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November 15, 1983

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RELEASED

The Honorable Charles H. Percy Chairman, Subcommittee on Energy, Nuclear Proliferation and Government Processes Committee on Governmental Affairs United States Senate



Dear Mr. Chairman:

Subject: Disconnection of Natural Gas Service to Residential Customers (GAO/RCED-84-70)

In your July 22, 1983, request, you expressed concern over (1) the impact of higher natural gas prices and high unemployment on the ability of many families to pay their gas bills and (2) households facing disconnection of gas service due to unpaid bills at the end of last winter. You requested that we provide information on efforts taken by states to address disconnections and how these efforts relate to low-income energy assistance.

As agreed with your office, we visited five states to obtain detailed information from state agencies and natural gas utilities. We also telephoned 28 additional state public utility commissions to obtain information on their rules concerning natural gas disconnection. In response to your request, we are furnishing you information on (1) states' approaches to regulating disconnections of residential natural gas customers, (2) residential gas service disconnections and reconnections, (3) the use of heating assistance and weatherization programs by states to help avert residential natural gas disconnections. The information we obtained is summarized below and discussed in detail in enclosure I along with our objectives, scope, and methodology.

In summary, 31 of the 33 states we reviewed had established some type of year-round rules governing utility disconnections, and during the 1982-83 winter season, 23 had established additional rules providing a variety of restrictions against the disconnection of natural gas customers. With respect to disconnections and reconnections, the data obtained from the 13 utilities we contacted was not adequate to assess the extent of disconnections or reconnections. Utilities could not eliminate from the data customers who were counted as being disconnected more than once during the year, and their reconnection statistics

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did not reflect all households restored to service. All of the five states we visited had programs for assisting low-income households in paying fuel bills, providing both basic benefits and emergency assistance benefits for households facing disconnection.

As arranged with your office, unless you publicly announce its contents earlier, we will not distribute this report until 30 days after its issue date. At that time we will send copies to the Chairman, Federal Energy Regulatory Commission; the Secretary of Energy; the Secretary of Health and Human Services; the utilities we visited; the state public utility commissions; and other interested parties.

Sincerely yours,

J. Dexter Peach

Director --

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DISCONNECTION OF NATURAL GAS

SERVICE TO RESIDENTIAL CUSTOMERS

BACKGROUND

In 1982 about 56 percent of residential customers used natural gas to heat their residences. Increasing natural gas prices have caused concern about the ability of low-income households to pay their gas heating bills or face service disconnection if they cannot pay them. The distributors that provide service to natural gas residential customers are subject primarily to state or local regulation of their retail gas sales.

The federal government provides funds to the states to help low-income households cope with rising energy costs under the Low-Income Home Energy Assistance Act of 1981 (42 U.S.C. 8621 et seq.). States may use up to 15 percent of these funds to provide weatherization, including caulking and ceiling insulation to low-income households. This program is administered by the Department of Health and Human Services which provides funds to states in the form of block grants.

OBJECTIVES, SCOPE, AND METHODOLOGY

Our objectives in this assignment were to obtain and summarize available information on (1) states' approaches to regulating disconnections and their efforts to consider special rate structures, (2) the magnitude and trend of residential natural gas disconnections for nonpayment, delinquent accounts, and reconnections, and (3) states' use of heating assistance and weatherization programs to help avert residential natural gas disconnections.

As agreed with your office, our review included 33 states—5 which we visited to obtain detailed information and 28 which we contacted by telephone to obtain information only on state rules regarding disconnection. The 33 states selected were those with cold winter heating seasons, specifically those states averaging 5,000 heating degree days 1 or more per year. The five states we visited (Illinois, Indiana, New Jersey, Ohio, and Wisconsin) were among the top 10 of the 33 states in terms of both low-income population and the number of residential gas customers. In each of the five states we:

-- Interviewed and obtained data from public utility commission officials on rules regulating gas utility disconnection of residential customers for nonpayment during the

¹A heating degree day is a unit of mean daily outdoor temperature representing one degree of difference from a standard temperature, usually 65 degrees Fahrenheit. It is used as a measure of coldness in determining fuel consumption.

1982-83 heating season and rule changes being considered for the 1983-84 season.

- --Interviewed and obtained data from state agency officials administering heating assistance and weatherization programs on the funding, eligibility, benefits, and payment methods used.
- --Obtained, to the extent available, quantitative data from 13 selected large gas utilities (at least 2 in each state) on delinquent accounts, disconnections, and reconnections for calendar year 1981 through the spring of 1983. We interviewed utility officials concerning their data collection methods and limitations and their methods for handling delinquent accounts and applying state rules on disconnection. The selected utilities served a major portion of each state's residential gas customers in 1982, ranging from 59 percent in Wisconsin to 93 percent in New Jersey. (See enc. II.) As agreed with your office, we did not independently verify quantitative data from the utilities.

We telephoned officials of 28 state public utility commissions (see enc. III) to obtain information concerning year-round rules on disconnection of residential natural gas customers for nonpayment, including special rules in force during the 1982-83 winter months. We also discussed rule changes being considered for the 1983-84 winter months. We followed up on information obtained in telephone interviews by obtaining and reviewing copies of available state rules on disconnections.

We held discussions with representatives of organizations that recently studied various aspects related to residential natural gas disconnection. We also interviewed officials of consumer groups in the states visited to obtain their views on state regulation of utility disconnection (see enc. II).

At your request, we did not obtain comments on the information contained in this report. Except as noted, we performed our work in accordance with generally accepted government auditing standards. Our audit work was performed during the period August through October 1983.

²The Northwest-Midwest Congressional Coalition, the National Association of Regulatory Utility Commissioners, the National Consumer Law Center, the Citizens Energy Labor Coalition, and the American Gas Association.

STATE RULES ON DISCONNECTION

Our analysis indicated that 31 of 33 states we contacted had adopted year-round rules providing some protection against the termination of natural gas service. Twenty-three of the states had additional rules governing disconnection of service during the 1982-83 winter months. At the federal level, there is no statute that would require states to adopt rules providing protection against disconnection of services. However, Title III of the Public Utility Regulatory Policies Act of 1978 (15 U.S.C. 3201 et seq.) established voluntary standards on termination of gas service for nonpayment, including reasonable prior notice, potential health effects, and installment payments.

Year-round state rules

Our analysis in 33 states indicated that 31 states had adopted rules applicable on a year-round basis to provide some protection against disconnection, as follows:

- --Thirty-one states had rules governing prior notice of disconnection.
- -- Thirty states had rules governing medical emergency.
- -- Twenty-three states had rules requiring utilities to offer installment plans for payment of past due balances.

Thirty-one states had some type of requirement that an initial notice must be sent by the utility to the customer before disconnection. Of the remaining two states, Alaska's rules did not have a requirement and Nebraska did not regulate natural gas utilities. The number of days between the date of issuance or receipt of the first notice and the date of proposed disconnection varied among the 31 states from less than 5 days to 27 days. In addition, 19 states required a second notice of disconnection before the customer could be disconnected. The five states we visited had requirements of prior notice of disconnection ranging from 7 to 14 days. However, none of the five required a second notice of disconnection.

Thirty states had requirements enabling a customer to postpone disconnection because of a medical emergency or serious illness. Three states—Alaska, Minnesota, and Nebraska—did not have a medical rule requirement. In the five states visited, medical emergencies could prolong service from 20 to 90 days.

Twenty-three of the 33 states contacted required that utilities offer installment plans for payment of past due amounts as a means of postponing disconnection of gas service. Of the remaining 10 states, Nebraska did not have a rule and in 9 states the installment plan was used at the option of the utilities. In

the five states we visited, a minimum downpayment ranging from \$410, or 10 percent, of the amount owed to a high of 25 percent of the amount owed was required. The period for paying the balance ranged from 3 months to no specific time other than reasonable periodic payments.

Winter protection rules 1982-83

In addition to year-round policies, 23 of the 33 states had additional rules governing disconnection of service during the 1982-83 winter months. Some states told us that they were considering rule changes to restrict disconnection during the 1983-84 winter months. The 1982-83 winter protection rules varied considerably among the states, and some states had more than one category of winter restriction. The following summary prepared by GAO describes the winter rules and shows the number of states having the rule.

Rules	Number of with the	
Moratorium on disconnections	2	
Additional requirements on utilities in processing disconnection notices	15	
No disconnection if customer agrees to payment plan and/or applies for heating assistance benefits	9	
No disconnection of heating assistance recipients and/or other groups of customers	15	
No disconnection unless delinquent balance exceeds a stated amount or has been delinquent over a stated period	4	
No disconnection during certain weather conditions	5	
No disconnection unless approved by state public utility commission	2	

As shown above, the winter rules provided considerable variation in the types of protection offered to the customer. For example, Ohio and West Virginia had moratoriums on disconnections, while in Vermont a customer could be disconnected 48 hours after a

utility provided oral contact and a second notice. As another example, in the 15 states prohibiting disconnection of heating assistance recipients or other specific groups of customers, the restriction included one or more of the following groups—energy assistance recipients, financial hardship cases, elderly, handicapped, welfare recipients, and those below a certain income level.

All of the five states we visited except Indiana had special rules or orders on disconnection in effect during the 1982-83 winter season. While Indiana had no additional restrictions on disconnection during the 1982-83 winter, the Indiana Department on Aging and Community Services had requested utilities to observe a voluntary moratorium on disconnections of energy assistance recipients. The state legislature has since mandated a winter prohibition on disconnection of energy assistance beneficiaries.

Illinois has several winter stipulations in its rules, including a second notice requirement before disconnection, a 10 percent reduction of the downpayment on past due balances, and a special installment plan for reconnection of service. This is in addition to a year-round rule prohibiting disconnections when the temperature falls below 32 degrees. Chicago had a complete moratorium on disconnections in effect during the 1982-83 winter season.

In Wisconsin, the Public Service Commission has annually declared a winter emergency since 1974. During these periods, the Public Service Commission has required utilities to assure that any disconnections would not endanger health. New Jersey has declared a partial moratorium each of the last three winters on disconnection of seven groups of low-income households. However, customers who do not make a "good faith effort" to pay according to their circumstances may be referred to the Board of Public Utilities for possible disconnection. In November 1982, the Governor of Ohio asked for, and the Public Utility Commission ordered, a moratorium on disconnections from December 1, 1982, through March 31, 1983.

Consideration of changes in rate structures

Two of the five states we visited (New Jersey and Wisconsin) had considered and rejected the adoption of special rate structures for natural gas. The special rates are generally called a lifeline rate which provides an initial amount or "block" of natural gas for essential needs at a rate that is lower than the cost of providing service.

The Public Utility Regulatory Policies Act required state commissions to consider adopting lifeline rates for electricity. The five states we visited had considered and rejected lifeline electricity rates. The primary reason cited for rejection was

that such rates would benefit many customers who had the ability to pay regular rates but happened to be low users of electricity.

INADEQUATE DATA FOR ASSESSING NATURAL GAS DISCONNECTIONS AND RECONNECTIONS

In the five states visited, we requested data from 13 utilities concerning the magnitude of disconnections of residential gas customers for nonpayment. There is no federal requirement that utilities report data on disconnections. The states we visited varied considerably in the data they required utilities to report. Although all of the utilities provided us some data, the data was not adequate to assess the extent of disconnections or reconnections. Utilities could not eliminate the double counting of disconnections during the year, and their reconnection statistics did not reflect all households restored to service. As a result, utility data on an annual basis was likely to overstate both the number of households disconnected during the year and the number remaining disconnected at the onset of the winter season.

Disconnection data

The five states we visited varied considerably in the data that they required utilities to report to them concerning natural gas disconnections and the time that these requirements have been in effect. For example, Indiana has no requirements while Ohio has required utilities to report since 1980 on disconnections, reconnections, delinquent accounts, and disconnect notices mailed.

Utilities generally counted disconnections on a monthly basis. None of the utilities we visited could eliminate their customers who were disconnected more than once during the year from their statistics and could not reliably estimate the magnitude of the double counting. Accordingly, because of this double counting, totaling all the monthly disconnections would overstate the number of households disconnected during the year.

Enclosure IV presents data on winter and spring quarter disconnections in the past 3 years. Only one of the utilities showed a marked increase in winter disconnections in 1983 as compared with 1982, and nine showed decreases.

A number of utility officials and consumer spokespersons expressed the view that disconnections would have been more numerous in 1983 if the winter weather had not been mild. This view was based on recent price increases for natural gas which could have increased winter heating bills substantially. National average residential gas prices were 27 percent higher in January 1983 than in January 1982, and 50 percent higher than in January 1981.

The special winter restrictions on disconnections that the five states we visited had in effect during the winter of 1983 appeared to have a direct bearing on the number of disconnections made by the utilities we visited. For example, since Ohio and the city of Chicago had moratoriums on disconnections for the 1983 winter season, the four utilities serving customers in those jurisdictions reported no disconnections for the 1983 winter season. On the other hand, of the five states we visited, Indiana was the only one that did not have special rules on disconnection for the 1983 winter season. Also, Indiana's utilities generally had higher rates of 1983 winter disconnections than utilities in other states, ranging from 0.4 to 2.4 percent.

More disconnections occurred in the spring than in the winter. The spring 1983 disconnections ranged from 0.7 to 3.7 percent of the residential customers of the 12 utilities providing data. Eight of 12 utilities increased the number of spring disconnections in 1983 as compared with 1981.

Ohio had to cope with a sharp rise in delinquencies in the spring of 1983. Ohio had a total moratorium on disconnections from December 1, 1982, through March 31, 1983. Utility officials were critical of the moratorium because it appeared to result in higher delinquency problems at its expiration. According to data three Ohio utilities provided, 3 to 5 percent of their residential customers did not make payments during the moratorium. For these utilities, the average delinquent balances of residential customers in April 1983 were 24 to 31 percent higher than in April 1982, and the average amounts owed by those disconnected in April 1983 were 43 to 86 percent higher than those disconnected in April 1982.

Reconnection data

To determine the number of households disconnected during the year but not restored to service before the onset of winter, we obtained annual data from 10 of the 13 utilities that had information on the number of households reconnected. Data from the 10 utilities indicated that reconnections in 1982 ranged from 33 to 82 percent of the number of households disconnected in 1982. Our analysis of utility data and studies of disconnected households, however, disclosed that this data was not an accurate measurement in determining the number of households without heating service at the onset of winter because (1) the definition of reconnection most utilities used excluded a considerable portion of households restored to gas service and (2) it did not consider households that were vacant or those that were using alternative fuels.

Five of the 10 utilities providing data considered a household as reconnected only when it was reconnected within the first 5 to 10 days after disconnection. Households reconnected after this initial time period were given a new account number and

counted as a new connection. For example, in April 1983 Columbia Gas of Ohio began counting all reconnections of households disconnected for nonpayment. Before it had only counted reconnections during the first 5 working days after disconnection. Based on these new procedures, the utility counted 25,240 households that were reconnected from April through August 1983; however, its prior procedures would have understated reconnections by about 11,500 households for the same period.

Although we could not rely on the reconnection data obtained from utilities to provide an accurate measure of households without service, we noted two recent utility studies which were done on the number of occupied households which were entering the 1982-83 winter season without gas heat. Because of the short time frame for reporting, we did not evaluate the accuracy of these studies. The two studies, one conducted by an Ohio utility and one conducted by seven Pennsylvania utilities which are summarized below, indicated that only a small portion of occupied households disconnected in 1982 entered the 1982-83 winter season without gas heating service.

- --Cincinnati Gas and Electric disconnected 16,313 house-holds for nonpayment in 1982. In January 1983, a computer search by the utility indicated that 662 of these households were still without service. A utility survey of these households indicated that (1) 399 were vacant, (2) 165 were occupied by the same parties, (3) 39 were occupied by different parties, and (4) the status could not be determined for 59.
- --A survey by seven Pennsylvania utilities, as required by the state, indicated that of 21,868 customers disconnected from April to November 1982, 3,038 customers (about 0.2 percent of the total residential customers) were still without service as of December 15, 1982. However, one of the seven utilities, Columbia Gas of Pennsylvania, reported that three-fourths of the occupied households without gas service that it contacted in a February 1983 follow-up survey were using an alternate fuel for heat.

ENERGY ASSISTANCE

Under the Low-Income Home Energy Assistance Act of 1981, the Department of Health and Human Services provides funds to states in the form of block grants to help low-income households cope with rising energy costs. The five states we visited differed in their use of these funds regarding eligibility, amount used for heating assistance, allocation between regular and emergency benefits, and calculation of benefits.

Federal law limits eligibility for energy assistance to households receiving aid to families with dependent children, supplemental security income, food stamps, or a veteran's pension, as well as to households with incomes which do not exceed 150 percent of the poverty level for the state or 60 percent of state median income. Three of the five states—Illinois, Indiana, and New Jersey—restricted eligibility to 125 percent of the poverty level, while Ohio and Wisconsin used 150 percent.

The five states provided both basic heating assistance benefits and emergency assistance benefits. Emergency assistance benefits may be in addition to basic benefits and are generally used for households that are without service or are facing disconnection. Three of the five states budgeted a relatively small portion of total grant funds for emergency purposes, ranging from 2 to 7 percent, but Indiana budgeted 18 percent and Ohio 31 percent. Ohio used its emergency assistance funds at the end of its moratorium to help avert disconnections.

The Public Utility Commission of Ohio responded to the increases in delinquency by directing that special 8-month payment plans be offered to low-income customers. Ohio also made \$200 emergency energy assistance payments for customers facing disconnection, a move followed up in many cases by emergency assistance from county welfare agencies. These efforts appeared to have contained the disconnection problem in Ohio, since total disconnections during the first 8 months of 1983 by the three utilities visited did not exceed those of the same period in 1982.

The five states used a variety of approaches to calculate basic assistance benefit levels. In 1983, Ohio paid from 13 to 40 percent of recipients' actual winter fuel bills (December through February) depending on their income, with the average being 31 percent. Basic benefits in the remaining four states were based on two or more of the following factors—income level, household size, fuel type, and geographic region. For example, eligible gas—heated households in Wisconsin received one of two benefit amounts—one to households at or below 100 percent of the poverty level, or a lesser amount to households at 101 to 150 percent of the poverty level.

In the winter of 1982-83, average per household basic heating assistance benefits paid by the five states ranged from \$130 in Ohio to \$308 in Wisconsin, and average emergency assistance benefits ranged from \$120 in New Jersey to \$285 in Illinois. Average residential gas bills for the period from December 1982 through March 1983 for the 13 utilities in the five states ranged from a low of \$313 for a New Jersey utility to a high of \$457 for an Ohio utility.

Some additional energy assistance was available through welfare agencies, nongovernmental programs, and state-funded programs. Among the five states we visited, only Ohio and New Jersey had state-funded programs. Ohio's Energy Credit Program provided an average benefit of \$130 in the 1981-82 heating season to 318,673 elderly and disabled persons with annual household incomes up to \$9,000. About 30 percent of these recipients were also beneficiaries of the federally funded energy assistance program. New Jersey began using tax revenues from casinos in 1979 to support a credit on the utility bills of elderly and disabled customers with incomes up to \$12,000 (single) or \$15,000 (joint). For the 1982-83 heating season, the benefit was fixed at \$175; the program had 276,617 beneficiaries.

Most utilities could not provide data on the proportion of energy assistance beneficiaries who eventually were disconnected. However, utility officials believe that energy assistance programs are reasonably effective in helping recipients avoid loss of service. For example, Columbia Gas of Ohio compiled figures showing that less than 10 percent of the energy assistance recipients in their service area were disconnected in 1982, and these disconnections accounted for only 12 percent of total disconnections. Also, East Ohio Gas compiled statistics which showed that only 10 percent of its 1982 residential write-offs involved energy assistance recipients.

States can use up to 15 percent of the federal energy assistance funds for weatherization of low-income residences. All five states used some funds to provide weatherization assistance. Three states (New Jersey, Ohio, and Wisconsin) either referred heating assistance applicants to local weatherization agencies or provided local agencies with a list of heating assistance recipients.

CONSUMER INTEREST GROUPS GAO VISITED

ILLINOIS:

Illinois Commerce Commission

The Peoples Gas, Light & Coke Company Northern Illinois Gas Company

Illinois Public Action Council Land of Lincoln Legal Assistance Foundation

INDIANA:

Indiana Public Service Commission

Citizens Gas & Coke Utility Indiana Gas Company Northern Indiana Public Service Company

Citizens Action Coalition of Indiana Community Action Against Poverty of Greater Indianapolis Indiana Utility Consumer Counselor

NEW JERSEY:

New Jersey Board of Public Utilities

Elizabethtown Gas Company New Jersey Natural Gas Company Public Service Electric & Gas Company

Community Action Program Executive Directors' Association New Jersey Department of Public Advocate New Jersey Federation of Senior Citizens

OHIO:

Ohio Public Utilities Commission

Cincinnati Gas & Electric Company Columbia Gas of Ohio East Ohio Gas Company

Cincinnati Office of Consumer Affairs Office of the Consumers' Counsel

WISCONSIN:

Wisconsin Public Service Commission

Wisconsin Gas Company Wisconsin Natural Gas Company

Rock Walworth Counties Community Action Program

STATE UTILITY COMMISSIONS GAO CONTACTED

Alaska Public Utility Commission Arizona Corporation Commission Public Utilities Commission of the State of Colorado Connecticut Department of Public Utility Control Tdaho Public Utilities Commission Towa State Commerce Commission Kansas State Corporation Commission Maine Public Utilities Commission Massachusetts Department of Public Utilities Michigan Public Service Commission Minnesota Public Utilities Commission Missouri Public Service Commission Montana Public Service Commission Nebraska Public Service Commission Nevada Public Service Commission New Hampshire Public Utility Commission New Mexico Public Service Commission New York Public Service Commission North Dakota Public Service Commission Public Utility Commissioner of Oregon Pennsylvania Public Utility Commission Rhode Island Public Utilities Commission South Dakota Public Utilities Commission Public Service Commission of Utah Vermont Public Service Board Washington Utilities and Transportation Commission West Virginia Public Service Commission Wyoming Public Service Commission

WINTER AND SPRING DISCONNECTIONS FOR THE

13 UTILITIES GAO VISITED

	Number a	and (\$) of	households	disconnected for nonpayment		
State and utility	January through March			April through June		
	1981	1982	1983	1981	1982	1983
Northern Illinois Gas	1,976	959 (,1)	853 (.1)	23,940 (1.8)	20,460	19,928
Peoples Gas Light & Coke	(a) (a)	5,107 (.1)	(0.0)	(a) (a)	17,158 (2.1)	(a) (a)
Indiana Citizens Gas & Coke	4,593 (2.4)	4,836 (2.5)	4,666 (2.4)	7,267 (3.9)	7,026 (3.6)	7,224 (3.7)
Indiana Gas	1,315 (0.5)	1,324 (0,5)	1,209	1,793 (0,7)	1,214 (0.4)	1,965 (0.7)
Northern Indiana Public Service	5,864 (1.3)	7,303 (1.6)	7,688 (1,7)	13,050 (2,9)	15,821 (3.5)	11,786 (2.6)
New Jersey Elizabethtown Gas	576 (1.4)	2,160 (1.5)	2,079 (1.1)	2,554 (1.4)	3,321 (1.8)	3,857 (2.1)
New Jersey Natural Gas	528 (0,5)	1,080 (0.4)	963 (0.4)	2,806 (1.3)	3,026 (1.4)	3,309 (1,5)
Public Service Electric & Gas ^C	8,323 (0,5)	8,630 (0.5)	10,154 (0.6)	26,483 (1.5)	20,750 (1,2)	39,971 (2.3)
Ohio Cincinnati Gas & Electric ^C	3,142 (0.7)	2,485 (0.5)	0 . 0)	4,554 (1.0)	6,258 (1.4)	3,209 (0,7)
Columbia Gas	8,538 (0.9)	6,794 (0.7)	(0 . 0)	20,395 (2.1)	28,869 (3.0)	33,304 (3.4)
East Ohio Gas	4,898 (0.5)	12,717 (1.4)	0 . 0)	19,319 (2,1)	27,040 (2.9)	31,427 (3,4)
Wisconsin Wisconsin Gas	0 (0 . 0)	0 (0.0)	0 (0.0)	6,42 <u>/</u> 4 (1,7)	6,937 (1.8)	8,155 (2.1)
Wisconsin Natural Gas	50 (e)	26 (e)	39 (e)	3,457 (1.8)	3,967 (2.0)	3,958 (2.0)

aData was not available.

Source: Number of households disconnected from utilities cited; percentages we computed based on utility-supplied data.

bClty of Chicago moratorium in effect.

Cincludes both gas and electric customers.

dState-ordered moratorium in effect.

eLess than one-tenth of a percent.