

# **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 Data<sup>1</sup> that provides this information that can be used to determine the number of residential customers in arrears. The “Quarterly snapshot of residential collection dataset”<sup>2</sup> 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

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<sup>1</sup> <https://data.ny.gov/>

<sup>2</sup> [https://data.ny.gov/Energy-Environment/Key-Credit-Collection-Beginning-2010/kdjh-dhwi/about\\_data](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 May 2025 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 sums 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. 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 2024 was 1,385,119 customers in arrears which is an increase of 344,455 or a 33% 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, 344,455 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	Residential Active Payment Arrangements	Residential Sales
2010	1	8,284,156	883,874	580,011	18,355	402,523	\$ 1,104,123,945
2010	2	8,260,880	918,622	555,886	41,783	434,649	\$ 732,055,632
2010	3	8,271,714	910,474	626,237	33,192	451,130	\$ 769,481,947
2010	4	8,265,363	967,417	564,845	5,907	442,381	\$ 1,030,456,443
2011	1	8,301,369	909,213	659,874	17,200	442,623	\$ 1,114,823,083
2011	2	8,304,794	954,651	616,252	31,498	458,767	\$ 743,434,625
2011	3	8,303,149	958,796	650,311	25,438	453,960	\$ 773,308,046
2011	4	8,275,533	978,563	578,020	8,360	438,576	\$ 893,731,864
2012	1	8,288,848	908,317	593,885	16,470	418,197	\$ 924,408,565
2012	2	8,283,316	917,058	545,265	29,151	401,842	\$ 696,121,606
2012	3	8,290,961	899,261	573,208	28,558	382,478	\$ 793,046,329
2012	4	8,261,950	1,051,070	466,085	5,610	378,549	\$ 905,789,374
2013	1	8,285,370	945,730	564,221	12,707	407,695	\$ 1,018,723,386
2013	2	8,310,777	1,000,328	548,657	29,324	436,706	\$ 734,423,058
2013	3	8,312,047	967,611	605,921	28,116	439,798	\$ 772,838,775
2013	4	8,275,235	990,961	597,270	5,671	418,395	\$ 1,024,151,192
2014	1	9,370,899	1,068,047	615,449	12,245	462,364	\$ 1,466,148,780
2014	2	9,375,544	1,174,551	587,996	40,699	512,686	\$ 891,113,096
2014	3	9,331,341	1,124,110	610,031	32,948	509,493	\$ 950,795,368
2014	4	9,394,656	1,094,422	582,662	8,997	448,704	\$ 1,126,101,554

Customers with Arrears Greater than 60 Days
64,333

Standard Deviation 2010-2019

1,040,664
1,385,119
344,455
128,665

2019 average

2024 average

Difference 2019 and 2024

Two deviations

Significant

**Table 1, continued: : 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
2015	1	9,429,328	1,015,960	588,301	12,095	417,228	\$ 1,321,012,993
2015	2	9,553,682	1,086,924	545,263	39,563	426,509	\$ 820,653,634
2015	3	9,461,076	1,037,652	573,308	27,992	418,341	\$ 1,015,247,804
2015	4	9,441,195	1,064,225	545,103	8,735	403,891	\$ 997,612,139
2016	1	9,469,318	985,715	554,698	17,321	379,136	\$ 1,035,516,588
2016	2	9,498,004	1,033,334	526,673	35,107	373,290	\$ 826,631,297
2016	3	9,515,762	997,656	589,632	29,619	381,831	\$ 958,773,904
2016	4	9,515,313	1,059,982	506,790	7,276	384,923	\$ 1,029,789,693
2017	1	9,557,068	991,256	568,169	10,473	397,352	\$ 1,144,696,104
2017	2	9,575,342	1,030,479	552,293	29,327	404,882	\$ 868,173,973
2017	3	9,582,696	1,020,621	562,691	25,832	388,064	\$ 932,643,607
2017	4	8,748,022	1,036,611	524,516	4,954	361,556	\$ 1,108,517,346
2018	1	9,626,437	992,341	615,355	6,205	367,159	\$ 1,250,506,429
2018	2	9,674,261	1,034,869	564,984	27,214	378,948	\$ 913,497,657
2018	3	9,684,527	1,020,696	570,957	22,678	375,385	\$ 1,136,824,122
2018	4	9,699,700	1,051,354	508,086	4,664	374,159	\$ 1,244,882,192
2019	1	9,729,955	1,008,231	570,719	9,912	376,496	\$ 1,240,547,744
2019	2	9,751,649	1,068,893	491,619	33,481	383,256	\$ 838,073,764
2019	3	9,692,477	1,039,312	550,879	31,613	375,916	\$ 991,158,694
2019	4	10,037,055	1,046,219	504,843	3,934	348,707	\$ 1,144,394,276
2020	1	9,775,065	1,063,585	455,940	7,349	330,303	\$ 1,172,754,335
2020	2	9,774,518	1,210,717	221,226	0	261,194	\$ 1,020,612,820
2020	3	9,761,730	1,197,277	224,610	0	230,294	\$ 1,047,133,009
2020	4	9,768,444	1,263,742	186,894	0	227,932	\$ 1,301,386,859
2021	1	9,782,933	1,236,492	211,900	0	235,004	\$ 1,352,857,056
2021	2	9,836,221	1,293,548	196,076	0	238,136	\$ 1,100,790,537
2021	3	9,895,239	1,285,560	348,984	0	269,028	\$ 1,192,343,179
2021	4	9,911,162	1,289,992	439,115	0	276,539	\$ 1,437,618,166
2022	1	9,981,858	1,237,766	658,585	131	321,966	\$ 1,623,971,086
2022	2	9,930,117	1,321,155	484,024	11,746	343,018	\$ 1,169,274,939
2022	3	9,988,821	1,312,977	505,408	14,573	358,283	\$ 1,410,988,407
2022	4	9,980,661	1,362,135	470,744	4,535	359,925	\$ 1,662,909,087
2023	1	10,053,700	1,326,611	548,764	2,165	402,293	\$ 1,642,740,611
2023	2	10,036,704	1,388,011	489,204	31,319	409,925	\$ 1,079,595,126
2023	3	10,054,219	1,351,031	514,620	29,550	402,589	\$ 1,263,932,317
2023	4	9,959,980	1,412,496	298,780	815	400,957	\$ 1,623,227,697
2024	1	10,070,178	1,372,729	646,198	3,963	389,786	\$ 1,651,664,471
2024	2	10,091,744	1,401,387	684,528	24,291	444,386	\$ 1,215,429,025
2024	3	10,127,588	1,382,880	546,295	34,859	467,700	\$ 1,199,225,183
2024	4	10,109,528	1,383,480	462,130	8,937	454,124	\$ 1,814,235,666

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 2024 greater than two standard deviations of the 2011- 2019 data**

<b>CE: Consolidated Edison</b>	Yes, significant
<b>PSEG: Public Service Enterprise Group</b>	No
<b>CH: Central Hudson Gas &amp; Electric</b>	Yes, significant
<b>NGrid-LI: National Grid Long Island - Natural Gas and power plants</b>	No
<b>NGrid-NY: National Grid Metro - Natural gas to Brooklyn,, Queens, and Staten Island</b>	Yes, significant
<b>NGrid-Upstate: Niagara Mohawk</b>	Yes, significant
<b>OR: Orange &amp; Rockland</b>	No
<b>NYSEG: New York State Electric and Gas</b>	No
<b>RG&amp;E: Rochester Gas &amp; Electric</b>	No
<b>NFG: National Fuel Gas - Natural Gas</b>	No
<b>Statewide</b>	Yes, significant