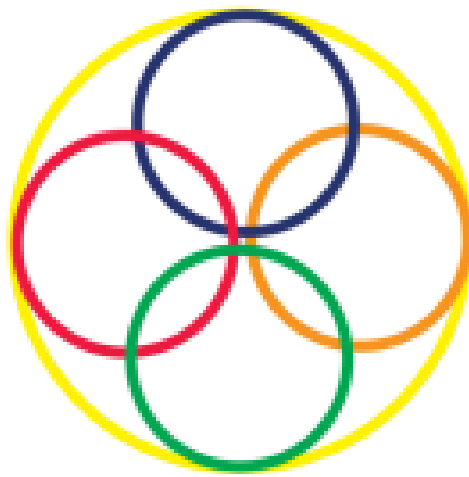


2022

# Model Statute: Utility Shutoff and Debt Data Transparency



**ENERGY  
DEMOCRACY  
PROJECT**

The Energy Democracy Project  
Utility Debt Jubilee Working Group  
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# FAQ

## **Why do we need a utility data transparency law?**

Access to data held by private utility companies is critical to understanding how policies around shutoffs, debt, and collections affect the affordability and accessibility of utility service. Reporting by zip code or census tract allows matching of outcomes with demographic information such as income and race, to better understand how a utility's disconnection and other credit and collection policies impact communities. Armed with this knowledge, advocates can challenge utility actions, either by working with regulators, utilities, and advocates, or if necessary, through litigation, to remedy inequitable and discriminatory policies.

## **Isn't reporting all these data at the zip code/census tract level too complicated?**

No. Utility companies should already track most of the data in the Model Statute, and they know their customers' addresses. Thus, reporting affordability data by zip code is a simple matter of organizing the credit and collections data the utility already has by zip code. In Illinois, for example, investor-owned energy and water utilities are required to report many of the data in the Model Statute by zip code. Organizing the data by census tract will require steps beyond existing data organization.

## **My utility says it treats all its customers equally, so any differences between neighborhoods aren't its fault. If data are reported at the zip code/census tract level, will the utilities become defensive in response to claims of discrimination once the zip code level impact differences are highlighted?**

Even neutrally applied policies can have differential or discriminatory effects. Designing equitable policies requires regulators and utilities to consider how utility policies affect different groups differently and to take affirmative steps to address those inequities. It also provides an opportunity for advocates to remind utilities and regulators that access to uninterrupted essential utility service is necessary for public health and safety, and to engage in everyday life, including access to the internet and online learning and job acquisition. Moreover, utilities enjoy monopoly status. With that status comes public service obligations. There is nowhere else for customers who cannot afford essential utility service to turn to obtain that service. Utilities are obliged to revisit credit and collection policies that negatively impact certain communities to ensure the promise of universal service.

## **My utility says that complying with the law will require costly changes to its operating procedures and IT systems. Won't the law ultimately result in higher utility bills for ratepayers?**

Utilities frequently complain that stakeholder requests for more public-facing information or data will be burdensome and increase customer costs. These arguments should be rejected on their face given the fact that the data already exists within their credit and collections departments and that costs of organizing the data or updating IT systems will be spread across all ratepayers with negligible increases in rates. In some cases, it may be possible to comply with the Model Statute simply by tracking and reporting data in an Excel spreadsheet and filing it with a state commission. That said, depending on how a utility currently tracks and stores customer information, some changes to internal systems may be needed. Many private utilities are large companies with huge budgets that can easily accommodate such changes at negligible ratepayer expense. Moreover, we believe any costs will be outweighed by the benefits of increased

transparency, which will facilitate the development of better affordability policies to the financial benefit of all ratepayers.

**What about small, financially struggling utilities?**

Section 7 and the optional language at the end of the Model Statute provide two ways to support small utilities to comply with the law. Section 7 would allow the Commission to support smaller utilities with technical assistance and grants. Ideally, this section would be paired with an appropriations bill allocating funding for this purpose. The optional language would allow regulators to exempt smaller utilities from certain requirements of the law, too, if they can show that complying would cause an unjust and unreasonable rate increase.

**Aren't there privacy concerns with publicly disclosing information about shutoffs and debt?**

All data disclosed under the Model Statute are aggregated at the zip code/census tract level, so they will not contain personal information traceable to any individual customer. Section 5 of the Model Statute also specifically states that no personally identifiable information shall be disclosed under the law. This allows regulators to exempt information from disclosure in the unlikely event that a privacy concern arises.

# Bill Summary – Utility Data Transparency Model Statute

## Preamble.

The Preamble sets out legislative findings and the goals of the Model Statute.

## Section 1. Definitions.

Section 1 defines key terms in the Model Statute. The term “public utilities” is defined to include all publicly- and privately-owned electric, gas, water, wastewater, and stormwater utilities.

## Section 2. Monthly reporting by public utilities; Commission to establish standards for monthly reporting; Reported data to be public; Online reporting allowed.

Section 2 requires that public utilities publicly report, by census tract and zip code, certain data related to service disconnections, fees and penalties, arrearages, customer assistance programs, and credit and collections practices. The Commission is instructed to establish uniform standards for the reported data, which must be made publicly available on the Commission’s website in executable, electronic spreadsheet format. The Commission is also authorized to create an online reporting system for utilities.

## Section 3. Annual reporting by public utilities; Annual reporting by Commission.

Section 3 requires every public utility to prepare an annual report summarizing: its available customer assistance programs; its policies concerning service disconnections and debt collection; how it communicates with its customers about assistance programs and disconnections and collections policies; and its schedule of rates and charges.

Section 3 also requires the Commission to prepare an annual report that includes: a plain language summary of the data reported by public utilities under Section 2; the Commission’s assessment of whether this data reveals a significant issue impacting the public health, safety, and welfare; the Commission’s assessment of the impact of utility policies on affordability and access to service; and the Commission’s assessment of whether additional data should be reported.

## Section 4. Commission to open proceeding on reporting of historical data; Commission to establish manner and format of historical reporting; Report by Commission making findings and recommendations.

Section 4 instructs the Commission to open a proceeding to on the reporting of historical data concerning customer assistance programs, service disconnections, and debt collection. After the proceeding closes, the Commission must prepare a report containing a plain language summary of any reported historical data and the Commission’s assessment of the effect of utility policies on affordability and access to service during the historical reporting period. The Commission must also publish copies of the raw data reported under this Section.

Section 5. Data privacy.

Section 5 specifies that information reported under the Model Statute shall not contain personally identifiable information of any customer.

Section 6. Commission jurisdiction.

Section 6 clarifies that, for purposes of the Model Statute, the Commission's jurisdiction extends to all public utilities (as defined in Section 1).

Section 7. Technical assistance for small public utilities.

Section 7 authorizes the Commission to provide technical and financial assistance for small public utilities to comply with the Model Statute. The Commission is also authorized to provide grants to non-profit organizations to provide technical assistance to small, rural, and tribal municipalities to assist with compliance with the Model Statute.

[Optional language]

This optional language would allow the Commission to create alternative reporting requirements to those in Section 2 for individual small public utilities, if the utility shows that compliance would result in an unjust and unreasonable rate increase. Certain information must still be reported.

# UTILITY DATA TRANSPARENCY MODEL STATUTE

## Preamble:

The [Legislature] finds that access to services of public utilities, as providers of electricity, heating fuels, water and wastewater services, is vital and necessary to modern life. Disconnections of essential utility service jeopardize public health and safety and the health and safety of vulnerable households, including seniors, persons with pre-existing medical conditions and young children. Access to transparent, regularly reported credit and collections data, including but not limited to disconnection and reconnection rates, late fees, deferred payment arrangement information, and other credit and collections activity, is critical to assessing the affordability of essential utility services.

The [Legislature] further finds that requiring utilities to report this data by zip code and U.S. Census tract will provide the Commission with critical insights into how communities within a service territory are impacted by a utility's credit and collections policies. It is in the interest of [State] to ensure that economically disadvantaged [State] residents are not harmed by utility disconnection and other credit and collections policies. To promote those interests, the [Legislature] hereby creates this Act to increase public access to community-specific utilities credit and collections data. The [Legislature] further finds that public access to utility credit and collections data are essential to ensure equitable credit and collections policies and improve affordability.

## (1) Definitions

"Commission" means the Commerce Commission, Public Service Commission, Public Utilities Commission or other governmental entity of similar form and function of [State].

"Confirmed low-income status" means any customer enrolled in any income-qualified customer assistance program including federal and state "SafetyNet" and entitlement programs.

"Customer assistance program" means any program intended to assist customers to afford to pay periodic utility service charges or manage their outstanding arrearages, including, but not limited to, federal, state, municipally or ratepayer-funded bill assistance programs, percentage-of-income payment plans, discounted rate programs, arrearage management or debt forgiveness programs, and conservation or efficiency assistance programs.

*The first sentence of this section is copied from a resolution on data collection approved by the National Association of Regulatory Utility Commissioners and the National Association of State Utility Consumer Advocates in 2019. See <https://nasuca.org/wp-content/uploads/2018/11/2019-07-NASUCA-Data-Collection-Resolution-Joint-with-NARUC-Final.pdf>. Advocates can point to this resolution as support for the policies in this model bill.*

*"Legislature": Although this bill is framed as state legislation, a similar policy could be enacted by a state utility commission or board, municipality, county, regional authority, or any other entity with jurisdiction over utility issues. The term "Legislature" should be replaced with the name of the entity enacting the law or policy.*

*Section 1: The definitions in this section are expressed in general terms. When adapting this statute for use in a particular state or locality, many terms can and should be replaced by state-specific terms of art based on local laws.*

“Medical protection program” means any program, rule, or statute that limits or prohibits service disconnections based on the medical condition or needs of the customer or a member of the customer’s household, or such individuals’ use or need for electrically powered life sustaining medical equipment such as, but not limited to, ventilators, defibrillators, oxygen concentrators, electric heart pumps, and nebulizers.

*“Medical protection program”:* Many states have specific programs that protect customers from shutoffs based on the customer’s medical condition or the season, temperature, or extreme weather. The following definitions should be updated to specifically name any programs in the state.

“Seasonal protection program” means any program, rule, or statute that limits or prohibits service disconnections based on the month or time of year.

“Extreme weather protection program” means any program, rule, or statute that limits or prohibits service disconnections based on high or low temperatures or other extreme weather.

“Personally identifiable information” means any representation of information that permits the identity of an individual to whom the information applies to be reasonably inferred by either direct or indirect means, including information that can be used to distinguish or trace an individual’s identity—such as name, social security number, biometric data records—either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual (e.g., date and place of birth, mother’s maiden name, etc.).

*“Public utility”:* The intent is for this model bill to apply to all utility providers, regardless of size, ownership structure, or type of utility service provided. State-specific language should be inserted to cover all types of public entities known to own or operate utility systems in the state. For example, the terms “corporation or regulatory authority” could be expanded to include cities, towns, villages, counties, municipalities, or special districts, as appropriate. Drafters could also include a reference to the laws that authorize each of those types of entities to provide utility service.

“Public utility” means any privately or publicly owned electric, gas, water, wastewater, or stormwater corporation or regulatory authority that provides goods or services to customers.

“Small public utility” means a public utility that serves less than 10,000 people or has annual gross revenues of \$250,000 or less.

**(2) Monthly reporting by public utilities; Commission to establish standards for monthly reporting; Reported data to be public; Online reporting allowed.**

*Section 2:* This section provides a framework for monthly reporting of geographic data by utility companies, as well as a list of specific affordability-related data points to be reported. The listed data points represent the information that the authors believe is most important to understanding issues related to affordability, debt, and consumer protections. However, the list could be updated to include other data points—such as data on service reliability, energy efficiency programs, grid infrastructure investments, or anything else.

(a) Monthly reporting by public utilities. Each public utility shall by the 15<sup>th</sup> day of each month file with the Commission and make publicly available in executable, electronic spreadsheet format the following information, organized by type of utility service provided, customer class, confirmed low-income status, census tract, and zip code, for the immediately preceding month:

- (1) the number of customers on the last day of each month.

*“...census tract, and zip code...”:* There are advantages and disadvantages to reporting



(2) the total dollar amount billed to and collected from customers; the average amount billed to and collected from customers; and the average utility usage per customer.

(3) the number of customers receiving assistance under each applicable utility assistance program on the last day of each month.

(4) the number of customers receiving disconnection notices due to bill non-payment.

(5) the number of customers disconnected due to bill non-payment.

(6) the number of customers whose service was reconnected after being disconnected due to bill non-payment.

(7) the average time between service disconnection due to non-payment and service reconnection.

(8) the number of customers that became eligible for disconnection due to bill non-payment but were not disconnected because of a medical protection program.

(9) the number of customers that became eligible for disconnection due to bill non-payment but were not disconnected because of a seasonal protection program.

(10) the number of customers that became eligible for disconnection due to bill non-payment but were not disconnected because of an extreme weather protection program.

(11) the number of customers that became eligible for disconnection due to bill non-payment but were not disconnected because of any legally mandated or voluntary suspension of disconnections other than the reasons in subsections 2(a)(8), (9), or (10).

(12) the number of customers charged late fees; and the total dollar amount and average amount of those fees.

(13) the number of customers charged reconnection fees; and the total dollar amount and average amount of those fees.

(14) the number of customers charged penalties other than late fees and reconnection fees; and the total dollar amount and average amount of those penalties.

*data at different geographic resolutions. Zip code data is relatively easy for utility companies to provide, since they already possess customer address information, and is granular enough to allow for reasonably detailed analysis. However, it is more difficult (though by no means impossible) to compare zip code data against U.S. Census data on income or race, since that information is reported at the Census tract level. Reporting at the Census tract level allows for easier comparison with data on race and income, but may require extra work by the utility company.*

*Subsections (8) through (10) should be updated to reference the specific protection programs available in your state or locality. Where multiple protection programs exist, the statute should include a separate bullet for each program. For example, New York state provides two medical protection programs—one for customers with medical certificates and one for customers with life saving equipment. In that case, subsection (8) should be divided into two separate subsections, one for each program.*

*Subsection 14 should be updated to specifically reference any penalties charged by local utilities in addition to late fees and reconnection fees.*

(15) the number of customers in arrears by 30, 60, and 90 days on the last day of each month; and the total dollar amount owed and average amount owed by customers in each of those categories.

(16) the number of customers enrolled in deferred payment agreements on the last day of each month; the total dollar amount and average amount of arrears owed by customers subject to those agreements; and the average length of the repayment term under those agreements.

(17) the number of customers that entered a new deferred payment agreement; the number of customers that successfully completed a deferred payment agreement; the number of customers that defaulted from a deferred payment agreement; and the total dollar amount of arrears and average per-customer amount of arrears for customers subject to those agreements.

(18) the number of customers whose accounts were referred to a third party for the purpose of debt collection; and the number of customers contacted by the utility to inform them that their account debt has been reported to a third party for the purpose of debt collection.

(19) the number of customers whose accounts were reported to a credit reporting agency; and the number of customers contacted by the utility to inform them that their account debt has been reported to a credit reporting agency.

(20) as applicable, the number of liens on real property placed, sold, or enforced due to non-payment of utility accounts.

(21) such additional information as the Commission shall determine is prudent to accomplish the goals of this Act and promote the public health, safety, and welfare.

(b) Commission to establish standards for monthly reporting. The Commission shall establish uniform standards for the reporting of data by public utilities pursuant to subsection 2(a). In establishing such uniform standards, the Commission shall seek to maximize the accuracy, preciseness, and comparability of data disclosed by public utilities pursuant to subsection 2(a).

(c) Reported data to be publicly disclosed on Commission website. The Commission shall make each monthly report submitted by each public utility pursuant to subsection 2(a) publicly available on its website in executable, electronic spreadsheet format within 30 days of receipt.

*The time periods in subsection 15 should ideally reflect the thresholds that local utility companies use in their collection practices, where this information is known. For example, if local utilities generally turn over accounts to collection agencies at 180 days, this information should go up to at least 180 days.*

(d). Online reporting allowed. Notwithstanding the requirements of subsection 2(a), the Commission may establish an online reporting system and require each public utility to report using the online reporting system instead of filing information in executable, electronic spreadsheet format; provided that the requirements of 2(c) shall still apply.

**(3) Annual reporting by public utilities; Annual reporting by Commission**

(a) Annual reporting by public utilities. Each public utility shall, within 30 days of the effective date of this Act, and annually thereafter, file with the Commission a written report containing the following information, in such manner and format as the Commission shall require:

(1) a description of available customer assistance programs, including terms of eligibility; available budget for each program; any changes to the programs during the reporting year; and any planned future changes to the programs.

(2) the public utility's benchmarks, goals, or targets concerning customer assistance programs, if any; and the public utility's performance relative to those benchmarks, goals, or targets during the reporting year.

(3) the public utility's policies concerning service disconnections, including the minimum amount of arrears that must accumulate before a customer is issued a disconnection notice, the minimum time between non-payment and issuance of a disconnection notice, and the minimum time between issuance of a disconnection notice and disconnection of service; and how, if at all, those policies differ based on a customer's assessed risk, payment history, or other factors.

(4) the public utility's policies concerning debt collection, including the minimum amount of arrears that must accumulate before a customer's account is sent to a third party for the purpose of debt collection; and how, if at all, those policies differ based on a customer's assessed risk, payment history, or other factors.

(5) excluding any customer-specific communications, the methods and contents of communications to customers concerning available customer assistance programs; service disconnections; debt collection; and customer rights and remedies, including medical protection programs, seasonal protection programs, and extreme weather protection programs.

(6) the public utility's schedule of rates and charges. As used in this paragraph, "rates" mean the fixed component, if any, and the volumetric or other variable component, if any, of the cost of service that

are applied to a category of customers and "charges" mean amounts that are billed to a customer under specific circumstances that are not included in the provider's base rate including, but not limited to, late fees, connection fees, impact fees for new development, deposits for opening new accounts, and any other fees, surcharges, or penalties.

(b) Annual reporting by Commission. The Commission shall, by January 31<sup>st</sup> of each calendar year, prepare and publish a report containing the following information:

(1) a plain language summary of the data reported by public utilities pursuant to section 2(a) for the reporting year, including any significant trends or changes concerning customer assistance programs, service disconnections, and debt collection.

(2) the Commission's assessment of the impact of customer assistance programs, service disconnection policies, and collections policies on the affordability and accessibility of utility service, including whether certain customer segments, by zip code, income level, and racial group, are disproportionately impacted by a public utility's disconnections and collections policies.

(3) the Commission's assessment of whether additional data reporting is prudent to understand and address issues related to the affordability and accessibility of utility service.

(4) the Commission's assessment of whether the data reported by public utilities pursuant to section 2(a) indicates the existence of a significant issue impacting the public health, safety, or welfare that requires further investigation by the Commission or other public officials.

**(4) Commission to open proceeding on reporting of historical data; Commission to establish manner and format of historical reporting; Report by Commission making findings and recommendations**

(a) Commission to open proceeding on reporting of historical data. The Commission shall, within 30 days of the effective date of this Act, open a proceeding concerning the reporting by public utilities of historical data concerning customer assistance programs, service disconnections, and debt collection, including: the number of customers enrolled in customer assistance programs; the number of service disconnections; the number of service reconnections; the number of customers in arrears and the total dollar amount owned and average amount owed by those customers; and such other information as the Commission deems appropriate to promote the public health, safety, and welfare.

(b) Commission to establish manner and format of historical reporting. The Commission shall establish the manner and format for the reporting of historical data by public utilities pursuant to subsection 4(a). In determining the manner and format of such reporting, the Commission shall seek to maximize the comparability of historical data with data disclosed by public utilities pursuant to section 2(a).

(c) Report by Commission making findings and recommendations. The Commission shall, within 30 days of the closure of the proceeding established pursuant to subsection 4(a), prepare and publish a report containing the following information:

(1) a plain language summary of the data reported by public utilities pursuant to subsection 4(a), including any significant trends or changes concerning customer assistance programs, service disconnections, and collections during the historical reporting period.

(2) the Commission's assessment of the impact of customer assistance programs, service disconnection policies, and collections policies on the affordability and accessibility of utility service during the historical reporting period.

(3) copies of the raw data reported by public utilities pursuant to subsection 4(a).

**(5) Data privacy.**

Notwithstanding any other provisions in this section, any information disclosed pursuant to subsections 2(a), 3(a), or 4(a) or pursuant to any order by the Commission implementing this section shall not include the personally identifiable information of any customer.

**(6) Commission jurisdiction.**

Every public utility shall be subject to the jurisdiction of the Commission for the purposes of implementing and enforcing this Act.

**(7) Technical assistance for small public utilities.**

Within the amounts appropriated and available, the Commission shall provide technical and financial assistance to any small public utility to develop and implement data collection requirements in accordance with this Act. Within the amounts appropriated and available, the Commission is also authorized to provide grants to non-profit organizations to provide technical assistance to rural, small, and tribal municipalities for the purpose of planning, developing, and implementing the data collection requirements under this Act.

*Section 6: It may be helpful to add references to the specific laws granting the Commission jurisdiction over public utilities, including laws establishing specific enforcement powers. This can prevent any confusion about the extent of the Commission's authority to implement the law.*

*Section 7: Ideally, this model bill should be paired with an appropriations provision allocating funding for technical assistance, financial assistance, and grantmaking under this section.*

**Optional language—2(e) Alternative standards for small public utilities.**

Notwithstanding the requirements of subsections 2(a) and 2(b), upon a written showing by a small public utility that compliance with the reporting requirements of subsections 2(a) and 2(b) would result in an unjust and unreasonable rate increase, the Commission may establish alternative reporting requirements for the small public utility; provided that the data reported by small public utilities shall include the information in subsections 2(a)(1), (3), (4), (5), (6), (12), and (16). In establishing such alternative standards, the Commission shall seek to maximize the accuracy, preciseness, and comparability of data disclosed by the small public utility.

*Optional language: Depending on their financial situation and administrative capacity, as well as the amounts available for technical and financial assistance under section (7) above, smaller public utilities may face challenges meeting the same data reporting standards as larger utilities. If this presents a barrier, this section provides some suggested alternative language allowing the Commission to adopt more flexible requirements for small utilities, while retaining the most important data points. It is alternative language because the strong preference is for uniform standards, with support where needed.*

# Additional Resources

## Other Laws and Bills

- [New Jersey law](#) (enacted September 2022).
  - Requires all electric, gas and water utilities to publicly report monthly zip code data on shutoffs, debt, liens, penalties, and customer assistance programs.
- [Illinois law](#), 220 ILCS5/8-201.10, Section 201.10 (enacted September 2021).
  - Requires investor-owned electric, gas, and water utilities to publicly report monthly zip code data on shutoffs, debt, penalties, and deferred payment arrangements.
- [New York bill](#) (introduced March 2021).
- [Michigan bill](#) (introduced March 2021).
- [Minnesota bill](#) (introduced March 2019) (inactive).
- [Maintaining Access to Essential Services Act of 2021](#), S.1783, Section 2(g)(3) (introduced March 2021).

## Analysis

- [The Incidence of Extreme Economic Stress: Evidence from Utility Disconnections](#), an analysis by Steve Cicala of ComEd/Ameren disconnection data showing disparate impacts on Black and Brown communities in Illinois.
- [The Need for Utility Reporting of Key Credit and Collections Data Now and After the Covid-19 Crisis](#), by John Howat, National Consumer Law Center.
- National Association of State Utility Consumer Advocates' [Resolution on Best Practices in Data Collection and Reporting for Utility Services Delinquencies in Payments and Disconnections of Service](#).
- [Power Crisis](#), a report on home shutoffs by Greer Ryan, Center for Biological Diversity.

## Resources on Regulation

- Energy Democracy Project's [Model Rule on Debt Forgiveness and Shutoff Moratoria](#)
- [Advancing Equity in Utility Legislation](#), by Chandra Farley, Partnership for Southern Equity; John Howat and Jenifer Bosco, National Consumer Law Center; Nidhi Thakar and Jake Wise, Portland General Electric; and Jean Su, Center for Biological Diversity.
- Natural Resources Defense Council and National Consumer Law Center, Water Affordability Advocacy Toolkit, [Data Collection and Transparency](#) module. For the full report, see [here](#).

## Other Resources

- Energy Democracy Project's [People's Utility Justice Playbook and People's History of Utilities](#).

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