

When the Tap Runs Dry: Drinking Water Disconnections in Kentucky

Authors: Rebecca Shelton & Mary Cromer



Photo Credit: Jill Fraley

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Authors

Rebecca Shelton, Director of Policy, Appalachian Citizens' Law Center

Rebecca joined ACLC's staff in July 2019. At ACLC she analyzes and advocates for policy to promote a more just and equitable future in Central Appalachia. Current issues of focus include mine land reclamation, mine worker safety and health, climate and flood resilience, and utility affordability. She has a PhD in Sustainability Science from Arizona State University. Her dissertation and research expertise are focused on understanding the politics of justice in energy transitions. Rebecca also has a M.S. in plant and soil science from the University of Kentucky College of Agriculture, Food, and the Environment and a B.S. in Earth and Environmental Science from Furman University.

Mary Cromer, Deputy Director, Appalachian Citizens' Law Center

Mary leads ACLC's environmental justice program and represents individual clients and community organizations dealing with environmental injustices throughout Eastern Kentucky. Mary currently represents Martin County Concerned Citizens in their efforts to get safe, reliable, affordable water for all Martin County Water District customers.

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Introduction

Across the U.S., drinking water costs are rising, making it more and more difficult for families to remain connected to service. Between 2019 - 2024, combined water and sewer bills increased by 24.1 percent.¹ The 2024 EPA Water Affordability Needs Assessment estimated that between 12.1 and 19.2 million households in the U.S. lack access to affordable water services.² These challenges are reflected in the state of Kentucky. A 2023 study of drinking water affordability in Kentucky conducted by Appalachian Citizens' Law Center found that water is unaffordable at the median household income level in over fifty of the state's census tracts.³ At lower income levels, the problem is much more severe, for households in the lowest income quintile water was unaffordable in over 70 percent of the state's census tracts.

In the worst case scenarios, unaffordable water bills result in disconnection which has both household and community level impacts. Inconsistent access to water increases psychological distress among household members⁴ and is also a public health problem. Without water, it is impossible to flush toilets, wash hands, and bathe. During the COVID-19 pandemic, researchers found that states with water shutoff moratoria had a significantly lower number of COVID-19 infections.⁵ Though Kentucky instated a temporary shutoff moratorium during the pandemic, typical protections provided through regulation are weak.

In this report, we seek to better understand the extent to which water unaffordability is resulting in disconnections in Kentucky at water systems regulated by the Public Service Commission (PSC). Our study includes only these regulated water systems due to data limitations. There are 375 community water systems in Kentucky,⁶ but not all of them are regulated by Kentucky's Public Service Commission (PSC).⁷ The PSC regulates Kentucky's five investor-owned water utilities, as well as Kentucky's public water districts and water associations. For those PSC-regulated water utilities, the PSC's laws and regulations provide that the customers have the right to dispute a disconnection notice, the right to negotiate a partial payment plan and remain connected to service, and the right to a 30-day payment extension if a medical certificate issued by a health official is presented. The PSC's regulations also require that regulated water utilities provide annual reports of the number of accounts terminated for nonpayment. Importantly, those regulations do not cover the 197 municipal water systems in Kentucky. Common law protects customers of those municipal systems from disconnection without notice and an opportunity to dispute the reason for disconnection. But, there is no specific right to an extension if a medical certificate is presented and no right to enter a payment plan. Additionally, municipal water systems are not required to track and report their disconnections for nonpayment.⁸

We conducted our analysis by examining drinking water disconnections in Kentucky in Fiscal Year 2023 (FY23) and FY24 based on the annual reports submitted by drinking water utilities regulated by the PSC. Specifically, we analyzed data from the 114 drinking water utilities that submitted the required reports for both FY23 and FY24. Using that data, we examine annual disconnections, disconnection rates, the seasonality of disconnections, water burden, arrears, and the proportional impact of reconnect and disconnect fees on customer arrears.

¹Bluefield Research. (2025). U.S. Municipal Utility Water Rates Index 2024: Drinking Water & Sewer. Available at: <https://www.bluefieldresearch.com/ns/u-s-water-and-sewer-bill-has-increased-24-in-five-years-raising-affordability-concerns/>

²Environmental Protection Agency. (2024). Water Affordability Needs Assessment: Report to Congress. Available at: <https://www.epa.gov/system/files/documents/2024-12/water-affordability-needs-assessment.pdf>

³Shelton et al. (2023). Drinking Water Affordability in Kentucky. Available at: <https://aclc.org/wp-content/uploads/2024/02/Drinking-Water-Affordability-in-Kentucky-1.pdf>

⁴Gaber, Nadia et al. (2020). Water insecurity and psychosocial distress: case study of the Detroit water shutoffs. Journal of Public Health. at 1.

⁵Zhang, X., & Warner, M. E. (2021). The relationship between water shutoffs and COVID infections and deaths: Issue brief. Food & Water Watch & Cornell University. Available at: https://www.foodandwaterwatch.org/wp-content/uploads/2021/03/IB_2103_CornellWaterCOVID-WEB.pdf

⁶<https://eec.ky.gov/Environmental-Protection/Water/Drinking/Pages/Drinking%20Water.aspx>.

⁷The municipal water utilities in Kentucky do not fall under the PSC's jurisdiction. KRS 278.010(3).

⁸807 KAR 5:006 Sec. 4(5). The PSC provides forms for the utilities to ensure consistency in reporting. See, https://psc.ky.gov/Home/UtilForms_Disconnect.

We found 57,000 drinking water disconnections occurred in FY24 across 114 utilities, with monthly disconnection rates ranging from 0.05% to 3.4%. Additionally, disconnections increased from FY23 to FY24. In both years, the months of peak disconnection appear to mirror peaks in electricity disconnections. We find a slight positive relationship between water burden and monthly disconnection rate: as water burden increases, monthly disconnection rate also increases. However, we also observed that high and low disconnection rates did not consistently correspond with high and low water burdens, suggesting that there could be differences in the way utilities handle nonpayment that are effectively mitigating or exacerbating disconnection rates. Yet, a review of tariffs revealed little about effective utility-level policies. More research is needed on this subject.

We also reveal practices and policies that appear unreasonably punitive to households struggling to pay their water bills. First, we found that nearly 60% of water systems report disconnecting customers for arrearage amounts less than \$50. Second, we show that most systems add charges in the form of late fees and fees for the disconnection and reconnection of service that likely compound affordability problems. In some instances, these fees more than double the amount the customer must pay to restore service.

Last, our study demonstrates that the amount of funding required to prevent the hardship of disconnection is not impossibly high. Between \$7 to \$8.5 million in customer assistance funding is needed to prevent disconnections from service for the 114 water systems included in our study. Customer assistance funding would not only help keep households connected to water service, but also prevent the accumulation of additional customer charges through late fees, disconnect fees, and reconnect fees.

Based on our findings, we develop a number of recommendations. First, we include recommendations to ensure parity in customer protections and reporting requirements between PSC regulated systems and municipal systems that are not PSC regulated. We also recommend more robust reporting from all systems. Further, we recommend customer assistance at both the state and federal levels to provide necessary funding to reduce the high number of disconnections for nonpayment in Kentucky. However, we recognize that customer assistance is just a band-aid. To advance lasting solutions aimed at ensuring affordability at the household level, we recommend that the PSC be given express statutory authority to establish equitable rate designs and arrearage management programs, and we recommend that utilities have access to data needed to identify their low-income customers so that they can design affordable rates and target savings and assistance measures. Because disconnect, reconnect, and late fees add so much to the arrearage and compound affordability concerns, we recommend that the PSC investigate the use of disconnect and reconnect fees to ensure that they are kept to a minimum and prohibited for low-income customers. We also recommend that late fees be disallowed, especially for low-income customers. Finally, we recommend that a \$100 minimum arrearage be required for disconnection and that customers not be disconnected during days/times when they are unlikely to be able to reconnect for extended periods (such as over weekends and holidays).

Methods

Water utilities that are regulated by the PSC report residential disconnections due to non-payment to the PSC annually, as required by Kentucky regulation 807 KAR 5:006. These utility-specific reports contain the number of customer accounts disconnected each month, the number of customer accounts reconnected each month, and the highest, lowest, median, and average level of arrears at disconnection each month.⁹ We use these reports to analyze disconnections and arrears.

The PSC regulates 136 water systems but we analyzed disconnections for only 114 of these systems. The remaining systems did not have disconnection reports available for both FY23 and FY24 and thus we excluded them from our analysis. These 114 water systems collectively serve approximately 678,482 residential

⁹The reports do not distinguish among households. Those reconnected are not necessarily the same that were disconnected in a particular month. Some households may be disconnected multiple times a year but would be counted each time as a distinct household in these reports.

customers, which is around 15 percent of Kentucky’s population, and represent 30 percent of all the community water systems in the state (Table 1). A limitation on our study, however, is that small, Class 1 water systems serving 1500 or fewer customers are underrepresented (Table 1).

Table 1: All community water systems in Kentucky according to class size compared to the class size of community water systems in this study.

Class Size	Population served	Number of community water systems in Kentucky	Percent of all community water systems in Kentucky	Number of community water systems in our analysis	Percent of community water systems in our analysis
Class I	1,500 or less	79	21%	5	4%
Class II	1,500 - 15,000	226	60%	78	68%
Class III	15,000 - 50,000	59	16%	27	24%
Class IV	Greater than 50,000	10	3%	4	4%

In addition to data on disconnections we also examine the water affordability burden for customers served by these water systems. We calculate water burden at median household income for 4,000 gallons of monthly usage.¹⁰ Water rate and bill data was gathered from tariffs that are made publicly available on the PSC website. Median household income of water utility service territories was gathered from the Kentucky Water Resource Information System. Additional information about water system policies, including information about disconnect/reconnect fees, late fees, disconnection notice processes, payment plan options, and disconnect notice options was gathered from tariffs and websites for select utilities.

Results

Disconnections

There were 56,715 instances of disconnection from water service in FY24, a 3.3 percent increase from FY23 (Fig. 1). The majority of water systems in the study had average monthly disconnection rates less than 1 percent and the average disconnection rate was 0.77 percent (Fig. 2). However, there were two water systems with disconnection rates greater than 3 percent each month (Fig. 2).

¹⁰This usage level was selected because the Kentucky Public Service Commission considers 4,000 gallons of water as a typical usage level for residential customers

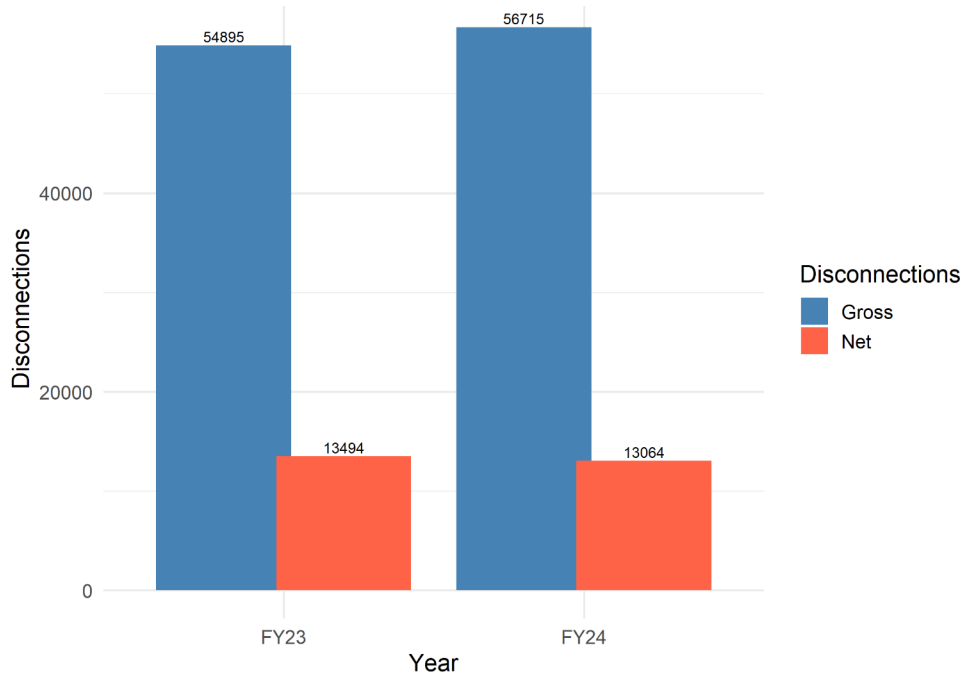


Figure 1: Instances of disconnection from water service during years FY23 and FY24. Gross disconnections are total disconnections reported and net disconnections account for the reported monthly reconnections.

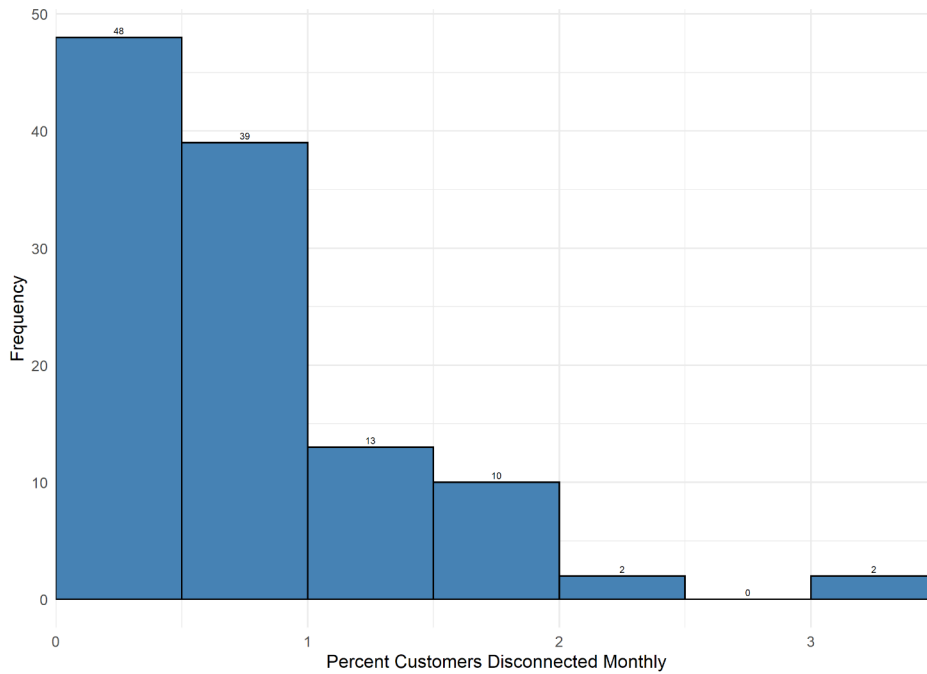


Figure 2: Distribution of water systems according to their average FY24 monthly disconnection rates. Frequency indicates the number of water systems that fall into each percentage category.

Disconnections occur throughout the year, peaking in September and March while falling drastically in December (Fig. 3). These trends for water disconnections are somewhat unintuitive as household water demand would not be expected to fluctuate in these ways. Rather, it seems more likely that water disconnection trends mirror the unaffordability of energy bills during these times as the seasonality of disconnections is interestingly similar to electricity disconnections in Kentucky (Fig. 4).



Figure 3: Drinking water service disconnections by month

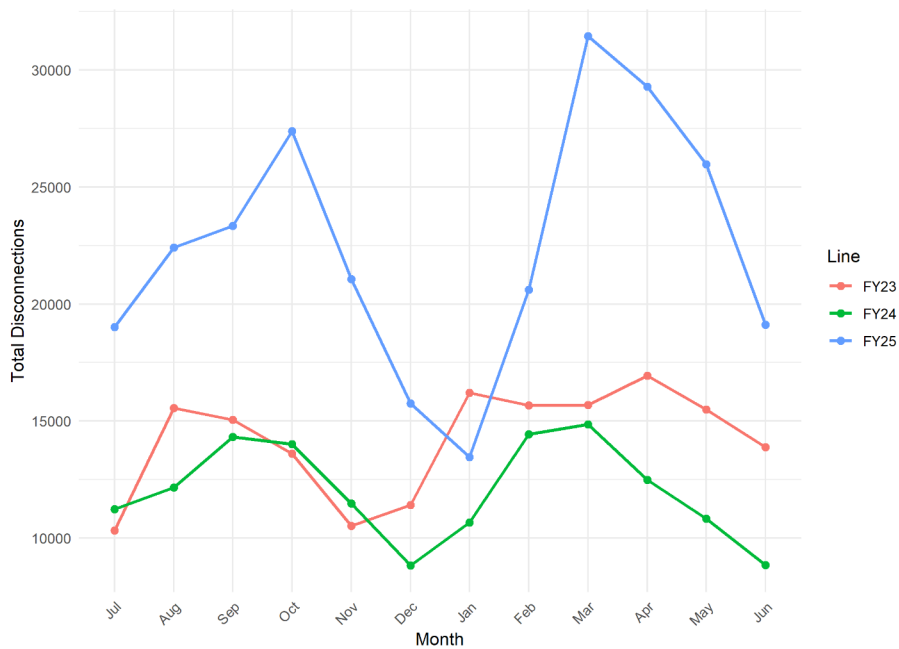


Figure 4: Electricity disconnections by month. (Reprinted from Lights Out in Kentucky: Energy Burdens and Electricity Disconnections Across the State, by Rebecca Shelton, Rahul Agrawal Bejerano, and Shelby Green, 2025. Reprinted with permission.)

Disconnections and Water Burden

We expected that the number of disconnections in a given water system would correspond to water burden, the percentage of income that a household spends on water each year. We do find a slight positive relationship between these two variables. As water burden increases, monthly disconnection rate also increases (Fig. 5). This finding suggests that making water more affordable, addressing high water bills and burdens, could potentially help minimize water disconnections. However, there are also several water systems with high disconnection rates that have surprisingly low water burdens (Table 2) and, vice versa, systems that have high water burdens and surprisingly low disconnection rates (Table 3). Jessamine Water District #1, Laurel County Water District #2, and Hardin County Water District no. 1 all rank among the top ten for disconnection but rank much lower in terms of water burdens. Rattlesnake Ridge Water District, Cumberland County Water District, and East Casey County Water District all rank among the top ten water systems for highest water burden but have relatively low disconnection rates. To better understand what may be contributing to these surprising results, we reviewed the tariffs and disconnection policies of these water systems. However, we found fairly uniform policies around disconnections, largely mirroring minimum requirements.¹¹

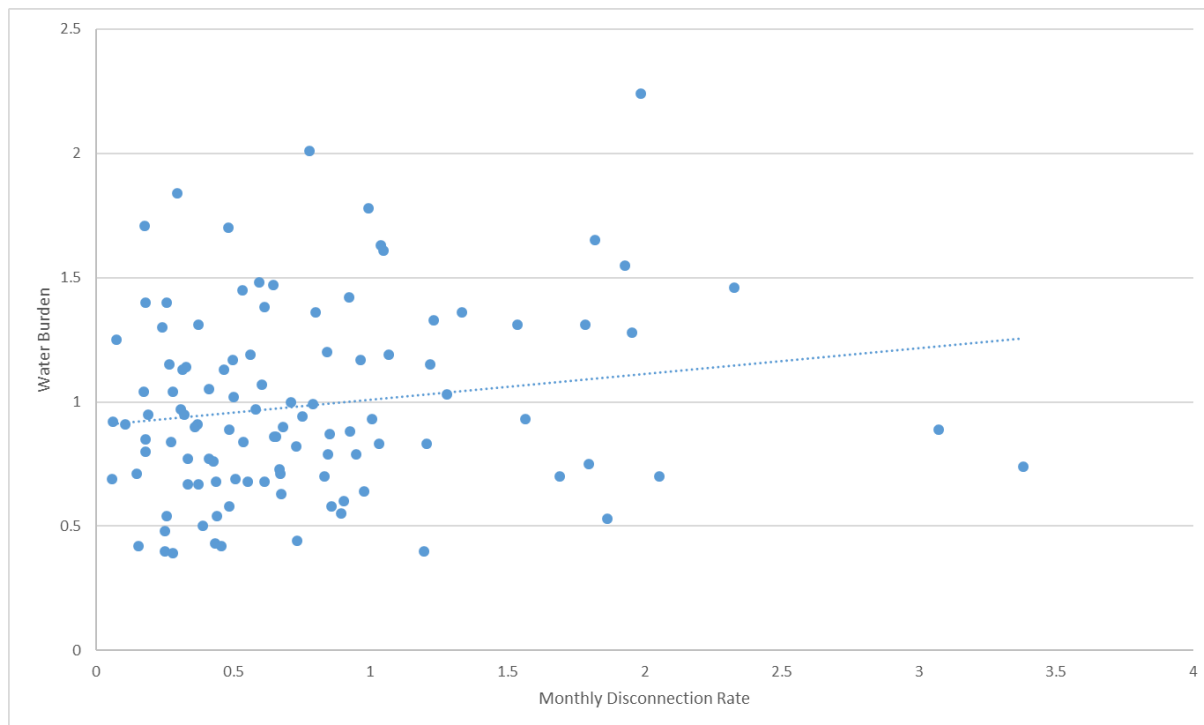


Figure 5: Plot of water burden against monthly disconnection rate

¹¹ The exception to our findings was a unique payment extension coupon program contained in Hardin County Water District No. 1 tariff. When a customer has a financial emergency that impacts their ability to pay their bill, they can request a coupon which will extend their payment due date. See <https://hcwd.com/wp-content/uploads/HCWD1-Tariff-Rev12012022.pdf>, at p.9. A customer who requests coupons must sign a payment extension agreement and can use up to four extensions in a 12-month period, each of which extends the due date of the bill for one month. Coupons cannot be used in consecutive months. The tariff states that an administrative fee will be added, but it is unclear from reviewing the tariff what fee this refers to. It is also unclear from the tariff whether a coupon is offered in lieu of a payment plan. A payment plan seeks to address the customer's inability to pay the required amount by spreading the payments out over a longer period of time. While it is unclear from the tariff exactly how the coupon system works, it does not appear to attempt to spread out the bill over time but instead merely delays payment for a month. That may merely compound the unaffordability issue for that household. Adding an administrative fee on top of that would further compound the household's difficulty in paying the bill.

Table 2: Water systems that rank in the top ten for disconnection rates and their corresponding water burden rank.

Water System	Water burden rank	Disconnection Rate
Hardin County Water District No. 1	78	1
Cannonsburg Water	59	2
Knott Co Water Sewer District	13	3
Laurel County Water District #2	84	4
Knox County Utility Commission	1	5
Whitley County Water District	26	6
Water Service Corporation of KY	10	7
Jessamine Water District #1	100	8
Hyden Leslie Water District	7	9
Bath County Water District	77	10

Table 3: Water systems that rank in the top 10 systems for having the highest water burdens and their corresponding ranking in terms of disconnection rate.

Water System	Water Burden Rank	Disconnection Rate
Knox County Utility Commission	1	5
Sandy Hook Water District	2	43
East Casey County Water District	3	93
Martin County	4	28
Cumberland County Water District	5	107
Rattlesnake Ridge Water District	6	72
Hyden Leslie Water District	7	9
Cawood Water District	8	25
Mountain Water District	9	24
Water Service Corporation of KY	10	7

Punitive Policies

Unfortunately, if a customer is having trouble affording their bill there are often utility policies in place that result in additional costs for these customers. All but thirteen water systems that we studied charge late fees of 10 percent. In addition, it is common for water systems to charge customers fees to disconnect and/or reconnect their water service. Only eighteen water systems charge disconnect fees but all but six systems charge reconnection fees, ranging from \$4 to \$125. Figure 6 shows the cost of average arrears at disconnection, in blue, and the fees charged to customers to disconnect and reconnect during regular business hours, in red. They cost as little as 0 percent to as much as 104 percent of the arrears a customer owes at disconnection. We also examined the level of minimum arrears for which a water system disconnected customers. The majority (68) of water systems are disconnecting customers who owe \$50 or less (Fig. 7). Twenty-eight water systems disconnected customers who owed less than \$30.

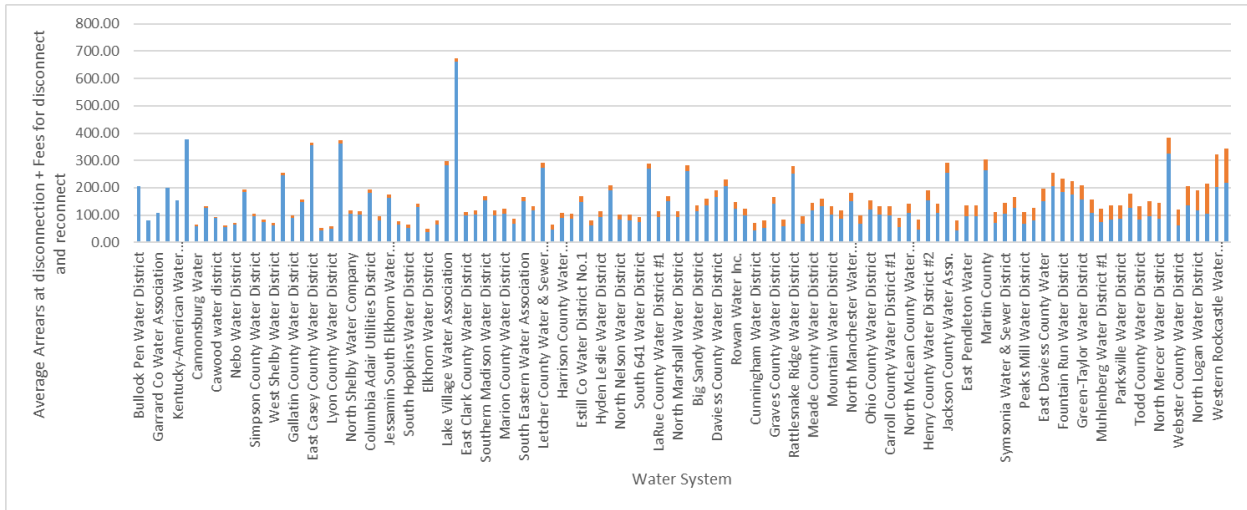


Figure 6: Average arrears for FY24 at disconnection for each water system (blue bar) and the additional cost of disconnect and/or reconnect fees (red bar).

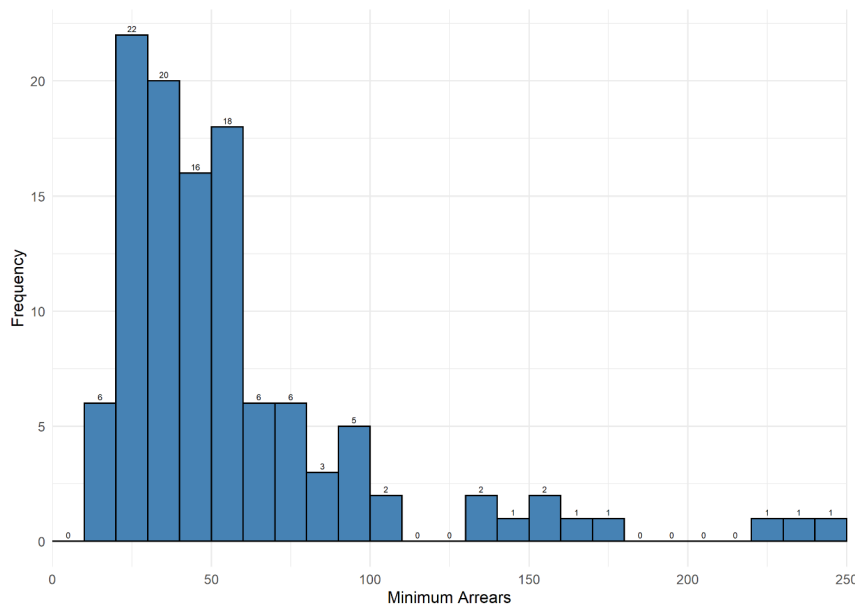


Figure 7: Minimum arrears at disconnection for FY24. Frequency indicates the number of water systems that fall into each range of arrears category.

Customer Assistance Funding Gap

We examined customer arrears at disconnection to assess what level of customer assistance funding is necessary in order to prevent disconnections. We find that it will cost between \$7 - \$8.5 million annually to prevent disconnections at this selection of water systems (Table 4).

Table 4: Annual cost of preventing disconnections

Year	Annual Cost to Prevent Disconnections
FY23	\$7,032,713.12
FY24	\$8,418,256.534

Conclusions & Recommendations

We found that nearly 57,000 drinking water disconnections occurred in FY24 across 114 water systems, an increase of 3.3% compared to FY23. Monthly disconnection rates ranged from 0.05 to 3.4 percent per month, with an average monthly disconnection rate of 0.77 percent. Roughly, that translates into an annual disconnection rate of 9 percent. Though limited, there are some surveys from across the U.S. and data from states that can help contextualize the severity of drinking water disconnections in Kentucky, revealing that Kentucky has concerningly high average rates of disconnection. A 2024 report from the U.S. Office of Community Services surveyed 1,882 water utilities in 2022 and found that the average annual rate of disconnections at these utilities was 5 percent, or approximately 0.41 percent per month.¹² A 2016 survey of 73 large community water systems conducted by Food and Water Watch also found an average annual disconnection rate of 5 percent.¹³ Data from other states, New Jersey and California, similarly suggest that rates of disconnection in Kentucky may be higher than other areas in the U.S. In New Jersey, annual shutoffs ranged from 0.6 to 4.3 percent annually.¹⁴ Data from California revealed that most systems had disconnection rates under 4 percent.¹⁵

The severity of drinking water disconnections in Kentucky makes customer assistance funding critical. The Federal Low-Income Household Water Assistance Program (LIHWAP), which granted funding to states and tribes to provide drinking water bill pay assistance was very successful in Kentucky. In our analysis, we calculate that over \$8 million is needed annually to prevent disconnections at the limited number of water systems included in our study. LIHWAP provided \$18.7 million to Kentucky families as both crisis and subsidy assistance beginning in December 2021, which was completely expended by June 2022, in just seven months.¹⁶ The demand for the LIHWAP program clearly indicates that customer assistance needs are far greater than

¹² Office of Community Services. (2024). Understanding Water Affordability Across Contexts: LIHWAP Water Utility Affordability Survey Report. Available at: <https://acf.gov/sites/default/files/documents/ocs/lihwap-survey-report-03-14-24.pdf>

¹³ Food and Water Watch. (2018). America's Secret Water Crisis: National Shutoff Survey Reveals Water Affordability Emergency Affecting Millions. Available at: https://www.foodandwaterwatch.org/wp-content/uploads/2021/03/rpt_1810_watershutoffs-web2.pdf

¹⁴ Levine, Larry and Susan Lee. (2025). Water Shutoffs—New NRDC Map Shows Hot Spots Across New Jersey. National Resources Defense Council. Available at: <https://www.nrdc.org/resources/water-shutoffs-new-nrdc-map-shows-hot-spots-across-new-jersey>

¹⁵ Feinstein, Laura and Abbey Warner. (2018). Water Service Disconnections in California. Pacific Institute. Available at: <https://pacinst.org/wp-content/uploads/2019/03/Water-Service-Disconnections-in-California-Fact-Sheet-Pacific-Institute.pdf>

¹⁶ National Association for State Community Services Program. Water Assistance and Partnership Guest Blog from Kentucky. Available at: <https://nascsp.org/water-assistance-and-partnership-guest-blog-from-kentucky/>

\$8 million annually. As seasonal trends in disconnections mirror those of electricity disconnections, it also suggests that customer assistance funding for electricity is also potentially a means through which to reduce overall utility burdens and both water and electricity disconnections. Customer assistance funding, however, is only one piece of a larger set of policy solutions that are needed to reduce water burdens and disconnections. Investments in water infrastructure funding can help reduce the cost of providing water for all customers whereas changes in rate design, such as lifeline rates and percentage of income payment plans, can help reduce cost burdens for low use and low income customers.

However, our research also shows that high/low water burdens do not always correlate with high/low rates of disconnections, suggesting that high water burdens do not have to result in high numbers of disconnections. Our review of utility tariffs revealed few differences in formal, written disconnection policies. Further investigation into the kinds of practices that water utilities are informally implementing around disconnections must be better understood. It would be beneficial for the PSC to further investigate this relationship and make transparent the kinds of practices utilities are implementing around disconnections. This information could make clear the kinds of practices that can be effective in keeping customers connected to water service in spite of high water bills and burdens.

Our work further illustrates that the financial burdens facing customers who are unable to pay their bills are often exacerbated through late fees, disconnect fees, and reconnect fees. In response to the COVID-19 pandemic, the Kentucky PSC issued a moratorium on disconnects and late fees. The PSC then studied the impacts of the moratorium and found that on-time payments did not decrease when late fees were prohibited.¹⁷ In other words, late fees do not incentivize on-time payments but are simply punitive. Customers who are unable to pay their bills are the ones likely being most harmed by late fees. We also found a very large discrepancy among water utilities for the amounts charged to disconnect and reconnect to service. As only 16 percent of water systems in our study charged disconnect fees, it is worthwhile to investigate why disconnect fees are necessary in these systems whereas the majority do not find it necessary to charge disconnect fees. Similarly, the range in costs to reconnect service are dramatic. The PSC should investigate why some water systems can afford to reconnect customers for as little as \$4 but others charge over \$100.

Last, it is clear that additional data are needed to improve policy solutions to prevent disconnections. More robust data collection is needed to better understand where problems are occurring, household level impacts, and why disconnections are occurring. As the data is currently reported, there is no link between disconnections and reconnections and utilities do not have to report how long households are remaining disconnected. Further, disconnection can be effected immediately without notice when customers default on payment plans. Currently there is no data on how often that is occurring, and therefore no way of knowing whether payment plans are effective.

Importantly, no data are provided for Kentucky's municipal water utilities that fall outside of the PSC's jurisdiction. There are 197 such systems in Kentucky. Anecdotally, we know that these include many small, struggling systems in areas of the state with high poverty. Not only are data entirely lacking on the level of disconnections in these systems, but also customers in these systems lack many of the basic consumer protections, as well as protections against excessive rates and poor service, that are afforded by PSC regulation. However, the United States Supreme Court has ensured some disconnection protections for municipal utility customers. In particular, in *Memphis Light, Gas, and Water Div. v. Craft*, 436 U.S. 1, 18 (1978), the Court held that due process requires that municipal utility customers be provided notice of pending disconnection and a process for dispute prior to disconnection to ensure against erroneous or arbitrary

¹⁷ See 9/21/20 PSC Order, p.3: https://psc.ky.gov/PSCSCF/2020%20cases/2020-00085/20200921_PSC_Order.pdf. (“[O]n-time payment rates for customers, that is, the percentage of customers who pay on time each month, has changed little, and in some instances increased, as compared to multiple periods preceding the outbreak of COVID-19 in Kentucky. Considering all utilities surveyed were unable to assess the late fees that nearly all of them ordinarily charge and were unable to disconnect for nonpayment, this result was unanticipated and indicates that late fees may have little impact on the timeliness of at least residential utility payments. Generally, the same percentage of customers who have always paid on time continued to do so during the first half of 2020. Simply put, the Commission finds that the evidence indicates that late fees have little discernible effect on the timeliness of residential customer payments for utility service.”)

withholding of essential utility service. But beyond the requirement of notice and an opportunity to dispute prior to disconnection, municipal utility customers have few protections. In particular, they lack the right to an extension of time to pay when a medical certificate is presented, and they do not have a right to negotiate a payment plan. The lack of even these meager protections for municipal utility customers makes it even more important to be able to analyze data on disconnections for nonpayment in Kentucky's municipal water systems.

In closing, we offer the following policy recommendations to help address water burdens and prevent harm from disconnections:

- Ensure that households throughout the state have the same levels of disconnection protections.
- Improve disconnection reporting and transparency.
 - Ensure that all water systems in Kentucky, including systems not regulated by the PSC, are required to report the same annual data on disconnections and reconnections.
 - Improve transparency around disconnections by 1) making disconnection data publicly available on a website hosted by the PSC or Kentucky's Energy and Environment Cabinet rather than only accessible through open records requests; and 2) requiring more transparency from utilities about their practices and policies concerning disconnections.
 - All utilities should report at the household level by zip code (where applicable) for each month – (a) the number of disconnection notices sent, the number of disconnections for nonpayment, and the number of reconnections; (b) the number of disconnections of households that have been disconnected for nonpayment in the preceding 24 months; (c) for each month's reconnections, report the longest, shortest, median, and average length of time between disconnect and reconnect; (d) the number of outstanding disconnections for which no reconnection has been accomplished; (e) the number of customers entering deferred payment arrangements, the number of successful completions of payment plans, and the number of defaults of payment plans; (f) the number of customers assessed late, disconnection, or reconnection fees, along with the amounts collected; and (g) the number of accounts and the dollar value of accounts written off as uncollectible (see [Appendix 1](#) for example reporting template).
 - In addition, utilities should report and make publicly available the number of total customers and the number of accounts in arrears broken down by the number between 30-60 days past due, 61-90 days past due, and over 90 days past due.
- Provide customer assistance to help prevent disconnections.
 - Create a permanent federal low-income water assistance program and, while that program is being established, provide \$500M in bridge funding in annual appropriations to be administered similar to the federal Low-Income Household Water Assistance Program (LIHWAP).
 - Create a state customer assistance program for household water and sewer bills that provides funding for both crisis assistance, when a customer is facing disconnection, as well as a bill subsidy program that provides funding for customers struggling to pay their water bill. Provide \$20 million annually.
- Make drinking water more affordable.
 - Ensure that the PSC has the express statutory authority to address high water burdens through equitable rate designs, arrearage management programs, and other measures that protect low-income customers and assure a more equitable distribution of costs. At minimum pass a resolution requiring the PSC to study affordability and propose policy solutions that can be pursued both in

the legislature and by the PSC.

- Create systems of data sharing among utilities and agencies that provide income-based utility assistance programs, so that water utilities have the data needed to identify their low-income customers so that they can target rate design, cost savings, and assistance measures to address the needs of those customers.¹⁸
- Eliminate unnecessarily punitive policies that exacerbate the hardship of unaffordable bills and disconnection.
 - Disallow late fees, especially on the bills of low-income customers.
 - Require the PSC to investigate the justifications for very different levels of disconnect and reconnect fees across utilities and aim to ensure that these fees are minimized or prohibited, especially for low-income customers.
 - Set a \$100 floor for minimum arrears at disconnection and require that the account must be in arrears at this level or higher for 30 days prior to disconnection.
 - To protect customers from prolonged periods of disconnection, prevent shutoffs late in the day close to the end of business hours (e.g. prohibit past 4:00pm). On days preceding holidays or weekends prohibit disconnections past 12:00pm.

¹⁸To learn more about the benefits of data sharing, see: <https://www.nrdc.org/resources/turn-tap>

Appendix I

		Zip Code 1	Zip Code 2	Zip Code 3
	Notices Sent			
	# Of Disconnections			
	# Of Reconnections			
Time Between Disconnection and Reconnection	Longest			
	Shortest			
	Median			
	Average			
	Repeat Disconnections during last 24 months			
	Outstanding Disconnections			
Deferred Payment Plans	# Of new customers entering payment plan			
	# Of defaults on payment plans			
	# Of payment plans completed			
Fees	# Of customers assessed late, reconnect, or disconnect fees			
	Amount of fees collected			
Bad Debt	# Of accounts deemed uncollectible			
	Amount written off as uncollectible			