



2017

Utility Consumer Activities Report and Evaluation

Pennsylvania Public Utility Commission



Utility Consumer Activities Report and Evaluation 2017

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1. Consumer Contacts to the Bureau of Consumer Services

The Pennsylvania Public Utility Commission’s Bureau of Consumer Services (BCS) prepared the annual assessment of the major utilities in the 2017 Utility Consumer Activities Report and Evaluation (UCARE). As in past years, this comprehensive report is developed using information collected from informal complaints received by the BCS for the electric, gas, water, and telephone industries. The report has been prepared to meet the statutory reporting requirement of 66 Pa. Code § 308(d) and to communicate to the public and the utility industry how jurisdictional utilities performed relative to informal complaint activity in 2017.

BCS began investigating and writing decisions on utility consumer complaints and service termination cases in April 1977. Since then, BCS has investigated 2,113,362 cases, which include consumer complaints and payment arrangement requests (PARs), and has received 1,676,777 opinions and requests for information (inquiries). In 2017, BCS received 139,375 contacts by consumers including 59,351 utility customer contacts that required investigation. It is important to note that BCS determined 88 percent of the 2017 customer complaints investigated and reviewed had been appropriately handled by the subject utilities before the customers brought them to the PUC.

Case Handling

The handling of utility complaint cases is the foundation for a number of BCS’s programs. The case-handling process provides an avenue through which consumers can obtain redress for errors and responses to inquiries. However, customers are required by Commission regulations to attempt to resolve problems directly with their utilities prior to filing a complaint or requesting a payment arrangement with the PUC. Although exceptions are permitted under extenuating circumstances, BCS generally handles those cases in which the utility and customer could not find a mutually satisfactory resolution to the problem.

Once a customer contacts the PUC with an informal complaint or PAR, BCS notifies the utility that a complaint or PAR has been filed. The utility sends all records concerning the complaint, including records of its contacts with the customer regarding the complaint to BCS. A BCS investigator reviews the records, interacts with both the complainant and utility as necessary, renders a decision and closes the case.

Consumer Feedback Survey

In order to monitor its own service to consumers, BCS uses a third party to survey a sampling of customers who have contacted BCS with a utility-related problem or PAR. The purpose of the survey is to collect information from the consumer’s perspective about the quality of the BCS complaint-handling service. The following table shows how consumers rate the service they received from BCS.

Consumer Rating of BCS Service

How would you rate the service you received from the PUC (BCS)?	2016	2017
Excellent	62%	56%
Good	18%	20%
Fair	11%	12%
Poor	9%	12%

According to the survey results, 76 percent of consumers who contacted BCS in 2017 rated the BCS's service as "excellent" or "good." Appendix A presents more information about how consumers rated the service they received from BCS in 2016 and 2017. BCS management frequently reviews the findings of the consumer feedback survey and promptly investigates any negative trends to improve staff performance and ultimately customer service.

Databases

To manage and use its complaint data effectively, BCS maintains a computer-based Consumer Services Information System (CSIS) through a contract with the Pennsylvania State University. This system enables BCS to aggregate and analyze the thousands of informal complaints that are reported to the Commission each year. In this way, BCS can address generic as well as individual problems. BCS policy analysts categorize a sampling of complaints into one of 36 specific problem categories. This case information is then transmitted to the CSIS database for analysis. The analysis from case information is used by BCS to generate reports to the Commission, utilities, legislators and the public. The reports present information regarding utility performance, industry trends, investigations, new policy issues and the impact of utility or Commission policy.

The majority of the data presented in this report is from CSIS. In addition, this report includes statistics from BCS's Collections Reporting System (CRS), Local Exchange Carrier Reporting System (LECRS) and Compliance Tracking System (CTS). Both the CRS (for electric and gas) and the LECRS (for telephone) provide valuable resources for measuring changes in company collection performance, including the number of residential service terminations, while CTS maintains data on the number and type of apparent infractions attributable to the major utilities.

Distinctions Among Cases

A number of cases were removed from the analyses that appear later in this report because the cases did not fairly represent company behavior. One treatment of the data involved the removal of complaints about problems over which the Commission has no jurisdiction, information requests that did not require investigation and most cases where the customers indicated that they had not contacted the company prior to contacting the Commission.

Commercial customer contacts were also excluded from the data used in the analysis. Although BCS's regulatory authority has largely been confined to residential accounts, the Bureau handled 968 cases from commercial customers in 2017. Of these cases, 189 were related to loss of utility service, while the remaining 779 were consumer complaints.

With respect to the 189 commercial cases, BCS cannot make payment arrangements for those accounts. Due to its limited jurisdiction over commercial cases, BCS does not issue decisions regarding commercial disputes. Instead, Bureau investigators give commercial customers information regarding the company position or attempt to mediate a mutually acceptable agreement regarding the disputed matter. Many such cases are referred to the Office of Administrative Law Judge's Mediation Unit for Alternative Dispute Resolution where an attempt is made to mediate a resolution between the utility and its customer.

The following table shows the vast majority of cases handled by BCS in 2017 involved residential utility service. Appendix B presents a comparison of the number of residential and commercial consumer complaints and PARs for 2016 and 2017.

Total Volume of Consumer Complaints and Payment Arrangement Requests (PARs) to BCS in 2017*

Industry	Consumer Complaints		Payment Arrangement Requests	
	Residential	Commercial**	Residential	Commercial**
Electric	8,038	424	29,942	128
Gas	2,126	127	12,399	44
Water	873	49	3,543	14
Telephone	1,398	179	60	3
Other***	1	0	3	0
Total	12,436	779	45,947	189

* This chart represents "investigated cases" only, and not those cases handled on the first call.

** All cases in 2017 that involved commercial accounts were deleted from the analyses in the subsequent chapters.

*** Sewer and steam heat complaints are designated as "other" in this table and the tables that follow.

Generally, customer contacts to BCS fall into three basic categories: consumer complaints, PARs and inquiries. Consumer complaints and PARs are taken in by BCS for further investigation, while inquiries are not. BCS classifies consumer complaints as contacts regarding disputes about utilities' actions related to billing, service delivery, repairs, etc. PARs are classified as contacts involving payment negotiations for unpaid utility service. Consumer complaints and PARs often are collectively referred to as informal complaints. Inquiries include information requests, opinions from consumers and informal complaints resolved on the initial call which do not require further investigation on the part of BCS.

Consumer Complaints

Most consumer complaints regarding the electric, gas, water, sewer and steam heat industries deal with matters covered under 52 Pa. Code, Chapter 56, Standards and Billing Practices for Residential Utility Service and/or Chapter 14 of the Public Utility Code, the Responsible Utility Customer Protection Act. For the telephone industry, most of the cases found in the consumer complaint category deal with matters covered by Chapter 30 of the Public Utility Code, Alternative Form of Regulation of Telecommunications Services, 52 Pa. Code, Chapter 64 Standards and Billing Practices for Residential Telephone Service and/or 52 Pa. Code, Chapter 63 Telephone Service. For the most part, consumer complaints represent those customers who

contacted the Commission due to the inability of the utility and the customer to reach a mutually satisfactory resolution to a dispute.

Consumer Complaints by Industry* 2016-17

Industry	2016	2017	% Change
Electric	6,295	8,462	34%
Gas	1,655	2,253	36%
Water	753	922	22%
Telephone	1,662	1,577	-5%
Other	3	1	-67%
Total	10,368	13,215	27%

* Table includes both residential and commercial consumer complaints.

Electric and gas utilities accounted for 64 percent and 17 percent, respectively, of all consumer complaints investigated by BCS in 2017. Water utilities accounted for 7 percent, while telephone utilities were the subject of 12 percent.

Justified Consumer Complaints

BCS investigators issue decisions regarding consumer complaint cases. BCS policy analysts review a sampling of the cases and utility records to determine if the utility took appropriate action when handling its customer contacts. This approach focuses strictly on the regulatory aspect of the complaint and evaluates utilities negatively only where, in the judgment of BCS, the utility did not follow appropriate complaint-handling procedures or properly apply regulations. Specifically, a case is considered “justified” in the appeal to BCS if it is found that, prior to BCS intervention, the company did not comply with Commission Orders, regulations, reports, Secretarial Letters, tariffs, etc.

Classification of Consumer Complaints

BCS has categorized the 2017 residential complaints into 14 categories for each of the electric, gas and water utilities and into 11 categories for each of the telephone utilities. The tables that show the percent of complaints in each category in 2017 appear in each industry chapter. The percentages shown in the tables are for all of the cases that residential consumers filed with BCS that were evaluated, not just the cases that are determined to be justified in coming to BCS. BCS analyzes the categories that generate complaints or problems for customers, even if the utility records indicate that the utility followed Commission procedures and guidelines in handling the complaint. BCS often discusses its findings with individual utilities so they can use the information to review their complaint-handling procedures in categories that seem to produce large numbers of consumer complaints to the Commission. The four tables in Appendix E show the actual number of cases in each category in 2017.

Payment Arrangement Requests

PARs principally include contacts to BCS involving requests for payment terms in one of the following situations:

- Suspension/termination of service is pending;
- Service has been terminated and the customer needs payment terms to have service restored; or
- The customer wants to eliminate a debt or a past-due balance.

All of the measures pertaining to PARs are based on assessments of contacts to BCS from individual customers. As with consumer complaints, almost all customers had already contacted the utility prior to contacting BCS. During 2017, BCS handled 46,136 PARs from customers of the utilities under the Commission's jurisdiction.

Act 201 of 2004 amended Title 66 of the Public Utility Code by adding Chapter 14, the Responsible Utility Customer Protection Act, which changed the rules for terminations, reconnections and PARs. On June 9, 2011, the Commission adopted a final rulemaking order incorporating Chapter 14 into Chapter 56 of its regulations. The Independent Regulatory Review Commission (IRRC) approved these regulations on July 21, 2011. The revised Chapter 56 regulations have been in effect since Oct. 8, 2011. The law sets forth limits within which the Commission can establish payment arrangements between a public utility, customers and applicants. In addition to establishing the length of payment arrangements, Chapter 14 prohibits the Commission from establishing a second or subsequent payment arrangement, absent a decrease in income, if a customer has defaulted on a previous payment arrangement. Chapter 14 also prohibits the Commission from issuing payment arrangements involving customer assistance program arrearages.

On Oct. 22, 2014, Governor Corbett signed House Bill 939, also known as Act 155 of 2014, which among other things, reauthorized Chapter 14 for another ten years. In addition to reauthorizing Chapter 14, the General Assembly revised the law in a number of areas, including:

- Expanding the scope of the law to cover small gas companies, steam heating and wastewater utilities.
- Prohibiting termination of utility service on Fridays.
- Allowing physician assistants, along with physicians and nurse practitioners, to file medical certificates.
- Allowing all customers and applicants to pay security deposits in installments over 90 days. CAP-eligible customers are exempt from security deposit requirements.
- New utility reporting requirements concerning the use of medical certificates and high-arrearage accounts.
- A five-year PUC reporting requirement (due in December of years 2019 and 2024) on the implementation and impact of Chapter 14.

The re-authorized law went into effect in December 2014. The Commission strives to balance the needs of both consumers and utilities when implementing the new law and will provide all interested parties with opportunities to participate in the process. On July 21, 2016, the Commission proposed revisions to 52

Pa. Code Chapter 56, including sections that have been superseded by the reauthorized Chapter 14. Commission staff will be reviewing the comments and preparing new regulations for a future Final Order (Docket L-2015-2508421). The Commission appreciates the opportunity to continually evaluate its regulations regarding Chapter 14 so that the goals of increasing utility account collections and eliminating the subsidization of bad debt costs by paying customers do not erode consumer protections.

In 2017, the overall volume of PARs handled by the Commission decreased by 13 percent from the previous year. PARs decreased for all industries since 2016, electric by 14 percent, gas by 10 percent, water by 9 percent and telephone by 26 percent.

Payment Arrangement Requests (PARs) by Industry* **2016-17**

Industry	2016	2017	% Change
Electric	35,049	30,070	-14%
Gas	13,869	12,443	-10%
Water	3,890	3,557	-9%
Telephone	85	63	-26%
Other	5	3	-40%
Total	52,898	46,136	-13%

* Table includes both residential and commercial PARs. Please note: All consumer contacts requesting a payment arrangement are taken in and classified as a PAR. However, not all customers are eligible to receive a PAR.

As in past years, the majority of requests for payment arrangements in 2017 involved electric or gas companies. Of the PARs, 65 percent (30,070 cases) were from electric customers, and 27 percent (12,443 cases) were from gas customers. Also, 8 percent of PARs (3,557 cases) came from customers of various water utilities. Less than 1 percent of PARs (63 cases) came from telephone customers.

Inquiries and Opinions

During 2017, BCS received 25,610 customer contacts that, for the most part, required no follow-up investigation beyond the initial contact. While these are actually informal complaints, BCS currently classifies these contacts as “inquiries” for the purpose of storing them in its complaint information system. The inquiries for 2017 include contacts to the BCS Utility Customer Hotline, as well as contacts to BCS using mail service and email communication.

In large part, the contacts in 2017 related to the customer assistance programs. BCS also classifies certain PARs as inquiries. For example, BCS does not issue payment decisions on requests to restore or avoid suspension/termination of toll or non-basic telephone service. When consumers call with these problems, BCS classifies these requests as inquiries. Similarly, if a customer has recently been through the BCS payment arrangement process and calls again with a new request regarding the same account without experiencing a situation that would qualify that customer for a subsequent payment arrangement, BCS does not open a new PAR case. In these instances, BCS classifies the customer’s contact as an inquiry.

As in past years, BCS also has shifted some contacts that originated as consumer complaints and PARs into the inquiry category because it was not appropriate to count these contacts as informal complaints. Examples include complaints that were found to be duplicates, informal complaints filed against the wrong company, informal complaints that BCS handled in spite of the fact that customers had not previously contacted their companies about their problems and cases that the investigators verbally dismissed. These 837 cases accounted for 3 percent of inquiries in 2017.

BCS is able to expand its list of 78 reasons for contact as consumer reasons grow and change. Possible actions by BCS intake staff include: recording the consumer's opinion; giving information to the consumer; referring the consumer to a utility company; and referring the consumer to an agency or organization outside of the Commission. If the contact requires further action, the intake staff refers the contact to a BCS investigator, and the contact becomes a consumer complaint or a PAR. The following table shows the various reasons for contact for the 2017 inquiries.

Categories of 2017 Inquiries

Reason for Contact	Number	Percent
CAP inquiry/contact	6,638	26%
Unable to open new PAR – service on	5,011	20%
Termination or suspension of service	3,510	14%
Request for general information	1,999	8%
Competition issues and requests for information	1,632	6%
PUC has no jurisdiction	1,606	6%
Billing dispute	1,097	4%
Rate protest	943	4%
Applicant/deposit issue	516	2%
People-delivered company service	374	1%
Service (company facilities)	267	1%
Unable to open new PAR – service off	178	1%
Weather outage	23	<1%
Rate complaint	19	<1%
Cramming*	5	<1%
Slamming*	1	<1%
Other miscellaneous reasons	1,384	5%
Reason for contact is not available	407	2%
Total	25,610	100%

* Please refer to the Glossary of Terms at the end of the Telephone industry chapter.

Residential Consumer Complaints Not Included in Industry Chapters

Traditionally, the primary focus of BCS's review of utilities' complaint handling has been on the performance of the major electric, gas, water and telephone utilities. However, for the past several years, BCS has included a limited amount of complaint information for the non-major utilities and the other service providers in the UCARE report. In 2017, BCS experienced an increase in the overall number of residential consumer complaints for the non-major utilities. Consumer complaints increased over the year in the electric, gas, water and telephone industries. This section presents information about the residential consumer complaints that are not included in the industry chapters that follow.

In 2017, BCS staff investigated consumer complaints about a variety of problems that consumers were having with the non-major companies under the Commission's jurisdiction. The vast majority of complaints not included in the industry chapters involved slamming.

The next-highest volume of complaints coming from residential customers of the non-major electric, gas, water and telephone companies involved billing disputes. Those two types of complaints accounted for 70 percent of the residential consumer complaints about the non-major companies in the electric industry; 56 percent of residential consumer complaints about the non-major gas companies; 45 percent of the residential consumer complaints about the non-major water companies; and 18 percent of the complaints about the non-major telecommunications companies.

Appendix C presents a summary of the residential informal complaints (consumer complaints and PARs) that are not included in the electric, gas, water and telephone chapters that follow. The table lists the non-major companies for these industries, the electric generation suppliers and natural gas suppliers and other providers of telecommunications services having five or more residential consumer complaints in 2017.

Calls to the Commission about Electric and Gas Competition

In 2017, the Commission's call center employees used BCS's information system to record information from the consumer contacts about electric and gas competition. Statistics show that 93 percent of contacts about electric and gas competition are related to the electric industry, while 7 percent concern the gas industry. Call center employees recorded information from 3,864 consumer contacts about competition in the energy industries. Many calls came from consumers who called about various issues associated with customer choice in the electric and gas industries. Most frequently, consumers called about slamming and competition bill disputes (24 and 18 percent of calls, respectively).

In most instances, BCS classified these contacts as inquiries because they required no investigation or follow-up. However, some consumer contacts required further investigation and possibly action to resolve the consumer's concerns. In these cases, BCS classified the contact as a consumer complaint and investigated the consumer's issue. In 2017, slamming complaints produced the largest volume of competition-related consumer complaints. Appendix D-1 explains the types of competition complaints BCS handles.

In prior years, BCS investigated a number of consumer complaints in which consumers alleged they were assigned to an electric or gas supplier without their consent or knowledge (slamming). In 2017, BCS received 742 allegations of electric slamming and 42 allegations of slamming in the gas industry. There were three allegations of slamming in the telephone industry. With respect to slamming, the Commission has stated

clearly, it “...will have zero tolerance for slamming by any means and in any form.”¹ The Commission views customer slamming as among the most serious violations of consumer regulations. Of the 787 slamming complaints received by BCS, 748 were filed by residential customers.

During the early phases of electric and gas competition, BCS expected it would receive consumer complaints associated with the transition to customer choice. As expected, many customers experienced a variety of problems as they began choosing electric and gas suppliers. BCS found that, after investigating these complaints, it was often difficult to determine who was at fault in causing the complaint. Thus, BCS decided that it would be unfair to include competition complaints with consumer complaints about other issues when it calculates the performance measures it uses to evaluate and compare companies within the electric and gas industries. BCS continued this practice in 2017. Therefore, BCS excluded 2,163 competition-related complaints from the data set used to prepare the tables in the electric industry chapter and 153 such complaints in the gas industry chapter.

Informal Compliance Process and Infractions

BCS’s informal compliance process remains its primary compliance effort. This process gives each utility specific examples of apparent infractions of Chapters 14, 30, 56, 63 and 64. The informal compliance process uses consumer complaints to identify, document and notify utilities of apparent deficiencies. The utilities can use the information to pinpoint and voluntarily correct deficiencies in their customer-service operations. The process begins by BCS notifying a utility of an alleged infraction. A utility that receives notification of an allegation has an opportunity to respond. If the information about the allegation is accurate, BCS expects the utility to take action to correct the problem or address any deficiencies that led to the infraction. Corrective actions may entail: modifying a computer program; revising company procedures or the text of a notice, bill or letter; or providing additional staff training to ensure the proper use of a procedure.

If the utility states the information is inaccurate, it needs to provide specific details and supporting data to disprove the allegation. BCS always provides a final determination to the utility regarding the alleged infraction. For example, if the utility provides supporting data indicating that the information about the allegation is inaccurate, BCS, after reviewing all the information, informs the utility that, in this instance, the facts do not reflect an infraction of the regulations. On the other hand, if the company agrees the information forming the basis of the allegation is accurate, or if BCS does not find that the data supports the utility’s position that the information is inaccurate, BCS informs the company that the facts reflect an infraction of a particular section of the regulations. The notification process allows utilities to receive written clarifications of Chapters 14, 30, 56, 63 or 64 provisions and the policies of the Commission and BCS.

The significance of apparent infractions identified by the informal compliance process is frequently emphasized by the fact that some represent systemic errors that are widespread and affect many utility customers. Since BCS receives only a small portion of the complaints that customers have with their utility companies, limited opportunities exist to identify such errors. Therefore, the informal compliance process is specifically designed to help utilities identify systemic errors. One example of a systemic error is a termination notice with text that does not comply with the requirements of Chapter 56. Each recipient of the notice is affected by that error. When such an error is discovered, BCS encourages utilities to investigate the scope of the problem and take corrective action. Some utilities have developed their own information systems to identify problems by reviewing complaints before they come to the Commission’s attention. BCS encourages utilities to continue this activity and share their findings with Bureau staff.

¹ L-00970121, Public Meeting of May 21, 1998.

2. Performance Measures

For the most part, BCS uses complaints it receives from customers of the major electric, gas, water and telephone utilities to assess utilities' complaint-handling performance. In nearly every case, the customer had already contacted the company about the problem prior to contacting BCS. BCS reviews the utility's record as to how the utility handled the complaint when the customer contacted the company. The review includes several classifications and assessments that form the basis of all the performance measures presented in this and the next four chapters, with the exception of the number of terminations and termination rate. The termination statistics for the electric, gas and water companies are drawn from reports required by Chapter 56 at §56.231(a)(14), while telephone termination statistics are drawn from reports required by Chapter 64 at §64.201(7). The sections that follow explain the various measures BCS employs to assess utility performance.

Consumer Complaint Rate

The calculation of the consumer complaint rate (consumer complaints per 1,000 residential customers) permits the reader to make comparisons among utilities of various sizes. BCS has found that high consumer complaint rates and extreme changes in consumer complaint rates from one year to the next are often indicative of patterns and trends that it should investigate. However, since many of the complaints in the consumer complaint rates are not "justified," BCS considers the "justified consumer complaint rate" (justified consumer complaints per 1,000 residential customers) to be a clearer indication of a utility's complaint handling performance.

Justified Consumer Complaint Rate

BCS uses case evaluation to identify whether correct procedures were followed by the utility in responding to the customer's complaint prior to the intervention of BCS. Case evaluation is used to determine whether a case is "justified." A customer's case is considered "justified" if it is found that, prior to BCS intervention, the company did not comply with Commission Orders, policies, regulations, reports, Secretarial Letters or tariffs in reaching its final position. In the judgment of BCS, a case that is "justified" is a clear indication that the company did not handle a dispute properly or effectively, or, in handling the dispute, the company violated a rule, regulation or law.

The performance measure called "justified consumer complaint rate" reflects both volume of complaints and percent of consumer complaints found justified. The justified consumer complaint rate is the number of justified consumer complaints per 1,000 residential customers. By using this ratio, the reader can use the "justified" rate to compare utilities' performance within an industry and over time. BCS perceives the justified consumer complaint rate to be the bottom-line measure of performance that evaluates how effectively a company handles complaints from its customers.

BCS monitors the complaint rates and justified rates of the major utilities, paying particular attention to the number of justified complaints that customers file with the Commission. Justified complaints may indicate areas where BCS should discuss complaint-handling procedures with a utility so that its customers receive fair and equitable treatment when they contact the utility. When BCS encounters company case-handling performance (justified consumer complaint rate) that is significantly worse than average, there is reason to suspect that many customers who contact the utility are at risk of improper dispute handling by the utility. As part of the monitoring process, BCS compares the "justified" rates of individual utilities and industries over time and investigates significant changes when they occur. In the chapters that follow, BCS

compares the consumer complaint rates and the justified consumer complaint rates of the major utilities within the electric, gas, water and telephone industries.

Response Time to Consumer Complaints

Once a customer contacts BCS with a complaint about a utility, the utility is notified. The utility then sends BCS its records of its contact with the customer regarding the complaint. Response time is the time span in days from the date of BCS's first contact with the utility regarding a complaint to the date on which the utility provides BCS with its report regarding the complaint. Response time quantifies the speed of a utility's response to BCS' informal complaints. In the following chapters, response time is presented as the average number of days that each utility took to supply BCS with its utility reports in response to consumer complaints.

Payment Arrangement Request Rate

BCS normally intervenes at the customer's request only after direct payment negotiations between the customer and the company have failed. The volume of PARs from a utility's customers may fluctuate from year to year, or even from month to month, depending upon the utility's collection strategy as well as economic factors. The calculation of the PAR rate (PARs per 1,000 residential customers) permits the reader to make comparisons among utilities with differing numbers of residential customers. Nevertheless, unusually high or low rates and sizable changes in rates from one year to the next may reflect changes in company policies or bill collection philosophies, or they may be indicative of problems. BCS views such variations as potential areas for investigation.

Justified Payment Arrangement Request Rate

Just as with consumer complaints, once a customer contacts BCS with a PAR, BCS notifies the utility. The company sends a report to BCS that details the customer's payments, usage and payment negotiation history. Many of these cases are "straight" PARs, without any other issue or complaint against the company. Those cases are processed in an automated fashion and are not evaluated in the justified rate. In cases where the utility claims ineligibility for a PUC payment plan or where there are complaints or claims in addition to the PAR, a BCS investigator considers the customer's record and makes a decision regarding the issues and amount owed and notifies the company and the customer of the decision. BCS policy analysts review a sampling of these case records to determine if the utility negotiated properly with the customer and uses this record to determine the outcome of the case. This approach evaluates companies negatively only when BCS finds appropriate payment negotiation procedures were not followed, or where the regulations have been misapplied. Specifically, a case is considered "justified" in the appeal to BCS if it is found that, prior to BCS intervention, the company did not comply with Commission regulations, reports, Secretarial Letters, tariffs or guidelines.

Changes in company policy can influence not only the volume of PARs to the Commission but also the effectiveness of a utility's payment negotiations. BCS uses the "justified PAR rate" to measure a utility's performance in handling PARs from customers. The justified PAR rate is the ratio of the number of justified PARs per 1,000 residential customers. BCS monitors the justified PAR rates of the major utilities. For example, BCS compares the "justified" rates of individual utilities and industries over time and investigates significant changes when they occur. In the chapters that follow, BCS compares the PAR rates and the justified PAR rates of the major utilities within the electric, gas, water and telephone industries. Because BCS receives a very large volume of requests for payment terms, it reviews a random sample of cases for the companies with the

largest number of PARs. For these companies, the justified PAR rate and response time are based on a statistically valid subset of the cases that came to BCS.

Response Time to Payment Arrangement Requests

Once a customer contacts BCS for a PAR, BCS notifies the utility. The utility then sends BCS records that include the customer's payment history, the amount owed, prior payment arrangements and the results of the most recent payment negotiation with the customer. Response time is the number of days from the date BCS first contacts the utility regarding a PAR to the date on which the utility provides BCS with its utility report. Response time quantifies the speed of a utility's response to BCS PARs. In the following chapters, response time is presented as the average number of days that each utility took to supply BCS with its utility reports.

BCS calculates response time for the major electric, gas and water companies using only their responses to PARs from customers whose service has been terminated, who have a dispute with the company, or who have previously had a BCS payment arrangement for the amount that they owe.

However, response time to PARs for the telephone companies is the average number of days that each telephone company took to supply BCS with a utility report for all categories of PARs.

Infraction Rate

During 2017, BCS continued its informal compliance notification process to improve utility compliance with applicable statutes and regulations relating to the treatment of residential accounts. To compare utilities of various sizes within an industry, BCS has calculated a measure called the infraction rate. The infraction rate is the number of informally verified infractions for each 1,000 residential customers.

Several considerations are important to keep in mind when viewing the infraction rate charts in the chapters that follow. First, the data does not consider the causes of the individual infractions. Second, some infractions may be more serious than others because of their systemic nature, and therefore may show ongoing or repetitive occurrences. Still other infractions may be more serious because they involve threats to the health and safety of utility customers.

The value of the infraction rate is to depict industry trends over time. The trend for 2017 is calculated using BCS's Compliance Tracking System (CTS) data as of Sept. 7, 2018. The 2017 trends may change if the total number of infractions increases or decreases upon review by BCS. This would occur if new infractions are discovered from customer complaints that originated in 2017 but were still under investigation by BCS when the data was retrieved from CTS. Often, the total number of infractions for the year will change from the number cited in this report. BCS will update the 2017 infraction rate in the report on 2018 complaint activity. Infraction rates for each major electric, gas, water and telephone utility company are shown for 2015, 2016 and 2017 in upcoming chapters. Appendix H shows detailed information about the infractions BCS gleaned from its review of the 2017 consumer complaints and PARs. The information presented in Appendix H shows the infractions of Chapter 56, Chapter 14 and other regulations for the major electric, gas and water companies, and the infractions of Chapters 30, 63, 64 and other regulations for the major telephone companies.

Termination Rate

Payment over time through a mutually acceptable payment arrangement is one possible outcome when a customer owes an outstanding balance to a utility company. Termination of the utility service is another. BCS views termination of utility service as a utility's last resort when customers fail to meet their payment obligations. The calculation of the termination rate allows the reader to compare the termination activity of utilities with differing numbers of residential customers. For the electric, gas and water industries, the termination rate is the number of service terminations divided by the number of residential customers. For the telephone industry, the termination rate is the number of terminations for each 1,000 residential customers. Any significant increase in the termination rate would indicate a trend or pattern the Commission may need to investigate.

BCS Performance Measures and Industry Chapters

The tables in the following chapters present the data alphabetically by company name. Each chapter includes tables that show the consumer complaint rate and the justified consumer complaint rate of each major utility. Also included in the industry chapters are tables that show the prior year's justified consumer complaint rates and justified PAR rates for each of the major utilities. The tables also reflect the average rates of the major utilities within the industry for each of these measures. In addition, each industry chapter presents tables that show infraction rates, response times to consumer complaints and PARs, and the termination rates for the major utilities. In the telephone industry chapter, data regarding Chapter 30 Broadband is being presented for the first time.

It is important to note that the electric and gas industry chapters present only data from those utilities that have more than 100,000 residential customers. In the water industry chapter, the individual statistics for the Class A water utilities that have fewer than 100,000 residential customers ("Other Class A") are being presented; however, the "Other Class A" rates continue to be presented as a whole and the Class A Averages are presented based on the individual rates of the water utilities that have more than 100,000 residential customers and the "Other Class A" companies as a whole. The telephone chapter presents data from those local service providers serving more than 50,000 residential customers.

BCS has found the inclusion of statistics for the smaller utilities can skew the average of industry statistics in ways that do not fairly represent industry performance. For this reason, BCS excluded the statistics involving UGI-Electric when it calculated the 2016 and 2017 averages for the electric industry. Similar to previous years, statistics for UGI-Electric are included in the appendices of this report.

Universal Service and Energy Conservation Programs

The Commission has a long history of involvement in universal service and energy conservation programs that help utility consumers obtain and keep service, and conserve energy. At the end of the water and telephone chapters that follow, readers will find highlights of the water and telephone programs that the Commission has supported and encouraged, not only in 2017, but in prior years as well.

BCS monitors and evaluates the universal service and energy conservation programs of the electric and gas companies. The goal in monitoring these programs is to help the Commission fulfill its oversight responsibilities by increasing the effectiveness of utility collections while protecting the public's health and safety.

The electric and gas programs include: Customer Assistance Programs; the Low-Income Usage Reduction Programs; Utility Hardship Fund Programs; Customer Assistance and Referral Evaluation Services programs; and other programs to assist low-income customers. BCS's reporting on these programs is no longer included in this report.

In November 2018, the Commission released the 18th annual report on Universal Service Programs and Collections Performance. BCS prepared the report, which presents 2017 universal service and collections data for the major electric and natural gas distribution companies. The report is available on the Commission's website at: http://www.puc.pa.gov/General/publications_reports/pdf/EDC_NGDC_UniServ_Rpt2017.pdf

3. Electric Industry

In 2017, the Commission had jurisdiction over 15 electric distribution companies (EDCs). However, the majority of the consumer complaints and PARs involving the electric industry were from residential customers of the seven major EDCs: Duquesne Light Co. (Duquesne), PECO Energy Co. (PECO), PPL Electric Utilities Inc. (PPL) and the four FirstEnergy companies – Metropolitan Edison Co. (Met-Ed), Pennsylvania Electric Co. (Penelec), Pennsylvania Power Co. (Penn Power) and West Penn Power Co. (West Penn). This chapter will focus exclusively on those seven companies.

Most of the complaints and PARs dealt with matters covered under Chapter 56 of our regulations or Chapter 14 of the Public Utility Code. Generally, consumer complaints and PARs represent customer appeals to the Commission resulting from the inability of the company and the customer to reach a mutually satisfactory resolution to a dispute or payment negotiation.

The statistics in the tables on the pages that follow depict the performance of each of the seven major electric utilities in 2017. The tables in the appendices also include UGI-Electric, a major EDC with fewer than 100,000 residential customers. PECO’s statistics include data for both electric and gas service. BCS investigated complaints in 2017, generated as a result of the electric choice program, which allows customers to choose an electric generation supplier (EGS). However, as mentioned in the first chapter, BCS removed these complaints from the data it used to prepare the tables on consumer complaints and PARs. Appendices F and G present 2016 and 2017 statistics on the performance of the seven largest EDCs, as well as UGI-Electric.

Consumer Complaints

During 2017, BCS handled 6,454 consumer complaints from residential customers of the various EDCs and 1,584 consumer complaints from residential customers of EGSs. Of these residential complaints, 80 percent (6,405) were from customers of the seven largest EDCs. For the analyses in this chapter, BCS excluded a total of 296 consumer complaints about the major EDCs that involved competition issues.

Consumer Complaint Categories

The following table shows the percentage of 2017 complaints from residential customers of the seven largest EDCs in each of the 14 categories used by BCS policy analysts. Appendix E, Table 1, provides the actual number of cases that fell into each category in 2017.

Consumer Complaint Categories: 2017 Major Electric Distribution Companies

Categories	Duquesne	Met-Ed**	PECO+**	Penelec**	Penn Power	PPL**	West Penn**	Electric Average
Billing Disputes	22%	20%	20%	22%	24%	21%	18%	21%
Termination or PAR Procedures	17%	14%	23%	12%	11%	25%	9%	16%
Personnel Problems	17%	11%	16%	12%	14%	13%	13%	14%
Credit and Deposits	7%	14%	14%	13%	20%	3%	9%	11%
Metering	8%	17%	2%	15%	3%	7%	15%	10%
Other Payment Issues	9%	4%	9%	5%	6%	9%	5%	7%
Discontinuance/Transfer	10%	5%	6%	4%	7%	9%	4%	6%
Service Interruptions	5%	4%	1%	6%	5%	2%	9%	5%
Damages	1%	3%	3%	4%	4%	4%	8%	4%
Service Quality	2%	3%	3%	2%	2%	3%	5%	3%
Scheduling Delays	<1%	2%	1%	2%	1%	1%	2%	1%
Service Extensions	<1%	1%	<1%	<1%	2%	1%	2%	1%
Rates	0%	1%	0%	2%	1%	1%	1%	1%
All Other Problems	2%	1%	2%	1%	1%	1%	1%	1%
Total-Number*	413	447	435	451	187	440	453	2,826

*Based on residential complaints opened in 2017 and evaluated by BCS as of June 8, 2018.

**Based on a probability sample of cases.

+PECO statistics include electric and gas.

- Categories are for all residential complaints filed with BCS that were evaluated, whether or not they were found to be justified. See Appendix D-1 for an explanation of complaint categories and Appendix E, Table 1, for the number of cases in each category.
- In 2017, billing disputes accounted for 21 percent, termination or PAR procedures accounted for 16 percent and personnel problems accounted for 14 percent of the consumer complaints for the major EDCs. These three categories accounted for 51 percent of consumer complaints about the major EDCs.

**2017 Residential Consumer Complaint Rates/
Justified Consumer Complaint Rates
Major Electric Distribution Companies**

Company	Consumer Complaint Rate	Justified Consumer Complaint Rate
Duquesne	1.10	0.08
Met-Ed	2.19	0.26*
PECO+	0.88	0.05*
Penelec	2.02	0.26*
Penn Power	1.59	0.18
PPL	0.86	0.07*
West Penn	1.79	0.20*
Average	1.49	0.16

* Justified consumer complaint rate based on a probability sample of cases.

+ PECO statistics include electric and gas.

- The consumer complaint rate equals the number of consumer complaints for each 1,000 residential customers. The justified consumer complaint rate equals the number of justified consumer complaints for each 1,000 residential customers.
- For the major EDCs, the average of the consumer complaint rates was over nine times greater than the average of the justified consumer complaint rates.
- Appendix F, Table 1, presents the number of consumer complaints, the consumer complaint rate, the number of justified consumer complaints and the justified consumer complaint rate for each major EDC in 2016 and 2017.

**2016-17 Justified Residential
Consumer Complaint Rates
Major Electric Distribution Companies**

Company	2016	2017
Duquesne	0.09	0.08
Met-Ed*	0.17	0.26
PECO*+	0.05	0.05
Penelec*	0.15	0.26
Penn Power	0.22	0.18
PPL*	0.04	0.07
West Penn*	0.15	0.20
Average	0.13	0.16

* Based on a probability sample of cases.

+ PECO statistics include electric and gas.

- The justified consumer complaint rate equals the number of justified consumer complaints for each 1,000 residential customers.
- The average of the justified consumer complaint rates for the major electric distribution companies increased from 0.13 in 2016 to 0.16 in 2017. Of the seven major EDCs, four had justified consumer complaint rates that were higher than the industry average.
- The justified consumer complaint rates for Met-Ed, Penelec, PPL and West Penn increased from 2016 to 2017, while the rates for Duquesne and Penn Power decreased and the rate for PECO remained stable.
- Appendix F, Table 1, presents the number of consumer complaints, the consumer complaint rate, the number of justified consumer complaints and the justified consumer complaint rate for each major EDC in 2016 and 2017.

**2016-17 Response Time to BCS
Residential Consumer Complaints
Major Electric Distribution Companies**

Company	Number of Days 2016	Number of Days 2017	Change in Days 2016 to 2017
Duquesne	20.7	10.2	-10.5
Met-Ed	17.7	15.9	-1.8
PECO+	13.9	16.1	2.2
Penelec	17.2	16.5	-0.7
Penn Power	14.7	14.7	0.0
PPL	12.0	14.6	2.6
West Penn	17.7	16.2	-1.5
Average	16.3	14.9	-1.4

+ PECO statistics include electric and gas.

- The calculation for average response time includes all residential consumer complaints for the major electric companies.
- Overall, the average response time decreased by 1.4 days, from 16.3 days in 2016 to 14.9 days in 2017.
- Duquesne had the shortest consumer complaint response time in 2017 at 10.2 days, while Penelec had the longest at 16.5 days. Duquesne had the greatest decrease, 10.5 days, in consumer complaint response time from 2016 to 2017.

Payment Arrangement Requests

In 2017, BCS handled 29,759 PARs from residential customers of the EDCs. There were 183 PARs from residential customers of Pennsylvania's EGSs. Of the residential PARs, 98 percent (29,402) were from customers of the seven largest EDCs. In 2017, BCS reviewed a representative sample of the PARs for the seven largest EDCs. Thus, the calculation for justified PAR rate that appears in the pages that follow is based on a subset of cases that BCS received from the customers of these utilities. BCS believes that the size of the samples gives a reasonable indication of the performance of these companies. Appendix G, Table 1, provides additional statistics regarding the PARs from residential customers of the major EDCs.

**2017 Residential Payment Arrangement Request (PAR) Rates/
Justified PAR Rates*
Major Electric Distribution Companies**

Company	PAR Rate	Justified PAR Rate
Duquesne	3.35	0.23
Met-Ed	7.42	1.00
PECO+	3.94	0.41
Penelec	8.06	0.89
Penn Power	8.10	0.91
PPL	7.72	0.94
West Penn	5.48	0.37
Average	6.30	0.68

* All companies have justified PAR rates based on a probability sample of cases.

+ PECO statistics include electric and gas.

- The PAR rate equals the number of PARs for each 1,000 residential customers. The justified PAR rate equals the number of justified PARs for each 1,000 residential customers.
- On average, there were more than six PARs to BCS for each 1,000 residential customers of the major EDCs in 2017. There was less than one justified PAR for each 1,000 residential customers.
- Appendix G, Table 1, presents the number of PARs, the PAR rate, the number of justified PARs and the justified PAR rate for each major EDC in 2016 and 2017.

**2016-17 Justified Residential
Payment Arrangement Request (PAR) Rates*
Major Electric Distribution Companies**

Company	2016	2017
Duquesne	0.23	0.23
Met-Ed	1.01	1.00
PECO+	0.28	0.41
Penelec	0.91	0.89
Penn Power	0.98	0.91
PPL	0.67	0.94
West Penn	0.33	0.37
Average	0.63	0.68

* All companies have justified PAR rates based on a probability sample of cases.

+ PECO statistics include electric and gas.

- The justified PAR rate equals the number of justified PARs for each 1,000 residential customers.
- The average of the justified PAR rates for the seven major EDCs increased from 0.63 in 2016 to 0.68 in 2017.
- The justified PAR rates increased for three of the seven major EDCs from 2016 to 2017. Four of the major EDCs had justified PAR rates greater than the 2017 industry average while three of the major EDCs had justified PAR rates below the industry average.
- Appendix G, Table 1, presents the number of PARs, the PAR rate, the number of justified PARs and the justified PAR rate for each major EDC in 2016 and 2017.

**2016-17 Response Time to BCS
Residential Payment Arrangement Requests (PARs)
Major Electric Distribution Companies**

Company	Number of Days 2016	Number of Days 2017	Change in Days 2016 to 2017
Duquesne	15.7	5.7	-10.0
Met-Ed	12.5	11.6	-0.9
PECO+	4.9	5.5	0.6
Penelec	13.1	12.0	-1.1
Penn Power	13.0	12.4	-0.6
PPL	7.5	7.2	-0.3
West Penn	14.6	12.6	-2.0
Average	11.6	9.6	-2.0

+ PECO statistics include electric and gas.

- The calculation for average response time includes PARs from customers of the major electric companies whose service has been terminated, who have a dispute with the company, or who have previously had a BCS payment arrangement for the amount that they owe.
- The average response time for the seven major EDCs decreased by 2.0 days. The average response time went from 11.6 days in 2016 to 9.6 days in 2017.
- There was a wide range of PAR response times among the major EDCs in 2017, from a low of 5.5 days for PECO to a high of 12.6 days for West Penn.

Termination and Reconnection of Service

Each month, the electric companies report to the Commission the number of residential accounts that they terminated for non-payment during the previous month. They also report the number of previously terminated residential accounts that they reconnected during the month. Some EDCs maintain a fairly consistent pattern of termination behavior, while others fluctuate from year to year. The number of reconnections varies from year to year and from company to company, depending on a variety of factors. The EDC reconnects a customer's terminated service when a customer either pays their debt in full or makes a significant payment on the debt and agrees to a payment arrangement for the balance owed to the company. The following tables indicate the annual number of residential accounts each of the seven largest EDCs terminated and reconnected in 2015, 2016 and 2017. The first table also presents the termination rates for each of these companies.

Residential Service Terminations/Termination Rates Major Electric Distribution Companies

Company	Residential Service Terminations				Termination Rates		
	2015	2016	2017	% Change 2016-17	2015	2016	2017
Duquesne	16,601	12,726	21,777	71%	3.16	2.42	4.09
Met-Ed	25,136	25,276	23,870	-6%	5.10	5.10	4.78
PECO+	87,144	85,937	90,145	5%	5.99	5.86	6.10
Penelec	21,579	22,121	21,096	-5%	4.30	4.41	4.21
Penn Power	4,951	4,651	4,360	-6%	3.47	3.24	3.02
PPL	52,229	40,849	42,216	3%	4.26	3.32	3.45
West Penn	12,551	14,878	14,234	4%	2.02	2.38	2.28
Total	220,191	206,438	217,698	5%			
Average of Rates					4.04	3.82	4.35

+ PECO statistics include electric and gas.

- The termination rate is the number of service terminations divided by the number of residential customers, expressed as a percent.
- Overall, the seven major EDCs terminated 5 percent more residential accounts in 2017 than in 2016.

Residential Service Reconnections Major Electric Distribution Companies

Company	2015	2016	2017	% Change 2016-17
Duquesne	10,578	8,710	14,961	72%
Met-Ed	20,503	20,811	19,554	-6%
PECO+	67,000	70,228	74,421	6%
Penelec	16,506	16,942	15,919	-6%
Penn Power	4,880	4,201	3,415	-19%
PPL	39,083	30,669	31,280	2%
West Penn	9,732	11,744	10,783	-8%
Total	168,282	163,305	170,333	4%

+ PECO statistics include electric and gas.

- Overall, the seven major EDCs reconnected 4 percent more residential accounts in 2017 than in 2016.

Compliance

BCS provides utilities with written clarifications or explanations of Chapter 56 provisions and other Commission regulations and policies. The use of “infraction rate” is intended to help the Commission monitor the duty of electric companies at 66 Pa. C.S. §2807(d) to, at a minimum, maintain customer services under retail competition at the same level of quality as existed prior to the beginning of the Electricity Generation Customer Choice and Competition Act of 1996.

The infraction rates in the table that follows are based on informal complaints that residential consumers filed with BCS from 2015 through 2017. Infractions identified on complaints involving competition issues are included in the infraction statistics. Appendix H, Table 1, presents detailed information about the infractions identified in 2017 cases to the BCS.

Commission Infraction Rates Major Electric Distribution Companies

Company	2015	2016	2017
Duquesne	0.27	0.11	0.09
Met-Ed	0.19	0.13	0.11
PECO+	0.04	0.06	0.01
Penelec	0.15	0.07	0.12
Penn Power	0.28	0.17	0.12
PPL	0.06	0.05	0.06
West Penn	0.11	0.07	0.09

+ PECO statistics include electric and gas.

- The infraction rate is the number of informally verified infractions per 1,000 residential customers.
- The infraction rates from 2016 to 2017 for Penelec, PPL and West Penn increased, while the rates for Duquesne, Met-Ed, PECO and Penn Power decreased.
- Appendix H, Table 1, presents the actual number of infractions for 2017 categorized by infraction category.
- As shown in Appendix H, Table 1, the dispute handling category is noteworthy due to both high volume and high percentage of the total number of infractions.

4. Natural Gas Industry

In 2017, the Commission had jurisdiction over 25 natural gas distribution companies (NGDCs). However, the majority of the consumer complaints and PARs involving the gas industry came from residential customers of the seven major NGDCs: Columbia Gas of Pennsylvania Inc. (Columbia), National Fuel Gas Distribution Corp. (NFG), Peoples Natural Gas Co. (Peoples), Peoples-Equitable Division (Peoples-Equitable), Philadelphia Gas Works (PGW), UGI Utilities Inc.-Gas (UGI-Gas) and UGI Penn Natural Gas. This chapter will focus exclusively on those seven utilities.

As with the electric industry, most of the complaints and PARs dealt with matters covered under Chapter 56 of our regulations or Chapter 14 of the Public Utility Code. Generally, those consumer complaints and PARs represent customer appeals to the Commission resulting from the inability of the company and the customer to reach a mutually satisfactory resolution to a dispute or payment negotiation.

The statistics in the tables on the pages that follow depict the performance of each of the seven major gas utilities in 2017. Appendices F and G provide statistics for these utilities from 2016 and 2017.

Consumer Complaints

During 2017, BCS handled 2,011 consumer complaints from residential customers of the various NGDCs and 115 consumer complaints from residential customers of natural gas suppliers (NGSs). Of these residential complaints, 90 percent (1,915) were from customers of the seven largest NGDCs. For the analyses of the seven major gas companies that appear in this chapter, BCS excluded 18 consumer complaints that involved competition issues.

Consumer Complaint Categories

The following table shows the percentage of 2017 complaints from residential customers of the seven major gas utilities in each of the 14 categories used by BCS policy analysts. Appendix E, Table 2, provides the actual number of cases that fell into each category in 2017.

Consumer Complaint Categories: 2017 Major Natural Gas Distribution Companies

Categories	Columbia	NFG	Peoples	Peoples-Equitable	PGW**	UGI-Gas	UGI Penn Natural	Gas Average
Personnel Problems	27%	18%	18%	33%	18%	23%	12%	21%
Billing Disputes	27%	14%	18%	12%	22%	15%	18%	19%
Termination or PAR Procedures	10%	14%	19%	18%	16%	21%	17%	17%
Discontinuance/Transfer	7%	7%	6%	5%	16%	8%	11%	10%
Other Payment Issues	6%	9%	7%	4%	9%	5%	10%	8%
Metering	1%	14%	7%	2%	7%	5%	2%	6%
Damages	2%	5%	5%	4%	4%	6%	7%	4%
Scheduling Delays	2%	4%	8%	9%	1%	6%	7%	4%
Service Quality	2%	6%	6%	8%	2%	4%	4%	4%
Credit and Deposits	5%	2%	3%	0%	3%	3%	4%	3%
Service Extensions	6%	5%	2%	3%	<1%	3%	4%	2%
Service Interruptions	1%	0%	1%	2%	0%	0%	2%	1%
Rates	3%	0%	0%	0%	<1%	0%	0%	<1%
All Other Problems	2%	2%	0%	0%	2%	1%	1%	1%
Total-Number*	106	85	139	112	428	142	92	1,104

*Based on residential complaints opened in 2017 and evaluated by BCS as of June 8, 2018.

**Based on a probability sample of cases.

- Categories are for all residential complaints filed with BCS that were evaluated, whether or not they were found to be justified. See Appendix D-1 for an explanation of complaint categories and Appendix E, Table 2, for the number of cases in each category.
- In 2017, personnel problems generated 21 percent of the complaints about the major gas companies followed by billing disputes (19 percent). Complaints about termination or PAR procedures accounted for 17 percent of residential consumer complaints about the major gas companies.

**2017 Residential Consumer Complaint Rates/
Justified Consumer Complaint Rates
Major Natural Gas Distribution Companies**

Company	Consumer Complaint Rate	Justified Consumer Complaint Rate
Columbia	0.45	0.01
NFG	0.57	0.04
Peoples	0.62	0.00
Peoples-Equitable	0.61	0.01
PGW	2.06	0.14*
UGI-Gas	0.50	0.03
UGI Penn Natural	0.71	0.04
Average	0.79	0.04

* Justified consumer complaint rate based on a probability sample of cases.

- The consumer complaint rate equals the number of consumer complaints for each 1,000 residential customers. The justified consumer complaint rate equals the number of justified consumer complaints for each 1,000 residential customers.
- In 2017, the average of the consumer complaint rates was 19 times the average of the justified consumer complaint rates for the seven major gas companies.
- Appendix F, Table 2, presents the number of consumer complaints, the consumer complaint rate, the number of justified consumer complaints and the justified consumer complaint rate for each major gas company in 2016 and 2017.

**2016-17 Justified Residential
Consumer Complaint Rates
Major Natural Gas Distribution Companies**

Company	2016	2017
Columbia	0.02	0.01
NFG	0.02	0.04
Peoples	0.02	0.00
Peoples-Equitable	0.04	0.01
PGW*	0.37	0.14
UGI-Gas	0.02	0.03
UGI Penn Natural	0.03	0.04
Average	0.07	0.04

* Justified consumer complaint rate based on a probability sample of cases.

- The justified consumer complaint rate equals the number of justified consumer complaints for each 1,000 residential customers.
- The average justified consumer complaint rate for the major gas companies decreased from 0.07 in 2016 to 0.04 in 2017.
- The justified consumer complaint rates for Columbia, Peoples and PGW decreased, while the rates for NFG, UGI-Gas and UGI Penn Natural increased from 2016 to 2017. The 2017 justified consumer complaint rates for NFG and UGI Penn Natural were equal to the 2017 industry average.
- Appendix F, Table 2, presents the number of consumer complaints, the consumer complaint rate, the number of justified consumer complaints and the justified consumer complaint rate for each major gas company in 2016 and 2017.

**2016-17 Response Time to BCS
Residential Consumer Complaints
Major Natural Gas Distribution Companies**

Company	Number of Days 2016	Number of Days 2017	Change in Days 2016 to 2017
Columbia	5.2	5.5	0.3
NFG	5.4	9.6	4.2
Peoples	4.3	3.0	-1.3
Peoples-Equitable	2.1	3.0	0.9
PGW	17.9	19.9	2.0
UGI-Gas	5.0	5.8	0.8
UGI Penn Natural	8.3	7.4	-0.9
Average	6.9	7.8	0.9

- The calculation for average response time includes all residential consumer complaints for the major gas companies.
- The average response time for the major gas companies increased from 6.9 days in 2016 to 7.8 days in 2017.
- Consumer complaint response time performance varied among the major gas companies in 2017, from a low of 3.0 days for Peoples and Peoples-Equitable to a high of 19.9 days for PGW.

Payment Arrangement Requests

In 2017, BCS handled 12,389 PARs from residential customers of the NGDCs. There were 10 PARs from residential customers of Pennsylvania's NGSS. Of the residential PARs, 97 percent (12,010) were from customers of the seven major NGDCs. In 2017, BCS reviewed a representative sample of the PARs for case outcome for PGW and UGI-Gas. Thus, the calculation for justified PAR rate that appears in the pages that follow is based on a subset of cases that BCS received from customers of these utilities. BCS believes that the size of the samples gives an adequate indication of the performance of these companies. Appendix G, Table 2, provides additional statistics regarding the PARs from residential customers of the major NGDCs.

**2017 Residential Payment Arrangement Request (PAR) Rates/
Justified PAR Rates***
Major Natural Gas Distribution Companies

Company	PAR Rate	Justified PAR Rate
Columbia	1.41	0.02
NFG	2.74	0.11
Peoples	1.98	0.07
Peoples-Equitable	2.11	0.09
PGW	16.21	0.80*
UGI-Gas	3.71	0.28*
UGI Penn Natural	4.67	0.28
Average	4.69	0.23

* Based on a probability sample of cases.

- The PAR rate equals the number of PARs for each 1,000 residential customers. The justified PAR rate equals the number of justified PARs for each 1,000 residential customers.
- On average, there were more than four PARs to BCS for each 1,000 residential customers of the major NGDCs in 2017. There was less than one justified PAR for each 1,000 residential customers.
- Appendix G, Table 2, presents the number of PARs, the PAR rate, the number of justified PARs and the justified PAR rate for each major gas company in 2016 and 2017.

**2016-17 Justified Residential
Payment Arrangement Request (PAR) Rates*
Major Natural Gas Distribution Companies**

Company	2016	2017
Columbia	0.03	0.02
NFG	0.07	0.11
Peoples	0.05	0.07
Peoples-Equitable	0.13	0.09
PGW*	0.62	0.80
UGI-Gas*	0.37	0.28
UGI Penn Natural	0.94	0.28
Average	0.31	0.23

* Based on a probability of sample of cases.

- The justified PAR rate equals the number of justified PARs for each 1,000 residential customers.
- The average of the justified PAR rates for the seven major gas utilities decreased from 0.31 in 2016 to 0.23 in 2017. Three of the seven major gas companies had increases in their justified PAR rates.
- The 2017 justified PAR rates among the major NGDCs ranged from a low of 0.02 for Columbia to a high of 0.80 for PGW.
- Appendix G, Table 2, presents the number of PARs, the PAR rate, the number of justified PARs and the justified PAR rate for each major gas company in 2016 and 2017.

**2016-17 Response Time to BCS
Residential Payment Arrangement Requests (PARs)
Major Natural Gas Distribution Companies**

Company	Number of Days 2016	Number of Days 2017	Change in Days 2016 to 2017
Columbia	2.4	2.2	-0.2
NFG	2.9	3.2	0.3
Peoples	1.5	0.9	-0.6
Peoples-Equitable	1.3	1.7	0.4
PGW	10.0	12.0	2.0
UGI-Gas	1.6	1.7	0.1
UGI Penn Natural	1.7	1.8	0.1
Average	3.0	3.4	0.4

- The calculation for average response time includes PARs from customers of the major NGDCs whose service has been terminated, who have a dispute with the company, or who have previously had a BCS payment arrangement for the amount that they owe.
- From 2016 to 2017, the average response time for the major gas companies increased by 0.4 days.
- The 2017 PAR response times for the major NGDCs varied from a low of 0.9 days for Peoples to a high of 12.0 days for PGW.

Termination and Reconnection of Service

Each month, the gas utilities report to the Commission the number of residential accounts that they terminated for nonpayment during the previous month. They also report the number of previously terminated residential accounts that they reconnected during the month. Historically, utilities have shown a varied pattern of termination behavior, from a consistent pattern to one that fluctuates from year to year. The number of reconnections varies from year to year and from company to company, depending on a variety of factors. The NGDC reconnects a customer's terminated service either when a customer pays his/her debt in full or makes a significant payment on the debt and agrees to a payment arrangement for the balance owed to the company. The tables that follow indicate the annual number of residential accounts each of the seven largest gas utilities terminated and reconnected in 2015, 2016 and 2017. The first table also presents the termination rates for each of these companies.

Residential Service Terminations/Termination Rates
Major Natural Gas Distribution Companies

Company	Residential Service Terminations				Termination Rates		
	2015	2016	2017	% Change 2016-17	2015	2016	2017
Columbia	12,664	9,945	10,728	8%	3.27	2.55	2.73
NFG	9,025	1,422	5,490	286%	4.53	0.72	2.79
Peoples	7,894	7,536	9,744	29%	2.38	2.27	2.92
Peoples-Equitable	3,562	5,845	7,757	33%	1.45	2.40	3.13
PGW	29,602	25,805	27,443	6%	6.29	5.46	5.78
UGI-Gas	9,658	12,029	8,580	-29%	2.85	3.48	2.43
UGI Penn Natural	6,829	6,826	4,840	-29%	4.50	4.47	3.14
Total	79,234	69,408	74,582	7%			
Average of Rates					3.61	3.05	3.46

- The termination rate is the number of service terminations divided by the number of residential customers, expressed as a percent.
- Overall, the seven major gas companies terminated 7 percent more residential accounts in 2017 than in 2016.

Residential Service Reconnections
Major Natural Gas Distribution Companies

Company	2015	2016	2017	% Change 2016-17
Columbia	7,088	5,199	5,881	13%
NFG	6,081	913	4,578	401%
Peoples	5,597	5,081	5,884	16%
Peoples-Equitable	2,361	4,006	5,171	29%
PGW	19,672	16,771	18,324	9%
UGI-Gas	5,559	7,556	4,816	-36%
UGI Penn Natural	4,222	4,318	2,799	-35%
Total	50,580	43,844	47,453	8%

- Overall, the seven major NGDCs reconnected 8 percent more residential accounts in 2017 than in 2016.

Compliance

BCS provides utilities with written clarifications or explanations of Chapter 56 provisions and other Commission regulations and policies. The use of “infraction rate” is intended to help the Commission monitor the duty of natural gas companies at 66 Pa. C.S. §2206(a) to, at a minimum, maintain customer services under retail competition at the same level of quality as existed prior to the beginning of the Natural Gas Choice and Competition Act of 1999.

The infraction rates in the table that follows are based on the review of informal complaints that residential consumers filed with BCS from 2015 through 2017. Infractions identified on complaints involving competition issues are included in the infraction statistics. Appendix H, Table 2, presents detailed information about the infractions identified on 2017 cases to the BCS.

Commission Infraction Rates Major Natural Gas Distribution Companies

Company	2015	2016	2017
Columbia	0.01	0.01	0.00
NFG	0.04	0.02	0.03
Peoples	0.03	0.02	0.00
Peoples-Equitable	0.03	0.03	0.00
PGW	0.35	0.49	0.12
UGI-Gas	0.03	0.01	0.02
UGI Penn Natural	0.07	0.04	0.06

- The infraction rate is the number of informally verified infractions per 1,000 residential customers.
- From 2016 to 2017, infraction rates decreased for Columbia, Peoples, Peoples-Equitable and PGW, while the infraction rates increased for NFG, UGI-Gas and UGI Penn Natural.
- Appendix H, Table 2, presents the actual number of infractions for 2017 categorized by infraction category.
- As shown in Appendix H, Table 2, the dispute handling category is noteworthy due to both high volume and high percentage of the total number of infractions.

5. Water Industry

In 2017, the Commission had jurisdiction over 83 water companies, including 22 municipal water companies. The Commission categorizes the non-municipal water companies into one of three classifications: A, B and C. Those three classifications are based on the amount of the company's annual revenues.

The non-municipal water companies with the largest annual revenues are classified as Class A water companies. Class A water companies must have annual revenues of \$1 million or more for three years in a row. In 2017, eight Class A water companies served residential customers. The number of residential customers for these companies ranged from 2,215 for SUEZ Water Bethel to 606,453 residential customers for Pennsylvania American Water Co. (PAWC).

In 2017, the Class A water companies were Aqua Pennsylvania Inc. (Aqua), Audubon Water Co. (Audubon), Columbia Water Co. (Columbia), Newtown Artesian Water Co. (Newtown Artesian), PAWC, SUEZ Water Bethel f/k/a United Water Bethel (SUEZ Bethel), SUEZ Water PA f/k/a United Water of Pennsylvania Inc. (SUEZ PA) and York Water Co. (York). In this chapter, in addition to the statistics for the two largest companies, PAWC and Aqua, the individual statistics for the "Other Class A" companies are being presented; however, the "Other Class A" rates continue to be presented as a whole and the Class A averages are presented based on the individual rates of PAWC, Aqua and the "Other Class A" companies as a whole.

The other classes of water companies have lower annual revenues and, typically, fewer residential customers. In 2017, eight Class B companies were operating. Class B water companies have annual revenues between \$200,000 and \$999,999. In 2017, the number of residential customers for the Class B companies ranged from 287 to 2,589. There were 43 Class C companies in 2017. Class C water companies have annual revenues of less than \$200,000. The number of residential customers for the Class C companies ranged from two to 1,155 in 2017.

The municipal water companies are owned by municipalities. The Commission's jurisdiction is limited to regulating the rates and service of customers served by the municipal water companies that are outside the boundaries of the municipalities.

The majority of residential consumer complaints and PARs to BCS came from customers of the Class A water companies. Most of the complaints and PARs from water customers dealt with matters covered by Chapter 56 of our regulations or Chapter 14 of the Public Utility Code. These consumer complaints and PARs represent customer appeals to the Commission resulting from the inability of the company and the customer to reach a mutually satisfactory resolution to a dispute or payment negotiation.

The tables on the pages that follow depict the performance of the Class A water companies in 2017. Appendices F and G also present statistics about the performance of the Class A water companies.

Consumer Complaints

During 2017, BCS handled a total of 873 consumer complaints from residential customers of the various water companies. Of those complaints, 96 percent (842) were from customers of the Class A companies. The remaining 4 percent were from customers of smaller water companies. While a majority of consumer complaints involved the Class A water companies in 2017, the Commission devoted a significant amount of attention to the smaller water companies. Sometimes the amount of time BCS spends on a few

complaints from customers of a smaller company exceeds the amount of time it spends addressing complaints filed against one of the larger companies. This is because larger companies typically have more resources to respond appropriately to complaints and PARs as compared to smaller water companies with limited resources.

In 2017, customers of the small water companies filed complaints with BCS for a variety of reasons. Of the 31 consumer complaints filed about the “Non-Class A” water companies, 45 percent (14 cases) involved billing disputes.

Consumer Complaint Categories

The following table shows the percentage of 2017 complaints from residential customers of the Class A water companies in each of the 14 categories used by BCS policy analysts. Appendix E, Table 3, provides the actual number of cases that fell into each category in 2017.

Consumer Complaint Categories: 2017 Major Water Companies

Categories	Aqua	PAWC	Large Class A Avg	Audubon	Columbia	Newtown Artesian	SUEZ Bethel	SUEZ PA	York	"Other Class A" Avg**	All Class A Water Average***
Billing Disputes	38%	42%	40%	0%	67%	0%	0%	19%	29%	26%	39%
Termination or PAR Procedures	16%	17%	16%	0%	0%	0%	0%	4%	29%	12%	16%
Metering	15%	6%	10%	0%	0%	0%	0%	12%	21%	14%	10%
Service Quality	7%	7%	7%	0%	33%	0%	0%	42%	0%	28%	8%
Discontinuance/ Transfer	8%	6%	6%	0%	0%	0%	0%	4%	7%	5%	6%
Damages	3%	6%	5%	0%	0%	0%	0%	4%	7%	5%	5%
Personnel Problems	5%	4%	5%	0%	0%	0%	0%	12%	0%	7%	5%
Service Interruptions	<1%	4%	3%	0%	0%	0%	0%	4%	0%	2%	3%
Credit and Deposits	5%	1%	3%	0%	0%	0%	0%	0%	7%	2%	3%
Other Payment Issues	1%	4%	3%	0%	0%	0%	0%	0%	0%	0%	3%
Service Extensions	1%	1%	1%	0%	0%	0%	0%	0%	0%	0%	1%
Rates	<1%	<1%	<1%	0%	0%	0%	0%	0%	0%	0%	<1%
Scheduling Delays	<1%	0%	<1%	0%	0%	0%	0%	0%	0%	0%	<1%
All Other Problems	0%	1%	1%	0%	0%	0%	0%	0%	0%	0%	1%
Total-Number*	221	320	541	0	3	0	0	26	14	43	584

* Based on residential complaints opened in 2017 and evaluated by BCS as of June 8, 2018.

** Calculated based on the rate of "Other Class A" companies as a whole.

*** Calculated based on the rates of Aqua, PAWC and "Other Class A" companies as a whole.

- Categories are for all residential complaints filed with BCS that were evaluated, whether or not they were found to be justified. See Appendix D-1 for an explanation of complaint categories and Appendix E, Table 3, for the number of cases in each category.
- Of residential complaints filed against the Class A water companies, 39 percent involved billing disputes.

**2017 Residential Consumer Complaint Rates/
Justified Consumer Complaint Rates
Major Water Companies**

Company	Consumer Complaint Rate	Justified Consumer Complaint Rate
Aqua	0.64	0.19
PAWC	0.89	0.14
Large Class A Average	0.77	0.17
Audubon	0.00	0.00
Columbia	0.31	0.00
Newtown Artesian	0.00	0.00
SUEZ Bethel	0.00	0.00
SUEZ PA	0.54	0.02
York	0.25	0.00
“Other Class A” Average*	0.33	0.01
All Class A Average**	0.62	0.11

* Calculated based on the rate of “Other Class A” companies as a whole.

** Calculated based on the rates of Aqua, PAWC and “Other Class A” companies as a whole.

- The consumer complaint rate equals the number of consumer complaints for each 1,000 residential customers. The justified consumer complaint rate equals the number of justified consumer complaints for each 1,000 residential customers.
- The Large Class A consumer complaint rate is over five times greater than the justified consumer complaint rate.
- Appendix F, Table 3, presents the number of consumer complaints, the consumer complaint rate, the number of justified consumer complaints and the justified consumer complaint rate for each Class A water company in 2016 and 2017.

**2016-17 Justified Residential
Consumer Complaint Rates
Major Water Companies**

Company	2016	2017
Aqua	0.11	0.19
PAWC	0.12	0.14
Large Class A Average	0.12	0.17
Audubon	0.77	0.00
Columbia	0.00	0.00
Newtown Artesian	0.00	0.00
SUEZ Bethel	0.00	0.00
SUEZ PA	0.04	0.02
York	0.02	0.00
“Other Class A” Average*	0.04	0.01
All Class A Average**	0.09	0.11

* Calculated based on the rate of “Other Class A” companies as a whole.

** Calculated based on the rates of Aqua, PAWC and “Other Class A” companies as a whole.

- The justified consumer complaint rate equals the number of justified consumer complaints for each 1,000 residential customers.
- The Large Class A average justified consumer complaint rate increased from 0.12 in 2016 to 0.17 in 2017.
- Appendix F, Table 3, presents the number of consumer complaints, the consumer complaint rate, the number of justified consumer complaints and the justified consumer complaint rate for each Class A water company in 2016 and 2017.

**2016-17 Response Time to BCS
Residential Consumer Complaints
Major Water Companies**

Company	Number of Days 2016	Number of Days 2017	Change in Days 2016 to 2017
Aqua	19.5	18.6	-0.9
PAWC	23.0	23.5	0.5
Large Class A Average	21.3	21.1	-0.2
Audubon	12.0	0.0	-12.0
Columbia	2.5	4.0	1.5
Newtown Artesian	1.0	0.0	-1.0
SUEZ Bethel	0.0	0.0	0.0
SUEZ PA	16.2	25.5	9.3
York	5.5	5.1	-0.4
“Other Class A” Average*	11.4	17.3	5.9
All Class A Average**	18.0	19.8	1.8

* Calculated based on the rate of “Other Class A” companies as a whole.

** Calculated based on the rates of Aqua, PAWC and “Other Class A” companies as a whole.

- The calculation for average response time includes all residential consumer complaints for the Class A water companies.
- The average response time for Aqua decreased by 0.9 days from 2016 to 2017. The average response time for PAWC increased 0.5 days, from 23.0 days in 2016 to 23.5 days in 2017.

Payment Arrangement Requests

In 2017, BCS handled 3,543 PARs from residential customers of the water industry. Of the residential PARs, 99 percent (3,506) were from customers of the Class A water companies. As in past years, for the companies with the largest volume of requests, BCS policy analysts reviewed a representative sample of PARs for case outcome. In 2017, BCS reviewed a sample of the PARs for PAWC. Thus, the calculation for justified PAR rate that appears in the pages that follow is based on a subset of cases that BCS received from customers of these companies. BCS believes the size of the sample gives a reasonable indication of the performance. Appendix G, Table 3, provides additional statistics regarding the PARs from residential customers of the Class A water companies.

**2017 Residential Payment Arrangement Request (PAR) Rates/
Justified PAR Rates
Major Water Companies**

Company	PAR Rate	Justified PAR Rate
Aqua	1.60	0.13
PAWC	4.43	0.76*
Large Class A Average	3.02	0.45
Audubon	0.39	0.00
Columbia	3.02	0.00
Newtown Artesian	0.10	0.00
SUEZ Bethel	0.00	0.00
SUEZ PA	1.02	0.08
York	1.61	0.00
“Other Class A” Average**	1.34	0.03
All Class A Average***	2.46	0.31

* Justified PAR rates based on a probability sample of cases.

** Calculated based on the rate of “Other Class A” companies as a whole.

*** Calculated based on the rates of Aqua, PAWC and “Other Class A” companies as a whole.

- The PAR rate equals the number of PARs for each 1,000 residential customers. The justified PAR rate equals the number of justified PARs for each 1,000 residential customers.
- On average, there were over two PARs to BCS for each 1,000 residential customers of the Class A water companies in 2017. There was less than one justified PAR for each 1,000 residential customers.
- Appendix G, Table 3, presents the number of PARs, the PAR rate, the number of justified PARs and the justified PAR rate for each Class A water company in 2016 and 2017.

**2016-17 Justified Residential
Payment Arrangement Request (PAR) Rates
Major Water Companies**

Company	2016	2017
Aqua	0.11	0.13
PAWC*	0.60	0.76
Large Class A Average	0.35	0.45
Audubon	0.00	0.00
Columbia	0.00	0.00
Newtown Artesian	0.00	0.00
SUEZ Bethel	0.00	0.00
SUEZ PA	0.04	0.08
York	0.08	0.00
“Other Class A” Average**	0.06	0.03
All Class A Average***	0.26	0.31

* Based on a probability sample of cases.

** Calculated based on the rate of “Other Class A” companies as a whole.

*** Calculated based on the rates of Aqua, PAWC and “Other Class A” companies as a whole.

- The justified PAR rate equals the number of justified PARs for each 1,000 residential customers.
- Between 2016 and 2017, the justified PAR rates increased for Aqua, from 0.11 to 0.13, and PAWC, from 0.60 to 0.76.
- Appendix G, Table 3, presents the number of PARs, the PAR rate, the number of justified PARs and the justified PAR rate for each Class A water company in 2016 and 2017.

**2016-17 Response Time to BCS
Residential Payment Arrangement Requests (PARs)
Major Water Companies**

Company	Number of Days 2016	Number of Days 2017	Change in Days 2016 to 2017
Aqua	11.2	9.9	-1.3
PAWC	12.5	15.6	3.1
Large Class A Average	11.8	12.8	1.0
Audubon	0.0	46.0	46.0
Columbia	4.2	4.0	-0.2
Newtown Artesian	0.0	0.0	0.0
SUEZ Bethel	0.0	0.0	0.0
SUEZ PA	10.3	19.7	9.4
York	2.4	3.3	0.9
“Other Class A” Average*	5.3	9.1	3.8
All Class A Average**	9.6	11.6	2.0

* Calculated based on the rate of “Other Class A” companies as a whole.

** Calculated based on the rates of Aqua, PAWC and “Other Class A” companies as a whole.

- The calculation for average response time includes PARs from customers of the Class A water companies whose service has been terminated, who have a dispute with the company, or who have previously had a BCS payment arrangement for the amount that they owe.
- Aqua’s response time decreased 1.3 days to 9.9 days in 2017. PAWC’s response time increased 3.1 days, from 12.5 days in 2016 to 15.6 days in 2017.

Termination and Reconnection of Service

Each month, the water utilities report to the Commission the number of residential accounts that they terminated for nonpayment during the previous month. They also report the number of previously terminated residential accounts that they reconnected during the month. Historically, utilities have shown a varied pattern of termination behavior, from a consistent pattern to one that fluctuates from year to year. The number of reconnections varies from year to year and from company to company, depending on a variety of factors. The water company reconnects a customer’s terminated service either when a customer pays his/her debt in full or makes a significant payment on the debt and agrees to a payment arrangement for the balance owed to the company. The tables that follow indicate the annual number of residential accounts each of the water utilities terminated and reconnected in 2015, 2016 and 2017. The first table also presents the termination rates for each of these companies.

Residential Service Terminations/Termination Rates
Major Water Companies

Company	Residential Service Terminations				Termination Rates		
	2015	2016	2017	% Change 2016-17	2015	2016	2017
Aqua	5,294	6,735	5,912	-12%	1.36	1.70	1.48
PAWC	20,750	17,796	21,475	21%	3.48	2.97	3.54
Large Class A Total	26,044	24,531	27,387	12%			
Large Class A Average of Rates					2.42	2.34	2.73
Audubon	3	0	0	0%	0.12	0.00	0.00
Columbia	132	183	197	8%	1.40	1.93	2.05
Newtown Artesian	53	50	62	24%	0.56	0.52	0.65
SUEZ Bethel	0	0	0	0%	0.00	0.00	0.00
SUEZ PA	428	725	501	-31%	0.80	1.35	1.00
York	1,192	1,113	953	-14%	1.99	1.86	1.56
“Other Class A” Total	1,818	2,071	1,713	-17%			
“Other Class A” Average of Rates*					0.73	0.94	1.27
All Class A Total	27,862	26,602	29,100	9%			
All Class A Average of Rates**					1.86	1.87	2.55

* Calculated based on the rate of “Other Class A” companies as a whole.

** Calculated based on the rates of Aqua, PAWC and “Other Class A” companies as a whole.

- The termination rate is the number of service terminations divided by the number of residential customers, expressed as a percent.
- Overall, the Class A water companies terminated 9 percent more residential accounts in 2017 than in 2016.

Residential Service Reconnections Major Water Companies

Company	2015	2016	2017	% Change 2016-17
Aqua	3,521	4,815	4,734	-2%
PAWC	16,850	15,601	18,947	21%
Large Class A Total	20,371	20,416	23,681	16%
Audubon	0	0	0	0%
Columbia	85	118	137	16%
Newtown Artesian	43	47	49	4%
SUEZ Bethel	0	0	0	0%
SUEZ PA	283	467	364	-22%
York	698	820	585	-29%
“Other Class A” Total	1,110	1,452	1,135	-22%
All Class A Total	21,481	21,868	24,816	13%

- Overall, the Class A water companies reconnected 13 percent more residential accounts in 2017 than in 2016.

Compliance

BCS provides water utilities with written clarifications or explanations of Chapter 56 provisions and other Commission regulations and policies.

The infraction rates in the table that follows are based on the review of informal complaints that residential consumers filed with BCS from 2015 through 2017. Appendix H, Table 3, presents detailed information about the infractions identified on 2017 cases to the BCS.

Commission Infraction Rates Major Water Companies

Company	2015	2016	2017
Aqua	0.25	0.20	0.36
PAWC	0.25	0.18	0.16
Audubon	0.00	0.77	0.00
Columbia	0.00	0.00	0.00
Newtown Artesian	0.00	0.00	0.00
SUEZ Bethel	0.00	0.00	0.00
SUEZ PA	0.02	0.04	0.02
York	0.00	0.00	0.00

- The infraction rate is the number of informally verified infractions per 1,000 residential customers.
- The infraction rates for PAWC, Audubon and SUEZ PA decreased from 2016 to 2017, while the infraction rate for Aqua increased. The rates for Columbia, Newtown Artesian, SUEZ Bethel and York remained stable.
- Appendix H, Table 3, presents the actual number of infractions for 2017 categorized by infraction category.
- As shown in Appendix H, Table 3, the dispute handling category is noteworthy due to both high volume and high percentage of the total number of infractions.

Programs That Assist Low-Income Customers

Several water companies voluntarily operate programs to assist low-income customers in maintaining water service.

Aqua Pennsylvania Inc. (Aqua) - In 1994, Aqua implemented a pilot program that provided payment assistance and conservation services to low-income customers. Aqua named this program "Helping Hand." In 1996, Aqua made the program a permanent part of its low-income assistance.

Helping Hand is for customers at or below 200 percent of the federal poverty level. On April 1, 2009, in recognition of the current economic climate, the company eased the remaining minimum requirements. The company reduced the minimum past amount due from \$150 to \$110, and the minimum number of days past due from 30 to 21. Each household enrolled in the Helping Hand program receives a plumbing inspection, including minor repairs, and/or a conservation kit, containing water-saving devices. The customer also receives water usage and conservation information. Customers who make their payments on time and in full receive a credit of \$20 per month applied to their arrearage.

At the end of 2017, 206 active participants were enrolled in the Helping Hand program. During the year, Aqua spent \$80,437 to complete eligibility interviews and household audits. In addition, the company provided \$13,180 in arrearage forgiveness credits to 214 program participants.

Pennsylvania American Water Co. (PAWC) – In 1991, PAWC established the “Help to Others” (H2O) program. Beginning Jan. 1, 2018, the H2O program increased its benefit to customers by providing customers with an 85 percent discount on their monthly service fees – a savings of about \$14 per month. The program also provides water-saving devices and conservation education. As of April 2018, there were 17,931 customers billed the discounted rate.

In addition to a discount for water, the company also offers a discount for wastewater customers. Beginning Jan. 1, 2018, this discount was increased. It now offers a 20 percent discount off the total wastewater billing for those who qualify. As of April 2018, there were 1,727 customers billed the discount for wastewater.

As part of the H2O program, PAWC also participates with the Dollar Energy Fund to provide cash grants of up to \$500 per year for those water and wastewater customers listed above. Dollar Energy Fund is a hardship fund administrator that provides cash assistance to utility customers who need help in paying their utility bills. During the 2016-17 program year, PAWC’s shareholders and customers provided \$351,955 in hardship fund benefits to 1,253 customers for an average benefit of \$281. In addition, PAWC’s shareholders provided \$10,000 for the 2016-17 program year for their wastewater customers. The funds provided benefits to 33 customers for an average benefit of \$333.

Suez Water Pennsylvania f/k/a United Water of Pennsylvania Inc. (Suez Water PA) – Suez Water PA implemented the “Suez Cares” f/k/a “UW Cares” program in 2005. Suez Cares is a nonprofit 501(c)(3) organization that provides financial assistance to customers who experience a temporary financial crisis caused by such occurrences as a job loss, severe illness, casualty or extensive military service. Cash grants up to \$100 are provided to qualifying customers who are first screened by the Salvation Army for eligibility. To be eligible for a grant, customers must have made a nominal payment within the last 90 days. During the 2017 program year, the company provided grants totaling \$3,858 to qualifying customers.

York Water Co. – In 2005, the York Water Co. established the “York Water Cares” program. This program offers qualified customers up to \$120 in arrearage forgiveness benefits and plumbing repairs. The repairs are designed to help the customer conserve and reduce overall water usage.

During 2017, the company expended \$790 for customer plumbing repairs and enrolled a total of five new customers in the York Water Cares program. As of program end 2017, six customers received arrearage forgiveness benefits totaling \$420 for an average benefit of approximately \$70 per customer. The company anticipates an annual savings of \$300 in costs for termination proceedings that may be avoided as a result of customer participation in the York Water Cares program.

6. Telephone Industry

During 2017, BCS handled consumer complaints, payment agreement requests (PARs) and inquiries from the customers of a variety of telecommunications service providers, including incumbent local exchange carriers (ILECs), competitive local exchange carriers (CLECs), long-distance companies, resellers and wireless eligible telecommunications carriers (Wireless ETCs).

In 2017, there were 613 providers of telecommunications services with certificates of public convenience in Pennsylvania. Of these, 37 were ILECs. The ILECs included 32 non-major utilities that each served less than 50,000 residential customers and five major utilities that each served over 50,000 residential customers.

This chapter will focus on the five major ILECs in 2017 – CenturyLink (CenturyLink), Frontier Communications Commonwealth Telephone Co. (Frontier Commonwealth), Verizon North LLC (Verizon North), Verizon Pennsylvania LLC (Verizon PA) and Windstream Communications (Windstream).

Unlike the electric, gas and water chapters, the analyses of the five companies that appear in this chapter include complaints about competition-related issues such as slamming, competition-related service complaints and billing problems. This is the 15th year that BCS included competition-related complaints in its analyses of the telephone companies.

Act 183 of 2004, the Nov. 30, 2004 amendment to Chapter 30, addressed allowing a local exchange carrier to petition the Commission for a determination of whether a protected or retail non-competitive service was competitive based on the availability of like or substitute services offered by other providers. On Mar. 4, 2015, the Commission entered the Opinion and Order at Docket Nos. P-2014-2446303 and P-2014-2446304, which granted competitive reclassification in 153 Verizon PA and Verizon North wire centers for which competitive reclassification was sought for basic local exchange telephone services.² The reclassification waived certain sections of 52 Pa. Code, Chapters 63³ and 64⁴ for a maximum of 5 years or a final rule making.

Consumer Complaints

Although BCS handled consumer complaints about different types of telecommunications service providers in 2017, the complaints predominantly came from the residential customers of the five major ILECs. Overall, BCS handled 1,398 consumer complaints from residential customers of telecommunications service providers in 2017. Of those complaints, 1,278 were from residential customers of the five major ILECs, while 19 consumer complaints were received for the non-major ILECs. Meanwhile, 44 consumer complaints were from residential customers of the CLECs operating in Pennsylvania. Additionally, BCS handled 46 consumer complaints regarding wireless ETCs that provide Lifeline services in Pennsylvania, and the remaining 11 consumer complaints were from residential customers of other telecommunications providers such as long-distance carriers, resellers and Voice over Internet Protocol (VoIP) providers.

² See Appendix B of Docket Nos. P-2014-2446303 and P-2014-2446304, Mar. 4, 2015.

³ See Appendix D of Docket Nos. P-2014-2446303 and P-2014-2446304, Mar. 4, 2015.

⁴ See Appendix E of Docket Nos. P-2014-2446303 and P-2014-2446304, Mar. 4, 2015.

Consumer Complaint Categories

The following table shows the percentage of 2017 consumer complaints from residential customers of the major telephone companies in each of the 11 categories used by BCS policy analysts to categorize consumer complaints about telephone companies.

Consumer Complaint Categories: 2017
Major Local Telephone Companies

Categories	Century-Link	Frontier Common-wealth	Verizon North	Verizon PA**	Wind-stream	Telephone Average
Unsatisfactory Service	53%	59%	59%	54%	70%	57%
Billing Disputes	14%	9%	13%	11%	6%	10%
Service Delivery	4%	8%	4%	6%	7%	6%
Service Terminations	4%	3%	2%	2%	0%	2%
Competition	0%	2%	0%	1%	2%	1%
Discontinuance/Transfer	0%	3%	2%	1%	0%	1%
Annoyance Calls	0%	0%	0%	1%	2%	1%
Non-Recurring Charges	1%	2%	0%	0%	0%	<1%
Toll Services	1%	0%	0%	<1%	1%	<1%
Credit and Deposits	0%	1%	0%	<1%	0%	<1%
All Other Problems	23%	12%	20%	25%	12%	21%
Total-Number*	78	95	46	460	121	800

*Based on residential complaints opened in 2017 and evaluated by BCS as of June 8, 2018.

**Based on a probability sample of cases.

- Categories are for all residential complaints filed with BCS, whether or not they were found to be justified. See Appendix D-2 for an explanation of complaint categories and Appendix E, Table 4, for the number of cases in each category.
- Of all complaints for the major telephone companies, 73 percent fall into one of three complaint categories: unsatisfactory service, billing disputes or service delivery.
- Unsatisfactory service complaints account for 57 percent of the total number of consumer complaints for the five major telephone companies in 2017. In 2016, unsatisfactory service accounted for 51 percent of all consumer complaints for the major telephone companies.

The 2016 and 2017 consumer complaint figures for justified consumer complaint rates and response times for each of the major telephone companies are presented on the following pages. Appendix F, Table 4, provides additional statistics about the consumer complaints from residential customers of the five major local telephone companies.

**2017 Residential Consumer Complaint Rates/
Justified Consumer Complaint Rates
Major Local Telephone Companies**

Company	Consumer Complaint Rate	Justified Consumer Complaint Rate
CenturyLink	0.72	0.31
Frontier Commonwealth	1.19	0.78
Verizon North	0.41	0.16
Verizon PA	1.40	0.60*
Windstream	1.72	1.18
Average	1.09	0.61

* Justified consumer complaint rate based on a probability sample of cases.

- The consumer complaint rate equals the number of consumer complaints for each 1,000 residential customers. The justified consumer complaint rate equals the number of justified consumer complaints for each 1,000 residential customers.
- For the five major telephone companies, the average consumer complaint rate is nearly two times greater than the average justified consumer complaint rate.
- Appendix F, Table 4, presents the number of consumer complaints, the consumer complaint rate, the number of justified consumer complaints and the justified consumer complaint rate for each major telephone company in 2016 and 2017.

**2016-17 Justified Residential
Consumer Complaint Rates
Major Local Telephone Companies**

Company	2016	2017
CenturyLink	0.23	0.31
Frontier Commonwealth	0.46	0.78
Verizon North	0.25	0.16
Verizon PA*	0.49	0.60
Windstream	0.69	1.18
Average	0.42	0.61

* Based on a probability sample of cases.

- The justified consumer complaint rate equals the number of justified consumer complaints for each 1,000 residential customers.
- The justified consumer complaint rates for four of the five of the major telephone companies increased, while one decreased.
- Frontier Commonwealth and Windstream had justified consumer complaint rates that were higher than the industry average.
- Appendix F, Table 4, presents the number of consumer complaints, the consumer complaint rate, the number of justified consumer complaints and the justified consumer complaint rate for each major telephone company in 2016 and 2017.

2016-17 Response Time to BCS Residential Consumer Complaints Major Local Telephone Companies

Company	Number of Days 2016	Number of Days 2017	Change in Days 2016 to 2017
CenturyLink	9.9	10.0	0.1
Frontier Commonwealth	20.5	11.6	-8.9
Verizon North	14.1	13.4	-0.7
Verizon PA	14.9	13.9	-1.0
Windstream	26.3	23.0	-3.3
Average	17.1	14.4	-2.7

- For the five major telephone companies, the average response time to consumer complaints decreased from 17.1 days in 2016 to 14.4 days in 2017.
- The average response time for Frontier Commonwealth decreased by nearly 9 days since 2016.

Payment Agreement Requests

Telephone service consists of three components: basic service, non-basic service and toll service. BCS does not handle customer requests for payment agreements that involve toll or non-basic services because with respect to telephone payment agreements, the PUC's jurisdiction is limited to basic voice service. For the telephone industry, PARs are principally contacts to BCS or to companies involving a request for payment terms for arrearages associated with basic service. Failure to enter into a payment agreement or pay arrearages due for basic service may result in suspension, and subsequent termination, of basic service⁵. Suspension of basic telephone service involves the temporary cessation of service without the consent of the customer, while termination of basic service is the permanent cessation of service. The majority of PARs are from customers who contact BCS to request payment agreements after they have received a suspension notice.

Under Chapter 64, a customer contact in response to a suspension notice is a dispute (as the term is defined in Section 64.2) only if the contact includes a disagreement with respect to the application of a provision of Chapter 64. Where telephone cases involving telephone service suspension are concerned, failure to negotiate a payment agreement does not in itself mean that a dispute exists. Consequently, in this report, telephone cases that involve PARs have been separated from telephone PARs that also involve a dispute. For the telephone industry, PARs that involve a dispute are classified as consumer complaints. During 2017, BCS handled 60 PARs from residential customers of telecommunications service providers. Of these PARs, 57 were from residential customers of the five major telephone companies.

⁵ Suspension or termination of basic local exchange service can also occur when a consumer refuses to voluntarily transition their service from traditional copper to fiber during an ILEC's network transformation.

The 2016 and 2017 justified PAR rates and response times for the major telephone companies are presented in the tables that follow.

**2017 Residential Payment Agreement Request (PAR) Rates/
Justified PAR Rates
Major Local Telephone Companies**

Company	PAR Rate	Justified PAR Rate
CenturyLink	0.04	0.01
Frontier Commonwealth	0.08	0.01
Verizon North	0.00	n/a*
Verizon PA	0.06	0.00
Windstream	0.07	0.02
Average	0.05	0.01*

* No PARs were received for Verizon North in 2017, so its justified PAR rate could not be calculated; therefore, the calculation of the industry average excludes Verizon North.

- The PAR rate equals the number of PARs for each 1,000 residential customers. The justified PAR rate equals the number of justified PARs for each 1,000 residential customers.
- On average, there was less than one PAR to BCS for each 1,000 residential customers of the major telephone companies in 2017. There was less than one justified PAR for each 1,000 residential customers.
- Appendix G, Table 4, presents the number of PARs, the PAR rate, the number of justified PARs and the justified PAR rate for each major telephone company in 2016 and 2017.

**2016-17 Justified Residential
Payment Agreement Request (PAR) Rates
Major Local Telephone Companies**

Company	2016	2017
CenturyLink	0.02	0.01
Frontier Commonwealth	0.02	0.01
Verizon North	0.00	n/a*
Verizon PA	0.02	0.00
Windstream	0.01	0.02
Average	0.01	0.01*

* No PARs were received for Verizon North in 2017, so its justified PAR rate could not be calculated; therefore, the calculation of the 2017 industry average excludes Verizon North.

- The justified PAR rate equals the number of justified PARs for each 1,000 residential customers.
- The average justified PAR rate for the five major telephone companies remained stable at 0.01 from 2016 to 2017. Windstream had a justified PAR rate greater than the 2017 industry average.
- Three of the five major telephone companies had justified PAR rates that decreased from 2016 to 2017, while one increased.
- Appendix G, Table 4, presents the number of PARs, the PAR rate, the number of justified PARs and the justified PAR rate for each major telephone company in 2016 and 2017.

**2016-17 Response Time to BCS
Residential Payment Agreement Requests (PARs)
Major Local Telephone Companies**

Company	Number of Days 2016	Number of Days 2017	Change in Days 2016 to 2017
CenturyLink	5.4	6.6	1.2
Frontier Commonwealth	16.8	3.1	-13.7
Verizon North	27.0	n/a*	n/a
Verizon PA	13.5	8.6	-4.9
Windstream	19.3	21.6	2.3
Average	16.4	10.0*	-6.4

* No PARs were received for Verizon North in 2017, so its response time could not be calculated; therefore, the calculation of the 2017 industry average excludes Verizon North.

- The average response time to PARs for the five major telephone companies decreased from 16.4 days in 2016 to 10.0 days in 2017.
- Of the five major telephone companies, the response time to PARs for Frontier Commonwealth and Verizon PA decreased from 2016 to 2017.

Termination of Service

Chapter 64 defines suspension as a temporary cessation of service without the consent of the customer. Termination of service, according to Chapter 64, is the permanent end of service after a suspension without the consent of the customer. Most PARs are cases relating to the termination of telephone service and are registered during the suspension phase. Many customers who have their basic service suspended are able to make payment agreements and avoid termination. Those who are not able to avoid termination cease to be customers once the termination of basic service takes place. Shifts in terminations can signal potential problems with customers maintaining basic telephone service and reflect the impact of universal service programs.

Residential Service Terminations/Termination Rates Major Local Telephone Companies

Company	Residential Service Terminations				Termination Rates		
	2015	2016	2017	% Change 2016-17*	2015	2016	2017
CenturyLink	7,044	9,588	8,232	n/a	52.16	74.40	64.56
Frontier Commonwealth	2,460	2,388	3,168	n/a	23.20	23.62	33.30
Verizon North	4,164	4,056	3,060	n/a	24.62	27.07	23.84
Verizon PA	28,980	25,404	18,132	n/a	32.66	33.97	28.92
Windstream	3,204	3,132	3,240	n/a	33.10	34.51	38.71
Total	45,852	44,568	35,832	n/a			
Average of Rates					33.15	38.71	37.86

*The percent change comparison of the number of residential terminations is not applicable to the telephone industry because it does not accurately reflect the reduction in the number of regulated service lines between 2016 and 2017.

- The termination rate equals the number of basic service terminations for each 1,000 residential customers.
- Overall, the average residential service termination rate for the major telephone companies decreased from 38.71 in 2016 to 37.86 in 2017.

Compliance

The informal compliance notification process enables BCS to provide companies with written clarifications and explanations of Chapters 30, 63 and 64 provisions and other Commission regulations and policies. The informal compliance process is specifically designed to identify systemic errors. Companies can then investigate the scope of the problem and take corrective action. Appropriate corrective action usually involves modifying a computer program; revising the text of a notice, a billing or a letter; changing a company procedure; or providing additional staff training to ensure the proper implementation of a sound procedure.

Each year, BCS retrieves infraction data from the BCS Compliance Tracking System and produces tables that present infraction statistics for the major telephone companies reviewed in this chapter. The infraction statistics are drawn from cases that residential consumers filed with BCS in 2015, 2016 and 2017. Appendix H, Table 4, presents detailed information about the infractions identified on 2017 cases to the BCS.

Commission Infraction Rates Major Local Telephone Companies

Company	2015	2016	2017
CenturyLink	0.24	0.50	0.92
Frontier Commonwealth	0.89	1.42	2.84
Verizon North	0.76	1.11	0.51
Verizon PA	0.75	1.20	1.52
Windstream	1.32	2.91	5.46

- The infraction rate is the number of informally verified infractions per 1,000 residential customers.
- Since 2016, the infraction rates for four of the five major telephone companies increased, while one decreased.
- Appendix H, Table 4, presents the actual number of infractions found on 2017 informal complaints for the major local telephone companies by infraction category.

Universal Service Programs

As part of its ongoing responsibilities, BCS monitors the universal service programs of local telephone companies and wireless companies. For the telephone industry, universal service programs⁶ include Lifeline Service (Lifeline),⁷ Lifeline 100 Service (Lifeline 100)⁸ through Verizon PA and Verizon North and the Verizon PA Universal Telephone Assistance Program (UTAP). These programs ensure that low-income consumers have access to telephone service by providing discounts or credits for telephone service. The Commission approved the implementation of Pennsylvania's first universal service program for local telephone companies in 1989.⁹ In December 1997, the Commission approved Lifeline service plans for 44 incumbent telephone companies which led to the statewide implementation of telephone companies' Lifeline programs in 1998.

Lifeline

The Commission's May 19, 2005, Final Lifeline Order (Final Order), at Docket No. M-00051871 expanded the Lifeline program eligibility to be consistent with the Federal Communications Commission's (FCC) programs.¹⁰ The Final Order added an income-only based factor (income at or below 135 percent of the federal poverty guidelines) as a new criterion for Pennsylvania's Lifeline program eligibility. Second, the Final

⁶ With the exception of UTAP, these programs are supported fully or in part by federal universal service funds.

⁷ Lifeline f/k/a/ Lifeline 135 in previous UCARE reports

⁸ Lifeline 100 f/k/a as Lifeline in previous UCARE reports

⁹ The Link-Up America Program was the first universal service program. The FCC eliminated this program in 2012.

¹⁰ FCC Report and Order and Further Notice of Proposed Rulemaking in the Matter of Lifeline and Link-Up, at CC Docket No. 04-87, WC Docket No. 03-109.

Order directed all jurisdictional Eligible Telecommunication Carriers (ETCs)¹¹ to implement the Lifeline provisions contained in Chapter 30. Under these provisions,¹² ETCs are to inform new and existing customers about the availability of Lifeline services. They also must permit eligible Lifeline service customers to purchase any number of optional services (i.e. call waiting) at the tariffed rates for these services.

In August 2010, the Commission adopted the final Policy Statement on the Commonwealth of Pennsylvania Guidelines for Designation and Annual Recertification as an ETC for purposes of Federal Universal Service Support (ETC Guidelines).¹³ Designation as an ETC for provision of Lifeline service permits the wireline and wireless providers to participate in the federal Universal Service Fund's (USF) Lifeline program in order to receive low-income support from the federal USF.¹⁴

On Mar. 2, 2012, the FCC issued a Final Rule¹⁵ which reformed and began to modernize the federal USF Lifeline program. The reforms were intended to accomplish the following: (1) strengthen protections against waste, fraud and abuse; (2) improve program administration and accountability; (3) improve enrollment and consumer disclosures; (4) initiate modernization of the program for broadband; and (5) constrain the growth of the program to reduce the burden of all who contribute to the federal USF. In addition, the FCC identified numerous unserved census block groups in Pennsylvania where wireless ETCs were encouraged to bid to receive Mobility Fund Phase 1 support to build infrastructure over which to deliver 3G or better broadband and voice service. In October 2012, T-Mobile Northeast, LLC and NEP Cellcorp, Inc. won the bids to build the infrastructure in designated areas of Pennsylvania.

The Commission's Nov. 9, 2016, Order at Docket No. M-2016-2566383 adopted the eligibility criteria from the FCC's Lifeline and Link Up Reform and Modernization, Third Report and Order (2016 Order), WC Docket No. 11-42 released Apr. 27, 2016. Effective Dec. 2, 2016, eligibility for Lifeline support was streamlined to include the following programs: Supplemental Nutrition Assistance Program (SNAP), Medicaid, Supplemental Security Insurance (SSI), Federal Public Housing Assistance and Veterans Pension Benefits. The income-based eligibility (135 percent of Federal Poverty Guidelines) did not change. The Commission's order required jurisdictional ETCs to adhere to all federal ETC rules, regulations and standards including: (1) broadband as a supported service; (2) minimum service standards for broadband; (3) mobile voice and mobile broadband access services;¹⁶ (4) the establishment of a National Verifier; and (5) port freeze rules.¹⁷

¹¹ Jurisdictional ETCs include all ILECs and other providers of communications services that have obtained ETC designation from the state commission or the FCC. ETCs may receive universal service funding.

¹² 66 Pa. C.S. §§ 3019 (f)(1-4).

¹³ Docket No. M-2010-2164741, July 29, 2010, which codifies the guidelines at 52 Pa. Code § 69.2501.

¹⁴ 47 C.F.R. §§ 214(e)(3-4) In a community where no telephone company provides services supported by federal universal support mechanisms, the FCC (for interstate) and PUC (for intrastate) will determine which telephone company is best able to provide such service. Any telephone company ordered to provide such service will be designated as an ETC for that community and become eligible to receive universal service support. This is the carrier of last resort (COLR) obligation.

¹⁵ 47 CFR Part 54 – Universal Service

¹⁶ As of Dec. 1, 2017, the minimum standard for wireless talk is 750 minutes, the minimum wireless broadband usage is 1 GB per month on a 3G or better network. For bundled service, only one service must meet the minimum standard. The minimum standard for fixed broadband is 15 Mbps download and 2 Mbps upload, with minimum usage of 250 GB per month.

¹⁷ In its 2016 Lifeline Order, the FCC established port freeze rules, during which Lifeline subscribers were not eligible to change providers. The port freeze for voice only service was 60 days, the port freeze for broadband and wireless broadband service was 12 months.

On Dec. 1, 2017, the FCC released the Lifeline and Link Up Reform and Modernization Fourth Report and Order. In that order, the FCC determined that the disadvantages to consumers of the 2016 port freeze rules outweighed the benefits. As such effective Mar. 19, 2018, the FCC eliminated the port freeze rules. The order also clarified that Wi-Fi is not a substitute for fixed broadband or mobile broadband delivered on a 3G or better network and is not eligible for Lifeline reimbursement.

Currently Lifeline is offered by ILECs, CLECs and some wireless carriers. As of Dec. 31, 2017, there were 467,102 low income Pennsylvania consumers enrolled in Lifeline. Wireless carriers provide Lifeline service to 449,443 of those consumers. The following table shows enrollment activity for the major telephone companies' Lifeline programs in 2016 and 2017.

Lifeline Service Activity 2016-17

Company	Total Number of Customers Who Received Lifeline Service		Total Number of Customers Enrolled as of December	
	2016	2017	2016	2017
CenturyLink	1,586	1,325	1,037	951
Frontier Commonwealth	1,292	1,159	1,016	917
Verizon North*	2,591	2,036	1,669	1,496
Verizon PA*	19,117	14,981	12,003	10,896
Windstream	2,641	1,939	1,550	1,389
Total	27,227	21,440	17,275	15,649

* Includes customers enrolled in both the Lifeline and Lifeline 100 programs.

As of July 1, 2017, the monthly credit is \$9.25 for the Lifeline program, and \$11.75 for the Verizon companies' Lifeline 100 program.

Universal Telephone Assistance Program

Verizon PA implemented a Universal Telephone Assistance Program (UTAP) along with its Lifeline service program as part of a settlement agreement that was approved by the Commission Aug. 4, 1995 (P-00930715, P-00950958). Verizon PA is the only company that offers a financial assistance program that helps existing Lifeline customers and qualified Lifeline applicants (with a pre-existing basic service arrearage) to restore their basic telephone service. The Dollar Energy Fund manages UTAP and distributes funds to qualified customers and Lifeline applicants. The average UTAP assistance grant given to customers in 2017 was \$58. Overall, UTAP distributed \$2,418 in financial assistance to 42 of Verizon PA's qualified customers in 2017.

Automatic Notification Program

The Lifeline service automatic notification provision at 66 Pa. C.S. § 3019(f)(5) requires that all jurisdictional ETCs provide the Department of Human Services (DHS), formerly the Department of Public Welfare, with service descriptions, subscription forms, contact telephone numbers and service area information so DHS can notify its clients about the availability of Lifeline service. In 2005, a working group consisting of representatives of the PUC, Pennsylvania Telephone Association, the Office of Consumer

Advocate and the Pennsylvania Utility Law Project worked with DHS to implement this provision. Commission staff coordinated with members of the working group to develop subscription forms and listings of company contacts by county. Commission staff continues to provide DHS with copies of informational brochures and a link to the Commission's website for information about companies that offer Lifeline programs.

Wireless ETC Designation

In its 2005 First Universal Service Report and Order, the FCC established minimum requirements for telecommunications carriers to be designated as ETCs and encouraged states that exercise jurisdiction over ETC designation to adopt the same requirements.¹⁸ This order applied to both wireline and wireless carriers.

On Apr. 11, 2008, the FCC conditionally designated TracFone Wireless, Inc. (TracFone) as the first wireless ETC in PA. The FCC's designation allowed TracFone to provide Lifeline service and receive reimbursement for Lifeline from the Federal Universal Service Fund (USF) but did not make the company eligible for USF high-cost support.¹⁹ At the time of the FCC designation, Pennsylvania had not yet exerted jurisdiction over wireless providers for the purpose of ETC designation.

On Aug. 2, 2010, the PUC entered its Final Policy Statement Order, at Docket No. M-2010-2164741. This order adopted the FCC minimum requirements for ETC designation but also established additional state specific requirements.²⁰ On Dec. 22, 2010, Virgin Mobile USA, LP became the first wireless ETC designated by the PA PUC. The following table shows the wireless ETCs that operated in PA in 2017.

¹⁸ See Matter of Federal-State Joint Board of Universal Service, First Report and Order, CC Docket No. 96-45, 20 FCC Rcd 6371 (released March 17, 2005).

¹⁹ See TracFone ETC Designation Order, CC Docket No. 96-45, Order, 23 FCC Rcd 6206 (released April 11, 2008).

²⁰ See 66 Pa. C.S. § 3019(f).

2017 PA Wireless ETCs

Company	PUC Docket #	Date of ETC Designation
Airvoice Wireless d/b/a Feel Safe Wireless	P-2013-2379431	7/9/2014
American Broadband d/b/a American Assistance	P-2013-2362571	11/5/2015
AmeriMex d/b/a Safety Net Wireless	P-2013-2369557	3/6/2014
Blue Jay Wireless	P-2012-2325045	8/29/2013
Boomerang Wireless d/b/a enTouch Wireless	P-2014-2421056	9/1/2016
Buffalo-Lake Erie d/b/a	P-2013-2382739	11/13/2014
Budget Prepay*	P-2011-2269524	6/21/2012
Global Connection Inc. d/b/a Stand Up Wireless	P-2011-2245213	9/13/2012
iWireless d/b/a Access Wireless	P-2011-2235119	9/3/2015
Limitless Mobile	P-2012-2287339	5/24/2012
Q-Link	P-2011-2275830	4/18/2013
Sage Telecom d/b/a TruConnect	P-2013-2398807	1/15/2015
Tag Mobile	P-2011-2241542	12/5/2012
Telrite Corp d/b/a Life Wireless	P-2011-2398807	9/26/2013
T-Mobile d/b/a InReach Wireless	P-2011-2275748	5/24/2012
Tracfone d/b/a Safelink**	n/a	n/a
Virgin Mobile d/b/a Assurance Wireless	P-2010-2155915	12/22/2010
YourTel America d/b/a TerraCom	P-2011-2226044	10/14/2011

*Budget Prepay relinquished its ETC status effective Aug. 10, 2017.

**The FCC approved Tracfone as an ETC for the purpose of providing Lifeline service prior to the PUC exercising its authority to designate ETCs.

Chapter 30 Broadband

Act 183 of 2004 also addressed balancing the mandated deployment of broadband facilities without jeopardizing the provision of Universal Service. By this act, all ILECs were required to provide 100 percent broadband availability to their retail access lines by Dec. 31, 2015.

In 2017, the Commission published the Pennsylvania Broadband Bill of Rights to help educate consumers of their right to broadband under Pennsylvania law. Specifically, Pennsylvania consumers have the right to service within 10 days of the request for broadband service and the service must meet the following speed requirements:

- 1.544 megabits per second (Mbps) download
- 0.128 Mbps upload

The Pennsylvania Broadband Bill of Rights directed consumers to contact BCS if their local phone company could not provide broadband or the service provided did not meet Pennsylvania requirements.

During 2017, BCS began tracking broadband complaints. The following table shows the total number of residential informal complaints for each of the five major telephone companies, compared to the number of complaints that included a dispute regarding broadband speed, access or availability.

2017 Chapter 30 Broadband Complaints
Residential Informal Complaints (Consumer Complaints and PARs)
Major Local Telephone Companies

Company	Total Number of Complaints	Total Number of Complaints with a Broadband Component	% of Complaints with a Broadband Component
CenturyLink	97	11	11%
Frontier Commonwealth	121	25	21%
Verizon North	52	8	15%
Verizon PA	915	89	10%
Windstream	150	28	19%
Total	1,335	161	12%

- Overall, 12 percent of the residential informal complaints for the major telephone companies had a broadband component.

Glossary of Terms

Broadband - A communication channel using any technology and having a bandwidth equal to or greater than 1.544 Mbps in the downstream direction and equal to or greater than 0.128 Mbps in the upstream direction.

Competitive Local Exchange Carrier (CLEC) - A telecommunications provider that competes with other already established telecommunications providers to provide local telephone service.

Consumer Complaint Rate - The number of consumer complaints per 1,000 residential customers.

Consumer Complaints - Cases to BCS involving billing, service, rates and other issues not related to requests for payment terms.

Cramming - The submission or inclusion of unauthorized, misleading or deceptive charges for products or services on an end-user customer's local telephone bill.

Customer Assistance Programs (CAPs) - Alternative collection programs set up between a utility company and a customer that allow low-income, payment-troubled customers to pay utility bills that are based on household size and gross household income. CAP participants agree to make regular monthly payments, which are usually less than the current bill, in exchange for continued utility service.

Electric Distribution Company (EDC) - Owner of the power lines and equipment necessary to deliver purchased electricity to the customer.

Electric Generation Supplier (EGS) - A person or corporation, generator, broker, marketer, aggregator or other entity that sells electricity, using the transmission or distribution facilities of an EDC.

Hardship Funds - Utility-sponsored funds that provide cash assistance to low-income utility customers to help them pay their utility bills.

Incumbent Local Exchange Carrier (ILEC) - A telecommunications company that was providing local telephone service in 1996 to customers in a specific geographic area designated by the Federal Communications Commission and held a certificate from the PUC.

Infraction - A misapplication or infringement of a Commission statute or regulation, particularly the standards and billing practices for residential utility service.

Infraction Rate - The number of informally verified infractions per 1,000 residential customers (includes infractions drawn from both consumer complaints and PARs).

Inquiries - Consumer contacts to BCS that, for the most part, require no follow-up investigation beyond the initial contact.

Justified Consumer Complaint Rate - The number of justified consumer complaints per 1,000 residential customers.

Justified Payment Arrangement Request Rate - The number of justified PARs per 1,000 residential customers.

Local Exchange Carrier (LEC) - A public utility that provides basic telephone service. The term does not exclude the utility's provision of toll service in addition to basic service.

Natural Gas Distribution Company (NGDC) - A natural gas utility regulated by the PUC that owns the gas lines and equipment necessary to deliver natural gas to the consumer.

Natural Gas Supplier (NGS) - An entity other than an NGDC that sells, or arranges to sell, natural gas to customers using the distribution lines of an NGDC.

Payment Arrangement Request Rate - The number of PARs per 1,000 residential customers.

Payment Arrangement Requests (PARs) - Consumer requests for payment arrangements principally include contacts to BCS involving a request for payment terms in one of the following situations: suspension/termination of service is pending; service has been suspended/terminated and the customer needs payment terms to have service restored; or the customer wants to retire an arrearage.

Problem Categories - A breakdown of residential consumer complaints by specific problem categories such as billing, credit and deposits, service quality, rates, etc.

Response Time in Days - Response time is the time span in days from the date of BCS's first contact with the company regarding a complaint to the date on which the utility provides BCS with its report regarding the complaint. Response time quantifies the speed of a utility's response to BCS consumer complaints and PARs.

Slamming - The unauthorized switching of a customer's service provider. In telecommunications, slamming refers to changing a customer's local exchange carrier or primary long-distance service provider without the customer's consent. In electric and gas, slamming refers to changing the customer's supply provider without customer authorization.

Termination Rate - For the electric and gas industries, termination rate is the number of service terminations divided by the number of residential customers. For the telephone industry, termination rate is the number of service terminations per 1,000 residential customers.

Appendices

Appendix A

Consumer Ratings of BCS Service

How quickly did the PUC handle your request?		
	2016	2017
Very quickly	54%	42%
Fairly quickly	27%	35%
Not very quickly	8%	11%
Not at all quickly	9%	9%
Don't recall	1%	2%
Have not heard from PUC	2%	1%
How easy to understand was the information the PUC gave you about the outcome of the problem?		
	2016	2017
Very easy	53%	47%
Fairly easy	20%	19%
Not very easy	3%	4%
Not at all easy	2%	2%
Don't recall	3%	4%
Did not receive any information	19%	24%
How polite was the first person you talked with at the PUC?		
	2016	2017
Very polite	76%	76%
Fairly polite	15%	15%
Not very polite	3%	2%
Not at all polite	2%	1%
Don't recall	1%	1%
Did not speak to anyone	4%	5%
How interested in helping you was the first person you talked with at the PUC?		
	2016	2017
Very interested	69%	66%
Fairly interested	19%	21%
Not very interested	4%	6%
Not at all interested	4%	3%
Don't recall	1%	1%
Did not speak to anyone	2%	3%
If you had another problem with a utility, would you contact the PUC again?		
	2016	2017
Yes	85%	81%
No	6%	9%
Not sure	9%	10%

Appendix B

Total Volume of Consumer Complaints and Payment Arrangement Requests to BCS in 2016-17

Industry	Consumer Complaints						Payment Arrangement Requests					
	Residential			Commercial			Residential			Commercial		
	2016	2017	Percent Change	2016	2017	Percent Change	2016	2017	Percent Change	2016	2017	Percent Change
Electric	5,890	8,038	36%	405	424	5%	34,812	29,942	-14%	237	128	-46%
Gas	1,566	2,126	36%	89	127	43%	13,796	12,399	-10%	73	44	-40%
Water	714	873	22%	39	49	26%	3,864	3,543	-8%	26	14	-46%
Telephone	1,470	1,398	-5%	192	179	-7%	81	60	-26%	4	3	-25%
Other*	3	1	-67%	0	0	0%	5	3	-40%	0	0	0%
Total	9,643	12,436	29%	725	779	7%	52,558	45,947	-13%	340	189	-44%

* Sewer and steam heat complaints are designated as “other.”

Appendix C

2017 Residential Informal Complaints (Consumer Complaints and PARs) for Companies Not Included in Industry Chapters

Company*	Number of Complaints	Total Number of Complaints Includes Secondary Company Complaints **
ELECTRIC		
Pike County Light and Power (EDC)	7	7
Wellsboro Electric Co. (EDC)	0	5
Other Electric Distribution Companies (EDCs)***	12	8
4 Choice Energy (EGS)	20	24
AEP Energy (EGS)	16	29
Agway Energy Services (EGS)	0	8
Alpha Gas & Electric (EGS)	9	9
Ambit Energy (EGS)	22	32
American Power & Gas of PA (EGS)	53	72
AP Gas and Electric (EGS)	27	36
Astral Energy (EGS)	5	6
Cirro Energy (EGS)	0	6
Clean Choice Energy (EGS)	8	12
Clearview Electric (EGS)	20	29
Con Edison Solutions (EGS)	0	5
Constellation Energy Power Choice (EGS)	0	10
Discount Power (EGS)	11	14
Elec-Direct Energy Services (EGS)	49	74
Eligo Energy PA (EGS)	70	85
Energy Plus Holdings (EGS)	12	18
Energy Rewards/Comcast/Everyday Energy (EGS)	7	8

*Only those non-major companies having five or more complaints in 2017 are listed individually. Non-major companies having less than five residential complaints in 2017 are included in the appropriate general category for their industry, i.e. "Other Electric Distribution Companies" or "Other CLECs," etc.

** Includes complaints where the non-major company is listed as the secondary company.

*** Total number of complaints for those companies having fewer than five residential complaints. See the last table in Appendix C for a list of these companies.

Appendix C (Continued)

2017 Residential Informal Complaints (Consumer Complaints and PARs) for Companies Not Included in Industry Chapters

Company*	Number of Complaints	Total Number of Complaints Includes Secondary Company Complaints **
ELECTRIC (continued)		
First Energy Solutions (EGS)	13	28
Frontier Utilities Northeast (EGS)	46	61
Great American Power (EGS)	10	13
Green Mountain Energy (EGS)	42	60
IDT Energy (EGS)	28	41
Inspire Energy Holdings (EGS)	23	25
Interstate Gas Supply (EGS)	19	28
Just Energy PA (EGS)	8	10
Liberty Power (EGS)	9	12
Life Energy (EGS)	49	58
National Gas and Electric (EGS)	34	40
New Energy Ventured - Mid Atlantic (EGS)	14	25
Nextera Energy Service PA (EGS)	20	26
North American Power and Gas (EGS)	68	84
NRG Solutions (EGS)	82	109
Oasis Energy (EGS)	104	119
Palmco Power PA (EGS)	14	21
Park Power (EGS)	39	48
Pennsylvania Gas and Electric (EGS)	97	115
Planet Energy PA (EGS)	56	67
Public Power (EGS)	21	29

*Only those non-major companies having five or more complaints in 2017 are listed individually. Non-major companies having less than five residential complaints in 2017 are included in the appropriate general category for their industry, i.e. "Other Electric Distribution Companies" or "Other CLECs," etc.

** Includes complaints where the non-major company is listed as the secondary company.

*** Total number of complaints for those companies having fewer than five residential complaints. See the last table in Appendix C for a list of these companies.

Appendix C (Continued)

2017 Residential Informal Complaints (Consumer Complaints and PARs) for Companies Not Included in Industry Chapters

Company*	Number of Complaints	Total Number of Complaints Includes Secondary Company Complaints **
ELECTRIC (continued)		
Residents Energy (EGS)	11	18
Respond Power (EGS)	97	116
RPA Energy (EGS)	12	15
Rushmore Energy (EGS)	6	11
SFE Energy (EGS)	58	77
Shipleigh Oil Company (EGS)	5	8
Smartenergy.com (EGS)	18	22
Spark Energy (EGS)	36	44
Sperian Energy (EGS)	66	78
Star Energy Partners (EGS)	0	10
Starion Energy of PA (EGS)	24	32
Stream Energy (EGS)	33	43
Sunwave Power & Gas PA (EGS)	0	8
Talen Energy (EGS)	6	15
Think Energy/Engie Retail (EGS)	43	49
Titan Gas and Power (EGS)	49	63
Town Square Energy East (EGS)	15	18
TriEagle Energy (EGS)	13	15
Verde Energy USA (EGS)	25	46

*Only those non-major companies having five or more complaints in 2017 are listed individually. Non-major companies having less than five residential complaints in 2017 are included in the appropriate general category for their industry, i.e. "Other Electric Distribution Companies" or "Other CLECs," etc.

** Includes complaints where the non-major company is listed as the secondary company.

*** Total number of complaints for those companies having fewer than five residential complaints. See the last table in Appendix C for a list of these companies.

Appendix C (Continued)

2017 Residential Informal Complaints (Consumer Complaints and PARs) for Companies Not Included in Industry Chapters

Company*	Number of Complaints	Total Number of Complaints Includes Secondary Company Complaints **
Viridian Energy (EGS)	0	7
Vista Energy Marketing (EGS)	36	38
WGL Energy Services (EGS)	7	8
Xoom Energy PA (EGS)	19	24
YEP Energy (EGS)	6	7
Other Electric Generation Suppliers (EGSs)***	57	36
Total Non-Major Electric	1,786	2,324
GAS		
Peoples Gas Co. f/k/a Peoples TWP (NGDC)	168	168
UGI Central Penn Gas (NGDC)	302	307
Other Natural Gas Distribution Companies (NGDCs)***	5	5
Dominion Energy Solutions (NGS)	22	29
Major Energy (NGS)	20	23
North American Power & Gas (NGS)	5	7
NRG Home (NGS)	8	9
Pennsylvania Gas and Electric (NGS)	25	29
SFE Energy (NGS)	6	7
Shipley Energy (NGS)	9	11
Other Natural Gas Suppliers (NGSs)***	30	39
Total Non-Major Gas	600	634

*Only those non-major companies having five or more complaints in 2017 are listed individually. Non-major companies having less than five residential complaints in 2017 are included in the appropriate general category for their industry, i.e. "Other Electric Distribution Companies" or "Other CLECs," etc.

** Includes complaints where the non-major company is listed as the secondary company.

*** Total number of complaints for those companies having fewer than five residential complaints. See the last table in Appendix C for a list of these companies.

Appendix C (Continued)

2017 Residential Informal Complaints (Consumer Complaints and PARs) for Companies Not Included in Industry Chapters

Company*	Number of Complaints
WATER	
Community Utilities PA (WP)	8
Imperial Point Water (WP)	5
Rock Springs Water (WP)	8
Other Private Water***	15
City of Bethlehem (WM)	9
City of Lancaster (WM)	5
City of Philadelphia (WM)	9
Municipal Water***	9
Total Non-Major Water	68

*Only those non-major companies having five or more complaints in 2017 are listed individually. Non-major companies having less than five residential complaints in 2017 are included in the appropriate general category for their industry, i.e. "Other Electric Distribution Companies" or "Other CLECs," etc.

** Includes complaints where the non-major company is listed as the secondary company.

*** Total number of complaints for those companies having fewer than five residential complaints. See the last table in Appendix C for a list of these companies.

Appendix C (Continued)

2017 Residential Informal Complaints (Consumer Complaints and PARs) for Companies Not Included in Industry Chapters

Company*	Number of Complaints
TELEPHONE	
Frontier Communications ILEC Group	7
Other Incumbent Local Exchange Carriers (ILECs)***	4
AT&T Local (CLEC)	7
Frontier Communications CTSI (CLEC)	9
Full Service Network (CLEC)	5
Other Competitive Local Exchange Carriers (CLECs)***	3
AT&T (IXC)	5
Atlantic Broadband	5
Budget Prepay	5
QLink Wireless	7
RCN Telecom Services of PA (IXC & CLEC)	8
Virgin Mobile	15
Tracfone (wireless)	14
Other Providers of Telecommunications Services***	29
Total Non-Major Telephone	123

*Only those non-major companies having five or more complaints in 2017 are listed individually. Non-major companies having less than five residential complaints in 2017 are included in the appropriate general category for their industry, i.e. "Other Electric Distribution Companies" or "Other CLECs," etc.

** Includes complaints where the non-major company is listed as the secondary company.

*** Total number of complaints for those companies having fewer than five residential complaints. See the last table in Appendix C for a list of these companies.

Appendix C (Continued)

2017 Residential Informal Complaints (Consumer Complaints and PARs) for Companies Not Included in Industry Chapters

Companies with Less Than Five Residential Complaints
ELECTRIC
<u>Other EDCs</u> : Borough of Schuylkill Haven, Citizens Electric Co. of Lewisburg and Duncannon Electric,
<u>Other EGSs</u> : Amerigreen Energy, Aspiry Energy, Aspiry Energy Mid-States, Champion Energy Services, Choose Energy, Comperio Energy, Exelon, Gateway Energy, Greenlight Energy, Josco Energy USA, Just Energy Solutions, National Choice Energy, Patriot Energy Group, PSEG Energy Solutions, Santanna Energy Services, UGI Energy Services and Vcharge Inc.
GAS
<u>Other NGDCs</u> : Mountain Energy, Northeast Heat & Light, Riemer Natural Gas and Valley Energy
<u>Other NGSSs</u> : Agway Energy Services, Ambit Northeast, American Power & Gas of PA, Constellation Energy Gas Choice, Direct Energy Services, Eligo Energy PA, IGS Energy, Novec Energy Solutions, Oasis Power, Palmco Energy PA, Planet Energy, RPA Energy, Star Energy Partners, Stream Energy, Think Energy, Titan Gas & Power, UGI Energy Service – Energylink, Verde Energy USA PA, Xoom Energy PA and Yep Energy
WATER
<u>Other Private Water</u> : Bethel Township Water, Blue Knob Water, Cooperstown Water, Finch Hill Water Co., Hidden Valley Utility Services, PA Utility Co., Reynolds Water, Twin Lakes Water and Winola Water Co.
<u>Municipal Water</u> : Borough of Fairchance, Borough of Quakertown, City of Erie and Hanover Water Works
TELEPHONE
<u>Other ILECs</u> : Armstrong Telephone Co., Consolidated Communications of PA, Fairpoint Communications, TDS Telecom and United Telephone
<u>Other CLECs</u> : Birch Communications, Clear Rate Communications, North-East PA Telephone, North Penn Telephone, Service Electric Telephone, Talk America and Talk America Services
<u>Other Providers of Telecommunications Services</u> : Budget Prepay, Comcast Digital Phone, Iwireless, LDDS Communications, T-Mobile and Telrite

Appendix D-1

Classification of Consumer Complaints

Electric, Gas & Water

Billing Disputes - Complaints about bills from the utility: high bills, inaccurate bills or balances, installation charges, customer charges, service charges, repair charges, late payment charges, frequency of bills and the misapplication of payment on bills.

Competition - Complaints about issues that are directly related to competition: enrollment/eligibility, application and licensing, supplier selection, changing/switching suppliers (includes slamming), advertising and sales, billing, contracts and credit and deposits. This category also includes any complaints about more general competition issues such as consumer education, pilot programs and restructuring.

Credit & Deposits - Complaints about a company's requirements to provide service: the applicant must pay another person's bill; the applicant must complete an application; the applicant must provide identification; or the applicant must pay a security deposit. This category also includes complaints about the amount of or the amortization of a deposit, the payment of interest on a deposit or the failure of a company to return a deposit to the customer.

Damages - Complaints about a company's lack of payment or lack of restored property related to damages to equipment, appliances or property due to service outages, company construction or repair, and improperly delivered or transferred service.

Discontinuance/Transfer - Complaints related to the responsibility for or the amount of bills after discontinuance or transfer of service: the customer requested discontinuance of service and the company failed to finalize the account as requested or transferred a balance to a new or existing account from the account of another person or location.

Metering - Billing complaints directly related to the reading of or the failure to read the customer's meter and the accuracy of the meter readings (company reading, customer supplied reading or misreading).

Other Payment Issues - Complaints about the amount of budget bills or the transfer of a customer's debt to a collection agency.

Personnel Problems - Complaints about performance by company personnel: a company representative did not finish the job correctly; a meter reader entered a customer's home to read the meter without knocking; company personnel will not perform a requested service; business office personnel treated the customer rudely; and the utility mismanaged its operations. This category also includes any complaints about sales such as appliance sales by the utility, as well as complaints about a company's CAP program or procedures.

Rates - General or specific complaints about a utility's rates: general or specific rates are too high; the company's rates are being used to recover advertising costs; or the customer is being billed on the incorrect rate.

Scheduling Delays - Complaints about problems with a company's scheduling: delays in scheduling or repairing service or relocating poles, failures to keep scheduled meetings or appointments and lack of accessibility to customers.

Service Extensions - Complaints about line extensions or installation of service: the responsibility for line extensions, the cost and payment for line extensions, inspection requirements, delay in installation, connection or disconnection of service and denial of service extensions.

Service Interruptions - Complaints about service interruptions: the frequency of service interruptions, the duration of interruptions or the lack of prior notice regarding interruptions.

Service Quality - Complaints about a utility's product: the quality of the product is poor (water quality, voltage or pressure); the company's equipment is unsatisfactory or unsafe; the company fails to act on a complaint about safety; the company plans to abandon service; the company does not offer needed service; the company wants to change location of equipment; or the company providing service is not certified by the Commission (defectos).

Termination or PAR Procedures - Complaints about termination and/or payment arrangement procedures: the customer claims no termination notice was received; the company failed to honor a medical certificate; or there was a delay in reconnection after the bill was paid.

All Other Problems - All other complaints that do not fit into the above categories, including, but not limited to, credit application procedures.

Appendix D-2

Classification of Consumer Complaints

Telephone

Annoyance Calls - Complaints about the company's failure to resolve problems related to receiving unsolicited sales calls or harassing calls. This includes the company's failure to change the phone number or initiate an investigation and problems with auto dialers and fax machines.

Billing Disputes - Complaints about bills from the utility: high bills, inaccurate bills or balances, installation charges, customer charges, service charges, repair charges, late payment charges, frequency of bills and the misapplication of payment on bills.

Competition - Complaints about changing/switching service providers, slamming, cramming, competition-related billing problems, contracts, competition-related service problems and all other problems associated with competition in the telecommunications marketplace.

Credit & Deposits - Complaints about a company's requirements to provide service: applicant payment of another person's bill, completion of an application, provision of identification or payment of a security deposit. This category also includes complaints about the amount of or the amortization of a deposit, the payment of interest on a deposit or the failure of a company to return a deposit to the customer.

Discontinuance/Transfer - Complaints related to responsibility for or the amount of bills after discontinuance or transfer of service; company failure to finalize the account as requested; or the company's transfer of a balance to a new or existing account from the account of another person or location.

Non-Recurring Charges - Complaints about one-time charges for installation of basic &/or non-basic services.

Service Delivery - Complaints about delays in service installations or disconnections of service and failures to keep scheduled appointments, lack of facilities to provide service, unauthorized transfer of service, unavailability of special services and the rudeness of business office personnel.

Service Terminations - Complaints about suspension or termination procedures when there is no need for a payment agreement.

Toll Services - Complaints about charges for local toll &/or long-distance toll services.

Unsatisfactory Service - Complaints about poor service quality, problems with the assignment of phone numbers, incorrect information in phone directories, lack of directories, equal access to toll network and service interruptions and outages.

All Other Problems - All other complaints that do not fit into the above categories, including complaints about audiotex (special phone entertainment or information services), excessive coin-phone rates, extended area of service (limited local calling area), rates (general or specific rates are too high or the customer is being billed on the incorrect rate) and sales of non-basic service (including the availability of certain services). Also included are complaints that were taken in by BCS but closed before they could be investigated because the consumer resolved the complaint with the company or because the consumer changed their mind about filing the complaint. In addition, some complaints, during investigation, were found to not fall under the PUC's jurisdiction.

Appendix E - Table 1

Consumer Complaint Categories: 2017* Major Electric Distribution Companies

Categories**	Duquesne	Met-Ed ***	PECO ***+	Penelec ***	Penn Power	PPL ***	UGI- Electric	West Penn***	Electric Total
Billing Disputes	92	91	88	98	44	94	9	81	597
Termination or PAR Procedures	71	63	100	56	21	112	7	41	471
Personnel Problems	72	51	70	54	27	59	3	57	393
Credit and Deposits	30	62	59	57	37	13	6	39	303
Metering	31	76	8	66	5	32	0	70	288
Other Payment Issues	36	19	39	22	12	38	1	21	188
Discontinuance/Transfer	41	21	28	16	13	40	3	17	179
Service Interruptions	19	16	6	27	10	8	0	42	128
Damages	3	12	11	17	7	17	1	34	102
Service Quality	9	12	12	11	4	14	1	24	87
Scheduling Delays	1	9	4	9	2	4	1	8	38
Service Extensions	1	6	2	2	3	3	1	9	27
Rates	0	5	0	10	1	3	0	5	24
All Other Problems	7	4	8	6	1	3	0	5	34
Total	413	447	435	451	187	440	33	453	2,859

* Categories are for residential complaints opened in 2017 and evaluated by BCS as of June 8, 2018.

** An explanation of the various complaint categories appears in Appendix D-1.

*** Statistics are based on a probability sample of cases.

+ PECO statistics include electric and gas.

Appendix E - Table 2

Consumer Complaint Categories: 2017*

Major Natural Gas Distribution Companies

Categories**	Columbia	NFG	Peoples	Peoples-Equitable	PGW***	UGI-Gas	UGI Penn Natural	Gas Total
Personnel Problems	29	15	25	37	79	33	11	229
Billing Disputes	29	12	25	13	93	21	17	210
Termination or PAR Procedures	11	12	27	20	69	30	16	185
Discontinuance/Transfer	7	6	8	6	67	11	10	115
Other Payment Issues	6	8	10	5	39	7	9	84
Metering	1	12	10	2	32	7	2	66
Damages	2	4	7	5	15	9	6	48
Scheduling Delays	2	3	11	10	5	8	6	45
Service Quality	2	5	8	9	8	6	4	42
Credit and Deposits	5	2	4	0	11	4	4	30
Service Extensions	6	4	3	3	2	4	4	26
Service Interruptions	1	0	1	2	0	0	2	6
Rates	3	0	0	0	1	0	0	4
All Other Problems	2	2	0	0	7	2	1	14
Total	106	85	139	112	428	142	92	1,104

* Categories are for residential complaints opened in 2017 evaluated by BCS as of June 8, 2018.

** An explanation of the various complaint categories appears in Appendix D-1.

*** Statistics are based on a probability sample of cases.

Appendix E - Table 3

Consumer Complaint Categories: 2017* Major Water Companies

Categories**	Aqua	PAWC	Large Class A Total	Audubon	Columbia	Newtown Artesian	SUEZ Bethel	SUEZ PA	York	"Other Class A" Total	All Class A Water Total
Billing Disputes	84	134	218	0	2	0	0	5	4	11	229
Termination or PAR Procedures	35	54	89	0	0	0	0	1	4	5	94
Metering	34	20	54	0	0	0	0	3	3	6	60
Service Quality	15	22	37	0	1	0	0	11	0	12	49
Discontinuance/Transfer	17	18	35	0	0	0	0	1	1	2	37
Damages	7	20	27	0	0	0	0	1	1	2	29
Personnel Problems	11	14	25	0	0	0	0	3	0	3	28
Service Interruptions	1	14	15	0	0	0	0	1	0	1	16
Credit and Deposits	11	3	14	0	0	0	0	0	1	1	15
Other Payment Issues	2	13	15	0	0	0	0	0	0	0	15
Service Extensions	2	4	6	0	0	0	0	0	0	0	6
Rates	1	1	2	0	0	0	0	0	0	0	2
Scheduling Delays	1	0	1	0	0	0	0	0	0	0	1
All Other Problems	0	3	3	0	0	0	0	0	0	0	3
Total	221	320	541	0	3	0	0	26	14	43	584

* Categories are for residential complaints opened in 2017 and evaluated by BCS as of June 8, 2018.

** An explanation of the various complaint categories appears in Appendix D-1.

Appendix E - Table 4

Consumer Complaint Categories: 2017* Major Local Telephone Companies

Categories**	CenturyLink	Frontier Common-wealth	Verizon North	Verizon PA***	Windstream	Telephone Total
Unsatisfactory Service	41	56	27	248	85	457
Billing Disputes	11	9	6	49	7	82
Service Delivery	3	8	2	27	9	49
Service Terminations	3	3	1	7	0	14
Competition	0	2	0	5	2	9
Discontinuance/Transfer	0	3	1	3	0	7
Annoyance Calls	0	0	0	3	2	5
Non-Recurring Charges	1	2	0	0	0	3
Toll Services	1	0	0	1	1	3
Credit and Deposits	0	1	0	1	0	2
All Other Problems	18	11	9	116	15	169
Total	78	95	46	460	121	800

* Categories are for residential complaints opened in 2017 and evaluated by BCS as of June 8, 2018.

** An explanation of the various complaint categories appears in Appendix D-2.

*** Statistics are based on a probability sample of cases.

Appendix F - Table 1

2016-17 Residential Consumer Complaint Statistics Major Electric Distribution Companies

Company Name	2017 Residential Customers	Residential Consumer Complaints to BCS			Consumer Complaint Rates ¹		Justified Consumer Complaints			
		2016	2017	% Change in #	2016	2017	Numbers ² / Rates ³ 2016		Numbers ² / Rates ³ 2017	
Duquesne	532,204	590	583	-1%	1.12	1.10	46	0.09	41	0.08
Met-Ed	499,192	747	1,093	46%	1.51	2.19	86*	0.17*	132*	0.26*
PECO ⁵	1,478,817	929	1,308	41%	0.63	0.88	78*	0.05*	69*	0.05*
Penelec	501,533	677	1,014	50%	1.35	2.02	77*	0.15*	128*	0.26*
Penn Power	144,286	323	230	-29%	2.25	1.59	32	0.22	26	0.18
PPL	1,223,076	617	1,057	71%	0.50	0.86	52*	0.04*	84*	0.07*
UGI-Electric	55,648	36	39	8%	0.65	0.70	1	0.02	5	0.09
West Penn	624,914	803	1,120	39%	1.29	1.79	92*	0.15*	127*	0.20*
Total	5,059,670	4,722	6,444	36%			464		609	
Average of Rates					1.24⁴	1.49⁴		0.13⁴		0.16⁴

¹ Consumer complaint rate = consumer complaints per 1,000 residential customers.

² Estimated based on the number of cases in CSIS as of June 8, 2018.

³ Justified consumer complaint rate = justified consumer complaints per 1,000 residential customers.

⁴ Does not include UGI-Electric.

⁵ PECO statistics include electric and gas.

* Based on a probability sample of cases.

Appendix F - Table 2

2016-17 Residential Consumer Complaint Statistics Major Natural Gas Distribution Companies

Company Name	2017 Residential Customers	Residential Consumer Complaints to BCS			Consumer Complaint Rates ¹		Justified Consumer Complaints			
		2016	2017	% Change in #	2016	2017	Numbers ² / Rates ³ 2016		Numbers ² / Rates ³ 2017	
Columbia	393,410	126	179	42%	0.32	0.45	8	0.02	3	0.01
NFG	196,950	54	112	107%	0.27	0.57	3	0.02	7	0.04
Peoples	333,761	159	206	30%	0.48	0.62	6	0.02	1	0.00
Peoples-Equitable	247,930	118	150	27%	0.48	0.61	9	0.04	3	0.01
PGW	474,960	776	980	26%	1.64	2.06	173*	0.37*	66*	0.14*
UGI-Gas	352,720	130	178	37%	0.38	0.50	6	0.02	9	0.03
UGI Penn Natural	154,319	76	110	45%	0.50	0.71	5	0.03	6	0.04
Total	2,154,050	1,439	1,915	33%			210		95	
Average of Rates					0.58	0.79		0.07		0.04

¹ Consumer complaint rate = consumer complaints per 1,000 residential customers.

² Estimated based on the number of cases in CSIS as of June 8, 2018.

³ Justified consumer complaint rate = justified consumer complaints per 1,000 residential customers.

* Based on a probability sample of cases.

Appendix F - Table 3

2016-17 Residential Consumer Complaint Statistics Major Water Companies

Company Name	2017 Residential Customers	Residential Consumer Complaints to BCS			Consumer Complaint Rates ¹		Justified Consumer Complaints			
		2016	2017	% Change in #	2016	2017	Numbers ² / Rates ³ 2016		Numbers ² / Rates ³ 2017	
Aqua	398,536	207	255	23%	0.52	0.64	45	0.11	76	0.19
PAWC	606,453	420	542	29%	0.70	0.89	72	0.12	85	0.14
Large Class A Total	1,004,989	627	797	27%			117		161	
Large Class A Average of Rates					0.61	0.77		0.12		0.17
Audubon	2,560	3	0	-100%	1.15	0.00	2	0.77	0	0.00
Columbia	9,597	3	3	0%	0.32	0.31	0	0.00	0	0.00
Newtown Artesian	9,573	1	0	-100%	0.10	0.00	0	0.00	0	0.00
SUEZ Bethel	2,215	0	0	0%	0.00	0.00	0	0.00	0	0.00
SUEZ PA	49,878	31	27	-13%	0.58	0.54	2	0.04	1	0.02
York	60,957	23	15	-35%	0.38	0.25	1	0.02	0	0.00
“Other Class A” Total	134,780	61	45	-26%			5		1	
“Other Class A” Avg. of Rates⁴					0.44	0.33		0.04		0.01
All Class A Total	1,139,769	688	842	22%			122		162	
All Class A Average of Rates⁵					0.56	0.62		0.09		0.11

¹ Consumer complaint rate = consumer complaints per 1,000 residential customers.

² Estimated based on the number of cases in CSIS as of June 8, 2018.

³ Justified consumer complaint rate = justified consumer complaints per 1,000 residential customers.

⁴ Calculated based on the rate of “Other Class A” companies as a whole.

⁵ Calculated based on the rates of Aqua, PAWC and “Other Class A” companies as a whole.

Appendix F - Table 4

2016-17 Residential Consumer Complaint Statistics Major Local Telephone Companies

Company Name	2017 Residential Customers	Residential Consumer Complaints to BCS			Consumer Complaint Rates ¹		Justified Consumer Complaints			
		2016	2017	% Change in #	2016	2017	Numbers ² / Rates ³ 2016		Numbers ² / Rates ³ 2017	
CenturyLink	127,513	62	92	48%	0.48	0.72	29	0.23	39	0.31
Frontier Commonwealth	95,148	85	113	33%	0.84	1.19	47	0.46	74	0.78
Verizon North	128,380	68	52	-24%	0.45	0.41	37	0.25	20	0.16
Verizon PA	626,927	1,070	877	-18%	1.43	1.40	366*	0.49*	379	0.60
Windstream	83,700	92	144	57%	1.01	1.72	63	0.69	99	1.18
Total	1,061,668	1,377	1,278	-7%			542		611	
Average of Rates					0.84	1.09		0.42		0.61

¹ Consumer complaint rate = consumer complaints per 1,000 residential customers.

² Estimated based on the number of cases in CSIS as of June 8, 2018.

³ Justified consumer complaint rate = justified consumer complaints per 1,000 residential customers.

* Based on a probability sample of cases.

Appendix G - Table 1

2016-17 Residential Payment Arrangement Request (PAR) Statistics Major Electric Distribution Companies

Company Name	2017 Residential Customers	Residential PARs to BCS			PAR Rates ¹		Justified PARs			
		2016	2017	% Change In #	2016	2017	Numbers ² / Rates ³ 2016		Numbers ² / Rates ³ 2017	
Duquesne	532,204	2,284	1,784	-22%	4.34	3.35	120	0.23	125	0.23
Met-Ed	499,192	4,433	3,706	-16%	8.94	7.42	503	1.01	500	1.00
PECO ⁵	1,478,817	6,034	5,831	3%	4.12	3.94	410	0.28	605	0.41
Penelec	501,533	4,644	4,042	-13%	9.25	8.06	458	0.91	446	0.89
Penn Power	144,286	1,575	1,169	-26%	10.97	8.10	140	0.98	131	0.91
PPL	1,223,076	11,528	9,445	-18%	9.36	7.72	831	0.67	1,149	0.94
UGI-Electric	55,648	540	348	-36%	9.68	6.25	35	0.63	30	0.54
West Penn	624,914	3,254	3,425	5%	5.22	5.48	208	0.33	234	0.37
Total	5,059,670	34,292	29,750	-13%			2,705		3,220	
Average of Rates					7.46⁴	6.30⁴		0.63⁴		0.68⁴

¹ PAR rate = PARs per 1,000 residential customers.

² With the exception of UGI-Electric, each company's number of justified PARs is estimated based on a probability sample of cases. The number of justified PARs for all EDCs is based on the number of cases in CSIS as of June 8, 2017.

³ Justified PAR rate = justified PARs per 1,000 residential customers.

⁴ Does not include UGI-Electric.

⁵ PECO statistics include electric and gas.

Appendix G - Table 2

2016-17 Residential Payment Arrangement Request (PAR) Statistics Major Natural Gas Distribution Companies

Company Name	2017 Residential Customers	Residential PARs to BCS			PAR Rates ¹		Justified PARs			
		2016	2017	% Change in #	2016	2017	Numbers ² / Rates ³ 2016		Numbers ² / Rates ³ 2017	
Columbia	393,410	684	553	-19%	1.75	1.41	12	0.03	6	0.02
NFG	196,950	332	540	63%	1.68	2.74	13	0.07	21	0.11
Peoples	333,761	698	661	-5%	2.10	1.98	16	0.05	23	0.07
Peoples-Equitable	247,930	445	524	18%	1.83	2.11	31	0.13	22	0.09
PGW	474,960	7,558	7,701	2%	15.98	16.21	293*	0.62*	381*	0.80*
UGI-Gas	352,720	2,182	1,310	-40%	6.31	3.71	129*	0.37*	98*	0.28*
UGI Penn Natural	154,319	1,358	721	-47%	8.89	4.67	143*	0.94*	43	0.28
Total	2,154,050	13,257	12,010	-9%			637		594	
Average of Rates					5.51	4.69		0.31		0.23

¹ PAR rate = PARs per 1,000 residential customers.

² The number of justified PARs for all NGDCs is based on the number of cases in CSIS as of June 8, 2018.

³ Justified PAR rate = justified PARs per 1,000 residential customers.

* Estimated based on a probability sample of cases.

Appendix G - Table 3

2016-17 Residential Payment Arrangement Request (PAR) Statistics Major Water Companies

Company Name	2017 Residential Customers	Residential PARs to BCS			PAR Rates ¹		Justified PARs			
		2016	2017	% Change in #	2016	2017	Numbers ² / Rates ³ 2016		Numbers ² / Rates ³ 2017	
Aqua	398,536	701	639	-9%	1.77	1.60	43	0.11	52	0.13
PAWC	606,453	2,907	2,687	-8%	4.85	4.43	359*	0.60*	463*	0.76*
Large Class A Total	1,004,989	3,608	3,326	-8%			402		515	
Large Class A Average of Rates					3.31	3.02		0.35		0.45
Audubon	2,560	0	1	n/a	0.00	0.39	0	0.00	0	0.00
Columbia	9,597	30	29	-3%	3.16	3.02	0	0.00	0	0.00
Newtown Artesian	9,573	0	1	n/a	0.00	0.10	0	0.00	0	0.00
SUEZ Bethel	2,215	0	0	0%	0.00	0.00	0	0.00	0	0.00
SUEZ PA	49,878	84	51	-39%	1.56	1.02	2	0.04	4	0.08
York	60,957	106	98	-8%	1.77	1.61	5	0.08	0	0.00
“Other Class A” Total	134,780	220	180	-18%			7		4	
“Other Class A” Avg. of Rates⁴					1.60	1.34		0.06		0.03
All Class A Total	1,139,769	3,828	3,506	-8%			409		519	
All Class A Average of Rates⁵					2.74	2.46		0.26		0.31

¹ PAR rate = PARs per 1,000 residential customers.

² Estimated based on a probability sample of cases and the number of cases in CSIS as of June 8, 2018.

³ Justified PAR rate = justified PARs per 1,000 residential customers.

⁴ Calculated based on the rate of “Other Class A” companies as a whole.

⁵ Calculated based on the rates of Aqua, PAWC and “Other Class A” companies as a whole.

* Based on a probability sample of cases.

Appendix G - Table 4

2016-17 Residential Payment Agreement Request (PAR) Statistics Major Local Telephone Companies

Company Name	2017 Residential Customers	Residential PARs to BCS			PAR Rates ¹		Justified PARs			
		2016	2017	% Change in #	2016	2017	Numbers ² / Rates ³ 2016		Numbers ² / Rates ³ 2017	
CenturyLink	127,513	11	5	-55%	0.09	0.04	2	0.02	1	0.01
Frontier Commonwealth	95,148	6	8	33%	0.06	0.08	2	0.02	1	0.01
Verizon North	128,380	1	0	-100%	0.01	0.00	0	0.00	0	n/a ⁴
Verizon PA	626,927	56	38	-32%	0.07	0.06	14	0.02	1	0.00
Windstream	83,700	4	6	50%	0.04	0.07	1	0.01	2	0.02
Total	1,061,668	78	57	-27%			19		5	
Average of Rates					0.05	0.05		0.01		0.01⁴

¹ PAR rate = PARs per 1,000 residential customers.

² Estimated based on the number of cases in CSIS as of June 8, 2018.

³ Justified PAR rate = justified PARs per 1,000 residential customers.

⁴ No PARs were received for Verizon North in 2017, so its justified PAR rate could not be calculated; therefore, the calculation of the industry average excludes Verizon North.

Appendix H – Table 1

Chapter 56, Chapter 14 and Other Infraction Categories: 2017* Major Electric Distribution Companies

Description	Duquesne		Met-Ed		PECO+		Penelec		Penn Power		PPL		UGI-Electric		West Penn	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Billing and Payment (56.2-Def. of Billing Month, 56.2-Def. of Billing Period, 56.11, 56.12(7), 56.15, 56.21, 56.22, 56.24 and 56.25)	3	7%	2	4%	0	0%	3	5%	0	0%	8	12%	0	0%	0	0%
Meter Reading (56.12(1)-(6))	7	15%	4	7%	0	0%	2	3%	0	0%	10	14%	0	0%	6	11%
Make-Up Bills (56.14, 57.24, 59.22 and 65.9 (C))	6	13%	6	11%	0	0%	4	7%	1	6%	2	3%	0	0%	2	4%
Transfer of Accounts (56.16, 56.36(b)(3) and 56.72)	0	0%	4	7%	0	0%	4	7%	0	0%	0	0%	0	0%	7	13%
Credit Standards and Deposits (56.31-35, 56.36(b)(1)-(2), 56.37, 56.41, 56.42, 56.51, 56.53 and 1404)	5	11%	8	15%	2	11%	11	19%	9	53%	5	7%	2	50%	9	17%
Termination Grounds (56.2-Def. of Delinquent Acct., 56.81-83 and 56.100)	0	0%	5	9%	4	22%	4	7%	0	0%	3	4%	0	0%	1	2%
Termination Procedures (56.91-97, 56.112, 56.114 and 1406)	1	2%	1	2%	0	0%	0	0%	2	12%	4	6%	0	0%	0	0%
Reconnection of Service (56.115 and 56.191(a)-(c))	0	0%	6	11%	1	6%	1	2%	0	0%	0	0%	1	25%	0	0%
Liability - Responsibility for Bills (56.2-Def. of Applicant, 56.2-Def. of Customer and 56.191(d)-(e))	0	0%	0	0%	0	0%	1	2%	0	0%	0	0%	0	0%	0	0%
Landlord/Ratepayer (1521-1533)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Dispute Handling (56.2-Def. of Dispute, 56.2-Def. of Initial Inquiry, 56.141-152 and 56.181)	13	28%	14	26%	8	44%	26	45%	5	29%	22	32%	0	0%	22	41%
Other (54.73, 56.1, 56.202, 57.22, 1410.1, 1417 and 1501)	11	24%	4	7%	3	17%	2	3%	0	0%	15	22%	1	25%	7	13%
Total	46		54		18		58		17		69		4		54	

- * # equals the number of verified infractions identified by BCS as of Sept. 7, 2018.
 % equals the percent of the total number of infractions for a particular company.
 + PECO statistics include electric and gas.

Appendix H – Table 2

Chapter 56, Chapter 14 and Other Infraction Categories: 2017* Major Natural Gas Distribution Companies

Description	Columbia		NFG		Peoples		Peoples-Equitable		PGW		UGI – Gas		UGI Penn Natural	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Billing and Payment (56.2-Def. of Billing Month, 56.2-Def. of Billing Period, 56.11, 56.12(7), 56.15, 56.21, 56.22, 56.24 and 56.25)	0	0%	0	0%	0	0%	0	0%	3	5%	0	0%	0	0%
Meter Reading (56.12(1)-(6))	0	0%	1	20%	0	0%	0	0%	0	0%	0	0%	0	0%
Make-Up Bills (56.14, 57.24, 59.22 and 65.9 (C))	0	0%	0	0%	0	0%	0	0%	9	16%	0	0%	0	0%
Transfer of Accounts (56.16, 56.36(b)(3) and 56.72)	1	100%	1	20%	0	0%	0	0%	1	2%	0	0%	1	11%
Credit Standards and Deposits (56.31-35, 56.36(b)(1)-(2), 56.37, 56.41, 56.42, 56.51, 56.53 and 1404)	0	0%	0	0%	0	0%	0	0%	5	9%	2	33%	1	11%
Termination Grounds (56.2-Def. of Delinquent Acct., 56.81-83 and 56.100)	0	0%	0	0%	0	0%	0	0%	1	2%	2	33%	1	11%
Termination Procedures (56.91-97, 56.112, 56.114 and 1406)	0	0%	0	0%	0	0%	1	100%	2	4%	1	17%	2	22%
Reconnection of Service (56.115 and 56.191(a)-(c))	0	0%	0	0%	0	0%	0	0%	3	5%	0	0%	1	11%
Liability - Responsibility for Bills (56.2-Def. of Applicant, 56.2-Def. of Customer and 56.191(d)-(e))	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Landlord/Ratepayer (1521-1533)	0	0%	0	0%	0	0%	0	0%	2	4%	0	0%	0	0%
Dispute Handling (56.2-Def. of Dispute, 56.2-Def. of Initial Inquiry, 56.141-152 and 56.181)	0	0%	3	60%	0	0%	0	0%	25	44%	0	0%	1	11%
Other (56.1, 56.71, 56.202, 59.34, 59.36, 1410.1 and 1501)	0	0%	0	0%	1	100%	0	0%	6	11%	1	17%	2	22%
Total	1		5		1		1		57		6		9	

* # equals the number of verified infractions identified by BCS as of Sept. 7, 2018.
% equals the percent of the total number of infractions for a particular company.

Appendix H - Table 3

Chapter 56, Chapter 14 and Other Infraction Categories: 2017* Major Water Companies

Description	Aqua		PAWC		Audubon		Columbia		Newtown Artesian		SUEZ Bethel		SUEZ PA		York	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Billing and Payment (56.2-Def. of Billing Month, 56.2-Def. of Billing Period, 56.11, 56.12(7), 56.15, 56.21, 56.22, 56.24 and 56.25)	1	1%	3	3%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Meter Reading (56.12(1)-(6))	1	1%	3	3%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Make-Up Bills (56.14, 57.24, 59.22 and 65.9 (C))	14	10%	2	2%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Transfer of Accounts (56.16, 56.36(b)(3) and 56.72)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Credit Standards and Deposits (56.31-35, 56.36(b)(1)-(2), 56.37, 56.41, 56.42, 56.51, 56.53 and 1404)	4	3%	2	2%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Termination Grounds (56.2-Def. of Delinquent Acct., 56.81-83 and 56.100)	16	11%	14	14%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Termination Procedures (56.91-97, 56.112, 56.114 and 1406)	4	3%	7	7%	0	0%	0	0%	0	0%	0	0%	1	100%	0	0%
Reconnection of Service (56.115 and 56.191(a)-(c))	1	1%	2	2%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Liability - Responsibility for Bills (56.2-Def. of Applicant, 56.2-Def. of Customer and 56.191(d)-(e))	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Landlord/Ratepayer (1521-1533)	1	1%	1	1%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Dispute Handling (56.2-Def. of Dispute, 56.2-Def. of Initial Inquiry, 56.141-152 and 56.181)	97	68%	63	64%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Other (55.104, 56.1, 56.71 and 65.7)	3	2%	2	2%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	142		99		0		0		0		0		1		0	

* # equals the number of verified infractions identified by BCS as of Sept. 7, 2018.

% equals the percent of the total number of infractions for a particular company.

Appendix H – Table 4

Chapter 30, Chapter 63, Chapter 64 and Other Infraction Categories: 2017* Major Local Telephone Companies

Description	CenturyLink		Frontier Commonwealth		Verizon North		Verizon PA		Windstream	
	#	%	#	%	#	%	#	%	#	%
Broadband (3012-Def. of Broadband)	1	1%	5	2%	0	0%	5	1%	3	1%
Network Modernization Plans (3014)	0	0%	0	0%	1	2%	6	1%	4	1%
Complaint Procedures (63.15)	17	15%	39	14%	16	24%	195	21%	83	18%
Service Records (63.22)	2	2%	111	41%	6	9%	94	10%	136	30%
Customer Trouble Reports (63.57)	48	41%	52	19%	29	44%	372	39%	135	30%
Installation of Service (63.58)	1	1%	2	1%	0	0%	0	0%	6	1%
Migration (63.201-221)	0	0%	3	1%	0	0%	3	<1%	0	0%
Billing and Payment (53.85, 64.1, 64.12-14, 64.16, 64.18-19 and 64.24)	22	19%	2	1%	0	0%	19	2%	1	<1%
Slamming and Cramming (64.23)	0	0%	3	1%	0	0%	2	<1%	0	0%
Credit and Deposits (64.32-34 and 64.36)	0	0%	0	0%	0	0%	4	<1%	0	0%
Suspension and Termination (64.61, 64.63, 64.71-74, 64.81, 64.101, 64.102, 64.121-123, 64.133 and 64.181)	4	3%	0	0%	0	0%	3	<1%	0	0%
Dispute Procedures (64.141, 64.142 and 64.153)	12	10%	34	13%	0	0%	64	7%	21	5%
Other (63.23, 63.24, 63.53, 63.63, 64.2, 64.52-53, 64.192, 501(c) and 1501)	10	9%	19	7%	14	21%	183	19%	68	15%
Total	117		270		66		950		457	

* # equals the number of verified infractions identified by BCS as of May 14, 2018.

% equals the percent of the total number of infractions for a particular company.

Consumer Access to the Public Utility Commission

The Pennsylvania Public Utility Commission (PUC) provides access to consumers through the following telephone number:

PUC Hotline: 1-800-692-7380 (toll free)

Consumers can also reach the Commission
by mail at the following address:

Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Information about the PUC is available on the Internet:

www.puc.pa.gov



