: the former Niagara Mohawk service territory.

Table 2: Summary of Analyses of Customers in Arrears More Than 60 Days

Was the difference between the annual average of the customers in arrears more than 60 days in 2019 and 2025 greater than two standard deviations of the 2011- 2019 data?

CE: Consolidated Edison	Significant
PSEG: Public Service Enterprise Group	Significant
CH: Central Hudson Gas & Electric	Significant
NGrid-LI: National Grid Long Island - Natural Gas and power plants	Not significant
NGrid-NY: National Grid Metro - Natural gas to Brooklyn,, Queens, and Staten Island	Not significant
NGrid-Upstate: Niagara Mohawk	Significant
OR: Orange & Rockland	Not significant
NYSEG: New York State Electric and Gas	Not significant
RG&E: Rochester Gas & Electric	Not significant
NFG: National Fuel Gas - Natural Gas	Not Significant
Statewide	Significant