



2019

Utility Consumer Activities Report and Evaluation

Pennsylvania Public Utility Commission



Utility Consumer Activities Report and Evaluation 2019

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1. Consumer Contacts to the Bureau of Consumer Services

The Pennsylvania Public Utility Commission's (PUC's) Bureau of Consumer Services (BCS) prepared the annual assessment of the major utilities in the 2019 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 telecommunications industries. As noted throughout the report, some of the data is based on a statistically valid sampling of informal complaints. 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 2019.

BCS began investigating and writing decisions on utility consumer complaints and service termination cases in April 1977. Since then, BCS has investigated over 2,237,141 cases, which include consumer complaints and payment arrangement requests (PARs) and it has received 1,724,328 opinions and requests for information (inquiries). In 2019, BCS received 152,361 contacts by consumers including 59,111 contacts that required investigation. It is important to note that BCS determined 87% of the 2019 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 statute and 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 presently 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 process. 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)?	2017	2018	2019
Excellent	56%	54%	49%
Good	20%	22%	23%
Fair	12%	13%	13%
Poor	12%	12%	15%

According to the survey results, 72% of consumers who contacted BCS in 2019 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 2017, 2018 and 2019.

BCS had a significant increase in the number of new investigators and trainees during the 2019 year. This extended the case closing timeframe which, in turn, potentially negatively impacted the satisfaction scores of the survey. Overall, implementation of the new BCS training program should benefit customer satisfaction.

Other concerns are the accuracy of the sampling and the significant decline in survey response rates. Findings of a recent internal review of this program have resulted in a change of direction. BCS is recalibrating its survey process to take advantage of new technology which will ensure that the survey represents a statistically valid sample size and accurately reflects the performance of all related staff.

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 telecommunications) provide valuable resources for measuring changes in utility 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 excluded from the analyses that appear later in this report because the cases did not fairly represent utility 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 utility prior to contacting the Commission.

Commercial customer contacts also were removed from the data used in the analysis. Although BCS's regulatory authority has largely been confined to residential accounts, the Bureau handled 1,007 cases from commercial customers in 2019. Of these cases, 297 were related to loss of utility service, while the remaining 710 were consumer complaints.

With respect to the 297 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 utility 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 2019 involved residential utility service. Appendix B presents a comparison of the number of residential and commercial consumer complaints and PARs for 2017, 2018 and 2019.

Total Volume of Consumer Complaints and Payment Arrangement Requests (PARs) to BCS in 2019*

Industry	Consumer Complaints		Payment Arrangement Requests	
	Residential	Commercial**	Residential	Commercial**
Electric	7,680	327	29,907	148
Gas	2,455	124	11,931	123
Water	1,106	88	3,604	24
Telecommunications	1,279	166	23	0
Other***	70	5	49	2
Total	12,590	710	45,514	297

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

** All cases 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/first call resolutions. 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, PARs and inquiries are collectively referred to as informal complaints. Inquiries/first call resolutions 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 telecommunications 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* 2017-19

Industry	2017	2018	2019	% Change 2017-19
Electric	8,462	9,558	8,007	-5%
Gas	2,253	2,835	2,579	15%
Water	922	1,429	1,194	30%
Telecommunications	1,577	1,944	1,445	-8%
Other	1	105	75	n/a**
Total	13,215	15,871	13,300	1%

* Table includes both residential and commercial consumer complaints.

** For the other industry, 60 of the 75 consumer complaints in 2019 were sewer-related complaints for Pittsburgh Water & Sewer Authority (PWSA), which came under PUC's regulatory authority Apr. 1, 2018, while the remaining 15 consumer complaints were for other utilities. Without PWSA, the 2017-19 percent change would be 1,400%; however, with the addition of PWSA, the 2017-19 percent change is 7,400%.

Electric and gas utilities accounted for 60% and 19%, respectively, of all consumer complaints investigated by BCS in 2019. Water utilities accounted for 9%, while telecommunications utilities were the subject of 11%.

Justified Consumer Complaints

BCS investigators issue decisions regarding consumer complaint cases. BCS policy analysts review a statistically valid 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 utility did not comply with Commission Orders, regulations, reports, Secretarial Letters, tariffs, etc.

Classification of Consumer Complaints

BCS has categorized the 2019 residential complaints into 14 categories for each of the electric, gas and water utilities and into 11 categories for each of the telecommunications utilities. The tables that show the percent of complaints in each category in 2019 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 2019.

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.

Act 201 of 2004^[1] changed the rules that apply to cash deposits, reconnection of service, termination of service, payment arrangements, and the filing of termination complaints by consumers for electric, gas, and water. The goal was to increase timely collections while ensuring that service is available to all customers based on equitable terms and conditions.^[2] The law is applicable to EDCs, water distribution utilities, and NGDCs with an annual operating income in excess of \$6 million.^[3] Steam and wastewater utilities are not covered by Chapter 14. On Oct. 22, 2014, Chapter 14 was revised and renewed for a period of 10 years. The Commission recently amended Chapter 56 to make the regulations consistent with the Chapter 14 updates.^[4] BCS is required to provide a report detailing the impact of Chapter 14 every five years. The first quinquennial report, *The Sixth Report to The General Assembly and The Governor Pursuant to Section 1415 – Implementation of Chapter 14*, was provided to the General Assembly and the Governor on Jan. 31, 2020.^[5] The next report is due in December 2024, the same year the current legislation sunsets.

All of the measures in this report 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 2019, BCS handled 45,811 PARs from customers of the utilities under the Commission's jurisdiction.

In 2019, the overall volume of PARs handled by the Commission decreased by 1% from 2017. PARs decreased since 2017 for electric by less than 1%, gas by 3% and telecommunications by 63%. PARs for water increased by 2% since 2017.

^[1] 66 Pa.C.S. §§1401-1418

^[2] 66 Pa. C.S. §1402

^[3] Small natural gas distribution utilities may voluntarily "opt in" to Chapter 14. 66 Pa. C.S. §1403.

^[4] Docket No. L-2015-2508421, published in Pennsylvania Bulletin June 1, 2019.

^[5] http://www.puc.pa.gov/general/publications_reports/pdf/Chapter14-Biennial013020.pdf

Payment Arrangement Requests (PARs) by Industry*

2017-19

Industry	2017	2018	2019	% Change 2017-19
Electric	30,070	31,448	30,055	-<1%
Gas	12,443	13,037	12,054	-3%
Water	3,557	4,185	3,628	2%
Telecommunications	63	36	23	-63%
Other	3	91	51	n/a**
Total	46,136	48,797	45,811	-1%

* 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.

** For the other industry, 50 of the 51 PARs in 2019 were sewer-related complaints for Pittsburgh Water & Sewer Authority (PWSA), which came under PUC's regulatory authority Apr. 1, 2018, while the remaining one PAR was for another utility. Without PWSA, the 2017-19 percent change would be a 67% decrease; however, with the addition of PWSA, the 2017-19 percent change is 1,600%.

As in past years, the majority of requests for payment arrangements in 2019 involved electric or gas utilities. Of the PARs, 66% (30,055 cases) were from electric customers, and 26% (12,054 cases) were from gas customers. Also, 8% of PARs (3,628 cases) came from customers of various water utilities. Less than 1% of PARs (23 cases) came from telecommunications customers.

First Call Resolution and Requests for Information (Inquiries)

During 2019, BCS received 21,831 customer contacts that did not require follow-up investigation beyond the initial contact. While many of these are actually informal complaints resolved on the first call, BCS currently classifies all of these contacts as "inquiries" for the purpose of storing them in its complaint information system. The inquiries for 2019 include contacts to the BCS Utility Customer Hotline, as well as contacts to BCS using mail, website and email communication.

In large part, the contacts in 2019 were from customers that did not qualify for a new payment arrangement to maintain their utility service. BCS 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 telecommunications 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 dismisses the case and 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 utility, informal complaints that BCS handled in spite of the fact that customers had not previously contacted

their utilities about their problems and cases that the investigators verbally dismissed. These 1,182 cases accounted for 5% of inquiries in 2019.

BCS is able to expand its list of 79 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; 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 2019 inquiries.

Categories of 2019 Inquiries

Reason for Contact	Number	Percent
Unable to open new PAR – service on	4,830	22%
Termination or suspension of service	3,998	18%
CAP inquiry/contact	3,946	18%
PUC has no jurisdiction	1,964	9%
Competition issues and requests for information	1,512	7%
Billing dispute	938	4%
Request for general information	682	3%
Applicant/deposit issue	449	2%
Service (utility facilities)	345	2%
People-delivered utility service	232	1%
Unable to open new PAR – service off	106	<1%
Rate protest	85	<1%
Weather outage	66	<1%
Rate complaint	8	<1%
Cramming*	1	<1%
Slamming*	0	0%
Other miscellaneous reasons	2,129	10%
Reason for contact is not available	540	2%
Total	21,831	98%

* Please refer to the Glossary of Terms, which immediately follows the Telecommunications 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 telecommunications 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 2019, BCS experienced an increase in the overall number of residential consumer complaints for the non-major utilities since 2017. Consumer complaints increased in the electric, gas and water industries, while the telecommunications industry experienced a decrease. This section

presents information about the residential consumer complaints that are not included in the industry chapters that follow.

**Residential Consumer Complaints by Industry
for Non-Major Utilities***
2017-19

Industry	2017	2018	2019	% Change 2017-19
Electric	1,594	1,768	1,690	6%
Gas	211	358	381	81%
Water	31	33	31	0%
Telecommunications	120	159	87	-28%
Total	1,956	2,318	2,189	12%

*See Appendix C

In 2019, BCS staff investigated consumer complaints about a variety of problems that consumers were having with the non-major utilities under the Commission's jurisdiction. The vast majority of complaints not included in the industry chapters involved electric and gas slamming.

The next-highest volume of complaints coming from residential customers of the non-major electric, gas, water and telecommunications utilities involved billing disputes. Those two types of complaints accounted for 81% of the residential consumer complaints about the non-major utilities in the electric industry; 64% of residential consumer complaints about the non-major gas utilities; 23% of the residential consumer complaints about the non-major water utilities; and 10% of the complaints about the non-major telecommunications utilities.

Appendix C presents a summary of the residential informal complaints (consumer complaints and PARs) that are not included in the electric, gas, water and telecommunications chapters that follow. The table lists the non-major utilities 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 2019.

Calls to the Commission about Electric and Gas Competition

In 2019, 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 88% of contacts about electric and gas competition are related to the electric industry, while 12% concern the gas industry. Call center employees recorded information from 3,944 consumer contacts about competition in the energy industries.

Consumer Contacts Regarding Competition by Industry 2017-19

Industry	2017	2018	2019	% Change 2017-19
Electric	3,607	3,980	3,490	-3%
Gas	257	387	454	77%
Total	3,864	4,367	3,944	2%

Many contacts came from consumers regarding various issues associated with customer choice in the electric and gas industries. Most frequently, consumers contacted BCS about slamming and competition bill disputes (32% and 27% of contacts, 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 possible 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 2019, 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 2019, BCS received 962 allegations of electric slamming and 103 allegations of slamming in the gas industry. There were two allegations of slamming in the telecommunications 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 1,067 slamming complaints received by BCS, 1,015 were filed by residential customers.

Allegations of Slamming by Industry 2017-19

Industry	2017		2018		2019	
	Residential	Commercial	Residential	Commercial	Residential	Commercial
Electric	705	37	895	35	912	50
Gas	41	1	80	3	102	1
Telecommunications	2	1	6	3	1	1
Total	748	39	981	41	1,015	52

Competition-related complaints have been excluded from the data set used to prepare the tables in the electric and gas industry chapters to more accurately reflect the distribution utility performance. BCS excluded 2,209 competition-related complaints from the electric industry chapter and 306 such complaints in

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

the gas industry chapter. Some customers experience a variety of problems as they choose electric and gas suppliers. BCS found that, after investigating these complaints, it is 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 utilities within the electric and gas industries. BCS continues this practice in 2019.

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 utility 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 utility 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 utility 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 utilities, 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.

2. Performance Measures

For the most part, BCS uses complaints it receives from customers of the major electric, gas, water and telecommunications utilities to assess utilities' complaint-handling performance. In nearly every case, the customer had already contacted the utility 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 utility. 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 utilities are drawn from reports required by Chapter 56 at §56.231(a)(14), while telecommunications 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 utility 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 utility did not handle a dispute properly or effectively, or, in handling the dispute, the utility 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 utility 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 utility 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 telecommunications 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 utility 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 utility 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 utility 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 utility. 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 utility 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 utilities 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 utility did not comply with Commission regulations, reports, Secretarial Letters, tariffs or guidelines.

Changes in utility 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 telecommunications industries. Because BCS receives a very large volume of requests for payment terms, it reviews a random sample of cases for the utilities with the largest number of PARs. For these utilities, 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 utilities using only their responses to PARs from customers whose service has been terminated, who have a dispute with the utility, or who have previously had a BCS payment arrangement for the amount that they owe.

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

Infraction Rate

During 2019, 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 2019 is calculated using BCS's Compliance Tracking System (CTS) data as of Sept. 10-11, 2020. The 2019 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 2019 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 2019 infraction rate in the report on 2020 complaint activity. Infraction rates for each major electric, gas, water and telecommunications utility are shown for 2017, 2018 and 2019 in upcoming chapters. Appendix H shows detailed information about the infractions BCS gleaned from its review of the 2019 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 utilities, and the infractions of Chapters 30, 63, 64 and other regulations for the major telecommunications utilities.

Termination Rate

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 termination activity between utilities. 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 telecommunications 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 utility 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 telecommunications industry chapter, data regarding Chapter 30 Broadband also is presented.

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" utilities as a whole. The telecommunications 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 2018 and 2019 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 / Other Low-Income Programs

The Commission has a long history of involvement in electric and gas universal service and energy conservation programs that help utility consumers obtain and keep service, and conserve energy. BCS monitors and evaluates universal service and energy conservation programs. 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; Hardship Fund Programs; and Customer Assistance and Referral Evaluation Services programs. An explanation of each of these programs is included in the Glossary of Terms.

In September 2020, the Commission released the 20th annual report on Universal Service Programs and Collections Performance. BCS prepared the report, which presents 2019 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_Rpt2019.pdf

Water and telecommunications utilities also offer programs to assist low-income customers. At the end of the water and telecommunications chapters that follow, readers will find highlights of the water and telecommunications programs that the Commission has supported and encouraged, not only in 2019, but in prior years as well.

3. Electric Industry

In 2019, 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 utilities.

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 utility 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 2019. 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 2019, 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 2017, 2018 and 2019 statistics on the performance of the seven largest EDCs, as well as UGI-Electric.

Consumer Complaints

During 2019, BCS handled 5,998 consumer complaints from residential customers of the various EDCs and 1,682 consumer complaints from residential customers of EGSs. Of these residential complaints, 77% (5,885) were from customers of the seven largest EDCs. For the analyses in this chapter, BCS excluded a total of 170 consumer complaints about the major EDCs that involved competition issues.

Consumer Complaint Categories

The following table shows the percentage of 2019 complaints from residential customers of the seven largest EDCs in each of the 14 categories used by BCS policy analysts. Appendix E, Tables 1 and 2, provides the actual number of cases that fell into each category in 2019.

Consumer Complaint Categories: 2019 Major Electric Distribution Companies

Categories	Duquesne	Met-Ed**	PECO+**	Penelec**	Penn Power	PPL**	West Penn**	Electric Average
Billing Disputes	17%	18%	20%	17%	11%	21%	14%	17%
Personnel Problems	17%	12%	15%	16%	13%	23%	15%	16%
Credit and Deposits	9%	18%	9%	23%	22%	2%	15%	13%
Discontinuance/ Transfer	9%	5%	16%	5%	11%	10%	5%	8%
Service Interruptions	15%	5%	6%	6%	9%	5%	14%	8%
Termination or PAR Procedures	9%	6%	12%	7%	10%	10%	5%	8%
Service Quality	6%	8%	3%	5%	4%	4%	10%	6%
Metering	2%	12%	2%	4%	5%	8%	5%	6%
Damages	3%	5%	3%	3%	7%	6%	9%	5%
Other Payment Issues	6%	4%	4%	4%	3%	6%	2%	4%
Service Extensions	1%	3%	2%	1%	1%	1%	2%	2%
Scheduling Delays	1%	1%	1%	<1%	1%	1%	2%	1%
Rates	2%	1%	1%	<1%	2%	1%	1%	1%
All Other Problems	4%	2%	6%	7%	3%	3%	4%	4%
Total-Number*	390	474	433	437	152	468	540	2,894

*Based on residential complaints opened in 2019 and evaluated by BCS as of July 10, 2020.

**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 2019, billing disputes accounted for 17%, personnel problems accounted for 16% and credit and deposits accounted for 13% of the consumer complaints for the major EDCs. These three categories accounted for 46% of consumer complaints about the major EDCs.

**2019 Residential Consumer Complaint Rates/
Justified Consumer Complaint Rates
Major Electric Distribution Companies**

Utility	Consumer Complaint Rate	Justified Consumer Complaint Rate
Duquesne	1.04	0.12
Met-Ed	1.58	0.11*
PECO+	1.16	0.05*
Penelec	1.43	0.09*
Penn Power	1.28	0.08
PPL	0.74	0.06*
West Penn	1.53	0.09*
Average	1.25	0.08

* 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 15 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 2017, 2018 and 2019.

**2017-19 Justified Residential
Consumer Complaint Rates
Major Electric Distribution Companies**

Utility	2017	2018	2019
Duquesne	0.08	0.14	0.12
Met-Ed*	0.26	0.20	0.11
PECO*+	0.05	0.16	0.05
Penelec*	0.26	0.10	0.09
Penn Power	0.18	0.15	0.08
PPL*	0.07	0.09	0.06
West Penn*	0.20	0.16	0.09
Average	0.16	0.14	0.08

* 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 decreased from 0.16 in 2017 to 0.08 in 2019. Of the seven major EDCs, four had justified consumer complaint rates that were higher than the industry average.
- From 2017 to 2019, the justified consumer complaint rate for Duquesne increased and the rates for Met-Ed, Penelec, Penn Power, PPL and West Penn decreased, while 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 2017, 2018 and 2019.

2017-19 Average Response Time to BCS Residential Consumer Complaints Major Electric Distribution Companies

Utility	Number of Days 2017	Number of Days 2018	Number of Days 2019	Change in Days 2017 to 2019
Duquesne	10.2	9.0	12.0	1.8
Met-Ed	15.9	13.6	15.8	-0.1
PECO+	16.1	17.4	18.6	2.5
Penelec	16.5	12.9	16.6	0.1
Penn Power	14.7	12.1	16.2	1.5
PPL	14.6	13.8	18.9	4.3
West Penn	16.2	12.8	15.6	-0.6
Average	14.9	13.1	16.2	1.3

+ PECO statistics include electric and gas.

- The calculation for average response time includes all residential consumer complaints for the major electric utilities.
- Overall, the average response time increased by 1.3 days, from 14.9 days in 2017 to 16.2 days in 2019.
- Duquesne had the shortest consumer complaint response time in 2019 at 12.0 days, while PPL had the longest at 18.9 days.

Payment Arrangement Requests

In 2019, BCS handled 29,692 PARs from residential customers of the EDCs. There were 215 PARs from residential customers of Pennsylvania's EGSs. Of the residential PARs, 97% (29,121) were from customers of the seven largest EDCs. In 2019, 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 utilities. Appendix G, Table 1, provides additional statistics regarding the PARs from residential customers of the major EDCs.

**2019 Residential Payment Arrangement Request (PAR) Rates/
Justified PAR Rates*
Major Electric Distribution Companies**

Utility	PAR Rate	Justified PAR Rate
Duquesne	3.26	0.39
Met-Ed	7.35	1.00
PECO+	4.45	0.76
Penelec	8.08	1.04
Penn Power	8.30	1.03
PPL	6.01	0.61
West Penn	6.83	0.83
Average	6.33	0.81

* All utilities 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 2019. 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 2017, 2018 and 2019.

**2017-19 Justified Residential
Payment Arrangement Request (PAR) Rates*
Major Electric Distribution Companies**

Utility	2017	2018	2019
Duquesne	0.23	0.37	0.39
Met-Ed	1.00	0.83	1.00
PECO+	0.41	0.63	0.76
Penelec	0.89	1.09	1.04
Penn Power	0.91	1.01	1.03
PPL	0.94	0.83	0.61
West Penn	0.37	0.57	0.83
Average	0.68	0.76	0.81

* All utilities 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 0.68 in 2017 to 0.81 in 2019.
- The justified PAR rates increased for five of the seven major EDCs from 2017 to 2019. Four of the major EDCs had justified PAR rates greater than the 2019 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 2017, 2018 and 2019.

**2017-19 Average Response Time to BCS
Residential Payment Arrangement Requests (PARs)
Major Electric Distribution Companies**

Utility	Number of Days 2017	Number of Days 2018	Number of Days 2019	Change in Days 2017 to 2019
Duquesne	5.7	3.8	5.1	-0.6
Met-Ed	11.6	8.2	11.7	0.1
PECO+	5.5	5.4	7.9	2.4
Penelec	12.0	8.6	11.6	-0.4
Penn Power	12.4	9.1	12.8	0.4
PPL	7.2	5.4	6.4	-0.8
West Penn	12.6	9.1	12.1	-0.5
Average	9.6	7.1	9.7	0.1

+ PECO statistics include electric and gas.

- The calculation for average response time includes PARs from customers of the major electric utilities whose service has been terminated, who have a dispute with the utility, or who have previously had a BCS payment arrangement for the amount that they owe.
- The average response time for the seven major EDCs increased by 0.1 days. The average response time went from 9.6 days in 2017 to 9.7 days in 2019.
- There was a wide range of PAR response times among the major EDCs in 2019, from a low of 5.1 days for Duquesne to a high of 12.8 days for Penn Power.

Termination and Reconnection of Service

Each month, the electric utilities 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 utility to utility, 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 utility. The following tables indicate the annual number of residential accounts each of the seven largest EDCs terminated and reconnected in 2017, 2018 and 2019. The first table also presents the termination rates for each of these utilities.

Residential Service Terminations/Termination Rates Major Electric Distribution Companies

Utility	Residential Service Terminations				Termination Rates		
	2017	2018	2019	% Change 2017-19	2017	2018	2019
Duquesne	21,777	26,119	27,688	27%	4.09	4.88	5.14
Met-Ed	23,870	24,099	26,076	9%	4.78	4.80	5.17
PECO+	90,145	85,583	92,977	3%	6.10	4.37	6.18
Penelec	21,096	19,949	21,065	<1%	4.21	3.98	4.21
Penn Power	4,360	4,089	4,293	-2%	3.02	2.81	2.94
PPL	42,216	44,971	53,340	26%	3.45	3.66	4.32
West Penn	14,234	13,577	19,743	39%	2.28	2.17	3.15
Total	217,698	218,387	245,182	13%			
Average of Rates					3.99	3.81	4.44

+ 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 13% more residential accounts in 2019 than in 2017.

Residential Service Reconnections Major Electric Distribution Companies

Utility	2017	2018	2019	% Change 2017-19
Duquesne	14,961	19,522	21,468	44%
Met-Ed	19,554	19,916	22,325	14%
PECO+	74,421	71,705	78,866	6%
Penelec	15,919	14,882	16,095	1%
Penn Power	3,415	3,186	3,449	1%
PPL	31,280	31,666	39,001	25%
West Penn	10,783	10,104	15,308	42%
Total	170,333	170,981	196,512	15%

+ PECO statistics include electric and gas.

- Overall, the seven major EDCs reconnected 15% more residential accounts in 2019 than in 2017.

Compliance

BCS provides utilities with written clarification or explanation 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 utilities 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 2017 through 2019. 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 2019 cases to the BCS.

Commission Infraction Rates Major Electric Distribution Companies

Utility	2017	2018	2019
Duquesne	0.09	0.21	0.16
Met-Ed	0.11	0.12	0.13
PECO+	0.01	0.03	0.03
Penelec	0.12	0.11	0.11
Penn Power	0.12	0.19	0.15
PPL	0.06	0.11	0.06
West Penn	0.09	0.13	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 2017 to 2019 for Duquesne, Met-Ed, PECO and Penn Power increased, the rate for Penelec decreased and the rates for PPL and West Penn remained stable.
- Appendix H, Table 1, presents the actual number of infractions for 2019 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 2019, the Commission had jurisdiction over 22 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 South f/k/a UGI Utilities Inc.-Gas (**UGI South**) and UGI North f/k/a UGI Penn Natural Gas (**UGI North**). 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 utility 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 2019. Appendices F and G provide statistics for these utilities from 2017, 2018 and 2019.

Consumer Complaints

During 2019, BCS handled 2,210 consumer complaints from residential customers of the various NGDCs and 245 consumer complaints from residential customers of natural gas suppliers (NGSs). Of these residential complaints, 84% (2,074) were from customers of the seven largest NGDCs. For the analyses of the seven major gas utilities that appear in this chapter, BCS excluded 25 consumer complaints that involved competition issues.

Consumer Complaint Categories

The following table shows the percentage of 2019 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 2019.

Consumer Complaint Categories: 2019 Major Natural Gas Distribution Companies

Categories	Columbia	NFG	Peoples	Peoples-Equitable	PGW**	UGI South	UGI North	Gas Average
Billing Disputes	17%	20%	17%	17%	24%	12%	15%	18%
Personnel Problems	25%	17%	24%	20%	14%	16%	15%	17%
Discontinuance/Transfer	10%	11%	3%	5%	21%	6%	10%	12%
Credit and Deposits	2%	1%	3%	3%	2%	31%	33%	12%
Termination or PAR Procedures	8%	11%	9%	13%	6%	9%	5%	7%
Service Quality	10%	6%	10%	11%	3%	2%	3%	5%
Other Payment Issues	2%	6%	3%	7%	5%	5%	5%	5%
Damages	8%	1%	7%	9%	3%	6%	3%	5%
Service Extensions	5%	6%	6%	6%	3%	3%	3%	4%
Metering	1%	8%	1%	2%	4%	2%	3%	3%
Scheduling Delays	2%	1%	6%	3%	2%	2%	2%	3%
Rates	5%	0%	2%	1%	1%	1%	2%	1%
Service Interruptions	1%	0%	1%	1%	1%	1%	1%	1%
All Other Problems	4%	11%	8%	4%	12%	4%	3%	7%
Total-Number*	100	83	177	112	468	244	195	1,379

*Based on residential complaints opened in 2019 and evaluated by BCS as of July 10, 2020.

**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 2019, billing disputes generated 18% of the complaints about the major gas utilities. Complaints about personnel problems accounted for 17% of residential consumer complaints about the major gas utilities.

**2019 Residential Consumer Complaint Rates/
Justified Consumer Complaint Rates
Major Natural Gas Distribution Companies**

Utility	Consumer Complaint Rate	Justified Consumer Complaint Rate
Columbia	0.34	0.01
NFG	0.49	0.05
Peoples	0.68	0.01
Peoples-Equitable	0.66	0.04
PGW	1.92	0.16*
UGI South	0.81	0.09
UGI North	1.50	0.16
Average	0.91	0.07

* 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 2019, the average of the consumer complaint rates was 13 times the average of the justified consumer complaint rates for the seven major gas utilities.
- 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 utility in 2017, 2018 and 2019.

**2017-19 Justified Residential
Consumer Complaint Rates
Major Natural Gas Distribution Companies**

Utility	2017	2018	2019
Columbia	0.01	0.01	0.01
NFG	0.04	0.05	0.05
Peoples	0.00	0.02	0.01
Peoples-Equitable	0.01	0.04	0.04
PGW*	0.14	0.15	0.16
UGI South	0.03	0.14	0.09
UGI North	0.04	0.29	0.16
Average	0.04	0.10	0.07

* 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 utilities increased from 0.04 in 2017 to 0.07 in 2019.
- The justified consumer complaint rates for NFG, Peoples, Peoples-Equitable, PGW, UGI South and UGI North increased, while the rate for Columbia remained stable from 2017 to 2019. The 2019 justified consumer complaint rates for PGW, UGI South and UGI North were greater than the 2019 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 utility in 2017, 2018 and 2019.

**2017-19 Average Response Time to BCS
Residential Consumer Complaints
Major Natural Gas Distribution Companies**

Utility	Number of Days 2017	Number of Days 2018	Number of Days 2019	Change in Days 2017 to 2019
Columbia	5.5	6.6	6.9	1.4
NFG	9.6	12.4	12.9	3.3
Peoples	3.0	3.5	3.6	0.6
Peoples-Equitable	3.0	3.4	3.8	0.8
PGW	19.9	17.6	14.8	-5.1
UGI South	5.8	16.3	11.3	5.5
UGI North	7.4	16.0	11.9	4.5
Average	7.8	10.8	9.3	1.5

- The calculation for average response time includes all residential consumer complaints for the major gas utilities.
- The average response time for the major gas utilities increased from 7.8 days in 2017 to 9.3 days in 2019.
- Consumer complaint response time performance varied among the major gas utilities in 2019, from a low of 3.6 days for Peoples to a high of 14.8 days for PGW.

Payment Arrangement Requests

In 2019, BCS handled 11,903 PARs from residential customers of the NGDCs. There were 28 PARs from residential customers of Pennsylvania's NGSS. Of the residential PARs, 94% (11,208) were from customers of the seven major NGDCs. In 2019, BCS reviewed a representative sample of the PARs for case outcome for Peoples, PGW, UGI South and UGI North. 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 utilities. Appendix G, Table 2, provides additional statistics regarding the PARs from residential customers of the major NGDCs.

**2019 Residential Payment Arrangement Request (PAR) Rates/
Justified PAR Rates
Major Natural Gas Distribution Companies**

Utility	PAR Rate	Justified PAR Rate
Columbia	1.17	0.03
NFG	3.10	0.24
Peoples	2.59	0.19*
Peoples-Equitable	2.76	0.20
PGW	9.87	1.06*
UGI South	6.35	0.75*
UGI North	9.58	1.03*
Average	5.06	0.50

* 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 five PARs to BCS for each 1,000 residential customers of the major NGDCs in 2019. 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 utility in 2017, 2018 and 2019.

**2017-19 Justified Residential
Payment Arrangement Request (PAR) Rates*
Major Natural Gas Distribution Companies**

Utility	2017	2018	2019
Columbia	0.02	0.02	0.03
NFG	0.11	0.23	0.24
Peoples*	0.07	0.15	0.19
Peoples-Equitable	0.09	0.15	0.20
PGW*	0.80	1.28	1.06
UGI South*	0.28	0.63	0.75
UGI North*	0.28	1.41	1.03
Average	0.23	0.55	0.50

* Based on a probability 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 increased from 0.23 in 2017 to 0.50 in 2019. All seven of the major gas utilities had increases in their justified PAR rates.
- The 2019 justified PAR rates among the major NGDCs ranged from a low of 0.03 for Columbia to a high of 1.06 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 utility in 2017, 2018 and 2019.

**2017-19 Average Response Time to BCS
Residential Payment Arrangement Requests (PARs)
Major Natural Gas Distribution Companies**

Utility	Number of Days 2017	Number of Days 2018	Number of Days 2019	Change in Days 2017 to 2019
Columbia	2.2	2.6	2.4	0.2
NFG	3.2	8.4	6.3	3.1
Peoples	0.9	2.2	2.3	1.4
Peoples-Equitable	1.7	2.2	2.1	0.4
PGW	12.0	11.6	7.6	-4.4
UGI South	1.7	9.5	6.2	4.5
UGI North	1.8	8.8	6.3	4.5
Average	3.4	6.5	4.7	1.3

- 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 utility, or who have previously had a BCS payment arrangement for the amount that they owe.
- From 2017 to 2019, the average response time for the major gas utilities increased by 1.3 days.
- The 2019 PAR response times for the major NGDCs varied from a low of 2.1 days for Peoples-Equitable to a high of 7.6 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 utility to utility, 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 utility. The tables that follow indicate the annual number of residential accounts each of the seven largest gas utilities terminated and reconnected in 2017, 2018 and 2019. The first table also presents the termination rates for each of these utilities.

Residential Service Terminations/Termination Rates Major Natural Gas Distribution Companies

Utility	Residential Service Terminations				Termination Rates		
	2017	2018	2019	% Change 2017-19	2017	2018	2019
Columbia	10,728	10,859	10,770	<1%	2.73	2.74	2.69
NFG	5,490	6,449	7,533	37%	2.79	3.27	3.83
Peoples	9,744	9,707	11,255	16%	2.92	2.90	3.35
Peoples-Equitable	7,757	8,622	9,444	22%	3.13	3.47	3.81
PGW	27,443	25,576	29,048	6%	5.78	5.36	6.05
UGI South	8,580	15,924	10,657	24%	2.43	4.40	2.90
UGI North	4,840	8,243	6,652	37%	3.14	5.27	4.24
Total	74,582	85,380	85,359	14%			
Average of Rates					3.27	3.92	3.84

- 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 utilities terminated 14% more residential accounts in 2019 than in 2017.

Residential Service Reconnections Major Natural Gas Distribution Companies

Utility	2017	2018	2019	% Change 2017-19
Columbia	5,881	6,054	6,153	5%
NFG	4,578	4,224	4,926	8%
Peoples	5,884	6,658	7,648	30%
Peoples-Equitable	5,171	6,055	6,598	28%
PGW	18,324	17,657	20,986	15%
UGI South	4,816	10,806	7,825	62%
UGI North	2,799	5,539	4,839	73%
Total	47,453	56,993	58,975	24%

- Overall, the seven major NGDCs reconnected 24% more residential accounts in 2019 than in 2017.

Compliance

BCS provides utilities with written clarification or explanation 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 utilities 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 2017 through 2019. Infractions identified on complaints involving competition issues are included in the infraction statistics. Appendix H, Table 2, presents detailed information about the infractions identified in 2019 cases to the BCS.

Commission Infraction Rates Major Natural Gas Distribution Companies

Utility	2017	2018	2019
Columbia	0.00	0.01	0.00
NFG	0.03	0.05	0.07
Peoples	0.00	0.03	0.01
Peoples-Equitable	0.00	0.02	0.03
PGW	0.12	0.17	0.19
UGI South	0.02	0.16	0.14
UGI North	0.06	0.34	0.24

- The infraction rate is the number of informally verified infractions per 1,000 residential customers.
- From 2017 to 2019, infraction rates increased for NFG, Peoples, Peoples-Equitable, PGW, UGI South and UGI North, while the infraction rate for Columbia remained stable.
- Appendix H, Table 2, presents the actual number of infractions for 2019 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 2019, the Commission had jurisdiction over 79 water utilities, including 21 municipal water utilities. The Commission categorizes the non-municipal water utilities into one of three classifications: A, B and C. Those three classifications are based on the amount of the utility's annual revenues.

The non-municipal water utilities with the largest annual revenues are classified as Class A water utilities. Class A water utilities must have annual revenues of \$1 million or more for three years in a row. In 2019, nine Class A water utilities served residential customers. The number of residential customers for these utilities ranged from 2,462 for SUEZ Water Bethel to 613,434 residential customers for Pennsylvania American Water Co. (**PAWC**).

In 2019, the Class A water utilities were Aqua Pennsylvania Inc. (**Aqua**), Audubon Water Co. (**Audubon**), Columbia Water Co. (**Columbia**), Community Utilities of PA (**Community Utilities**), 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 utilities, PAWC and Aqua, the individual statistics for the "Other Class A" utilities 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" utilities as a whole.

The other classes of water utilities have lower annual revenues and, typically, fewer residential customers. In 2019, six Class B utilities were operating. Class B water utilities have annual revenues between \$200,000 and \$999,999. In 2019, the number of residential customers for the Class B utilities ranged from 299 to 1,352. There were 42 Class C utilities in 2019. Class C water utilities have annual revenues of less than \$200,000. The number of residential customers for the Class C utilities ranged from one to 1,198 in 2019.

The municipal water and sewer utilities are owned by municipalities. The Commission's jurisdiction is limited to regulating the rates and service of customers served by the municipal water and sewer utilities that are outside the boundaries of the municipalities. However, Chapter 32, Water and Sewer Authorities in Cities of the Second Class, was added to Title 66 of the Public Utility Code on Dec. 21, 2017. The addition of Chapter 32 resulted in the Pittsburgh Water & Sewer Authority (PWSA) coming under PUC's jurisdiction, effective Apr. 1, 2018. Although PWSA is a municipal water and sewer authority, 66 Pa. C.S.A. § 3202 provides that Commission laws, regulations, orders, etc. shall apply to PWSA in the same manner as a public utility. A Municipal Water and Sewer section appears later in this chapter of the report in order to separate and distinguish municipal water and sewer data from the data of the major public water utilities.

The majority of residential consumer complaints and PARs to BCS came from customers of the Class A water utilities. Most of the complaints and PARs from water customers relate to 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 utility 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 utilities in 2019. Appendices F and G also present statistics about the performance of the Class A water utilities in 2017, 2018 and 2019.

Consumer Complaints

During 2019, BCS handled a total of 1,106 consumer complaints from residential customers of the various water utilities. Of those complaints, 97% (1,075) were from customers of the major water utilities, including 192 PWSA-Water complaints. The remaining 3% were from customers of smaller water utilities. While a majority of consumer complaints involved the Class A water utilities in 2019, the Commission devoted a significant amount of attention to the smaller water utilities. Sometimes the amount of time BCS spends on a few complaints from customers of a smaller utility exceeds the amount of time it spends addressing complaints filed against one of the larger utilities. This is because larger utilities typically have more resources to respond appropriately to complaints and PARs as compared to smaller water utilities with limited resources.

In 2019, customers of the small water utilities filed complaints with BCS for a variety of reasons. Of the 31 consumer complaints filed about the “Non-Class A” water utilities, 42% (13 cases) involved service complaints.

Consumer Complaint Categories

The following table shows the percentage of 2019 complaints from residential customers of the Class A water utilities 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 2019.

Consumer Complaint Categories: 2019 Major Water Utilities

Categories	Aqua	PAWC	Large Class A Avg	Audubon	Columbia	Community Utilities	Newtown Artesian	SUEZ Bethel	SUEZ PA	York	"Other Class A" Avg**	All Class A Water Average ***
Billing Disputes	28%	36%	33%	0%	0%	100%	0%	0%	28%	42%	34%	33%
Metering	21%	12%	15%	0%	100%	0%	0%	0%	28%	0%	18%	15%
Termination or PAR Procedures	14%	16%	15%	0%	0%	0%	0%	0%	6%	5%	5%	15%
Service Quality	6%	8%	7%	100%	0%	0%	0%	0%	16%	5%	14%	8%
Personnel Problems	4%	6%	5%	0%	0%	0%	0%	0%	3%	11%	5%	5%
Damages	3%	5%	4%	0%	0%	0%	0%	0%	16%	0%	9%	5%
Discontinuance / Transfer	4%	4%	4%	0%	0%	0%	0%	0%	0%	26%	9%	5%
Rates	13%	1%	5%	0%	0%	0%	0%	0%	0%	0%	0%	4%
Credit and Deposits	3%	5%	4%	0%	0%	0%	0%	0%	0%	0%	0%	4%
Service Interruptions	2%	3%	2%	0%	0%	0%	0%	0%	0%	0%	0%	2%
Service Extensions	1%	1%	1%	0%	0%	0%	0%	0%	0%	11%	4%	1%
Other Payment Issues	1%	1%	1%	0%	0%	0%	0%	0%	3%	0%	2%	1%
Scheduling Delays	0%	<1%	<1%	0%	0%	0%	0%	0%	0%	0%	0%	<1%
All Other Problems	2%	1%	1%	0%	0%	0%	0%	0%	0%	0%	0%	1%
Total-Number*	194	421	615	2	1	2	0	0	32	19	56	671

* Based on residential complaints opened in 2019 and evaluated by BCS as of July 10, 2020.

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

*** Calculated based on the rates of Aqua, PAWC and "Other Class A" utilities 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 utilities, 33% involved billing disputes.

**2019 Residential Consumer Complaint Rates/
Justified Consumer Complaint Rates
Major Water Utilities**

Utility	Consumer Complaint Rate	Justified Consumer Complaint Rate
Aqua	0.62	0.09
PAWC	0.94	0.15
Large Class A Average	0.78	0.12
Audubon	0.74	0.00
Columbia	0.10	0.00
Community Utilities	0.76	0.00
Newtown Artesian	0.00	0.00
SUEZ Bethel	0.00	0.00
SUEZ PA	0.60	0.05
York	0.32	0.02
“Other Class A” Average*	0.41	0.03
All Class A Average**	0.65	0.09

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

** Calculated based on the rates of Aqua, PAWC and “Other Class A” utilities 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 six 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 utility in 2017, 2018 and 2019.

**2017-19 Justified Residential
Consumer Complaint Rates
Major Water Utilities**

Utility	2017	2018	2019
Aqua	0.19	0.16	0.09
PAWC	0.14	0.21*	0.15
Large Class A Average	0.17	0.19	0.12
Audubon	0.00	0.00	0.00
Columbia	0.00	0.00	0.00
Community Utilities**	n/a	0.00	0.00
Newtown Artesian	0.00	0.11	0.00
SUEZ Bethel	0.00	0.00	0.00
SUEZ PA	0.02	0.15	0.05
York	0.00	0.02	0.02
“Other Class A” Average***	0.01	0.07	0.03
All Class A Average****	0.11	0.15	0.09

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

** Community Utilities was reclassified as a Class A water utility in 2018.

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

**** Calculated based on the rates of Aqua, PAWC and “Other Class A” utilities 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 decreased from 0.17 in 2017 to 0.12 in 2019.
- 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 utility in 2017, 2018 and 2019.

**2017-19 Average Response Time to BCS
Residential Consumer Complaints
Major Water Utilities**

Utility	Number of Days 2017	Number of Days 2018	Number of Days 2019	Change in Days 2017 to 2019
Aqua	18.6	17.5	22.5	3.9
PAWC	23.5	24.4	20.6	-2.9
Large Class A Average	21.1	20.9	21.6	0.5
Audubon	0.0	21.0	24.5	24.5
Columbia	4.0	3.0	1.0	-3.0
Community Utilities*	n/a	16.6	4.5	n/a
Newtown Artesian	0.0	1.0	0.0	0.0
SUEZ Bethel	0.0	0.0	0.0	0.0
SUEZ PA	25.5	25.2	30.5	5.0
York	5.1	3.9	4.4	-0.7
“Other Class A” Average**	17.3	16.6	20.1	2.8
All Class A Average***	19.8	19.5	21.1	1.3

* Community Utilities was reclassified as a Class A water utility in 2018.

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

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

- The calculation for average response time includes all residential consumer complaints for the Class A water utilities.
- The average response time for PAWC decreased by 2.9 days from 2017 to 2019. The average response time for Aqua increased 3.9 days, from 18.6 days in 2017 to 22.5 days in 2019.

Payment Arrangement Requests

In 2019, BCS handled 3,604 PARs from residential customers of the water industry. Of the residential PARs, 99% (3,583) were from customers of the major water utilities, including 127 PWSA-Water PARs. As in past years, for the utilities with the largest volume of requests, BCS policy analysts reviewed a representative sample of PARs for case outcome. In 2019, 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 utilities. 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 utilities.

**2019 Residential Payment Arrangement Request (PAR) Rates/
Justified PAR Rates
Major Water Utilities**

Utility	PAR Rate	Justified PAR Rate
Aqua	1.31	0.11
PAWC	4.51	1.09*
Large Class A Average	2.91	0.60
Audubon	0.00	0.00
Columbia	3.08	0.00
Community Utilities**	0.76	0.00
Newtown Artesian	0.10	0.00
SUEZ Bethel	0.00	0.00
SUEZ PA	0.85	0.00
York	1.29	0.03
“Other Class A” Average***	1.11	0.01
All Class A Average****	2.31	0.41

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

** Community Utilities was reclassified as a Class A water utility in 2018.

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

**** Calculated based on the rates of Aqua, PAWC and “Other Class A” utilities 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 utilities in 2019. 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 utility in 2017, 2018 and 2019.

**2017-19 Justified Residential
Payment Arrangement Request (PAR) Rates
Major Water Utilities**

Utility	2017	2018	2019
Aqua	0.13	0.14	0.11
PAWC*	0.76	1.05	1.09
Large Class A Average	0.45	0.60	0.60
Audubon	0.00	0.00	0.00
Columbia	0.00	0.00	0.00
Community Utilities**	n/a	0.00	0.00
Newtown Artesian	0.00	0.00	0.00
SUEZ Bethel	0.00	0.00	0.00
SUEZ PA	0.08	0.04	0.00
York	0.00	0.05	0.03
“Other Class A” Average***	0.03	0.03	0.01
All Class A Average****	0.31	0.41	0.41

* Based on a probability sample of cases.

** Community Utilities was reclassified as a Class A water utility in 2018.

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

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

- The justified PAR rate equals the number of justified PARs for each 1,000 residential customers.
- Between 2017 and 2019, the justified PAR rate for Aqua decreased from 0.13 to 0.11, while the justified PAR rate for PAWC increased from 0.76 to 1.09.
- 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 utility in 2017, 2018 and 2019.

**2017-19 Average Response Time to BCS
Residential Payment Arrangement Requests (PARs)
Major Water Utilities**

Utility	Number of Days 2017	Number of Days 2018	Number of Days 2019	Change in Days 2017 to 2019
Aqua	9.9	9.5	15.6	5.7
PAWC	15.6	16.7	12.3	-3.3
Large Class A Average	12.8	13.1	13.9	1.1
Audubon	46.0	8.0	0.0	-46.0
Columbia	4.0	6.1	10.3	6.3
Community Utilities*	n/a	11.5	5.0	n/a
Newtown Artesian	0.0	0.0	5.0	5.0
SUEZ Bethel	0.0	0.0	0.0	0.0
SUEZ PA	19.7	17.8	29.7	10.0
York	3.3	2.1	4.0	0.7
“Other Class A” Average**	9.1	17.2	14.3	5.2
All Class A Average***	11.6	11.1	14.1	2.5

* Community Utilities was reclassified as a Class A water utility in 2018.

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

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

- The calculation for average response time includes PARs from customers of the Class A water utilities whose service has been terminated, who have a dispute with the utility, or who have previously had a BCS payment arrangement for the amount that they owe.
- Aqua’s response time increased from 2017 by 5.7 days to 15.6 days in 2019. PAWC’s response time decreased 3.3 days, from 15.6 days in 2017 to 12.3 days in 2019.

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 utility to utility, depending on a variety of factors. The water utility 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 utility. The tables that follow indicate the annual number of residential accounts each of the water utilities terminated and reconnected in 2017, 2018 and 2019. The first table also presents the termination rates for each of these utilities.

Residential Service Terminations/Termination Rates Major Water Utilities

Utility	Residential Service Terminations				Termination Rates		
	2017	2018	2019	% Change 2017-19	2017	2018	2019
Aqua	5,912	7,415	7,125	21%	1.48	1.85	1.76
PAWC	21,475	24,695	22,749	6%	3.54	4.06	3.71
Large Class A Total	27,387	32,110	29,874	9%			
Large Class A Average of Rates					2.51	2.96	2.74
Audubon	0	0	13	n/a	0.00	0.00	0.48
Columbia	197	241	240	22%	2.05	2.49	2.47
Community Utilities*	n/a	157	158	n/a	n/a	5.98	6.00
Newtown Artesian	62	43	33	-47%	0.65	0.46	0.34
SUEZ Bethel	0	0	0	0%	0.00	0.00	0.00
SUEZ PA	501	372	534	7%	1.00	0.68	0.95
York	953	1,121	883	-7%	1.56	1.82	1.42
"Other Class A" Total	1,713	2,083	1,861	9%			
"Other Class A" Average of Rates**					1.27	2.45	1.28
All Class A Total	29,100	34,193	31,735	9%			
All Class A Average of Rates***					2.10	2.79	2.25

* Community Utilities was reclassified as a Class A water utility in 2018.

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

*** Calculated based on the rates of Aqua, PAWC and "Other Class A" utilities 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 utilities terminated 9% more residential accounts in 2019 than in 2017.

Residential Service Reconnections Major Water Utilities

Utility	2017	2018	2019	% Change 2017-19
Aqua	4,734	5,898	5,135	9%
PAWC	18,947	20,974	18,620	-2%
Large Class A Total	23,681	26,872	23,755	<1%
Audubon	0	0	10	n/a
Columbia	137	167	183	34%
Community Utilities*	n/a	59	102	n/a
Newtown Artesian	49	37	32	-35%
SUEZ Bethel	0	0	0	0%
SUEZ PA	364	177	198	-46%
York	585	763	509	-13%
“Other Class A” Total	1,135	1,247	1,034	-9%
All Class A Total	24,816	28,119	24,789	<1%

* Community Utilities was reclassified as a Class A water utility in 2018.

- Overall, the Class A water utilities reconnected less than 1% fewer residential accounts in 2019 than in 2017.

Compliance

BCS provides water utilities with written clarification or explanation 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 2017 through 2019. Appendix H, Table 3, presents detailed information about the infractions identified in 2019 cases to the BCS.

Commission Infraction Rates Major Water Utilities

Utility	2017	2018	2019
Aqua	0.36	0.31	0.14
PAWC	0.16	0.26	0.22
Audubon	0.00	0.00	0.00
Columbia	0.00	0.10	0.00
Community Utilities*	n/a	0.00	0.00
Newtown Artesian	0.00	0.11	0.00
SUEZ Bethel	0.00	0.00	0.00
SUEZ PA	0.02	0.18	0.12
York	0.00	0.03	0.02

* Community Utilities was reclassified as a Class A water utility in 2018.

- The infraction rate is the number of informally verified infractions per 1,000 residential customers.
- The infraction rate for Aqua decreased from 2017 to 2019, while the infraction rates for PAWC, SUEZ PA and York increased. The rates for Audubon, Columbia, Newtown Artesian and SUEZ Bethel remained stable.
- Appendix H, Table 3, presents the actual number of infractions for 2019 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.

Municipal Water and Sewer

As discussed earlier in this chapter, the Commission's jurisdiction over municipal water and sewer utilities is limited to regulating the rates and service of customers that are outside the boundaries of the municipalities. However, with the passage of Act 65 of 2017, Chapter 32 was added to Title 66 of the Public Utility Code. This resulted in the PUC gaining regulatory authority over the Pittsburgh Water and Sewer Authority (**PWSA**), effective Apr. 1, 2018. This Municipal Water and Sewer section was added to this report in order to separate and distinguish municipal water and sewer data from the data of the major water utilities. In this section, only PWSA data is included.

Act 65 established a process to transition PWSA to Commission regulation. For example, the law authorized PWSA to continue to provide service to its customers in accordance with their prior tariff until a new tariff was approved and effective. On Feb. 27, 2019, the Commission entered an Opinion and Order at Docket Nos. R-2018-3002645 (water) and Docket No. R-2018-3002647 (wastewater), which approved the new PWSA tariffs, effective Mar. 1, 2019.

Act 65 also required PWSA to file a Compliance Plan with the PUC detailing how the authority would bring its existing operating systems and procedures into compliance with applicable rules, regulations and orders of the Commission. The law mandates the PUC conduct an in-depth review of PWSA's Compliance Plan to ensure the Authority's compliance with the Public Utility Code and the Commission's regulations. The Commission's review of the PWSA Compliance Plan, which was filed by the Authority on Sept. 28, 2018, at Docket No. M-2018-2640802 (water) and Docket No. M-2018-2640803 (wastewater), was divided into a two-stage process. Stage 1 focuses on urgent infrastructure remediation and improvement and the revenue and financing requirements of maintaining service that supports public health and safety, followed by Stage 2, which focuses on PWSA billing and collection issues and the development of a proposed PWSA stormwater tariff. On Mar. 26, 2020, the Commission issued an order approving with modification a joint partial settlement on Stage 1 compliance issues. Following the adoption of the Commission's order, petitions for reconsideration, clarification and/or amendment of that order were filed. At the time of this report, resolution of those outstanding issues from the Stage 1 compliance plan proceeding are ongoing. Following the entry of an unappealable order on Stage 1, proceedings for the Stage 2 review of PWSA's Compliance Plan will commence.

In order to assist PWSA in the transition to PUC regulation, BCS provided extensive training to both PWSA and PUC staff. BCS conducted several on-site trainings in Pittsburgh to instruct PWSA staff on Commission regulations and policies. BCS staff also worked closely with PWSA management to review their practices and procedures to ensure they comply with applicable PUC laws and regulations. In addition to the training provided to PWSA, BCS provided training to its call center staff and investigators so they could best assist PWSA customers. Given the applicability of PWSA's prior tariff during its transition to PUC regulatory jurisdiction, BCS staff were trained on the prior tariff and instructed on the proper regulations to apply when investigating an informal PWSA complaint.

As a measure to provide consistent and uniform guidance to PWSA, BCS directed that all informal PWSA cases be reviewed by seasoned PUC managers. As cases were reviewed, BCS staff communicated directly with PWSA management to explain BCS decisions and to address compliance concerns. PWSA staff continue to cooperate with the PUC and are receptive to the Commission's feedback to ensure a smooth transition to PUC regulation.

PWSA is the largest combined water and sewer authority in Pennsylvania and currently serves over 97,800 residential customers throughout the City of Pittsburgh and surrounding communities. In addition to

PWSA Service Areas



In addition to the above clarification, it is important to note that data on PWSA infractions is not provided in this section as it is similarly provided for the major water utilities. PWSA's transition to PUC regulation is ongoing, as described above; therefore, it is premature for BCS to report this data. BCS will publish PWSA infraction data in future UCARE reports when all compliance transition activities are completed, including the PUC's review of the PWSA Compliance Plan.

Informal Complaint Activity: 2019 Municipal Water and Sewer Utilities

Utility	Inquiries			Residential Consumer Complaints			Residential PARs		
	2018*	2019	% Change 2018-19	2018*	2019	% Change 2018-19	2018*	2019	% Change 2018-19
PWSA-Water	160	72	-55%	179	192	7%	110	127	16%
PWSA-Sewer	52	26	-50%	87	55	-37%	80	48	-40%
Total	212	98	-54%	266	247	-7%	190	175	-8%

* PWSA came under the Commission's regulatory jurisdiction effective Apr. 1, 2018; therefore, the consumer complaint and PAR activity reflected in this table occurred on or after Apr. 1, 2018.

- The total activity for PWSA decreased from a total of 668 informal complaints in 2018 to 520 informal complaints in 2019.
- PUC regulatory jurisdiction over PWSA was not effective until Apr. 1, 2018; therefore, all customer contacts about PWSA prior to the effective date were tracked and categorized as inquiries. All customer contacts received on or after Apr. 1, 2018, were designated as inquiries/first call resolutions, consumer complaints or PARs, depending upon the nature of the customer's contact with BCS.

2018-19 Average Response Time to BCS Residential Consumer Complaints Municipal Water and Sewer Utilities

Utility	Number of Days 2018*	Number of Days 2019	Change in Days 2018 to 2019
PWSA-Water	7.1	8.4	1.3
PWSA-Sewer	8.1	10.2	2.1
Average	7.6	9.3	1.7

* PWSA came under the Commission's regulatory jurisdiction effective Apr. 1, 2018; therefore, the consumer complaint and PAR activity reflected in this table occurred on or after Apr. 1, 2018.

- The calculation for average response time includes all residential consumer complaints for PWSA.
- The average response time for PWSA increased from 7.6 days in 2018 to 9.3 days in 2019.

**2018-19 Average Response Time to BCS
Residential Payment Arrangement Requests (PARs)
Municipal Water and Sewer Utilities**

Utility	Number of Days 2018*	Number of Days 2019	Change in Days 2018 to 2019
PWSA-Water	8.2	5.7	-2.5
PWSA-Sewer	7.1	7.0	-0.1
Average	7.7	6.3	-1.4

* PWSA came under the Commission's regulatory jurisdiction effective Apr. 1, 2018; therefore, the consumer complaint and PAR activity reflected in this table occurred on or after Apr. 1, 2018.

- The calculation for average response time includes PARs from customers of PWSA whose service has been terminated, who have a dispute with the utility, or who have previously had a BCS payment arrangement for the amount that they owe.
- From 2018 to 2019, the average response time for PWSA decreased by 1.4 days, from 7.7 days to 6.3 days.

**Residential Service Terminations/Termination Rates
Municipal Water and Sewer Utilities**

Utility	Residential Service Terminations			Termination Rates	
	2018*	2019	% Change 2018-19	2018*	2019
PWSA	1,622	2,437	50%	1.70	2.49

* PWSA came under the Commission's regulatory jurisdiction effective Apr. 1, 2018; therefore, the termination and reconnection activity reflected in this table occurred on or after Apr. 1, 2018.

- The termination rate is the number of service terminations divided by the number of residential customers, expressed as a percent.
- The number of PWSA terminations represents the total number of residential customers who were terminated. This total includes customers who received combined water and sewer services, customers who only received sewer service and those customers who received water service only.
- Overall, PWSA terminated 50% more residential accounts in 2019 than in 2018.

Residential Service Reconnections Municipal Water and Sewer Utilities

Utility	2018*	2019	% Change 2018-19
PWSA	1,261	2,029	61%

* PWSA came under the Commission’s regulatory jurisdiction effective Apr. 1, 2018; therefore, the termination and reconnection activity reflected in this table occurred on or after Apr. 1, 2018.

- The number of PWSA reconnections represents the total number of residential customers who were reconnected. This total includes customers who received combined water and sewer services, customers who only received sewer service and those customers who received water service only.
- Overall, PWSA reconnected 61% more residential accounts in 2019 than in 2018.

Programs That Assist Low-Income Customers

Several water utilities 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% of the federal poverty level. The minimum requirements to enroll in the program include a past due bill amount of at least \$110, and the payment must be at least 21 days past due.

Each household enrolled in the Helping Hand program receives a plumbing inspection, including minor repairs to faulty plumbing and/or a conservation kit that contains 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 \$25 per month applied to their arrearage.

At the end of 2019, 183 active participants were enrolled in the Helping Hand program. During the year, Aqua spent \$22,336 to complete eligibility interviews and household audits. In addition, the company provided \$11,055 in arrearage forgiveness credits to 156 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% discount on their monthly service fees – a savings of about \$14 per month. The program provides water-saving devices and conservation education. As of March 2020, there were 22,810 customers who were billed at the discounted rate.

In addition to a discount for water, PAWC also offers a discount for wastewater customers at a 20% discount from the total wastewater billing for customers who qualify. As of March 2020, there were 2,287 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 qualifying water and wastewater customers. 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 2019 calendar year, PAWC's shareholders and customers provided \$460,290 in hardship fund benefits to 1,443 customers for an average benefit of \$319. In addition, PAWC's shareholders provided \$58,778 for the 2019 calendar year for wastewater customers. The funds provided benefits to 203 customers for an average benefit of \$290.

Pittsburgh Water and Sewer Authority (PWSA) – PWSA participates with the Dollar Energy Fund to provide several customer assistance programs. The Bill Discount Program provides a percentage-based reduction of fixed monthly water and wastewater conveyance charges for customers at or below 150% of the Federal Poverty Level. In 2019, bill discounts increased to 75% and 3,294 customers were enrolled in the Bill Discount Program at a savings of \$27 per month.

The Hardship Cash Assistance Program extends cash grants up to \$300 per year for customers who are at or below 150% of the Federal Poverty Level. During 2019, PWSA provided \$53,273 in cash grants to 192 water customers for an average benefit of \$277.

The Private Lead Line Replacement Community Environmental Project (CEP) offers private side lead line replacements for customers who are at or below 250% of the Federal Poverty Level. PWSA started CEP construction in late 2018. During 2019, PWSA performed work at 435 locations; 233 of which were verified to have had lead in some portion of the service line. Through March 2020, all 233 of those locations were replaced at a cost of \$2,415,717, and \$957,132 of this amount was related to the private side of the service lines where funds from the \$1.8 million allocated in the DEP settlement could be used.

PWSA customers who are billed for sewage treatment are also eligible for assistance through the Allegheny County Sanitary Authority's (ALCOSAN) Clean Water Assistance Fund. This program provided a \$32 credit in the first three quarters of 2019 and a \$34 credit in the fourth quarter of 2019, providing \$131,246 in grants to 4,030 PWSA customers in 2019.

Suez Water Pennsylvania (Suez Water PA) – Suez Water PA implemented the "Suez 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 2019 program year, the utility provided grants totaling \$6,171 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 2019, the utility expended \$434 for customer plumbing repairs and enrolled a total of three new customers in the York Water Cares program. As of program end 2019, four customers received arrearage forgiveness benefits totaling \$195 for an average benefit of approximately \$49 per customer. The utility anticipates an annual savings of \$240 in costs for termination proceedings that may be avoided as a result of customer participation in the York Water Cares program.

6. Telecommunications Industry

During 2019, BCS handled consumer complaints related to basic voice service, broadband, Lifeline, 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 2019, there were 552 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.

In 2019, based on §64.201 reporting, Pennsylvania local exchange carriers supplied service to an average of 1,041,709 residential telecommunications service access lines each month.

Because the five major ILECs provided voice telecommunications service to the vast majority of those telecommunications access service lines (an average of 926,362 residential service lines each month), this chapter will focus on the five major ILECs – CenturyLink (**CenturyLink**), Frontier Communications Commonwealth Telephone Co. (**Frontier Commonwealth**), Verizon North LLC (**Verizon North**), Verizon Pennsylvania LLC (**Verizon PA**) and Windstream Communications (**Windstream**).

Since 2017, BCS has included information related to broadband access service disputes within the telecommunications section of the annual UCARE. The Chapter 30 Broadband information currently provided in the report includes the information contained in the Pennsylvania Broadband Bill of Rights. Specifically, pursuant to Chapter 30 of the Code, Pennsylvania consumers have the right to obtain service from all Chapter 30 ILECs, which includes the five major ILECs, within ten (10) business days of the request for broadband access service and the service must meet the following broadband speed requirements: 1.544 megabits per second (Mbps) download and 0.128 Mbps upload.

The vast majority of broadband related informal complaints received by BCS also include a dispute regarding voice telecommunications service. For tracking and evaluative purposes, BCS assigns a telecommunications quality of service "reason for contact" code to these complaints. The complaints are tracked by placing a broadband speed, access, or availability dispute code on the case; however, no other indication of the specific Chapter 30 issue is tracked at this time.

UCARE also provides information about the number of informal telecommunications complaints that include a Chapter 30 related broadband dispute and the percentage of those complaints compared to the ILECs total number of informal complaints. When BCS identifies instances when the ILEC may have failed to meet their Chapter 30 obligations, the ILEC is notified of the infraction. These informal infractions are reported in the UCARE in Appendix H, table 4.

Unlike the electric, gas and water chapters, the analyses of the five utilities that appear in this chapter include complaints about competition-related issues such as slamming, competition-related service complaints and billing problems. This is the 17th year that competition-related complaints are included in the analyses of the telecommunications utilities.

Act 183 of 2004 replaced the original Chapter 30 that expired due to the sunset provisions included in the Act. Among other issues, it provided the opportunity for an incumbent local exchange carrier to petition the Commission for a determination of the competitive status of services it offered. On Mar. 4, 2015, the

Commission entered an Opinion and Order at Docket Nos. P-2014-2446303 and P-2014-2446304, which granted competitive reclassification for basic local exchange telecommunications services in 153 of the 504 Verizon PA and Verizon North wire centers throughout the state.² The reclassification temporarily waived certain sections of 52 Pa. Code, Chapters 63³ and 64⁴ for a maximum of five years or until the Commission promulgates a final rulemaking addressing competitive reclassification. On Feb. 27, 2020, the Commission issued an order extending the temporary waivers from Mar. 4, 2020 to Dec. 31, 2022 or until the issuance of final-form regulations in a pending rulemaking, whichever is earlier. On Sept. 21, 2020, the Commission issued a proposed Notice of Proposed Rulemaking (NOPR) addressing the temporary waiver. The NOPR proposes further modifications of the Commission’s telecommunications regulations in Chapters 53, 63 and 64.

Consumer Complaints

Although BCS handled consumer complaints about different types of telecommunications service providers in 2019, the complaints predominantly came from the residential customers of the five major ILECs. Overall, BCS handled 1,279 consumer complaints from residential customers of telecommunications service providers in 2019. Of those complaints, 1,192 were from residential customers of the five major ILECs, while 12 consumer complaints were received for the non-major ILECs. Meanwhile, 48 consumer complaints were from residential customers of the CLECs operating in Pennsylvania. Additionally, BCS handled 21 consumer complaints regarding wireless ETCs that provide Lifeline services in Pennsylvania, and the remaining six consumer complaints were from residential customers of other telecommunications providers such as long-distance carriers, resellers and Voice over Internet Protocol (VoIP) providers.

Consumer Complaint Categories

The following table shows the percentage of 2019 consumer complaints from residential customers of the major telecommunications utilities in each of the 11 categories used by BCS policy analysts to categorize consumer complaints about telecommunications utilities.

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: 2019 Major Local Telecommunications Utilities

Categories	Century-Link	Frontier Common-wealth	Verizon North	Verizon PA**	Wind-stream	Telecommunica-tions Average
Unsatisfactory Service	50%	68%	72%	79%	74%	74%
Billing Disputes	10%	8%	7%	6%	3%	6%
Service Delivery	10%	3%	6%	6%	3%	5%
Discontinuance/Transfer	5%	2%	3%	2%	0%	2%
Service Terminations	3%	1%	3%	1%	4%	2%
Credit and Deposits	3%	1%	0%	2%	1%	2%
Competition	0%	0%	0%	<1%	0%	<1%
Toll Services	3%	0%	0%	0%	0%	<1%
Annoyance Calls	0%	0%	0%	0%	0%	0%
Non-Recurring Charges	0%	0%	0%	0%	0%	0%
All Other Problems	18%	18%	10%	4%	15%	9%
Total-Number*	40	117	71	432	73	733

*Based on residential complaints opened in 2019 and evaluated by BCS as of July 10, 2020.

**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-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 telecommunications utilities, 85% fall into one of three complaint categories: unsatisfactory service, billing disputes or service delivery.
- Unsatisfactory service complaints account for 74% of the total number of consumer complaints for the five major telecommunications utilities in 2019. In 2018, unsatisfactory service accounted for 75% of all consumer complaints for the major telecommunications utilities.

The 2017, 2018 and 2019 consumer complaint figures for justified consumer complaint rates and response times for each of the major telecommunications utilities 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 telecommunications utilities.

2019 Residential Consumer Complaint Rates/ Justified Consumer Complaint Rates Major Local Telecommunications Utilities

Utility	Consumer Complaint Rate	Justified Consumer Complaint Rate
CenturyLink	0.45	0.18
Frontier Commonwealth	1.73	1.16
Verizon North	0.72	0.45
Verizon PA	1.53	1.00*
Windstream	1.12	0.63
Average	1.11	0.69

* 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 telecommunications utilities, the average consumer complaint rate is over one and a half times higher 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 telecommunications utility in 2017, 2018 and 2019.

**2017-19 Justified Residential
Consumer Complaint Rates
Major Local Telecommunications Utilities**

Utility	2017	2018	2019
CenturyLink	0.31	0.94	0.18
Frontier Commonwealth	0.78	1.11	1.16
Verizon North	0.16	0.36	0.45
Verizon PA*	0.60	1.17	1.00
Windstream	1.18	1.42	0.63
Average	0.61	1.00	0.69

* 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 Frontier Commonwealth, Verizon North and Verizon PA increased, while the rates decreased for CenturyLink and Windstream from 2017 to 2019.
- Frontier Commonwealth and Verizon PA had 2019 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 telecommunications utility in 2017, 2018 and 2019.

2017-19 Average Response Time to BCS Residential Consumer Complaints Major Local Telecommunications Utilities

Utility	Number of Days 2017	Number of Days 2018	Number of Days 2019	Change in Days 2017 to 2019
CenturyLink	10.0	13.5	17.1	7.1
Frontier Commonwealth	11.6	11.4	12.9	1.3
Verizon North	13.4	15.8	14.0	0.6
Verizon PA	13.9	15.1	13.3	-0.6
Windstream	23.0	17.0	16.1	-6.9
Average	14.4	14.6	14.7	0.3

- For the five major telecommunications utilities, the average response time to consumer complaints increased from 14.4 days in 2017 to 14.7 days in 2019.
- Since 2017, the average response times for Windstream decreased by over 6 days, while the average response time for CenturyLink increased by over 7 days.

Payment Agreement Requests

Telecommunications 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 telecommunications payment agreements, the PUC does not exert payment arrangement jurisdiction over competitive services. For the telecommunications industry, PARs are principally contacts to BCS or to utilities 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 service.⁵ Suspension of basic telecommunications 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 telecommunications cases involving telecommunications service suspension are concerned, failure to negotiate a payment agreement does not in itself mean that a dispute exists. Consequently, in this report, telecommunications cases that involve PARs have been separated from telecommunications PARs that also involve a dispute. For the telecommunications industry, PARs that involve a dispute are classified as consumer complaints. During 2019, BCS handled 23 PARs from residential customers of telecommunications service providers. Of these PARs, 19 were from residential customers of the five major

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.

telecommunications utilities. Appendix G, Table 4 shows the decline in the numbers of payment arrangement requests from 2017 to 2019.

The 2017, 2018 and 2019 justified PAR rates and response times for the major telecommunications utilities are presented in the tables that follow.

**2019 Residential Payment Agreement Request (PAR) Rates/
Justified PAR Rates
Major Local Telecommunications Utilities**

Utility	PAR Rate	Justified PAR Rate
CenturyLink	0.06	0.00
Frontier Commonwealth	0.03	0.01
Verizon North	0.01	0.00
Verizon PA	0.02	0.00
Windstream	0.00	0.00
Average	0.02	0.00

- 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 telecommunications utilities in 2019. Frontier Commonwealth was the only telecommunications utility with a statistically significant justified PAR rate.
- 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 telecommunications utility in 2017, 2018 and 2019.

**2017-19 Justified Residential
Payment Agreement Request (PAR) Rates
Major Local Telecommunications Utilities**

Utility	2017	2018	2019
CenturyLink	0.01	0.00	0.00
Frontier Commonwealth	0.01	0.02	0.01
Verizon North	0.00	0.00	0.00
Verizon PA	0.00	0.00	0.00
Windstream	0.02	0.00	0.00
Average	0.01	0.00	0.00

- 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 telecommunications utilities decreased from 0.01 in 2017 to 0.00 in 2019. Frontier Commonwealth had a justified PAR rate greater than the 2019 industry average.
- Two of the five major telecommunications utilities had justified PAR rates that decreased from 2017 to 2019, while three remained stable.
- 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 telecommunications utility in 2017, 2018 and 2019.

**2017-19 Average Response Time to BCS
Residential Payment Agreement Requests (PARs)
Major Local Telecommunications Utilities**

Utility	Number of Days 2017	Number of Days 2018	Number of Days 2019	Change in Days 2017 to 2019
CenturyLink	6.6	8.3	21.7	15.1
Frontier Commonwealth	3.1	7.7	19.0	15.9
Verizon North	0.0	7.5	1.0	1.0
Verizon PA	8.6	7.8	5.9	-2.7
Windstream	21.6	15.0	0.0	-21.6
Average	10.0	9.3	9.5	-0.5

- The average response time to PARs for the five major telecommunications utilities decreased from 10 days in 2017 to 9.5 days in 2019.
- From 2017 to 2019, the average response time to PARs for CenturyLink, Frontier Commonwealth and Verizon North increased, while the average response time decreased for Verizon PA and Windstream.

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 telecommunications 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 telecommunications service.

Residential Service Terminations/Termination Rates Major Local Telecommunications Utilities

Utility	Residential Service Terminations			Termination Rates		
	2017	2018	2019	2017	2018	2019
CenturyLink	8,232	7,188	5,736	64.56	62.72	53.36
Frontier Commonwealth	3,168	2,544	2,268	33.30	29.12	28.40
Verizon North	3,060	4,284	2,556	23.84	39.79	22.57
Verizon PA	18,132	15,852	14,232	28.92	31.07	25.87
Windstream	3,240	2,928	2,976	38.71	37.35	39.36
Total	35,832	32,796	27,768			
Average of Rates				37.86	40.01	33.91

- 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 telecommunications utilities decreased from 37.86 in 2017 to 33.91 in 2019.
- A percent change comparison of the number of residential terminations is not applicable to the telecommunications industry because it does not accurately reflect the reduction in the number of regulated service lines.

Compliance

The informal compliance notification process enables BCS to provide utilities with written clarification and explanation of Chapters 30, 63 and 64 provisions and other Commission regulations and policies. The informal compliance process is specifically designed to identify systemic errors. Utilities 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 utility 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 telecommunications utilities reviewed in this chapter. The infraction statistics are drawn from cases that residential consumers filed with BCS in 2017, 2018 and 2019. Appendix H, Table 4, presents detailed information about the infractions identified in 2019 cases to the BCS.

Commission Infraction Rates Major Local Telecommunications Utilities

Utility	2017	2018	2019
CenturyLink	0.92	2.48	0.32
Frontier Commonwealth	2.84	4.42	5.84
Verizon North	0.51	1.26	1.87
Verizon PA	1.52	2.29	2.93
Windstream	5.60	5.64	2.51

- The infraction rate is the number of informally verified infractions per 1,000 residential customers.
- Since 2017, the infraction rates for two of the major telecommunications utilities decreased, while the other three increased.
- Appendix H, Table 4, presents the actual number of infractions found on 2019 informal complaints for the major local telecommunications utilities by infraction category.

Universal Service Programs

As part of its ongoing responsibilities, BCS monitors the universal service programs of local telecommunications companies and wireless companies. For the telecommunications 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 telecommunications service by providing discounts or credits for telecommunications service. The Commission approved the implementation of Pennsylvania's first universal service program for local telecommunications companies in 1989.⁹ In December 1997, the Commission approved Lifeline service plans for 44 incumbent telecommunications utilities which led to the statewide implementation of telecommunications utilities' 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% of the federal poverty guidelines) as a new criterion for Pennsylvania's Lifeline program eligibility. Second, the Final Order

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.

directed all carriers designated by the Commission as 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% of Federal Poverty Guidelines) did not change. The Commission's order required ETCs designated by the Commission 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

¹¹ Jurisdictional ETCs include all ILECs and other providers of communications services that have obtained ETC designation from the state commission or the FCC. The Commission designates wireless providers as ETCs. ETCs may receive federal 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 U.S.C. §§ 214(e)(3-4) In a community where no telecommunications utility provides services supported by federal universal support mechanisms, the FCC (for interstate) and PUC (for intrastate) will determine which telecommunications utility is best able to provide such service. Any telecommunications utility 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 C.F.R. Part 54 – Universal Service

voice and mobile broadband access services;¹⁶ (4) the establishment of a National Verifier; and (5) port freeze rules.¹⁷

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, 2019, there were 304,821 low income Pennsylvania consumers enrolled in Lifeline. Wireless carriers provide Lifeline service to 292,313 of those consumers. The following table shows enrollment activity for the major telecommunications utilities' Lifeline programs in 2017, 2018 and 2019. Information regarding total Lifeline enrollment can be found in the Lifeline Tracking Report.

2017-19 Lifeline Service Activity

Utility	Total Number of Customers Who Received Lifeline Service			Total Number of Customers Enrolled as of December		
	2017	2018	2019	2017	2018	2019
CenturyLink	1,325	1,114	760	951	682	607
Frontier Commonwealth	1,159	1,002	848	917	762	733
Verizon North*	2,036	1,805	1,903	1,496	1,211	1,042
Verizon PA*	14,981	13,864	10,190	10,896	9,134	7,828
Windstream	1,939	1,571	1,220	1,389	1,018	906
Total	21,440	19,356	14,921	15,649	12,807	11,116

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

As of Dec. 1, 2019, the monthly Lifeline credit for stand-alone voice service is \$7.25, or \$9.25 for bundled service that meets the minimum standards for broadband. The monthly discount for the Verizon companies' Lifeline 100 is \$9.75.

As of Dec. 1, 2019, the minimum broadband standard for Lifeline subscribers who receive service through an ILEC is 20 Mbps download and 3 Mbps upload, with a minimum of 1,024 GB of usage each month. If the ILEC is unable to meet minimum speed standard, the ILEC must provide the highest performing broadband service available with at least 4 Mbps download and 1 Mbps upload. For Lifeline subscribers who receive service through wireless ETCs, the minimum standard is 3 GB per month of 3G or better mobile data.

¹⁶ As of Dec. 1, 2019, the minimum standard for wireless talk is 1,000 minutes, the minimum wireless broadband usage is 2 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 18 Mbps download and 2 Mbps upload, with minimum usage of 1,000 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.

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 utility that offers a financial assistance program that helps existing Lifeline 100 customers and qualified Lifeline 100 applicants (with a pre-existing basic service arrearage) to restore their basic telecommunications service. The Dollar Energy Fund manages UTAP and distributes funds to qualified customers and Lifeline applicants. The following table shows the number of customers enrolled in the Verizon PA Lifeline 100 program and the UTAP grants provided in 2017, 2018 and 2019.

2017-19 Verizon PA Lifeline 100 and UTAP Summary

	2017	2018	2019
Total Number of Customers Enrolled as of December	4,144	3,560	3,435
Number of Customers Given Assistance	42	8	13
Total Amount of Funds Distributed	\$2,418	\$451	\$994
Average Grant Amount	\$57.57	\$56.38	\$76.46

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 utility 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 utilities 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 utility 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.

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 Mar. 17, 2005).

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

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.

Non-Traditional ETC Designation

In 2018, the Federal Communications Commission conducted the Connect America Fund Phase II, Auction 903 to allocate support to provide broadband in certain eligible areas across the United States. Auction 903 ran from July 24, 2018 to Aug. 21, 2018. Pennsylvania had five winning bidders that will deploy broadband at 54,812 locations for a total of \$56,831,061 in support over 10 years. Among the auction winners were several non-traditional telecommunications providers including an electric cooperative and two satellite providers. To be eligible to receive support each of the winning bidders must be designated as an ETC in Pennsylvania. Tri-County Electric Cooperative d/b/a Tri-County Connections was the first of the non-traditional providers to receive ETC designation. The following table shows the wireless ETCs that operated in PA in 2019.

2019 PA Wireless and Non-Traditional ETCs

Utility	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
Boomerang Wireless d/b/a enTouch Wireless	P-2014-2421056	9/1/2016
Buffalo-Lake Erie d/b/a Blue Unlimited	P-2013-2382739	11/13/2014
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
Tri-County Electric Cooperative d/b/a Tri-County Connections	P-2018-3005127	4/27/2019

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

²⁰ See 66 Pa. C.S. § 3019(f).

National Lifeline Verifier

The National Verifier shifts the responsibility for determining Lifeline eligibility from ETCs to the program's administrator, the Universal Service Administrative Company (USAC). The National Verifier is a centralized system that confirms identity, and eligibility for Lifeline by accessing data in the National Lifeline Accountability Database (NLAD), federal and state databases. In Pennsylvania, USAC accesses the DHS Compass database to confirm consumer eligibility for Lifeline based on participation in SNAP, Medicaid or SSI.

On Dec. 4, 2018, the National Verifier launched in Pennsylvania. Initially, ETCs were not required to use the verifier; however, 23 Pennsylvania ETCs successfully used the verifier to obtain an eligibility decision during the first month. As of Mar. 5, 2019, applicants must receive an approved eligibility decision from the National Verifier to enroll in Lifeline. To receive an eligibility decision, applicants have the option of applying for Lifeline through the ETC of their choice, submitting the Universal Lifeline Application and Household Worksheet by mail or by applying through the consumer portal at checklifeline.org.

Chapter 30 Broadband

Act 183 of 2004 also addressed balancing the mandated deployment of broadband facilities without jeopardizing the provision of Universal Service. In both the original Chapter 30 enacted in 1993 and its replacement in 2004, all ILECs were required to provide 100% broadband availability to their retail access lines by Dec. 31, 2015. Act 183 granted ILECs reductions to their Commission-mandated productivity offsets in their already approved alternative ratemaking plans if they advanced their 100% broadband deployment target date to 2008 or 2013, except for Verizon Pennsylvania, LLC, which retained its 2015 target date but also received a reduction in its productivity offset.

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 business 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.

Many of the telecommunications complaints that BCS receives, also include issues with broadband speed and/or availability. In 2017, BCS began tracking complaints that contain a broadband component. The following table shows the total number of residential telecommunications informal complaints in 2017, 2018 and 2019 for each of the five major telecommunications utilities, compared to the number of complaints that included a dispute regarding broadband speed, access or availability.

2017-19 Chapter 30 Broadband Complaints
Residential Informal Complaints (Consumer Complaints and PARs)
Major Local Telecommunications Utilities

Utility	Total Number of Complaints			Total Number of Complaints with a Broadband Component			% of Complaints with a Broadband Component		
	2017	2018	2019	2017	2018	2019	2017	2018	2019
CenturyLink	97	171	54	11	60	23	11%	35%	43%
Frontier Commonwealth	121	148	140	25	88	80	21%	59%	57%
Verizon North	52	71	83	8	29	26	15%	41%	31%
Verizon PA	915	1,072	849	89	283	266	10%	26%	31%
Windstream	150	165	85	28	49	36	19%	30%	42%
Total	1,335	1,627	1,211	161	509	431	12%	31%	36%

- Overall, in 2019, 36% of the residential informal complaints for the major telecommunications utilities included a dispute regarding broadband speed, access, or availability, compared to 12% in 2017.

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 incumbent local exchange telecommunications providers to provide local telecommunications 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 telecommunications bill.

Customer Assistance Programs (CAPs) - Payment assistance and debt forgiveness programs for low-income households. CAPs are intended to provide affordable monthly bills based on a set energy burden standard. These lower rates are applied to ongoing usage as long as the household remains current and timely paying its monthly CAP payments. CAP charges may take the form of a discounted price on actual usage on either all or a portion of the usage, a percentage of the monthly bill, or a monthly amount that is calculated upon a percentage of the household income. Percentage of income plans are correlated directly to the household's income and the Commission-determined recommended energy burden percentage. CAP's debt forgiveness feature freezes a household's unpaid past debt upon entry into the program. As long as the household remains current and timely on their CAP payments, the past debt is not collected and is eventually forgiven in incremental amounts over time.

Customer Assistance and Referral Evaluation Services (CARES) - Social service and referral program for households encountering some form of extenuating circumstance or emergency that results in the household's inability to pay for utility service. Qualifying households may receive counseling and/or direct referrals to community resources that can aid the family in resolving the emergency.

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 - Programs that make cash grants available to qualifying households to assist in the payment of outstanding debt owed to the utility. They are generally funded through contributions made by the public that are matched by the utility and paid directly to the utility.

Incumbent Local Exchange Carrier (ILEC) - A telecommunications utility that was providing local telecommunications 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 telecommunications service. The term does not exclude the utility's provision of toll service in addition to basic service.

Low-Income Usage Reduction Program (LIURP) - Energy conservation and education program. Qualifying households receive an energy audit to assess household condition and energy usage; free installation of energy conservation and energy efficiency measures such as insulation, air sealing, and appliance installation if cost effective; and free education on energy conservation and usage reduction.

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 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 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 telecommunications 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?			
	2017	2018	2019
Very quickly	42%	43%	39%
Fairly quickly	35%	31%	25%
Not very quickly	11%	12%	16%
Not at all quickly	9%	10%	16%
Don't recall	2%	1%	2%
Have not heard from PUC	1%	3%	3%
How easy to understand was the information the PUC gave you about the outcome of the problem?			
	2017	2018	2019
Very easy	47%	46%	45%
Fairly easy	19%	20%	19%
Not very easy	4%	4%	4%
Not at all easy	2%	3%	2%
Don't recall	4%	4%	3%
Did not receive any information	24%	23%	27%
How polite was the first person you talked with at the PUC?			
	2017	2018	2019
Very polite	76%	74%	74%
Fairly polite	15%	16%	15%
Not very polite	2%	2%	2%
Not at all polite	1%	2%	2%
Don't recall	1%	1%	2%
Did not speak to anyone	5%	5%	4%
How interested in helping you was the first person you talked with at the PUC?			
	2017	2018	2019
Very interested	66%	64%	64%
Fairly interested	21%	21%	22%
Not very interested	6%	7%	5%
Not at all interested	3%	3%	4%
Don't recall	1%	1%	2%
Did not speak to anyone	3%	4%	4%
If you had another problem with a utility, would you contact the PUC again?			
	2017	2018	2019
Yes	81%	79%	81%
No	9%	8%	7%
Not sure	10%	13%	12%

Appendix B

Total Volume of Consumer Complaints and Payment Arrangement Requests to BCS in 2017-19

Industry	Consumer Complaints								Payment Arrangement Requests (PARs)							
	Residential				Commercial				Residential				Commercial			
	2017	2018	2019	% Change 2017-19	2017	2018	2019	% Change 2017-19	2017	2018	2019	% Change 2017-19	2017	2018	2019	% Change 2017-19
Electric	8,038	9,116	7,680	-5%	424	442	327	-23%	29,942	31,299	29,907	<-1%	128	149	148	16%
Gas	2,126	2,706	2,455	16%	127	129	124	-2%	12,399	12,912	11,931	-4%	44	125	123	180%
Water	873	1,334	1,106	27%	49	95	88	80%	3,543	4,145	3,604	2%	14	40	24	71%
Telecomm unications	1,398	1,754	1,279	-9%	179	190	166	-7%	60	36	23	-62%	3	0	0	-100%
Other*	1	96	70	n/a**	0	9	5	n/a	3	91	49	n/a***	0	0	2	n/a
Total	12,436	15,006	12,590	1%	779	865	710	-9%	45,947	48,483	45,514	-1%	189	314	297	57%

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

** For the other industry, 60 of the 75 consumer complaints in 2019 were sewer-related complaints for Pittsburgh Water & Sewer Authority (PWSA), which came under PUC’s regulatory authority Apr. 1, 2018, while the remaining 15 consumer complaints were for other utilities. Without PWSA, the 2017-19 percent change would be 1,400%; however, with the addition of PWSA, the 2017-19 percent change is 7,400%.

*** For the other industry, 50 of the 51 PARs in 2019 were sewer-related complaints for Pittsburgh Water & Sewer Authority (PWSA), which came under PUC’s regulatory authority Apr. 1, 2018, while the remaining one PAR was for another utility. Without PWSA, the 2017-19 percent change would be a 67% decrease; however, with the addition of PWSA, the 2017-19 percent change is 1,600%.

Appendix C

2019 Residential Informal Complaints (Consumer Complaints and PARs) for Utilities Not Included in Industry Chapters

Utility*	Number of Complaints	Total Number of Complaints Includes Secondary Utility Complaints **
ELECTRIC		
Citizens Electric Company of Lewisburg (EDC)	6	6
Pike County Light and Power (EDC)	19	20
Other Electric distribution companies (EDCs)***	5	5
4 Choice Energy (EGS)	32	38
AEP Energy (EGS)	11	15
Ambit Energy (EGS)	13	17
American Power & Gas of PA (EGS)	19	19
AP Gas and Electric (EGS)	14	25
Arcadia Power (EGS)	5	5
Astral Energy (EGS)	5	5
Atlantic Energy (EGS)	13	14
Cirro Energy (EGS)	13	17
Clean Choice Energy (EGS)	20	25
Clearview Electric (EGS)	11	13
Constellation Energy Power Choice (EGS)	5	8
Discount Power (EGS)	10	12
Elec-Direct Energy Services (EGS)	44	70
Eligo Energy PA (EGS)	63	75
Energy Harbor f/k/a First Energy Solutions (EGS)	16	34
Energy Plus Holdings (EGS)	10	11
Energy Rewards / Comcast / Everyday Energy (EGS)	8	8
Frontier Utilities Northeast (EGS)	15	22
Great American Power (EGS)	36	43

*Only those non-major utilities having five or more complaints in 2019 are listed individually. Non-major utilities having less than five residential complaints in 2019 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 utility is listed as the secondary utility.

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

Appendix C (Continued)

2019 Residential Informal Complaints Consumer Complaints and PARs for Utilities Not Included in Industry Chapters

Utility*	Number of Complaints	Total Number of Complaints Includes Secondary Utility Complaints **
ELECTRIC (continued)		
Green Mountain Energy (EGS)	63	79
Hudson Energy Services (EGS)	0	6
IDT Energy (EGS)	10	10
Indra Energy (EGS)	125	154
Inspire Energy Holdings (EGS)	91	106
Interstate Gas Supply (EGS)	31	40
Josco Energy USA (EGS)	19	25
Just Energy PA (EGS)	14	16
Liberty Power (EGS)	14	24
Life Energy (EGS)	29	35
Median Energy PA	15	19
National Gas and Electric (EGS)	13	17
New Energy Ventured - Mid Atlantic (EGS)	8	16
Nextera Energy Service PA (EGS)	15	20
North American Power and Gas (EGS)	18	26
NRG Home (EGS)	164	190
Oasis Energy (EGS)	0	7
Park Power (EGS)	41	45
Pennsylvania Gas and Electric (EGS)	125	145
Planet Energy PA (EGS)	8	8
Public Power (EGS)	0	5
Residents Energy (EGS)	11	14
Respond Power (EGS)	23	26

*Only those non-major utilities having five or more complaints in 2019 are listed individually. Non-major utilities having less than five residential complaints in 2019 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 utility is listed as the secondary utility.

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

Appendix C (Continued)

2019 Residential Informal Complaints (Consumer Complaints and PARs) for Utilities Not Included in Industry Chapters

Utility*	Number of Complaints	Total Number of Complaints Includes Secondary Utility Complaints **
ELECTRIC (continued)		
RPA Energy (EGS)	16	18
Rushmore Energy (EGS)	29	35
SFE Energy (EGS)	67	84
Shipleigh Oil (EGS)	11	17
Smartenergy.com (EGS)	33	43
Spark Energy (EGS)	0	7
Spring Power & Gas (EGS)	12	13
Star Energy Partners (EGS)	6	8
Starion Energy of PA (EGS)	0	7
Stream Energy (EGS)	25	34
Think Energy / Engie Retail (EGS)	14	18
Titan Gas and Power (EGS)	45	60
Tomorrow Energy (EGS)	74	99
Town Square Energy East (EGS)	6	7
TriEagle Energy (EGS)	26	32
Verde Energy USA (EGS)	243	273
Vista Energy Marketing (EGS)	23	33
WGL Energy Services f/k/a WGES (EGS)	0	7
Xoom Energy PA (EGS)	14	15
Other Electric Generation Suppliers (EGSs)***	53	53
Total Non-Major Electric	1,927	2,403

*Only those non-major utilities having five or more complaints in 2019 are listed individually. Non-major utilities having less than five residential complaints in 2019 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 utility is listed as the secondary utility.

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

Appendix C (Continued)

2019 Residential Informal Complaints (Consumer Complaints and PARs) for Utilities Not Included in Industry Chapters

Utility*	Number of Complaints	Total Number of Complaints Includes Secondary Utility Complaints **
GAS		
Peoples Gas Co. f/k/a Peoples TWP (NGDC)	186	191
UGI Central Penn Gas (NGDC)	636	639
Other Natural Gas Distribution Companies (NGDCs)***	9	9
Atlantic Energy (NGS)	7	9
Direct Energy Services (NGS)	6	8
Dominion Energy Solutions (NGS)	22	28
IGS Energy (Interstate Gas Supply) (NGS)	11	12
Indra Energy (NGS)	66	76
Josco Energy USA (NGS)	6	8
Major Energy (NGS)	0	5
NRG Home (NGS)	11	13
Pennsylvania Gas and Electric (NGS)	34	37
SFE Energy (NGS)	15	20
Shipley Energy (Shipley Oil Service) (NGS)	0	5
Tomorrow Energy (NGS)	27	31
Verde Energy USA Pennsylvania (NGS)	15	16
Vista Energy Marketing (NGS)	11	11
Xoom Energy Pennsylvania (NGS)	5	6
Other Natural Gas Suppliers (NGSs)***	37	40
Total Non-Major Gas	1,104	1,164

*Only those non-major utilities having five or more complaints in 2019 are listed individually. Non-major utilities having less than five residential complaints in 2019 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 utility is listed as the secondary utility.

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

Appendix C (Continued)

2019 Residential Informal Complaints (Consumer Complaints and PARs) for Utilities Not Included in Industry Chapters

Utility*	Number of Complaints
WATER	
Reynolds Water (WP)	5
Other Private Water***	27
City of Lancaster (WM)	12
Other Municipal Water***	8
Total Non-Major Water	52
TELECOMMUNICATIONS	
Consolidated Communications f/k/a North Pgh (ILEC)	6
Other Incumbent Local Exchange Carriers (ILECs)***	8
AT&T Local (CLEC)	7
Atlantic Broadband (CLEC)	6
Frontier Communications CTSI (CLEC)	20
Other Competitive Local Exchange Carriers (CLECs)***	17
Comcast Digital Phone (VOIP)	6
Safelink Wireless (Tracfone) (ETC)	8
T-mobile (Inreach) (ETC)	5
Other Providers of Telecommunications Services***	8
Total Non-Major Telecommunications	91

*Only those non-major utilities having five or more complaints in 2019 are listed individually. Non-major utilities having less than five residential complaints in 2019 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 utility is listed as the secondary utility.

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

Appendix C (Continued)

2019 Residential Informal Complaints (Consumer Complaints and PARs) for Utilities Not Included in Industry Chapters

Utilities with Less Than Five Residential Complaints	
ELECTRIC	
<u>Other EDCs:</u> Borough of Schuylkill Haven, Borough of St. Clair and Wellsboro Electric	
<u>Other EGSs:</u> Agera Energy, Agway Energy Services, Alpha Gas and Electric, Better Buy Energy, Champion Energy Services, Choose Energy, Dynegy Energy Services, Engie Resources, Entrust Energy, Greenlight Energy, Integrity Energy, Just Energy Solutions f/k/a Commerce, Marathon Power, Mpower Energy NJ, New Wave Energy, Nordic Energy Services, Ntherm, Plymouth Rock Energy, Powervine Energy, PSEG Energy Solutions, Smartestenergy, South Bay Energy, Statewise Energy, Viridian Energy PA and Yep Energy	
GAS	
<u>Other NGDCs:</u> Herman Oil and Gas, Northeast Heat and Light, Pike County Light and Power, Riemer Natural Gas and Valley Energy	
<u>Other NGSS:</u> Agway Energy Services, Alpha Gas and Electric, American Power and Gas of PA, Bluerock Energy, Constellation Energy Gas Choice f/k/a MxEnergy, Energy Rewards / Everyday Energy, Equitable Energy, Frontier Utilities Northeast, IDT Energy, Mpower Energy NJ, National Gas and Electric, North American Power and Gas, Ntherm, Park Power, Planet Energy, Residents Energy, RPA Energy, Spring Power and Gas, Stream Energy, Titan Gas and Power, UGI Energy Services - Energylink and WGL Energy Services f/k/a WGES	
WATER	
<u>Other Private Water:</u> Appalachian Utilities, Corner Water Supply and Service, Evitts Creek Water, Hidden Valley Utility Services, Imperial Point Water Services, Ken-Man Water, Manwalamink Water, Overbrook Water, Pennsylvania Utility Co. - Water, Plumer Water, Pocono Water, Rock Springs Water, Twin Lakes Water and Venango Water	
<u>Other Municipal Water:</u> City of Bethlehem, City of Lock Haven Water Department, City of Philadelphia and Hanover Water Works	
TELECOMMUNICATIONS	
<u>Other ILECs:</u> Armstrong Telephone, North Penn Telephone, North-Eastern PA Telephone, Pennsylvania Telephone, South Canaan Telephone and TDS Telecom	
<u>Other CLECs:</u> Full Service Network, RCN Telecom of PA, Sprint Communication, Talk America Services, Windstream Communications and Zito Media Voice	
<u>Other Providers of Telecommunications Services:</u> American Assistance Wireless, Assurance Wireless (Virgin Mobile), Qlink Wireless and Standup Wireless (Global Connections)	

Appendix D-1

Classification of Consumer Complaints

Electric, Gas and 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 and Deposits - Complaints about a utility'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 utility to return a deposit to the customer.

Damages - Complaints about a utility's lack of payment or lack of restored property related to damages to equipment, appliances or property due to service outages, utility 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 utility 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 (utility 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 utility personnel: a utility representative did not finish the job correctly; a meter reader entered a customer's home to read the meter without knocking; utility 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 utility's CAP program or procedures.

Rates - General or specific complaints about a utility's rates: general or specific rates are too high; the utility'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 utility'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 utility's equipment is unsatisfactory or unsafe; the utility fails to act on a complaint about safety; the utility plans to abandon service; the utility does not offer needed service; the utility wants to change location of equipment; or the utility 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 utility 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

Telecommunications

Annoyance Calls - Complaints about the utility's failure to resolve problems related to receiving unsolicited sales calls or harassing calls. This includes the utility'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 and Deposits - Complaints about a utility'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 utility 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; utility failure to finalize the account as requested; or the utility'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 and/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 and/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 utility 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: 2019*

Major Electric Distribution Companies

Categories**	Duquesne	Met-Ed ***	PECO ***+	Penelec ***	Penn Power	PPL ***	UGI- Electric	West Penn***	Electric Total
Billing Disputes	65	83	87	76	17	96	19	73	516
Personnel Problems	67	59	65	70	19	106	9	79	474
Credit and Deposits	36	84	38	99	33	9	37	82	418
Discontinuance/Transfer	36	22	69	23	16	49	6	27	248
Service Interruptions	57	23	28	28	13	23	1	73	246
Termination or PAR Procedures	37	28	51	32	15	45	4	25	237
Service Quality	22	37	13	20	6	21	0	53	172
Metering	8	57	10	19	7	38	4	28	171
Damages	13	25	11	14	11	26	2	46	148
Other Payment Issues	22	21	19	17	5	27	2	9	122
Service Extensions	2	15	8	6	1	5	0	12	49
Scheduling Delays	3	6	5	2	1	4	0	10	31
Rates	6	3	4	2	3	4	0	3	25
All Other Problems	16	11	25	29	5	15	5	20	126
Total	390	474	433	437	152	468	89	540	2,983

* Categories are for residential complaints opened in 2019 and evaluated by BCS as of July 10, 2020.

** 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: 2019*

Major Natural Gas Distribution Companies

Categories**	Columbia	NFG	Peoples	Peoples-Equitable	PGW***	UGI South	UGI North	Gas Total
Billing Disputes	17	17	30	19	111	29	30	253
Personnel Problems	25	14	43	22	67	38	30	239
Discontinuance/Transfer	10	9	5	6	96	15	19	160
Credit and Deposits	2	1	5	3	8	76	64	159
Termination or PAR Procedures	8	9	16	14	26	21	9	103
Service Quality	10	5	18	12	14	6	5	70
Other Payment Issues	2	5	6	8	24	13	10	68
Damages	8	1	13	10	15	14	5	66
Service Extensions	5	5	10	7	15	7	5	54
Metering	1	7	2	2	18	6	6	42
Scheduling Delays	2	1	11	3	10	5	3	35
Rates	5	0	3	1	4	3	3	19
Service Interruptions	1	0	1	1	3	2	1	9
All Other Problems	4	9	14	4	57	9	5	102
Total	100	83	177	112	468	244	195	1,379

* Categories are for residential complaints opened in 2019 and evaluated by BCS as of July 10, 2019.

** 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: 2019*

Major Water Utilities

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Categories**	Aqua	PAWC	Large Class A Total	Audubon	Columbia	Community Utilities	Newtown Artesian	SUEZ Bethel	SUEZ PA	York	"Other Class A" Total	All Class A Water Total
Billing Disputes	55	150	205	0	0	2	0	0	9	8	19	224
Metering	40	51	91	0	1	0	0	0	9	0	10	101
Termination or PAR Procedures	28	67	95	0	0	0	0	0	2	1	3	98
Service Quality	11	35	46	2	0	0	0	0	5	1	8	54
Personnel Problems	7	24	31	0	0	0	0	0	1	2	3	34
Damages	5	22	27	0	0	0	0	0	5	0	5	32
Discontinuance/Transfer	8	18	26	0	0	0	0	0	0	5	5	31
Rates	25	4	29	0	0	0	0	0	0	0	0	29
Credit and Deposits	5	21	26	0	0	0	0	0	0	0	0	26
Service Interruptions	3	11	14	0	0	0	0	0	0	0	0	14
Service Extensions	2	6	8	0	0	0	0	0	0	2	2	10
Other Payment Issues	2	4	6	0	0	0	0	0	1	0	1	7
Scheduling Delays	0	2	2	0	0	0	0	0	0	0	0	2
All Other Problems	3	6	9	0	0	0	0	0	0	0	0	9
Total	194	421	615	2	1	2	0	0	32	19	56	671

* Categories are for residential complaints opened in 2019 and evaluated by BCS as of July 10, 2020.

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

Appendix E - Table 4

Consumer Complaint Categories: 2019*

Major Local Telecommunications Utilities

Categories**	CenturyLink	Frontier Commonwealth	Verizon North	Verizon PA***	Windstream	Telecommunications Total
Unsatisfactory Service	20	80	51	340	54	545
Billing Disputes	4	9	5	27	2	47
Service Delivery	4	3	4	24	2	37
Discontinuance/Transfer	2	2	2	7	0	13
Service Terminations	1	1	2	6	3	13
Credit and Deposits	1	1	0	9	1	12
Competition	0	0	0	2	0	2
Toll Services	1	0	0	0	0	1
Annoyance Calls	0	0	0	0	0	0
Non-Recurring Charges	0	0	0	0	0	0
All Other Problems	7	21	7	17	11	63
Total	40	117	71	432	73	733

* Categories are for residential complaints opened in 2019 and evaluated by BCS as of July 10, 2020.

** 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

2017-19 Residential Consumer Complaint Statistics Major Electric Distribution Companies

Utility	2019 Residential Customers	Residential Consumer Complaints to BCS				Consumer Complaint Rates ¹			Justified Consumer Complaints					
		2017	2018	2019	% Change in # 2017-19	2017	2018	2019	Numbers ² / Rates ³ 2017		Numbers ² / Rates ³ 2018		Numbers ² / Rates ³ 2019	
Duquesne	538,534	583	596	559	-4%	1.10	1.11	1.04	41	0.08	76	0.14	66	0.12
Met-Ed	504,685	1,093	1,185	798	-27%	2.19	2.36	1.58	132*	0.26*	102*	0.20*	54*	0.11*
PECO ⁵	1,505,328	1,308	1,869	1,753	34%	0.88	1.25	1.16	69*	0.05*	237*	0.16*	77*	0.05*
Penelec	500,877	1,014	938	715	-30%	2.02	1.87	1.43	128*	0.26*	49*	0.10*	43*	0.09*
Penn Power	146,018	230	255	187	-19%	1.59	1.76	1.28	26	0.18	22	0.15	11	0.08
PPL	1,233,837	1,057	1,146	915	-13%	0.86	0.93	0.74	84*	0.07*	109*	0.09*	74*	0.06*
UGI-Electric	55,131	39	76	105	169%	0.70	1.38	1.90	5	0.09	15	0.27	15	0.27
West Penn	627,499	1,120	1,283	958	-15%	1.79	2.05	1.53	127*	0.20*	98*	0.16*	57*	0.09*
Total	5,111,909	6,444	7,348	5,990	-7%				609		708		397	
Average of Rates						1.49⁴	1.62⁴	1.25⁴		0.16⁴		0.14⁴		0.08⁴

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

² Estimated based on the number of cases in CSIS as of July 10, 2020.

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

2017-19 Residential Consumer Complaint Statistics Major Natural Gas Distribution Companies

Utility	2019 Residential Customers	Residential Consumer Complaints to BCS				Consumer Complaint Rates ¹			Justified Consumer Complaints					
		2017	2018	2019	% Change in # 2017-19	2017	2018	2019	Numbers ² / Rates ³ 2017		Numbers ² / Rates ³ 2018		Numbers ² / Rates ³ 2019	
Columbia	400,044	179	159	137	-23%	0.45	0.40	0.34	3	0.01	3	0.01	4	0.01
NFG	196,778	112	112	96	-14%	0.57	0.57	0.49	7	0.04	9	0.05	10	0.05
Peoples	335,583	206	233	227	10%	0.62	0.70	0.68	1	0.00	7	0.02	3	0.01
Peoples- Equitable	247,801	150	199	163	9%	0.61	0.80	0.66	3	0.01	10	0.04	9	0.04
PGW	480,347	980	1,054	920	-6%	2.06	2.21	1.92	66*	0.14*	74*	0.15*	77*	0.16*
UGI South	367,175	178	358	296	66%	0.50	0.99	0.81	9	0.03	50	0.14	33	0.09
UGI North	157,025	110	233	235	114%	0.71	1.49	1.50	6	0.04	45	0.29	25	0.16
Total	2,184,753	1,915	2,348	2,074	8%				95		198		161	
Average of Rates						0.79	1.02	0.91		0.04		0.10		0.07

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

² Estimated based on the number of cases in CSIS as of July 10, 2020.

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

* Based on a probability sample of cases.

Appendix F - Table 3

2017-19 Residential Consumer Complaint Statistics

Major Water Utilities

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Utility	2019 Residential Customers	Residential Consumer Complaints to BCS				Consumer Complaint Rates ¹			Justified Consumer Complaints					
		2017	2018	2019	% Change in # 2017-19	2017	2018	2019	Numbers ² / Rates ³ 2017		Numbers ² / Rates ³ 2018		Numbers ² / Rates ³ 2019	
Aqua	404,017	255	294	249	-2%	0.64	0.73	0.62	76	0.19	64	0.16	36	0.09
PAWC	613,434	542	755	575	6%	0.89	1.24	0.94	85	0.14	129*	0.21*	94	0.15
Large Class A Total	1,017,451	797	1,049	824	3%				161		193		130	
Large Class A Average of Rates						0.77	0.99	0.78		0.17		0.19		0.12
Audubon	2,712	0	1	2	n/a	0.00	0.37	0.74	0	0.00	0	0.00	0	0.00
Columbia	9,733	3	2	1	-67%	0.31	0.21	0.10	0	0.00	0	0.00	0	0.00
Community Utilities ⁴	2,632	n/a	5	2	n/a	n/a	1.91	0.76	n/a	n/a	0	0.00	0	0.00
Newtown Artesian	9,625	0	1	0	0%	0.00	0.11	0.00	0	0.00	1	0.11	0	0.00
SUEZ Bethel	2,462	0	0	0	0%	0.00	0.00	0.00	0	0.00	0	0.00	0	0.00
SUEZ PA	56,266	27	40	34	26%	0.54	0.73	0.60	1	0.02	8	0.15	3	0.05
York	62,128	15	24	20	33%	0.25	0.39	0.32	0	0.00	1	0.02	1	0.02
“Other Class A” Total	145,558	45	73	59	31%				1		10		4	
“Other Class A” Avg. of Rates⁵						0.33	0.51	0.41		0.01		0.07		0.03
All Class A Total	1,163,009	842	1,122	883	5%				162		203		134	
All Class A Average of Rates⁶						0.62	0.83	0.65		0.11		0.15		0.09

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

² Estimated based on the number of cases in CSIS as of July 10, 2020.

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

⁴ Community Utilities was reclassified as a Class A water utility in 2018.

⁵ Calculated based on the rate of “Other Class A” utilities as a whole.

⁶ Calculated based on the rates of Aqua, PAWC and “Other Class A” utilities as a whole.

Appendix F - Table 4

2017-19 Residential Consumer Complaint Statistics Major Local Telecommunications Utilities

Utility	2019 Residential Customers	Residential Consumer Complaints to BCS				Consumer Complaint Rates ¹			Justified Consumer Complaints					
		2017	2018	2019	% Change in # 2017-19	2017	2018	2019	Numbers ² / Rates ³ 2017		Numbers ² / Rates ³ 2018		Numbers ² / Rates ³ 2019	
CenturyLink	107,497	92	168	48	-48%	0.72	1.47	0.45	39	0.31	108	0.94	19	0.18
Frontier Commonwealth	79,861	113	145	138	22%	1.19	1.66	1.73	74	0.78	97	1.11	93	1.16
Verizon North	113,253	52	69	82	58%	0.41	0.64	0.72	20	0.16	39	0.36	51	0.45
Verizon PA	550,138	877	1,051	839	-4%	1.40	2.06	1.53	379*	0.60*	596*	1.17*	550*	1.00*
Windstream	75,613	144	162	85	-41%	1.72	2.07	1.12	99	1.18	111	1.42	48	0.63
Total	926,362	1,278	1,595	1,192	-7%				611		951		761	
Average of Rates						1.09	1.58	1.11		0.61		1.00		0.69

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

² Estimated based on the number of cases in CSIS as of July 10, 2020.

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

* Based on a probability sample of cases.

Appendix G - Table 1

2017-19 Residential Payment Arrangement Request (PAR) Statistics Major Electric Distribution Companies

Utility	2019 Residential Customers	Residential PARs to BCS				PAR Rates ¹			Justified PARs					
		2017	2018	2019	% Change in # 2017-19	2017	2018	2019	Numbers ² / Rates ³ 2017		Numbers ² / Rates ³ 2018		Numbers ² / Rates ³ 2019	
Duquesne	538,534	1,784	2,178	1,755	-2%	3.35	4.07	3.26	125	0.23	198	0.37	208	0.39
Met-Ed	504,685	3,706	3,865	3,711	<1%	7.42	7.07	7.35	500	1.00	418	0.83	507	1.00
PECO ⁵	1,505,328	5,831	6,349	6,696	15%	3.94	4.25	4.45	605	0.41	933	0.63	1,142	0.76
Penelec	500,877	4,042	4,061	4,048	<1%	8.06	8.10	8.08	446	0.89	547	1.09	521	1.04
Penn Power	146,018	1,169	1,091	1,212	4%	8.10	7.51	8.30	131	0.91	147	1.01	150	1.03
PPL	1,233,837	9,445	9,084	7,413	-22%	7.72	7.40	6.01	1,149	0.94	1,014	0.83	749	0.61
UGI-Electric	55,131	348	469	549	58%	6.25	8.49	9.96	30	0.54	57	1.03	74	1.34
West Penn	627,499	3,425	4,010	4,286	25%	5.48	6.40	6.83	234	0.37	355	0.57	523	0.83
Total	5,111,909	29,750	31,107	29,670	-<1%				3,220		3,669		3,874	
Average of Rates						6.30⁴	6.49⁴	6.33⁴		0.68⁴		0.76⁴		0.81⁴

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

² With the exception of UGI-Electric, each utility'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 July 10, 2020.

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

2017-19 Residential Payment Arrangement Request (PAR) Statistics Major Natural Gas Distribution Companies

Utility	2019 Residential Customers	Residential PARs to BCS				PAR Rates ¹			Justified PARs					
		2017	2018	2019	% Change in # 2017-19	2017	2018	2019	Numbers ² / Rates ³ 2017		Numbers ² / Rates ³ 2018		Numbers ² / Rates ³ 2019	
Columbia	400,044	553	535	469	-15%	1.41	1.35	1.17	6	0.02	9	0.02	12	0.03
NFG	196,778	540	587	610	13%	2.74	2.98	3.10	21	0.11	45	0.23	48	0.24
Peoples	335,583	661	710	870	32%	1.98	2.12	2.59	23	0.07	50	0.15	63*	0.19*
Peoples-Equitable	247,801	524	616	685	31%	2.11	2.48	2.76	22	0.09	38	0.15	49	0.20
PGW	480,347	7,701	6,112	4,739	-39%	16.21	12.80	9.87	381*	0.80*	610*	1.28*	508*	1.06*
UGI South	367,175	1,310	2,305	2,330	78%	3.71	6.37	6.35	98*	0.28*	228*	0.63*	274*	0.75*
UGI North	157,025	721	1,418	1,505	109%	4.67	9.06	9.58	43	0.28	221*	1.41*	161*	1.03*
Total	2,184,753	12,010	12,283	11,208	-7%				594		1,201		1,115	
Average of Rates						4.69	5.31	5.06		0.23		0.55		0.50

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 July 10, 2020.

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

* Estimated based on a probability sample of cases.

Appendix G - Table 3

2017-19 Residential Payment Arrangement Request (PAR) Statistics

Major Water Utilities

Utility	2019 Residential Customers	Residential PARs to BCS				PAR Rates ¹			Justified PARs					
		2017	2018	2019	% Change in # 2017-19	2017	2018	2019	Numbers ² / Rates ³ 2017		Numbers ² / Rates ³ 2018		Numbers ² / Rates ³ 2019	
Aqua	404,017	639	591	529	-17%	1.60	1.47	1.31	52	0.13	58	0.14	45	0.11
PAWC	613,434	2,687	3,248	2,766	3%	4.43	5.33	4.51	463*	0.76*	642*	1.05*	669*	1.09*
Large Class A Total	1,017,451	3,326	3,839	3,295	-1%				515		700		714	
Large Class A Average of Rates						3.02	3.40	2.91		0.45		0.60		0.60
Audubon	2,712	1	1	0	-100%	0.39	0.37	0.00	0	0.00	0	0.00	0	0.00
Columbia	9,733	29	28	30	3%	3.02	2.90	3.08	0	0.00	0	0.00	0	0.00
Community Utilities ⁴	2,632	n/a	4	2	n/a	n/a	1.52	0.76	n/a	n/a	0	0.00	0	0.00
Newtown Artesian	9,625	1	0	1	0%	0.10	0.00	0.10	0	0.00	0	0.00	0	0.00
SUEZ Bethel	2,462	0	0	0	0%	0.00	0.00	0.00	0	0.00	0	0.00	0	0.00
SUEZ PA	56,266	51	52	48	-6%	1.02	0.95	0.85	4	0.08	2	0.04	0	0.00
York	62,128	98	81	80	-18%	1.61	1.31	1.29	0	0.00	3	0.05	2	0.03
“Other Class A” Total	145,558	180	166	161	-11%				4		5		2	
“Other Class A” Avg. of Rates⁵						1.34	1.16			0.03		0.03		0.01
All Class A Total	1,163,009	3,506	4,005	3,456	-1%				519		705			
All Class A Average of Rates⁶						2.46	2.65			0.31		0.41		0.41

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 July 10, 2020.

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

⁴ Community Utilities was reclassified as a Class A water utility in 2018.

⁵ Calculated based on the rate of “Other Class A” utilities as a whole.

⁶ Calculated based on the rates of Aqua, PAWC and “Other Class A” utilities as a whole.

* Based on a probability sample of cases.

Appendix G - Table 4

2017-19 Residential Payment Agreement Request (PAR) Statistics Major Local Telecommunications Utilities

Utility	2019 Residential Customers	Residential PARs to BCS				PAR Rates ¹			Justified PARs					
		2017	2018	2019	% Change in # 2017-19	2017	2018	2019	Numbers ² / Rates ³ 2017		Numbers ² / Rates ³ 2018		Numbers ² / Rates ³ 2019	
CenturyLink	107,497	5	3	6	20%	0.04	0.03	0.06	1	0.01	0	0.00	0	0.00
Frontier Commonwealth	79,861	8	3	2	-75%	0.08	0.03	0.03	1	0.01	2	0.02	1	0.01
Verizon North	113,253	0	2	1	n/a	0.00	0.02	0.01	0	0.00	0	0.00	0	0.00
Verizon PA	550,138	38	21	10	-74%	0.06	0.04	0.02	1	0.00	1	0.00	2	0.00
Windstream	75,613	6	3	0	-100%	0.07	0.04	0.00	2	0.02	0	0.00	0	0.00
Total	926,362	57	32	19	-67%				5		3		3	
Average of Rates						0.05	0.03	0.02		0.01		0.00		0.00

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

² Estimated based on the number of cases in CSIS as of July 10, 2020.

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

Appendix H – Table 1

Chapter 56, Chapter 14 and Other Infraction Categories: 2019* 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)-(8), 56.15, 56.21, 56.22, 56.24 and 56.25)	6	7%	7	11%	4	9%	1	2%	0	0%	5	7%	0	0%	1	2%
Meter Reading (56.12(1)-(6))	0	0%	1	2%	0	0%	0	0%	0	0%	8	12%	0	0%	2	3%
Make-Up Bills (56.14, 57.24, 59.22 and 65.9)	2	2%	0	0%	0	0%	0	0%	0	0%	1	1%	1	4%	1	2%
Transfer of Accounts (56.16, 56.36(b)(3) and 56.72)	0	0%	2	3%	0	0%	1	2%	0	0%	0	0%	0	0%	1	2%
Credit Standards and Deposits (56.31-35, 56.36(b)(1)-(2), 56.37, 56.38, 56.41, 56.42, 56.51, 56.53 and 1404)	45	52%	18	28%	6	13%	18	34%	9	41%	4	6%	8	29%	23	39%
Termination Grounds (56.2-Def. of Delinquent Acct. and 56.81-83)	2	2%	3	5%	2	4%	0	0%	0	0%	11	16%	2	7%	1	2%
Termination Procedures (56.91-97, 56.99, 56.100, 56.111, 56.112, 56.114, 56.340 and 1406)	2	2%	3	5%	5	11%	7	13%	3	14%	4	6%	3	11%	2	3%
Reconnection of Service (56.115, 56.191(a)-(c), 56.421 and 1407)	2	2%	2	3%	4	9%	3	6%	1	5%	5	7%	0	0%	6	10%
Liability - Responsibility for Bills (56.2-Def. of Applicant, 56.2-Def. of Customer, 56.191(d)-(e) and 56.285)	2	2%	0	0%	1	2%	0	0%	0	0%	2	3%	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)	15	17%	23	35%	18	40%	20	38%	8	36%	20	29%	12	43%	17	29%
Other (54.73, 56.1, 56.202, 62.4, 1410.1, 1501 and Tariff)	10	12%	6	9%	5	11%	3	6%	1	5%	9	13%	2	7%	5	8%
Total	86		65		45		53		22		69		28		59	

* # equals the number of verified infractions identified by BCS as of Sept. 11, 2020.

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

+ PECO statistics include electric and gas.

Appendix H – Table 2

Chapter 56, Chapter 14 and Other Infraction Categories: 2019* Major Natural Gas Distribution Companies

Description	Columbia		NFG		Peoples		Peoples-Equitable		PGW		UGI South		UGI North	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Billing and Payment (56.2-Def. of Billing Month, 56.2-Def. of Billing Period, 56.11, 56.12(7)-(8), 56.15, 56.21, 56.22, 56.24 and 56.25)	0	0%	3	23%	0	0%	0	0%	8	9%	5	10%	1	3%
Meter Reading (56.12(1)-(6))	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Make-Up Bills (56.14, 57.24, 59.22 and 65.9)	0	0%	0	0%	0	0%	0	0%	5	6%	2	4%	0	0%
Transfer of Accounts (56.16, 56.36(b)(3) and 56.72)	0	0%	0	0%	0	0%	1	13%	2	2%	3	6%	2	5%
Credit Standards and Deposits (56.31-35, 56.36(b)(1)-(2), 56.37, 56.38, 56.41, 56.42, 56.51, 56.53 and 1404)	1	50%	5	38%	0	0%	3	38%	6	7%	16	32%	8	21%
Termination Grounds (56.2-Def. of Delinquent Acct. and 56.81-83)	0	0%	0	0%	0	0%	0	0%	5	6%	5	10%	6	16%
Termination Procedures (56.91-97, 56.99, 56.100, 56.111, 56.112, 56.114, 56.340 and 1406)	0	0%	0	0%	0	0%	1	13%	4	4%	3	6%	2	5%
Reconnection of Service (56.115, 56.191(a)-(c), 56.421 and 1407)	0	0%	1	8%	0	0%	1	13%	5	6%	2	4%	3	8%
Liability - Responsibility for Bills (56.2-Def. of Applicant, 56.2-Def. of Customer, 56.191(d)-(e) and 56.285)	0	0%	0	0%	0	0%	0	0%	1	1%	0	0%	0	0%
Landlord/Ratepayer (1521-1533)	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)	1	50%	0	0%	2	50%	2	25%	37	41%	14	28%	13	34%
Other (54.73, 56.1, 59.36, 62.4 and 1501)	0	0%	4	31%	2	50%	0	0%	17	19%	0	0%	3	8%
Total	2		13		4		8		90		50		38	

* # equals the number of verified infractions identified by BCS as of Sept. 11, 2020.

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

Appendix H - Table 3

Chapter 56, Chapter 14 and Other Infraction Categories: 2019* Major Water Utilities

Description	Aqua		PAWC		Audubon		Columbia		Community Utilities		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)-(8), 56.15, 56.21, 56.22, 56.24 and 56.25)	0	0%	7	5%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	1	100%
Meter Reading (56.12(1)-(6))	0	0%	1	1%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Make-Up Bills (56.14, 57.24, 59.22 and 65.9)	6	10%	7	5%	0	0%	0	0%	0	0%	0	0%	0	0%	3	43%	0	0%
Transfer of Accounts (56.16, 56.36(b)(3) and 56.72)	1	2%	2	1%	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, 56.38, 56.41, 56.42, 56.51, 56.53 and 1404)	2	3%	20	14%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Termination Grounds (56.2-Def. of Delinquent Acct. and 56.81-83)	4	7%	7	5%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Termination Procedures (56.91-97, 56.99, 56.100, 56.111, 56.112, 56.114, 56.340 and 1406)	3	5%	8	6%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Reconnection of Service (56.115, 56.191(a)-(c), 56.421 and 1407)	2	3%	8	6%	0	0%	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, 56.191(d)-(e) and 56.285)	1	2%	1	1%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Landlord/Ratepayer (1521-1533)	0	0%	2	1%	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)	32	55%	71	51%	0	0%	0	0%	0	0%	0	0%	0	0%	1	14%	0	0%
Other (56.1, 56.71 and 65.3)	7	12%	4	3%	0	0%	0	0%	0	0%	0	0%	0	0%	3	43%	0	0%
Total	58		138		0		0		0		0		0		7		1	

* # equals the number of verified infractions identified by BCS as of Sept. 11, 2020.

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

Appendix H – Table 4

Chapter 30, Chapter 63, Chapter 64 and Other Infraction Categories: 2019*

Major Local Telecommunications Utilities

Description	CenturyLink		Frontier Commonwealth		Verizon North		Verizon PA		Windstream	
	#	%	#	%	#	%	#	%	#	%
Broadband (3012-Def. of Broadband)	3	9%	4	1%	2	1%	7	0%	1	1%
Network Modernization Plans (3014)	0	0%	11	2%	1	0%	16	1%	4	2%
Complaint Procedures (63.1, 63.15 and 63.59)	8	24%	79	17%	31	15%	294	18%	52	27%
Quality of Service (63.14, 63.23, 63.53 and 63.63)	1	3%	27	6%	14	7%	130	8%	43	23%
Service Records (63.22)	3	9%	145	31%	42	20%	343	21%	29	15%
Customer Trouble Reports (63.24 and 63.57)	8	24%	131	28%	80	38%	615	38%	27	14%
Installation of Service (63.58)	1	3%	2	0%	1	0%	4	0%	3	2%
Migration (63.201-221)	0	0%	0	0%	0	0%	2	0%	0	0%
Billing and Payment (53.85, 64.1, 64.12-14, 64.16, 64.18-19, 64.24 and 64.53)	0	0%	10	2%	5	2%	12	1%	2	1%
Slamming and Cramming (64.23)	0	0%	0	0%	0	0%	0	0%	0	0%
Credit and Deposits (64.32-34 and 64.36)	5	15%	0	0%	0	0%	0	0%	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)	0	0%	4	1%	0	0%	0	0%	0	0%
Dispute Procedures (64.2 Def. of Dispute, 64.141, 64.142, 64.153 and 64.191)	2	6%	30	6%	25	12%	79	5%	5	3%
Other (63.21(a), 63.65(4), 501(c) and 1501)	3	9%	23	5%	11	5%	110	7%	24	13%
Total	34		466		212		1,612		190	

* # equals the number of verified infractions identified by BCS as of Sept. 10, 2020.

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

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

**Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120**

Information about the PUC is available on the internet:

www.puc.pa.gov





The Pennsylvania Public Utility Commission
400 North Street, Harrisburg, PA 17120
www.puc.pa.gov

