THE UNIVERSITY OF CHICAGO
THE LAW SCHOOL
Abrams Environmental
Law Clinic

May 7, 2024

Via E-Filing

Ms. Lisa Felice
Executive Secretary
Michigan Public Service Commission
7109 West Saginaw Highway
Lansing, MI 48917

RE: MPSC Case No. U-21291

Dear Ms. Felice:

Please find enclosed the NON-CONFIDENTIAL Accompanying Exhibits FLO-210 to FLO-216 (Part 2 of 4) for the Direct Testimony of Sergio Cira-Reyes on Behalf of Frontline Organizations, along with proof of service for electronic filing in the above-referenced matter. Please do not hesitate to contact me with any questions or comments.

Please do not hesitate to contact my office with any questions or comments.

Sincerely,

Mark N. Templeton, *pro hac vice*
6020 S. University Avenue
Chicago, IL 60637
Phone: (773) 702-9611
Email: templeton@uchicago.edu

xc: Parties to Case No. U-21291

United States Census Bureau

QuickFacts
Kent County, Michigan

QuickFacts provides statistics for all states and counties. Also for cities and towns with a ***population of 5,000 or more***.

All Topics	Kent County, Michigan
Population estimates, July 1, 2023, (V2023)	**661,354**
PEOPLE	
Population	
Population estimates, July 1, 2023, (V2023)	**661,354**
Population Estimates, July 1, 2022, (V2022)	658,920
Population estimates base, April 1, 2020, (V2023)	657,977
Population estimates base, April 1, 2020, (V2022)	657,977
Population, percent change - April 1, 2020 (estimates base) to July 1, 2023, (V2023)	0.5%
Population, percent change - April 1, 2020 (estimates base) to July 1, 2022, (V2022)	0.1%
Population, Census, April 1, 2020	657,974
Population, Census, April 1, 2010	602,622
Age and Sex	
Persons under 5 years, percent	6.1%
Persons under 18 years, percent	23.2%
Persons 65 years and over, percent	15.1%
Female persons, percent	50.3%
Race and Hispanic Origin	
White alone, percent	81.6%
Black or African American alone, percent (a)	10.8%
American Indian and Alaska Native alone, percent (a)	0.7%
Asian alone, percent (a)	3.5%
Native Hawaiian and Other Pacific Islander alone, percent (a)	0.1%
Two or More Races, percent	3.3%
Hispanic or Latino, percent (b)	11.3%
White alone, not Hispanic or Latino, percent	72.3%
Population Characteristics	
Veterans, 2018-2022	27,591
Foreign born persons, percent, 2018-2022	8.4%
Housing	
Housing units, July 1, 2022, (V2022)	268,701
Owner-occupied housing unit rate, 2018-2022	70.0%
Median value of owner-occupied housing units, 2018-2022	$242,200
Median selected monthly owner costs -with a mortgage, 2018-2022	$1,484
Median selected monthly owner costs -without a mortgage, 2018-2022	$572
Median gross rent, 2018-2022	$1,111
Building permits, 2022	2,385
Families & Living Arrangements	
Households, 2018-2022	252,694
Persons per household, 2018-2022	2.56
Living in same house 1 year ago, percent of persons age 1 year+, 2018-2022	86.4%
Language other than English spoken at home, percent of persons age 5 years+, 2018-2022	12.4%
Computer and Internet Use	
Households with a computer, percent, 2018-2022	94.4%
Households with a broadband Internet subscription, percent, 2018-2022	89.8%
Education	
High school graduate or higher, percent of persons age 25 years+, 2018-2022	92.4%
Bachelor's degree or higher, percent of persons age 25 years+, 2018-2022	38.6%
Health	
With a disability, under age 65 years, percent, 2018-2022	7.9%
Persons without health insurance, under age 65 years, percent	6.4%

Economy	
In civilian labor force, total, percent of population age 16 years+, 2018-2022	69.1%
In civilian labor force, female, percent of population age 16 years+, 2018-2022	64.0%
Total accommodation and food services sales, 2017 ($1,000) (c)	1,540,591
Total health care and social assistance receipts/revenue, 2017 ($1,000) (c)	6,984,479
Total transportation and warehousing receipts/revenue, 2017 ($1,000) (c)	1,996,503
Total retail sales, 2017 ($1,000) (c)	11,021,463
Total retail sales per capita, 2017 (c)	$16,963
Transportation	
Mean travel time to work (minutes), workers age 16 years+, 2018-2022	21.4
Income & Poverty	
Median household income (in 2022 dollars), 2018-2022	$76,247
Per capita income in past 12 months (in 2022 dollars), 2018-2022	$39,342
Persons in poverty, percent	⚠ 10.7%

BUSINESSES

Businesses	
Total employer establishments, 2021	17,226
Total employment, 2021	353,731
Total annual payroll, 2021 ($1,000)	20,009,865
Total employment, percent change, 2020-2021	-5.9%
Total nonemployer establishments, 2021	54,282
All employer firms, Reference year 2017	12,650
Men-owned employer firms, Reference year 2017	8,071
Women-owned employer firms, Reference year 2017	1,848
Minority-owned employer firms, Reference year 2017	758
Nonminority-owned employer firms, Reference year 2017	10,310
Veteran-owned employer firms, Reference year 2017	680
Nonveteran-owned employer firms, Reference year 2017	10,252

GEOGRAPHY

Geography	
Population per square mile, 2020	775.1
Population per square mile, 2010	711.5
Land area in square miles, 2020	848.93
Land area in square miles, 2010	846.95
FIPS Code	26081

About datasets used in this table

Value Notes

⚠ Methodology differences may exist between data sources, and so estimates from different sources are not comparable.

Some estimates presented here come from sample data, and thus have sampling errors that may render some apparent differences between geographies statistically indistinguishable. Click the Quick Info icon to the left of each row in TAI learn about sampling error.

The vintage year (e.g., V2023) refers to the final year of the series (2020 thru 2023). Different vintage years of estimates are not comparable.

Users should exercise caution when comparing 2018-2022 ACS 5-year estimates to other ACS estimates. For more information, please visit the 2022 5-year ACS Comparison Guidance page.

Fact Notes

- **(a)** Includes persons reporting only one race
- **(c)** Economic Census - Puerto Rico data are not comparable to U.S. Economic Census data
- **(b)** Hispanics may be of any race, so also are included in applicable race categories

Value Flags

- **-** Either no or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest or upper interval of an open ende
- **F** Fewer than 25 firms
- **D** Suppressed to avoid disclosure of confidential information
- **N** Data for this geographic area cannot be displayed because the number of sample cases is too small.
- **FN** Footnote on this item in place of data
- **X** Not applicable
- **S** Suppressed; does not meet publication standards
- **NA** Not available
- **Z** Value greater than zero but less than half unit of measure shown

QuickFacts data are derived from: Population Estimates, American Community Survey, Census of Population and Housing, Current Population Survey, Small Area Health Insurance Estimates, Small Area Income and Poverty Estimates, Stat Housing Unit Estimates, County Business Patterns, Nonemployer Statistics, Economic Census, Survey of Business Owners, Building Permits.

Michigan 2022
Home Energy Affordability Gap
(Published April 2023)

County_Only	Shortfall Calculation -- Less than 50% of Federal Poverty Level			
	Individual HH Shortfall	Number of Households	Aggregate Shortfall	Home Energy Burden
Alcona County	$3,086	325	$1,002,918	47.2%
Alger County	$3,641	142	$517,083	49.3%
Allegan County	$3,110	1,802	$5,603,337	42.2%
Alpena County	$2,767	778	$2,152,692	41.4%
Antrim County	$3,281	390	$1,279,435	47.6%
Arenac County	$3,263	281	$916,792	46.8%
Baraga County	$3,198	187	$598,075	46.5%
Barry County	$3,204	958	$3,069,745	44.3%
Bay County	$2,491	2,790	$6,949,556	37.7%
Benzie County	$3,436	209	$718,029	46.8%
Berrien County	$2,638	4,285	$11,304,304	38.8%
Branch County	$2,958	931	$2,754,151	41.3%
Calhoun County	$2,516	3,007	$7,565,328	36.8%
Cass County	$3,067	1,249	$3,830,924	43.4%
Charlevoix County	$2,911	400	$1,164,343	43.9%
Cheboygan County	$2,928	458	$1,341,226	42.4%
Chippewa County	$3,396	1,113	$3,779,533	47.5%
Clare County	$3,570	1,010	$3,605,822	48.2%
Clinton County	$2,982	1,494	$4,455,545	41.7%
Crawford County	$3,552	408	$1,449,394	51.5%
Delta County	$3,004	849	$2,550,003	44.0%
Dickinson County	$2,918	573	$1,672,195	43.5%
Eaton County	$2,754	1,505	$4,145,291	40.2%
Emmet County	$3,054	482	$1,472,249	44.3%
Genesee County	$2,490	12,146	$30,242,689	36.6%
Gladwin County	$3,281	657	$2,155,638	47.2%
Gogebic County	$2,863	392	$1,122,418	44.2%
Grand Traverse County	$2,730	1,871	$5,108,499	39.7%
Gratiot County	$2,976	988	$2,940,624	42.7%
Hillsdale County	$3,280	1,170	$3,837,082	45.8%
Houghton County	$3,126	1,174	$3,670,476	43.9%

Michigan 2022
Home Energy Affordability Gap
(Published April 2023)

County_Only	Shortfall Calculation -- Less than 50% of Federal Poverty Level			
	Individual HH Shortfall	Number of Households	Aggregate Shortfall	Home Energy Burden
Huron County	$2,879	581	$1,672,643	42.5%
Ingham County	$2,434	9,764	$23,765,275	36.6%
Ionia County	$3,336	932	$3,109,306	44.0%
Iosco County	$2,603	651	$1,694,504	39.9%
Iron County	$3,292	346	$1,138,888	48.6%
Isabella County	$2,902	3,061	$8,882,545	41.8%
Jackson County	$2,655	2,825	$7,501,441	38.5%
Kalamazoo County	$2,467	7,165	$17,675,321	36.5%
Kalkaska County	$3,777	430	$1,624,211	51.5%
Kent County	$2,609	11,839	$30,892,486	37.0%
Keweenaw County	$3,256	69	$224,639	50.9%
Lake County	$4,273	295	$1,260,464	54.9%
Lapeer County	$3,134	1,702	$5,334,904	43.5%
Leelanau County	$3,208	323	$1,036,162	45.7%
Lenawee County	$2,675	1,770	$4,735,625	38.8%
Livingston County	$2,822	1,985	$5,601,582	39.4%
Luce County	$3,023	126	$380,899	46.3%
Mackinac County	$3,197	302	$965,590	48.8%
Macomb County	$2,418	14,791	$35,766,203	35.4%
Manistee County	$2,967	519	$1,539,687	42.5%
Marquette County	$2,885	1,845	$5,322,545	42.0%
Mason County	$2,992	687	$2,055,216	43.4%
Mecosta County	$3,092	1,447	$4,474,197	44.6%
Menominee County	$3,247	442	$1,435,254	46.4%
Midland County	$2,738	1,632	$4,468,442	39.8%
Missaukee County	$3,861	287	$1,107,974	52.3%
Monroe County	$2,611	2,905	$7,585,446	37.7%
Montcalm County	$3,358	1,189	$3,993,002	44.9%
Montmorency County	$2,862	285	$815,753	44.1%
Muskegon County	$2,661	3,914	$10,415,900	37.8%
Newaygo County	$3,650	1,036	$3,781,354	49.3%

Michigan 2022
Home Energy Affordability Gap
(Published April 2023)

County_Only	Shortfall Calculation -- Less than 50% of Federal Poverty Level			
	Individual HH Shortfall	Number of Households	Aggregate Shortfall	Home Energy Burden
Oakland County	$2,428	17,580	$42,686,462	35.9%
Oceana County	$3,760	576	$2,165,618	50.1%
Ogemaw County	$3,405	582	$1,981,861	49.5%
Ontonagon County	$3,214	156	$501,438	48.3%
Osceola County	$3,834	481	$1,844,033	51.5%
Oscoda County	$3,614	196	$708,406	50.0%
Otsego County	$2,990	499	$1,491,970	43.4%
Ottawa County	$2,695	3,809	$10,263,385	37.5%
Presque Isle County	$2,985	268	$799,965	44.9%
Roscommon County	$2,644	805	$2,128,232	41.1%
Saginaw County	$2,560	6,173	$15,800,151	38.0%
St. Clair County	$2,689	3,814	$10,257,382	39.1%
St. Joseph County	$2,927	1,220	$3,571,545	41.1%
Sanilac County	$3,111	1,043	$3,245,261	44.9%
Schoolcraft County	$3,396	222	$753,918	50.3%
Shiawassee County	$2,906	1,295	$3,763,001	41.6%
Tuscola County	$3,227	1,176	$3,794,713	45.6%
Van Buren County	$2,911	1,609	$4,684,080	40.9%
Washtenaw County	$2,417	11,615	$28,069,450	36.0%
Wayne County	$2,349	66,498	$156,190,534	33.9%
Wexford County	$3,380	753	$2,544,793	46.3%
Total Michigan	$2,590	239,539	$620,479,052	37.50%

Michigan 2022
Home Energy Affordability Gap
(Published April 2023)

County_Only	Shortfall Calculation -- 50% - 99% of Federal Poverty Level			
	Individual HH Shortfall	Number of Households	Aggregate Shortfall	Home Energy Burden
Alcona County	$2,692	431	$1,160,455	25.2%
Alger County	$3,199	200	$639,886	26.3%
Allegan County	$2,659	2,139	$5,686,723	22.5%
Alpena County	$2,357	1,093	$2,575,846	22.1%
Antrim County	$2,866	603	$1,728,413	25.4%
Arenac County	$2,842	597	$1,696,920	24.9%
Baraga County	$2,784	240	$668,164	24.8%
Barry County	$2,765	1,112	$3,075,014	23.6%
Bay County	$2,079	4,167	$8,661,595	20.1%
Benzie County	$2,994	478	$1,430,915	25.0%
Berrien County	$2,216	5,855	$12,974,299	20.7%
Branch County	$2,518	1,226	$3,087,381	22.0%
Calhoun County	$2,087	5,446	$11,364,667	19.6%
Cass County	$2,636	1,319	$3,477,011	23.1%
Charlevoix County	$2,508	660	$1,654,960	23.4%
Cheboygan County	$2,506	874	$2,190,475	22.6%
Chippewa County	$2,966	1,316	$3,902,863	25.3%
Clare County	$3,126	1,759	$5,498,877	25.7%
Clinton County	$2,544	1,102	$2,803,772	22.3%
Crawford County	$3,142	462	$1,451,676	27.4%
Delta County	$2,588	1,092	$2,826,423	23.5%
Dickinson County	$2,510	497	$1,247,479	23.2%
Eaton County	$2,331	1,992	$4,643,710	21.4%
Emmet County	$2,635	624	$1,644,400	23.6%
Genesee County	$2,063	15,790	$32,571,586	19.5%
Gladwin County	$2,863	966	$2,765,485	25.2%
Gogebic County	$2,470	523	$1,291,747	23.6%
Grand Traverse County	$2,305	2,206	$5,085,290	21.2%
Gratiot County	$2,550	1,267	$3,231,103	22.8%
Hillsdale County	$2,846	1,553	$4,420,581	24.4%
Houghton County	$2,693	1,214	$3,269,777	23.4%

Michigan 2022
Home Energy Affordability Gap
(Published April 2023)

County_Only	Shortfall Calculation -- 50% - 99% of Federal Poverty Level			
	Individual HH Shortfall	Number of Households	Aggregate Shortfall	Home Energy Burden
Huron County	$2,465	1,018	$2,509,022	22.7%
Ingham County	$2,016	10,266	$20,693,776	19.5%
Ionia County	$2,875	1,335	$3,838,569	23.5%
Iosco County	$2,200	910	$2,001,619	21.3%
Iron County	$2,886	426	$1,229,546	25.9%
Isabella County	$2,476	2,793	$6,914,641	22.3%
Jackson County	$2,226	4,562	$10,156,214	20.5%
Kalamazoo County	$2,043	7,898	$16,133,557	19.5%
Kalkaska County	$3,341	686	$2,292,052	27.5%
Kent County	$2,167	14,254	$30,893,884	19.7%
Keweenaw County	$2,875	33	$94,878	27.2%
Lake County	$3,814	548	$2,090,022	29.3%
Lapeer County	$2,695	1,681	$4,531,077	23.2%
Leelanau County	$2,784	268	$746,051	24.4%
Lenawee County	$2,247	2,466	$5,542,018	20.7%
Livingston County	$2,378	1,765	$4,197,123	21.0%
Luce County	$2,630	225	$591,655	24.7%
Mackinac County	$2,805	481	$1,349,147	26.0%
Macomb County	$1,986	21,295	$42,292,257	18.9%
Manistee County	$2,540	542	$1,376,414	22.6%
Marquette County	$2,465	2,211	$5,449,352	22.4%
Mason County	$2,571	1,117	$2,872,240	23.1%
Mecosta County	$2,672	1,571	$4,197,487	23.8%
Menominee County	$2,825	580	$1,638,503	24.7%
Midland County	$2,313	2,010	$4,648,862	21.2%
Missaukee County	$3,423	419	$1,434,028	27.9%
Monroe County	$2,179	4,047	$8,818,742	20.1%
Montcalm County	$2,905	1,827	$5,308,135	24.0%
Montmorency County	$2,468	415	$1,024,165	23.5%
Muskegon County	$2,221	4,670	$10,372,880	20.1%
Newaygo County	$3,207	1,888	$6,054,750	26.3%

Michigan 2022
Home Energy Affordability Gap
(Published April 2023)

County_Only	Shortfall Calculation -- 50% - 99% of Federal Poverty Level			
	Individual HH Shortfall	Number of Households	Aggregate Shortfall	Home Energy Burden
Oakland County	$2,002	21,854	$43,751,402	19.2%
Oceana County	$3,312	719	$2,381,189	26.7%
Ogemaw County	$2,994	940	$2,814,348	26.4%
Ontonagon County	$2,815	243	$684,037	25.7%
Osceola County	$3,392	788	$2,672,697	27.5%
Oscoda County	$3,183	214	$681,209	26.7%
Otsego County	$2,571	637	$1,637,547	23.2%
Ottawa County	$2,246	4,359	$9,788,444	20.0%
Presque Isle County	$2,582	499	$1,288,220	23.9%
Roscommon County	$2,248	1,033	$2,322,549	21.9%
Saginaw County	$2,139	7,872	$16,841,079	20.3%
St. Clair County	$2,263	4,017	$9,091,524	20.9%
St. Joseph County	$2,489	1,739	$4,329,173	21.9%
Sanilac County	$2,691	1,493	$4,018,074	23.9%
Schoolcraft County	$2,994	335	$1,002,882	26.8%
Shiawassee County	$2,478	1,696	$4,202,128	22.2%
Tuscola County	$2,799	1,672	$4,679,383	24.3%
Van Buren County	$2,473	2,414	$5,970,159	21.8%
Washtenaw County	$1,993	8,197	$16,340,625	19.2%
Wayne County	$1,907	74,213	$141,509,413	18.1%
Wexford County	$2,940	937	$2,754,332	24.7%
Total Michigan	$2,177	288,881	$628,780,577	20.13%

Michigan 2022
Home Energy Affordability Gap
(Published April 2023)

County_Only	Shortfall Calculation -- 100% - 124% of Federal Poverty Level			
	Individual HH Shortfall	Number of Households	Aggregate Shortfall	Home Energy Burden
Alcona County	$2,271	183	$415,582	16.8%
Alger County	$2,726	148	$403,427	17.5%
Allegan County	$2,175	1,633	$3,552,527	15.0%
Alpena County	$1,917	828	$1,587,349	14.7%
Antrim County	$2,423	382	$925,403	16.9%
Arenac County	$2,392	283	$676,994	16.6%
Baraga County	$2,340	210	$491,438	16.5%
Barry County	$2,295	602	$1,381,539	15.8%
Bay County	$1,637	1,318	$2,157,441	13.4%
Benzie County	$2,520	226	$569,514	16.6%
Berrien County	$1,764	2,988	$5,269,649	13.8%
Branch County	$2,047	740	$1,514,638	14.7%
Calhoun County	$1,627	2,291	$3,727,518	13.1%
Cass County	$2,174	660	$1,434,977	15.4%
Charlevoix County	$2,075	304	$630,910	15.6%
Cheboygan County	$2,054	779	$1,600,014	15.1%
Chippewa County	$2,505	604	$1,512,944	16.9%
Clare County	$2,650	659	$1,746,642	17.1%
Clinton County	$2,075	913	$1,894,416	14.8%
Crawford County	$2,703	369	$997,248	18.3%
Delta County	$2,143	686	$1,470,374	15.6%
Dickinson County	$2,073	532	$1,102,599	15.5%
Eaton County	$1,878	1,463	$2,747,202	14.3%
Emmet County	$2,186	515	$1,125,847	15.7%
Genesee County	$1,605	8,012	$12,860,521	13.0%
Gladwin County	$2,415	700	$1,690,317	16.8%
Gogebic County	$2,048	451	$923,805	15.7%
Grand Traverse County	$1,850	1,312	$2,426,795	14.1%
Gratiot County	$2,094	712	$1,490,658	15.2%
Hillsdale County	$2,382	849	$2,022,713	16.3%
Houghton County	$2,229	654	$1,458,014	15.6%

Michigan 2022
Home Energy Affordability Gap
(Published April 2023)

County_Only	Shortfall Calculation -- 100% - 124% of Federal Poverty Level			
	Individual HH Shortfall	Number of Households	Aggregate Shortfall	Home Energy Burden
Huron County	$2,021	787	$1,590,388	15.1%
Ingham County	$1,568	5,114	$8,017,092	13.0%
Ionia County	$2,382	922	$2,195,820	15.6%
Iosco County	$1,767	686	$1,212,456	14.2%
Iron County	$2,452	267	$654,679	17.3%
Isabella County	$2,019	1,313	$2,651,111	14.8%
Jackson County	$1,766	2,500	$4,416,246	13.7%
Kalamazoo County	$1,588	4,399	$6,986,864	13.0%
Kalkaska County	$2,874	472	$1,356,521	18.3%
Kent County	$1,694	9,297	$15,747,374	13.2%
Keweenaw County	$2,467	21	$51,815	18.1%
Lake County	$3,322	326	$1,083,064	19.5%
Lapeer County	$2,225	1,358	$3,021,659	15.5%
Leelanau County	$2,329	276	$642,892	16.3%
Lenawee County	$1,789	1,681	$3,006,752	13.8%
Livingston County	$1,902	1,544	$2,937,118	14.0%
Luce County	$2,208	77	$170,020	16.5%
Mackinac County	$2,384	294	$701,016	17.3%
Macomb County	$1,523	12,958	$19,735,904	12.6%
Manistee County	$2,082	402	$836,911	15.1%
Marquette County	$2,014	967	$1,947,971	14.9%
Mason County	$2,121	482	$1,022,409	15.4%
Mecosta County	$2,222	714	$1,586,258	15.9%
Menominee County	$2,373	506	$1,200,573	16.5%
Midland County	$1,857	1,253	$2,327,259	14.2%
Missaukee County	$2,953	295	$871,187	18.6%
Monroe County	$1,716	1,658	$2,845,344	13.4%
Montcalm County	$2,420	1,133	$2,742,008	16.0%
Montmorency County	$2,045	231	$472,458	15.7%
Muskegon County	$1,750	3,322	$5,812,591	13.4%
Newaygo County	$2,732	913	$2,494,619	17.5%

Michigan 2022
Home Energy Affordability Gap
(Published April 2023)

County_Only	Shortfall Calculation -- 100% - 124% of Federal Poverty Level			
	Individual HH Shortfall	Number of Households	Aggregate Shortfall	Home Energy Burden
Oakland County	$1,545	11,513	$17,792,271	12.8%
Oceana County	$2,832	554	$1,568,853	17.8%
Ogemaw County	$2,553	504	$1,286,883	17.6%
Ontonagon County	$2,387	149	$355,672	17.2%
Osceola County	$2,918	457	$1,333,607	18.3%
Oscoda County	$2,721	140	$380,986	17.8%
Otsego County	$2,122	536	$1,137,163	15.4%
Ottawa County	$1,765	2,668	$4,707,862	13.3%
Presque Isle County	$2,149	378	$812,492	15.9%
Roscommon County	$1,825	550	$1,003,583	14.6%
Saginaw County	$1,689	3,416	$5,770,163	13.5%
St. Clair County	$1,807	2,798	$5,055,100	13.9%
St. Joseph County	$2,020	1,028	$2,076,702	14.6%
Sanilac County	$2,241	1,024	$2,294,854	16.0%
Schoolcraft County	$2,563	222	$568,894	17.9%
Shiawassee County	$2,019	1,316	$2,656,960	14.8%
Tuscola County	$2,340	1,180	$2,761,166	16.2%
Van Buren County	$2,004	1,457	$2,919,561	14.5%
Washtenaw County	$1,540	3,641	$5,607,487	12.8%
Wayne County	$1,433	34,365	$49,252,945	12.1%
Wexford County	$2,468	730	$1,801,695	16.5%
Total Michigan	$1,743	156,800	$273,292,292	13.54%

Michigan 2022
Home Energy Affordability Gap
(Published April 2023)

County_Only	Shortfall Calculation -- 125% - 149% of Federal Poverty Level			
	Individual HH Shortfall	Number of Households	Aggregate Shortfall	Home Energy Burden
Alcona County	$1,990	204	$405,943	13.7%
Alger County	$2,410	165	$397,674	14.3%
Allegan County	$1,853	1,934	$3,584,427	12.3%
Alpena County	$1,624	720	$1,169,301	12.0%
Antrim County	$2,127	459	$976,124	13.8%
Arenac County	$2,092	332	$694,566	13.6%
Baraga County	$2,044	195	$398,637	13.5%
Barry County	$1,981	869	$1,721,772	12.9%
Bay County	$1,342	1,916	$2,572,099	11.0%
Benzie County	$2,204	246	$542,248	13.6%
Berrien County	$1,462	3,350	$4,897,867	11.3%
Branch County	$1,733	1,211	$2,098,070	12.0%
Calhoun County	$1,321	2,298	$3,034,547	10.7%
Cass County	$1,866	740	$1,381,048	12.6%
Charlevoix County	$1,787	625	$1,117,038	12.8%
Cheboygan County	$1,752	548	$960,304	12.3%
Chippewa County	$2,198	683	$1,500,999	13.8%
Clare County	$2,333	451	$1,052,324	14.0%
Clinton County	$1,762	934	$1,645,757	12.1%
Crawford County	$2,410	209	$503,588	15.0%
Delta County	$1,847	868	$1,603,026	12.8%
Dickinson County	$1,781	413	$735,517	12.7%
Eaton County	$1,576	1,271	$2,002,492	11.7%
Emmet County	$1,887	680	$1,282,943	12.9%
Genesee County	$1,300	7,623	$9,910,383	10.6%
Gladwin County	$2,116	647	$1,369,063	13.7%
Gogebic County	$1,767	425	$751,113	12.9%
Grand Traverse County	$1,546	1,412	$2,182,971	11.6%
Gratiot County	$1,789	647	$1,157,635	12.4%
Hillsdale County	$2,073	1,077	$2,232,754	13.3%
Houghton County	$1,920	799	$1,534,109	12.8%

Michigan 2022
Home Energy Affordability Gap
(Published April 2023)

County_Only	Shortfall Calculation -- 125% - 149% of Federal Poverty Level			
	Individual HH Shortfall	Number of Households	Aggregate Shortfall	Home Energy Burden
Huron County	$1,725	701	$1,209,178	12.4%
Ingham County	$1,269	3,936	$4,994,601	10.6%
Ionia County	$2,052	856	$1,756,870	12.8%
Iosco County	$1,479	970	$1,434,947	11.6%
Iron County	$2,162	276	$596,840	14.1%
Isabella County	$1,715	1,364	$2,338,904	12.1%
Jackson County	$1,460	2,864	$4,181,407	11.2%
Kalamazoo County	$1,285	4,317	$5,548,703	10.6%
Kalkaska County	$2,563	345	$884,069	15.0%
Kent County	$1,378	9,521	$13,120,875	10.8%
Keweenaw County	$2,196	23	$50,498	14.8%
Lake County	$2,995	343	$1,027,125	16.0%
Lapeer County	$1,911	1,263	$2,414,212	12.6%
Leelanau County	$2,026	254	$514,693	13.3%
Lenawee County	$1,483	1,690	$2,506,044	11.3%
Livingston County	$1,585	1,560	$2,472,832	11.5%
Luce County	$1,927	123	$237,024	13.5%
Mackinac County	$2,104	252	$530,232	14.2%
Macomb County	$1,214	12,457	$15,128,194	10.3%
Manistee County	$1,777	510	$906,155	12.4%
Marquette County	$1,714	1,046	$1,793,168	12.2%
Mason County	$1,821	608	$1,107,194	12.6%
Mecosta County	$1,922	886	$1,702,460	13.0%
Menominee County	$2,071	416	$861,586	13.5%
Midland County	$1,554	1,091	$1,695,056	11.6%
Missaukee County	$2,640	395	$1,042,917	15.2%
Monroe County	$1,407	2,046	$2,879,737	11.0%
Montcalm County	$2,097	1,118	$2,344,030	13.1%
Montmorency County	$1,764	201	$354,472	12.8%
Muskegon County	$1,435	3,719	$5,338,359	11.0%
Newaygo County	$2,416	887	$2,142,912	14.3%

Michigan 2022
Home Energy Affordability Gap
(Published April 2023)

County_Only	Shortfall Calculation -- 125% - 149% of Federal Poverty Level			
	Individual HH Shortfall	Number of Households	Aggregate Shortfall	Home Energy Burden
Oakland County	$1,241	13,445	$16,685,527	10.4%
Oceana County	$2,512	694	$1,743,260	14.6%
Ogemaw County	$2,260	576	$1,301,514	14.4%
Ontonagon County	$2,102	101	$212,281	14.0%
Osceola County	$2,602	411	$1,069,612	15.0%
Oscoda County	$2,413	259	$625,072	14.6%
Otsego County	$1,822	587	$1,069,598	12.6%
Ottawa County	$1,444	3,846	$5,553,224	10.9%
Presque Isle County	$1,861	234	$435,555	13.0%
Roscommon County	$1,542	587	$905,306	12.0%
Saginaw County	$1,389	3,612	$5,017,139	11.0%
St. Clair County	$1,502	2,450	$3,680,628	11.4%
St. Joseph County	$1,707	1,229	$2,098,218	12.0%
Sanilac County	$1,941	828	$1,607,090	13.1%
Schoolcraft County	$2,275	184	$418,635	14.6%
Shiawassee County	$1,713	1,182	$2,024,960	12.1%
Tuscola County	$2,034	1,074	$2,184,697	13.3%
Van Buren County	$1,691	1,685	$2,849,225	11.9%
Washtenaw County	$1,238	4,287	$5,306,592	10.5%
Wayne County	$1,118	31,589	$35,301,209	9.9%
Wexford County	$2,154	685	$1,475,337	13.5%
Total Michigan	$1,442	159,534	$230,096,312	11.11%

Michigan 2022
Home Energy Affordability Gap
(Published April 2023)

County_Only	Shortfall Calculation -- 150% - 184% of Federal Poverty Level			
	Individual HH Shortfall	Number of Households	Aggregate Shortfall	Home Energy Burden
Alcona County	$1,653	393	$649,507	11.3%
Alger County	$2,031	288	$585,012	11.8%
Allegan County	$1,467	2,380	$3,491,154	10.1%
Alpena County	$1,272	1,240	$1,577,727	9.9%
Antrim County	$1,772	637	$1,128,486	11.4%
Arenac County	$1,732	488	$845,168	11.2%
Baraga County	$1,689	240	$405,413	11.1%
Barry County	$1,605	1,340	$2,150,723	10.6%
Bay County	$989	3,122	$3,087,854	9.0%
Benzie County	$1,825	367	$669,924	11.2%
Berrien County	$1,100	3,922	$4,314,926	9.3%
Branch County	$1,355	1,614	$2,187,539	9.9%
Calhoun County	$953	4,188	$3,989,927	8.8%
Cass County	$1,497	1,255	$1,878,446	10.4%
Charlevoix County	$1,442	683	$984,570	10.5%
Cheboygan County	$1,391	864	$1,201,405	10.1%
Chippewa County	$1,829	996	$1,821,679	11.3%
Clare County	$1,953	1,076	$2,101,167	11.5%
Clinton County	$1,387	1,570	$2,176,953	10.0%
Crawford County	$2,058	348	$716,129	12.3%
Delta County	$1,491	1,330	$1,982,880	10.5%
Dickinson County	$1,431	740	$1,058,897	10.4%
Eaton County	$1,213	2,575	$3,122,986	9.6%
Emmet County	$1,527	765	$1,168,434	10.6%
Genesee County	$934	11,107	$10,373,389	8.7%
Gladwin County	$1,758	1,009	$1,773,368	11.3%
Gogebic County	$1,430	638	$912,403	10.6%
Grand Traverse County	$1,182	1,739	$2,054,802	9.5%
Gratiot County	$1,424	1,111	$1,582,032	10.2%
Hillsdale County	$1,702	1,392	$2,369,063	10.9%
Houghton County	$1,549	1,096	$1,697,513	10.5%

Michigan 2022
Home Energy Affordability Gap
(Published April 2023)

County_Only	Shortfall Calculation -- 150% - 184% of Federal Poverty Level			
	Individual HH Shortfall	Number of Households	Aggregate Shortfall	Home Energy Burden
Huron County	$1,370	1,070	$1,465,755	10.1%
Ingham County	$910	6,898	$6,280,539	8.7%
Ionia County	$1,657	1,220	$2,022,051	10.5%
Iosco County	$1,134	1,057	$1,198,220	9.5%
Iron County	$1,815	376	$682,456	11.6%
Isabella County	$1,349	1,466	$1,978,331	10.0%
Jackson County	$1,092	4,167	$4,551,100	9.2%
Kalamazoo County	$922	6,580	$6,065,118	8.7%
Kalkaska County	$2,189	670	$1,466,469	12.3%
Kent County	$999	15,120	$15,108,534	8.8%
Keweenaw County	$1,869	103	$192,545	12.2%
Lake County	$2,601	424	$1,102,923	13.1%
Lapeer County	$1,535	1,550	$2,379,532	10.4%
Leelanau County	$1,663	380	$631,858	10.9%
Lenawee County	$1,116	3,073	$3,429,173	9.3%
Livingston County	$1,205	2,992	$3,604,141	9.4%
Luce County	$1,590	227	$360,884	11.1%
Mackinac County	$1,768	380	$671,733	11.6%
Macomb County	$844	20,481	$17,287,446	8.4%
Manistee County	$1,411	804	$1,134,172	10.1%
Marquette County	$1,354	1,391	$1,883,615	10.0%
Mason County	$1,461	703	$1,026,996	10.4%
Mecosta County	$1,561	1,489	$2,324,845	10.7%
Menominee County	$1,709	782	$1,336,637	11.1%
Midland County	$1,189	1,866	$2,219,156	9.5%
Missaukee County	$2,265	550	$1,245,661	12.5%
Monroe County	$1,037	2,812	$2,916,425	9.0%
Montcalm County	$1,708	1,982	$3,386,100	10.7%
Montmorency County	$1,425	386	$550,230	10.5%
Muskegon County	$1,058	5,257	$5,563,330	9.0%
Newaygo County	$2,036	1,434	$2,919,916	11.8%

Michigan 2022
Home Energy Affordability Gap
(Published April 2023)

County_Only	Shortfall Calculation -- 150% - 184% of Federal Poverty Level			
	Individual HH Shortfall	Number of Households	Aggregate Shortfall	Home Energy Burden
Oakland County	$876	20,891	$18,295,456	8.6%
Oceana County	$2,128	1,010	$2,149,227	12.0%
Ogemaw County	$1,907	778	$1,483,688	11.8%
Ontonagon County	$1,759	270	$475,056	11.5%
Osceola County	$2,224	721	$1,603,220	12.3%
Oscoda County	$2,044	394	$805,294	11.9%
Otsego County	$1,463	611	$893,787	10.4%
Ottawa County	$1,059	5,497	$5,821,828	9.0%
Presque Isle County	$1,516	350	$530,469	10.7%
Roscommon County	$1,203	925	$1,113,083	9.8%
Saginaw County	$1,029	5,003	$5,147,357	9.1%
St. Clair County	$1,137	3,530	$4,013,730	9.3%
St. Joseph County	$1,332	1,687	$2,246,743	9.8%
Sanilac County	$1,581	1,309	$2,069,221	10.7%
Schoolcraft County	$1,930	174	$335,875	12.0%
Shiawassee County	$1,346	1,773	$2,386,816	9.9%
Tuscola County	$1,667	1,625	$2,709,211	10.9%
Van Buren County	$1,315	1,522	$2,002,155	9.8%
Washtenaw County	$875	6,849	$5,993,690	8.6%
Wayne County	$739	43,543	$32,163,432	8.1%
Wexford County	$1,777	1,098	$1,950,728	11.1%
Total Michigan	$1,073	237,763	$255,235,436	9.12%

Michigan 2022
Home Energy Affordability Gap
(Published April 2023)

County_Only	Shortfall Calculation -- 185% - 199% of Federal Poverty Level			
	Individual HH Shortfall	Number of Households	Aggregate Shortfall	Home Energy Burden
Alcona County	$1,372	191	$261,989	9.8%
Alger County	$1,716	161	$276,208	10.2%
Allegan County	$1,145	1,969	$2,254,083	8.8%
Alpena County	$979	460	$450,479	8.6%
Antrim County	$1,476	517	$762,923	9.9%
Arenac County	$1,432	215	$307,829	9.7%
Baraga County	$1,393	104	$144,907	9.7%
Barry County	$1,291	751	$969,862	9.2%
Bay County	$695	1,173	$814,753	7.8%
Benzie County	$1,510	133	$200,789	9.7%
Berrien County	$799	1,489	$1,189,162	8.1%
Branch County	$1,041	462	$480,967	8.6%
Calhoun County	$646	1,654	$1,068,806	7.6%
Cass County	$1,189	686	$815,547	9.0%
Charlevoix County	$1,153	316	$364,486	9.1%
Cheboygan County	$1,089	331	$360,446	8.8%
Chippewa County	$1,522	388	$590,449	9.9%
Clare County	$1,636	380	$621,538	10.0%
Clinton County	$1,074	653	$701,134	8.7%
Crawford County	$1,765	174	$307,072	10.7%
Delta County	$1,194	458	$546,984	9.1%
Dickinson County	$1,139	463	$527,496	9.0%
Eaton County	$911	1,090	$992,498	8.3%
Emmet County	$1,228	344	$422,410	9.2%
Genesee County	$629	5,201	$3,270,683	7.6%
Gladwin County	$1,459	423	$617,084	9.8%
Gogebic County	$1,149	285	$327,487	9.2%
Grand Traverse County	$878	827	$726,041	8.3%
Gratiot County	$1,120	598	$669,512	8.9%
Hillsdale County	$1,393	700	$974,800	9.5%
Houghton County	$1,239	486	$602,389	9.1%

Michigan 2022
Home Energy Affordability Gap
(Published April 2023)

County_Only	Shortfall Calculation -- 185% - 199% of Federal Poverty Level			
	Individual HH Shortfall	Number of Households	Aggregate Shortfall	Home Energy Burden
Huron County	$1,074	459	$492,954	8.8%
Ingham County	$612	3,386	$2,071,436	7.6%
Ionia County	$1,328	853	$1,132,999	9.1%
Iosco County	$846	416	$351,729	8.3%
Iron County	$1,526	178	$271,543	10.1%
Isabella County	$1,045	718	$750,374	8.7%
Jackson County	$786	1,647	$1,293,993	8.0%
Kalamazoo County	$619	2,973	$1,839,634	7.6%
Kalkaska County	$1,877	177	$332,281	10.7%
Kent County	$684	6,795	$4,644,570	7.7%
Keweenaw County	$1,598	24	$38,341	10.6%
Lake County	$2,273	168	$381,945	11.4%
Lapeer County	$1,222	1,009	$1,232,586	9.0%
Leelanau County	$1,360	197	$267,884	9.5%
Lenawee County	$810	995	$806,052	8.1%
Livingston County	$887	1,515	$1,344,506	8.2%
Luce County	$1,309	65	$85,070	9.6%
Mackinac County	$1,487	153	$227,573	10.1%
Macomb County	$535	8,079	$4,325,807	7.4%
Manistee County	$1,106	296	$327,248	8.8%
Marquette County	$1,054	674	$710,400	8.7%
Mason County	$1,161	497	$576,887	9.0%
Mecosta County	$1,261	483	$609,164	9.3%
Menominee County	$1,408	405	$570,119	9.6%
Midland County	$886	1,217	$1,077,751	8.3%
Missaukee County	$1,952	211	$411,863	10.9%
Monroe County	$729	1,684	$1,226,797	7.8%
Montcalm County	$1,385	904	$1,251,971	9.3%
Montmorency County	$1,144	162	$185,285	9.2%
Muskegon County	$744	2,257	$1,679,147	7.8%
Newaygo County	$1,720	685	$1,178,051	10.2%

Michigan 2022
Home Energy Affordability Gap
(Published April 2023)

County_Only	Shortfall Calculation -- 185% - 199% of Federal Poverty Level			
	Individual HH Shortfall	Number of Households	Aggregate Shortfall	Home Energy Burden
Oakland County	$571	9,594	$5,481,741	7.5%
Oceana County	$1,808	316	$571,324	10.4%
Ogemaw County	$1,613	455	$734,046	10.3%
Ontonagon County	$1,474	73	$107,616	10.0%
Osceola County	$1,908	383	$730,723	10.7%
Oscoda County	$1,736	113	$196,164	10.4%
Otsego County	$1,163	315	$366,470	9.0%
Ottawa County	$738	2,404	$1,775,166	7.8%
Presque Isle County	$1,228	210	$257,780	9.3%
Roscommon County	$921	280	$257,851	8.5%
Saginaw County	$729	2,690	$1,960,246	7.9%
St. Clair County	$833	1,892	$1,575,370	8.1%
St. Joseph County	$1,019	908	$925,176	8.5%
Sanilac County	$1,281	614	$786,305	9.3%
Schoolcraft County	$1,643	67	$110,076	10.5%
Shiawassee County	$1,040	999	$1,039,360	8.7%
Tuscola County	$1,361	670	$912,141	9.5%
Van Buren County	$1,003	855	$857,218	8.5%
Washtenaw County	$573	2,640	$1,512,343	7.5%
Wayne County	$423	18,757	$7,933,181	7.0%
Wexford County	$1,462	525	$767,719	9.6%
Total Michigan	$776	107,124	$83,174,787	7.97%

Michigan 2022
Home Energy Affordability Gap
(Published April 2023)

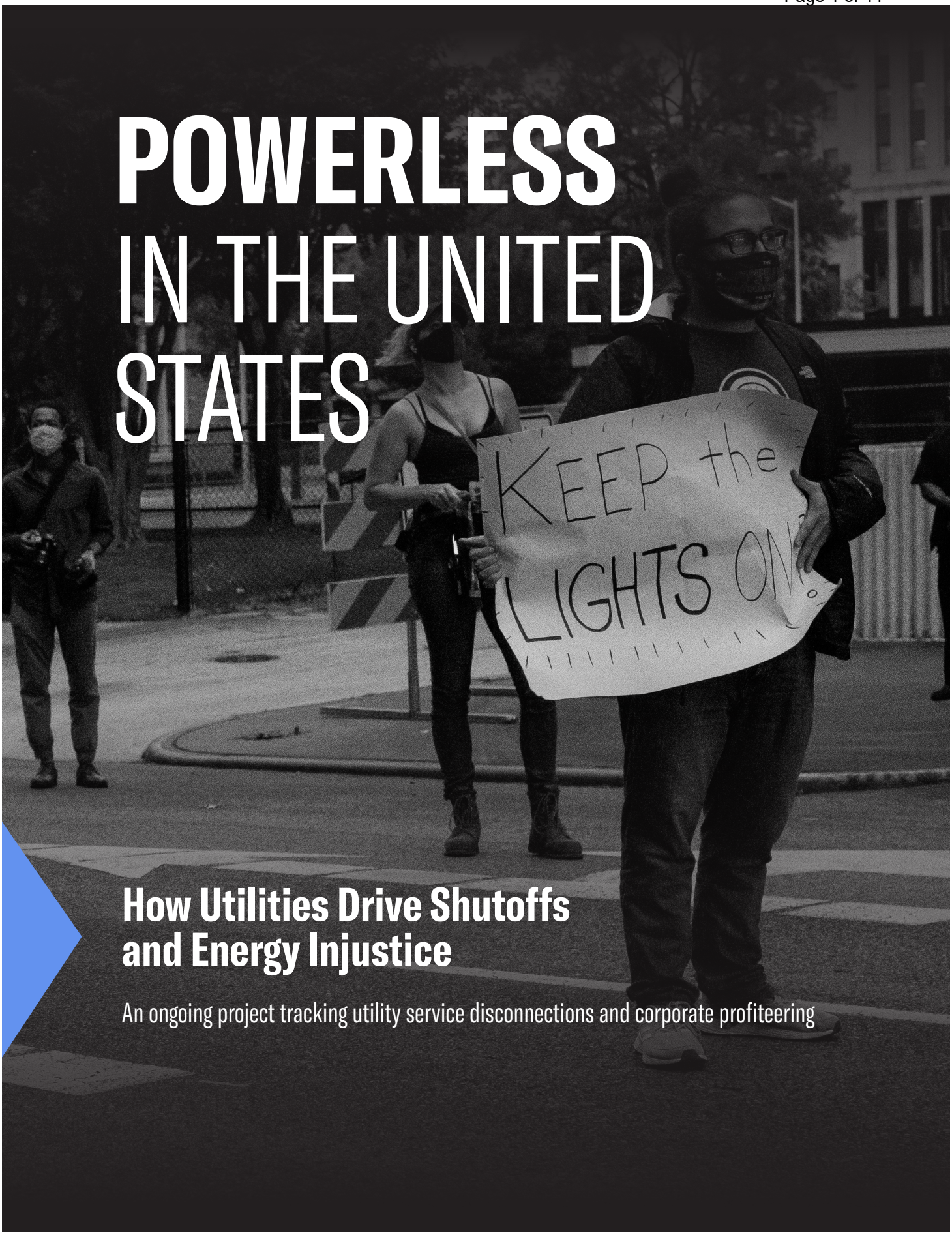
County_Only	Total Shortfall < 200% of FPL	
	Number of Households	Aggregate Shortfall
Alcona County	1,727	$3,896,395
Alger County	1,104	$2,819,291
Allegan County	11,857	$24,172,252
Alpena County	5,119	$9,513,393
Antrim County	2,988	$6,800,785
Arenac County	2,196	$5,138,270
Baraga County	1,176	$2,706,633
Barry County	5,632	$12,368,654
Bay County	14,486	$24,243,297
Benzie County	1,659	$4,131,420
Berrien County	21,889	$39,950,208
Branch County	6,184	$12,122,745
Calhoun County	18,884	$30,750,793
Cass County	5,909	$12,817,953
Charlevoix County	2,988	$5,916,307
Cheboygan County	3,854	$7,653,869
Chippewa County	5,100	$13,108,469
Clare County	5,335	$14,626,371
Clinton County	6,666	$13,677,578
Crawford County	1,970	$5,425,107
Delta County	5,283	$10,979,691
Dickinson County	3,218	$6,344,183
Eaton County	9,896	$17,654,179
Emmet County	3,410	$7,116,283
Genesee County	59,879	$99,229,249
Gladwin County	4,402	$10,370,955
Gogebic County	2,714	$5,328,974
Grand Traverse County	9,367	$17,584,399
Gratiot County	5,323	$11,071,564
Hillsdale County	6,741	$15,856,991
Houghton County	5,423	$12,232,279

Michigan 2022
Home Energy Affordability Gap
(Published April 2023)

County_Only	Total Shortfall < 200% of FPL	
	Number of Households	Aggregate Shortfall
Huron County	4,616	$8,939,940
Ingham County	39,364	$65,822,720
Ionia County	6,118	$14,055,615
Iosco County	4,690	$7,893,474
Iron County	1,869	$4,573,951
Isabella County	10,715	$23,515,907
Jackson County	18,565	$32,100,401
Kalamazoo County	33,332	$54,249,196
Kalkaska County	2,780	$7,955,602
Kent County	66,826	$110,407,723
Keweenaw County	273	$652,717
Lake County	2,104	$6,945,543
Lapeer County	8,563	$18,913,969
Leelanau County	1,698	$3,839,540
Lenawee County	11,675	$20,025,664
Livingston County	11,361	$20,157,301
Luce County	843	$1,825,553
Mackinac County	1,862	$4,445,291
Macomb County	90,061	$134,535,811
Manistee County	3,073	$6,120,587
Marquette County	8,134	$17,107,051
Mason County	4,094	$8,660,942
Mecosta County	6,590	$14,894,410
Menominee County	3,131	$7,042,671
Midland County	9,069	$16,436,527
Missaukee County	2,157	$6,113,629
Monroe County	15,152	$26,272,491
Montcalm County	8,153	$19,025,246
Montmorency County	1,680	$3,402,364
Muskegon County	23,139	$39,182,208
Newaygo County	6,843	$18,571,603

Michigan 2022
Home Energy Affordability Gap
(Published April 2023)

County_Only	Total Shortfall < 200% of FPL	
	Number of Households	Aggregate Shortfall
Oakland County	94,877	$144,692,859
Oceana County	3,869	$10,579,472
Ogemaw County	3,835	$9,602,339
Ontonagon County	992	$2,336,101
Osceola County	3,241	$9,253,892
Oscoda County	1,316	$3,397,132
Otsego County	3,185	$6,596,536
Ottawa County	22,583	$37,909,909
Presque Isle County	1,939	$4,124,482
Roscommon County	4,180	$7,730,604
Saginaw County	28,766	$50,536,135
St. Clair County	18,501	$33,673,734
St. Joseph County	7,811	$15,247,558
Sanilac County	6,311	$14,020,804
Schoolcraft County	1,204	$3,190,281
Shiawassee County	8,261	$16,073,225
Tuscola County	7,397	$17,041,311
Van Buren County	9,542	$19,282,397
Washtenaw County	37,229	$62,830,187
Wayne County	268,965	$422,350,714
Wexford County	4,728	$11,294,604
Total Michigan	1,189,641	$2,091,058,457
		$1,758



POWERLESS IN THE UNITED STATES

How Utilities Drive Shutoffs and Energy Injustice

An ongoing project tracking utility service disconnections and corporate profiteering

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Design

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INTRODUCTION

The epidemic of utilities shutting off people's electric and gas service for nonpayment has continued unabated in the months since our earlier Powerless in the Pandemic publications, which tracked utility disconnections and corporate profits since COVID-19 began.[1] Utilities shut off power to households an estimated 4.2 million times in the first 10 months of 2022.* The harm is real and self-evident, as are the solutions. Yet utility companies are still depriving U.S. households of power and heat millions of times a year while returning billions to their shareholders and executives.

The seriousness of the problem was made plain by the late December superstorm that battered the United States. Frozen gas lines and downed power infrastructure led to at least 60 fatalities and left millions of people unsafe, without power and heat — a situation that distributed renewable power generation and storage, along with a grid that moves clean electricity more efficiently, could have alleviated.

Access to electricity is a basic human right. Without it, people struggle to maintain employment and stay alive.

Access to electricity is a basic human right. People rely on electricity for water, physical safety, food security, medical care and telecommunications. When these essentials are taken away, the harm spreads like ripples across a pond. Disconnections foster instability: Without power, people struggle to maintain employment, keep their kids in school, and even stay alive. This is doubly true for the largely poor communities of color that are most vulnerable to inadequate housing and climate-driven weather extremes.

The preventable practice of disconnections keeps millions of Americans in poverty and narrows their avenues of escape. By giving utility companies the power to penalize poverty, we license them to perpetuate it.

Shutoffs allow corporate utilities to punish customers' economic precarity while guaranteeing record profits and massive payouts for themselves and their investors.

* The data cover states disconnections up until their latest month of reporting in 2022. See Methodology (Annex 3).

As this report shows, the companies most responsible for utility disconnections tend to be less profitable than their peers but spend more of their cash on executive pay — about $5.9 million per executive per year — and Wall Street dividends. It shows how a broken utility industry causes energy insecurity and hurts American people, and it outlines what federal and state lawmakers and regulators can do to fix that.

For the first time, we provide data on fossil fuel-price volatility and gas-utility disconnections, in addition to electricity shutoffs. What emerges is a vicious cycle in which shortsighted overinvestment in fossil infrastructure by utilities helps drive that price volatility and fuels the shutoff crisis. Excessive profit-taking also is a key driver of skyrocketing inflation that adds to people's economic woes.

Our work is limited by lack of data transparency. Only 60% of states require utilities to report the egregious practice of shutting off power for nonpayment. As long as utilities can hide behind industry-friendly regulators and politicians, refusing to provide clear data on their anti-consumer policies, we will never know the true scope of damage caused when companies sever service.

EXECUTIVE SUMMARY

- **UTILITIES CUT OFF POWER TO HOUSEHOLDS MORE THAN 1.5 MILLION TIMES** from January through October 2022 in the 30 states and Washington, D.C., where data was available. Extrapolating the rate of customers disconnected across all 50 states, we estimate **4.2 MILLION HOUSEHOLD DISCONNECTIONS OCCURRED ACROSS THE COUNTRY** in the first 10 months of 2022.

- **THE SHUTOFFS CRISIS IS GROWING.** We found a **29% INCREASE IN POWER DISCONNECTIONS AND A 76% INCREASE IN GAS DISCONNECTIONS** in the first 10 months of 2022 compared to the same period in 2021, among power utilities and a subset of gas utilities providing data.

- **A DOZEN COMPANIES PERPETRATED 86% OF THE SHUTOFFS** documented from 2020 through October 2022. **JUST 1% OF THEIR SPENDING ON DIVIDENDS FOR SHAREHOLDERS COULD HAVE PREVENTED ALL THEIR DOCUMENTED POWER SHUTOFFS** over that period. Those same companies spent $2.8 billion paying about 70 top executives in the three years beginning in 2019 — about $5.9 million per executive per year.

- **BY CONTINUING TO INVEST IN FOSSIL GAS AND INFRASTRUCTURE, IGNORING PRICE VOLATILITY, UTILITIES ARE DRIVING ENERGY INSECURITY AND SHUTOFFS, PARTICULARLY FOR HOUSEHOLDS OF COLOR.** Electricity prices are up about 12% since 2021, driven by the Russian war in Ukraine, utilities' reliance on fossil gas for power generation, and their ability to pass rising fuel costs directly on to customers. This economic precarity hit particularly hurts people of color; 1 in 3 families couldn't afford at least one energy bill last year.

- **THE SCALE OF THE SHUTOFFS PROBLEM IS MASKED BY A WIDESPREAD FAILURE OF TRANSPARENCY, WITH STATE REGULATORS IN NEARLY 40% OF STATES FAILING TO REQUIRE ANY DISCLOSURES.** Most notably, Florida stopped providing data in late 2021, leading to an apparent (but misleading) decrease in the number of shutoffs documented in 2022. Florida Power & Light imposed the most shutoffs — nearly 1 million — from 2020 through 2021.

- **THERE ARE MANY STEPS FEDERAL AND STATE LAWMAKERS AND REGULATORS CAN TAKE TO TACKLE THE CHRONIC DISCONNECTIONS PROBLEM.** We provide the most comprehensive policy blueprint to date of what they can do — from banning utility shutoffs to transforming the unaccountable, dirty utility system. (See Annex 1.)

FINDINGS

Electricity Disconnections Are Increasing

Utility shutoffs are spiraling out of control. Electric companies cut off power to households more than 1.5 million times from January through October of 2022 in the 30 states and Washington, D.C. where data were available. The seven worst offending utilities' disconnections equaled about 3% of their total customers. If this rate prevailed across the United States, it would suggest a total of 4.2 million household disconnections in the first 10 months of 2022.[2]

Ten states accounted for nearly 84% of the shutoffs we documented. (See Table 1.) Utilities in Illinois, Pennsylvania, Georgia, Michigan, Ohio and Missouri committed more than two-thirds of the 2022 shutoffs. Had Florida continued reporting data past October 2021 it likely would have remained at or near the top of the list.

Combining this new dataset with findings from our earlier reports, we can document a staggering 5.7 million electricity shutoffs against U.S. households from January 2020 through October 2022.

TABLE 1
STATE DISCONNECT DATA
Top 10 states

State (latest month of reporting in 2022)*	Disconnects in 2021*	Disconnects in 2022*	Change in Disconnects from 2021 to 2022	% Change in Disconnects from 2021 to 2022
Illinois (October)	225,504	284,720	59,216	26
Pennsylvania (October)	180,219	198,627	18,408	10
Georgia (October)	189,649	198,463	8,814	5
Michigan (June)	142,904	166,284	23,380	16
Ohio (May)	106,378	107,271	893	1
Missouri (September)	68,534	84,754	16,220	24
Maryland (October)	41,416	74,345	32,929	80
Connecticut (October)	153	58,945	58,792	38,426
Kentucky (June)	16,029	52,609	36,580	228
New York (October)	0	41,235	41,235	N/A
Total	970,786	1,267,253	296,467	31

**The data cover states' disconnections up until their latest month of reporting in 2022. See the Year-Over-Year Comparison section in Methodology (Annex 3) for a full explanation.*

In areas served by utilities that provided data in 2021 and 2022, the country saw a 29% increase in disconnections in the first 10 months of 2022, year-over-year. Among the 10 states with the most disconnections, the percentage increase from 2021 to 2022 was 31%.[3] (See Table 1.)

Many states with notable increases in disconnections also saw average utility bills increase sharply;[4] Missouri (shutoffs up 24%, electric bills up 24%); Kentucky (shutoffs up 228%, electric bills up 17%); and Arizona (shutoffs up 20%, electric bills up 6%).

Many pandemic-induced bans on shutoffs expired in 2021, which helped drive up disconnections. At the start of the pandemic in March 2020, 32 states and Washington, D.C., imposed a patchwork of moratoriums that barred utilities from shutting off power to people struggling with COVID-related economic disruptions. Most of the moratoriums ended in 2021, resulting in tens of thousands more disconnections in 2022 in states including Connecticut, New York and Massachusetts.

New York's COVID-related shutoffs moratorium, among the country's most ambitious, ended in December 2021.[5] In the first 10 months of 2022 New York utilities disconnected households more than 41,000 times.

Seven Utilities Perpetrated Most Shutoffs

Seven utility parent companies, operating in nine states and D.C., perpetrated nearly 70% of the shutoffs documented in 2022. They increased disconnections collectively by more than 22% over the same period in 2021: Exelon Corp. (31% increase), Southern Company (5% increase), DTE Energy (16% increase), Ameren Corp (10% increase), First Energy Corp. (20% increase), PPL Corp. (139% increase), and American Electric Power Co Inc (7% increase). (See Table 2.)

TABLE 2
UTILITIES WITH MORE THAN 70,000 SHUTOFFS
January-October 2022

Parent Company (states of operation)[6]	Disconnects 2021*	Disconnects 2022*	Change in Disconnects from 2021 to 2022	% Change in Disconnects 2021 to 2022
Exelon Corp[7] (IL, MD, PA, DC)	280,303	368,579	88,276	31
The Southern Co.[8] (GA)	189,649	198,463	8,814	5
DTE Energy (MI)	102,206	118,699	16,493	16
Ameren Corp (IL, MO)	100,539	110,688	10,149	10
FirstEnergy Corp[9] (MD, PA, OH)	81,744	98,467	16,723	20
PPL Corp[10] (PA, KY)	33,904	81,058	47,154	139
American Electric Power Co Inc[11] (OH, KY, MI, IN)	67,900	72,881	4,981	7
Total	**856,245**	**1,048,835**	**192,590**	**22**

**The data cover each state's disconnections up until their latest month of reporting in 2022. See the Year-Over-Year Comparison section in the Methodology (Annex 3) for a full explanation.*

STATE
FOCUS

ILLINOIS TOPS SHUTOFFS CHART, EXEMPLIFIES UTILITY CORRUPTION

Illinois leads the nation in electric shutoffs for nonpayment in the first 10 months of 2022 thanks to two major investor-owned utilities: Exelon's Commonwealth Edison (ComEd) and Ameren. The companies reported 225,827 and 57,588 disconnections in Illinois, respectively. Illinois' gas utilities also reported a combined 82,496 shutoffs for nonpayment last year.

Illinois is one of many states where shutoffs resumed in 2021 after the expiration of COVID-related moratoriums. In March 2021 families urged the state utility regulatory body, the Illinois Commerce Commission, to extend the moratorium:

"I am opposed to allowing Ameren and other utilities to resume shutting off services to customers during the pandemic. This is cruel and is a danger to all citizens of Illinois."

AMEREN CUSTOMER, MARCH 2021

ComEd's customers are paying more on multiple fronts. In October 2021 ComEd imposed a 26% higher supply price for electricity.[12] In addition, to pay for delivery costs including utility-owned infrastructure, ComEd sought permission from regulators to hike rates by $199 million, which it received in November 2022.[13] It pursued the case while disconnecting households' power tens of thousands of times last year.

"The moratorium on utility shutoffs is set to expire, and it is simply easier to allow that to happen. But it needs to be understood that this would cause a great deal of instability in this community. Not just for all the reasons that every other person has mentioned and will mention, but because all of those things compound and multiply one another."

AMEREN CUSTOMER, MARCH 2021[14]

The latest rate hike request was approved three months after the Illinois Commerce Commission ordered ComEd to refund $38 million to customers for using ratepayer funds as part of a bribery scheme detailed in ComEd's July 2020 deferred criminal prosecution agreement with the U.S. Department of Justice. The utility also agreed to pay $200 million to resolve the investigation.[15] The bribery scheme involved ComEd securing the passage of 2011 legislation implementing a "formula rate" system. This formula rate system exposed ComEd customers to "hundreds of millions of dollars in rate hikes over the last decade."[16] An Illinois PIRG report explained ComEd earned more than $4.7 billion than it would have without the alleged criminal scheme.[17]

STATE FOCUS

GEORGIA POWER SHUTOFFS, PROFITS RISING

Widespread power shutoffs by Georgia Power, a subsidiary of Southern Company, lifted Georgia to third place among states with the most shutoffs. The utility perpetrated 198,463 shutoffs by October 2022, on pace to exceed its 2021 total. The increase tracks rising rates charged to Georgia Power customers, a trend set to continue.

The Georgia Public Service Commission recently approved Georgia Power's request to charge customers $1.8 billion for coal-ash cleanup, rising fuel costs, and the expansion of a nuclear power plant.[18] While customers contend with bills rising nearly 12% over three years, Georgia Power insiders are giving executives and shareholders a raise. Utility regulators increased Georgia Power's allowed profit margin to the maximum 11.9%, 2% above the national average for similar utilities, according to Gina Webber, interim director of the Sierra Club Georgia chapter.[19]

Southern Company returned $2.8 billion to shareholders as dividends in 2021, exceeding the company's $2.4 billion in profits for the year. The company also awarded seven top executives compensation totaling $52.5 million in 2021, an average of $7.5 million each — the second-highest figure among our Hall of Shame after NextEra.

The latest rate increase is just one of four Georgia Power will rely on to cover accumulated costs from rising fuel prices — what utilities call an "under recovered fuel balance."[20] If regulators approve all four, the average residential customer's bill could soar by $55 to $60 a month over the next three years.[21] Georgia Power is exacerbating the problem by deepening its dependence on gas, securing power purchase agreements for 2 gigawatts of natural gas in the coming years.[22]

"Don't raise my rates. Enough. ... I can't survive like that, my businesses won't survive. I won't survive. My kids won't see generational wealth."

GEORGIA POWER CUSTOMER[23]

With rising fossil gas prices from Russia's war in Ukraine driving rate increases, regulators have an opening to broaden generation options and support customers as they adjust to higher fuel costs. Instead, in Georgia Power's latest rate case, the Georgia PSC decided against expanding Georgia Power's popular rooftop solar net metering program.[24]

NextEra, Duke Energy Among Worst Actors Amid Skewed, Hidden Data

Both NextEra and Duke Energy topped the list in 2020 and 2021 as the worst disconnection offenders among utilities that reported data. In 2022 these two utilities remained among the worst actors, even though their data was missing or skewed.

Florida utility customers were disconnected a staggering 1.48 million times between January 2020 and September 2021, making Florida the worst state for shutoffs during that period. In October 2021, however, Florida stopped requiring utilities to disclose disconnection data.[25]

Power shutoffs we were able to document (in states where transparency prevailed) declined a cumulative 42% in the first 10 months of 2022 compared to 2021. Florida's transparency failure contributed heavily to the shrinking number of confirmable shutoffs.

NextEra — owner of Florida Power & Light (FPL), the state's biggest utility — disconnected power more than 738,000 times in 2021, more than a quarter of the national total and a 67% increase over 2020. If that increase continued, NextEra would have shut off power 1.2 million times in 2022 — more than the combined total shutoffs of 2022's seven worst-offending utility companies.

NextEra's disconnections increased 67% from 2020 to 2021. If that continued, the company would have shut off power 1.2 million times in 2022.

Electricity rates have continued to climb because of a series of FPL rate hikes.[26] These higher bills can be traced directly to the rising cost of fossil gas. FPL, along with the other utilities in the state, have spent billions of dollars on fossil gas infrastructure, and fossil gas accounted for a hefty 73% of FPL's fuel mix at the end of 2020.[27] The price of gas that it pays for to run those plants has increased by 67%.[28]

Despite relatively poor financial performance (given its large market capitalization), NextEra is an outlier in spending lavishly on executives and shareholders. It paid $78.6 million to five top executives in 2021, or $15.7 million per executive, on average — by far the highest among its peers. It also spent $3 billion on dividends for shareholders that year and another $22.2 million on share buybacks that directly benefit shareholders.

In early December 2022, Florida regulators approved fuel rider increases for FPL along with multiple other Florida utilities to help them keep buying more gas amid spiking fossil gas prices. FPL customers will likely see a $5 bump in their bill. That's on top of 2021 rate increases amounting to an extra $6.82 per 1,000 kilowatt hours[29] and a four-year rate settlement allowing FPL to hike bills by at least $12 a month for many customers.[30] This enables FPL to increase its gas capacity at several power plants, along with many other operations and management expenses.[31]

Duke Energy decreased disconnections in 2022, largely because shutoffs were suspended in North Carolina after it implemented a new billing system.[32] Households continued to accrue arrearages during this temporary suspension.[33]

At mid-year, as Duke Energy resumed shutoffs in North Carolina, the utility reported roughly 9,600 disconnections in June 2022 alone — more than double the number in June 2021. South Carolina saw an even bigger increase, with 5,257 shutoffs reported in June 2022, almost three times the June 2021 figure.

Gas Prices, Disconnections Climb

A separate data set of gas utility shutoffs, including data from 42 gas utilities across 27 states and D.C., shows households were disconnected from gas nearly 384,000 times from January to October 2022, a staggering 76% increase from 2021. The top states of concern were Illinois, Pennsylvania, Missouri, Michigan and Connecticut.

These findings highlight the role rising gas prices play in compounding the struggles of energy-poor households.

TABLE 3
STATES WITH MOST FOSSIL GAS SHUTOFFS
January-October 2022

State (latest month of reporting in 2022)*	Disconnects in 2021*	Disconnects in 2022*	Change in Disconnects from 2021 to 2022	% Change in Disconnects from 2021 to 2022
Illinois (October)	31,190	82,496	51,306	164
Pennsylvania (October)	74,709	71,224	-3,485	-5
Missouri (September)	37,336	41,166	3,830	10
Michigan (June)	21,423	30,385	8,962	42
Connecticut (October)	97	28,347	28,250	29,124
Total	**164,755**	**253,618**	**88,863**	**54**

**The data cover states disconnections up until their latest month of reporting in 2022. See the Year-Over-Year Comparison section in the Methodology (Annex 3) for a full explanation.*

TABLE 4
UTILITIES WITH MORE THAN 30,000 FOSSIL GAS SHUTOFFS
2022

Parent Company (state)	Disconnects in 2021*	Disconnects in 2022*	Change in Disconnects from 2021 to 2022	% Change in Disconnects from 2021 to 2022
Ameren Corp (MO, IL)	1,003	42,736	41,733	4,161
Spire Inc (MO)	30,655	33,735	3,080	10
Southern Company[34] (IL, GA)	25,488	31,370	5,882	23
Total	**57,146**	**107,841**	**50,695**	**89**

*The data cover each state's disconnections up until their latest month of reporting in 2022. See the Year-Over-Year Comparison section in the Methodology (Annex 3) for a full explanation.

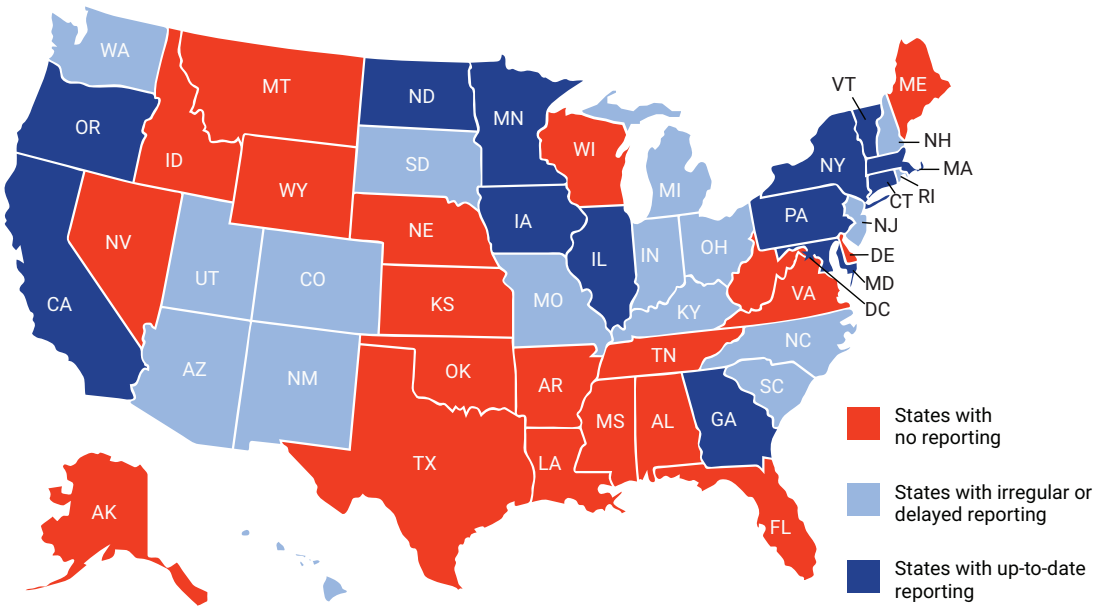
Disconnections Data Blackout Worsens

This report's data set is incomplete because there's no national requirement for utilities to publicly release information about how they disconnect households from power. In 2022 only 30 states and Washington, D.C., required utilities to publicly disclose disconnection data, leaving 40% of states unaccounted for.

The number of states requiring public disclosure decreased from 33 jurisdictions to 31 between 2021 and 2022.[35] As discussed above, the absence of information from Florida, in particular, skews the data because Florida reported the most disconnections (1.5 million) from 2020 through 2021,[36] then halted data collection in November 2021 after a pandemic-related mandate expired.

The difference in the quality of reporting requirements also muddies transparency. Only 13 states and D.C. require private utilities promptly to disclose monthly information on power shutoffs. Another 17 states have occasional or delayed disclosure, such as annual, quarterly, or time-lagged monthly reporting. This limits the ability of lawmakers, regulators and the public to understand the scale of the shutoffs problem.

FIGURE 1
STATE DISCLOSURE REQUIREMENTS ON UTILITY DISCONNECTIONS[37]



Investor-Owned Utilities Serve Wealthy Insiders at Customers' Expense

At the 12 companies most responsible for the deadly spike in shutoffs around the country, excessive dividend payouts are used to distract shareholders from executives' self-enrichment and poor financial performance. These companies perpetrated 86% of the shutoffs documented from 2020 through late 2022, a number that would have been higher had NextEra's Florida Power & Light disclosed its 2022 data. Just three companies — NextEra, Duke and Exelon — were responsible for more than half the shutoffs documented.

To understand the financial incentives driving companies to harm customers on such a vast scale, we looked at how they spend customer funds for purposes unrelated to service delivery, according to their public disclosures. We then compared their spending to a peer group of 45 companies that own utilities reporting shutoffs.[38] The 12 companies are, on average, roughly the same size as their peers, accounting for about 26% of the cohort's total market capitalization.

We discovered these Hall of Shame corporations — in addition to being the most aggressively anti-consumer — were less profitable than their peers, on average, yet prone to rewarding executives with lavish pay. Despite accounting for one-fourth of the industry by size, the Hall of Shame companies were responsible for 37% of dividends paid out and 32% of disclosed executive pay from 2019-2021.[39] They brought in only 13% of the peer group's profits.

Our analysis reveals a system that functions as a one-way financial stream, drawing

dollars away from customers and toward executives and Wall Street investors. Given the companies' focus on paying insiders and investors, it is not surprising that those most focused on self-enrichment tend to be harshest toward customers who fall behind. With profits at the core of their mission, these companies have no incentive to mitigate the harm caused by service shutoffs.

The companies in this group are: NextEra Energy Inc., Duke Energy Corp., Exelon Corp., The Southern Co., American Electric Power, DTE Energy Co., AES Corp., Ameren Corp., CMS Energy Corp., Emera Inc., FirstEnergy Corp., and PPL Corp. Among the states where they operate: Florida, Georgia, Illinois, Indiana, Kentucky, Maryland, Missouri, Michigan, New Mexico, North Carolina, Ohio, Pennsylvania, South Carolina and Washington, D.C.

SOME KEY FINDINGS

- **DISCONNECTIONS ARE INCREASING.** The companies increased their disconnections by 1.3 million from 2020 to 2021. By October 2022 most were on track to finish the year with more disconnections than 2021.
- **LESS PROFITABLE.** From 2019 through 2021, these 12 companies generated only about half the net income of their peers, on average — $4.9 billion, versus $9.9 billion across all 45 utility parent corporations.
- **HIGHER DIVIDENDS.** Hall of Shame companies each spent $4 billion paying dividends to shareholders from 2019-2021, on average — about 140% of the average dividend spending by the broader utility industry in the same period.
- **PLENTY OF CASH TO PREVENT SHUTOFFS.** These 12 companies could have forgiven all 4.9 million documented shutoffs 90 times over using their dividends from 2020 through the third quarter of 2022 — **TOTALING TO JUST 1% OF THE AMOUNT OF THEIR DIVIDENDS.**[40]
- **MASSIVE EXECUTIVE PAYOUTS.** The 12 companies collectively paid roughly 70 top executives[41] $1.2 billion in the three-year period examined, or about $5.9 million per year to each named executive. That's 15% more than the average across peer companies.[42]
- **NEXTERA A STANDOUT.** Among utility-only parent corporations,[43] NextEra reported the highest average pay per executive ($11.2 million) and second-highest spending on dividends ($8.1 billion, after Duke Energy's $8.6 billion).

TABLE 5
HALL OF SHAME UTILITIES

Parent Company (state)	Total Cumulative Disconnects (2020 through October 2022)	Cost to Prevent Disconnects	Dividends (2020 through Q3 2022)	Dividends/ Cost to Prevent Disconnections
Exelon Corp[44] (IL, MD, PA, DC)	743,040	$78,762,240	$3,988,000,000	51x
The Southern Co.[45] (GA)	538,841	$57,117,146	$7,628,000,000	134x
DTE Energy (MI)	377,492	$40,014,152	$2,065,000,000	52x
Ameren Corp (IL, MO)	293,719	$31,134,214	$3,401,400,000	109x
FirstEnergy Corp[46] (MD, PA, OH)	239,527	$25,389,862	$2,361,000,000	93x
PPL Corp[47] (PA, KY)	195,555	$20,728,830	$3,174,000,000	153x
American Electric Power Co Inc[48] (OH, KY, MI, IN)	373,065	$39,544,890	$4,156,900,000	105x
Duke Energy Corp (FL, IN, KY, NC, SC, OH)	602,068	$63,819,208	$8,315,000,000	130x
NextEra Energy Inc[49] (FL)	1,180,212	$125,102,472	$8,274,000,000	66x
AES Corp[50] (IN, OH)	152,756	$16,192,136	$1,098,000,000	68x
CMS Energy Corp[51] (MI)	148,708	$15,763,048	$1,386,000,000	88x
Emera Inc[52] (FL)	85,163	$9,027,278	$1,346,000,000	149x
TOTAL	**4,930,146**	**$522,595,476**	**$47,193,300,000**	**Average 90x**

Utility Industry Profits During COVID Pandemic

The pandemic years were massively lucrative for corporate owners of private utilities. The 45 companies examined raked in $184.8 billion in profits in 2021, a 71% increase from 2020. Even in 2020, the toughest of the three years analyzed, all but four were profitable.

From 2019 through 2021, the companies posted total profits of $447.8 billion. They spent $3.8 billion paying top executives and $239.5 billion on buybacks and dividends — returning 54% of their profits to insiders and shareholders. By contrast, the Hall of Shame companies spent 83% of their profits on executive pay, dividends and buybacks during the same period.

The $76.5 billion (71%) year-over-year profit increase in 2021 amounts to more than $28,000 for each of the 1.25 million shutoffs committed in 2021. These increasing profits are a root cause of inflation, accounting for a rising portion of price growth, according to a recent study by the Economic Policy Institute.[53]

When executives offer shareholders aggressive profit-sharing, shareholders are less prone to rebel against weak financial performance and excessive executive pay. After overinvestment in gas infrastructure led to ballooning fuel costs, the solution was to charge customers more, not to distribute funds away from the executives who made those calamitous decisions.

MASSIVE PAY AT NEXTERA

Florida Power & Light parent corporation NextEra is an outlier in its harsh anti-consumer shutoff policies as well as its rapacious spending to enrich insiders and investors.

In 2021 the company spent a staggering $78.6 million paying five executives, up 59% from 2020. Then-CEO James L. Robo made $25.3 million, and two others received pay packages each totaling more than $15 million. NextEra spent an additional $291,398 in 2021 on perks for the five executives, including home security, company cars, and a $25,000 “perquisite allowance” to CFO Rebecca J. Kujawa. About $30,000 went to current CEO John W. Ketchum’s personal use of company aircraft.

NextEra’s spending on executive compensation alone in 2021 amounted to $67 for each time they cut off people’s power.

FACTORS DRIVING SHUTOFFS EPIDEMIC

Energy Burdens and a Racist Energy System

When utility bills go unpaid, it is because people are making difficult choices about where to put their limited money. The less income a family has, the higher the percentage that goes to fixed bills like energy, housing and internet. As energy prices rise, energy bills consume an even greater share of families' earnings — known as energy burden.[54]

Crippling energy burdens are not a new phenomenon, but they are worsening, particularly for families of color. Last year more than 20% of families couldn't afford to pay at least one energy bill. The rate was 50% higher (31%) for households of color. [55] COVID-19 turned this crisis into a fatal catastrophe. A national moratorium on utility shutoffs would have reduced COVID-19 deaths by 15%, Duke University researchers found.[56]

Communities of color bear the brunt of energy insecurity. Decades of discrimination have left communities of color in structurally deficient housing that costs more to heat and cool.

Communities of color bear the brunt of energy insecurity.[57] The median energy burden of Black households is 43% higher than that of white households. For Native American households it's 45% higher, and for Latino households it's 20% higher.[58]

The legacy of racist redlining — official and unofficial collusion to concentrate racial groups in certain neighborhoods — compounds the risks. Decades of discrimination have left communities of color in structurally deficient housing that costs more to heat and cool.[59] Formerly redlined neighborhoods are today on average 5 degrees Fahrenheit hotter in summer than areas once favored for housing loans. The climate emergency is worsening these conditions.

Though shutoffs are the most severe form of punishing the poor, struggling individuals and families also suffer the impacts of utility debt accumulation — the step before disconnection. Arrearages limit purchasing power and hurt credit scores, preventing people from obtaining home loans and good jobs. Utility companies burden people with unsustainable obligations that relegate them to perpetual poverty. Total U.S. arrearages for electricity and heating bills were estimated at $16 billion in August 2022.[60]

STATE
FOCUS

MICHIGAN'S DTE ENERGY: PREDATORY COLLECTION PRACTICES

DTE Energy provides electricity and gas to customers in Michigan through its subsidiaries DTE Electric and DTE Gas. It reported 128,806 electric and gas disconnections in 2022. In a comment urging Michigan's utility regulators to deny DTE Energy's latest rate hike request, one customer decried the company's "shameful conduct."[61]

Whether it's the "middle of winter, heat of summer, DTE doesn't care. No thought or respect to consumers; shameful conduct generally."

DTE CUSTOMER WHO WAS DISCONNECTED THREE TIMES FOR OWING LESS THAN $200 [62]

As rising fossil gas prices drive rate increases for DTE customers,[63] the company has distinguished itself with a particularly predatory, anti-consumer practice: selling customers' debt to litigious collections agencies.

DTE Energy quietly sold the debt of 290,000 residential customers and nearly 14,000 commercial accounts in 2017, according to an investigation by Outlier Media and ProPublica.[64] DTE is the only utility in the Great Lakes states of Illinois, Indiana, Michigan, Minnesota, Ohio and Wisconsin to sell customers' debt, the report found. And DTE sold the debt for cheap, receiving just $4.8 million from debt collectors now entitled to collect more than $282 million.

DTE customers have had their wages garnished and tax refunds seized by debt collectors. In response to the investigation, a spokesperson for the Michigan Public Service Commission said state law prohibits regulators from making utility management decisions more pro-consumer.[65]

Fossil Fuel Price Volatility and the Broken Utility Business Model

Household disconnections are trending higher because of rising methane gas energy prices and inflation. Electricity prices jumped 12% in the past year.[66]

Fossil gas has been a hotspot of price volatility. As of September 2022, the Henry Hub spot price of methane gas had risen 310% over two years.[67] The wholesale price of U.S. fossil gas tripled from the summer of 2020 to the summer of 2021 alone.[68] The Energy Information Administration expects the price to increase even more this winter, resulting in high electricity and heating gas prices driven by rising methane gas prices.[69]

As utilities continue investing in fossil fuel infrastructure, they guarantee price volatility will burden consumers while shareholders keep profiting.

This price spike is driven by a familiar boom-and-bust cycle in fossil fuel commodity markets. As the pandemic eased and businesses reopened, demand for fuel rebounded sharply. Oil and gas producers, meanwhile, were slow to respond with increased supply that would have lowered prices and profits.[70] Instead they focused on pleasing investors and avoiding risky capital investment, with price-gouging and hefty dividends ensuring massive profits and satisfied shareholders.[71]

Fossil gas markets lurched in early 2022 as Russia's war on Ukraine led to reduced Russian gas exports to Europe, resulting in a bidding war for limited global supplies of liquified natural gas (LNG). Overseas buyers snapped up a growing share of the LNG produced by newly commissioned U.S. export facilities. The result: The United States is exporting more than one-fifth of all the gas it produces, the most ever.[72]

America's surge in lucrative fossil gas exports is incentivizing a dramatic, years-long expansion of dangerous fossil fuel infrastructure beyond what is required to thwart Europe's immediate energy crisis.[73] The expansion locks in methane emissions and air pollution for decades to come, endangering communities and ecosystems at the sites of fossil gas extraction, pipelines and exports.

Unfortunately, it's consumers who are paying for the volatility of dirty energy prices. Utilities purchasing fossil gas for electricity and gas heating pass higher fuel costs onto consumers in the form of fuel riders. This practice of shifting rising costs onto customers results in higher bills for households.[74] Fuel riders were a popular tool among the utilities with the highest disconnections in 2022.[75] They allow utilities to rely more heavily on gas plants, because customers pay for the fuel regardless of the cost.

In a self-reinforcing downward spiral, rising fossil fuel prices were a major driver in record inflation,[76] which skyrocketed from 1% in January 2021 to 8% in August 2022.[77] Rising inflation without equally rising pay has meant that a household's dollar is stretched even thinner. The resulting higher heating and electric bills are a major contributor to the epidemic of service disconnections discussed here.

This winter, consumers — especially low-income families reliant on fossil gas — are bearing the brunt of this volatility. Heating a house with fossil gas this winter is expected to cost 66% more than it did two years ago. Electricity prices have also risen approximately 12% compared to 2020.[78] The average family could pay more than $1,200 to heat their home this winter — $175 more than last winter and $300 more than the 2020 winter.[79]

As utilities continue to invest in methane gas infrastructure, they are guaranteeing that gas price volatility will continue to burden consumers while shareholders continue to profit.

TABLE 6
ESTIMATED WINTER HEATING COSTS
2020-21 to 2022-23

Winter Heating Season	Natural Gas	Electricity	Heating Oil	Propane	All Fuels
2020-21	$573	$1,191	$1,212	$1,158	$888
2021-22	$709	$1,242	$1,876	$1,587	$1,025
2022-23	$952	$1,328	$2,115	$1,828	$1,202
% Difference, 22-23 vs. 21-22	34%	7%	13%	15%	17%
% Difference, 22-23 vs. 20-21	66%	12%	75%	58%	35%

Assumes same consumption in 2022-23 as 2021-22

Data Source: National Energy Assistance Directors' Association, September 2022, available at https://neada.org/wp-content/uploads/2022/09/winter2022-23PR.pdf

Climate Emergency Increases Energy Fragility

Heat waves, freezes and floods in 2022 spotlighted how climate-driven extreme weather boosts demand for electricity and heat, exacerbating the threat of utility disconnections. It also showed the brittleness of a centralized fossil fuel system.

More than half the U.S. was under an extreme heat watch or warning during the summer months.[80] Energy demand for cooling increased as a result.[81] Although 41 states limit utility shutoffs during extreme cold weather events, only 18 do so during heat waves.[82] January 2022's deadly climate-driven superstorm — which put half the country on deep freeze alerts and led to freezing of gas supplies and rolling power outages — also drove up demand and prices for fossil gas.[83]

The climate emergency also reinforces energy insecurity among poor households and communities of color, which are "less able to prepare for, respond to, and recover from disaster events."[84] Rebuilding can lead to insurmountable costs, making it even more difficult to keep up when utility bills return.

The climate emergency reinforces energy insecurity among poor households and communities of color, which are less able to prepare for, respond to, and recover from disaster events.

Kentucky and Missouri exemplify this pattern. Both states experienced severe flash floods in 2022 and have above-average-to-high poverty rates of 16% and 12%, respectively.[85] Disconnections in both states increased significantly in 2022 over 2021.

The recent 2022 winter superstorm, like all climate disasters, spotlights the racial inequity of climate impacts and recovery efforts. Blacks suffered disproportionate fatalities, accounting for half of the deaths reported in Buffalo in late December, and appeared to receive slower restoration of power and roads than their white counterparts.[86]

When power shutoffs have been at the utility's discretion in response to climate-fueled disasters, communities of color have been disproportionately targeted. For example, during the 2021 winter storm in Texas, "areas with a high share of minority population were more than four times as likely to suffer a blackout than predominantly white areas."[87]

This pattern of recovery inequity is consistent with federal relief efforts, where the Federal Emergency Management Agency has disproportionately denied assistance to poor communities of color.[88] Inequitable recovery means that households denied assistance take longer to return to economic security and pay bills on time.

ANNEX 1: POLICY RECOMMENDATIONS

Lawmakers and regulators must finally address the multiple and complex roots of the utility disconnections crisis. Here are some key policy avenues to begin improving the electric utility sector and ending the racist fossil energy system driving this chronic problem.

Require Utilities to Disclose Disconnections, Other Key Data.

To understand the full scale of the shutoffs pandemic, all public and private utilities[89] should be required to publicly report data on disconnections at least monthly. Disclosure should be paired with data showing which communities are impacted and how, including but not limited to: dollar amount of arrearages and late fees collected; number of customers participating in deferred payment programs, and the success and failure of these programs; reconnections and reconnection fees; duration of disconnections; ZIP code and demographic data of disconnected households; and energy burdens of disconnected households.

Federal pathways: The U.S. Energy Information Administration has the authority to establish a federal reporting database on household disconnections and other relevant data.[90] Congress can also mandate the creation of a federal database and charge an agency to act.

State pathways: State utility commissions,[91] legislators[92] and governors have broad authority to collect data on disconnections and other key data.

Ban Utility Shutoffs, Other Punitive Measures Against the Poor.

The utility industry's custom of shutting off power punishes people for being poor. This barbaric practice — and related punitive measures, like resale of debt to predatory private companies — must end.

Federal pathways: ***Congress*** should enact a nationwide ban on utility shutoffs and other punitive collection practices for unpaid household utility bills for households meeting poverty criteria,[93] expanding upon a nationwide moratorium on shutoffs passed under the House's HEROES Act and proposed Senate legislation during COVID-19.[94] In September 2022 Reps. Cori Bush, Rashida Tlaib and Jamaal Bowman introduced a resolution recognizing the human right to electric, water and broadband utilities.[95] There is international precedent for broad shutoff bans and for treating electricity as a human right.[96]

State pathways: If Congress does not act, ***governors, state legislators and/or state utility commissions*** should impose permanent state moratoriums on utility shutoffs for nonpayment for consumers who meet established poverty criteria and who cannot pay their bills. At a minimum they should enact temporary moratoriums for climate-driven extreme weather conditions like heat waves, which drive up energy demand, as well as reconnection criteria that prioritize low-income communities when climate disasters drive power outages. States should also establish shutoffs protections for vulnerable populations, including households with elders, infants, and seriously ill persons.

Debt Relief, Federal Assistance, Equity Reforms.

While stopping the immediate harms of debt and shutoffs, policymakers should advance ideas that lower energy burdens.

Federal pathways: ***Congress*** should vastly increase funding for the Low-Income Home Energy Assistance Program (LIHEAP), which provides energy bill assistance, and the Weatherization Assistance Program (WAP), which helps people afford energy efficiency upgrades, a more durable solution.[97] Administering agencies such as the ***Health and Human Services Department, Department of Energy,*** and ***Department of Housing and Urban Development*** should also improve methods of funding deployment to efficiently and effectively reach eligible households.[98]

Congress should also address mounting arrearages — which, according to NEADA, have doubled from 2019 to an estimated $20 billion[99] — and design debt-elimination programs for all affected customers, or for a qualifying class of low-income households, using student loan cancellation as a model. Congress should tax utility profits to pay off the debt.

State pathways: ***State legislators*** should work with Congress to design debt relief programs, either retiring balances on a one-time basis or gradually reducing payments.[100] New York recently enacted major debt forgiveness for utility debt accumulated during the COVID pandemic.[101] States should also tax utility profits to pay off the debt.

State utility commissions should make bills more affordable by, among other things,[102] establishing payment plans based on percentage of income and providing ways to decrease past-due balances, effectively capping families' monthly liabilities. These steps would protect them against fuel riders and unexpected energy price hikes due to climate-driven weather extremes and fossil fuel price volatility.[103] Regulators should also consider factoring in energy

burdens, energy insecurity, energy poverty and other environmental justice factors when deciding whether utility rates are "just and reasonable."[104]

State utility commissions should halt ineffective and unjust prepayment plans. These plans, where a customer pays for electricity or gas in advance, generally allow the utility to disconnect customers who do not refresh their prepayments, sometimes without reporting the disconnection.[105]

State utility commissions should routinely examine safeguards on alternative energy suppliers.[106] Several states with high disconnections allow alternative retail suppliers, which consumer advocates have found leads to higher prices.[107]

Ditch Fossil Fuels for a Clean, Just, Accountable Energy System

The country must address the underlying conditions that brought us to this point: profit-seeking companies whose business models favor fossil fuel buildout; poor regulation and regulatory capture; and high dollar influence-peddling. Fighting the climate emergency presents a tremendous opportunity to build new energy systems that are nonpolluting, distributed, climate-resilient, affordable and politically accountable. Distributed energy resources (DERs) — including rooftop and community solar paired with energy storage, demand-side management, and energy efficiency technologies — can deliver on multiple fronts to redress chronic energy injustice if deployed equitably.

As a foundation for state-level reform, public utility commissions need fundamental transformation to be held accountable to the public, as detailed by the Chisholm Legacy Project.[108]

In passing the 2022 Inflation Reduction Act, Congress provided necessary clean energy tax incentives, but lawmakers at both state and federal levels must hold utilities accountable and stop their obstruction of clean energy, energy efficiency, and other alternatives that will power a just energy future.

Federal Pathways: The ***Biden administration*** should phase out the country's reliance on fossil fuels, including halting new fossil fuel production and infrastructure using existing executive powers.[109]

The ***Federal Trade Commission*** should heed public calls for an industry-wide investigation of the electric industry's abusive practices that stifle renewable energy competition and undermine consumer protection.[110] The ***Federal Energy Regulatory Commission*** should block utilities from spending ratepayers' funds on anti-environmental political lobbying.[111]

Congress should enact measures prioritizing the development of distributed and community-owned solar and storage in environmental justice communities; it should support alternative models of accountable public power.[112] ***The Biden administration*** should implement distributed energy measures to meet its Justice40 initiative goals, which commit to deliver 40% of federal investments "in climate and clean energy to disadvantaged communities."[113]

Congress should pass laws to curtail disastrous ongoing subsidies that keep the fossil fuel industry afloat and tax the industry's windfall profits, including the Big Oil Windfall Profits Tax Act.[114]

State Pathways: ***State utility commissions*** should adopt strong utility accountability mechanisms, including performance-based ratemaking that rewards utilities for their performance rather than for building new infrastructure.[115] This should include making utilities bear the cost of fossil fuel price volatility instead of passing it on to ratepayers.[116]

State utility commissions should oppose utility efforts to impose fixed charges and related measures, such as gutting net energy metering, and making it harder for rooftop solar, community solar and other decentralized energy solutions to thrive.[117] ***State legislators*** should establish distributed rooftop and community solar programs and energy efficiency programs that prioritize environmental justice communities with direct grants and financial assistance.[118] Those who suffer the brunt of the racist fossil energy system should be the first to receive access to clean, affordable, resilient energy.

State and local governments can explore alternative systems of accountable public and community-owned power, as in New York[119] and Maine.[120]

ANNEX 2

The full utilities data table can be found here.

TABLE 7
HALL OF SHAME
Cumulative Disconnects, January 2020-October 2022

Parent Company (electric)	Utility	Total Disconnects 2020	Total Disconnects 2021	Total Disconnects 2022 (through Oct)	Cumulative Total Disconnects 2020 to Oct 2022
Exelon Corp (IL, MD, PA, DC)	Commonwealth Edison	50,380	177,887	225,827	454,094
	PECO Energy Co	59	76,487	67,359	143,905
	Baltimore Gas and Electric Company	7,902	27,846	60,659	96,407
	Pepco Holdings Inc	6,700	18,058	8,849	33,607
	Potomac Electric Power Company	3,238	0	3,810	7,048
	Delmarva Power	1,344	4,560	2,075	7,979
Exelon Corp Total		**69,623**	**304,838**	**368,579**	**743,040**
The Southern Co. (GA)	Georgia Power	103,330	237,048	198,463	538,841
The Southern Company Total		**103,330**	**237,048**	**198,463**	**538,841**
DTE Energy (MI)	DTE Energy	80,606	178,187	118,699	377,492
DTE Energy Total		**80,606**	**178,187**	**118,699**	**377,492**
Ameren Corp (IL, MO)	Ameren Illinois	22,830	55,960	57,588	136,378
	Ameren Missouri	36,515	67,726	53,100	157,341
Ameren Corp Total		**59,345**	**123,686**	**110,688**	**293,719**
FirstEnergy Corp (MD, PA, OH)	Metropolitan Edison Company	71	26,941	27,289	54,301
	West Penn Power Company	22	16,147	20,164	36,333
	Pennsylvania Electric Company	4	20,354	19,573	39,931
	Ohio Edison Company	5,799	34,505	13,054	53,358

Parent Company (electric)	Utility	Total Disconnects 2020	Total Disconnects 2021	Total Disconnects 2022 (through Oct)	Cumulative Total Disconnects 2020 to Oct 2022
	The Cleveland Electric Illuminating Company	1,403	12,831	8,240	22,474
	The Toledo Edison Company	2,205	18,069	6,886	27,160
	Pennsylvania Power Company	0	2,416	3,083	5,499
	Potomac Edison	67	226	178	471
FirstEnergy Corp Total		**9,571**	**131,489**	**98,467**	**239,527**
PPL Corp (PA, KY)	PPL Electric Utilities Corporation	0	30,843	32,720	63,563
	Kentucky Utilities Company	15,025	30,043	27,572	72640
	Louisville Gas and Electric	15,031	23,555	20,766	59,352
PPL Corp Total		**30,056**	**84,441**	**81,058**	**195,555**
American Electric Power Co Inc (OH, KY, MI, IN)	Ohio Power Company	65,568	162,644	59,694	287,906
	Indiana Michigan Power Company	27,519	34,347	10,057	71,923
	Kentucky Power Company	1,970	8,136		13,236
American Electric Power Co Inc Total		**95,057**	**205,127**	**72,881**	**373,065**
Duke Energy Corp (FL, IN, KY, NC, SC, OH)	Duke Energy Carolinas, LLC	50,107	34,764	30,029	114,900
	Duke Energy Progress, LLC	49,757	61,377	14,086	125,220
	Duke Energy Ohio	12,566	40,526	6,436	59,528
	Duke Energy Indiana, LLC	25,233	45,426	6,346	77,005
	Duke Energy Kentucky Inc	2,307	7,657	1,141	11,105
	Duke Energy	78,396	135,914	0	214,310

Parent Company (electric)	Utility	Total Disconnects 2020	Total Disconnects 2021	Total Disconnects 2022 (through Oct)	Cumulative Total Disconnects 2020 to Oct 2022
Duke Energy Corp Total		**218,366**	**325,664**	**58,038**	**602,068**
NextEra Energy (FL)	Gulf Power	4,308	44,170	0	48,478
	Florida Power & Light Company	437,385	694,349	0	1,131,734
NextEra Energy Total		**441,693**	**738,519**	**0**	**1,180,212**
AES Corp (IN, OH)	Dayton Power and Light Company	7,249	20,943	6,912	35,104
	Indianapolis Power & Light Company	37,103	75,769	4,780	117,652
AES Corp Total		**44,352**	**96,712**	**11,692**	**152,756**
CMS Energy Co (MI)	Consumers Energy	24,511	80,849	43,348	148,708
CMS Energy Co Total		**24,511**	**80,849**	**43,348**	**148,708**
Emera Inc (FL)	Tampa Electric Company	44,464	40,699	0	85,163
Emera Inc Total		**44,464**	**40,699**	**0**	**85,163**

ANNEX 3: METHODOLOGY

To compile the data for this report, the authors reviewed available disconnection data for all 50 states, Washington, D.C., and Puerto Rico from January 2022 through October 2022. Disconnection data was retrieved by reviewing state and territory utility dockets and calling state commissions where the data was not identifiable online or where public information requests were necessary.

Dataset

The resulting data set includes shutoff data from 30 states and the District of Columbia, where they were made available. Of these, only 13 states and D.C. require utilities to disclose monthly information on power shutoffs. Another 17 states require occasional or delayed disclosure (e.g. annual, quarterly, or time-lagged monthly reporting).

States began reporting data at various times. In many cases the reporting started in early 2020 because of state requirements to disclose disconnection data in response to COVID-19. In a handful of states, these measures have expired — most notably Florida, which reported the most shutoffs in 2021.

Regulators in 20 states and Puerto Rico do not require their utilities to track and publicize the number of times they shutoff households' power every year.

Cumulative data were compiled by combining 2022 findings with data from our earlier reports in this series.

Adjustment to Exclude Rapid Reconnections

Reconnection data for all 50 states, Washington, D.C., and Puerto Rico were reviewed. Reconnection reporting requirements varied by state. Some states did not require any reconnection reporting, while others did not indicate the time from disconnection to reconnection. Where we could prove power was reconnected within 24 hours of disconnection, we excluded these cases from utilities' disconnect totals in those months.

We deemed reconnections within 24 hours to mitigate the impact of a disconnect but considered longer periods without service too harmful to be excluded. Being without electricity for more than 24 hours can render homes uninhabitable and prove life-threatening due to inoperability of lifesaving medical equipment, temperature extremes, and similar outcomes. Reconnections with no specified time frame were recorded and not subtracted from disconnection totals.

Utility Service Type

The disconnection data set delineates gas and electric utilities under the column titled *Service Type*. However, while several utilities separate electric and gas disconnections in their docket compliance filings, others do not. Those that do not are listed as "gas/electric" in our dataset and their shutoffs are treated as electric disconnections.

Customer Class

Although our data is focused on tracking residential utility disconnections, several states and utilities do not distinguish between residential and commercial customer classes in their filings. Since most of these utilities' customers are residential, we erred on the side of over-inclusion and used values that may include some nonresidential disconnections.

Year-Over-Year Comparisons

For this report we collected data from January through October 2022. For earlier iterations of this report, we had full-year data sets (covering January through December 2020 and 2021). To ensure accurate apples-to-apples comparisons of year-over-year data, we compared datasets during the same time periods across years.

Moreover, as states with disconnection data differed in their latest month of reporting, year-on-year comparisons were state-specific and compared data made available in 2022 against the same period in 2021. For example, for states that disclosed data from January through October 2022, data from January through October 2021 was used as a comparison, as opposed to all of 2021. For states that only had data through March, like Arizona and South Dakota, January through March 2021 was used as a comparison for January through March 2022. The aggregated totals for 2022 thus represent all the available data, but for Tables 1-4 the data for 2021 only includes disconnections from each respective state's reporting period.

Extrapolation

In our findings section, we extrapolated disconnection and residential customer data from our top seven utilities to estimate how many times utilities disconnected customers across the country, including in states where there is no reporting. Specifically, we took an average of the top utilities' disconnection rates and applied it to the total number of utility customers in the country (139,780,608).[121] This approximation comes with a few caveats, including that households can be disconnected multiple times. That limits the precision of a result based on multiplying disconnection rates by the total number of U.S. households. Specifically, total disconnects may account for a smaller percentage of a utility's base of

customers if some households are experiencing chronic energy insecurity and experience frequent shutoffs throughout the reporting period.

Financial Data

As a proxy for the average cost to cover a customer's unpaid bill, we used the average U.S. monthly residential electric utility payment of $106, as determined by Vote Solar.[122] The utility industry standard is to initiate shutoff procedures after one month of nonpayment.[123] Utility parent corporations were reviewed in Bloomberg to determine if they were publicly traded or privately held entities. Corporate financial data for the publicly traded corporations, including profits, dividends, share buybacks, and executive compensation, were pulled from publicly available 10-K and DEF 14A filings retrieved from the SEC's EDGAR database.

Corporate share buyback data for publicly traded companies listed in the United States is reported as a dollar value of shares repurchased per quarter. Foreign companies are not subject to the same reporting requirements, do not report repurchased shares, or only report the number of shares, not the value of those shares. Buybacks reported as a number of shares were excluded from the report due to the inaccuracies that would arise from assuming an average trade price.

ENDNOTES

1 Su, Jean & Christopher Kuveke, Powerless in the Pandemic 2.0, Center for Biological Diversity, BailoutWatch & Tiger Moth LLC (April 2022), https://bailout.cdn.prismic.io/bailout/ddebd6e2-b136-4dc8-a1da-f6d4583b4c24_Powerless_Report2022_final.pdf; Su, Jean & Christopher Kuveke, Powerless in the Pandemic, Center for Biological Diversity & BailoutWatch (September 2021),https://bailout.cdn.prismic.io/bailout/973caeea-9a3f-4b46-bc1c-68eb8cf63b33_Powerless_Report_v5.pdf; Ryan, Greer, Power Crisis, Center for Biological Diversity (June 2021), https://www.biologicaldiversity.org/programs/energy-justice/pdfs/Power-Crisis-Report-June-2021.pdf

2 U.S. EIA, Annual Electric Power Industry Report (2022), https://www.eia.gov/survey/form/eia_861/form.xlsx.

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Predatory lenders are making money off rising gas and food prices

By Nicole Goodkind, CNN Business

7 minute read · Updated 4:00 PM EDT, Thu June 30, 2022

New York (CNN Business) — In the last few months, Yumekia Jones, a legal assistant at the Mississippi Center for Justice's Indianola office, has fielded an unusually high number of calls — a roughly 400% spike — from people in dire need of immediate financial assistance.

Most want to avoid payday loans, which offer quick cash against future paychecks without a credit check and come with an interest rate above 500%. But the rapidly increasing prices of food, fuel and rent gives them few options.

Inflation rates are at a 40-year high and unemployment is near a half-century low. To most economists those two realities spell out significant economic trouble.

To payday lenders, however**,** they signal happy days and good times ahead.

"Low unemployment plus inflation generally mean consumers may need loans for additional capital to manage through unexpected spikes and expenses while earning money to pay back these loans," said David Fisher, CEO of short-term, subprime lender Enova said during an earnings call in May. The company, an online-only lender, beat quarterly earnings estimates by 7.7%.

Enova declined to comment for this story.

Given the economic dynamics at play, Fisher said his company has "meaningfully leaned into the demand with our marketing efforts," and spent more to attract new customers. That has paid off. About 44% of all loans were issued to new customers in the last quarter, he said.

That increase in first-time borrowers came as US consumer inflation reached its highest level in more than four decades and Americans struggled to put food on their tables and gas in their tanks.

Working to drive to work

The national average for a gallon of gas stands at just under $5, a 61% increase since last year. The jump comes just as many employers are requiring workers to return to in-person work. The federal

minimum wage, meanwhile, still stands at $7.25 per hour, where it's been since 2009. Low-wage workers must labor for about 14 hours to fill up their tank.

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About two thirds of Americans now live paycheck to paycheck, a June LendingClub su
That number jumps to 82% among workers earning less than $50,000.

The average credit score for low-earners in the US is also dropping, according to LendingClub data. About 40% of Americans earning less than $50,000 and living paycheck to paycheck have a subprime credit score of below 650 making it difficult for them to get a loan through a traditional lending institution or to qualify for additional credit. The average credit score in the US is 714, according to Experian.

For those Americans, high-interest payday loans are still easily accessible. These small-dollar amount loans, typically between $100 and $1,000, are available in more than half of all US states with little regulation. Proof of income and a bank account is all most borrowers need to walk out with cash in hand.

Current data that tracks the number of payday loans has yet to be released, but based on past trends there is likely an increase in borrowing, said Alex Horowitz, principal officer for Pew's consumer finance project. "Our survey data shows that about 70% of payday loan borrowers use the loan primarily for routine expenses and to cope with increased or volatile expenses."

The debt trap

These loans are often incredibly expensive but borrowers either lack the financial literacy to seek out alternatives or don't think they have any other option. There is currently no federal cap on maximum interest rates for small-dollar loans. Not all states allow them, and it is up to that states that do to decide whether they'll implement their own caps.

In the 32 US states that allow payday lending, average annual interest rates range from 200% in Minnesota to 664% in Texas.

Borrowers often can't pay the full amount of the loan back when it comes due, typically in two to four weeks, leading them to take out a second loan with additional fees. That creates a cycle of debt that is hard to break. Nearly 1 in 4 payday loan recipients take additional loans nine times or more, the Consumer Financial Protection Bureau found.

Studies show that Black and Latino communities are disproportionately targeted by providers of high-cost loans. In Michigan, where the average payday loan interest rate is 370%, there are 7.6 payday stores for every 100,000 people in areas where the population is more than a quarter Black and Latino. That's about 50% more than other areas, according to data provided by the Center for Responsible Lending.

Companies that offer high cost loans say they provide a needed service to low income communities by issuing loans to Americans that traditional banks refuse to serve. They claim the high interest

rates are necessary because of the high risk of default. But consumer advocates say this is a false narrative.

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Seven large US banks, including Bank of America, Wells Fargo and Truist, have created [illegible] that offer small-dollar borrowing options with low annual interest rates, Horowitz said. They plan to look at banking history — not credit scores — to determine who qualifies for loans.

"There are 18 states and the District of Columbia that have banned payday loans and have survived just fine without these predatory lending products," said Nadine Chabrier, senior policy counsel at the Center for Responsible Lending. "There are fair and responsible lending products that have low interest rates and fees that are available and that people can use."

Shortly after the Covid-19 pandemic hit the US, the Consumer Financial Protection Bureau repealed major parts of a 2017 rule that required lenders to evaluate consumers' ability to repay loans. The rule, they said, would have wiped out much of the money they make from borrowers who miss payments on their loans. By repealing portions of the rule, the CFPB said it would ensure "the continued availability of small-dollar lending products for consumers who demand them."

In a blog post, Former CFPB director Dave Ueijo expressed concern with the rule changes, saying that he has problems with "any lenders' business model that is dependent on consumers' inability to repay their loans."

Buy now pay later

Advocates also worry about new forms of lending that have emerged in recent years that are generally far less regulated than even payday lending.

Buy now, pay later (BNPL) companies saw their total market share grow between 200% and 350% during the past two years, according to the Center for Responsible Lending. Companies including Klarna and Zip have partnered with Chevron and Texaco to allow Americans to fill their tanks now and pay in installments over six weeks.

BNPL customers tend to be millennial and Gen Z-aged and two-thirds of applicants are subprime borrowers, according to research by Marshall Lux, a research fellow at the Harvard Kennedy School.

These companies don't brand themselves as lenders. BNPL is not credit but debit, with repayments taken automatically from customers' bank accounts and no interest or fees.

In California, 91% of consumer loans made in 2020 were BNPL loans, and 24% of financially vulnerable BNPL recipients report challenges making payments.

BNPL lenders are not required by law to determine a borrower's ability to repay loans. There are no regulations regarding the disclosure of fees for late payments, account reactivation or rejected payments.

"If people are using a credit product like this for their basic needs I'm concerned," Chabrier said.

A Klarna representative said in a statement to CNN that the majority of their users pay on time and that they make a new lending decision on each transaction. "Using Klarna is never guaranteed and we restrict the use of our services until missed payments are fulfilled to prevent debt a[illegible]."

But Chabrier worries that because BNPL customers are able to open multiple loans at once, they could lose track or have difficulty paying them all back.

"Many people use buy now and pay later to stack their purchases through multiple vendors," Chabrier said. "Because of the lack of underwriting and the consideration of whether or not they can pay for these items, it becomes really unaffordable for them."

Klarna caps late fees at 25% of the purchase amount, a far cry from the 400% interest rates payday lenders charge, but Chabrier sees this as a less severe symptom of a larger problem.

"They're continuing this process of extracting money from low-income people," she said. "If people have less buying power with their wages it will just get worse."

Back in Mississippi, which has the highest rate of poverty in the country, Jones has struggled to keep distressed callers out of the hands of loan sharks and into financial literacy programs sponsored by local banks. But it's difficult to work against so many payday lenders with huge advertizing budgets, she said. The state has the highest concentration of payday lenders per capita in the nation, mostly in low-income areas or in communities of color.

Payday lenders are so prevalent in Mississippi, Jones said, that they outnumber McDonald's restaurants by more than 5 to 1.

$235 billion in interest in 2023, thanks to the Fed

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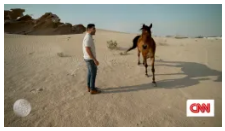

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Payday Lending in America: Who Borrows, Where They Borrow, and Why

REPORT

July 19, 2012

Read time: 3 min

Projects: Consumer Finance

QUICK SUMMARY

Each year, 12 million borrowers spend more than $7 billion on payday loans.

This report—the first in Pew's Payday Lending in America series—answers major questions about who borrowers are demographically; how people borrow; how much they spend; why they use payday loans; what other options they have; and whether state regulations reduce borrowing or simply drive borrowers online.

Key Findings

1. Who Uses Payday Loans?

Twelve million American adults use payday loans annually. On average, a borrower takes out eight loans of $375 each per year and spends $520 on interest.

Pew's survey found 5.5 percent of adults nationwide have used a payday loan in the past five years, with three-quarters of borrowers using storefront lenders and almost one-quarter borrowing online. State regulatory data show that borrowers take out eight payday loans a year, spending about $520 on interest with an average loan size of $375. Overall, 12 million Americans used a storefront or online payday loan in 2010, the most recent year for which substantial data are available.

Most payday loan borrowers are white, female, and are 25 to 44 years old. However, after controlling for other characteristics, there are five groups that have higher odds of having used a payday loan: those without a four-year college degree; home renters; African Americans; those earning below $40,000 annually; and those who are separated or divorced. It is notable that, while lower income is associated with a higher likelihood of payday loan usage, other factors can be more predictive of payday borrowing than income. For example, low-income homeowners are less prone to usage than higher-income renters: 8 percent of

renters earning $40,000 to $100,000 have used payday loans, compared with 6 percent of homeowners earning $15,000 up to $40,000.

2. Why Do Borrowers Use Payday Loans?

Most borrowers use payday loans to cover ordinary living expenses over the course of months, not unexpected emergencies over the course of weeks. The average borrower is indebted about five months of the year.

Payday loans are often characterized as short-term solutions for unexpected expenses, like a car repair or emergency medical need. However, an average borrower uses eight loans lasting 18 days each, and thus has a payday loan out for five months of the year. Moreover, survey respondents from across the demographic spectrum clearly indicate that they are using the loans to deal with regular, ongoing living expenses. The first time people took out a payday loan:

- 69 percent used it to cover a recurring expense, such as utilities, credit card bills, rent or mortgage payments, or food;
- 16 percent dealt with an unexpected expense, such as a car repair or emergency medical expense.

3. What Would Borrowers Do Without Payday Loans?

If faced with a cash shortfall and payday loans were unavailable, 81 percent of borrowers say they would cut back on expenses. Many also would delay paying some bills, rely on friends and family, or sell personal possessions.

When presented with a hypothetical situation in which payday loans were unavailable, storefront borrowers would utilize a variety of other options. Eighty-one percent of those who have used a storefront payday loan would cut back on expenses such as food and clothing. Majorities also would delay paying bills, borrow from family or friends, or sell or pawn possessions. The options selected the most often are those that do not involve a financial institution. Forty-four percent report they would take a loan from a bank or credit union, and even fewer would use a credit card (37 percent) or borrow from an employer (17 percent).

4. Does Payday Lending Regulation Affect Usage?

In states that enact strong legal protections, the result is a large net decrease in payday loan usage; borrowers are not driven to seek payday loans online or from other sources.

In states with the most stringent regulations, 2.9 percent of adults report payday loan usage in the past five years (including storefronts, online, or other sources). By comparison, overall payday loan usage is 6.3 percent in more moderately regulated states and 6.6 percent in states with the least regulation. Further, payday borrowing from online lenders and other sources varies only slightly among states that have payday lending stores and those that have none. In states where there are no stores, just five out of every 100 would-be borrowers choose to borrow payday loans online or from alternative sources such as employers or banks, while 95 choose not to use them.

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Predatory *Lending*

Unfair, deceptive, or abusive loan terms that can trap borrowers in a cycle of debt.

What is *Predatory Lending?*

Predatory lending is any lending practice that uses deceptive or unethical means to convince you to accept a loan under unfair terms or to accept a loan that you don't actually need. Predatory lenders often target minorities, the elderly, the less educated, and the poor.

Payday *Loans*

Payday loans are typically predatory in nature. Payday loans are short-term, high-interest loans, usually for small amounts ($500 or less), that are due your next pay day. Often, you are required to give the lender your bank account information or write a check for the full amount upfront, which the lender then cashes when the loan is due. These loans are often advertised as quick help for an unexpected emergency.

The Harms of *Payday Loans*

There are many downsides to taking a payday loan; below are several of the most problematic issues:

- **Payday loans are expensive.** Interest rates for payday loans are often extremely high. The cost of the loan (the finance charge) typically ranges from $10–$30 for every $100 borrowed, so a $500 loan would include an extra $50–$150. If you have difficulty repaying the loan when it is due, these fees can increase.
- **Payday loans can damage your credit.** Lenders usually require a check upfront to cover the cost of the loan, which they then cash when the loan is due. If you have trouble repaying the loan when it is due or if there is an issue with the loan money getting to you on time, that check may bounce and case you to default on the loan. When this happens, the lender could report your default to credit bureaus, which will damage your credit. The lender could also attempt to sue you, which could be recorded in your credit report and also cause damage.
- **Payday lenders can require you to give them your bank information.** Instead of requiring a check for the loan amount upfront, the lender may require your bank account information. If the time comes to pay the loan and your account does not have sufficient funds, the lender may try several times to withdraw the money, which can lead to overdraft charges from your bank.
- **Payday loans can lead to debt collection issues.** Many payday lenders are debt collection-minded. They might also sell your debt to an actual debt collector. If you are unable to pay the loan on time, you may be harassed with debt collection calls (https://www.consumeradvocates.org/for-consumers/debt-collection/).

Car Title *Loans*

Car title loans are also typically predatory. Like payday loans, car title loans are marketed as small emergency loans lent to you for a short time, but they also have extremely high annual interest rates. To get such a loan, you would need to give the lender the title of your vehicle. Typically, you would need to repay the loan within 30 days, along with borrowing fees (these can be high: sometimes 25% of the amount you borrow). If you cannot replay the loan, the lender can take your vehicle.

Alternatives to *Payday or Car Title Loans*

Before taking a risky and high-interest payday or car title loan, consider other options:

- Look into a loan from a bank, credit union, or small-loan company. These places usually have more reasonable interest rates.
- Ask to borrow the money from family or friends.
- Talk to a credit counselor (https://www.debt.org/credit/counseling/) for advice.

Debt *Collection*

If you were unable to pay a loan on time and are now dealing with debt collection calls, check out our debt collection (https://www.consumeradvocates.org/for-consumers/debt-collection/) and robocalls (https://www.consumeradvocates.org/for-consumers/robocalls-telemarketing/) pages for information on your rights in these situations.

Contacting *an Attorney*

Search our **Find An Attorney directory (https://www.consumeradvocates.org/findanattorney/)** to find a NACA attorney who can assist you with loan issues.

Find an Attorney
(https://www.consumeradvocates.org/findanattorney/)

Resources

If you are serving or have served in the military, there are special protections from predatory lending for you under the Military Lending Act (https://www.consumerfinance.gov/ask-cfpb/what-are-my-rights-under-the-military-lending-act-en-1783/). You can also find more information on our military consumers page (https://www.consumeradvocates.org/for-consumers/military-consumers/).

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NACA does not provide legal services or advice. The information on www.consumeradvocates.org is for informational purposes only and is not legal advice or a substitute for legal counsel. The information contained on www.consumeradvocates.org may or may not reflect the most current legal developments.

NACA provides links to attorneys, organizations, and governmental entities that promote justice for consumers and are involved in curbing abusive and predatory business practices. We do not intend such links to be referrals or endorsements of the linked entities.

Issue *Areas*

As an organization devoted to consumer justice, we are committed to educating consumers like you about their rights and helping them achieve justice for themselves and for their communities. Look around our website to learn about some of your basic rights, to find some help, and to join with us in our effort to build a fair and just consumer marketplace.

Arbitration (https://www.consumeradvocates.org/for-consumers/arbitration/) →

Auto Issues (https://www.consumeradvocates.org/for-consumers/auto-issues/) →

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Identity Theft (https://www.consumeradvocates.org/for-consumers/identity-theft/) →

Military Consumers (https://www.consumeradvocates.org/for-consumers/military-consumers/) →

Mortgage, Real Estate, & Housing (https://www.consumeradvocates.org/for-consumers/mortgage-real-estate-housing/) →

Predatory Lending (https://www.consumeradvocates.org/for-consumers/predatory-lending/) →

Robocalls & Telemarketing (https://www.consumeradvocates.org/for-consumers/robocalls-telemarketing/) →

Student Loans (https://www.consumeradvocates.org/for-consumers/student-loans/) →

Share Your *Story*

We realize that your experience has likely been very difficult and you may not want to retell your story, but by sharing your story you will be helping us drive national and local debates as well as discussions with policymakers. You have the ability to potentially make a difference so that other consumers don't have to endure what you've gone through.

Submit Your Story (https://www.consumeradvocates.org/for-consumers/share-your-story/)

Become a *Member*

Are you a lawyer committed to advancing the cause of just treatment for and ethical representation of consumers? Consider membership in NACA.

Start Here (/membership/become-a-member/)

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Quality of Housing

Neighborhood and Built Environment

About This Literature Summary

This summary of the literature on Quality of Housing as a social determinant of health is a narrowly defined examination that is not intended to be exhaustive and may not address all dimensions of the issue. Please note: The terminology used in each summary is consistent with the respective references. For additional information on cross-cutting topics, please see the Crime and Violence, Environmental Conditions, and Housing Instability literature summaries.

Related Objectives (4)

Here's a snapshot of the objectives related to topics covered in this literature summary. Browse all objectives.

- Increase the proportion of homes that have an entrance without steps — DH-04
- Reduce blood lead levels in children aged 1 to 5 years — EH-04
- Increase the proportion of people whose water systems have the recommended amount of fluoride — OH-11
- Increase the proportion of smoke-free homes — TU-18

Related Evidence-Based Resources (3)

Healthy People 2030 organizes the social determinants of health into 5 domains:

1. Economic Stability
2. Education Access and Quality
3. Health Care Access and Quality
4. Neighborhood and Built Environment
5. Social and Community Context

Literature Summary

There are several aspects to housing that impact health, including affordability, stability, quality and safety, and surrounding neighborhood.[1] This summary will discuss the quality of housing, specifically the physical quality of housing and neighborhood conditions. In this summary, “home” is used as an all-inclusive term to include all different types of dwellings, such as single-family homes and apartments. Housing quality refers to the physical conditions of a person’s home as well as the quality of the social and physical environment in which the home is located.[2,3] Poor-quality housing is associated with various negative health outcomes.[3–6]

Home design and structure significantly influence housing quality and may affect both mental and physical health.[7–9] Poor housing quality and inadequate conditions — such as the presence of lead, mold, or asbestos, poor air quality, and overcrowding — can contribute to negative health outcomes, including chronic disease and injury.[2–6] For example, lead exposure from paint, pipes, and faucets can lead to irreversible adverse health effects.[10–13] Even low levels of lead exposure can have serious effects on children’s health and behavior, including nervous system and cognitive development.[14,15] Lack of air conditioning and heating can affect residents’ health.[3,4,16] Cold indoor conditions have been associated with high blood pressure and respiratory conditions, as well as depression.[4,17] Additionally, water leaks are associated with mold growth, which has been shown to affect respiratory health and increase the likelihood of asthma, coughing, and wheezing.[18,19] Lack of smoke alarms, carbon monoxide detectors, and other fire suppression requirements can lead to injury

and death.[1] Lastly, residents of overcrowded homes may be at risk for poor mental health, food insecurity, and infectious diseases.[3,10,20,21]

Physical and structural housing conditions discussed above disproportionally impact children, older adults, individuals with physical disabilities, and low-income individuals.[10,22,23] Children's behaviors, such as hand-to-mouth activity, may increase their exposure to home pollutants that may influence growth and development.[10,22,24] Older adults may experience serious injury from falls in the home, especially in homes with stairs, narrow doorways, or other obstacles.[2,4,25] Steps, balconies, and windows are features of home design that may present a threat to safety, especially for individuals with physical disabilities.[2,3,26]

In addition, low-income families may be more likely to live in older homes and homes with greater risks that can impact health outcomes.[1] For example, these homes may be under-insulated, lack air conditioning, and cost more to heat, leaving homes too hot or too cold, which has been linked to poorer health outcomes.[3,4,16] Additionally, limited finances may result in a lack of housing maintenance, which can lead to poor housing conditions inside the home (e.g., damaged appliances, exposed nails, or peeling paint) as well as outside the home (e.g., damage to stairs and windows).[6]

The quality of a house's neighborhood is shaped in part by how well individual homes are maintained, and widespread residential deterioration in a neighborhood can negatively affect mental health.[6] In addition to housing quality, physical, social, and economic conditions within neighborhoods can also impact short- and long-term health outcomes.[27] These conditions may include crime and violence, environmental conditions, and access to public services such as public transportation, law enforcement, and schools. As a result, poor-quality housing in disadvantaged neighborhoods further exacerbates health disparities.[27]

Addressing the quality of housing as a public health issue may help prevent and reduce negative health outcomes. Housing codes and laws, such as banning the use of lead paint, have led to increased quality of housing.[3,10] Additionally, local building codes and state statutes require landlords to provide basic standards such as sufficient hot water, reliable heat, and smoke and carbon monoxide detectors.[28] Programs such as the federal government's Housing Choice Voucher program assist vulnerable populations in securing quality housing. Landlords are required to pass the program's housing quality standards to provide decent, safe, and sanitary housing.[29] Further research is needed to develop other effective interventions to improve housing quality. This additional evidence will facilitate public health efforts to address quality of housing as a social determinant of health.

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STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of **DTE GAS COMPANY** for authority to increase its rates, amend its rate schedules and rules governing the distribution and supply of natural gas, and for miscellaneous accounting authority.	Case No. U-21291 ALJ Jonathan F. Thoits

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PROOF OF SERVICE

I, Mark Templeton, certify that an electronic copy of the NON-CONFIDENTIAL Accompanying Exhibits FLO-210 to FLO-216 (Part 2 of 4) for the Direct Testimony of Sergio Cira-Reyes on Behalf of Frontline Organizations was served on the following on May 7, 2024.

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The statements above are true to the best of my knowledge, information, and belief.

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Date: May 7, 2024

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