Universal Service Program & Collections Performance

2021 REPORT





BUREAU OF CONSUMER SERVICES



Universal Service Programs & Collections Performance 2021

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> Bureau of Consumer Services Alexis Bechtel, Director

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1. Introduction

The Pennsylvania Public Utility Commission's (PUC's) Annual Report on 2021 Universal Service Programs and Collections Performance includes data and performance metrics for the seven major Pennsylvania electric distribution companies (EDCs) and the six major natural gas distribution companies (NGDCs), during the 2021 calendar year.

The Electricity Generation Customer Choice and Competition Act¹ and the Natural Gas Choice and Competition Act² opened the electric generation and natural gas supply markets to competition. In doing so, the General Assembly wanted to ensure that electric and natural gas service remain universally available to all customers in the state. Consequently, both Acts contain provisions relating to universal electric and gas service, and require the Commission to maintain, at a minimum, the protections, policies and services that assist low-income customers with affording electric and gas service.³ The Acts also require the Commission to ensure that universal service and energy conservation policies are appropriately funded and available in each electric and natural gas distribution territory.⁴

To assist in fulfilling its universal service obligations, the Commission established standard reporting requirements for universal service and energy conservation for both the EDCs and the NGDCs.⁵ The Universal Service and Energy Conservation Reporting Requirements (USRR) became effective Aug. 8, 1998, for EDCs and Dec. 16, 2000, for NGDCs.⁶ This data assists the Commission in monitoring the progress of the EDCs and NGDCs in achieving universal service in their respective service territories. Beginning with 2003 data, FirstEnergy Corp. requested permission to identify and report separately on the four FirstEnergy utilities: Metropolitan Edison (Met-Ed), Pennsylvania Electric (Penelec), Pennsylvania Power (Penn Power) and West Penn Power (West Penn). These reporting requirements also apply to Duquesne Light (Duquesne), PECO-Electric, PPL Electric Utilities (PPL), Columbia Gas of Pennsylvania (Columbia), National Fuel Gas (NFG), PECO-Gas, Peoples Natural Gas (Peoples),⁷ Philadelphia Gas Works (PGW)⁸ and UGI Utilities – Gas.⁹

Each year, the EDCs and NGDCs report the previous year's data by April 1. The PUC then conducts a datacleaning and error-checking process, including both written and verbal dialogue between the PUC and the reporting utilities. Uniformity issues are documented in various tables, charts and appendices and are also discussed in more detail in later chapters. The PUC continues to work with the EDCs and NGDCs to obtain uniform data that fully complies with the regulations.

Impact of Utility Mergers on Collections and Universal Service Data

Due to the Peoples Natural Gas merger, Peoples began reporting combined data as of Jan. 1, 2020; therefore, beginning in 2020, Peoples data includes the rate district formerly served by Peoples-Equitable. Likewise, due to the UGI Gas merger, UGI Utilities – Gas began reporting combined data as of Jan. 1, 2020; therefore, beginning in 2020, UGI Utilities – Gas data includes the rate districts formerly served by UGI South, UGI North and UGI Central. Prior to 2020,

⁵ 52 Pa. Code §§ 54.71-54.78, 62.1-62.8

¹ 66 Pa. C.S. §§ 2801-2815

² 66 Pa. C.S. §§ 2201-2212

³ 66 Pa. C.S. §§ 2203(7), 2802(10)

⁴ 66 Pa. C.S. §§ 2203(8), 2804(9)

⁶ 52 Pa. Code § 54.75 for EDCs and 52 Pa. Code § 62.5 for NGDCs

⁷ On Oct. 3, 2019, at Docket No. R-2018-3006818, *et al.*, the Commission approved the merger of Peoples Natural Gas' separate Peoples and Equitable rate districts into a single rate district known as Peoples Natural Gas LLC. Although this change took effect when Peoples Natural Gas LLC's amended tariff became effective on Oct. 29, 2019, data reported based on the combined rate districts did not begin until Jan. 1, 2020.

⁸ 66 Pa. C.S. § 1403 includes Philadelphia Gas Works (PGW), a city natural gas distribution operation, within the category of natural gas distribution utilities.

⁹ On Oct. 4, 2019, at Docket No. R-2018-3006814, *et al.*, the Commission approved the merger of of the UGI Utilities, Inc. separate rate districts – UGI South, UGI North and UGI Central – into one rate district existing as UGI Utilities, Inc. – Gas Division. Although this change took effect when UGI's amended tariff became effective on Oct. 11, 2019, data reported based on the combined rate districts did not begin until Jan. 1, 2020.

UGI Utiliities was not required to report collections and universal service data for the rate district formerly served by UGI Central. Therefore, the 2020 and 2021 data for UGI Utilities – Gas is not comparable to combined data reported by UGI South and UGI North in 2019.

Treatment of Confirmed Low-Income Data Among the Collections Performance Data

A low-income customer is defined as one whose household income is at or below 150% of the federal poverty income guidelines (FPIG).¹⁰ A low-income customer is classified as confirmed low-income after their public utility has obtained information that would reasonably place them within this FPIG level. Most confirmed low-income households are verified through the customer's receipt of a Low Income Home Energy Assistance Program¹¹ (LIHEAP) grant, enrollment in a universal service program or determined during the course of making a payment arrangement. We have included collection data about confirmed low-income customers for only a select number of collections performance metrics. The confirmed low-income data tables are subsets of the Residential data tables appearing in Chapter 2 and are reported separately in the USRR.

Some public utilities reported a reduction in the number of customers who were confirmed low-income for 2021. Met-Ed, NFG, Penelec, Penn Power and West Penn reported that they had removed the "confirmed low-income" status from accounts if customers had not verified their household income within 24 months. Confirmed low-income customers reported for these public utilities for 2019 and 2020 may be overcounted. PGW also reports that the number of its confirmed low-income accounts has been declining, consistent with the decrease in the number of estimated low-income households in its service territory.

Universal Service Programs

Universal Service is a collective name applied to the policies, protections and services that help low-income customers maintain electric and natural gas service and includes payment assistance programs, termination of service protections, energy reduction programs and consumer education.¹² The Commission has made the Bureau of Consumer Services (BCS) responsible for monitoring and evaluating public utilities' universal service programs. The goal in monitoring these programs is to ensure they increase the effectiveness of EDC and NGDC collections while protecting the public's health and safety. There are four individual universal service programs.

The **Low-Income Usage Reduction Programs (LIURPs)** are energy conservation and education programs. 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.

Customer Assistance Programs (CAPs) are payment assistance and debt forgiveness programs for low-income households. CAPs are intended to provide more affordable monthly bills based on a set energy burden standard. CAP charges may take the form of a discounted price on actual usage on either all or a portion of the usage,¹³ a percentage of the monthly bill¹⁴ or a monthly amount that is calculated upon a percentage of the household income.¹⁵ Percentage of income plans are correlated directly to the household's income and the public utility's energy burden targets. 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 forgiven in incremental amounts over time.

¹⁰ See Appendix 3.

¹¹ LIHEAP is a federally funded program administered by the Department of Human Services (DHS) which provides grants to help low-income households meet their home heating needs.

¹² Electricity Generation Customer Choice and Competition Act at 66 Pa.C.S.A. § 2803 and Natural Gas Choice Competition Act at 66 Pa.C.S.A. § 2202.

¹³ Also referred to as a "rate discount bill."

¹⁴ Also referred to as a "percent of bill."

¹⁵ Also referred to as a "percent of income payment."

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

Hardship Funds are programs that make cash grants available to qualifying households to assist in the payment of outstanding energy debt. They are paid directly to the energy provider and generally funded through contributions made by the public that are matched by the public utility.

LIURP Regulations Review

On Dec. 16, 2016, the Commission issued a Secretarial Letter entitled *Initiative to Review and Revise the Existing Low-Income Usage Reduction Program (LIURP)* Regulations at 52 Pa. Code §§ 58.1 – 58.18, under Docket No. L-2016-2557886. The proceeding is still ongoing at the time of this publication.

CAP Policy Statement

The Commission's CAP Policy Statement was amended effective Mar. 21, 2020, pursuant to an order and annex entered on Nov. 5, 2019, and published in the *Pennsylvania Bulletin*, at 50 Pa.B 1652, on Mar. 21, 2020 (November 2019 Order and November 2019 Annex).¹⁶ The amendments include lower recommended maximum energy burden targets for electric and natural gas CAP bills.

Treatment of PECO Data

PECO serves three types of customers: those who receive only electric service (electric only); those who receive both electric and natural gas service (combination/electric and gas); and those who receive only natural gas service (gas only). PECO also reports the electric and gas data separately. In order to split the second group (combination/electric and gas) for some of the data variables, PECO uses an allocation factor consistent with PECO's 2008 natural gas base rate case. ¹⁷ The updated annual allocation factor for 2021 splits the combination group into 86% electric and 14% gas. PECO reports that it cannot accurately separate past due balances for combination/electric and gas customers by energy type. As a result, PECO Gas counts customer arrearages for both electric and natural gas service.

COVID-19 Pandemic and Utility Termination Moratorium

The EDC and NGDC data presented in this report cannot be adequately analyzed without first acknowledging the impact of the COVID-19 pandemic in 2020 and 2021. The unprecedented challenges presented by the global pandemic resulted in operational adjustments at the public utilities, which may have influenced collections and universal service metrics reported by utilities in 2020 and 2021 compared to previous years.

To address public health and safety concerns, on Mar. 6, 2020, Governor Tom Wolf issued a Proclamation of Disaster Emergency in response to the COVID-19 pandemic (*Emergency Proclamation*).¹⁸ On Mar. 13, 2020, Chairman Gladys Brown Dutrieuille issued an *Emergency Order* which prohibited jurisdictional utilities from terminating service for the duration of the *Emergency Proclamation* unless termination of service is necessary to ameliorate a safety emergency or unless otherwise determined by the Commission. The *Emergency Order* also encouraged utilities to reconnect previously terminated service if such action could be done safely.¹⁹

¹⁹ See Public Utility Service Termination Moratorium Proclamation of Disaster Emergency-COVID-19, Docket No. M-2020-3019244 (Emergency Order ratified on Mar. 26, 2020).

¹⁶ See *Final Policy Statement and Order*, Docket No. M-2019-3012599 (order and annex entered on Nov. 5, 2019).

¹⁷ See *PA PUC vs. PECO Energy Company – Gas Division*, Docket No. R-2008-2028394, *et al.* (approved by Commission Order entered on Oct. 29, 2008).

¹⁸ <u>https://www.governor.pa.gov/wp-content/uploads/2020/03/20200306-COVID19-Digital-Proclamation.pdf</u>

On Oct. 13, 2020, the Commission entered an Order modifying the *Emergency Order* by initiating Phase 2 of the public utility service termination moratorium (October 2020 Order).²⁰ The October 2020 Order lifted the termination moratorium for certain customers effective Nov. 9, 2020, but continued the termination moratorium for "protected customers" at or below 300% of the FPIG, under certain conditions, and established protections for certain residential and small business customers.

On Mar. 18, 2021, the Commission entered an Order lifting the utility service termination moratorium effective Apr. 1, 2021, and established extended payment arrangement terms for residential and small business customers of all electric, natural gas and water utilities subject to the Commission's jurisdiction.²¹ The requirement that public utilities offer extended payment arrangement terms expired on Sept. 30, 2021.²²

Collections and universal service metrics were impacted in 2020 and 2021 due to the direct and indirect effects of the COVID-19 pandemic and efforts to address the public health crisis. This includes EDCs and NGDCs conducting fewer terminations and reconnections in 2020 compared to previous years. EDCs and NGDCs also helped customers obtain or maintain assistance during the pandemic by temporarily waiving documentation requirements and expanding income eligibility for some universal service programs,²³ which may have increased program participation compared to prior years. The COVID-19 pandemic may have impacted other 2020 and 2021 collections and universal service programs performance metrics as well, such as payment arrangements, customer arrears and jobs performed in LIURP. Finally, additional assistance monies made available through direct stimulus payments and new funding for existing and temporary programs (*e.g.*, LIHEAP and the *Emergency Rental Assistance Program*) via the *American Rescue Plan Act of 2021* may have decreased the number of payment arrangements and arrears of confirmed low-income customers for some public utilities in 2021.

New for 2021

New or consolidated tables have been added to this report to provide additional detail and historical context to the data provided by public utilities. The following tables include added or consolidated data for 2021:

Number of Residential and Confirmed Low-Income Customers

- Confirmed Low-Income Customers 2019-2021
- Estimated Low-Income Customers 2019-2021

Termination of Service

- Terminations Residential Customers 2019-2021
- Terminations Confirmed Low-Income Customers 2019-2021

²⁰ See *Public Utility Service Termination Moratorium - Modification of March 13th Emergency Order*, Docket No. M-2020-3019244 (Order entered on Oct. 13, 2020).

²¹ See Public Utility Service Termination Moratorium, Docket No. M-2020-3019244 (Order entered on Mar. 18, 2021).

²² See Public Utility Service Moratorium; COVID-19 Cost Tracking and Creation of Regulatory Asset & Suspension of Regulatory and Statutory Deadlines; Modification Filing and Service Requirements, Docket Nos. M-2020-3019244 and M-2020-3019262 (Statement issued July 15, 2021).

²³ For example: See PPL Petition at Docket No. M-2016-2554787 (Secretarial Letter issued on Mar. 30, 2020); and Duquesne Petition at Docket Nos. M-2016-2534323 and P-2020-3019460 (Secretarial Letter issued on Apr. 17, 2020).

Reconnection of Service

- Reconnections Residential Customers 2019-2021
- Reconnections Confirmed Low-Income Customers 2019-2021

Number of Customers in Debt

- Residential Customers in Debt 2021
- Confirmed Low-Income Customers in Debt 2021
- Residential Customers in Debt 2019-2021
- Confirmed Low-Income Customers in Debt 2019-2021

Residential Customer Dollars in Debt

• Percent of Dollars in Debt – Confirmed Low-Income Customers – 2019-2021

Accounts Exceeding \$10,000 in Arrearages

- Total Number of Accounts Over \$10,000 Customers 2019-2021
- Percent of Accounts Over \$10,000 Confirmed Low-Income Customers 2019-2021
- Confirmed Low-Income Total Arrearages of Accounts Over \$10,000 Customers 2019-2021
- Percent of Arrearages Over \$10,000 Confirmed Low-Income Customers 2019-2021
- Confirmed Low-Income Average Arrearage of Accounts Over \$10,000 Customers 2019-2021

Gross Residential Write-Offs in Dollars

• Percentage of Gross Write-Offs – Confirmed Low-Income Customers – 2019-2021

Gross Write-Offs Ratio

• Gross Write-Offs Ratio – Confirmed Low-Income Customers – 2019-2021

Annual Collection Operating Expenses

- Annual Residential Collection Operating Expenses 2019-2021
- Annual Confirmed Low-Income Collection Operating Expenses 2019-2021

CAP Costs

- Electric Total CAP Spending by CAP Component CAP Administrative Costs 2019-2021
- Electric Total CAP Spending by CAP Component CAP Credits 2019-2021
- Electric Total CAP Spending by CAP Component CAP Arrearage Forgiveness 2019-2021
- Natural Gas Total CAP Spending by CAP Component CAP Administrative Costs 2019-2021
- Natural Gas Total CAP Spending by CAP Component CAP Credits 2019-2021
- Natural Gas Total CAP Spending by CAP Component CAP Arrearage Forgiveness 2019-2021

2. Collection Performance

The regulations require EDCs and NGDCs to report various residential and confirmed low-income collection data. The following report reviews each of the collection metrics and uses the data to arrive at calculated variables that are more useful in analyzing trends in collection performance. All of the data and statistics used in this chapter are drawn from information submitted by the EDCs and NGDCs. It is also important to note that we have reflected both the number of confirmed low-income customers and the number of estimated low-income customers in a public utility's given service territory. **Industry averages may be calculated based on category totals and may not represent an average of counts shown in the tables. Additionally, some totals may be affected by rounding.**

Number of Residential and Confirmed Low-Income Customers

The number of residential customers represents an average of the 12 months of month-end data reported by the EDCs and NGDCs. The data includes all residential customers, including universal service program recipients. The number of confirmed low-income customers represents the number of residential customers that have been determined low-income by the public utility.

Utility	2019 Residential Customers	2020 Residential Customers	2021 Residential Customers
Duquesne	538,534	541,210	543,300
Met-Ed	Met-Ed 504,684		512,216
PECO-Electric	1,488,812	1,502,478	1,513,368
Penelec	500,877	501,634	501,816
Penn Power	146,017	147,020	148,138
PPL	1,233,836	1,243,502	1,251,196
West Penn	627,499	630,038	632,415
Total/Industry Average	5,040,259	5,074,636	5,102,449

Number of Residential Electric Customers – 2019-2021

Number of Residential Natural Gas Customers - 2019-2021

Utility	2019 Residential Customers	2020 Residential Customers	2021 Residential Customers
Columbia	400,043	405,653	407,892
NFG	196,778	197,945	198,007
PECO-Gas	484,678	490,074	495,160
Peoples*	335,583	591,996	593,089
Peoples-Equitable*	247,801	n/a	n/a
PGW	480,347	486,934	488,817
UGI Utilities – Gas*	n/a	604,375	611,631
UGI South	367,175	n/a	n/a
UGI North	157,025	n/a	n/a
Total/Industry Average*	2,669,430	2,776,977	2,794,595

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

Confirmed Low-Income Electric Customers – 2021

Utility	Number of Confirmed Low-Income Customers	Percent of Residential Customers
Duquesne	48,153	8.9%
Met-Ed	57,945	11.3%
PECO-Electric	141,040	9.3%
Penelec	72,750	14.5%
Penn Power	16,136	10.9%
PPL	196,684	15.7%
West Penn	63,110	10.0%
Total/Industry Average	595,818	11.7%

Confirmed Low-Income Natural Gas Customers – 2021

Utility	Number of Confirmed Low-Income Customers	Percent of Residential Customers
Columbia	68,168	16.7%
NFG*	22,517	11.4%
PECO-Gas	27,492	5.6%
Peoples*	108,417	18.5%
PGW	110,364	22.6%
UGI Utilities – Gas**	78,450	12.8%
Total/Industry Average*	415,408	14.9%

*See above: <u>Treatment of Confirmed Low-Income Data Among the Collections Performance Data</u>.

**See above: Impact of Utility Mergers on Collections and Universal Service Data.

Confirmed Low-Income Electric Customers – 2019-2021

114124	2019		2020		2021	
Utility	Number	Percent of Total	Number	Percent of Total	Number	Percent of Total
Duquesne	48,373	9.0%	47,619	8.8%	48,153	8.9%
Met-Ed	73,647	14.6%	73,106	14.4%	57,945	11.3%
PECO-Electric	139,655	9.4%	135,579	9.0%	141,040	9.3%
Penelec	91,350	18.2%	90,218	18.0%	72,750	14.5%
Penn Power	20,221	13.8%	19,902	13.5%	16,136	10.9%
PPL	189,683	15.4%	193,879	15.6%	196,684	15.7%
West Penn	74,203	11.8%	75,210	11.9%	63,110	10.0%
Total/Industry Average	637,132	12.6%	635,513	12.5%	595,818	11.7%

*See above: *Treatment of Confirmed Low-Income Data Among the Collections Performance Data*.

Confirmed Low-Income Natural Gas Customers – 2019-2021

	2019		2020		2021	
Utility	Number	Percent of Total	Number	Percent of Total	Number	Percent of Total
Columbia	67,582	16.9%	68,078	16.8%	68,168	16.7%
NFG*	32,282	16.4%	35,241	17.8%	22,517	11.4%
PECO-Gas	24,977	5.2%	26,216	5.3%	27,492	5.6%
Peoples**	67,718	20.2%	108,540	18.3%	108,417	18.3%
Peoples-Equitable**	41,585	16.8%	n/a	n/a	n/a	n/a
PGW*	147,014	30.6%	133,785	27.5%	110,364	22.6%
UGI Utilities – Gas**	n/a	n/a	77,553	12.8%	78,450	12.8%
UGI South	39,108	10.7%	n/a	n/a	n/a	n/a
UGI North	24,934	15.9%	n/a	n/a	n/a	n/a
Total/Industry Average*	445,200	16.7%	449,413	16.2%	415,408	14.9%

*See above: <u>Treatment of Confirmed Low-Income Data Among the Collections Performance Data</u>.

**See above: Impact of Utility Mergers on Collections and Universal Service Data.

The number of estimated low-income customers represents the public utility's approximation of its total (maximum) population of low-income customers in its service territory and is based on the latest census data available at the time of reporting. Census data is compiled by Pennsylvania State University annually and sent to the Commission for distribution to the EDCs and NGDCs for use in determining the estimated number of low-income customers.

Estimated Low-Income Electric Customers – 2021

Utility	Number of Estimated Low-Income Customers	Estimated Percent of Residential Customers
Duquesne	121,772	22.4%
Met-Ed	109,201	21.3%
PECO-Electric	373,840	24.7%
Penelec	146,334	29.2%
Penn Power	34,284	23.1%
PPL	337,091	26.9%
West Penn	150,562	23.8%
Total/Industry Average	1,273,084	25.0%

Estimated Low-Income Natural Gas Customers – 2021

Utility	Number of Estimated Low-Income Customers	Estimated Percent of Residential Customers
Columbia	91,855	22.5%
NFG	58,794	29.7%
PECO-Gas	78,201	15.8%
Peoples*	147,077	24.8%
PGW	187,901	38.4%
UGI Utilities – Gas*	148,690	24.3%
Total/Industry Average*	712,518	25.5%

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

Estimated Low-Income Electric Customers – 2019-2021

	2019		2020		2021	
Utility	Number	Percent of Total	Number	Percent of Total	Number	Percent of Total
Duquesne	103,720	19.3%	103,434	19.1%	121,772*	22.4%
Met-Ed	116,570	23.1%	113,660	22.3%	109,201	21.3%
PECO-Electric	393,662	26.4%	388,000	25.8%	373,840	24.7%
Penelec	155,072	31.0%	151,836	30.3%	146,334	29.2%
Penn Power	35,872	24.6%	35,146	23.9%	34,284	23.1%
PPL	269,535	21.8%	299,496	24.1%	337,091	26.9%
West Penn	157,491	25.1%	154,975	24.6%	150,562	23.8%
Total/Industry Average	1,231,922	24.4%	1,246,547	24.6%	1,273,084	25.0%

*Duquesne reports that 2019 and 2020 estimates were calculated using 2016 Census data. This may have caused the appearance of a more significant increase to the 2021 estimate, which was calculated using 2020 Census data.

Estimated Low-Income Natural Gas Customers - 2019-2021

	2019		2020		2021	
Utility	Number	Percent of Total	Number	Percent of Total	Number	Percent of Total
Columbia	97,268	24.3%	96,648	23.8%	91,855	22.5%
NFG	60,947	31.0%	59,860	30.2%	58,794	29.7%
PECO-Gas	74,914	15.5%	80,638	16.5%	78,201	15.8%
Peoples*	84,437	25.2%	152,309	25.7%	147,077	24.8%
Peoples-Equitable*	58,791	23.7%	n/a	n/a	n/a	n/a
PGW	197,855	41.2%	195,215	40.1%	187,901	38.4%
UGI Utilities – Gas*	n/a	n/a	151,918	25.1%	148,690	24.3%
UGI South	86,314	23.5%	n/a	n/a	n/a	n/a
UGI North	46,297	29.5%	n/a	n/a	n/a	n/a
Total/Industry Average*	706,823	26.5%	736,588	26.5%	712,518	25.5%

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

Payment Troubled Customers

A **payment troubled customer** is a customer who has failed to maintain one or more payment arrangements in a 1-year period.²⁴ A **payment arrangement**²⁵ is an arrangement in which a customer who admits liability for billed service is permitted to pay the unpaid balance in one or more payments. Absent a change in income, the PUC can only offer a second payment arrangement to a payment troubled customer when all "catch-up" arrears are paid, or when a previous arrangement has been satisfied.²⁶ The public utilities have no restrictions on the number or terms of any payment arrangements they may choose to offer to payment troubled customers.

The following tables reflect an average of the 12 months of month-end data reported by the EDCs and NGDCs for payment troubled customer totals, ²⁷ and include both residential and the confirmed low-income subcategory to allow for the presentation of the percent of payment troubled customers which are confirmed low-income.

²⁴ 52 Pa. Code § 54.72 or § 62.2

²⁵ 52 Pa. Code § 56.2

²⁶ 66 Pa. C.S. § 1405(d)

²⁷ 52 Pa. Code § 54.75(1)(vii) or § 62.5(a)(1)(x)

Electric Payment Troubled Customers – 2021

Utility	Residential	Confirmed Low-Income	Percent of Payment Troubled Customers which are Confirmed Low-Income	
Duquesne	1,566	333	21.3%	
Met-Ed	767	493	64.3%	
PECO-Electric	5,043	596	11.8%	
Penelec	776	531	68.4%	
Penn Power	176	118	67.0%	
PPL	180,979	64,123	35.4%	
West Penn	760	495	65.1%	
Total/Industry Average	190,065	66,688	35.1%	

Natural Gas Payment Troubled Customers - 2021

Utility	Residential	Confirmed Low-Income	Percent of Payment Troubled Customers which are Confirmed Low-Income	
Columbia	14,374	8,573	59.6%	
NFG	4,141	1,884	45.5%	
PECO-Gas	1,393	169	12.1%	
Peoples*	18,647	9,430	50.6%	
PGW	19,014	13,789	72.5%	
UGI Utilities – Gas*	14,036	13,286	94.7%	
Total/Industry Average*	71,605	47,131	65.8%	

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

Number of Payment Arrangements

The method²⁸ by which EDCs and NGDCs determine the total number of payment arrangements for reporting also takes into consideration the limitations in documenting and tracking payment arrangements. This sometimes results in treating a broken payment arrangement that is reinstated due to a "catch-up" payment as a new payment arrangement. Public utility and PUC-granted payment arrangement requests are both included in this category. However, CAP payment plans are not included in the count of payment arrangements.

The following tables reflect year-end payment arrangement totals and include both residential and confirmed low-income categories to allow for the presentation of the percent of payment arrangements which are confirmed low-income. Some public utilities report offering extended payment arrangements per the Mar. 18, 2021 Order beyond the expiration date of the requirement on Sept. 30, 2021.

²⁸ 52 Pa. Code § 54.75(1)(i) or § 62.5(a)(1)(i)

Electric Payment Arrangements – 2021

Utility	Residential	Confirmed Low-Income	Percent of Payment Arrangements which are Confirmed Low-Income	
Duquesne	44,726	8,210	18.4%	
Met-Ed	33,725	18,149	53.8%	
PECO-Electric	112,209	10,094	9.0%	
Penelec	34,438	20,398	59.2%	
Penn Power	8,078	4,673	57.8%	
PPL	142,633	91,665	64.3%	
West Penn	33,254	18,359	55.2%	
Total/Industry Average	409,063	171,548	41.9%	

Natural Gas Payment Arrangements – 2021

Utility	Residential	Confirmed Low-Income	Percent of Payment Arrangements which are Confirmed Low-Income
Columbia	28,064	16,556	59.0%
NFG	13,248	7,412	55.9%
PECO-Gas	33,771	2,553	7.6%
Peoples*	17,177	8,926	52.0%
PGW	57,234	12,253	21.4%
UGI Utilities – Gas*	21,257	19,166	90.2%
Total/Industry Average*	170,751	66,866	39.2%

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

Electric Payment Arrangements – Residential Electric Customers – 2019-2021

Utility	2019 Payment Arrangements	2020 Payment Arrangements	2021 Payment Arrangements	
Duquesne	30,880	17,124	44,726	
Met-Ed	42,338	25,161	33,725	
PECO-Electric	63,217	43,195	112,209	
Penelec	42,414	23,699	34,438	
Penn Power	9,622	5,683	8,078	
PPL	116,072	70,975	142,633	
West Penn	41,596	24,260	33,254	
Total/Industry Average	346,139	210,097	409,063	

Natural Gas Payment Arrangements – Residential Natural Gas Customers – 2019-2021

Utility	2019 Payment Arrangements	2020 Payment Arrangements	2021 Payment Arrangements	
Columbia	27,086	20,541	28,064	
NFG	18,604	6,374	13,248	
PECO-Gas	25,408	17,298	33,771	
Peoples*	13,520	13,162	17,177	
Peoples-Equitable*	10,022	n/a	n/a	
PGW	68,940	20,753	57,234	
UGI Utilities – Gas*	n/a	12,746	21,257	
UGI South	16,382	n/a	n/a	
UGI North	9,562	n/a	n/a	
Total/Industry Average*	189,524	90,874	170,751	

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

Electric Payment Arrangements – Confirmed Low-Income Electric Customers – 2019-2021

Utility	2019 Payment Arrangements	2020 Payment Arrangements	2021 Payment Arrangements
Duquesne	5,686	2,503	8,210
Met-Ed	25,996	14,257	18,149
PECO-Electric	9,275	3,565	10,094
Penelec	28,802	14,310	20,398
Penn Power	6,261	3,272	4,673
PPL	73,152	46,413	91,665
West Penn	28,802	13,578	18,359
Total/Industry Average	177,974	97,898	171,548

Natural Gas Payment Arrangements – Confirmed Low-Income Natural Gas Customers – 2019-2021

Utility	2019 Payment Arrangements	2020 Payment Arrangements	2021 Payment Arrangements	
Columbia	15,977	12,041	16,556	
NFG	9,915	3,067	7,412	
PECO-Gas	2,593	1,147	2,553	
Peoples*	6,078	5,603	8,926	
Peoples-Equitable*	4,772	n/a	n/a	
PGW	48,912	15,161	12,253	
UGI Utilities – Gas*	n/a	9,835	19,166	
UGI South	15,218	n/a	n/a	
UGI North	8,825	n/a	n/a	
Total/Industry Average*	112,290	46,854	66,866	

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

Termination of Service

Termination of public utility service is the most serious consequence of customer nonpayment and is viewed as a last resort when customers fail to meet their payment obligations. The **termination rate** is calculated by dividing the number of service terminations by the number of residential customers, allowing for a comparison of termination activities regardless of the number of residential consumers. Any significant increase in a termination rate could indicate a trend or pattern that the Commission may need to investigate.

Due to the direct and indirect effects of the COVID-19 pandemic and efforts to address the public health crisis, electric and natural gas terminations were significantly reduced for 2020. Public utilities were not permitted to terminate service beginning Mar. 13, 2020. Public utilities were only permitted to terminate non-protected customers (*e.g.*, customers with incomes exceeding 300% of the FPIG) beginning Nov. 9, 2020. Additionally, public utilities were only permitted to terminate protected customers beginning Apr. 1, 2021.

Utility	20	19	20	20	2021	
	Number	Termination Rate	Number	Termination Rate	Number	Termination Rate
Duquesne	27,688	5.1%	0	0.0%	30,945	5.7%
Met-Ed	26,076	5.2%	848	0.2%	26,941	5.3%
PECO-Electric	92,497	6.2%	80	<0.1%	76,313	5.0%
Penelec	21,065	4.2%	850	0.2%	20,354	4.1%
Penn Power	4,293	2.9%	174	0.1%	2,416	1.6%
PPL	53,340	4.3%	1,502	0.1%	30,843	2.5%
West Penn	19,743	3.1%	909	0.1%	16,147	2.6%
Total/Industry Average	244,702	4.9%	4,363	0.1%	203,959	4.0%

Terminations – Residential Natural Gas Customers – 2019-2021

	20	19	2020		2021	
Utility	Number	Termination Rate	Number	Termination Rate	Number	Termination Rate
Columbia	10,770	2.7%	12	<0.1%	9,760	2.4%
NFG	7,533	3.8%	0	0.0%	7,091	3.6%
PECO-Gas	22,036	4.5%	30	<0.1%	12,634	2.6%
Peoples*	11,255	3.4%	823	0.1%	23,754	4.0%
Peoples-Equitable*	9,444	3.4%	n/a	n/a	n/a	n/a
PGW	29,048	6.0%	0	0%	15,669	3.2%
UGI Utilities – Gas*	n/a	n/a	357	<0.1%	23,013	3.8%
UGI South**	10,657	2.9%	n/a	n/a	n/a	n/a
UGI North**	6,652	4.2%	n/a	n/a	n/a	n/a
Total/Industry Average*	107,395	4.0%	1,222	<0.1%	91,921	3.3%

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

**UGI South and UGI North performed limited credit and collection activities in early 2019 due to system conversion issues.

Terminations – Confirmed Low-Income Electric Customers – 2019-2021

Utility	20	19	2020		2021	
	Number	Termination Rate	Number	Termination Rate	Number	Termination Rate
Duquesne	6,696	13.8%	0	0.0%	7,198	14.9%
Met-Ed*	14,112	19.2%	0	0.0%	12,996	22.4%
PECO-Electric	21,081	15.1%	0	0.0%	20,901	14.8%
Penelec*	13,335	14.6%	0	0.0%	11,208	15.4%
Penn Power*	2,636	13.0%	0	0.0%	1,248	7.7%
PPL	35,659	18.8%	0	0.0%	20,182	10.3%
West Penn*	11,312	15.2%	0	0.0%	8,183	13.0%
Total/Industry Average	104,831	16.5%	0	0.0%	81,916	13.7%

*Confirmed low-income termination counts for FirstEnergy utilities may also include customers who verified their low-income income status after service termination.

Terminations – Confirmed Low-Income Natural Gas Customers – 2019-2021

	2019		2020		2021	
Utility	Number	Termination Rate	Number	Termination Rate	Number	Termination Rate
Columbia	6,067	9.0%	0	0.0%	5,475	8.0%
NFG	4,106	12.7%	0	0.0%	3,668	16.3%
PECO-Gas	4,734	19.0%	0	0.0%	3,332	12.1%
Peoples*	2,226	3.3%	0	0.0%	5,973	5.5%
Peoples-Equitable*	2,003	4.8%	n/a	n/a	n/a	n/a
PGW	19,724	13.4%	0	0.0%	7,483	6.8%
UGI Utilities – Gas*	n/a	n/a	0	0.0%	3,555	4.5%
UGI South**	1,080	2.8%	n/a	n/a	n/a	n/a
UGI North**	1,039	4.2%	n/a	n/a	n/a	n/a
Total/Industry Average*	40,979	9.2%	0	0.0%	29,486	7.1%

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

**UGI South and UGI North performed limited credit and collection activities in early 2019 due to system conversion issues. UGI also identified that the system conversion issues resulted in reporting incorrect termination data for confirmed low-income customers in 2019-20. This report contains corrected data.

Reconnection of Service

Reconnection of service occurs when customers either pay their debt in full or make a significant upfront payment to the public utility and agree to a payment arrangement for the balance owed. The **reconnection rate** is calculated by dividing the number of service reconnections by the number of terminations, allowing for a comparison of reconnection activities regardless of the number of residential consumers. The result is generally indicative of the success of a customer, whose service has been terminated, at getting service reconnected. Due to the direct and indirect effects of the COVID-19 pandemic and efforts to address the public health crisis, EDCs and NGDCs reported fewer service terminations, the reconnection rate cannot be calculated. While 2021 did see an increase in the number of terminations and reconnections to a level more in keeping with pre-2020 numbers, EDCs and NGDCs still reported fewer service terminations and reconnections in 2021 when compared to pre-2020 numbers.

Reconnections – Residential Electric Customers – 2019-2021

	2019		2020		2021	
Utility	Number	Reconnection Rate	Number	Reconnection Rate	Number	Reconnection Rate
Duquesne	21,468	77.5%	0	n/a	24,848	80.3%
Met-Ed	22,325	85.6%	485	57.2%	23,842	88.5%
PECO-Electric	78,630	85.0%	1,157	1,446.3%*	66,776	87.5%
Penelec	16,095	76.4%	480	56.5%	16,094	79.1%
Penn Power	3,449	80.3%	85	48.9%	1,844	76.3%
PPL	39,001	73.1%	840	55.9%	22,309	72.3%
West Penn	15,308	77.5%	536	59.0%	12,882	79.8%
Total/Industry Average	196,276	80.2%	3,583	82.1%	168,595	82.7%

*In 2020, public utilities were encouraged to reconnect as many customers as possible during the termination moratorium. PECO-Electric completed 1,157 reconnections and 80 terminations in 2020.

Reconnections – Residential Natural Gas Customers – 2019-2021

	2019		2020		2021	
Utility	Number	Reconnection Rate	Number	Reconnection Rate	Number	Reconnection Rate
Columbia	6,153	57.1%	235	1,958.3%*	5,503	56.4%
NFG	4,926	65.4%	167	n/a	5 <i>,</i> 095	71.0%
PECO-Gas	19,353	87.8%	162	540.0%	11,924	94.4%
Peoples*	7,648	68.0%	988	n/a	18,349	77.2%
Peoples-Equitable*	6,598	69.9%	n/a	n/a	n/a	n/a
PGW	20,986	72.2%	1,256	n/a	10,567	67.4%
UGI Utilities – Gas*	n/a	n/a	579	162.2%	17,239	74.9%
UGI South**	7,825	73.4%	n/a	n/a	n/a	n/a
UGI North**	4,839	72.7%	n/a	n/a	n/a	n/a
Total/Industry Average*	78,328	72.9%	3,387	277.2%	68,677	74.7%

*In 2020, public utilities were encouraged to reconnect as many customers as possible during the termination moratorium. Columbia Gas completed 235 reconnections and 12 terminations in 2020.

**See above: Impact of Utility Mergers on Collections and Universal Service Data.

*** UGI South and UGI North performed limited credit and collection activities in early 2019 due to system conversion issues.

Reconnections – Confirmed Low-Income Electric Customers – 2019-2021

	2019		2020		2021	
Utility	Number	Reconnection Rate	Number	Reconnection Rate	Number	Reconnection Rate
Duquesne	5,499	82.1%	0	n/a	6,042	83.9%
Met-Ed	11,242	79.7%	95	n/a	10,467	80.5%
PECO-Electric	19,165	90.9%	121	n/a	18,961	90.7%
Penelec	9,511	71.3%	98	n/a	8,128	72.5%
Penn Power	1,911	72.5%	24	n/a	856	68.6%
PPL	27,022	75.8%	0	n/a	15,544	77.0%
West Penn	8,165	72.2%	104	n/a	5,913	72.3%
Total/Industry Average	82,515	78.7%	442	n/a	65,911	80.5%

Reconnections – Confirmed Low-Income Natural Gas Customers – 2019-2021

	2019		2020		2021	
Utility	Number	Reconnection Rate	Number	Reconnection Rate	Number	Reconnection Rate
Columbia	3,134	51.7%	51	n/a	2,991	54.6%
NFG	2,920	71.1%	89	n/a	2,834	77.3%
PECO-Gas	4,234	89.4%	15	n/a	3,182	95.5%
Peoples*	1,589	71.4%	405	n/a	5,083	85.1%
Peoples-Equitable*	1,560	77.9%	n/a	n/a	n/a	n/a
PGW	15,549	78.8%	701	n/a	5,913	79.0%
UGI Utilities – Gas*	n/a	n/a	17	n/a	2,776	78.1%
UGI South**	716	66.3%	n/a	n/a	n/a	n/a
UGI North**	716	68.9%	n/a	n/a	n/a	n/a
Total/Industry Average*	30,418	74.2%	1,278	n/a	22,779	77.3%

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

**UGI South and UGI North performed limited credit and collection activities in early 2019 due to system conversion issues. UGI also identified that the system conversion issues resulted in reporting incorrect termination data for confirmed low-income customers in 2019-20. This report contains corrected data.

Number of Customers in Debt

Two categories exist for reporting utility customers in debt. The first includes customers who are on a payment arrangement and the second includes customers who are not on a payment arrangement. Those "on a payment arrangement" include both public utility and PUC-granted payment arrangements. Debt that is on a payment arrangement is considered active and is often easier to collect than debt not on a payment arrangement. Debt that is not on a payment arrangement can become "uncollectable debt." Uncollectable debt often leads to an increase in gross write-offs, which are recovered across all ratepayers in public utility rates.

Many factors affect the number of customers in debt, including customer income level and ability to pay, public utility collection practices, public utility termination practices and the affordability of customer bills. Public utility collection policies vary and therefore also influence the "overdue" or "in debt" categorization.

One of the stated purposes of the Chapter 56 regulations²⁹ is to "provide functional alternatives to termination." Customers who make a payment arrangement on an outstanding balance have acknowledged that they are aware of the outstanding debt and have avoided any imminent threat of termination.

Two factors affect the uniformity of the data reported regarding the number of overdue accounts and the dollars in debt associated with those accounts. First, EDCs and NGDCs use different methods for determining when an account is overdue. EDCs and NGDCs consider either the due date of the bill or the transmittal date of the bill to be day zero. The transmittal date is 20 days before the due date. For USRR comparative purposes, EDCs and NGDCs are requested to consider the due date as day zero and to report debt that is at least 30 days overdue.

Duquesne Light, Met-Ed, Penelec, Penn Power, West Penn, Columbia, Peoples and UGI Utilities – Gas reported according to the method requested. The variance among the other EDCs and NGDCs shows a difference of no more than 20 days from that method. PECO Electric and Gas, PPL and PGW report debt that is 10 days old, meaning these utilities are overstating the debt compared to EDCs and NGDCs that reported debt as 30 days overdue. NFG reports debt that is about 40 days old, meaning NFG is understating its debt relative to the other utilities.

The second factor affecting the arrearage data uniformity is when an EDC or NGDC moves a terminated or discontinued account from active status (included in the reporting) to inactive status (excluded from the reporting). EDC and NGDC collection policies and accounting practices affect the timing.

See Appendix 1 for a chart showing the different methods EDCs and NGDCs use to determine overdue accounts and how they compare to the preferred method (30 days overdue). See Appendix 2 for the methods EDCs and NGDCs use to determine when an account is removed from active status after termination of service or discontinuance of service.

CAP recipients are excluded from all data tables referencing the number of customers in debt, the dollars in debt and gross residential write-offs.

The number of residential and confirmed low-income customers in debt on arrangement and not on arrangement represents an average of the 12 months of month-end data reported by the EDCs and NGDCs. Total number of customers in debt may be slightly off due to rounding of figures in the categories on arrangement and not on arrangement.

The **percent of customers in debt** is a useful statistic that highlights public utility collection activity and the need for universal service programs. A public utility with a low percent of its residential customers in debt should experience better cash flow and have a better credit rating than one with a high percent of its residential customers in debt. The percent of customers in debt is calculated by dividing the number of customers in debt by the total number of residential customers. This calculation is done for both groups of customers in debt – those on a payment arrangement

²⁹ 52 Pa. Code § 56.1

and those not on a payment arrangement. The total percent of customers in debt may be slightly off due to rounding of figures in the categories on arrangement and not on arrangement.

Utility	On Arrangement		Not On Arrangement		Total in Debt	
	Number	Percent of Customers	Number	Percent of Customers	Number	Percent of Customers
Duquesne	10,292	1.9%	25,058	4.6%	35,349	6.5%
Met-Ed	19,723	3.9%	29,938	5.8%	49,662	9.7%
PECO-Electric	40,421	2.7%	77,497	5.1%	117,918	7.8%
Penelec	20,906	4.2%	33,029	6.6%	53,935	10.7%
Penn Power	5,131	3.5%	8,154	5.5%	13,285	9.0%
PPL	65,908	5.3%	115,070	9.2%	180,979	14.5%
West Penn	21,049	3.3%	36,176	5.7%	57,225	9.0%
Total/Industry Average	183,430	3.6%	324,923	6.4%	508,352	10.0%

Residential Electric Customers in Debt - 2021

Residential Natural Gas Customers in Debt - 2021

	On Arrangement		Not On Arrangement		Total in Debt	
Utility	Number	Percent of Customers	Number	Percent of Customers	Number	Percent of Customers
Columbia	14,602	3.6%	10,303	2.5%	24,904	6.1%
NFG	3,905	2.0%	12,055	6.1%	15,960	8.1%
PECO-Gas	13,692	2.8%	18,392	3.7%	32,084	6.5%
Peoples*	7,988	1.3%	27,577	4.6%	35,565	6.0%
PGW	15,896	3.3%	69,719	14.3%	85,614	17.5%
UGI Utilities – Gas*	21,330	3.5%	37,740	6.2%	59,070	9.7%
Total/Industry Average*	77,412	2.8%	175,786	6.3%	253,197	9.1%

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

Confirmed Low-Income Electric Customers in Debt – 2021

Utility	On Arrangement		Not On Arrangement		Total in Debt	
	Number	Percent of Customers	Number	Percent of Customers	Number	Percent of Customers
Duquesne	2,036	4.2%	2,991	6.2%	5,027	10.4%
Met-Ed	11,370	19.6%	16,184	27.9%	27,554	47.6%
PECO-Electric	3,539	2.5%	2,537	1.8%	6,076	4.3%
Penelec	13,086	18.0%	19,244	26.5%	32,330	44.4%
Penn Power	3,135	19.4%	4,412	27.3%	7,547	46.8%
PPL	24,349	12.4%	39,774	20.2%	64,123	32.6%
West Penn	12,348	19.6%	19,014	30.1%	31,361	49.7%
Total/Industry Average	69,863	11.7%	104,155	17.5%	174,019	29.2%

Confirmed Low-Income Natural Gas Customers in Debt - 2021

	On Arrangement		Not On Arrangement		Total in Debt	
Utility	Number	Percent of Customers	Number	Percent of Customers	Number	Percent of Customers
Columbia	7,031	10.3%	2,640	3.9%	9,671	14.2%
NFG	1,632	7.2%	3,307	14.7%	4,939	21.9%
PECO-Gas	1,141	4.1%	738	2.7%	1,879	6.8%
Peoples*	4,479	4.1%	7,330	6.8%	11,808	10.9%
PGW	5,011	4.5%	3,255	2.9%	8,266	7.5%
UGI Utilities – Gas*	19,248	24.5%	2,101	2.7%	21,349	27.2%
Total/Industry Average	38,541	9.3%	19,371	4.7%	57,912	13.9%

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

Residential Electric Customers in Debt – 2019-2021

	2019		2020		2021	
Utility	Number	Percent of Residential Customers	Number	Percent of Residential Customers	Number	Percent of Residential Customers
Duquesne	42,078	7.8%	51,002	9.4%	35,349	6.5%
Met-Ed	45,140	8.9%	52,006	10.2%	49,662	9.7%
PECO-Electric	102,667	6.9%	126,334	8.4%	117,918	7.8%
Penelec	50,830	10.1%	56,340	11.2%	53,935	10.7%
Penn Power	12,173	8.3%	13,270	9.0%	13,285	9.0%
PPL	196,086	15.9%	184,661	14.9%	180,979	14.5%
West Penn	54,081	8.6%	59,946	9.5%	57,225	9.0%
Total/Industry Average	503,055	10.0%	543,559	10.7%	508,352	10.0%

Residential Natural Gas Customers in Debt - 2019-2021

	2019		2020		2021	
Utility	Number	Percent of Residential Customers	Number	Percent of Residential Customers	Number	Percent of Residential Customers
Columbia	27,447	6.9%	30,976	7.6%	24,904	6.1%
NFG*	19,979	10.2%	20,697	10.5%	15,960	8.1%
PECO-Gas	26,294	5.4%	35,427	7.2%	32,084	6.5%
Peoples**	24,939	7.4%	49,461	8.4%	35,565	6.0%
Peoples-Equitable**	19,166	7.7%	n/a	n/a	n/a	n/a
PGW	77,829	16.2%	86,625	17.8%	85,614	17.5%
UGI Utilities – Gas**	n/a	n/a	63,925	10.6%	56,070	9.7%
UGI South	41,305	11.2%	n/a	n/a	n/a	n/a
UGI North	19,876	12.7%	n/a	n/a	n/a	n/a
Total/Industry Average	256,835	9.6%	287,111	10.3%	253,197	9.1%

*NFG reported a system error that resulted in the duplication of certain data, which included the number of customers in debt. NFG has corrected the issue and provided corrected data for 2019 and 2020.

**See above: Impact of Utility Mergers on Collections and Universal Service Data.

Confirmed Low-Income Electric Customers in Debt – 2019-2021

	2019		2020		2021	
Utility	Number	Percent of Residential Customers	Number	Percent of Residential Customers	Number	Percent of Residential Customers
Duquesne	5,205	10.8%	6,058	12.7%	5,027	10.4%
Met-Ed	22,768	30.9%	28,992	39.7%	27,554	47.6%
PECO-Electric	8,306	5.9%	6,840	5.0%	6,076	4.3%
Penelec	28,371	31.1%	34,119	37.8%	32,330	44.4%
Penn Power	6,414	31.7%	7,603	38.2%	7,547	46.8%
PPL	63,708	33.6%	63,617	32.8%	64,123	32.6%
West Penn	25,646	34.6%	32,669	43.4%	31,361	49.7%
Total/Industry Average	160,418	25.2%	179,898	28.3%	174,019	29.2%

Confirmed Low-Income Natural Gas Customers in Debt – 2019-2021

	20	19	20	20	20	21
Utility	Number	Percent of Residential Customers	Number	Percent of Residential Customers	Number	Percent of Residential Customers
Columbia	10,992	16.3%	12,096	17.8%	9,671	14.2%
NFG*	n/a	n/a	n/a	n/a	4,939	21.9%
PECO-Gas	2,300	9.2%	2,189	8.3%	1,879	6.8%
Peoples**	8,795	13.0%	17,113	15.8%	11,808	10.9%
Peoples-Equitable**	6,385	15.4%	n/a	n/a	n/a	n/a
PGW ***	15,119	10.3%	9,215	6.9%	8,266	7.5%
UGI Utilities – Gas**	n/a	n/a	25,872	33.4%	21,349	27.2%
UGI South	14,612	37.4%	n/a	n/a	n/a	n/a
UGI North	8,374	33.6%	n/a	n/a	n/a	n/a
Total/Industry Average	66,577	15.0%	66,485	14.8%	57,912	13.9%

*NFG reported a system error that resulted in the duplication of certain data, which included the number of customers in debt. NFG has corrected the issue for 2021, but was unable to provide corrected data for 2019 and 2020.

**See above: Impact of Utility Mergers on Collections and Universal Service Data.

***See above: Treatment of Confirmed Low-Income Data Among the Collections Performance Data.

Residential Customer Dollars in Debt

The amount of money owed has an impact on utility expenses, making up part of the public utility's distribution charge. Higher dollars in debt not on an **arrangement** represent a greater risk for those dollars to be uncollectable. The tables below represent a 12-month average of the totals reported at the end of each month. Total average dollars in debt may be slightly off due to rounding of figures in the categories on arrangement and not on arrangement.

Dollars in Debt – Residential Electric Customers – 2021

Utility	Dollars in Debt on an Arrangement	Dollars in Debt Not on an Arrangement	Total Dollars in Debt
Duquesne	\$11,869,260	\$9,692,202	\$21,561,462
Met-Ed	\$27,462,018	\$12,395,782	\$39,857,800
PECO-Electric	\$36,731,990	\$44,388,455	\$81,120,445
Penelec	\$31,787,956	\$14,010,388	\$45,798,344
Penn Power	\$8,138,915	\$3,721,278	\$11,860,193
PPL	\$62,558,216	\$63,433,044	\$125,991,260
West Penn	\$33,691,188	\$15,507,812	\$49,199,000
Total/Industry Average	\$212,239,544	\$163,148,960	\$375,388,503

Dollars in Debt – Residential Natural Gas Customers – 2021

Utility	Dollars in Debt on an Arrangement	Dollars in Debt Not on an Arrangement	Total Dollars in Debt
Columbia	\$15,476,376	\$4,778,270	\$20,254,646
NFG	\$2,512,437	\$4,266,300	\$6,778,738
PECO-Gas	\$15,055,863	\$15,809,530	\$30,865,393
Peoples*	\$8,488,547	\$8,102,748	\$16,591,294
PGW	\$19,907,161	\$51,031,555	\$70,938,716
UGI Utilities – Gas*	\$19,462,779	\$10,354,994	\$29,817,773
Total/Industry Average*	\$80,903,162	\$94,343,397	\$175,246,559

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

Dollars in Debt – Confirmed Low-Income Electric Customers – 2021

Utility	Dollars in Debt on an Arrangement	Dollars in Debt Not on an Arrangement	Total Dollars in Debt
Duquesne	\$2,634,775	\$2,215,958	\$4,850,734
Met-Ed	\$18,286,953	\$9,967,413	\$28,254,365
PECO-Electric	\$5,538,589	\$4,665,037	\$10,203,625
Penelec	\$22,201,454	\$11,417,427	\$33,618,880
Penn Power	\$5,506,926	\$2,894,208	\$8,401,134
PPL	\$24,936,386	\$45,967,532	\$70,903,918
West Penn	\$22,502,941	\$12,106,769	\$34,609,710
Total/Industry Average	\$101,608,023	\$89,234,344	\$190,842,367

Dollars in Debt – Confirmed Low-Income Natural Gas Customers – 2021

Utility	Dollars in Debt on an Arrangement	Dollars in Debt Not on an Arrangement	Total Dollars in Debt
Columbia	\$8,436,907	\$1,565,841	\$10,002,748
NFG	\$1,214,380	\$1,954,171	\$3,168,551
PECO-Gas	\$2,135,087	\$1,808,959	\$3,944,046
Peoples*	\$5,120,520	\$3,368,151	\$8,488,671
PGW	\$4,361,184	\$3,348,591	\$7,709,775
UGI Utilities – Gas*	\$18,174,438	\$1,186,426	\$19,360,863
Total/Industry Average	\$39,442,515	\$13,232,139	\$52,674,654

* See above: Impact of Utility Mergers on Collections and Universal Service Data.

Dollars in Debt – Residential Electric Customers – 2019-2021

Utility	2019 Total Dollars in Debt	2020 Total Dollars in Debt	2021 Total Dollars in Debt
Duquesne	\$16,130,130	\$27,810,181	\$21,561,462
Met-Ed	\$20,270,119	\$34,759,934	\$39,857,800
PECO-Electric	\$31,378,347	\$61,531,645	\$81,120,445
Penelec	\$23,838,275	\$39,215,902	\$45,798,344
Penn Power	\$6,263,993	\$9,665,159	\$11,860,193
PPL	\$84,206,219	\$111,292,761	\$125,991,260
West Penn	\$23,985,129	\$41,570,915	\$49,199,000
Total/Industry Average	\$206,072,212	\$325,846,497	\$375,388,503

Dollars in Debt – Residential Natural Gas Customers – 2019-2021

Utility	2019 Total Dollars in Debt	2020 Total Dollars in Debt	2021 Total Dollars in Debt
Columbia	\$14,939,587	\$20,631,558	\$20,254,646
NFG	\$5,442,224	\$7,348,401	\$6,778,738
PECO-Gas	\$12,005,078	\$24,104,822	\$30,865,393
Peoples*	\$6,071,462	\$22,252,666	\$16,591,294
Peoples-Equitable*	\$4,117,180	n/a	n/a
PGW	\$39,572,383	\$59,273,470	\$70,938,716
UGI Utilities – Gas*	n/a	\$30,425,652	\$29,817,773
UGI South**	\$14,055,866	n/a	n/a
UGI North**	\$8,843,538	n/a	n/a
Total/Industry Average*	\$105,047,318	\$164,036,569	\$175,246,559

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

**UGI South and UGI North performed limited credit and collection activities in early 2019 due to system conversion issues.

Dollars in Debt – Confirmed Low-Income Electric Customers – 2019-2021

Utility	2019 Total Dollars in Debt	2020 Total Dollars in Debt	2021 Total Dollars in Debt
Duquesne	\$4,369,575	\$5,723,158	\$4,850,734
Met-Ed	\$12,541,083	\$24,026,543	\$28,254,365
PECO-Electric	\$5,907,018	\$7,835,523	\$10,203,625
Penelec	\$15,800,124	\$28,459,010	\$33,618,880
Penn Power	\$3,894,634	\$6,762,422	\$8,401,134
PPL	\$43,180,611	\$58,675,440	\$70,903,918
West Penn	\$14,317,307	\$28,856,451	\$34,609,710
Total/Industry Average	\$100,010,352	\$160,338,547	\$190,842,367

Dollars in Debt – Confirmed Low-Income Natural Gas Customers – 2019-2021

Utility	2019 Total Dollars in Debt	2020 Total Dollars in Debt	2021 Total Dollars in Debt
Columbia	\$7,157,303	\$10,217,185	\$10,002,748
NFG	\$2,844,150	\$3,741,231	\$3,168,551
PECO-Gas	\$2,291,100	\$3,102,961	\$3,944,046
Peoples*	\$2,655,254	\$10,563,135	\$8,488,671
Peoples-Equitable*	\$1,734,569	n/a	n/a
PGW	\$8,589,766	\$6,530,000	\$7,709,775
UGI Utilities – Gas*	n/a	\$20,415,649	\$19,360,863
UGI South**	\$9,284,289	n/a	n/a
UGI North**	\$6,029,635	n/a	n/a
Total/Industry Average*	\$40,586,066	\$54,570,161	\$52,674,654

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

**UGI South and UGI North performed limited credit and collection activities in early 2019 due to system conversion issues.

Percent of Dollars in Debt – Confirmed Low-Income Electric Customers – 2019-2021

Utility	2019 Percent of Total Dollars in Debt	2020 Percent of Total Dollars in Debt	2021 Percent of Total Dollars in Debt
Duquesne	27.1%	20.6%	22.5%
Met-Ed	61.9%	69.1%	70.9%
PECO-Electric	18.8%	12.7%	12.6%
Penelec	66.3%	72.6%	73.4%
Penn Power	62.2%	70.0%	70.8%
PPL	51.3%	52.7%	56.3%
West Penn	59.7%	69.4%	70.3%
Total/Industry Average	48.5%	49.2%	50.8%

Percent of Dollars in Debt – Confirmed Low-Income Natural Gas Customers – 2019-2021

Utility	2019 Percent of Total Dollars in Debt	2020 Percent of Total Dollars in Debt	2021 Percent of Total Dollars in Debt
Columbia	47.9%	49.5%	49.4%
NFG	52.3%	50.9%	46.7%
PECO-Gas	19.1%	12.9%	12.8%
Peoples*	43.7%	47.5%	51.2%
Peoples-Equitable*	42.1%	n/a	n/a
PGW	21.7%	11.0%	10.9%
UGI Utilities – Gas*	n/a	67.1%	64.9%
UGI South**	66.1%	n/a	n/a
UGI North**	68.2%	n/a	n/a
Total/Industry Average*	38.6%	33.3%	30.1%

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

**UGI South and UGI North performed limited credit and collection activities in early 2019 due to system conversion issues.

Percent of Total Dollars Owed - On an Arrangement Versus Not on an Arrangement

The **percent of total dollars owed** in the two reporting categories is calculated by dividing the total dollars owed in a category by the overall total dollars owed. Higher percentages of dollars not on an arrangement represent a greater risk that the dollars will be uncollectables.

Percent of Dollars Owed on an Arrangement – Residential Electric Customers – 2021

Utility	Percent of Dollars Owed – On an Arrangement	Percent of Dollars Owed – Not on an Arrangement
Duquesne	55.0%	45.0%
Met-Ed	68.9%	31.1%
PECO-Electric	45.3%	54.7%
Penelec	69.4%	30.6%
Penn Power	68.6%	31.4%
PPL	49.7%	50.3%
West Penn	68.5%	31.5%
Total/Industry Average	56.5%	43.5%

Percent of Dollars Owed on an Arrangement – Residential Natural Gas Customers – 2021

Utility	Percent of Dollars Owed – On an Arrangement	Percent of Dollars Owed – Not on an Arrangement
Columbia	76.4%	23.6%
NFG	37.1%	62.9%
PECO-Gas	48.8%	51.2%
Peoples*	51.2%	48.8%
PGW	28.1%	71.9%
UGI Utilities – Gas*	65.3%	34.7%
Total/Industry Average*	46.2%	53.8%

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

Percent of Dollars Owed on an Arrangement – Confirmed Low-Income Electric Customers – 2021

Utility	Percent of Dollars Owed – on an Arrangement	Percent of Dollars Owed – Not on an Arrangement
Duquesne	54.3%	45.7%
Met-Ed	64.7%	35.3%
PECO-Electric	54.3%	45.7%
Penelec	66.0%	34.0%
Penn Power	65.5%	34.5%
PPL	35.2%	64.8%
West Penn	65.0%	35.0%
Total/Industry Average	53.2%	46.8%

Percent of Dollars Owed on an Arrangement – Confirmed Low-Income Natural Gas Customers – 2021

Utility	Percent of Dollars Owed – on an Arrangement	Percent of Dollars Owed – Not on an Arrangement
Columbia	84.3%	15.7%
NFG	38.3%	61.7%
PECO-Gas	54.1%	45.9%
Peoples*	60.3%	39.7%
PGW	56.6%	43.4%
UGI Utilities – Gas*	93.9%	6.1%
Total/Industry Average	74.9%	25.1%

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

Average Arrearage

Average arrearage is calculated by dividing the total dollars in debt by the number of customers in debt. This shows the average arrearage (debt) carried by each customer with an overdue balance. Larger average arrearages may take more time for customers to pay off and pose more of an uncollectable risk than smaller average arrearages. The overall average arrearage amount is based on the total dollars and number of customers in debt and does not reflect an average of the two amounts in the table below.

Utility	Average Arrearage on an Arrangement	Average Arrearage Not on an Arrangement	Overall Average Arrearage
Duquesne	\$1,153.30	\$386.80	\$609.96
Met-Ed	\$1,392.37	\$414.04	\$802.59
PECO-Electric	\$908.74	\$572.77	\$687.94
Penelec	\$1,520.54	\$424.18	\$849.14
Penn Power	\$1,586.25	\$456.38	\$892.76
PPL	\$949.17	\$551.25	\$696.17
West Penn	\$1,600.58	\$428.68	\$859.74
Total/Industry Average	\$1,157.06	\$502.12	\$738.44

Average Arrearage – Residential Electric Customers – 2021

Average Arrearage – Residential Natural Gas Customers – 2021

Utility	Average Arrearage on an Arrangement	Average Arrearage Not on an Arrangement	Overall Average Arrearage
Columbia	\$1,059.90	\$463.80	\$813.30
NFG	\$643.39	\$353.89	\$424.72
PECO-Gas	\$1,099.62	\$859.58	\$962.02
Peoples*	\$1,062.73	\$293.82	\$466.51
PGW	\$1,252.38	\$731.96	\$828.59
UGI Utilities – Gas*	\$912.46	\$274.38	\$504.79
Total/Industry Average*	\$1,045.11	\$536.70	\$692.13

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

Average Arrearage – Confirmed Low-Income Electric Customers – 2021

Utility	Average Arrearage on an Arrangement	Average Arrearage Not on an Arrangement	Overall Average Arrearage
Duquesne	\$1,293.88	\$740.92	\$964.91
Met-Ed	\$1,608.35	\$615.87	\$1,025.41
PECO-Electric	\$1,564.98	\$1,838.86	\$1,679.33
Penelec	\$1,696.58	\$593.31	\$1,039.88
Penn Power	\$1,756.69	\$655.92	\$1,113.14
PPL	\$1,024.12	\$1,155.73	\$1,105.75
West Penn	\$1,822.44	\$636.74	\$1,103.58
Total/Industry Average	\$1,454.39	\$856.74	\$1,096.68

Average Arrearage – Confirmed Low-Income Natural Gas Customers – 2021

Utility	Average Arrearage on an Arrangement	Average Arrearage Not on an Arrangement	Overall Average Arrearage
Columbia	\$1,199.96	\$593.20	\$1,034.34
NFG	\$744.11	\$590.92	\$641.54
PECO-Gas	\$1,871.93	\$2,450.07	\$2,099.11
Peoples*	\$1,143.29	\$459.52	\$718.87
PGW	\$870.40	\$1,028.73	\$932.75
UGI Utilities – Gas*	\$944.23	\$564.72	\$906.88
Total/Industry Average	\$1,023.40	\$683.10	\$909.57

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

Average Arrearage – Residential Electric Customers – 2019-2021

Utility	2019 Average Arrearage	2020 Average Arrearage	2021 Average Arrearage
Duquesne	\$383.34	\$545.28	\$609.96
Met-Ed	\$449.05	\$668.38	\$802.59
PECO-Electric	\$305.63	\$487.06	\$687.94
Penelec	\$468.98	\$696.06	\$849.14
Penn Power	\$514.58	\$728.35	\$892.76
PPL	\$429.44	\$602.69	\$696.17
West Penn	\$443.50	\$693.47	\$859.74
Total/Industry Average	\$409.64	\$599.47	\$738.44

Average Arrearage – Residential Natural Gas Customers – 2019-2021

Utility	2019 Average Arrearage	2020 Average Arrearage	2021 Average Arrearage
Columbia	\$544.31	\$666.06	\$813.30
NFG*	\$272.40	\$355.05	\$424.72
PECO-Gas	\$456.57	\$680.41	\$962.02
Peoples**	\$243.45	\$449.90	\$466.51
Peoples-Equitable**	\$214.82	n/a	n/a
PGW	\$508.45	\$684.25	\$828.59
UGI Utilities – Gas**	n/a	\$475.96	\$504.79
UGI South***	\$340.29	n/a	n/a
UGI North***	\$444.94	n/a	n/a
Total/Industry Average	\$409.01	\$571.34	\$692.13

*NFG reported a system error that resulted in the duplication of certain data, which included the number of customers in debt. NFG has corrected the issue and provided corrected data for 2019 and 2020.

**See above: Impact of Utility Mergers on Collections and Universal Service Data.

*** UGI South and UGI North performed limited credit and collection activities in early 2019 due to system conversion issues.

Average Arrearage – Confirmed Low-Income Electric Customers – 2019-2021

Utility	2019 Average Arrearage	2020 Average Arrearage	2021 Average Arrearage
Duquesne	\$839.50	\$944.73	\$964.91
Met-Ed	\$550.82	\$828.73	\$1,025.41
PECO-Electric	\$711.17	\$1,145.54	\$1,679.33
Penelec	\$556.91	\$834.11	\$1,039.88
Penn Power	\$607.21	\$889.44	\$1,113.14
PPL	\$677.79	\$922.32	\$1,105.75
West Penn	\$558.27	\$883.30	\$1,103.58
Total/Industry Average	\$623.44	\$891.27	\$1,096.68

Average Arrearage – Confirmed Low-Income Natural Gas Customers – 2019-2021

Utility	2019 Average Arrearage	2020 Average Arrearage	2021 Average Arrearage
Columbia	\$651.14	\$844.71	\$1,034.34
NFG*	n/a	n/a	\$641.54
PECO-Gas	\$996.13	\$1,417.52	\$2,099.11
Peoples**	\$301.90	\$617.26	\$718.87
Peoples-Equitable**	\$271.66	n/a	n/a
PGW	\$568.14	\$708.63	\$932.75
UGI Utilities – Gas**	n/a	\$789.10	\$906.88
UGI South***	\$635.39	n/a	n/a
UGI North***	\$720.04	n/a	n/a
Total/Industry Average	\$609.61	\$820.80	\$909.57

*NFG reported a system error that resulted in the duplication of certain data, which included the number of customers in debt. NFG has corrected the issue for 2021, but was unable to provide corrected data for 2019 and 2020.

**See above: Impact of Utility Mergers on Collections and Universal Service Data.

*** UGI South and UGI North performed limited credit and collection activities in early 2019 due to system conversion issues.

Accounts Exceeding \$10,000 in Arrearages

On Dec. 22, 2014, Act 155 reauthorized and amended Chapter 14 of the Public Utility Code (66 Pa. C.S. §§ 1401-1419), known as The Responsible Utility Customer Protection Act.³⁰ Following the implementation of Act 155, public utilities must report data regarding the number of active (*i.e.*, accounts not final billed) residential accounts that exceed \$10,000 in arrearages at the end of each calendar year, along with those account balances.³¹ We present that data in the tables below, noting that PECO has reported electric and gas accounts together. Peoples and Peoples-Equitable have always reported combined data for this metric, even prior to their merger. The average arrearage is calculated by dividing the total arrearage (sum of all account balances over \$10,000) by the number of accounts.

³⁰ Final Order Chapter 14 Implementation Docket No. M-2014-2448824, order entered July 9, 2015. Section 1410.1(3) (Public utility duties) (Reporting Requirements re: Accounts Exceeding \$10,000 in Arrearages), pp 32-33.

³¹ The public utilities report several data points under Section 1410.1(3), however, only data relevant to the Universal Service Programs & Collections Performance has been included in this report. All public utility annual 1410.1(3) reports are available at Docket No. M-2014-2448824.

Total Number of Accounts Over \$10,000 – Electric Customers – 2019-2021

	20	19	20	20	20	21
Utility	Residential	Confirmed Low- Income	Residential	Confirmed Low- Income	Residential	Confirmed Low- Income
Duquesne	25	10	99	32	106	52
Met-Ed	50	32	162	130	178	142
PECO-Electric/Gas	82	35	197	76	371	162
Penelec	86	56	224	181	245	185
Penn Power	25	16	57	46	74	55
PPL	209	128	440	62	374	247
West Penn	73	45	230	180	276	208
Total/Industry Average	550	322	1,409	707	1,624	1,051

Total Number of Accounts Over \$10,000 – Natural Gas Customers – 2019-2021

	20	19	20	20	20	21
Utility	Residential	Confirmed Low- Income	Residential	Confirmed Low- Income	Residential	Confirmed Low- Income
Columbia	1	1	3	3	0	0
NFG	0	0	0	0	0	0
Peoples/Peoples-EQT*	5	5	14	9	8	6
PGW	139	119	219	173	382	211
UGI Utilities – Gas*	n/a	n/a	7	1	11	1
UGI South	1	0	n/a	n/a	n/a	n/a
UGI North	1	1	n/a	n/a	n/a	n/a
Total/Industry Average*	147	126	243	186	401	218

Percent of Accounts Over \$10,000 – Confirmed Low-Income Electric Customers – 2019-2021

Utility	2019 Percent of Accounts Over 10k	2020 Percent of Accounts Over 10k	2021 Percent of Accounts Over 10k
Duquesne	40.0%	32.3%	49.1%
Met-Ed	64.0%	80.2%	79.8%
PECO-Electric/Gas	42.7%	38.6%	43.7%
Penelec	65.1%	80.8%	75.5%
Penn Power	64.0%	80.7%	74.3%
PPL	61.2%	14.1%	66.0%
West Penn	61.6%	78.3%	75.4%
Total/Industry Average	58.5%	50.2%	64.7%

Percent of Accounts Over \$10,000 – Confirmed Low-Income Natural Gas Customers – 2019-2021

Utility	2019 Percent of Accounts Over 10k	2020 Percent of Accounts Over 10k	2021 Percent of Accounts Over 10k
Columbia	100.0%	100.0%	0.0%
NFG	0.0%	0.0%	0.0%
Peoples/Peoples-EQT*	100.0%	64.3%	75.0%
PGW	85.6%	79.0%	55.2%
UGI Utilities – Gas*	n/a	14.3%	9.1%
UGI South	0.0%	n/a	n/a
UGI North	100.0%	n/a	n/a
Total/Industry Average*	85.7%	76.5%	54.4%

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

Residential Total Arrearages of Accounts Over \$10,000 – Electric Customers – 2019-2021

Utility	2019 Total Arrearages of Accounts over 10k	2020 Total Arrearages of Accounts over 10k	2021 Total Arrearages of Accounts over 10k
Duquesne	\$342,529	\$1,367,612	\$1,442,651
Met-Ed	\$672,880	\$2,135,811	\$2,438,091
PECO-Electric/Gas	\$1,101,520	\$2,700,673	\$4,889,390
Penelec	\$1,271,323	\$3,118,889	\$3,444,472
Penn Power	\$353,735	\$763,622	\$1,032,617
PPL	\$3,057,044	\$6,202,758	\$5,416,845
West Penn	\$957,296	\$3,057,144	\$3,774,042
Total/Industry Average	\$7,756,327	\$19,346,509	\$22,438,107

Residential Total Arrearages of Accounts Over \$10,000 – Natural Gas Customers – 2019-2021

Utility	2019 Total Arrearages of Accounts over 10k	2020 Total Arrearages of Accounts over 10k	2021 Total Arrearages of Accounts over 10k
Columbia	\$13,845	\$39,675	\$0
NFG	\$0	\$0	\$0
Peoples/Peoples-EQT*	\$55,654	\$159,802	\$83,588
PGW	\$1,724,772	\$2,754,119	\$4,765,743
UGI Utilities – Gas*	n/a	\$93,189	\$128,935
UGI South	\$14,885	n/a	n/a
UGI North	\$17,278	n/a	n/a
Total/Industry Average*	\$1,826,433	\$3,046,785	\$4,978,266

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

Confirmed Low-Income Total Arrearages of Accounts Over \$10,000 – Electric Customers – 2019-2021

Utility	2019 Total Arrearages of Accounts over 10k	2020 Total Arrearages of Accounts over 10k	2021 Total Arrearages of Accounts over 10k
Duquesne	\$140,637	\$464,353	\$700,897
Met-Ed	\$427,709	\$1,698,593	\$1,962,142
PECO-Electric/Gas	\$456,589	\$1,056,369	\$2,117,840
Penelec	\$775,394	\$2,465,183	\$2,573,405
Penn Power	\$220,107	\$614,912	\$765,520
PPL	\$1,798,244	\$872,096	\$3,442,752
West Penn	\$602,487	\$2,376,500	\$2,804,062
Total/Industry Average	\$4,421,167	\$9,548,006	\$14,366,618

Confirmed Low-Income Total Arrearages of Accounts Over \$10,000 – Natural Gas Customers – 2019-2021

Utility	2019 Total Arrearages of Accounts over 10k	2020 Total Arrearages of Accounts over 10k	2021 Total Arrearages of Accounts over 10k
Columbia	\$13,845	\$39,675	\$0
NFG	\$0	\$0	\$0
Peoples/Peoples-EQT*	\$55,654	\$101,604	\$61,743
PGW	\$1,481,164	\$2,162,920	\$2,682,886
UGI Utilities – Gas*	n/a	\$18,457	\$10,475
UGI South	\$0	n/a	n/a
UGI North	\$17,278	n/a	n/a
Total/Industry Average*	\$1,567,941	\$2,322,655	\$2,755,104

Percent of Arrearages Over \$10,000 – Confirmed Low-Income Electric Customers – 2019-2021

Utility	2019 Percent of Arrearages Over 10k	2020 Percent of Arrearages Over 10k	2021 Percent of Arrearages Over 10k
Duquesne	41.1%	34.0%	48.6%
Met-Ed	63.6%	79.5%	80.5%
PECO-Electric/Gas	41.5%	39.1%	43.3%
Penelec	61.0%	79.0%	74.7%
Penn Power	62.2%	80.5%	74.1%
PPL	58.8%	14.1%	63.6%
West Penn	62.9%	77.7%	74.3%
Total/Industry Average	57.0%	49.4%	64.0%

Percent of Arrearages Over \$10,000 – Confirmed Low-Income Natural Gas Customers – 2019-2021

Utility	2019 Percent of Accounts Over 10k	2020 Percent of Accounts Over 10k	2021 Percent of Accounts Over 10k
Columbia	100.0%	100.0%	0.0%
NFG	0.0%	0.0%	0.0%
Peoples/Peoples-EQT*	100.0%	63.6%	73.9%
PGW	85.9%	78.5%	56.3%
UGI Utilities – Gas*	n/a	19.8%	8.1%
UGI South	0.0%	n/a	n/a
UGI North	100.0%	n/a	n/a
Total/Industry Average*	85.8%	76.2%	55.3%

Residential Average Arrearage of Accounts Over \$10,000 – Electric Customers – 2019-2021

Utility	2019 Average Arrearage of Accounts over 10k	2020 Average Arrearage of Accounts over 10k	2021 Average Arrearage of Accounts over 10k
Duquesne	\$13,701.15	\$13,814.27	\$13,609.92
Met-Ed	\$13,457.59	\$13,184.02	\$13,697.14
PECO-Electric/Gas	\$13,433.17	\$13,709.00	\$13,178.95
Penelec	\$14,782.83	\$13,923.61	\$14,059.07
Penn Power	\$14,149.38	\$13,396.87	\$13,954.28
PPL	\$14,627.00	\$14,097.18	\$14,483.54
West Penn	\$13,113.65	\$13,291.93	\$13,674.07
Total/Industry Average	\$14,102.41	\$13,730.67	\$13,816.57

Residential Average Arrearage of Accounts Over \$10,000 – Natural Gas Customers – 2019-2021

Utility	2019 Average Arrearage of Accounts over 10k	2020 Average Arrearage of Accounts over 10k	2021 Average Arrearage of Accounts over 10k
Columbia	\$13,844.54	\$13,224.92	\$0.00
NFG	\$0.00	\$0.00	\$0.00
Peoples/Peoples-EQT*	\$11,130.76	\$11,414.44	\$10,448.55
PGW	\$12,408.43	\$12,575.88	\$12,475.77
UGI Utilities – Gas*	n/a	\$13,312.71	\$11,721.36
UGI South**	\$14,884.68	n/a	n/a
UGI North**	\$17,278.21	n/a	n/a
Total/Industry Average*	\$12,424.71	\$12,538.21	\$12,414.63

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

**UGI South and UGI North performed limited credit and collection activities in early 2019 due to system conversion issues.

Confirmed Low-Income Average Arrearage of Accounts Over \$10,000 – Electric Customers – 2019-2021

Utility	2019 Average Arrearage of Accounts over 10k	2020 Average Arrearage of Accounts over 10k	2021 Average Arrearage of Accounts over 10k
Duquesne	\$14,063.70	\$14,511.04	\$13,478.79
Met-Ed	\$13,365.91	\$13,066.10	\$13,817.90
PECO-Electric/Gas	\$13,045.40	\$13,899.60	\$13,073.08
Penelec	\$13,846.31	\$13,619.80	\$13,910.30
Penn Power	\$13,756.69	\$13,367.64	\$13,918.55
PPL	\$14,048.78	\$14,066.06	\$13,938.27
West Penn	\$13,388.61	\$13,202.78	\$13,481.07
Total/Industry Average	\$13,730.33	\$13,504.96	\$13,669.47

Confirmed Low-Income Average Arrearage of Accounts Over \$10,000 – Natural Gas Customers – 2019-2021

Utility	2019 Average Arrearage of Accounts over 10k	2020 Average Arrearage of Accounts over 10k	2021 Average Arrearage of Accounts over 10k
Columbia	\$13,844.54	\$13,224.92	\$0
NFG	\$0	\$0	\$0
Peoples/Peoples-EQT*	\$11,130.76	\$11,289.32	\$10,290.49
PGW	\$12,446.76	\$12,502.43	\$12,715.10
UGI Utilities – Gas*	n/a	\$18,456.63	\$10,474.61
UGI South**	\$0	n/a	n/a
UGI North**	\$17,278.21	n/a	n/a
Total/Industry Average*	\$12,443.97	\$12,487.39	\$12,638.09

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

**UGI South and UGI North performed limited credit and collection activities in early 2019 due to system conversion issues.

Revenues (Billings)

Revenues (Billings) are the cumulative, year-end total dollars billed by the public utility for the previous year and reported in the USRR for both the residential and confirmed low-income categories. Billings are used in the calculation of other collection performance metrics and include dollars collected from universal service program recipients, including CAP customers' billings.

Residential Revenues (Billings) – Electric Customers – 2021

Utility	Residential	Confirmed Low-Income	Percent Confirmed Low-Income
Duquesne	\$609,613,978	\$65,057,624	10.7%
Met-Ed	\$652,803,005	\$89,899,507	13.8%
PECO-Electric	\$2,097,763,051	\$129,941,777	6.2%
Penelec	\$582,846,673	\$104,939,383	18.0%
Penn Power	\$195,167,327	\$24,298,379	12.5%
PPL	\$2,065,591,575	\$392,429,093	19.0%
West Penn	\$669,041,945	\$83,103,083	12.4%
Total/Industry Average	\$6,872,827,554	\$889,668,846	12.9%

Residential Revenues (Billings) – Natural Gas Customers – 2021

Utility	Residential	Confirmed Low-Income	Percent Confirmed Low-Income
Columbia	\$477,280,261	\$42,914,462	9.0%
NFG	\$145,155,802	\$17,240,043	11.9%
PECO-Gas	\$409,542,939	\$17,844,026	4.4%
Peoples*	\$509,264,056	\$81,482,249	16.0%
PGW	\$521,228,457	\$101,925,912	19.6%
UGI Utilities – Gas*	\$526,986,632	\$42,926,815	8.1%
Total/Industry Average*	\$2,589,458,147	\$304,333,507	11.8%

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

Percent of Revenues (Billings) in Debt

The **percent of revenues (billings) in debt** is calculated by dividing the total annual revenues (billings) by the total monthly average dollars in debt. This calculated variable provides another way to measure the extent of customer debt. In the following two tables, the higher the percentage, the greater the potential collection risk.

Percent of Revenues (Billings) in Debt – Residential Electric Customers – 2019-2021

Utility	2019	2020	2021
Duquesne	2.9%	4.7%	3.5%
Met-Ed	3.3%	5.7%	6.1%
PECO-Electric	1.5%	3.0%	3.9%
Penelec	4.2%	6.9%	7.9%
Penn Power	3.4%	5.2%	6.1%
PPL	4.2%	5.6%	6.1%
West Penn	3.5%	6.1%	7.4%
Total/Industry Average	3.1%	4.9%	5.5%

Percent of Revenues (Billings) in Debt – Residential Natural Gas Customers – 2019-2021

Utility	2019	2020	2021
Columbia	3.5%	4.3%	4.2%
NFG	3.7%	5.6%	4.7%
PECO-Gas	2.6%	5.9%	7.5%
Peoples*	2.0%	4.7%	3.3%
Peoples-Equitable*	1.9%	n/a	n/a
PGW	7.4%	11.9%	13.6%
UGI Utilities – Gas*	n/a	6.3%	5.7%
UGI South**	5.4%	n/a	n/a
UGI North**	5.4%	n/a	n/a
Total/Industry Average*	4.2%	6.7%	6.8%

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

**UGI South and UGI North performed limited credit and collection activities in early 2019 due to system conversion issues.

Percent of Revenues (Billings) in Debt – Confirmed Low-Income Electric Customers – 2019-2021

Utility	2019	2020	2021
Duquesne	7.1%	9.1%	7.5%
Met-Ed	11.8%	25.8%	31.4%
PECO-Electric	4.3%	6.2%	7.9%
Penelec	12.6%	25.6%	32.0%
Penn Power	13.6%	26.6%	34.6%
PPL	11.6%	14.0%	18.1%
West Penn	14.1%	31.9%	41.6%
Total/Industry Average	10.7%	17.3%	21.5%

Percent of Revenues (Billings) in Debt – Confirmed Low-Income Natural Gas Customers – 2019-2021

Utility	2019	2020	2021
Columbia	9.1%	12.6%	23.3%
NFG	14.6%	21.6%	20.1%
PECO-Gas	9.7%	17.9%	22.1%
Peoples*	10.4%	24.8%	10.4%
Peoples-Equitable*	9.4%	n/a	n/a
PGW	6.4%	6.0%	7.6%
UGI Utilities – Gas*	n/a	37.1%	45.1%
UGI South**	24.8%	n/a	n/a
UGI North**	20.3%	n/a	n/a
Total/Industry Average*	11.0%	17.0%	17.4%

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

** UGI South and UGI North performed limited credit and collection activities in early 2019 due to system conversion issues.

Gross Residential Write-Offs in Dollars

The tables below represent the **gross residential write-offs in dollars** for EDCs and NGDCs. Write-offs are the last action on final-billed overdue accounts. A residential account is written off after all pre-write-off collection actions are taken and the customer fails to make payment on the balance owed. Generally, a public utility writes off accounts on either a monthly or annual basis. The gross write-offs figures do not include CAP credits or arrearage forgiveness.

Gross Write-Offs in Dollars – Electric Customers – 2021

Utility	Residential	Confirmed Low-Income	Percent Confirmed Low-Income
Duquesne	\$16,401,937	\$3,563,296	21.7%
Met-Ed	\$12,067,089	\$8,630,700	71.5%
PECO-Electric	\$31,061,824	\$4,238,342	13.6%
Penelec	\$12,539,131	\$9,341,987	74.5%
Penn Power	\$2,394,623	\$1,688,055	70.5%
PPL	\$45,878,601	\$32,498,965	70.8%
West Penn	\$10,780,567	\$7,779,493	72.2%
Total/Industry Average	\$131,123,772	\$67,740,838	51.7%

Gross Write-Offs in Dollars – Natural Gas Customers – 2021

Utility	Residential	Confirmed Low-Income	Percent Confirmed Low-Income
Columbia	\$10,761,148	\$4,750,005	44.1%
NFG	\$2,047,895	\$1,264,922	61.8%
PECO-Gas	\$1,906,534	\$444,631	23.3%
Peoples*	\$9,696,316	\$5,714,235	58.9%
PGW	\$21,599,262	\$6,423,185	29.7%
UGI Utilities – Gas*	\$16,204,625	\$605,554	3.7%
Total/Industry Average*	\$62,215,780	\$19,202,532	30.9%

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

Gross Write-Offs in Dollars – Residential Electric Customers – 2019-2021

Utility	2019 Gross Write-Offs in Dollars	2020 Gross Write-Offs in Dollars	2021 Gross Write-Offs in Dollars
Duquesne	\$14,436,076	\$13,917,013	\$16,401,937
Met-Ed	\$14,939,366	\$10,590,500	\$12,067,089
PECO-Electric	\$28,461,191	\$16,965,528	\$31,061,824
Penelec	\$15,212,941	\$11,281,446	\$12,539,131
Penn Power	\$3,448,167	\$2,406,621	\$2,394,623
PPL	\$51,249,852	\$32,110,096	\$45,878,601
West Penn	\$16,109,498	\$11,035,112	\$10,780,567
Total/Industry Average	\$143,857,091	\$98,306,316	\$131,123,772

Gross Write-Offs in Dollars – Residential Natural Gas Customers – 2019-2021

Utility	2019 Gross Write-Offs in Dollars	2020 Gross Write-Offs in Dollars	2021 Gross Write-Offs in Dollars
Columbia	\$8,903,865	\$4,204,533	\$10,761,148
NFG	\$4,166,463	\$4,079,349	\$2,047,895
PECO-Gas	\$2,184,559	\$1,397,822	\$1,906,534
Peoples*	\$9,322,215	\$11,997,515	\$9,696,316
Peoples-Equitable*	\$6,626,698	n/a	n/a
PGW	\$32,545,577	\$21,030,875	\$21,599,262
UGI Utilities – Gas*	n/a	\$10,734,440	\$16,204,625
UGI South**	\$10,153,148	n/a	n/a
UGI North**	\$5,893,436	n/a	n/a
Total/Industry Average*	\$79,795,961	\$53,444,534	\$62,215,780

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

**UGI South and UGI North performed limited credit and collection activities in early 2019 due to system conversion issues.

Gross Write-Offs in Dollars – Confirmed Low-Income Electric Customers – 2019-2021

Utility	2019 Gross Write-Offs in Dollars	2020 Gross Write-Offs in Dollars	2021 Gross Write-Offs in Dollars
Duquesne	\$3,849,895	\$4,149,205	\$3,563,296
Met-Ed	\$11,582,626	\$8,106,239	\$8,630,700
PECO-Electric	\$6,203,902	\$4,082,863	\$4,238,342
Penelec	\$12,405,094	\$8,992,717	\$9,341,987
Penn Power	\$2,754,306	\$1,897,416	\$1,688,055
PPL	\$37,274,682	\$17,018,351	\$32,498,965
West Penn	\$12,362,585	\$8,341,292	\$7,779,493
Total/Industry Average	\$86,433,090	\$52,588,083	\$67,740,838

Gross Write-Offs in Dollars – Confirmed Low-Income Natural Gas Customers – 2019-2021

Utility	2019 Gross Write-Offs in Dollars	2020 Gross Write-Offs in Dollars	2021 Gross Write-Offs in Dollars
Columbia	\$4,440,413	\$2,250,506	\$4,750,005
NFG	\$3,335,504	\$2,653,618	\$1,264,922
PECO-Gas	\$677,475	\$560,272	\$444,631
Peoples*	\$2,423,776	\$3,839,205	\$5,714,235
Peoples-Equitable*	\$1,722,941	n/a	n/a
PGW	\$29,368,288	\$8,988,079	\$6,423,185
UGI Utilities – Gas*	n/a	\$592,292	\$605,554
UGI South**	\$5,787,294	n/a	n/a
UGI North**	\$3,653,930	n/a	n/a
Total/Industry Average*	\$51,409,621	\$18,883,972	\$19,202,532

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

**UGI South and UGI North performed limited credit and collection activities in early 2019 due to system conversion issues.

Percentage of Gross Write-Offs – Confirmed Low-Income Electric Customers – 2019-2021

Utility	2019 Percent of Gross Write-Off Dollars	2020 Percent of Gross Write-Off Dollars	2021 Percent of Gross Write-Off Dollars
Duquesne	26.7%	29.8%	21.7%
Met-Ed	77.5%	76.5%	71.5%
PECO-Electric	21.8%	24.1%	13.6%
Penelec	81.5%	79.7%	74.5%
Penn Power	79.9%	78.8%	70.5%
PPL	72.7%	53.0%	70.8%
West Penn	76.7%	75.6%	72.2%
Total/Industry Average	60.1%	53.5%	51.7%

Percentage of Gross Write-Offs – Confirmed Low-Income Natural Gas Customers – 2019-2021

Utility	2019 Percent of Gross Write-Off Dollars	2020 Percent of Gross Write-Off Dollars	2021 Percent of Gross Write-Off Dollars
Columbia	49.9%	53.5%	44.1%
NFG	80.1%	65.1%	61.8%
PECO-Gas	31.0%	40.1%	23.3%
Peoples*	26.0%	32.0%	58.9%
Peoples-Equitable*	26.0%	n/a	n/a
PGW	90.2%	42.7%	29.7%
UGI Utilities – Gas*	n/a	5.5%	3.7%
UGI South**	57.0%	n/a	n/a
UGI North**	62.0%	n/a	n/a
Total/Industry Average*	64.4%	35.3%	30.9%

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

**UGI South and UGI North performed limited credit and collection activities in early 2019 due to system conversion issues.

Gross Write-Offs Ratio

The percentage of residential billings written off as uncollectable is the most commonly used long-term measure of collection system performance and is called the **gross write-offs ratio**. This measure is calculated by dividing the annual total gross dollars written off for residential accounts by the annual total dollars of residential billings. The measure offers an equitable basis for comparison of gross residential dollars written off to the annual total dollars of residential billings. Figures used in the tables below do not include CAP credits or arrearage forgiveness.

Gross Write-Offs Ratio – Electric Customers – 2021

Utility	Residential Gross Write-Offs Ratio	Confirmed Low-Income Gross Write-Offs Ratio
Duquesne	2.7%	5.5%
Met-Ed	1.8%	9.6%
PECO-Electric	1.5%	3.3%
Penelec	2.2%	8.9%
Penn Power	1.2%	6.9%
PPL	2.2%	8.3%
West Penn	1.6%	9.4%
Total/Industry Average	1.9%	7.6%

Gross Write-Offs Ratio – Natural Gas Customers – 2021

Utility	Residential Gross Write-Offs Ratio	Confirmed Low-Income Gross Write-Offs Ratio
Columbia	2.3%	11.1%
NFG	1.4%	7.3%
PECO-Gas	0.5%	2.5%
Peoples*	1.9%	7.0%
PGW	4.1%	6.3%
UGI Utilities – Gas*	3.1%	1.4%
Total/Industry Average*	2.4%	6.3%

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

Gross Write-Offs Ratio – Residential Electric Customers – 2019-2021

Utility	2019 Gross Write-Offs Ratio	2020 Gross Write-Offs Ratio	2021 Gross Write-Offs Ratio
Duquesne	2.6%	2.4%	2.7%
Met-Ed	2.4%	1.7%	1.8%
PECO-Electric	1.4%	0.8%	1.5%
Penelec	2.7%	2.0%	2.2%
Penn Power	1.9%	1.3%	1.2%
PPL	2.6%	1.6%	2.2%
West Penn	2.3%	1.6%	1.6%
Total/Industry Average	2.2%	1.5%	1.9%

Gross Write-Offs Ratio – Residential Natural Gas Customers – 2019-2021

Utility	2019 Gross Write-Offs Ratio	2020 Gross Write-Offs Ratio	2021 Gross Write-Offs Ratio
Columbia	2.1%	1.1%	2.3%
NFG	2.9%	3.1%	1.4%
PECO-Gas	0.5%	0.3%	0.5%
Peoples*	3.1%	2.5%	1.9%
Peoples-Equitable*	3.1%	n/a	n/a
PGW	6.1%	4.2%	4.1%
UGI Utilities – Gas*	n/a	2.2%	3.1%
UGI South**	3.9%	n/a	n/a
UGI North**	3.6%	n/a	n/a
Total/Industry Average*	3.2%	2.2%	2.4%

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

**UGI South and UGI North performed limited credit and collection activities in early 2019 due to system conversion issues.

Gross Write-Offs Ratio – Confirmed Low-Income Electric Customers – 2019-2021

Utility	2019 Gross Write-Offs Ratio	2020 Gross Write-Offs Ratio	2021 Gross Write-Offs Ratio
Duquesne	6.3%	6.6%	5.5%
Met-Ed	10.9%	8.7%	9.6%
PECO-Electric	4.5%	3.2%	3.3%
Penelec	9.9%	8.1%	8.9%
Penn Power	9.6%	7.5%	6.9%
PPL	10.0%	4.1%	8.3%
West Penn	12.2%	9.2%	9.4%
Total/Industry Average	9.3%	5.7%	7.6%

Gross Write-Offs Ratio – Confirmed Low-Income Natural Gas Customers – 2019-2021

Utility	2019 Gross Write-Offs Ratio	2020 Gross Write-Offs Ratio	2021 Gross Write-Offs Ratio
Columbia	5.6%	3.1%	11.1%
NFG	17.2%	15.4%	7.3%
PECO-Gas	2.9%	3.2%	2.5%
Peoples*	9.5%	9.0%	7.0%
Peoples-Equitable*	9.4%	n/a	n/a
PGW	21.8%	8.2%	6.3%
UGI Utilities – Gas*	n/a	1.1%	1.4%
UGI South**	15.5%	n/a	n/a
UGI North**	12.3%	n/a	n/a
Total/Industry Average*	14.0%	6.0%	6.3%

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

** UGI South and UGI North performed limited credit and collection activities in early 2019 due to system conversion issues.

Annual Collection Operating Expenses

Annual collection operating expenses include administrative expenses associated with termination activity, negotiating payment arrangements, budget counseling, investigation and resolution of informal and formal complaints associated with payment arrangements, securing and maintaining deposits, tracking delinquent accounts, collection agencies' expenses, litigation expenses other than Commission-related, dunning expenses and winter survey expenses. Dunning, in the business context, refers to the collections process, whereby a business communicates with customers who have fallen behind in paying their bills. CAP recipient collection expenses are excluded. Due, in part, to the Commission's COVID-19 pandemic termination moratorium and protections, public utilities reported less annual collection operating expenses in 2020.

The tables below include both the residential and confirmed low-income categories to allow for the presentation of the percent of annual collection operating expenses which are attributed to confirmed low-income. Confirmed low-income dollar amounts are based on public utility-specific allocation factors (percentages) of the total operating expenses. Some public utilities utilize allocation percentages to estimate confirmed low-income Collection Operating Expenses.

Annual Electric Collection Operating Expenses – 2021

Utility	Residential	Confirmed Low-Income	Percent of Collection Operating Expenses for Confirmed Low- Income Customers
Duquesne*	\$5,650,501	\$803,501	14.2%
Met-Ed	\$14,477,392	\$9,968,040	68.9%
PECO-Electric	\$17,076,690	\$1,726,928	10.1%
Penelec	\$14,575,137	\$10,562,404	72.5%
Penn Power	\$3,072,511	\$2,073,171	67.5%
PPL	\$10,676,233	\$5,658,403	53.0%
West Penn	\$12,841,965	\$8,909,207	69.4%
Total/Industry Average	\$78,370,429	\$39,701,654	50.7%

*Duquesne reports it does not differentiate between confirmed low-income and residential operating expenses. Therefore, Duquesne provided estimated confirmed low-income Operating Expenses.

Annual Natural Gas Collection Operating Expenses – 2021

Utility	Residential	Confirmed Low-Income	Percent of Collection Operating Expenses for Confirmed Low- Income Customers
Columbia	\$3,087,170	\$1,010,810	32.7%
NFG	\$715,813	\$202,386	28.3%
PECO-Gas	\$2,110,602	\$122,401	5.8%
Peoples*	\$5,424,383	\$867,901	16.0%
PGW	\$1,050,275	\$237,128	22.6%
UGI Utilities – Gas*	\$8,157,817	\$2,808,832	34.4%
Total/Industry Average*	\$20,546,060	\$5,249,458	25.5%

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

Annual Residential Electric Collection Operating Expenses – 2019-2021

Utility	2019	2020	2021
Duquesne	\$7,811,163	\$5,047,179	\$5,650,501
Met-Ed	\$17,588,515	\$12,916,942	\$14,477,392
PECO-Electric	\$15,077,883	\$11,371,263	\$17,076,690
Penelec	\$17,499,436	\$13,276,426	\$14,575,137
Penn Power	\$4,199,273	\$3,137,598	\$3,072,511
PPL	\$9,104,260	\$9,860,638	\$10,676,233
West Penn	\$18,310,785	\$12,947,688	\$12,841,965
Total/Industry Average	\$89,591,315	\$68,557,734	\$78,370,429

Annual Residential Natural Gas Collection Operating Expenses – 2019-2021

Utility	2019	2020	2021
Columbia	\$5,042,206	\$2,000,716	\$3,087,170
NFG	\$522,372	\$488,958	\$715,813
PECO-Gas	\$1,863,559	\$1,405,437	\$2,110,602
Peoples*	\$2,548,096	\$3,240,421	\$5,424,383
Peoples-Equitable*	\$1,720,406	n/a	n/a
PGW	\$2,665,563	\$957,865	\$1,050,275
UGI Utilities – Gas*	n/a	\$4,599,633	\$8,157,817
UGI South**	\$5,284,248	n/a	n/a
UGI North**	\$2,693,930	n/a	n/a
Total/Industry Average*	\$22,340,380	\$12,693,030	\$20,546,060

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

**UGI South and UGI North performed limited credit and collection activities in early 2019 due to system conversion issues.

Annual Confirmed Low-Income Electric Collection Operating Expenses – 2019-2021

Utility	2019	2020	2021
Duquesne*	n/a	n/a	\$803,501
Met-Ed	\$12,918,584	\$9,403,191	\$9,968,040
PECO-Electric	\$1,528,962	\$1,110,220	\$1,726,928
Penelec	\$13,681,322	\$10,200,878	\$10,562,404
Penn Power	\$3,150,075	\$2,316,253	\$2,073,171
PPL	\$4,825,258	\$5,226,138	\$5,658,403
West Penn	\$13,406,453	\$9,383,596	\$8,909,207
Total/Industry Average	\$49,510,654	\$37,640,276	\$39,701,654

*Duquesne reports it does not differentiate between confirmed low-income and residential operating expenses. The Industry Total and Average does not include Duquesne.

Annual Confirmed Low-Income Natural Gas Collection Operating Expenses – 2019-2021

Utility	2019	2020	2021
Columbia	\$2,446,978	\$616,043	\$1,010,810
NFG	\$191,054	\$189,875	\$202,386
PECO-Gas	\$100,014	\$78,357	\$122,401
Peoples*	\$662,505	\$602,718	\$867,901
Peoples-Equitable*	\$309,673	n/a	n/a
PGW	\$815,815	\$263,173	\$237,128
UGI Utilities – Gas*	n/a	\$2,212,408	\$2,808,832
UGI South**	\$2,377,912	n/a	n/a
UGI North**	\$1,373,904	n/a	n/a
Total/Industry Average*	\$8,277,855	\$3,962,574	\$5,249,458

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

**UGI South and UGI North performed limited credit and collection activities in early 2019 due to system conversion issues.

3. Universal Service Programs

Demographics

The USRR requires EDCs and NGDCs to report the demographics of universal service program recipients, including the number of household members under age 18 and over age 62, household size, income and source of income. A low-income customer is defined³² as a residential public utility customer whose household income is at or below 150% of FPIG. Appendix 3 shows poverty levels in relation to household size and income. The following tables present some of the demographic information for low-income customers who participated in the universal service programs during 2021.

Average Household Income and Size

For all 2021 participants in universal service programs, average annual household income for electric customers was \$17,796 and \$16,678 for natural gas customers. The average annual household income is an approximation based on an average of the average income reported for universal service programs by each public utility.

Participants in Universal Service Programs Average Household Income – Summary for All Electric Customers – 2019-2021

Program	2019	2020	2021
LIURP	\$17,947	\$18,204	\$14,211
САР	\$14,387	\$14,292	\$18,474
CARES	\$13,438	\$18,572	\$18,362
Hardship Fund	\$22,202	\$22,018	\$20,462
Total/Industry Average	\$17,766	\$18,221	\$17,796

Participants in Universal Service Programs Average Household Income – Summary for All Natural Gas Customers – 2019-2021

Program	2019*	2020*	2021
LIURP	\$17,292	\$18,281	\$18,207
САР	\$14,811	\$14,251	\$14,551
CARES	\$15,929	\$16,927	\$16,645
Hardship Fund	\$20,192	\$17,805	\$17,308
Total/Industry Average	\$16,955	\$16,816	\$16,678

*From 2017 through 2020, some natural gas utilies had been reporting monthly household income rather than annual household income. This impacted the average household income for each universal service program for those years. This table provides corrected average income information for 2019 and 2020.

³² 52 Pa. Code § 54.72 and § 62.2

Source of Income

The majority of electric and natural gas customers participating in universal service programs have incomes from employment or pension/retirement benefits. The Other category includes all other income types, such as self-employed, seasonal, dependent, alimony, child support, no income and missing data. Unemployment compensation increases among CAP and hardship fund recipients in 2020 and 2021 may be due to the financial impact of the COVID-19 pandemic.

Participants in Universal Service Programs Source of Household Income – Summary for All LIURP Electric Customers – 2019-2021

Source of Household Income	2019 LIURP	2020 LIURP	2021 LIURP
Employment	32.1%	38.8%	35.6%
Pension or Retirement	23.3%	17.5%	18.8%
Unemployment Compensation	17.9%	11.4%	10.1%
Disability	11.1%	15.7%	11.3%
Public Assistance	2.6%	2.0%	2.2%
Other	13.0%	14.4%	22.0%

Participants in Universal Service Programs Source of Household Income – Summary for All CAP Electric Customers – 2019-2021

Source of Household Income	2019 CAP	2020 CAP	2021 CAP
Employment	28.8%	27.1%	25.9%
Pension or Retirement	21.7%	21.5%	21.2%
Unemployment Compensation	2.1%	4.6%	6.1%
Disability	21.9%	21.5%	21.6%
Public Assistance	3.1%	2.7%	2.3%
Other	22.4%	22.6%	22.9%

Participants in Universal Service Programs

Source of Household Income – Summary for All Hardship Fund Electric Customers – 2019-2021

Source of Household Income	2019 Hardship Fund	2020 Hardship Fund	2021 Hardship Fund
Employment	46.8%	47.3%	45.4%
Pension or Retirement	10.9%	17.0%	16.7%
Unemployment Compensation	2.3%	9.7%	9.7%
Disability	15.4%	13.8%	14.6%
Public Assistance	2.6%	0.7%	0.6%
Other	22.1%	11.6%	13.0%

Participants in Universal Service Programs Source of Household Income – Summary for All LIURP Natural Gas Customers – 2019-2021

Source of Household Income	2019 LIURP	2020 LIURP	2021 LIURP
Employment	26.0%	27.6%	25.8%
Pension or Retirement	30.0%	29.2%	31.4%
Unemployment Compensation	7.4%	5.9%	6.7%
Disability	13.5%	14.3%	14.1%
Public Assistance	2.7%	3.2%	2.6%
Other	20.4%	19.8%	19.4%

Participants in Universal Service Programs

Source of Household Income – Summary for All CAP Natural Gas Customers – 2019-2021

Source of Household Income	2019 CAP	2020 CAP	2021 CAP
Employment	30.2%	27.6%	26.5%
Pension or Retirement	33.1%	32.6%	30.9%
Unemployment Compensation	2.1%	4.6%	6.2%
Disability	17.1%	17.7%	17.9%
Public Assistance	3.6%	3.4%	3.3%
Other	13.9%	14.0%	15.1%

Participants in Universal Service Programs Source of Household Income – Summary for All Hardship Fund Natural Gas Customers – 2019-2021

Source of Household Income	2019 Hardship Fund	2020 Hardship Fund	2021 Hardship Fund
Employment	43.2%	39.1%	38.2%
Pension or Retirement	19.2%	16.4%	14.4%
Unemployment Compensation	2.7%	5.6%	10.3%
Disability	16.6%	18.8%	19.0%
Public Assistance	3.6%	1.9%	1.4%
Other	14.7%	18.2%	17.0%

Universal Service Participant Income Compared to the Federal Poverty Income Guidelines

Demographic data from the USRR reporting shows that "working poor" households in Pennsylvania do not always have incomes that exceed 150% of FPIG. According to the U.S. Bureau of Labor Statistics, the definition of a "working poor" household begins with a wage-earner who works full time (35+ hrs/week) at a minimum-wage job. In

2021, minimum wage in Pennsylvania was \$7.25 per hour, the same as it has been since 2009.³³ Annual income for an individual wage earner who works at a full time (40hr/week) minimum-wage job is \$15,080, which equates to 117% of FPIG in 2021 and 110% FPIG in 2022. By comparison, the average electric CAP household (two persons) had an income of \$18,474 in 2021, which placed these households' incomes at approximately 106% of FPIG (for two persons) for 2021 and 101% for 2022. The average natural gas CAP household (two persons) had an income of \$14,551, which placed the household at approximately 84% of FPIG for 2021 and 79% for 2022. See Appendix 3.

Low-Income Usage Reduction Program (LIURP)

LIURP is a statewide, public utility-sponsored, residential usage-reduction program mandated by the PUC.³⁴ The primary goal of LIURP is to assist low-income residential customers to reduce energy bills through usage reduction (energy conservation) and, as a result, to make bills more affordable.

LIURP is targeted toward customers with annual incomes at or below 150% of FPIG. However, EDCs and NGDCs are permitted to spend up to 20% of their annual LIURP budgets on customers with incomes between 151% and 200% of FPIG. LIURP places priority on the highest energy users who offer the greatest opportunities for energy savings and bill reductions. When feasible, the program targets customers with payment problems (arrearages). The program is available to both homeowners and renters. LIURP services all housing types, including single family homes, mobile homes and multi-family residences.

LIURP funds are often included in public utility rates as part of the distribution cost passed on to all residential customers or as part of a separate Universal Service rider, which the utility is able to recover. Public utilities are required to develop a LIURP funding level based upon a needs assessment, which, in turn, is based on census and public utility data. LIURP funding levels, which can also be modified in rate case proceedings, are reviewed as part of the public utility's most recently filed universal service and energy conservation plans (USECP). The public utilities currently file USECPs approximately every five years,³⁵ which are subject to an approval process.

While the PUC has regulatory oversight responsibilities for LIURP, the public utilities administer the program and hire non-profit and/or for-profit contractors to install conservation measures in homes. The various program measures are agreed to in contracts between the vendors and the public utilities.

Program measures are considered appropriate for a household if the projected energy savings from the installation of those measures exceed their costs over a seven or 12-year period.³⁶ Examples of program measures include: air infiltration sealing using the blower door air sealing techniques, all types of insulation (such as attic and sidewall), heating system treatments and replacements, water heating tank and pipe wraps, water heater replacements, faucet aerators, light-emitting diode (LED) lighting, refrigerator replacement, incidental repairs (not home rehabilitation), health and safety measures (such as smoke and carbon monoxide detectors) and energy conservation education.

The factors impacting LIURP energy savings include: the level of pre-weatherization usage, occupant energy behavior, housing type and size, age of the dwelling, condition of the dwelling, contractor capabilities and end uses such as heating, cooling and water heating.

LIURP benefits include: energy savings, bill reduction, improved health, safety and comfort levels, arrearage reduction, reduced collection activity, improved bill payment behavior, reduced use of supplemental fuels and

³³ The Pennsylvania state minimum wage of \$7.25 per hour was enacted on Jul. 24, 2009. <u>https://www.dol.gov/agencies/whd/minimum-wage/state#pa</u>

³⁴ 52 Pa. Code, Chapter 58

³⁵ On Oct. 3, 2019, at Docket No. M-2019-3012601, the Commission approved a pilot USECP filing schedule that supersedes the existing filing schedule and extends the duration of USECPs from three (3) years to five (5) years.

³⁶ 52 Pa. Code § 58.11(a)

secondary heating devices, more affordable low-income housing, reduction in homelessness and less housing abandonment.

The USRR provisions require EDCs and NGDCs to report various LIURP data, including: annual program costs for the reporting year, number of family members under 18 years of age, number of family members over 62 years of age, family size, household income, source of income, participation levels for the reporting year, projected annual spending for the current year, projected annual participation levels for the current year and average job costs.

This report includes aggregate data on completed LIURP jobs provided by EDCs and NGDCs.

LIURP Spending

EDCs and NGDCs that are unable to spend projected LIURP funds during one program year may carry over the unspent funds to the next year. Projected spending numbers noted below are reported to the Commission annually, but are estimates based on LIURP budgets approved in USECPs, or modified in base rate proceedings.

Utility	2021 Projected Spending*	2021 Actual Spending	2022 Projected Spending*
Duquesne	\$2,409,000	\$2,267,480	\$2,841,000
Met-Ed	\$5,949,109	\$5,760,936	\$6,284,233
PECO-Electric	\$7,867,154	\$5,620,481	\$5,589,676
Penelec	\$8,014,841	\$6,046,027	\$8,816,414
Penn Power	\$4,460,856	\$3,122,296	\$4,539,320
PPL	\$16,198,862	\$12,567,945	\$13,630,917
West Penn	\$7,322,110	\$6,941,354	\$7,075,716
Total/Industry Average	\$52,221,932	\$42,326,519	\$48,777,276

LIURP Spending – Electric Utilities – 2021

*May include carryover of unspent funds from previous program year, special provisions and settlements from rate cases.

LIURP Spending – Natural Gas Utilities – 2021

Utility	2021 Projected Spending*	2021 Actual Spending	2022 Projected Spending*
Columbia	\$7,320,352	\$3,463,108	\$8,932,244
NFG	\$2,609,065	\$972,968	\$2,936,096
PECO-Gas	\$3,610,069	\$2,250,012	\$2,249,987
Peoples	\$3,898,383	\$2,307,012	\$4,341,372
PGW	\$9,207,801	\$9,188,284	\$7,988,818
UGI Utilities – Gas	\$5,697,504	\$2,623,961	\$3,714,350
Total/Industry Average	\$32,343,174	\$20,805,345	\$30,162,867

*May include carryover of unspent funds from previous program year, special provisions and settlements from rate cases.

LIURP production (jobs completed) levels are influenced by many factors including the size of the public utility's LIURP program budget, the heating saturation among the public utility's customer population, housing-stock characteristics such as the type, size and condition, contractor capability, contractor capacity, and to a lesser extent, customer demographics, customer behavior and issues obtaining landlord permission for customers who rent.

All LIURP natural gas jobs are classified as heating. For electric jobs, the determination of the job type depends on whether the customer heats primarily with electricity. If most of the dollars spent on the completed job are on heating-related program measures, then the job is classified as a heating job. If the customer does not heat with electricity but uses electricity for water heating, and most of the dollars spent on the completed job are on waterheating measures, then the job is classified as a water-heating job. If the customer does not use electricity for either heating or water heating, the completed job is automatically classified as a baseload job.

NOTE: Due to the COVID-19 pandemic, EDCs and NGDCs suspended LIURP spending and production for several months in 2020. The length of the suspension varied by public utility.

		2020 ual Product	tion	2021 Actual Production		2022 Projected Production			
Utility	Heating Jobs	Water Heating Jobs	Baseload Jobs	Heating Jobs	Water Heating Jobs	Baseload Jobs	Heating Jobs	Water Heating Jobs	Baseload Jobs
Duquesne	216	9	1,415	251	6	2,362	310	10	2,780
Met-Ed	444	392	274	555	450	267	622	494	389
PECO-Electric	373	0	2,610	499	0	1,542	744	0	2,880
Penelec	261	727	337	346	1,073	542	446	1,186	653
Penn Power	142	187	242	134	234	328	202	283	370
PPL	506	412	682	2,278	829	1,277	2,300	1,000	1,200
West Penn	305	462	229	346	608	249	287	479	204
Total/Industry Average	2,247	2,189	5,789	4,409	3,200	6,567	4,911	3,452	8,476

LIURP Electric Production – 2019-2021

LIURP Natural Gas Production – 2019-2021

Utility	2020 Actual Production Heating Jobs	2021 Actual Production Heating Jobs	2022 Projected Production Heating Jobs
Columbia	257	307	792
NFG	77	94	344
PECO-Gas	293	309	600
Peoples*	204	238	447
PGW	1,657	2,060	1,765
UGI Utilities – Gas*	247	378	420
Total/Industry Average*	2,735	3,091	4,663

LIURP Average Job Costs

Customer usage profiles are typically highest for heating jobs followed by water heating jobs and baseload jobs. Average job costs are based on the total number of completed jobs in the job-type category and the total costs associated with those jobs. Specifically, the average job cost is calculated by dividing the total dollars spent on a type of job by the number of jobs completed.

Utility	2019 Heating Jobs	2020 Heating Jobs	2021 Heating Jobs
Duquesne*	\$4,090	\$1,400	\$867
Met-Ed	\$4,206	\$4,224	\$4,301
PECO-Electric	\$2,121	\$3,739	\$3,974
Penelec	\$3,528	\$4,021	\$3,523
Penn Power	\$4,137	\$6,716	\$6,059
PPL	\$4,342	\$4,461	\$4,072
West Penn	\$4,779	\$5,095	\$6,058

LIURP Electric Average Heating Job Costs – 2019-2021

*Duquesne notes that heating jobs may include jobs completed for electric customers and/or multifamily building owners.

LIURP Electric Average Water Heating Job Costs – 2019-2021

Utility	2019 Water Heating Jobs	2020 Water Heating Jobs	2021 Water Heating Jobs
Duquesne	\$1,666	\$3,824	\$2,754
Met-Ed	\$2,713	\$2,747	\$3,155
PECO-Electric	\$0	\$0	\$0
Penelec	\$2,153	\$2,409	\$2,246
Penn Power	\$1,925	\$2,215	\$3,210
PPL	\$1,954	\$1,618	\$1,881
West Penn	\$3,029	\$4,021	\$4,447

LIURP Electric Average Baseload Job Costs - 2019-2021

Utility	2019 Baseload Jobs		
Duquesne*	\$561	\$869	\$861
Met-Ed	\$2,199	\$2,523	\$2,988
PECO-Electric	\$545	\$750	\$1,955
Penelec	\$1,563	\$1,990	\$1,894
Penn Power	\$1,442	\$1,823	\$2,358
PPL	\$1,143	\$1,036	\$1,120
West Penn	\$2,337	\$3,207	\$3,776

*Duquesne reports that heating jobs performed in multi-family buildings may include only baseload measures for some units, which decreases the annual average heating job cost.

Utility	2019 Heating Jobs	2020 Heating Jobs	2021 Heating Jobs
Columbia	\$8,138	\$7,207	\$6,216
NFG	\$5,741	\$5,624	\$5,779
PECO-Gas	\$2,303	\$3,037	\$7,256
Peoples*	\$8,216	\$8,174	\$7,978
Peoples-Equitable*	\$8,605	n/a	n/a
PGW	\$1,952	\$3,039	\$3,485
UGI Utilities – Gas*	n/a	\$6,440	\$6,739
UGI South	\$6,593	n/a	n/a
UGI North	\$5,746	n/a	n/a

LIURP Natural Gas Average Job Cost - 2019-2021

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

LIURP Energy Savings and Bill Reduction

LIURP energy savings are determined by calculating the difference in a customer's usage during the 12 months following the installation of the LIURP measures (post period), from the usage during the 12 preceding months (pre period). The energy savings reported are based on weather-normalized data and represent an average of the public utility results for each job category. LIURP reporting results for the program year always trail two years behind the USRR reporting year due to the process of evaluating post-installation usage for 12 months, with analysis performed in the following year.

The estimated annual bill reduction is calculated by multiplying the average number of kWhs or Mcfs saved during the post-treatment period by the average price per kWh or Mcf during that period. EDCs and NGDCs voluntarily report pricing information annually. The 2017-2019 program year estimated annual bill reductions presented below are based on the average of the public utility results from each category of LIURP jobs completed in the program year, evaluated in the following year (post period) and reported in the year after that. Example: 2019 program year was evaluated in 2020 (post period) and reported to the Commission in 2021.

A number of factors can affect energy savings and annual bill reduction estimates: unusually warm or cold weather during the LIURP program year (during the pre or post-period), condition of the housing stock, customer behavior and differences from year-to-year in the utilities' contractor performance and utility rates.

Job Type	2017 Energy Savings	2018 Energy Savings	2019 Energy Savings
Electric Heating	8.0%	8.1%	7.6%
Electric Water Heating	7.3%	6.6%	10.7%
Electric Baseload	5.8%	5.6%	7.3%
Gas Heating	16.3%	16.6%	15.2%

LIURP Energy Savings – 2017-2019 Program Years

LIURP Estimated Annual Bill Savings – 2017-2019 Program Years

Job Type	2017 Estimated Annual Bill Reduction	2018 Estimated Annual Bill Reduction	2019 Estimated Annual Bill Reduction	
Electric Heating	\$222	\$198	\$194	
Electric Water Heating	\$139	\$122	\$200	
Electric Baseload	\$92	\$84	\$114	
Gas Heating	\$324	\$304	\$249	

Customer Assistance Programs (CAPs)

The PUC monitors implementation of the Commission's statute, regulations and CAP Policy Statement³⁷ by EDCs serving more than 60,000 customers and NGDCs serving more than 100,000 customers. The USRR requires EDCs and NGDCs to report the number of customers enrolled in CAP. The Commission uses the number of participants enrolled in CAP at the end of the program year to quantify participation. Each qualifying EDC and NGDC submits a USECP for Commission approval and a third-party evaluation of its universal service programs. USECPs and Evaluations are posted on the Commission's website (Appendix 4 contains viewing instructions).

CAP Participation Rate

The **CAP participation rate** is defined as the number of participants enrolled as of Dec. 31, 2021, divided by the number of confirmed low-income customers served by the EDC or NGDC. The Commission expects EDCs and NGDCs to maintain open enrollment to meet the need in each public utility's service territory. The CAP participation rate would be much lower if the rate reflected estimated low-income customers rather than confirmed low-income customers, as estimated customer numbers based on census data are much higher and less accurate.

	20	19	202	2020		2021	
Utility	Participants Enrolled as of 12/31/19	CAP Participant Rate	Participants Enrolled as of 12/31/20	CAP Participant Rate	Participants Enrolled as of 12/31/21	CAP Participant Rate	
Duquesne	35,853	74.1%	33,638	70.6%	35,229	73.2%	
Met-Ed	13,043	17.7%	19,310	26.4%	21,280	36.7%	
PECO-Electric	111,124	79.6%	114,735	84.6%	121,408	86.1%	
Penelec	18,287	20.0%	25,345	28.1%	28,463	39.1%	
Penn Power	3,976	19.7%	5,546	27.9%	6,281	38.9%	
PPL	63,306	33.4%	65,862	34.0%	64,673	32.9%	
West Penn	15,692	21.2%	22,591	30.0%	24,792	39.3%	
Total/Industry Average	261,281	41.0%	287,027	45.2%	302,126	50.7%	

CAP Participation – Electric Utilities – 2019-2021

³⁷ 66 Pa. C.S. §§ 2802(10), 2804(9), 2203(7) and 2203(8). 52 Pa. Code §§ 54.71-54.78, 62.1-62.8 and 69.261–69.267.

CAP Participation – Natural Gas Utilities – 2019-2021

	20 1	19	2020		2021	
Utility	Participants Enrolled as of 12/31/19	CAP Participant Rate	Participants Enrolled as of 12/31/20	CAP Participant Rate	Participants Enrolled as of 12/31/21	CAP Participant Rate
Columbia	22,707	33.6%	23,542	34.6%	24,459	35.9%
NFG	7,392	22.9%	7,793	22.1%	7,201	25.7%
PECO-Gas	19,358	77.5%	20,188	77.0%	21,776	79.2%
Peoples*	15,969	23.6%	31,202	28.7%	32,421	29.9%
Peoples-Equitable*	12,214	29.4%	n/a	n/a	n/a	n/a
PGW	54,040	36.8%	55,497	41.5%	53,466	48.4%
UGI Utilities – Gas*	n/a	n/a	24,236	31.3%	22,493	28.7%
UGI South	11,265	28.8%	n/a	n/a	n/a	n/a
UGI North	7,613	30.5%	n/a	n/a	n/a	n/a
Total/Industry Average*	150,558	33.8%	162,458	36.1%	161,816	38.4%

**See above: Impact of Utility Mergers on Collections and Universal Service Data.

Monthly Average Electric CAP Participation – 2019-2021

Utility	2019	2020	2021
Duquesne	36,418	35,853	34,129
Met-Ed	13,993	16,186	20,441
PECO-Electric	112,157	113,536	118,393
Penelec	19,435	21,635	27,069
Penn Power	4,217	4,750	5,950
PPL	61,202	63,336	66,178
West Penn	17,232	19,090	23,853
Total/Industry Average	264,654	274,385	296,013

Monthly Average Natural Gas CAP Participation – 2019-2021

Utility	2019	2020	2021
Columbia	23,551	23,279	24,122
NFG	7,294	7,660	7,544
PECO-Gas	19,427	19,908	21,079
Peoples*	17,034	28,892	32,126
Peoples-Equitable*	12,928	n/a	n/a
PGW	53,722	54,646	59,139
UGI Utilities – Gas*	n/a	23,860	23,264
UGI South	8,422	n/a	n/a
UGI North	5,369	n/a	n/a
Total/Industry Average*	147,747	158,243	167,273

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

Monthly Average Electric CAP Participation by Poverty Level – 2019-2021

	2019			2020			2021		
Utility	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG
Duquesne	7,646	18,093	10,680	7,360	17,778	10,715	7,366	16,388	10,375
Met-Ed	3,186	6,224	4,584	4,460	6,884	4,842	6,524	8,249	5,668
PECO-Electric	25,109	55,465	31,582	26,561	55,091	31,884	29,857	56,202	32,334
Penelec	3,400	9,420	6,615	4,559	10,216	6,860	6,735	12,294	8,040
Penn Power	731	1,991	1,495	1,022	2,134	1,594	1,503	2,581	1,866
PPL	12,010	27,689	21,504	12,418	27,890	23,028	12,538	28,173	25,467
West Penn	3,488	7,964	5,779	4,596	8,590	5,904	6,681	10,268	6,905
Total/Industry Average	55,570	126,845	82,239	60,976	128,583	84,826	71,205	134,154	90,655

Monthly Average Natural Gas CAP Participation by Poverty Level – 2019-2021

	2019			2020			2021		
Utility	0%-50% FPIG	51%-100% FPIG	101%- 150% FPIG	0%-50% FPIG	51%-100% FPIG	101%- 150% FPIG	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG
Columbia	5,297	10,539	7,715	5,397	10,385	7,497	6,603	10,215	7,304
NFG	832	3,684	2,778	958	3,850	2,852	930	3,777	2,838
PECO-Gas	4,542	8,288	6,597	4,837	8,434	6,637	5,587	8,691	6,802
Peoples*	3,869	7,661	5,505	7,704	12,684	8,504	9,340	13,602	9,184
Peoples- Equitable*	3,569	5,859	3,501	n/a	n/a	n/a	n/a	n/a	n/a
PGW	12,936	35,651	5,135	11,879	29,735	13,031	14,123	31,093	13,923
UGI Utilities – Gas*	n/a	n/a	n/a	6,293	11,366	6,201	6,159	10,357	6,747
UGI South	2,493	4,004	1,925	n/a	n/a	n/a	n/a	n/a	n/a
UGI North	1,260	2,531	1,577	n/a	n/a	n/a	n/a	n/a	n/a
Total/Industry Average*	34,798	78,217	34,733	37,068	76,454	44,722	42,742	77,734	46,797

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

Monthly Average Percent Electric CAP Participation by Poverty Level – 2019-2021

	2019			2020			2021		
Utility	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG
Duquesne	21.0%	49.7%	29.3%	20.5%	49.6%	29.9%	21.6%	48.0%	30.4%
Met-Ed	22.8%	44.5%	32.8%	27.6%	42.5%	29.9%	31.9%	40.4%	27.7%
PECO-Electric	22.4%	49.5%	28.2%	23.4%	48.5%	28.1%	25.2%	47.5%	27.3%
Penelec	17.5%	48.5%	34.0%	21.1%	47.2%	31.7%	24.9%	45.4%	29.7%
Penn Power	17.3%	47.2%	35.5%	21.5%	44.9%	33.6%	25.3%	43.4%	31.4%
PPL	19.6%	45.2%	35.1%	17.0%	45.5%	37.5%	18.9%	42.6%	38.5%
West Penn	20.2%	46.2%	33.5%	24.1%	45.0%	30.9%	28.0%	43.0%	28.9%
Total/Industry Average	21.0%	47.9%	31.1%	21.7%	47.2%	31.1%	24.1%	45.3%	30.6%

Monthly Average Percent Natural Gas CAP Participation by Poverty Level – 2019-2021

	2019			2020			2021		
Utility	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG
Columbia	22.5%	44.7%	32.8%	23.2%	44.6%	32.2%	27.4%	42.3%	30.3%
NFG	11.4%	50.5%	38.1%	12.5%	50.3%	37.2%	12.3%	50.1%	37.6%
PECO-Gas	23.4%	42.7%	34.0%	24.3%	42.4%	33.3%	26.5%	41.2%	32.3%
Peoples*	22.7%	45.0%	32.3%	26.7%	43.9%	29.4%	29.1%	42.3%	28.6%
Peoples- Equitable*	27.6%	45.3%	27.1%	n/a	n/a	n/a	n/a	n/a	n/a
PGW	24.1%	66.4%	9.6%	21.7%	54.4%	23.8%	23.9%	52.6%	23.5%
UGI Utilities – Gas*	n/a	n/a	n/a	26.4%	47.6%	26.0%	26.5%	44.5%	29.0%
UGI South	29.6%	47.5%	22.9%	n/a	n/a	n/a	n/a	n/a	n/a
UGI North	23.5%	47.1%	29.4%	n/a	n/a	n/a	n/a	n/a	n/a
Total/Industry Average*	23.6%	52.9%	23.5%	23.4%	48.3%	28.3%	25.6%	46.5%	28.0%

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

CAP Default Rate

The **CAP default rate** is calculated by dividing the average monthly CAP participation at each poverty level, by the total annual number of defaults for each poverty level. CAP customers are considered non-compliant (in default) when they fail to meet program requirements. Actions resulting in CAP defaults include missing payments, making late payments, or failing to recertify. CAP customers who voluntarily leave the program are not counted in the default rate. EDCs and NGDCs may track CAP default occurences differently. Therefore, the default rates in the tables below are not statistically valid for comparison purposes.

NOTE: Most EDCs and NGDCs suspended recertification requirements for CAP customers from March 2020 into 2021 due to the COVID-19 pandemic.³⁸ This contributed to reduced CAP default rates in 2020 and 2021.

³⁸ Duquesne resumed its CAP recertification procedures and requirements on June 18, 2020.

Annual Electric CAP Default Rate by Poverty Level – 2019-2021

	2019			2020			2021		
Utility	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG
Duquesne	27.2%	16.9%	16.8%	28.8%	20.2%	18.0%	40.4%	21.9%	20.3%
Met-Ed	72.4%	46.1%	51.7%	5.3%	7.7%	12.3%	8.8%	10.6%	15.4%
PECO-Electric	30.8%	20.3%	26.9%	13.8%	8.7%	11.5%	12.6%	8.5%	11.9%
Penelec	73.4%	39.7%	45.5%	4.1%	3.9%	7.9%	10.0%	9.2%	12.7%
Penn Power	79.8%	44.6%	48.0%	5.2%	4.8%	8.3%	10.0%	8.6%	12.9%
PPL	21.7%	12.9%	12.0%	11.4%	9.0%	10.3%	24.6%	22.6%	23.0%
West Penn	82.5%	51.9%	57.1%	4.7%	6.0%	9.4%	10.3%	11.6%	16.6%
Total/Industry Average	55.4%	33.2%	36.9%	12.9%	9.7%	11.5%	16.7%	13.5%	16.6%

Annual Natural Gas CAP Default Rate by Poverty Level – 2019-2021

	2019			2020			2021		
Utility	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG
Columbia	19.1%	15.8%	18.5%	2.0%	2.2%	3.2%	4.9%	3.3%	3.5%
NFG	24.4%	24.4%	24.4%	2.2%	2.2%	2.3%	9.9%	9.8%	9.8%
PECO-Gas	28.0%	20.1%	25.4%	13.6%	9.6%	11.8%	12.0%	10.1%	11.6%
Peoples*	24.9%	16.1%	34.8%	8.6%	7.2%	18.3%	0.3%	0.3%	0.6%
Peoples- Equitable*	23.7%	17.5%	54.7%	n/a	n/a	n/a	n/a	n/a	n/a
PGW	32.8%	16.7%	52.1%	4.9%	3.6%	4.1%	13.6%	12.2%	6.9%
UGI Utilities – Gas*	n/a	n/a	n/a	17.8%	15.4%	23.4%	40.0%	35.7%	36.7%
UGI South	31.4%	28.1%	42.0%	n/a	n/a	n/a	n/a	n/a	n/a
UGI North	31.3%	29.6%	41.4%	n/a	n/a	n/a	n/a	n/a	n/a
Total/Industry Average*	27.0%	21.0%	36.7%	8.5%	6.3%	10.3%	12.9%	11.7%	10.3%

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

CAP Benefits – Bills & Credits

The USRR requires EDCs and NGDCs to report data on CAP benefits. EDCs and NGDCs report by month the number of participants enrolled in CAP. Because CAP enrollment fluctuates during the year, the Commission bases average CAP credits and arrearage forgiveness benefits on the average monthly number of CAP participants rather than the number of CAP participants enrolled at the end of the year.

The PUC has identified the three components of **CAP benefits** as the average CAP bill, average CAP credits and average arrearage forgiveness. The average **CAP bill** is the total billed (total of the expected monthly CAP payment)

divided by the total number of CAP bills rendered. The average **CAP credit** is the difference between the usage-based bill and the CAP bill, divided by the average number of monthly CAP participants. The average **arrearage forgiveness** is the total pre-program arrearages forgiven as a result of customers making agreed upon CAP payments divided by the average number of monthly CAP participants. The tables show average monthly CAP bills and CAP benefits.

Average CAP bills and CAP credits fluctuate due to several factors, including varying CAP payment plans based on FPIG income levels, type of usage (heating or non-heating), condition of housing stock and changes in usage related to customer behavior.

Utility	2019	2020	2021
Duquesne	\$53	\$53	\$57
Met-Ed	\$58	\$69	\$67
PECO-Electric	\$65	\$68	\$70
Penelec	\$52	\$58	\$56
Penn Power	\$61	\$57	\$57
PPL	\$86	\$85	\$86
West Penn	\$61	\$60	\$53
Total/Industry Average	\$67	\$69	\$69

Average Monthly Electric CAP Bill – 2019-2021

Average Monthly Natural Gas CAP Bill – 2019-2021

Utility	2019	2020	2021
Columbia	\$52	\$51	\$53
NFG	\$59	\$48	\$52
PECO-Gas	\$64	\$52	\$52
Peoples*	\$77	\$73	\$74
Peoples-Equitable*	\$75	n/a	n/a
PGW	\$115	\$78	\$59
UGI Utilities – Gas*	n/a	\$68	\$67
UGI South	\$67	n/a	n/a
UGI North	\$72	n/a	n/a
Total/Industry Average*	\$83	\$67	\$61

Average Annual Electric CAP Credits – 2019-2021

Utility	2019	2020	2021
Duquesne	\$624	\$625	\$798
Met-Ed	\$865	\$879	\$895
PECO-Electric	\$473	\$491	\$525
Penelec	\$795	\$803	\$806
Penn Power	\$855	\$841	\$878
PPL	\$925	\$883	\$905
West Penn	\$807	\$812	\$691
Total/Industry Average	\$671	\$675	\$713

Average Annual Natural Gas CAP Credits – 2019-2021

Utility	2019	2020	2021
Columbia	\$763	\$628	\$830
NFG	\$172	\$163	\$188
PECO-Gas	\$113	\$113	\$97
Peoples*	\$309	\$225	\$290
Peoples-Equitable*	\$357	n/a	n/a
PGW	\$713	\$634	\$870
UGI Utilities – Gas*	n/a	\$274	\$288
UGI South	\$375	n/a	n/a
UGI North	\$479	n/a	n/a
Total/Industry Average*	\$510	\$416	\$544

CAP Benefits – Arrearage Forgiveness

Amounts of pre-program arrearage forgiveness can differ depending on the length of time over which forgiveness occurs, the length of time a customer is enrolled in CAP and the amount of customer arrearages deferred at CAP enrollment.

Average Annual Electric Utilities Arrearage Forgiveness – 2019-2021

Utility	2019	2020	2021
Duquesne	\$188	\$109	\$227
Met-Ed	\$101	\$97	\$121
PECO-Electric	\$41	\$31	\$55
Penelec	\$75	\$72	\$91
Penn Power	\$80	\$77	\$102
PPL	\$355	\$295	\$344
West Penn	\$125	\$108	\$127
Total/Industry Average	\$146	\$115	\$154

Average Annual Natural Gas Utilities Arrearage Forgiveness – 2019-2021

Utility	2019	2020	2021
Columbia*	\$78	\$45	\$136
NFG	\$72	\$61	\$67
PECO-Gas	\$19	\$16	\$17
Peoples*	\$120	\$107	\$154
Peoples-Equitable*	\$116	n/a	n/a
PGW	\$235	\$189	\$230
UGI Utilities – Gas*	n/a	\$110	\$125
UGI South	\$123	n/a	n/a
UGI North	\$138	n/a	n/a
Total/Industry Average*	\$140	\$113	\$154

Percent of CAP Dollars Paid

The **percentage of CAP bills paid** by CAP customers is calculated by dividing the total annual CAP payments (\$) by the total annual CAP amount billed (\$). The higher the percent of CAP bills paid by the customer, the less the public utility may have to recover in uncollectables. CAP customer payments may include energy assistance grants (*e.g.*, LIHEAP, Hardship Fund, etc.).

Utility	2019	2020	2021
Duquesne	82.0%	72.4%	76.6%
Met-Ed	97.2%	79.7%	116.7%
PECO-Electric	93.0%	77.0%	85.3%
Penelec	95.9%	81.7%	118.6%
Penn Power	95.7%	83.1%	116.0%
PPL	117.2%	95.9%	91.6%
West Penn	93.1%	83.1%	120.0%
Total/Industry Average	93.1%	82.9%	93.0%

Percentage of CAP Dollars Paid by Electric CAP Customers – 2019-2021

Percentage of CAP Dollars Paid by Natural Gas CAP Customers – 2019-2021

Utility	2019	2020	2021
Columbia	77.0%	70.4%	76.8%
NFG	72.0%	65.2%	60.6%
PECO-Gas	93.0%	77.0%	88.0%
Peoples*	93.2%	84.1%	91.5%
Peoples-Equitable*	93.0%	n/a	n/a
PGW	56.0%	72.9%	50.3%
UGI Utilities – Gas*	n/a	88.5%	97.7%
UGI South	89.9%	n/a	n/a
UGI North	90.2%	n/a	n/a
Total/Industry Average*	77.0%	77.4%	75.1%

CAP Payment Rate

The **CAP payment rate** is calculated by dividing the total number of full monthly CAP payments by the total number of monthly CAP bills rendered. The CAP payment rate reflects overall program totals and is not a household average or broken out by poverty level.

Utility	2019	2020	2021
Duquesne	48.0%	47.3%	54.4%
Met-Ed	69.1%	54.5%	69.7%
PECO-Electric	61.7%	58.7%	68.4%
Penelec	74.3%	62.3%	75.9%
Penn Power	71.5%	63.6%	71.4%
PPL	60.5%	60.7%	55.3%
West Penn	66.8%	58.1%	78.5%
Total/Industry Average	66.8%	57.7%	65.2%

CAP Payment Rate Electric CAP Customers - 2019-2021

CAP Payment Rate Natural Gas CAP Customers - 2019-2021

Utility	2019	2020	2021
Columbia	57.0%	51.5%	52.5%
NFG	76.2%	72.1%	71.5%
PECO-Gas	59.6%	56.4%	70.2%
Peoples*	49.1%	47.4%	53.1%
Peoples-Equitable*	45.2%	n/a	n/a
PGW	57.3%	50.6%	58.2%
UGI Utilities – Gas*	n/a	87.8%	89.6%
UGI South	87.0%	n/a	n/a
UGI North	86.9%	n/a	n/a
Total/Industry Average*	57.0%	57.4%	62.8%

CAP Costs

The USRR requires EDCs and NGDCs to report data on the three components of **CAP costs**: CAP administration costs, CAP credits and arrearage forgiveness. Administrative costs include: contract and staffing, account monitoring, intake, outreach, consumer education and conservation training, recertification processing, computer programming, program evaluation and other fixed overhead costs. Account monitoring costs include collection expenses, as well as other operation and maintenance expenses. The tables below contain the percentage of CAP spending by program component.

Component costs are gross costs and do not reflect any potential savings to traditional collection expenses, cash-working-capital expenses and bad debt expenses that may result from enrolling low-income customers in CAP. Appendicies 5-7 show total universal service costs, universal service funding mechanisms and average annual CAP and universal service costs per ratepayer.

	2019	I	2020	I	2021		
Utility	Administrative Costs Spending		Administrative Costs	Percent of Total Spending	Administrative Costs	Percent of Total Spending	
Duquesne	\$1,825,426	5.8%	\$1,932,360	6.8%	\$1,837,474	5.0%	
Met-Ed	\$1,421,762	9.5%	\$1,484,494	8.6%	\$1,601,892	7.2%	
PECO-Electric	\$3,227,793	5.3%	\$2,671,866	4.3%	\$2,875,667	4.0%	
Penelec	\$1,902,787	10.1%	\$1,658,192	8.1%	\$1,913,851	7.3%	
Penn Power	\$476,846	10.8%	\$436,515	9.1%	\$495,198	7.8%	
PPL	\$3,672,841	4.5%	\$2,971,587	3.8%	\$2,889,621	3.4%	
West Penn	\$1,695,378	9.6%	\$1,633,675	8.5%	\$1,784,118	8.4%	
Total/Industry Average	\$14,222,833	6.2%	\$12,788,689	5.6%	\$13,397,821	5.0%	

Electric Total CAP Spending by CAP Component – CAP Administrative Costs – 2019-2021

Electric Total CAP Spending by CAP Component – CAP Credits – 2019-2021

	2019)	202	0	202	2021		
Utility	CAP Credit Costs	Total		Percent of Total Spending	CAP Credit Costs	Percent of Total Spending		
Duquesne	\$22,719,014	72.3%	\$22,405,031	79.4%	\$27,227,252	74.0%		
Met-Ed	\$12,099,093	81.0%	\$14,226,455	82.4%	\$18,291,791	81.8%		
PECO-Electric	\$53,072,268	87.1%	\$55,780,710	90.1%	\$62,209,810	86.9%		
Penelec	\$15,450,895	82.1%	\$17,373,847	84.4%	\$21,816,555	83.3%		
Penn Power	\$3,606,122	81.6%	\$3,997,054	83.3%	\$5,226,516	82.6%		
PPL	\$56,618,569	69.0%	\$55,915,901	72.1%	\$59,865,948	70.0%		
West Penn	st Penn \$13,898,315		\$15,505,565	80.8%	\$16,472,954	77.4%		
Total/Industry Average	\$177,464,276	77.1%	\$185,204,563	80.7%	\$211,110,826	78.2%		

Electric Total CAP Spending by CAP Component – CAP Arrearage Forgiveness – 2019-2021

	2019	9	202	0	2021		
Utility	Arrearage Forgiveness Costs	Percent of Total Spending	Arrearage Forgiveness Costs	Percent of Total Spending	Arrearage Forgiveness Costs	Percent of Total Spending	
Duquesne	\$6,864,370	21.9%	\$3,890,620	13.8%	\$7,737,458	21.0%	
Met-Ed	\$1,414,537	9.5%	\$1,564,295	9.1%	\$2,467,132	11.0%	
PECO-Electric	\$4,643,279	7.6%	\$3,484,467	5.6%	\$6,461,827	9.0%	
Penelec	\$1,459,446	7.8%	\$1,559,447	7.6%	\$2,461,977	9.4%	
Penn Power	\$338,527	7.7%	\$366,390	7.6%	\$605,637	9.6%	
PPL	\$21,756,042	26.5%	\$18,656,480	24.1%	\$22,775,341	26.6%	
West Penn	\$2,145,692	12.1%	\$2,054,539	10.7%	\$3,022,512	14.2%	
Total/Industry Average	\$38,621,893	16.8%	\$31,576,238	13.8%	\$45,531,884	16.9%	

Natural Gas Total CAP Spending by CAP Component – CAP Administrative Costs – 2019-2021

	2019		2020		2021	L
Utility	Administrative Costs	Percent of Total Spending	Administrative Costs	Percent of Total Spending	Administrative Costs	Percent of Total Spending
Columbia	\$724,643	3.5%	\$726,617	4.4%	\$751,262	3.1%
NFG	\$368,648	17.1%	\$270,288	13.6%	\$218,475	10.2%
PECO-Gas	\$569,610	18.2%	\$434,955	14.4%	\$479,278	16.6%
Peoples*	\$617,038	7.8%	\$1,124,679	10.5%	\$1,143,373	7.4%
Peoples-Equitable*	\$403,781	6.2%	n/a	n/a	n/a	n/a
PGW	\$2,769,649	5.2%	\$1,069,750	2.3%	\$982,999	1.5%
UGI Utilities – Gas*	n/a	n/a	\$544,049	5.6%	\$644,932	6.2%
UGI South	\$287,977	6.4%	n/a	n/a	n/a	n/a
UGI North	\$257,435	7.2%	n/a	n/a	n/a	n/a
Total/Industry Average*	\$5,998,781	5.9%	\$4,170,338	4.7%	\$4,220,319	3.5%

Natural Gas Total CAP Spending by CAP Component – CAP Credits – 2019-2021

	2019)	202	0	202	1
Utility	CAP Credit Costs	Percent of Total Spending	CAP Credit Costs	Percent of Total Spending	CAP Credit Costs	Percent of Total Spending
Columbia	\$17,970,920	87.5%	\$14,619,229	89.1%	\$20,023,299	83.2%
NFG	\$1,255,846	58.4%	\$1,252,107	63.0%	\$1,415,748	66.1%
PECO-Gas	\$2,192,857	70.2%	\$2,253,981	74.7%	\$2,037,867	70.7%
Peoples*	\$5,264,910	66.5%	\$6,500,626	60.7%	\$9,330,496	60.6%
Peoples-Equitable*	\$4,610,563	70.8%	n/a	n/a	n/a	n/a
PGW	\$38,304,636	71.3%	\$34,664,939	75.3%	\$51,479,499	77.9%
UGI Utilities – Gas*	n/a	n/a	\$6,548,372	67.3%	\$6,711,495	64.9%
UGI South	\$3,157,143	70.4%	n/a	n/a	n/a	n/a
UGI North	\$2,573,600	72.1%	n/a	n/a	n/a	n/a
Total/Industry Average*	\$75,330,475	73.9%	\$65,839,254	74.9%	\$90,998,404	75.3%

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

Natural Gas Total CAP Spending by CAP Component – CAP Arrearage Forgiveness – 2019-2021

	2019)	202	0	202	1
Utility	Arrearage Forgiveness Costs	Percent of Total Spending	Arrearage Forgiveness Costs	Percent of Total Spending	Arrearage Forgiveness Costs	Percent of Total Spending
Columbia	\$1,837,043	8.9%	\$1,054,724	6.4%	\$3,284,454	13.7%
NFG	\$526,283	24.5%	\$466,566	23.5%	\$508 <i>,</i> 385	23.7%
PECO-Gas	\$361,809	11.6%	\$327,838	10.9%	\$366,692	12.7%
Peoples*	\$2,037,907	25.7%	\$3,085,811	28.8%	\$4,934,034	32.0%
Peoples-Equitable*	\$1,502,255	23.1%	n/a	n/a	n/a	n/a
PGW	\$12,611,499	23.5%	\$10,315,590	22.4%	\$13,629,103	20.6%
UGI Utilities – Gas*	n/a	n/a	\$2,631,434	27.1%	\$2,979,130	28.8%
UGI South	\$1,036,361	23.1%	n/a	n/a	n/a	n/a
UGI North	\$739,948	20.7%	n/a	n/a	n/a	n/a
Total/Industry Average*	\$20,653,105	20.3%	\$17,881,963	20.3%	\$25,701,798	21.3%

CAP Costs Per CAP Customer

The average **CAP cost per CAP customer** is calculated by dividing the Total CAP Cost by the Average Total CAP Enrollment. This provides an estimate of the amount of program costs for each CAP participant.

Utility		Total CAP Costs	Average Program Costs per CAP Customer			
	2019 2020 2021		2019	2020	2021	
Duquesne	\$31,408,810	\$28,228,011	\$36,802,184	\$862	\$787	\$1,078
Met-Ed	\$14,935,392	\$17,275,244	\$22,360,815	\$1,067	\$1,067	\$1,094
PECO- Electric	\$60,943,340	\$61,937,043	\$71,547,304	\$543	\$546	\$604
Penelec	\$18,813,128	\$20,591,486	\$26,192,383	\$968	\$952	\$968
Penn Power	\$4,421,495	\$4,799,959	\$6,327,351	\$1,049	\$1,010	\$1,063
PPL	\$82,047,452	\$77,543,968	\$85,530,910	\$1,341	\$1,224	\$1,292
West Penn	\$17,739,385	\$19,193,779	\$21,279,584	\$1,029	\$1,005	\$892
Total/Industry Average	\$230,309,002	\$229,569,490	\$270,040,531	\$870	\$837	\$912

Electric CAP Costs - 2019-2021

Natural Gas CAP Costs - 2019-2021

Utility		Total CAP Costs		Average Program Costs per CAP Customer			
	2019 2020 2021		2019	2020	2021		
Columbia	\$20,532,606	\$16,400,570	\$24,059,015	\$872	\$705	\$997	
NFG	\$2,150,777	\$1,988,961	\$2,142,608	\$295	\$260	\$284	
PECO-Gas	\$3,124,276	\$3,016,774	\$2,883,837	\$161	\$152	\$137	
Peoples*	\$7,919,855	\$10,711,116	\$15,407,903	\$465	\$371	\$480	
Peoples-Equitable*	\$6,516,599	n/a	n/a	\$504	n/a	n/a	
PGW	\$53,685,784	\$46,050,279	\$66,091,601	\$999	\$843	\$1,118	
UGI Utilities – Gas*	n/a	\$9,723,855	\$10,335,557	n/a	\$408	\$444	
UGI South	\$4,481,481	n/a	n/a	\$532	n/a	n/a	
UGI North	\$3,570,983	n/a	n/a	\$665	n/a	n/a	
Total/Industry Average*	\$101,982,361	\$87,891,555	\$120,920,521	\$690	\$555	\$723	

CARES

The primary purpose of a CARES program is to provide a cost-effective service that helps payment troubled customers maximize their ability to pay EDC and NGDC bills and maintain safe and adequate public utility service. CARES staff maintains and utilizes a network of community organizations and government agencies that can provide services to eligible customers who are experiencing a temporary hardship. CARES services include account counseling and monitoring (case management) and referrals to services that provide additional resources or assistance, such as LIHEAP and hardship funds.

CARES-LIHEAP

The USRR requires EDCs and NGDCs to report data on their CARES programs. CARES benefits are defined in the USRR as the total number and dollar amount of all LIHEAP benefits applied to all low-income customer accounts. The tables show the number of households receiving only LIHEAP cash grants, but the "Total LIHEAP Grants" dollar amounts include both LIHEAP cash grants and crisis grants.³⁹ The total amount of LIHEAP dollars each EDC or NGDC receives depends primarily on the amount of the federal LIHEAP appropriation to the state and the number of each public utility's low-income customers who participate in LIHEAP.

Utility	Low-Income Households who Received LIHEAP Cash Grants			Low-Income Households who Received LIHEAP Crisis Grants			Total LIHEAP Grants for Low-Income Customers*		
	2019	2020	2021	2019	2020	2021	2019	2020	2021
Duquesne	8,253	6,984	5,628	3,696	3,179	1,873	\$3,425,759	\$3,031,673	\$3,079,935
Met-Ed	8,023	7,388	7,008	2,728	2,679	1,525	\$3,333,130	\$3,290,821	\$3,632,999
PECO-Electric	32,426	31,159	33,893	16,906	15,571	29,182	\$15,037,188	\$14,962,585	\$19,450,859
Penelec	10,620	9,885	9,968	4,545	4,250	2,590	\$5,102,771	\$4,881,020	\$5,577,973
Penn Power	2,554	2,328	2,346	1,247	1,228	653	\$1,303,623	\$1,275,578	\$1,343,963
PPL	19,902	21,935	42,115	2,609	7,128	4,862	\$6,435,563	\$8,383,363	\$13,812,910
West Penn	12,021	11,586	11,204	4,557	4,552	2,539	\$5,462,256	\$5,582,321	\$6,063,007
Total	93,799	91,265	112,162	36,288	38,587	43,224	\$40,100,290	\$41,407,361	\$52,961,646

Electric CARES-LIHEAP - 2019-2021

*Total LIHEAP grants include both LIHEAP cash and crisis grants. Typically, customers who receive crisis grants also receive cash grants.

³⁹ To qualify for a LIHEAP cash grant, a household must have income at or below 150% of the FPIG, be a Pennsylvania resident and have a heating responsibility. 55 Pa. Code § 601.31. To qualify for a LIHEAP crisis grant, the household must meet the previous qualifications and be experiencing an energy emergency (*e.g.*, public utility service is off or in threat of termination). 55 Pa. Code § 601.32. Most households that receive LIHEAP crisis grants also receive LIHEAP cash grants.

Utility	Low-Income Households who Received LIHEAP Cash Grants			who F	Low-Income Households who Received LIHEAP Crisis Grants			Total LIHEAP Grants for Low-Income Customers*		
	2019	2020	2021	2019	2020	2021	2019	2020	2021	
Columbia	17,537	16,496	15,461	2,408	4,222	2,318	\$5,371,907	\$5,738,416	\$5,161,194	
NFG	15,692	14,583	13,699	2,084	2,764	3,404	\$4,768,166	\$4,694,799	\$7,358,404	
PECO-Gas	5,722	5,072	5,518	2,984	2,535	4,750	\$2,653,622	\$2,435,769	\$3,166,419	
Peoples**	16,541	25,529	49,010	4,070	9,932	5,248	\$6,474,870	\$9,719,267	\$17,759,396	
Peoples- Equitable**	11,384	n/a	n/a	3,640	n/a	n/a	\$4,774,616	n/a	n/a	
PGW	51,953	41,055	53,431	8,300	21,784	12,478	\$18,712,635	\$22,356,499	\$40,503,514	
UGI Utilities – Gas**	n/a	23,144	21,459	n/a	668	2,965	n/a	\$8,565,518	\$10,596,278	
UGI South	10,271	n/a	n/a	1,801	n/a	n/a	\$3,289,554	n/a	n/a	
UGI North	9,555	n/a	n/a	1,433	n/a	n/a	\$3,217,454	n/a	n/a	
Total **	138,655	125,879	158,578	26,720	41,905	31,163	\$49,262,824	\$53,510,268	\$84,545,205	

Natural Gas CARES-LIHEAP - 2019-2021

*Total LIHEAP grants include both LIHEAP cash and crisis grants. Typically, customers who receive crisis grants also receive cash grants.

**See above: Impact of Utility Mergers on Collections and Universal Service Data.

The estimated LIHEAP participation rate is determined by dividing the number of LIHEAP cash grants by the number of confirmed low-income customers for each public utility. As LIHEAP participants may only assign their LIHEAP cash grant to one energy vendor, low-income customers with non-electric heating could assign the LIHEAP grant to either their heating supplier (*e.g.*, gas, oil) or their electric utility. Therefore, this participation rate may under-count the actual number of confirmed low-income customers that actually participated in LIHEAP for each utility.

Estimated Electric LIHEAP Participation Rate – 2019-2021

Utility	2019	2020	2021
Duquesne	17.1%	14.7%	11.7%
Met-Ed	10.9%	10.1%	12.1%
PECO-Electric	23.2%	23.0%	24.0%
Penelec	11.6%	11.0%	13.7%
Penn Power	12.6%	11.7%	14.5%
PPL	10.5%	11.3%	21.4%
West Penn	16.2%	15.4%	17.8%
Total/Industry Average	14.7%	14.4%	18.8%

Estimated Natural Gas LIHEAP Participation Rate - 2019-2021

Utility	2019	2020	2021
Columbia	25.9%	24.2%	22.7%
NFG	48.6%	41.4%	48.9%
PECO-Gas	22.9%	19.3%	20.1%
Peoples*	24.4%	23.5%	45.2%
Peoples-Equitable*	27.4%	n/a	n/a
PGW	35.3%	30.7%	48.4%
UGI Utilities – Gas*	n/a	29.8%	27.4%
UGI South	26.3%	n/a	n/a
UGI North	38.3%	n/a	n/a
Total/Industry Average*	31.1%	28.0%	37.7%

*See above: Impact of Utility Mergers on Collections and Universal Service Data.

CARES Costs, Direct Dollars and Net Benefits

The regulations define direct dollars as the total of all dollars applied to a CARES customer's public utility account, from all sources of energy assistance such as LIHEAP, hardship fund grants and local agencies' grants.⁴⁰ However, in our report, the column "Direct Dollars in Addition to LIHEAP for CARES Participants" shows the total dollar benefits not related to LIHEAP. These non-LIHEAP additional dollars come from hardship fund grants and other sources (*i.e.*, charities, community programs, etc).

Total CARES benefits, therefore, includes all LIHEAP cash and crisis grants, plus any additional non-LIHEAP direct dollars. Total CARES benefits reflect the effectiveness of the program in connecting customers with programs and resources that provide financial assistance.

CARES Administrative Costs are not included in the Total CARES benefits because these costs include staff salaries, LIHEAP outreach efforts and other expenses that may not be a direct benefit to CARES participants.

⁴⁰ 52 Pa. Code §§ 54.72 and 62.2.

Electric CARES Administrative Costs – 2019-2021

Utility	2019	2020	2021
Duquesne	\$135,000	\$135,000	\$135,000
Met-Ed	\$7,764	\$1,647	\$168*
PECO-Electric	\$909,307	\$1,060,017	\$839,178
Penelec	\$11,222	\$1,135	\$323*
Penn Power	\$2,696	\$1,030	\$180*
PPL	\$2,304	\$58,326	\$120,463
West Penn	\$11,520	\$2,674	\$168*
Total/Industry Average	\$1,079,813	\$1,259,829	\$1,095,480

*FirstEnergy reports the reduction in CARES Administrative Costs in 2021 is due primarily to not hosting in-person outreach events in 2021.

Natural Gas CARES Administrative Costs – 2019-2021

Utility	2019	2020	2021
Columbia	\$350,513	\$366,306	\$323,436
NFG	\$4,542	\$4,908	\$4,240
PECO-Gas	\$160,466	\$172,561	\$136,610
Peoples*	\$118,243	\$197,515	\$232,034
Peoples-Equitable*	\$85,397	n/a	n/a
PGW	\$541,419	\$550,853	\$579,379
UGI Utilities – Gas*	n/a	\$134,300	\$57,076
UGI South	\$80,372	n/a	n/a
UGI North	\$34,634	n/a	n/a
Total/Industry Average*	\$1,375,586	\$1,426,443	\$1,332,775

Electric CARES Benefits - 2021

Utility	LIHEAP for CARES Participants	Direct Dollars in Addition to LIHEAP for CARES Participants	Total CARES Benefits (Includes LIHEAP)
Duquesne	\$51,400	\$50,352	\$101,752
Met-Ed	\$325,764	\$133,226	\$458,990
PECO-Electric*	\$19,450,859	\$45,022	\$19,495,881
Penelec	\$433,809	\$87,558	\$521,367
Penn Power	\$120,537	\$47,292	\$167,829
PPL	\$1,483	\$38,300	\$39,783
West Penn	\$488,876	\$126,312	\$615,188
Total/Industry Average	\$20,872,727	\$528,063	\$21,400,790

*PECO counts all LIHEAP recipients and monies received as part of its CARES program. Other utilities count only the LIHEAP monies issued directly to CARES participants.

Electric CARES Benefits - 2020

Utility	LIHEAP for CARES Participants	Direct Dollars in Addition to LIHEAP for CARES Participants	Total CARES Benefits (Includes LIHEAP)
Duquesne	\$346,511	\$306,345	\$652,856
Met-Ed	\$410,800	\$70,440	\$481,240
PECO-Electric**	\$14,962,585	\$724,841	\$15,687,425
Penelec	\$479,913	\$50,738	\$530,651
Penn Power	\$142,838	\$16,699	\$159,537
PPL	\$3,473	\$87,312	\$90,785
West Penn	\$612,627	\$65,641	\$678,268
Total/Industry Average	\$16,958,747	\$1,322,015	\$18,280,762

*Duquesne reported a correction to Total CARES Benefits for 2019.

**PECO counts all LIHEAP recipients and monies received as part of its CARES program. Other utilities count only the LIHEAP monies issued directly to CARES participants.

Electric CARES Benefits – 2019

Utility	LIHEAP for CARES Participants	Direct Dollars in Addition to LIHEAP for CARES Participants	Total CARES Benefits (Includes LIHEAP)
Duquesne	\$397,436	\$352,355	\$749,791*
Met-Ed	\$2,387	\$500	\$2,887
PECO-Electric**	\$15,037,188	\$158,088	\$15,195,276
Penelec	\$957	\$0	\$957
Penn Power	\$0	\$500	\$500
PPL	\$200	\$48,850	\$49,050
West Penn	\$1,501	\$921	\$2,422
Total/Industry Average	\$15,439,669	\$594,187	\$16,033,856

*Duquesne reported a correction to Total CARES Benefits for 2018.

**PECO counts all LIHEAP recipients and monies received as part of its CARES program. Other utilities count only the LIHEAP monies issued directly to CARES participants.

Natural Gas CARES Benefits - 2021

Utility	LIHEAP for CARES Participants	Direct Dollars in Addition to LIHEAP for CARES Participants	Total CARES Benefits (Includes LIHEAP)
Columbia	\$1,890	\$28,609	\$30,499
NFG	\$4,580	\$986	\$5,566
PECO-Gas*	\$3,166,419	\$739	\$3,167,158
Peoples**	\$86,804	\$19,520	\$106,324
PGW	\$4,944,983	\$451,945	\$5,396,928
UGI Utilities – Gas**	\$316,958	\$664,068	\$981,026
Total/Industry Average	\$8,521,634	\$1,165,867	\$9,687,501

*PECO counts all LIHEAP recipients and monies received as part of its CARES program. Other utilities count only the LIHEAP monies issued directly to CARES participants.

Natural Gas CARES Benefits - 2020

Utility	LIHEAP for CARES Participants	Direct Dollars in Addition to LIHEAP for CARES Participants	Total CARES Benefits (Includes LIHEAP)
Columbia	\$2,877	\$37,544	\$40,421
NFG	\$4,275	\$0	\$4,275
PECO-Gas*	\$2,435,769	\$117,998	\$2,553,767
Peoples**	\$56,287	\$9,397	\$68,684
PGW	\$3,391,773	\$332,217	\$3,723,990
UGI Utilities – Gas**	\$12,818	\$12,000	\$24,818
Total/Industry Average	\$5,903,799	\$509,156	\$6,415,955

*PECO counts all LIHEAP recipients and monies received as part of its CARES program. Other utilities count only the LIHEAP monies issued directly to CARES participants.

Natural Gas CARES Benefits - 2019

Utility	LIHEAP for CARES Participants	Direct Dollars in Addition to LIHEAP for CARES Participants	Total CARES Benefits (Includes LIHEAP)
Columbia	\$6,554	\$51,582	\$58,136
NFG	\$6,844	\$0	\$6,844
PECO-Gas*	\$2,653,622	\$27,897	\$2,681,519
Peoples	\$50,624	\$10,088	\$60,712
Peoples-Equitable	\$22,116	\$7,498	\$29,614
PGW	\$2,426,289	\$1,668,704	\$4,094,993
UGI South	\$10,339	\$20,383	\$30,722
UGI North	\$21,364	\$18,736	\$40,100
Total/Industry Average	\$5,197,752	\$1,753,306	\$6,944,504

*PECO counts all LIHEAP recipients and monies received as part of its CARES program. Other utilities count only the LIHEAP monies issued directly to CARES participants.

Hardship Fund Programs

Public utility hardship funds provide cash assistance to residential customers who need help in paying their public utility or other energy bills, often after other resources (*e.g.,* LIHEAP) have been exhausted.

NOTE: Some EDC and NGDC hardship fund programs require that an eligible customer's service must be off or in termination status to qualify for a grant. Customers protected under the Commission's termination moratorium and protections in 2020 may not have met this criteria. Further, some EDCs and NGDCs reported that hardship fund agencies had limited hours or were closed during periods in 2020 due to COVID-19 restrictions. These factors may have contributed to a reduction in hardship fund grants issued by some public utilities in 2020.

Ratepayer and Shareholder Contributions

The USRR requires EDCs and NGDCs to report data on the amount of ratepayer and public utility contributions to hardship funds. Shareholders contribute a large portion of public utility contributions. The Commission considers

ratepayer contributions as volunatry contributions from public utility employees and ratepayers. The Commission defines public utility contributions as shareholder or public utility grants for program administration, outright grants to the funds and grants that match contributions of ratepayers. Special contributions consist of additional non-recurring monies added to the hardship fund for the program year, including from formal complaint settlements, overcharge settlements, off-system sales and special solicitations of business corporations.

NOTE: The contributions listed below may not include additional funds or grants made available by the administering agency for the public utility's hardship fund. This may result in the Total Benefits Disbursed exceeding the Total Contributions.

Utility	Voluntary Ratepayer Contributions	Residential Customers	Average Voluntary Ratepayer Contribution per Customer
Duquesne	\$217,478	543,300	\$0.40
Met-Ed	\$118,207	512,216	\$0.23
PECO-Electric	\$87,897	1,513,368	\$0.06
Penelec	\$74,929	501,816	\$0.15
Penn Power	\$36,610	148,138	\$0.25
PPL	\$542,166	1,251,196	\$0.43
West Penn	\$137,835	632,415	\$0.22
Total/Industry Average	\$1,215,122	5,102,449	\$0.24

Electric Hardship Fund Voluntary Ratepayer Contributions – 2020-2021

Natural Gas Hardship Fund Voluntary Ratepayer Contributions - 2020-2021

Utility	Voluntary Ratepayer Contributions	Residential Customers	Average Voluntary Ratepayer Contribution per Customer
Columbia	\$375,000	407,892	\$0.92
NFG	\$43,418	198,007	\$0.22
PECO-Gas	\$14,309	495,160	\$0.03
Peoples*	\$234,324	593,089	\$0.40
PGW	\$387	488,817	<\$0.01
UGI Utilities – Gas*	\$120,586	611,631	\$0.20
Total/Industry Average*	\$788,024	2,794,595	\$0.28

All Electric Hardship Fund Contributions – 2020-2021

Utility	Voluntary Ratepayer Contributions	Public Utility & Shareholder Contributions	Special Contributions	Total Contributions
Duquesne	\$217,478	\$328,830	\$0	\$546,308
Met-Ed	\$118,207	\$118,207	\$150,000	\$386,414
PECO-Electric	\$87,897	\$45,022	\$28,638	\$161,557
Penelec	\$74,929	\$74,929	\$0	\$224,787
Penn Power	\$36,610	\$36,385	\$0	\$72,995
PPL	\$542,166	\$736,109	\$0	\$1,278,275
West Penn	\$137,835	\$106,305	\$0	\$244,140
Total/Industry Average	\$1,215,122	\$1,445,787	\$178,638	\$2,914,476

All Natural Gas Hardship Fund Contributions – 2020-2021

Utility	Voluntary Ratepayer Contributions	Public Utility & Shareholder Contributions	Special Contributions	Total Contributions
Columbia	\$375,000	\$150,000	\$0	\$525,000
NFG	\$43,418	\$67,000	\$270	\$110,688
PECO-Gas	\$14,309	\$7,329	\$4,662	\$26,300
Peoples	\$234,324	\$1,317,840	\$0	\$1,552,164
PGW	\$387	\$184,435	\$0	\$184,822
UGI Utilities – Gas	\$120,586	\$584,500	\$0	\$705,086
Total/Industry Average	\$788,024	\$2,311,104	\$4,932	\$3,104,060

Hardship Fund Benefits

The USRR also requires EDCs and NGDCs to report data on hardship fund benefits. The Commission defines **hardship fund benefits**⁴¹ as, "the total number and dollar amount of cash benefits or bill credits." The cumulative total number and dollar amount of the grants disbursed for the program year are reported as of the end of the program year.

Utility	•	ayers g Grants	Average Grant		Total Benefits Disbursed	
	2019-20	2020-21	2019-20	2020-21	2019-20	2020-21
Duquesne	2,807	2,340	\$494	\$281	\$1,387,694	\$657,661
Met-Ed	953	759	\$354	\$363	\$337,447	\$275,781
PECO-Electric	27	147	\$467	\$613	\$12,621	\$90,044
Penelec	851	394	\$343	\$285	\$291,783	\$112,351
Penn Power	257	215	\$343	\$382	\$88,186	\$82,090
PPL	2,418	2,647	\$527	\$600	\$1,275,164	\$1,587,421
West Penn	1,159	620	\$345	\$390	\$399,749	\$241,728
Total/Industry Average	8,472	7,122	\$448	\$428	\$3,792,644	\$3,047,076

Electric Public Utility Hardship Fund Grant Benefits – 2019-2021

Natural Gas Public Utility Hardship Fund Grant Benefits – 2019-2021

Utility	•	RatepayersAverage GrantTotal Benefits DiskReceiving GrantsAverage GrantTotal Benefits Disk		Average Grant		ts Disbursed
	2019-20	2020-21	2019-20	2020-21	2019-20	2020-21
Columbia	1,196	3,282	\$408	\$378	\$487,716	\$1,239,146
NFG	71	59	\$211	\$278	\$15,001	\$16,402
PECO-Gas	3	24	\$685	\$611	\$2,055	\$14,658
Peoples	2,930	3,258	\$380	\$404	\$1,113,090	\$1,317,840
PGW	249	440	\$1,020	\$940	\$253,992	\$413,586
UGI Utilities – Gas	1,383	4,397	\$343	\$410	\$474,591	\$1,802,592
Total/Industry Average	5,832	11,460	\$402	\$419	\$2,346,445	\$4,804,224

⁴¹ 52 Pa. Code §§ 54.72 and 62.2

Total Universal Service Program Spending

Total annual Universal Service program spending is calculated by adding the total program costs for CAP, LIURP and CARES. Stakeholder and voluntary ratepayer contributions to hardship fund grants are not recovered in public utility base rates. Only hardship fund administrative costs are recoverable for most public utilities, so hardship fund program costs are not included in the Total Universal Service Program Spending tables below.⁴²

Utility	2019	2020	2021
Duquesne	\$31,543,810	\$29,929,490	\$39,204,664
Met-Ed	\$20,262,356	\$22,573,045	\$28,150,876
PECO-Electric	\$67,452,647	\$66,347,907	\$78,006,963
Penelec	\$25,873,561	\$25,204,860	\$32,261,967
Penn Power	\$7,266,661	\$7,146,568	\$9,460,957
PPL	\$92,122,145	\$81,403,432	\$98,219,318
West Penn	\$22,940,782	\$24,672,676	\$28,250,486
Total/Industry Average	\$267,461,962	\$257,277,978	\$313,555,231

Total Annual Electric Universal Service Program Spending – 2019-2021

Total Annual Natural Gas Universal Service Program Spending – 2019-2021

Utility	2019	2020	2021
Columbia	\$26,111,825	\$19,344,496	\$27,910,187
NFG	\$3,333,916	\$2,814,104	\$3,119,816
PECO-Gas	\$5,534,742	\$4,079,266	\$5,270,459
Peoples*	\$8,890,413	\$13,004,345	\$17,946,949
Peoples-Equitable*	\$7,369,738	n/a	n/a
PGW	\$62,195,671	\$53,651,466	\$76,119,413
UGI Utilities – Gas*	n/a	\$11,646,898	\$13,016,594
UGI South)	\$5,724,572	n/a	n/a
UGI North	\$4,583,565	n/a	n/a
Total/Industry Average*	\$123,744,442	\$104,540,575	\$143,383,418

⁴² Only PGW is permitted to recover all utility expenses related to its hardship fund program from its ratepayers. As a city-owned natural gas distribution utility, PGW receives no shareholder contributions for this program. Only voluntary contributions to PGW's hardship fund program are not recovered.

4. Small EDC and NGDC Universal Service Programs

The USRR has fewer data requirements for small EDCs and NGDCs.⁴³ EDCs with fewer than 60,000 residential customers and NGDCs with fewer than 100,000 residential customers do not file USECPs for Commission approval. Instead, the small EDCs and NGDCs are informally surveyed by BCS annually to determine the availability of programs provided to low-income customers as well as the expenses associated with these programs.

As of 4/30/2022, BCS surveyed the following EDCs and NGDCs:

EDCs	Residential Customers
Citizens' Electric	5,895
Pike County Power and Light	4,020
UGI Utilities Inc. – Electric	54,859
Valley Energy	6,263
Wellsboro Electric	5,131

NGDCs	Residential Customers
Peoples Gas LLC	58,000

As a result of the Electricity Generation Customer Choice and Competition Act and the Natural Gas Choice and Competition Act, five small EDCs and one small NGDC now have various universal service programs for their low-income customers.

Citizens' Electric (Citizens), Valley Energy (Valley) and Wellsboro Electric (Wellsboro) operate hardship funds through the Dollar Energy Fund.

Pike County Power & Light (Pike) operates its own CAP and a hardship fund program (Good Neighbor Fund Program).

Peoples Gas LLC (formerly Peoples TWP) offers CAP, LIURP, CARES and Hardship Fund programs. As of Dec. 31, 2021, the CAP enrollment was approximately 2,895 customers. Peoples Gas LLC's LIURP also completed 14 jobs in 2021.

UGI Utilities Inc. – Electric Division (UGI Electric) offers CAP, LIURP, CARES and Hardship Fund programs. As of Dec. 31, 2021, its CAP program enrollment was approximately 3,038 customers. UGI Electic's LIURP also completed 36 jobs in 2021.

In addition to the EDC and NGDC-sponsored programs, seasonal LIHEAP grants are available to all low-income households meeting the guidelines for LIHEAP eligibility.

^{43 52} Pa. Code §§ 54.77 and § 62.7

5. Appendices

Appendix 1 – When is an Account Considered to be Overdue

As mentioned previously in the sections dealing with "Debt", two factors affect the uniformity of the data reported regarding the number of overdue accounts and the dollars in debt associated with those accounts. First, EDCs and NGDCs use different methods for determining when an account is overdue. Second, EDCs and NGDCs consider either the due date of the bill or the transmittal date of the bill to be day zero. The transmittal date is 20 days before the due date. For USRR comparative purposes, EDCs and NGDCs are requested to consider the due date as day zero and to report debt that is at least 30 days overdue. Appendix 1 shows the different methods EDCs and NGDCs use to determine overdue accounts and how they compare to the preferred method (30 days overdue).

Utility	When is Day Zero (0)	When is Day Zero (0) How Many Days Overdue	
Duquesne	Bill Due Date	30 Days	0 Days
Met-Ed	Bill Due Date	30 Days	0 Days
PECO-Electric	Bill Transmittal Date	30 Days	20 Days Sooner
Penelec	Bill Due Date	30 Days	0 Days
Penn Power	Bill Due Date	30 Days	0 Days
PPL	Bill Transmittal Date	30 Days	20 Days Sooner
West Penn	Bill Due Date	30 Days	0 Days
Columbia	Bill Due Date	30 Days	0 Days
NFG	Bill Rendition Date*	60 Days	9 Days Later
PECO-Gas	Bill Transmittal Date	30 Days	20 Days Sooner
Peoples	Bill Due Date	30 Days	0 Days
PGW	Bill Transmittal Date	30 Days	20 Days Sooner
UGI Utilities – Gas	Bill Due Date	30 Days	0 Days

*Bill Rendition Date is one day prior to the Bill Transmittal Date.

Appendix 2 – When Does an Account Move from Active to Inactive Status

The second factor affecting the arrearage data uniformity is when a public utility moves a terminated or discontinued account from active status (included in the reporting) to inactive status (excluded from the reporting). Moving an account to inactive status is one of the last steps in the collections cycle. Appendix 2 shows the methods EDCs and NGDCs use to determine when an account is removed from active status after termination of service or discontinuance of service.

Utility	After an Account is Terminated	After an Account is Discontinued	
Duquesne	7 Days after Termination Date	3 to 5 Days after Discontinuance	
Met-Ed	10 Days after Termination Date	Same Day as Discontinuance	
PECO-Electric	30 to 32 Days after Termination Date	Same Day as Discontinuance	
Penelec	10 Days after Termination Date	Same Day as Discontinuance	
Penn Power	10 Days after Termination Date	Same Day as Discontinuance	
PPL	15 Days after Termination Date	Bill Transmittal Date	
West Penn	10 Days after Termination Date	Same Day as Discontinuance	
Columbia	5 to 7 Days after Termination Date	Same Day as Discontinuance	
NFG	Same Day as Termination Date	Same Day as Discontinuance	
PECO-Gas	30 to 32 Days after Termination Date	Same Day as Discontinuance	
Peoples*	10 Days after Termination Date	10 Days after Discontinuance	
PGW	0 to 30 Days after Termination Date	0 to 1 Day after Final Bill Transmittal Date	
UGI Utilities – Gas**	Same Day as Termination Date	Same Day as Discontinuance	

*The former Peoples Equitable utility maintained the same inactive account status timelines for terminated and discontinued accounts.

**The former UGI South and UGI North utilites maintained the same inactive account status timelines for terminated and discontinued accounts.

Appendix 3 – 2021 and 2022 Federal Poverty Guidelines

2021 Annual Federal Poverty Income Guidelines*					
Size of Household	0%-50% of Poverty	51%-100% of Poverty	101%-150% of Poverty	151%-200% of Poverty	
1	\$6,440	\$12,880	\$19,320	\$25,760	
2	\$8,710	\$17,420	\$26,130	\$34,840	
3	\$10,980	\$21,960	\$32,940	\$43,920	
4	\$13,250	\$26,500	\$39,750	\$53,000	
5	\$15,520	\$31,040	\$46,560	\$62,080	
6	\$17,790	\$35,580	\$53,370	\$71,160	
7	\$20,060	\$40,120	\$60,180	\$80,240	
8	\$22,330	\$44,660	\$66,990	\$89,320	
For each additional person, add	\$2,270	\$4,540	\$6,810	\$9,080	

 $\ensuremath{^*}$ Income reflects upper limit of the poverty guideline for each column.

Effective: Jan. 13, 2021. SOURCE: Federal Register, Vol. 86, Feb. 1, 2021, pp. 7732-7734.

2022 Annual Federal Poverty Income Guidelines*						
Size of Household	0%-50% of Poverty	51%-100% of Poverty	101%-150% of Poverty	151%-200% of Poverty		
1	\$6,795	\$13,590	\$20,385	\$27,180		
2	\$9,155	\$18,310	\$27,465	\$36,620		
3	\$11,515	\$23,030	\$34,545	\$46,060		
4	\$13,875	\$27,750	\$41,625	\$55,500		
5	\$16,235	\$32,470	\$48,705	\$64,940		
6	\$18,595	\$37,190	\$55,785	\$74,380		
7	\$20,955	\$41,910	\$62,865	\$83,820		
8	\$23,315	\$46,630	\$69,945	\$93,260		
For each additional person, add	\$2,360	\$4,720	\$7,080	\$9,440		

* Income reflects upper limit of the poverty guideline for each column.

Effective: Jan. 12, 2022. SOURCE: Federal Register, Vol. 87, Jan. 21, 2022, pp. 3315-3316.

To Access Universal Service Programs & Collections Performance Reports:

- Go to the PUC website at: <u>www.puc.pa.gov</u>.
- On the PUC's website, locate and click on the "Filings & Resources" tab on the headings bar.
- In the column of options on the left side of the page, locate and click on "<u>Reports.</u>"
- In the column of options on the left side of the page, locate and click on "Universal Service Reports."
- Choose the desired year of the Universal Service Programs & Collections Performance Report and click to access the report.

To Access Universal Service Plans and Evaluations:

- Go to the PUC website at: <u>www.puc.pa.gov</u>.
- On the PUC's website, hover over the Electricity dropdown menu and click on the "<u>Universal Service</u>" option.
- Under the header "Universal Service Plans & Evaluations" you will find the most current Universal Service Plan and Evaluation for each major EDC and NGDC.

To Access Utility Assistance Programs and Energy Assistance Resources:

- Go to the PUC website at: <u>www.puc.pa.gov</u>.
- On the PUC's website, locate and click on the "<u>About</u>" tab on the headings bar.
- In the column of options on the left side of the page labeled "About the PUC," locate and click "<u>Consumer</u> <u>Education</u>."
- Locate the "Utility Assistance Programs" tile and click "Find Support."

Appendix 5 – Universal Service Programs 2021 Cost Recovery Mechanisms

Riders and USEC/USP Surcharges for CAP costs are recovery mechanisms, which recover revenue outside of base rates. Universal Service riders/surcharges are adjusted quarterly or annually. This list is provided to show general recovery mechanisms, which may not apply to all Universal Service programs and may not reflect actual costs per ratepayer.

Utility	CAP Cost Recovery Mechanism	CAP & Universal Service Spending Assessed on Residential Ratepayers				
Duquesne	USC Rider & Base Rates	100%				
Met-Ed	USC Rider-Annual	100%				
PECO-Electric	Univ. Service Fund Charge & Base Rates	100%				
Penelec	USC Rider-Annual	100%				
Penn Power	USC Rider-Annual	100%				
PPL	US Rider-Annual	100%				
West Penn	USC Rider & Base Rates	100%				
Columbia	USP Rider	100%				
NFG	Rider F	100%				
PECO-Gas	Univ. Service Fund Charge & Base Rates	100%				
Peoples	USC Rider F	100%				
PGW*	USEC Surcharge	72.6%				
UGI Utilities – Gas	USP Rider F	100%				

* PGW's 2021 CAP, LIURP and CARES program costs were recovered from ratepayers in the following manner: residential (72.6%), commercial (22.31%), industrial (1.78%), municipal service (2.23%) and Philadelphia Housing Authority (PHA) (1.06%).

Appendix 6 – Universal Service Programs Annual CAP Spending Levels

Utility	2021 Annual CAP Spending	2021 Average Number of Ratepayers Paying CAP Costs	Estimated Annual CAP Spending per Ratepayer – 2019-2021		
			2019	2020	2021
Duquesne ¹	\$36,802,184	508,071	\$62.55	\$55.61	\$72.44
Met-Ed	\$22,360,815	512,216	\$29.59	\$33.96	\$43.66
PECO-Electric	\$71,547,304	1,513,368	\$40.93	\$41.22	\$47.28
Penelec	\$26,192,383	501,816	\$37.56	\$41.05	\$52.20
Penn Power	\$6,327,351	148,138	\$30.28	\$32.65	\$42.71
PPL	\$85,530,910	1,251,196	\$66.50	\$62.36	\$68.36
West Penn	\$21,279,584	632,415	\$28.27	\$30.46	\$33.65
Total/Industry Average ¹	\$270,040,531	5,067,220	\$46.03	\$45.54	\$53.29
Columbia ¹	\$24,059,015	383,433	\$54.54	\$42.92	\$62.75
NFG ¹	\$2,142,608	190,806	\$11.35	\$10.46	\$11.23
PECO-Gas	\$2,883,837	495,160	\$6.45	\$6.16	\$5.82
Peoples ^{1,3}	\$15,407,903	560,668	\$24.86	\$19.10	\$27.48
Peoples-Equitable ^{1,3}	n/a	n/a	\$27.75	n/a	n/a
PGW	\$47,982,502 ²	488,817	\$80.81	\$69.79	\$98.16
UGI Utilities – Gas ^{1,4}	\$10,335,557	589,138	n/a	\$16.76	\$17.54
UGI South ^{1,3}	n/a	n/a	\$12.49	n/a	n/a
UGI North ^{1,3}	n/a	n/a	\$23.55	n/a	n/a
Total/Industry Average ^{1,2,3}	\$120,920,521	2,708,021	\$33.57	\$32.67	\$44.65

¹ Public utilities who recover CAP costs from non-CAP ratepayers rather than all residential ratepayers. For those public utilities, the Average Number of Ratepayers reflects non-CAP ratepayers only.

² PGW's 2021 CAP spending includes only the amount recovered from residential customers, which was 72.6% of PGW's \$66,091,601 2021 total CAP costs.

Appendix 7 – Universal Service Programs Total Annual Spending Levels

Utility	2021 Annual Total Universal Service Spending ¹	2021 Average Number of Ratepayers Paying Universal Service Costs	Estimated Annual Universal Service Spending per Ratepayer – 2019-2021		
			2019	2020	2021
Duquesne ²	\$39,204,664	508,071	\$62.82	\$58.97	\$77.16
Met-Ed	\$28,150,876	512,216	\$40.15	\$44.37	\$54.96
PECO-Electric	\$78,006,963	1,513,368	\$45.31	\$44.16	\$51.55
Penelec	\$32,261,967	501,816	\$51.66	\$50.25	\$64.29
Penn Power	\$9,460,957	148,138	\$49.77	\$48.61	\$63.87
PPL	\$98,219,318	1,251,196	\$74.66	\$65.46	\$78.50
West Penn	\$28,250,486	632,415	\$36.56	\$39.16	\$44.67
Total/Industry Average ¹	\$313,555,231	5,067,220	\$53.45	\$51.04	\$61.88
Columbia ²	\$27,910,187	383,433	\$69.36	\$50.63	\$72.79
NFG ²	\$3,119,816	190,806	\$17.59	\$14.80	\$16.35
PECO-Gas	\$5,270,459	495,160	\$11.42	\$8.32	\$10.64
Peoples ^{2,4}	\$17,946,949	560,668	\$27.91	\$23.19	\$32.01
Peoples-Equitable	n/a	n/a	\$31.38	n/a	n/a
PGW	\$55,262,694 ³	488,817	\$93.61	\$81.31	\$113.05
UGI Utilities – Gas ^{2,4}	\$13,016,594	589,138	n/a	\$20.08	\$22.09
UGI South	n/a	n/a	\$15.96	n/a	n/a
UGI North	n/a	n/a	\$30.22	n/a	n/a
Total/Industry Average ^{1,2,4}	\$143,383,418	2,708,021	\$40.93	\$38.85	\$52.95

¹ Universal Service costs include CAP, LIURP and CARES.

² Utilities who recover Total Universal Service costs from non-CAP ratepayers rather than all residential ratepayers. For those public utilities, the Average Number of Ratepayers reflects non-CAP ratepayers only.

³ PGW's 2021 CAP spending includes only the amount recovered from residential customers, which was 72.6% of PGW's \$66,091,601 2021 total CAP costs.

⁴ See above: <u>Impact of Utility Mergers on Collections and Universal Service Data</u>.



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

