

February 12, 2025

**To:** The Assembly Committees on Ways and Means, and Social Services,  
and the Senate Committees on Finance and Social Services

**From:** Ian Donaldson, Communications and Policy Manager and Laurie Wheelock, Executive  
Director and Counsel of the Public Utility Law Project of New York

**Re:** Written Testimony for the SFY-2026 New York State Environmental Conservation  
Budget Hearing

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Good afternoon, Members of the Joint Legislative Budget Hearing on Environmental Conservation. The Public Utility Law Project of New York (“PULP”) appreciates the opportunity to provide written testimony today.

## **I. INTRODUCTION**

For over forty years, PULP has acted as New York’s premier advocate and information resource for New York’s low- and fixed-income utility consumers. Our focus encompasses a range of utilities, including electric, gas, water, internet, cable, and phone services. Our commitment lies in educating and empowering these households, alongside robust consumer advocacy and legal intervention in utility-related issues.

PULP recognizes the urgent need for new and enhanced measures to help low-income New Yorkers achieve energy affordability. As budget negotiations progress, it’s imperative to consider the broader landscape of energy affordability in New York State, with a focus on equity and a just transition for low- and fixed-income households. The following discussion outlines PULP’s proposals for innovative strategies to advance these goals, followed by a review and analysis of key budgetary elements in the Governor’s proposed budget that impact energy affordability.

## **II. DISCUSSION OF PULP BUDGET PROPOSALS**

### **A. BACKGROUND ON NEW YORK STATE’S ENERGY AFFORDABILITY CRISIS**

#### *1) The Amount Owed by Residential Households Behind on Their Electric and Gas Bills Remains Far Above Pre-Pandemic Levels*

On a monthly basis, each of New York’s electric and natural gas investor-owned utilities files a report with the Department of Public Service (“DPS”) that details how many residential customers are at risk of a service termination and how much they collectively owe in electric and natural gas arrears.<sup>1</sup> As of December 2024, over 1.3 million households are behind on their energy bills by 60 days-or-more, collectively owing more than \$1.8 billion.<sup>2</sup> This represents a significant increase from December 2019, when approximately 929,000 customers owed \$742 million. Despite the implementation of Phase I and Phase II Utility Debt Relief Programs, utility arrears have grown by 33% since the application of Phase II relief and are rapidly approaching

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<sup>1</sup> *See*, Case 91-M-0744, which contains energy utility monthly collections reports (AKA “CARS” reports).

<sup>2</sup> *Id.*

pre-relief levels. PULP has prepared the attached Addendum, which includes charts demonstrating the growth of statewide energy debt over time. Chart 1 demonstrates how customers of individual utilities are currently faring, and Chart 2 shows how residential customers were doing since the onset of the COVID-19 pandemic.

PULP is deeply concerned by the unprecedented rise in electric and gas arrears following the application of two phases of utility debt relief. This alarming increase in arrears coincides with the unexpected early closure of the Regular Home Energy Assistance Program (“HEAP”) grant on January 21, 2025. This federally funded program, which provides vital assistance to low-income households for heating costs, is a crucial lifeline during the cold winter months. Its early closure is particularly concerning and raises the risk of further increases in utility debt. PULP thanks the Governor, OTDA, and DOB, who provided \$35 million in additional funding on January 24, 2025, to re-open Regular HEAP. PULP finds this high-risk incident to be an important reminder of the need to assist, enhance, and support low-income households. PULP urges the state to take creative and proactive measures to support low- and fixed-income households, strengthen protections, and address the growing energy affordability crisis.

*2) An Overview of Recent Delivery Rate Increase Requests, PSC Approvals, and Their Impact on Ratepayers*

The energy affordability crisis in New York is being compounded by a troubling trend of substantial rate increase requests submitted by utilities and the Public Service Commission’s (“PSC”) routine approval of significant increases. While many of the approved rate hikes are reduced from the utilities’ initial filings and spread over multiple years, they still place considerable financial strain on ratepayers. The PSC has authorized double-digit rate increases in several cases, with similar proposals currently under review for National Grid upstate, the new Central Hudson case, and Orange and Rockland. These rising costs are creating real and growing financial challenges for countless households, particularly for low- and fixed-income families who often rely on PULP for assistance. This trend underscores the urgent need for continued and enhanced legislative action to address New York’s energy affordability crisis.

**B. PULP’S ONGOING EFFORTS NECESSITATE ENHANCED LEGISLATIVE SUPPORT**

*1. A Review of PULP’s Efforts in 2024*

First and foremost, PULP would like to thank the Legislature for its continued support of our vital work. The \$2 million appropriated in last year’s Enacted Budget, an increase of \$600,000 from SFY-2024, will allow us to expand our capacity by hiring four to five new staff members. These funds, which PULP expects to be accessible through our contractor NYSERDA in March or April 2025, have enabled us to begin the hiring process and start to interview candidates to join our staff. PULP has identified the need for further staff to strengthen our direct services and rate case advocacy, as demand for our work continues to rise. We are currently looking to hire another Staff Attorney, a Utility Research Assistant, and an Executive Administrator to support our growing workload. We are deeply grateful for the Legislature’s recognition of our mission and the resources provided to meet the increasing needs of New York’s utility consumers.

In 2024, PULP’s small but dedicated team navigated an unprecedented workload heightened by the pandemic’s impact on rate case timelines. We engaged in eight cases,

including those referenced in the last section, and worked diligently to elevate the voices of the financially vulnerable and disadvantaged and avert harmful rate increases. Notably, PULP's participation in the Veolia and Liberty Water rate cases was instrumental in the creation of the state's inaugural low-income water bill discount programs within the Companies' service territories.<sup>3</sup>

In the midst of the escalating energy affordability crisis, our work extended far beyond rate cases to providing hands-on support and guidance to low- and fixed-income residential consumers. In 2024, calls and emails for assistance from our direct services staff grew by nearly 46% over the prior year. PULP also proudly partnered with numerous community-based organizations, Senators, and Assemblymembers to host twenty-five utility workshops, clinics, and trainings across the state. At these events, we collaborated with key stakeholders, including local Departments of Social Services, Department of Public Service ("DPS"), utilities, and the regional Clean Energy Hubs, to provide residents with practical assistance. Our team helped attendees navigate and apply for essential programs like the Energy Affordability Program ("EAP"), the Home Energy Assistance Program ("HEAP"), and EmPower+, among others. Especially critical during the high-bill winter months, these sessions not only aid in managing utility costs but also demonstrate PULP's dedication to hands-on support and building collaborative efforts for the betterment of our communities.

*2) PULP Respectfully Requests an Appropriation of \$2,250,000 Million in the SFY 2025 Budget*

As we examine the trend of escalating utility bills, PULP's work to advocate for fair and equitable utility services for all, especially the most vulnerable, is more vital than ever. However, our commitment to championing the rights of utility consumers in New York has reached a pivotal moment, necessitating increased legislative support. The growing volume of direct service cases, along with the critical role we play in rate case and policy proceedings, particularly for the Climate Leadership and Community Protection Act's ("CLCPA") implementation, demands a significant expansion of our team.

An appropriation increasing PULP's funding by **\$250,000** would allow our group to the hire at least two additional full-time staff members and potentially one part-time staff member to assist with intake, direct services, and rate case work. This amount would be used for salary, along with providing benefits, including health/vision/dental insurance and retirement, so that our organization can remain competitive with New York State's Agencies. With such funding, we can continue to deliver the level of service and advocacy the Legislature has come to expect of us and effectively address the evolving challenges in utility consumer advocacy.

It's important to note that PULP was one of the many stakeholders who would have benefited from your Intervenor Funding legislation, S.2477 (Parker)/A.836 (Solages), which passed both houses in 2022, 2023, and 2024, but was ultimately vetoed by the Governor all three times.<sup>4</sup> The Assembly and Senate can bolster its support for our essential work here by supporting a \$250,000 increase in our line item and including us in their One-House Budgets.

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<sup>3</sup> *See*, Joint Proposal and Appendices, Case 23-W-0111, at 41-42. Available at <https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={403BD68C-0000-C21D-81D1-B7E02A42D4D1}>.

<sup>4</sup> *See*, Veto No. 69 (2024), Veto No. 64 (2023) and Veto No. 161 (2022).

## C. THE IMPLEMENTATION OF DATA MATCHING NECESSITATES INCREASED SUPPORT FOR THE STATE’S ENERGY AFFORDABILITY PROGRAM (“EAP”)

### 1) *Background on New York State’s Energy Affordability Policy*

In May 2016, New York State took an important step towards energy affordability when it established a policy that no low-income utility consumer should spend more than 6% of their monthly household income on their energy bills.<sup>5</sup> In its Order, the PSC directed each regulated electric and natural gas company to develop a monthly bill discount for customers that have been identified as low-income. The discount is based on Census data and typical utility bills, not on an individual household’s financial circumstances. As a result, once a customer is enrolled in the EAP, they receive credits designed to ensure that the “average” household is not spending more than 6% on their monthly energy bill.

The EAP overall has proven incredibly beneficial to the households that are enrolled in their utility’s low-income discount program. For instance, National Grid NYC customers who heat with gas can receive anywhere from \$40 to \$89 off their monthly bills depending on their income tier.<sup>6</sup> However, PULP estimates that up to 1.1 million households statewide are eligible for, but do not receive, the benefit. Moreover, not every household currently enrolled in the EAP receives the correct benefit amount to lower their energy burden to 6%. PULP estimates that these enrollment discrepancies have led to a \$1.75 billion affordability gap that comprises all low-income households, whether or not they are enrolled in the EAP.<sup>7</sup>

### 2) *The EAP Works and Actually Saves All Ratepayers Money*

The EAP has proven to be highly effective in reducing utility arrears and helping to prevent low-income utility customers from being at risk for service termination. For example, during the pandemic period (from 2020 through June 2022), the overall arrears of low-income households enrolled in EAP rose at a much slower rate compared to those not enrolled. Specifically, arrears per EAP participant rose by 50%, whereas arrears per non-EAP residential customer increased by 89% during the pandemic period.<sup>8,9</sup>

PULP therefore estimates that, due to the program, residential ratepayers collectively avoided \$89 million in costs associated with providing arrears relief for low-income households.

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<sup>5</sup> *See*, Case 14-M-0565, Order Adopting Low Income Program Modifications and Directing Utility Filings, Proceeding on Motion of the Commission to Examine Programs to Address Energy Affordability for Low Income Utility Customers (May 20, 2016) at 8.

<sup>6</sup> National Grid NYC’s current EAP levels for heating customers, <https://www.nationalgridus.com/NY-Home/Bill-Help/Energy-Affordability-Program?regionkey=nymetro&customertype=home>; income tier is parallel to the HEAP tiers established by OTDA.

<sup>7</sup> *See*, 14-M-0565, June 2022 EAP Quarterly Reports; PULP’s estimates are a compilation of all the utility data for enrollment as of June 30, 2022, EAP Quarterly Reports and the U.S. Census Bureau’s 2021 American Community Survey.

<sup>8</sup> *See*: Utility Collections Activity Reports (CARs) filed with the New York State Public Service Commission, Case 91-M-0744. Available at:

<https://documents.dps.ny.gov/public/MatterManagement/CaseMaster.aspx?MatterSeq=1331&MNO=91-M-0744>.

<sup>9</sup> *See*: Quarterly/Monthly Utility Low-Income Reports filed by each utility with the Public Service Commission, Case 14-M-0565. Available at:

<https://documents.dps.ny.gov/public/MatterManagement/CaseMaster.aspx?MatterCaseNo=14-M-0565>.

In absence of EAP discounts, the arrears of participants would have likely increased at the same rate as non-participants, necessitating an additional \$380 million in arrears relief, or \$559 million when factoring in the carrying costs (interest) established under the Phase II arrears relief Order.<sup>10</sup>

Additionally, the cost of EAP to ratepayers is relatively modest. For the 2022-2023 program year, PULP estimates that the total funding for EAP was approximately \$243 million, equating to just \$20 per year for the average residential electric customer and \$21 per year for the average residential gas customer – less than \$2 per month for each service.<sup>11,12,13</sup> This analysis underscores how effective EAP is in delivering significant relief for its participants and also reducing the financial burden of arrears relief programs

### *3) EAP Enrollment Should Increase Statewide in 2025 Thanks to the Implementation of Utility Data Matching*

PULP would like to thank the Legislature once again for its support of utility data matching, which passed both houses and was signed into law by the Governor in December 2023.<sup>14</sup> This law, which will replicate a process already used by the NYC Human Resources Administration (“HRA”), directs the State Office of Temporary and Disability Assistance (“OTDA”) to identify eligible households and “data match” with the utilities to automatically enroll low-income customers in the EAP, without the need for them to submit a burdensome application and prove enrollment eligibility. Once implemented in 2025, this program will represent a significant advancement in our shared goal of ensuring equitable access to essential utility services for low- and fixed-income New Yorkers. PULP believes that the State’s utility data match program will be successful and as a result, the State should prepare for the enrollment of new customers into their electric and gas utility companies’ low-income programs by the start of 2025.

Currently, the EAP is implemented by the Commission Order Adopting Energy Affordability Policy Modifications and Directing Utility Filings (issued and effective August 12, 2021) in Case 14-M-0565 (the “Order”).<sup>15</sup> To date, the program has been funded entirely by ratepayers. Essentially, each utility sets an annual budget for the program that is no more than 2% of its revenues. The utilities then use the Commission’s ordered formula to calculate the EAP credits that will be offered for the year based on the type of service the customer receives, and their Tier Level.<sup>16</sup> As we understand the program, once a utility has hit their 2% budget cap,

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<sup>10</sup> Supra, 8 – 12, at 5.

<sup>11</sup> See: Annual EAP Reports filed by each utility for the 2022-2023 program year, Case 14-M-0565. Available at: <https://documents.dps.ny.gov/public/MatterManagement/CaseMaster.aspx?MatterCaseNo=14-M-0565>.

<sup>12</sup> See: PULP Proposal - \$200 Million State Budget Appropriation, Cases 14-M-0565, 23-M-0298 (Appendix A). Available at: <https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={D08D848A-0000-CC37-9C81-43E6B6A88193}>.

<sup>13</sup> See: PULP Proposal - \$200 Million State Budget Appropriation, Cases 14-M-0565, 23-M-0298 (Appendix B). Available at: <https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={D08D848A-0000-C454-8B4E-2F53AC78993E}>.

<sup>14</sup> See, Chapter 764 of the Laws of 2023.

<sup>15</sup> See, generally, Case 14-M-0565, Order Adopting Low Income Program Modifications and Directing Utility Filings, Proceeding on Motion of the Commission to Examine Programs to Address Energy Affordability for Low Income Utility Customers (May 20, 2016)

<sup>16</sup> Most of the investor-owned utilities have 4 EAP Tiers which are based on factors determining HEAP grant levels.

there is no more room to continue to add people to the program without lowering the monthly credit amount, to ensure the proper allocation of the maximum budget allowed under the cap.

It is also PULP's understanding, based on meetings with the EAP Working Group, that many if not most of the investor-owned electric and gas utilities are at or near their 2% budget caps. For the purpose of gauging how many households might be auto-enrolled into EAP come 2025, PULP monitors OTDA's monthly "Temporary and Disability Assistance Statistics" reports, which are filed on OTDA's website.<sup>17</sup> As of October 2024, there were 694,972 recipients of Temporary Assistance in New York State.<sup>18</sup> While some of the recipients of Temporary Assistance may already be enrolled in their utility company's EAP, PULP is unaware of any database that exists that would allow us to further deduce the eligibility pool. As such, we encourage the State to use this figure as it determines how many households could become eligible for EAP when automatic data matching occurs in early 2025.

PULP is concerned that the influx of new low- and fixed-income customers without a plan to support their enrollment will ultimately result in a decrease in the EAP credits for all enrolled customers. This situation could prove detrimental as it would diminish the financial relief long-standing beneficiaries have come to rely on, while also disheartening newly enrolled customers who may receive less than the anticipated full benefit.

4) *PULP Respectfully Requests the Legislature Appropriate \$200,000,000 to the Energy Affordability Program*

PULP believes that the most effective strategy to safeguard the existing EAP is to provide a dedicated line item through the NYS budget. Specifically, we advocate for an allocation of \$200,000,000 to ensure the program's stability as data matching introduces new enrollees in early 2025. We maintain this proactive measure is crucial to mitigate any potential benefit reductions and uphold the EAP's integrity and effectiveness when the influx of new participants begin to be added to the program. In doing so, the State can preserve the program's current effectiveness but also guarantee that enhanced enrollment efforts do not compromise the quality of assistance.

a. *A Note on the Expansion of the EAP Program to Moderate-Income Households ("Expanded EAP")*

The SFY-2024 Enacted Budget created an expanded EAP benefit to include residential electric and gas customers with household incomes below the state median, and PULP supported this program aimed at assisting moderate-income customers.<sup>19</sup> Moreover, the SFY-2024 Enacted Budget also included an additional one-time appropriation of \$200 million for "prompt assistance to utility customers related to the costs of utility affordability programs...."<sup>20</sup> As a member of the EAP Working Group, PULP is aware that there were several meetings over the Summer and Fall of 2023 focused on how Expanded EAP could be established and implemented. Unfortunately, as of the date of this submission, there is no official whitepaper or a DPS Staff Proposal for the Expanded EAP benefit.

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<sup>17</sup> *See*, OTDA's Temporary and Disability Monthly Statistics, available at: <https://otda.ny.gov/resources/caseload/>

<sup>18</sup> *Id.* at October 2024 Report, Table 2 at 6, available at: <https://otda.ny.gov/resources/caseload/2024/2024-10-stats.pdf>

<sup>19</sup> *See*, PULP Testimony Before the Joint Legislative Budget Committee on Environmental Conservation, February 14, 2023, at 5.

<sup>20</sup> *See*, Chapter 53 of the Laws of 2023, at 1189.

If a proposal for Expanded EAP is released concurrent to budget negotiations, PULP would advocate for a clear funding mechanism for the upcoming year to safeguard against any potential financial shortfalls. We recommend a funding level of \$100,000,000 as a base for starting such a program.

Further, to enhance transparency and accountability, we ask that there be an annual reporting requirement from the Department of Public Service. We believe this report could serve as an important tool for the Legislature to monitor the program’s implementation progress and its eventual progress. Such a requirement would ensure ongoing, data-driven reviews and facilitate continuous improvement and adaptation to meet the evolving needs of New York’s residents.

#### **D. THE STATE SHOULD BE PREPARED TO FULLY FUND THE EXISTING HEAP PROGRAM FOR THE 2025-2026 WINTER SEASON**

The Home Energy Assistance Program (“HEAP”) is a federally funded program that assists eligible low-income households with their heating costs, energy crisis assistance, and some energy-related equipment repairs. On January 21, 2025, the Regular HEAP program abruptly closed,<sup>21</sup> months earlier than prior years when it remained open through March or sometimes even May. It is our understanding that program funds ran dry earlier than expected due to an overwhelming number of applications for heating assistance this season. PULP is grateful to the Governor, OTDA, and DOB who allocated \$35 million to re-open the program.<sup>22</sup>

However, this situation underscores the urgent need for proactive planning for next year’s heating season (Nov. 2025 through April 2026). Given the uncertainty of federal funding under the new administration, and continuously increasing energy costs as noted above, PULP urges great caution and preparation for the worst-case scenario. We respectfully request \$400,000,000 be allocated to the fund HEAP in FY-2026.<sup>23</sup> This will help the state continue this essential program should New York State not receive sufficient federal funding for next year’s heating season. In a cold weather state like ours, it is too critical to leave vulnerable households at risk during the dangerously cold winter months our state is accustomed to.

#### **E. THE STATE SHOULD ESTABLISH CASH ASSISTANCE FOR COOLING TO HELP PAY HIGH SUMMER ELECTRIC BILL**

PULP advocates for a \$150 million appropriation to establish a Cooling Cash Assistance program to provide direct financial support to low-income New Yorkers struggling with high summer electricity bills. While the current HEAP Cooling program offers air conditioners or fans to eligible households, it does not address the financial burden of increased electric usage during summer months.<sup>24</sup> As a result, many low-income households avoid using cooling devices altogether due to fear of unaffordable bills. This leaves vulnerable populations – such as the

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<sup>21</sup> “NY spends \$35 million to reopen HEAP applications after federal funding runs out.” by Dan Clark, available at <https://www.timesunion.com/capitol/article/new-york-fund-energy-assistance-program-federal-20054359.php>

<sup>22</sup> *Id.*

<sup>23</sup> “Governor Hochul Announces Home Heating and Energy Efficiency Assistance to Help New Yorkers Lower Heating Costs this Winter.” Press release available at: <https://hcr.ny.gov/news/governor-hochul-announces-home-heating-and-energy-efficiency-assistance-help-new-yorkers-lower#:~:text=Governor%20Kathy%20Hochul%20today%20announced,of%20families%20across%20the%20state.>

<sup>24</sup> *See*, HEAP cooling, available at: <https://otda.ny.gov/programs/heap/>

elderly, individuals with medical conditions exacerbated by heat, and families with young children – at significant health risk from heat-related illnesses, including dehydration, heat exhaustion, and heat stroke.

PULP envisions the program could function as a seasonal cash grant, like HEAP’s winter heating benefit, where eligible households receive a one-time payment or direct credit toward their utility account to help cover summer electricity costs. PULP believes the program could leverage existing infrastructure to be implemented quickly and efficiently. Eligibility could align with existing criteria for HEAP to ensure assistance reaches those most in need. Such a program would help residents, and their families stay cool, safe, and healthy in their homes during the hottest and most humid summer months. It would also likely help prevent the accrual of arrears, similar to the regular HEAP benefit.

### **III. DISCUSSION OF PROPOSALS IN THE GOVERNOR’S EXECUTIVE BUDGET**

#### **A. ENERGY AFFORDABILITY PROGRAMS SHOULD BE FUNDED AS PART OF THE GOVERNOR’S PROPOSED \$1 BILLION “SUSTAINABLE FUTURE PROGRAM”**

The Governor’s Executive Budget includes a \$1 billion appropriation for a “Sustainable Future Program” to make investments in the state’s clean energy future.<sup>25</sup> PULP is generally supportive of this but maintains that to ensure a just and equitable energy transition, energy affordability must be a core component of this investment – particularly for DACs and low-income households. The Climate Justice Working Group’s Final and Approved Plan underscores the importance of reducing energy burdens through targeted benefits.<sup>26</sup>

Dedicated state funding for existing programs, such as EAP, and the expansion of energy efficiency initiatives, such as Empower Plus, will directly lower energy costs for vulnerable consumers while advancing the state’s broader climate and affordability goals. With rising utility arrears and the early closure of regular HEAP, PULP urges New York to act now. Dedicating a portion of the Sustainable Future Program to energy affordability could provide immediate relief for households struggling with high energy burdens now and foster longer-term financial stability for financially vulnerable New Yorkers.

#### **B. DATA MATCHING FOR WIC AND SNAP**

The Governor’s State of the State briefing book includes a proposal to help families afford their grocery bills and support better health and life outcomes for young children.”<sup>27</sup> The measure would bring OTDA and the Department of Health together to conduct data matching so that households can be considered for dual eligibility and enrollment in both programs. Unfortunately, PULP was unable to locate these initiatives in any of the Article VII or appropriation bills.

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<sup>25</sup> *See*, Capital Projects Budget Bill, A3004/S3004, at Page 1022.

<sup>26</sup> Scoping Plan, Full Report, at 7, available at: <https://climate.ny.gov/resources/scoping-plan/>

<sup>27</sup> *See*, 2025 Governor Hochul’s State of the State book, at 90, available at: <https://www.governor.ny.gov/sites/default/files/2025-01/2025StateoftheStateBook.pdf>.



PULP generally supports this measure and recommends the inclusion of Article VII language to formally establish the program, as past data matching initiatives have required codification.<sup>28</sup> Additionally, we urge the Governor and Legislature to explore broader opportunities to use data matching to connect low-income families of all ages with critical benefits.

#### **IV. CONCLUSION**

PULP appreciates the opportunity to provide written testimony at today's Joint Budget Hearing on Human Services. We thank Governor Hochul for raising energy affordability in the Executive Budget and encourage the Legislature to consider the recommendations and questions PULP has raised in our testimony. Thank you.

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<sup>28</sup> See, Chapter 764 of 2023, Chapter 564 of 2024, and Chapter 633 of 2024.

## Addendum

**CHART #1: RESIDENTIAL ARREARS BY UTILITY (DEC 2024)**

Company	Accounts in 60+ arrears	\$\$\$ Amount Owed
CHGE	55,171	\$133,896,359
Con Edison	496,007	\$948,402,457
KEDLI (Grid LI)	47,460	\$37,009,090
KEDNY (Grid NYC)	195,364	\$166,244,699
National Fuel Gas	50,471	\$22,292,188
NYSEG	101,805	\$65,288,468
NiMo (Grid Upstate)	234,694	\$309,028,055
O&R	19,574	\$21,423,027
PSEG-LI*	115,650	\$77,009,408
RG&E	67,284	\$76,938,256
<b>TOTAL ALL</b>	<b>1,383,480</b>	<b>\$1,857,532,007</b>

**CHART #2: AVERAGE RESIDENTIAL ARREARS BY UTILITY (DEC 2019)**

Utility	Average Residential Arrears By Utility - 2019								
	EAP			Non-EAP			Total		
	Customers	Amount	Per Customer	Customers	Amount	Per Customer	Customers	Amount	Per Customer
Con Edison	129,687	\$108,787,829	\$839	165,022	\$205,129,054	\$1,243	294,709	\$313,916,884	\$1,065
Central Hudson	5,223	\$4,143,201	\$793	16,755	\$4,998,757	\$298	21,978	\$9,141,958	\$416
KEDLI	4,832	\$2,725,025	\$564	38,832	\$21,217,194	\$546	43,664	\$23,942,220	\$548
KEDNY	46,654	\$19,320,986	\$414	104,258	\$50,778,816	\$487	150,912	\$70,099,802	\$465
NFG	13,011	\$7,203,077	\$554	29,518	\$14,446,056	\$489	42,530	\$21,649,133	\$509
NIMO	64,512	\$80,428,886	\$1,247	135,903	\$123,305,417	\$907	200,415	\$203,734,302	\$1,017
NYSEG	26,248	\$19,029,127	\$725	69,794	\$24,555,828	\$352	96,042	\$43,584,955	\$454
ORU	3,989	\$3,093,476	\$776	14,149	\$9,364,869	\$662	18,138	\$12,458,345	\$687
RG&E	22,235	\$27,882,480	\$1,254	39,369	\$20,965,297	\$533	61,604	\$48,847,777	\$793
<b>Total</b>	<b>316,390</b>	<b>\$272,614,088</b>	<b>\$862</b>	<b>613,600</b>	<b>\$474,761,288</b>	<b>\$774</b>	<b>929,990</b>	<b>\$747,375,376</b>	<b>\$804</b>