

U.S. Senate Environment & Public Works Committee Minority Staff Analysis

Update: Current State Efforts to Protect Residents from Utility Disconnections

*Updated analysis shows eroding protections against water, gas and power shutoffs
as the coronavirus pandemic worsens*

July 23, 2020

The COVID-19 pandemic has instigated a public health, economic, and environmental justice crisis that is approaching its sixth month in the United States with no end in sight. Recent weeks have seen a substantial resurgence of COVID-19 infections, COVID-19 related hospitalizations, and COVID-19 related deaths. In the midst of this ongoing emergency, preserving residential utility services is essential for protecting public health.

After the pandemic's initial outbreak in March, states adopted a variety of approaches to protect residential customers from being disconnected from electricity, gas and water services. On April 29, the minority staff of the United States Senate Environment and Public Works Committee released a staff analysis tracking state government and other actions that ensure the continued provision of gas, electric and water service, which are particularly necessary for sustaining residential habitability and protecting public health. For each state, searches were conducted for executive orders and announcements from governors' offices regarding these services, orders and announcements from state utility regulators, typically known as public utility commissions, state legislative actions, and voluntary utility announcements.

Since that time, many states have made changes to their policies. This updated staff analysis reflects those changes.

Particular emphasis has been placed in this analysis on efforts to maintain residential water service. Safe reliable drinking water and the ability to wash one's hands or other surfaces that could be contaminated by SARS-COV-2 are vital to public health. On June 2, Phyn, a California-based company water monitoring company, [released an analysis](#) that estimated residential water consumption among single-family households in the United States had increased by 21 percent during the pandemic. Even under relatively favorable economic conditions, water service disconnections are common. In 2016, Food and Water Watch conducted a nationwide assessment of service disconnections to residential water customers. The organization found that "among responding utilities, more than half a million households lost water service for nonpayment,

affecting an estimated 1.4 million people in 2016.”¹

During the COVID-19 pandemic, communities of color are disproportionately suffering. Recently, the *New York Times* analyzed CDC COVID-19 data and found that African Americans and Latinos are incurring COVID-19 infections at a rate three times higher than white Americans.² In June, the CDC released data that showed residents in communities of color and Indigenous communities throughout the country are experiencing COVID-19-associated hospitalization rates that are approximately four to five times higher than white Americans.³ A preliminary analysis of age-adjusted COVID-related deaths, released by Yale University in May, showed that African Americans are more than three and a half times more likely to die than white Americans from COVID-19, while Latinos were nearly twice as likely to die as white Americans.⁴

These communities have also been severely impacted by other interrelated health and economic risks during the public health crisis. In May, Ranking Member Carper released a Committee staff report, *Pandemic of Pollution*, which documented how these at-risk communities typically experience higher than average exposure to air and water pollution. The report also discussed how recent research has discovered an emerging link between exposure to air pollution and adverse outcomes from exposure to COVID-19.

Communities of color have also shouldered a higher unemployment burden caused by the pandemic. The Bureau of Labor Statistics reported that in June, African Americans experienced an unemployment rate of 15.4 percent and Latinos a rate of 14.5 percent compared to unemployment rate of 10.1 percent for white Americans.⁵ Communities of color also typically have less access to quality health care, have a higher prevalence of pre-existing conditions which contribute to greater COVID-related hospitalizations and fatalities, comprise a disproportionately higher share of frontline workers who are at higher risk of exposure, and face greater housing cost burdens which leave residents of these communities more vulnerable to foreclosures and evictions.⁶ It is these very same communities that Food and Water Watch identified in its 2016 survey as suffering from the highest rates of water service disconnections.⁷

This analysis identifies many instances where orders to suspend service disconnections issued by state utility commissions do not apply to municipal utilities, because municipal utilities often fall outside the jurisdiction of state regulators. This is particularly relevant with respect to water service, since an estimated 82 percent of Americans receive their water from municipal water utilities.⁸ For each state, information provided by the Environmental Finance Center at the University of North Carolina was used to estimate the proportion of the state’s residents that

¹ https://www.foodandwaterwatch.org/sites/default/files/rpt_1810_watershutoffs-web2.pdf

² <https://www.nytimes.com/interactive/2020/07/05/us/coronavirus-latinos-african-americans-cdc-data.html?auth=login-facebook>

³ <https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/racial-ethnic-minorities.html>

⁴ <https://news.yale.edu/2020/05/19/new-analysis-quantifies-risk-covid-19-racial-ethnic-minorities>

⁵ <https://www.bls.gov/news.release/empsit.t02.htm>

⁶ https://www.jchs.harvard.edu/sites/default/files/Harvard_JCHS_State_of_the_Nations_Housing_2019.pdf

⁷ https://www.foodandwaterwatch.org/sites/default/files/rpt_1810_watershutoffs-web2.pdf

⁸ <https://www.cdc.gov/healthywater/drinking/public/index.html>

receive water from a municipal utility.⁹ In instances where state orders do not apply to municipal utilities, municipal authorities can adopt their own policies to suspend services disconnections, as some have done.¹⁰

As part of providing assistance to respond to the COVID-19 crisis, Congress is considering providing financial assistance to utility customers struggling with bills due to illness or job loss. Congress is also trying to decide whether, as a condition of receiving federal funding, to confer upon state and local governments and utilities the responsibility of ensuring that households remain connected, or are reconnected, to utility service during the COVID-19 crisis.

The following list categorizes how state authorities are or are not protecting their residents from utility disconnections as of July 23, 2020.

States that Have Mandatory Actions in Place to Ensure Sustained Utility Service for All Residents

10 states and the District of Columbia currently have effective moratoriums on utility disconnections for residential customers or enforceable measures to ensure that all or the vast majority of residents are protected from disconnection of gas, electric, and water utilities service.

When this report was first released on April 29, 15 states were listed in this category. Since then, several developments have occurred:

1. Six states – Colorado, Connecticut, Kansas, Mississippi, Montana, and Ohio – have been removed from this category, because these states either allowed previous legal protections to expire or subsequent announcements have clarified that existing protections did not extend to all residential utility consumers.
2. Kentucky has been added to this category, because in May, Governor Beshear issued an executive order placing a moratorium on all utilities service disconnections, including utilities services which were not under the jurisdiction of the moratorium issued by the Kentucky Public Service Commission in March.
3. New York has been added to this category, because in June the state passed legislation that established a new moratorium on all New York utility providers disconnecting water, gas, and electric service to residential customers due to non-payment.

⁹ For the purposes of this release, the term “municipal” is synonymous with “government-owned.” The overwhelming majority of government-owned utilities are owned and operated by municipalities, but some government owned utilities are owned and overseen by county or regional government bodies. These utilities are included in the figures that refer to municipal utility customers.

https://efc.sog.unc.edu/sites/default/files/2018/FINAL_Pathways%20to%20Rate-Funded%20CAPs.pdf

¹⁰ Austin, TX, Minneapolis, MN and Stateboro, GA are all examples of municipal authorities that have suspended disconnections. A complete list of applicable municipal actions has not yet been compiled.

States that currently restrict all utility disconnections:

- [California](#)
- [Delaware](#)
- [District of Columbia](#)¹¹
- [Kentucky](#)
- [Maine](#)
- [Maryland](#)¹²
- [New Hampshire](#)¹³
- [New York](#)¹⁴
- [North Carolina](#)¹⁵
- [Washington](#)¹⁶
- [Wisconsin](#)

States that Provide Partial Protection against Disconnection of Residential Utility Services

22 states have steps in effect that partially restrict or discourage utility disconnections. These measures offer residents some degree of protection from utility disconnections, but do not guarantee uninterrupted gas, electric and water service to all residents.

When this report was first released on April 29, 22 states were also listed in this category, but since then several developments have occurred, and the states included in this category have changed:

1. Connecticut, initially believed to have issued mandatory protections, has been added to this category, because it released additional information that made clear that not all residential utilities customers were protected.
2. Two states – Indiana and Ohio –have been added to this category, because executive orders signed by the states’ governors protecting all residential utility customers from disconnections have ended. However, in both states, Public Utilities Commissions have since issued orders that provides some protection for residents from utility companies disconnecting service.
3. Two states – Arkansas and New Mexico –which had been previously believed to have taken no action to protect residential utility service, have been added to this category because they released information about existing measures which provide partial protection against residential utility disconnections.

¹¹ Legislative moratorium on service disconnection expires on August 11, 2020

¹² Order extended to August 1, 2020

¹³ Order extended to August 7, 2020

¹⁴ Legislative moratorium extends 180 days beyond the expiration of the state of emergency, no later than March 31, 2021

¹⁵ Order extended to July 29, 2020

¹⁶ Order extended to July 28, 2020

4. Oregon has been added to this category, because the Oregon Public Utilities Commission has informed Democratic staff of the U.S. Senate Committee on Environment and Public Works that it has worked to secure voluntary commitments from all Oregon regulated utilities to suspend disconnections.
5. Four states – Iowa, South Carolina, Texas and West Virginia – have been dropped from this category, because the protective measures that were in place in those states have since expired.
6. Kentucky has been removed from this category and added to the first category of states with more protective measures, because in May, Governor Beshear issued an executive order placing a moratorium on all utilities service disconnections, including utilities services which were not under the jurisdiction of the moratorium issued by the Kentucky Public Service Commission in March.
7. New York has been removed from this category and added to the first category of states with more protective measures, because in June the state passed legislation that prohibits all utility providers from disconnecting water, gas and, electric service to residential customers due to non-payment.

States that currently partially restrict utility disconnections:

- [Alaska](#) – Alaska Senate Bill 241 imposes a moratorium on disconnections of residential gas, electric and water services, but the moratorium only applies to state-regulated utilities which does not include municipal utilities. In Alaska, approximately 70 percent of residential water customers receive service from a municipal utility.
- [Arizona](#) - Governor Ducey announced a cooperative agreement with major electric providers to suspend disconnections to residential customers. Authorities have not announced any steps to suspend or restrict service disconnections for residential gas or water customers.
- [Arkansas](#) – The Arkansas Public Service Commission issued an order suspending disconnections for residential gas, electric and services, but its jurisdiction only extends to privately-owned utilities.¹⁷ ¹⁸ In Arkansas, approximately 93 percent of residential water customers receive service from a municipal utility.
- [Connecticut](#) – The Connecticut Public Utilities Regulatory Authority issued an order suspending disconnections for residential gas, electric and water services, but its

¹⁷ A list of Arkansas municipal electric providers can be found at <https://www.publicpower.org/public-power-arkansas>

¹⁸ Order expires on August 3, 2020

jurisdiction only extends to privately-owned utilities.^{19,20} In Connecticut, approximately 64 percent of residential water customers receive service from a municipal utility. The Connecticut Department of Public Health, which regulates all water utilities, recommended that municipal water utilities in addition to privately-owned water utilities, also suspend disconnections to residential customers for non-payment, but the Department of Public Health's recommendation is not mandatory.

- [Florida](#) – The Florida Public Service Commission announced that regulated electric utilities have voluntarily suspended disconnections. Authorities have not announced any steps to suspend or restrict service disconnections for residential gas or water customers. On April 30, the Florida-Times Union [reported](#) that the City of Green Cove Springs would resume utility disconnections for non-payment on May 8. The City of Green Cove Springs provides electricity and water service to residential customers with its service area. On June 22, the Treasure Coast News reported that the Fort Pierce Utility Authority in Fort Pierce, FL would resume utility disconnections for non-payment, starting on July 27.
- [Illinois](#) – The Illinois Commerce Commission issued an order prohibiting gas, electric, and water disconnections, but its jurisdiction only extends to privately-owned utilities and does not include municipal utilities^{21 22}. In Illinois, approximately 90 percent of residential water customers receive service from a municipal utility. On June 10, the Lawrenceville Daily Record [reported](#) that the City of Bridgeport, Illinois will resume water disconnections in August. On July 10, the Chicago Tribune [reported](#) that the village of Dalton, Illinois has resumed water service disconnection of delinquent customers on July 7.
- [Indiana](#) – Governor Holcomb's March 19 executive order, which banned utilities from disconnecting service, expired on July 1. However, on June 29, the Indiana Utility Regulatory Commission (IURC) issued an order which extended the ban on disconnections by regulated utilities through August 14. The IURC order extends to all electricity and gas utilities and some water utilities, including some municipal water authorities.²³
- [Louisiana](#) - The Louisiana Public Service Commission issued an order prohibiting utility disconnections, but its jurisdiction only extends to privately-owned gas, electric and water utilities and does not include municipal utilities.²⁴ In Louisiana, approximately 77 percent of residential water customers receive service from a municipal utility. On May

¹⁹ Order extended to September 9, 2020

²⁰ A list of Connecticut municipal electric providers can be found at <https://www.publicpower.org/public-power-connecticut>

²¹ Order extended to September 1, or 30 days after all Illinois Health Regions have moved to phase 4.

²² A list of Illinois municipal electric providers can be found at <https://www.publicpower.org/public-power-illinois>

²³ A list of which water utilities are regulated by the IRUC can be found at: <https://www.in.gov/iurc/2339.htm>

²⁴ A list of Louisiana municipal electric providers can be found at <https://www.publicpower.org/public-power-louisiana>

27, the American Press [reported](#) that the City of Leesville, Louisiana would resume water service disconnections for non-payment on June 1.

- [Massachusetts](#) – The Massachusetts Department of Public Utilities issued an order prohibiting gas, electric, and water disconnections, but its jurisdiction only extends to privately-owned utilities and does not include municipal utilities.²⁵ In Massachusetts, approximately 97 percent of residential water customers receive service from a municipal utility.
- [Michigan](#) – Governor Whitmer issued executive order 2020-144 suspending disconnections of water services to all residents.²⁶ Authorities have not issued a statewide moratorium on disconnections of residential gas and electric customers.²⁷
- [Minnesota](#) – The Minnesota Public Utilities Commission requested that regulated gas and electric utilities extend protection of the state’s Cold Weather Rule, which does not uniformly prohibit the disconnection of gas and electric services to residential customers. Rather, it restricts disconnections and requires gas and electric utilities to provide a payment plan option for customers to make payments within their means before utilities can proceed with a service disconnection. Authorities have not announced any steps to suspend or restrict service disconnections for residential water customers.
- [Nebraska](#) – The Nebraska Public Service Commission has issued an order suspending disconnection of natural gas services to residential customers. Authorities have not announced any steps to suspend or restrict service disconnections for residential electric and water customers.
- [Nevada](#) - Governor Sisolak announced, “[Nevada] utilities have committed to maintaining all services regardless of a resident’s ability to pay.” No information has been found regarding whether this announcement applies to all gas, electric and water or just state-regulated utilities, which does not include municipal utilities. In Nevada, approximately 97 percent of residential water customers receive service from a municipal utility.
- [New Jersey](#) - Governor Murphy announced, “[New Jersey Board of Public Utilities] has confirmed that, in cooperation with our utility companies, all utility shut-off orders have been voluntarily and universally suspended for the time-being.”²⁸ The New Jersey PBU’s regulatory jurisdiction does not extend to municipal utilities, and New Jersey authorities have not provided information to clarify whether municipal utilities are covered by this

²⁵ A list of Massachusetts municipal electric providers can be found at <https://www.publicpower.org/public-power-massachusetts>

²⁶ Order expires December 31, 2020

²⁷ A Michigan Public Service Commission [order](#), which instituted limited measures that protected some vulnerable communities against service disconnections, expired on June 12.

²⁸ Governor Murphy’s office has confirmed to staff of the Environment and Public Works Committee that as of July 20, 2020, all regulated utility companies have continued to voluntarily suspend shut-offs.

announcement.²⁹ In New Jersey, approximately 63 percent of residential water customers receive service from a municipal utility.

- [New Mexico](#) – The New Mexico Public Regulation Commission issued an order suspending disconnection of natural gas, water and electric service to residential customers, but its jurisdiction only extends to privately-owned utilities. In New Mexico, approximately 91 percent of residential water customers receive service from a municipal utility.³⁰
- [Ohio](#) – The Public Utilities Commission of Ohio (PUCO) issued an order which requires regulated utilities to seek approval from PUCO for utility service disconnections.³¹ PUCO’s jurisdiction extends to private gas, electric and water utilities, but does not extend to municipal or cooperative utilities.^{32,33} In Ohio, approximately 70 percent of residential water customers receive service from a municipal utility.³⁴ On May 28, WKBN News [reported](#) that the City of Youngstown would resume disconnection of water service for non-payment starting June 1. On June 3, the Cleveland County Herald [reported](#) that the City of Rison, Ohio would resume disconnections of water service due to non-payment, which had been suspended in late March, after June 20. On June 29, the Ferry Times Leader [reported](#) that the village of Barnesville, Ohio would resume water disconnections for delinquent customers on July 10. On June 30, the Dayton Daily News [reported](#) the City of Dayton would resume water disconnections for delinquent customers on July 14.
- [Oregon](#) – The Oregon Public Utilities Commission (PUC) has informed staff of the U.S. Senate Committee on Environment and Public Works that all regulated utilities in the state have voluntarily agreed to suspend disconnections. No Oregon regulated utility has withdrawn from this voluntary commitment as of July 15. The PUC’s jurisdiction only extends to privately-owned utilities and does not include municipal utilities.³⁵ In Oregon, approximately 96 percent of residential water customers receive service from a municipal utility. On June 9, KLCC radio [reported](#) that the City of Albany, Oregon would resume utility disconnections, on July 1.
- [Pennsylvania](#) - The Pennsylvania Public Utility Commission issued an order prohibiting regulated utilities from disconnecting residential customers from service. Its jurisdiction

²⁹ A list of New Jersey municipal electric providers can be found at <https://www.publicpower.org/public-power-new-jersey>

³⁰ A list New Mexico Jersey municipal electric providers can be found at <https://www.publicpower.org/public-power-new-mexico>

³¹ Order to expire December 31, 2020 or the end of the emergency declaration.

³² On March 31, 2020, the Ohio Environmental Protection Agency issued an order placing a moratorium on services disconnections by all Ohio municipal water systems, but that order expired on July 10, 2020.

³³ Several Ohio utilities have [filed proposed plans](#) to begin resuming service disconnections due to non-payment with the Public Utilities Commission of Ohio, beginning as early as July 29, 2020. Those plans are still pending PUCO’s approval.

³⁴ A list of Ohio municipal electric providers can be found at <https://www.publicpower.org/public-power-ohio>

³⁵ A list of Oregon municipal electric providers can be found at <https://www.publicpower.org/public-power-oregon>

extends to all gas, privately-owned electric and some water utilities^{36, 37}. Most municipal water utilities are not covered by the order.

- [Rhode Island](#) – The Rhode Island Public Utilities Commission extended some provisions of an order which suspend disconnections for all Rhode Island gas and electric customers.³⁸ The provisions of the previous order that imposed a similar moratorium on disconnections by regulated water utilities expired on July 17, 2020.
- [Tennessee](#) – The Tennessee Public Utility Commission issued an emergency order suspending the disconnections of utility services.³⁹ Its jurisdiction extends only to privately-owned gas, water, and electric utilities, and does not include municipal utilities. In Tennessee, approximately 94 percent of residential water customers receive service from a municipal utility. On June 17, ClarksvilleNow.com [reported](#) that Clarksville Gas & Water would return to regular billing procedures in mid-July, which includes service shutoffs for nonpayment.
- [Vermont](#) – The Vermont Public Utilities Commission issued an order suspending disconnection of gas and electric service to residential customers. The Vermont Public Utilities Commission issued an order suspending disconnection of gas and electric service to residential customers.⁴⁰ The Commission issued a separate order suspending disconnection of regulated water service, but the Commission’s jurisdiction does not include municipal water utilities. In Vermont, approximately 85 percent of residential water customers receive service from a municipal utility.
- [Virginia](#) – The Virginia State Corporation Commission issued an order suspending disconnection of gas, electric and water services to privately own utilities.⁴¹ Its jurisdiction does not extend to municipal utilities. In Virginia, approximately 93 percent of residential water customers receive service from a municipal utility.

States that Have Not Taken Effective Action to Ensure Sustained Utility Service to Residents

18 states either have no existing protections against residential utility disconnections or they have not provided information in a readily available manner as to how or whether residents will effectively be protected from disconnection of either electric, gas or water services.

³⁶ A list of Pennsylvania municipal electric providers can be found at <https://www.publicpower.org/public-power-pennsylvania>

³⁷ The Pennsylvania Public Utility Commission’s jurisdiction over water utilities cover all privately owned and some municipal water utilities. Most municipal water utilities are not under the jurisdiction of the Commission. A list of regulated utilities can be found at http://www.puc.state.pa.us/consumer_info/water/wastewater/water_utilities.aspx

³⁸ Order effectively extended to April 15, 2021.

³⁹ Governor Bill Lee’s [emergency declaration](#), upon which the TPUC order follows has been [extended](#) to August 29, 2020.

⁴⁰ Orders extended to July 31, 2020

⁴¹ Order extended to August 31, 2020,

When this report was first released on April 29, 13 states fell into this category. Since then several developments have occurred:

1. Eight states – Colorado, Iowa, Kansas, Montana, Mississippi, South Carolina, Texas and West Virginia – have had orders or comprehensive voluntary programs expire, and have been added to this category.
2. Two states – Arkansas and New Mexico – have been removed from this category, because they released information about existing measures which provide partial protection against residential utility disconnections.
3. Oregon has been removed from this category, because the Oregon Public Utilities Commission has informed staff of the U.S. Senate Committee on Environment and Public Works that all regulated utilities have voluntarily agreed to suspend disconnections.

States that currently do not offer protections against residential utility disconnections:

- Alabama – On June 16, WPMI [reported](#) that Prichard Water Works and Sewer Board, which serves Chickasaw, Alabama, had resumed water shutoffs for some delinquent customers starting on June 1, after voluntarily suspending disconnections.
- Colorado⁴²
- Georgia – On May 27, WRDW [reported](#) that the City of Grovetown, Georgia, which had voluntarily suspended water disconnections would resume service disconnections for non-payment on June 29. On July 10, the Atlanta Journal Constitution [reported](#) that the City of Fayetteville would resume utility disconnections due to non-payment starting on July 19, after voluntarily suspending disconnections.
- Hawaii
- Iowa⁴³
- Idaho – On June 3, the Idaho State Journal [reported](#) that the City of Pocatello, which had voluntarily suspended water disconnections since late March will resume water disconnections for non-payment starting on July 7. On July 15, the Twin-Falls Times News [reported](#) that the City of Twin-Falls, Idaho had announced it was resuming water disconnections due to non-payment after voluntary suspending disconnections.
- Kansas⁴⁴
- Montana⁴⁵
- Mississippi⁴⁶ – On July 4, the Columbus Dispatch of Columbus Mississippi [reported](#) that Columbus Light and Water had been disconnecting service of “40 to 50 customers a day

⁴² Governor Polis’s order which prohibited regulated utilities from disconnecting customers expired on June 15, 2020; <https://www.colorado.gov/pacific/dora/moratorium-on-utility-disconnections-expires>

⁴³ An Iowa Utilities Board order that suspended utility disconnections for regulated utilities expired on May 1, 2020.

⁴⁴ A temporary Executive Order signed by Governor Kelly prohibiting utility disconnections expired on May 1, 2020.

⁴⁵ An emergency Executive Order, signed by Governor Bullock, prohibiting utility disconnections expired on May 24, 2020.

⁴⁶ A Mississippi Public Service Commission temporary order suspending disconnections of utility service expired on May 14, 2020.

due to unpaid bills,” since Mississippi’s moratorium on disconnections had expired in May. According to the Dispatch, this figure represents a 50 percent increase on shutoff compared to pre-COVID norms. Columbus Light and Water General Manager estimated that 8 percent or over 1000 customers were at risk of being disconnected.

- Missouri
- North Dakota
- Oklahoma – On June 11, the Shawnee News Star [reported](#) that the City of Ardmore, Oklahoma would resume water disconnections for non-payment. City officials said that of the approximately 11,500 customers receiving city water, over 700 have past due bills.
- South Carolina⁴⁷ – On July 6, WCIV in Charleston, South Carolina [reported](#) that Charleston Water System would resume service disconnections for non-payment in mid-August.
- South Dakota
- Texas⁴⁸ – On June 18, the Beaumont Enterprise [reported](#) that the City of Beaumont would resume water disconnections for delinquent customers starting on July 6. On June 19, the City of Fort Worth, which had suspended water disconnections since March 13, announced that disconnections would resume on September 8.
- Utah
- West Virginia⁴⁹
- Wyoming

⁴⁷ A South Carolina Public Service Commission order suspending disconnections for regulated utility customers Order expired on May 14, 2020

⁴⁸ A Public Utility Commission of Texas emergency order suspending the disconnection of regulated electric and water services Order expired on June 13, 2020

⁴⁹ On June 17, the Public Service Commission of West Virginia issued an [order](#) rescinding its moratorium on utility service disconnections. In accordance with the order, utilities were authorized to resume disconnections on July 1, 2020.