Near the Breaking Point: Rising Utility Costs and the Unique Risks for Affordable Housing Owners and Residents

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ABSTRACT

Electricity prices are surging across the country, having increased by nearly 39% from April 2021 to April 2026 (Heatmap News and MIT 2026). The subsidized affordable housing sector faces unique risks from rising electricity costs. Affordable housing policy requires that housing payments cover both the cost of rent and a reasonable consumption of utilities. The inextricable relationship between rent and utilities in subsidized affordable housing thus results in certain scenarios where utility allowances must increase to cover rising utilities costs and rent payments must decrease to ensure homes remain affordable for residents.

Stewards of Affordable Housing for the Future (SAHF) is a nonprofit organization representing 13 nonprofit affordable housing providers. The breadth of SAHF's portfolio provides visibility for trends in residential utility rates in different electricity markets across the country. This paper analyzes how residential utility rates affect utility allowance schedules. We then provide an analysis on how these changes affect property financial performance and stabilization by assessing impacts to net operating income. For example, we find that rate increases result in an approximate $23 per month increase in utility allowances and a potential subsequent $23 decrease in rent in affordable housing properties in Washington, DC. This represents an annual risk of $34,497 in lost rent for the average SAHF property in the city, if that property were to require rent adjustments. We then discuss these rent adjustments within the context of rent arrears and operating budgets. We conclude with recommendations for affordable housing providers for new and existing properties.

Introduction

After decades of stability, residential electricity costs in the United States are currently experiencing historic increases (Batra et al., 2025). The rise of electricity rates is due to several intersecting factors, including but not limited to surging electricity demand from data centers, supply chain constraints for generation equipment, loss of incentives for renewable energy generation, and infrastructure upgrades to make the grid more resilient and durable (Anderson 2025; Buschbaum and Kahn-Lang 2025). Due to the process by which utility rates are set, these cost drivers trickle down to the residential customers, and, often, result in increases to monthly residential bills. However, for both owners and residents of subsidized affordable housing, increases in residential electricity rates materialize subtly in different ways.

Policies and programs are structured so that residents of subsidized affordable housing pay no more than 30% of their income to their housing costs, inclusive of the cost of utilities. Many residents receive financial assistance to cover both the cost of rent and the cost of utilities and if utilities increase, then, in certain cases, rent will decrease to ensure residents do not exceed that 30% threshold. The portion of housing subsidies that cover utilities is referred to as a utility allowance. Utility allowances vary in how they are determined and are directly tied to the

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specific subsidy type at the property. For residents of properties with Section 8 Property-Based Rental Assistance, the utility allowance is set based on the actual energy and water consumption of the property (White 2012). But for residents at properties with project-based vouchers or some Low-Income Housing Tax Credit (LIHTC) properties, utility allowances can be set using a utility allowance schedule (White 2012).

Utility allowance schedules are policy documents that state the total subsidy for utilities for a household based on several characteristics of the subsidized unit, including the number of bedrooms and the fuel source for various end-uses such as space heating, water heating, and cooking. Using the utility allowance schedule, the total utility allowance for the household is then calculated. Figure 1 references the District of Columbia Housing Authority's utility allowance schedule for illustrative purposes.

Figure 1. DC Housing Authority Utility Allowance Schedule

Allowances for Tenant-Furnished Utilities and Other Services

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

UApro utility allowance online

Locality	Green Discount	Unit Type	Weather Code	Date (mm/dd/yyyy)
District of Columbia HA - Section 8	**None**	**Manufactured**	**20001**	**10/1/2025**

Utility or Service		Monthly Dollar Allowances								
		0 BR	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR	7 BR	8 BR
Space Heatin	Natural Gas	$32	$37	$43	$48	$54	$59	$65	$70	$76
	Bottled Gas	$28	$33	$38	$43	$48	$53	$58	$63	$68
	Electric Resistance	$66	$78	$81	$83	$85	$88	$90	$93	$95
	Electric Heat Pump	$30	$35	$41	$47	$52	$57	$63	$68	$74
	Fuel Oil	$75	$89	$102	$115	$128	$141	$154	$167	$180
Cooking	Natural Gas	$4	$4	$6	$8	$10	$12	$14	$16	$18
	Bottled Gas	$3	$4	$6	$8	$9	$11	$13	$14	$16
	Electric	$8	$9	$14	$20	$24	$29	$34	$39	$44
	Other									
Other Electric		$39	$47	$67	$89	$111	$134	$155	$177	$199
Air Conditioning		$13	$15	$25	$36	$46	$57	$67	$78	$88
Water Heatin	Natural Gas	$11	$13	$19	$24	$30	$36	$42	$47	$53
	Bottled Gas	$10	$11	$17	$22	$27	$32	$37	$43	$48
	Electric	$24	$30	$41	$49	$58	$67	$76	$85	$95
	Fuel Oil	$26	$31	$44	$58	$71	$85	$98	$112	$125
Water		$35	$38	$65	$92	$120	$147	$175	$202	$230
Sewer		$58	$65	$106	$147	$188	$229	$270	$311	$352
Electric Fee		$21	$21	$21	$21	$21	$21	$21	$21	$21
Natural Gas Fee		$17	$17	$17	$17	$17	$17	$17	$17	$17
Fuel Oil Fee										
Bottled Gas Fee										
Trash Collection										
Range/Microwave		$22	$22	$22	$22	$22	$22	$22	$22	$22
Refrigerator		$25	$25	$25	$25	$25	$25	$25	$25	$25
Other - specify										

Actual Family Allowances To be used by the family to compute allowance.
Complete below for the actual unit rented

Utility or Service	per month cost
Heating	$
Cooking	
Other Electric	
Air Conditioning	
Water Heating	
Water	
Sewer	
Trash Collection	
Range/Microwave	
Refrigerator	
Other	
Total	$

Name of Family

Address of Unit

Number of Bedrooms

Spreadsheet based on form HUD-52667.

Source: District of Columbia Housing Authority (2026)

Utility allowance schedules are determined by the local public housing authority (PHA) and, in theory, are meant to cover the costs associated with the "reasonable consumption of utilities by an energy-conservative household" (Federal Register 24 CFR § 965.505(a)). In practice, however, PHAs have the authority to calculate utility allowance schedules at their discretion (Federal Register 24 CFR § 965.505(a)). This results in an inherent decentralization in how utility allowance schedules are determined. PHAs must share their methodology with HUD and receive the agency's approval, but they do not need to share this with the general public,

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making it difficult to know exactly what specific factors the PHAs incorporate into their methodologies (Federal Register 24 CFR § 965.505(a)). That said, utility rates, as the basis for household costs, are considered by all PHAs for the purpose of setting utility allowance schedules. Utility allowance schedules have a direct impact on a property owner's ability to set rent and thus consequentially influence the operating budget of an affordable housing property.

Stewards of Affordable Housing for the Future (SAHF) is a nonprofit organization representing 13 nonprofit affordable housing providers that collectively own and operate over 160,000 multifamily rental housing units in 49 states. The breadth of SAHF's portfolio provides visibility for residential utility rates in different electricity markets across the country. In this paper, we begin with a discussion on electric utility rates, utility allowance schedules, and the implications for rent setting. We then use the Department of Housing and Urban Development's (HUD) Utility Schedule Model (HUSM) to estimate impacts of higher rates on utility allowance schedules and the associated rent adjustments and impacts to property net operating income (NOI) (HUD 2016).[1] We then move into a discussion on the relationship between utility rates, residents' ability to pay rent, and impacts to property operating budgets within the broader context of existing stressors to operating budgets, with a specific focus on rent arrears. We conclude with recommendations to affordable housing providers on how to plan for rising rates for new and existing properties.

Rising Utility Rates, Changing Utility Allowance Schedules, and Downward Pressure on Rents

In the subsidized affordable housing sector, residents receive assistance for housing costs, which is inclusive of both the cost of rent and the cost of utilities. As mentioned previously, the portion of assistance that covers utilities is known as a utility allowance. Total housing costs are capped depending on the specific subsidy that the property or resident participates in. For HUD-assisted housing, the cap is determined by household income. For properties participating in the LIHTC program, the maximum allowable rent is determined by the Gross Rent. As a result, utility allowance schedules and rents thus exist in a delicate balance with one another. This relationship is illustrated by the diagram below:

Figure 2. Total Tenant Payment or Gross Rent in Subsidized Affordable Housing

[1] HUD's Housing Utility Schedule Model tool is a publicly available tool that may be used by Public Housing Authorities for the purposes of determining utility allowance schedules (HUD 2023).

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Utility rates present themselves as a hidden variable in this equation. As the basis of utility allowance payments, the upward pressure rates put on utility allowances can necessitate an equal reduction in the rent paid by the tenant if the unit is rented at the maximum allowable rent (as determined by the subsidy). Thus, the spillover effect of rising utility rates then becomes lost rental income to the owner. Importantly, residents receiving utility allowances still pay a utility bill that may be less or greater than their utility allowance for reasons that may or may not be within their control.

Data Sources and Methodology

Data Sources

We began our analysis by analyzing the SAHF portfolio and identifying the wholesale power markets with the largest SAHF footprint by the number of units. This yielded three key markets: California Independent System Operator (CAISO), PJM Interconnection, and Independent System Operator New England (ISO-NE). After identifying target wholesale power markets, we then identified specific utilities operating in these markets based on SAHF footprint and member interest in the housing market served by the utility. These utilities were San Diego Gas & Electric (SDG&E), Southern California Edison (SCE), Eversource Massachusetts (MA), Pepco, and ComEd.

For each utility, we collected utility rates using Heatmap News' and the Massachusetts Institute of Technology's (MIT) (2026) Electricity Price Hub. The HUSM tool (which we expand on in greater detail below) requires winter and summer rates, and we assumed winter rates begin in November and that the summer rates begin in May across utilities. For the baseline scenario, we used rates in November 2024 and May 2025 for winter and summer rates, respectively. To forecast estimated changes to utility allowance schedules in the future, we used rates in November 2025 and May 2026 for winter and summer rates, respectively.

Across the country, reasons why rates are increasing differ. For example, utilities in CAISO typically cited infrastructure upgrades, particularly wildfire-proofing transmission and distribution infrastructure, and increasing electrification as the two key reasons for seeking an increase (SDG&E n.d.). Meanwhile in the PJM market, capacity auction prices increased the supply price of electricity (Monitoring Analytics 2026). Cost drivers in the utility space are complex and multivariate, but the effects remain the same: higher rates for consumers.[2]

[2] Analyzing how specific cost drivers increase rates is outside the scope of this analysis.

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Table 1 below lists the bundled flat electricity rates that we used for both the baseline and forecasted scenarios in the HUSM tool.

Table 1. Data inputs for determining baseline and forecasted electricity rate scenarios

Market	Utility	Baseline		Forecast	
		November 2024 ($/kWh)	May 2025 ($/kWh)	November 2025 ($/kWh)	May 2026 ($/kWh)
CAISO	SCE	0.34	0.34	0.38	0.38
	SDG&E	0.46	0.48	0.46	0.52
ISO-NE	Eversource	0.35	0.35	0.36	0.36
PJM	ComEd	0.17	0.21	0.19	0.24
	Pepco	0.19	0.20	0.23	0.24

Data Source: Heatmap News and MIT 2026

Using these rates, we used HUD's HUSM tool to estimate the utility allowance schedule of both the baseline case and the forecasted or proposed rate.

Methodology and HUD Utility Schedule Model Tool

Our methodology relied on the HUSM tool to estimate utility allowance schedules across the utility service territories. The tool considers several factors, including climate, building type, number of bedrooms, equipment efficiency, and other factors.[3] After inputting the electricity rates from Table 1 into the tool, the tool provided the baseline and forecasted scenarios for each of the utility service territories. For this analysis, all utility allowance estimates are for one-bedroom, all-electric units with air conditioning in a typical large multifamily building of 5 or greater units (i.e., not Energy Star- or green building-certified).[4]

Taking the difference between the total utility allowance between the baseline and forecasted case, we then multiplied this figure to the average SAHF property (based on number of units) in the relevant state that the utility operates in. The result reveals the monthly lost rent, which we then multiplied by 12 to ascertain the annual risk to property NOI of rising electricity rates.

Limitations

HUD has not updated the HUSM tool since 2016 (HUD 2016). This means that it does not account for shifts in climate data in terms of number of heating and cooling degree days. Updated climate data is necessary to understand the cost of air conditioning and electric heating, resulting in slightly inaccurate cost estimates for these end-uses. The tool also does not

[3] The HUSM relies on zip codes to determine climate data. For SCE, we used a Rancho Cucamonga-based zip code; for SDG&E, a San Diego-based zip code; for Eversource, a Boston-based zip code; for ComEd, a Chicago-based zip code; and for Pepco, a Washington, DC-based zip code.

[4] All-electric affordable housing units receive utility allowance payments for electric space heating (using heat pumps), electric cooking, electric water heating, other electric (e.g., plug loads, lighting, etc.), and air conditioning. PHAs are not required to provide utility allowances for air conditioning, but we included them in the analysis as the need for air conditioning increases in the future.

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accommodate for newer, nontraditional electric tariff rate design, such as time-of-use rates. Therefore, we opted to use the bundled electricity rate, which includes supply charges, demand charges, fixed fees, and other charges.

Lastly, PHAs may use methodologies to calculate utility allowances that do not solely, if at all, rely on the HUSM tool; actual utility allowance schedules in the future may vary from our forecasted scenarios. However, as mentioned previously, PHAs are not required to publicly disclose their methodologies for determining utility allowance schedules, so the HUSM presents the sole resource for the public to understand, predict, and plan for how utility allowance schedules may change due to rising utility costs.

Results

Using the HUSM tool, our analysis methodology yielded the following results on utility allowances and total annual risk to NOI:

Table 2. Annual risk to property NOI by market and utility based on HUSM

Wholesale Power Market	State	Utility	Baseline Monthly Utility Allowance (per unit)	Forecasted Monthly Utility Allowance (per unit)	Difference (per unit)	Average SAHF Property Size in State (number of units)	Estimated Maximum Loss to Annual NOI
CAISO	CA	SCE	$166	$186	$19	88	$20,497
		SDG&E	$174	$214	$41		$42,876
ISO-NE	MA	Eversource	$199	$204	$5	101	$6,117
PJM	DC	Pepco	$108	$131	$23	125	$34,497
	IL	ComEd	$108	$123	$15	98	$17,395

As seen in the table above, seemingly slight increases to electricity by the order of 2 to 4 cents, as shown in Table 1, can have substantial and significant impacts to the NOI of subsidized affordable housing properties. The difference between baseline and forecasted monthly utility allowance adjustments range between $5 to $41 per month. These adjustments result in potential operating losses between $6,117 and $42,876 depending on the state and property size.

Discussion

As shown through our analysis, rapid rises in residential electricity rates can result in significant shifts in monthly utility allowances for residents, which in turn results in significant losses to property NOI due to the requirement to lower rent by the same amount that utility allowances increase (in certain scenarios). But rising electricity rates are just one of several factors that are currently stressing the operating budgets of affordable housing properties and the

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household budgets of residents residing in those properties. In this section, we situate rising electricity rates within these other stressors, particularly the strain of rent arrears, and discuss them in more detail.

Rental delinquency and utility bills are highly correlated. According to research by Samarripas and Jarrah (2024) and Samarripas and Lee (2024), residents that are behind on their utility bills are also likely to be in arrears with their rent, and this relationship worsens depending on how often residents struggle to pay their utility bills. As mentioned previously, utility allowances do not directly cover utility bills, so residents may still experience challenges with paying utility bills on time if the allowance is insufficient in covering resident bills. Further challenges, such as living in energy inefficient housing, may drive up the cost of resident bills. These factors may limit the ability of residents to pay rent to affordable housing property owners. According to internal SAHF data, the average property arrears in four jurisdictions included in analysis range from $34,441 to $413,125, as shown in Table 3 below.

Table 3. Average total arrears per property

State	Average SAHF Property Size in State (number of units)	Average property arrears per unit	Average total arrears per property
CA	88	$524	$46,112
DC	125	$3,305	$413,125
IL	98	$440	$43,120
MA	101	$341	$34,441

Data source: Internal SAHF data. Note: Average property arrears data represents cumulative arrears of households living in SAHF-member properties during the one-year period ending March 31st, 2025. Sample sizes used to determine average property arrears per unit are as follows: CA (88 properties), DC (12 properties), IL (83 properties), MA (88 properties).

When the risk of rent loss due to utility allowance adjustments is combined with the existing stress of property arrears, total estimated risk to property operating budgets increases drastically depending on the jurisdiction, as shown in Table 4 below:

Table 4. Total Estimated Risk to Operating Budgets

State	Estimated Maximum Loss to Annual NOI Due to Utility Allowance Adjustments	Average Total Property Arrears	Total Estimated Risk to Operating Budgets
CA	$42,876	$46,112	$88,988
DC	$34,497	$413,125	$447,622
IL	$17,395	$43,120	$60,515
MA	$6,117	$34,441	$40,558

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As the table above indicates, rent loss due to utility allowance adjustments in combination with the already-unfolding arrears crisis in several states may result in severe financial distress for property operating budgets. Due to the significant price escalation in a short period of time, subsidized affordable housing properties may not be fully equipped to financially weather the impacts, depleting already-low operating budgets. Operational deficits significantly impact an owner's ability to maintain and preserve an affordable housing property, which includes making energy efficiency upgrades, as well as providing services to residents. In some cases, the owner may be forced to sell the property to investors who may not choose to extend the property's affordability restriction. As a result, displacement of residents at the property may occur.

It is important to note that energy efficiency is not a viable solution to the risk that rising utility allowances pose to affordable housing properties. Many utility allowances do not account for the energy efficiency of the property, and, therefore, regardless of how well the property performs, the owner will still need to lower rents to accommodate the rise in utility allowances. In other words, this is a problem that arises squarely from housing policy and the formula illustrated by Figure 1. Energy efficiency improvements may help lower resident bills and allow them to pay rent on time, but some reports have emerged that electricity rate increases are so stark that energy efficiency improvements still do not prevent bills from increasing (Abamu 2026). Therefore, solutions to the problem of rapidly rising electricity rates must originate from within the affordable housing regulatory structure.

Recommendations for Policymakers and Utilities

In this section, we discuss steps that PHAs and utility providers can take to prevent rising utility rates from destabilizing affordable housing properties.

Recommendations for Public Housing Authorities

- *Include heat pumps in utility allowance schedules.* Many PHAs still do not include heat pumps for space heating in their utility allowance schedules, and this serves as a disincentive for heat pump adoption. However, when heat pumps are included, this creates the potential to alleviate some of the impacts to operating deficits because the utility allowance for a heat pump is typically lower than one for electric resistance heating. Without a separate allowance, heat pumps and electric resistance heating are treated equally by utility allowance schedules.

Recommendations for Utilities

- *Offer nonprofit rates to affordable housing providers.* Some utilities, like PG&E, offer a discount to nonprofit affordable housing providers (PG&E, n.d.). However, these programs are still not widely available. Expanding these offerings can help affordable housing reduce owner-paid meters and create space within operating budgets to absorb impacts from other stressors.
- *Expand low-income discount programs.* As mentioned previously, the ability to pay rent and the ability to pay utilities are closely linked. Providing discounts to low-income households, who make up the population of subsidized affordable housing properties, can

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help households manage costs and potentially result in both utilities and rent being paid on time.

Recommendations for Affordable Housing Providers

Affordable housing providers can take several steps to prepare themselves and their residents for the increase in utility rates and the subsequent changes to utility allowance schedules. We provide the following recommendations:

- *Engage residents on their utility bills and explain why they are increasing and how to prepare*. In particular, fixed-income households will be hit harder by rising electricity costs, and many utilities offer low-income and senior rates. So, owners can consider working with resident services to provide information about energy assistance programs that can help them earn discounts on their utility bills.
- *Review portfolio for properties where utility allowance revisions may result in rent changes*. As mentioned at the beginning of this paper, these utility allowance changes are going to affect those properties that are renting units at or near the maximum allowable rents. Providers can review their portfolio to identify these properties to better understand their exposure to these risks.
- *Consider battery energy storage systems to arbitrage energy costs if applicable*. In markets with time-of-use rates, battery energy storage systems may provide an opportunity to arbitrage energy costs by charging when energy is cheaper and dispatching when it is expensive.
- *Prepare for owner-paid bills to increase*. Though outside the scope of this analysis, affordable housing providers should be aware that bills for owner-paid meters will also increase and become an additional stressor on property operating income.
- *Consider solar as an investment that may reduce bills.* As electricity rates rise, the economics of solar will also change – even without federal tax credits. Reducing reliance on the grid via installing onsite solar may become an attractive option for reducing owner and resident bills.

Conclusion

Rising electricity rates pose a significant risk to residents and affordable housing providers. This risk comes at a time when affordable housing providers face a general crisis in arrears and on-time payment of rent. Together, these risks result in major operational deficits for affordable housing providers, straining their ability to maintain their properties and provide safe and affordable housing for their residents. These risks may also exacerbate the split incentive to electrification in multifamily affordable housing, delaying efforts to electrify and decarbonize buildings. However, there are practical steps that both affordable housing providers and policymakers can take to limit rising utility costs from actively destabilizing affordable housing communities. These steps will require planning and coordination but will ultimately lead to a more affordable future.

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