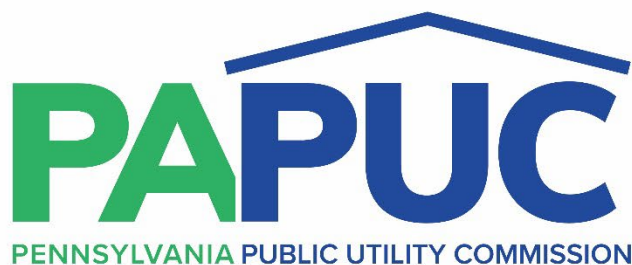


Universal Service Programs & Collections Performance

2022 REPORT



**BUREAU OF
CONSUMER SERVICES**



Universal Service Programs & Collections Performance 2022

September 2023

Published by:

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

**Bureau of Consumer Services
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Table of Contents

Executive Summary	1
1. Introduction	2
Treatment of Confirmed Low-Income Data Among the Collections Performance Data	2
Universal Service Programs.....	3
LIURP Regulations Review	3
CAP Policy Statement.....	4
Treatment of PECO Data	4
COVID-19 Pandemic and Utility Termination Moratorium.....	4
Impact of Increased Supply Rates in 2022.....	5
New for 2022	5
2. Collection Performance	7
Number of Residential and Confirmed Low-Income Customers	7
Payment Troubled Customers	11
Number of Payment Arrangements	13
Termination of Service.....	15
Reconnection of Service.....	17
Number of Customers in Debt.....	19
Residential Customer Dollars in Debt	23
Percent of Total Dollars Owed – On an Arrangement Versus Not on an Arrangement.....	26
Average Arrearage	29
Accounts Exceeding \$10,000 in Arrearages.....	32
Revenues (Billings)	38
Percent of Revenues (Billings) in Debt.....	39
Gross Residential Write-Offs in Dollars	41
Gross Write-Offs Ratio.....	44
Annual Collection Operating Expenses.....	46
3. Universal Service Programs.....	49
Demographics	49
Average Household Income and Size	49
Source of Income.....	50
Universal Service Participant Income Compared to the Federal Poverty Income Guidelines.....	52
Low-Income Usage Reduction Program (LIURP).....	52
LIURP Spending.....	53
LIURP Production.....	54
LIURP Average Job Costs	55
LIURP Energy Savings and Bill Reduction	57

Customer Assistance Programs (CAPs).....	58
CAP Participation Rate.....	58
CAP Default Rate.....	62
CAP Benefits – Bills & Credits.....	63
CAP Benefits – Arrearage Forgiveness.....	65
Percent of CAP Dollars Paid	66
CAP Payment Rate.....	67
CAP Costs.....	68
CAP Costs Per CAP Customer	70
CARES.....	71
CARES-LIHEAP	71
CARES Costs, Direct Dollars and Net Benefits.....	74
Hardship Fund Programs.....	77
Ratepayer and Shareholder Contributions	77
Hardship Fund Benefits	79
Total Universal Service Program Spending.....	80
4. Small EDC and NGDC Universal Service Programs	82
5. Appendices	83
Appendix 1 – When is an Account Considered to be Overdue.....	83
Appendix 2 – When Does an Account Move from Active to Inactive Status	84
Appendix 3 – 2022 and 2023 Federal Poverty Guidelines.....	85
Appendix 4 – Instructions to Access Universal Service Reports, Plans and Evaluations on PUC Website.....	86
Appendix 5 – Universal Service Programs 2022 Cost Recovery Mechanisms	87
Appendix 6 – Universal Service Programs Annual CAP Spending Levels	88
Appendix 7 – Universal Service Programs Total Annual Spending Levels	89

Executive Summary

The Pennsylvania Public Utility Commission's (PUC's) Annual Report on 2022 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 2022 calendar year.

The information provided in this report includes performance data related to collections and universal service activity submitted to the PUC by the EDCs and NGDCs. The Collections data consists of metrics related to utility debt and service termination activity for all residential customers and confirmed low-income residential customers. These Collections metrics include the number of payment-troubled customers, the number of terminations/reconnections, the number of customers in debt, the number of accounts with balances over \$10,000, and the amount of customer debt written off by the public utility (*i.e.*, gross write-offs). The universal service data consists of metrics related to the impact of four universal service and energy conservation programs in helping low-income customers reduce utility usage, bills and debt. These universal service metrics include the number of customers served, the types and amounts of benefits provided, and the costs of each universal service and energy conservation program.

Both EDCs and NGDCs reported that the loss of protections provided during the COVID-19 pandemic impacted some of their Collections metrics for 2022. Compared to 2021, EDCs and NGDCs report increases in the number of customers who have had a service termination or a broken payment arrangement. EDCs and NGDCs also reported writing off more of the arrearages which accumulated during the COVID-19 pandemic. Additionally, with the expiration of extended payment arrangement terms, the number of payment arrangements decreased for both residential and confirmed low-income customers. This reduction is also consistent with the reported decrease in customer debt on payment arrangements, which in turn may be related to the increase in service terminations.

Universal Services metrics also continue to reflect the impact of additional assistance monies made available via the *American Rescue Plan Act of 2021* to address debt accrued during the COVID-19 pandemic, such as increased funding for the Low Income Home Energy Assistance Program (LIHEAP). These monies significantly increased the amount of LIHEAP Cash and Crisis grants available to low-income customers during the 2021-22 LIHEAP season. As a result, LIHEAP participation and grant amounts received by confirmed low-income customers increased by large margins compared to 2021.

Some NGDCs report the temporary increase in LIHEAP and other energy assistance funds, as well as lower costs for natural gas compared to electric, contributed to a 7% reduction in NGDC CAP enrollments in 2022; while CAP enrollments for EDCs increased by 4%.

Finally, several factors may have contributed to increased universal service spending in 2022; including increases in both electric and natural gas supply rates, increased costs for weatherization labor and materials, and reduced income-based payments introduced for some CAPs. Spending for CAPs increased by 27% for EDCs and by 25% for NGDCs; while spending on all universal service and energy conservation programs increased by 24% for both EDCs and NGDCs.

1. Introduction

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 PUC 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 PUC 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 PUC 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 PUC in monitoring the progress of the EDCs and NGDCs in providing universal services 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 data-cleaning 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.

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 establishing a payment arrangement. We have included collection data about confirmed low-income customers for only a select number of collections

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)

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

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 PUC 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 PUC approved the merger of the UGI Utilities, Inc.'s 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.

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.

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.**

Most public utilities reported an increase in the number of customers who were confirmed low-income for 2022. Met-Ed, NFG, Penelec, Penn Power and West Penn reported that they began removing the “confirmed low-income” status from accounts if customers had not verified their household income within 24 months. PGW previously reported that the number of its confirmed low-income accounts had been declining, consistent with the decrease in the number of estimated low-income households in its service territory. However, PGW was among the public utilities that reported an increase in confirmed low-income customers for 2022.

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 PUC 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. Public utilities report on four mandatory universal service programs, including:

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.

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 PUC 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. By Order entered May 18, 2023, at this Docket, the PUC issued a Notice of Proposed Rulemaking

¹² Electricity Generation Customer Choice and Competition Act, 66 Pa. C.S. § 2803 and Natural Gas Choice Competition Act, 66 Pa. C.S. § 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.”

proposing amendments to the existing LIURP Regulations and seeking public comment on the proposed amendments. The proceeding is still ongoing at the time of this publication.

CAP Policy Statement

The PUC's CAP Policy Statement¹⁶ was amended effective March 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 March 21, 2020 (November 2019 Order and November 2019 Annex).¹⁷ The amendments include lower recommended maximum energy burden targets for electric and natural gas CAP bills. Before or during 2022, two EDCs (Duquesne and PECO Electric) and four NGDCs (PECO Gas, Peoples, PGW and UGI Utilities – Gas) established maximum CAP bills at or below the recommended energy burden levels in the CAP Policy Statement. This change contributed to an increase of spending on CAP Credits to subsidize CAP customer 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.¹⁸ The updated annual allocation factor for 2022 splits the combination group into 85% electric and 15% 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 from 2020 through 2022 compared to previous years. It is recommended that readers of this report also refer to the 2019 and 2021 Universal Service Programs & Collections Reports as a companion to this report for additional context. Please see [Appendix 4](#) for instructions on accessing previous reports.

To address public health and safety concerns, on March 6, 2020, Governor Tom Wolf issued a Proclamation of Disaster Emergency in response to the COVID-19 pandemic (*Emergency Proclamation*).¹⁹ On March 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 was necessary to ameliorate a safety emergency or unless otherwise determined by the PUC. The *Emergency Order* also encouraged utilities to reconnect previously terminated service if such action could be done safely.²⁰

On Oct. 13, 2020, the PUC entered an Order modifying the *Emergency Order* by initiating Phase 2 of the public utility service termination moratorium (October 2020 Order).²¹ The October 2020 Order lifted the termination moratorium for certain customers effective Nov. 9, 2020, but continued the termination moratorium for "protected

¹⁶ 52 Pa. Code §§ 69.261–69.267.

¹⁷ See *Final Policy Statement and Order*, Docket No. M-2019-3012599 (Order and Annex entered on Nov. 5, 2019).

¹⁸ See *Pa. PUC v. PECO Energy Company – Gas Division*, Docket No. R-2008-2028394, *et al.* (approved by Order entered on Oct. 29, 2008).

¹⁹ The proclamation, which has since expired, is available at <https://www.fmcsa.dot.gov/sites/fmcsa.dot.gov/files/2020-03/Pennsylvania%2020200306-COVID19-Digital-Proclamation.pdf>. (Accessed on May 18, 2023.)

²⁰ See *Public Utility Service Termination Moratorium Proclamation of Disaster Emergency-COVID-19*, Docket No. M-2020-3019244 (*Emergency Order* ratified on March 26, 2020).

²¹ See *Public Utility Service Termination Moratorium - Modification of March 13th Emergency Order*, Docket No. M-2020-3019244 (Order entered on Oct. 13, 2020).

customers” at or below 300% of the FPIG, under certain conditions, and established protections for certain residential and small business customers.

On March 18, 2021, the PUC entered an Order lifting the utility service termination moratorium effective April 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 PUC’s jurisdiction.²² The requirement that public utilities offer extended payment arrangement terms expired on Sept. 30, 2021.²³

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,²⁴ 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, the *Emergency Rental Assistance Program*, and the *Homeowners Assistance Fund*) via the *American Rescue Plan Act of 2021* may have increased the amount of payment assistance and decreased the number of payment arrangements and arrears of confirmed low-income customers for public utilities in 2021 and 2022.

Impact of Increased Supply Rates in 2022

It is worth noting that 2022 saw multiple increases in both electric and natural gas supply rates throughout the year. These increased rates may have impacted collections and universal service metrics reported by the utilities in 2022.

New for 2022

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 2022:

Payment Troubled Customers

- Electric Payment Troubled Customers – 2020-2022
- Natural Gas Payment Troubled Customers – 2020-2022

Percent of Total Dollars Owed – On an Arrangement Versus Not On an Arrangement

- Percent of Dollars Owed on an Arrangement – Residential Electric Customers – 2020-2022
- Percent of Dollars Owed on an Arrangement – Residential Natural Gas Customers – 2020-2022
- Percent of Dollars Owed on an Arrangement – Confirmed Low-Income Electric Customers – 2020-2022
- Percent of Dollars Owed on an Arrangement – Confirmed Low-Income Natural Gas Customers – 2020-2022

²² See *Public Utility Service Termination Moratorium*, Docket No. M-2020-3019244 (Order entered on March 18, 2021).

²³ 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).

²⁴ For example: See PPL Petition at Docket No. M-2016-2554787 (Secretarial Letter issued on March 30, 2020); and Duquesne Petition at Docket Nos. M-2016-2534323 and P-2020-3019460 (Secretarial Letter issued on April 17, 2020).

Average Arrearage

- The data in the following tables has been changed to show the Average Arrearage “On an Agreement” and “Not on an Agreement” rather than only the Overall Average Arrearage:
 - Average Arrearage – Residential Electric Customers – 2020-2022
 - Average Arrearage – Residential Natural Gas Customers – 2020-2022
 - Average Arrearage – Confirmed Low-Income Electric Customers – 2020-2022
 - Average Arrearage – Confirmed Low-Income Natural Gas Customers – 2020-2022

Accounts Exceeding \$10,000 in Arrearages

- Total Number of Accounts Over \$10,000 – Electric Customers – 2022
- Total Number of Accounts Over \$10,000 – Natural Gas Customers – 2022

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. Some totals may be affected by rounding.**²⁵

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.

Number of Residential Electric Customers – 2020-2022

Utility	2020 Residential Customers	2021 Residential Customers	2022 Residential Customers
Duquesne	541,210	543,300	545,897
Met-Ed	508,754	512,216	515,226
PECO-Electric	1,502,478	1,513,368	1,521,223
Penelec	501,634	501,816	501,008
Penn Power	147,020	148,138	148,927
PPL	1,243,502	1,251,196	1,256,135
West Penn	630,038	632,415	631,990
Total/Industry Average	5,074,636	5,102,449	5,120,406

Number of Residential Natural Gas Customers – 2020-2022

Utility	2020 Residential Customers	2021 Residential Customers	2022 Residential Customers
Columbia	405,653	407,892	409,611
NFG	197,945	198,007	196,741
PECO-Gas	490,074	495,160	500,154
Peoples	591,996	593,089	594,250
PGW	486,934	488,817	487,336
UGI Utilities – Gas	604,375	611,631	618,589
Total/Industry Average	2,776,977	2,794,595	2,806,681

²⁵ There may also be differences between similar metrics captured for individual public utilities in other PUC reports due to data rounding.

Confirmed Low-Income Electric Customers – 2022

Utility	Number of Confirmed Low-Income Customers	Percent of Residential Customers
Duquesne	51,118	9.4%
Met-Ed	58,174	11.3%
PECO-Electric	145,073	9.5%
Penelec	72,888	14.5%
Penn Power	16,327	11.0%
PPL	199,360	15.9%
West Penn	63,157	10.0%
Total/Industry Average	606,097	11.8%

Confirmed Low-Income Natural Gas Customers – 2022

Utility	Number of Confirmed Low-Income Customers	Percent of Residential Customers
Columbia	70,084	17.1%
NFG	23,458	11.9%
PECO-Gas	28,962	5.8%
Peoples	108,055	18.2%
PGW	115,093	23.6%
UGI Utilities – Gas	85,018	13.7%
Total/Industry Average	430,671	15.3%

Confirmed Low-Income Electric Customers – 2020-2022

Utility	2020		2021		2022	
	Number	Percent of Total	Number	Percent of Total	Number	Percent of Total
Duquesne	47,619	8.8%	48,153	8.9%	51,118	9.4%
Met-Ed	73,106	14.4%	57,945	11.3%	58,174	11.3%
PECO-Electric	135,579	9.0%	141,040	9.3%	145,073	9.5%
Penelec	90,218	18.0%	72,750	14.5%	72,888	14.5%
Penn Power	19,902	13.5%	16,136	10.9%	16,327	11.0%
PPL	193,879	15.6%	196,684	15.7%	199,360	15.9%
West Penn	75,210	11.9%	63,110	10.0%	63,157	10.0%
Total/Industry Average	635,513	12.5%	595,818	11.7%	606,097	11.8%

Confirmed Low-Income Natural Gas Customers – 2020-2022

Utility	2020		2021		2022	
	Number	Percent of Total	Number	Percent of Total	Number	Percent of Total
Columbia	68,078	16.8%	68,168	16.7%	70,084	17.1%
NFG	35,241	17.8%	22,517	11.4%	23,458	11.9%
PECO-Gas	26,216	5.3%	27,492	5.6%	28,962	5.8%
Peoples	108,540	18.3%	108,417	18.3%	108,055	18.2%
PGW	133,785	27.5%	110,364	22.6%	115,093	23.6%
UGI Utilities – Gas	77,553	12.8%	78,450	12.8%	85,018	13.7%
Total/Industry Average	449,413	16.2%	415,408	14.9%	430,671	15.3%

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 PUC for distribution to the EDCs and NGDCs for use in determining the estimated number of low-income customers.

Estimated Low-Income Electric Customers – 2022

Utility	Number of Estimated Low-Income Customers	Estimated Percent of Residential Customers
Duquesne	121,712	22.3%
Met-Ed	108,921	21.1%
PECO-Electric	370,514	24.4%
Penelec	146,133	29.2%
Penn Power	34,417	23.1%
PPL	398,427	31.7%
West Penn	149,880	23.7%
Total/Industry Average	1,330,004	26.0%

Estimated Low-Income Natural Gas Customers – 2022

Utility	Number of Estimated Low-Income Customers	Estimated Percent of Residential Customers
Columbia	91,849	22.4%
NFG	58,488	29.7%
PECO-Gas	78,627	15.7%
Peoples	146,971	24.7%
PGW	183,969	37.7%
UGI Utilities – Gas	166,539	26.9%
Total/Industry Average	726,443	25.9%

Estimated Low-Income Electric Customers – 2020-2022

Utility	2020		2021		2022	
	Number	Percent of Total	Number	Percent of Total	Number	Percent of Total
Duquesne	103,434	19.1%	121,772*	22.4%	121,712	22.3%
Met-Ed	113,660	22.3%	109,201	21.3%	108,921	21.1%
PECO-Electric	388,000	25.8%	373,840	24.7%	370,514	24.4%
Penelec	151,836	30.3%	146,334	29.2%	146,133	29.2%
Penn Power	35,146	23.9%	34,284	23.1%	34,417	23.1
PPL	299,496	24.1%	337,091	26.9%	398,427	31.7%
West Penn	154,975	24.6%	150,562	23.8%	149,880	23.7
Total/Industry Average	1,246,547	24.6%	1,273,084	25.0%	1,330,004	26.0%

*Duquesne reports that 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 – 2020-2022

Utility	2020		2021		2022	
	Number	Percent of Total	Number	Percent of Total	Number	Percent of Total
Columbia	96,648	23.8%	91,855	22.5%	91,849	22.4%
NFG	59,860	30.2%	58,794	29.7%	58,488	29.7%
PECO-Gas	80,638	16.5%	78,201	15.8%	78,627	15.7%
Peoples	152,309	25.7%	147,077	24.8%	146,971	24.7%
PGW	195,215	40.1%	187,901	38.4%	183,969	37.7%
UGI Utilities – Gas	151,918	25.1%	148,690	24.3%	166,539	26.9%
Total/Industry Average	736,588	26.5%	712,518	25.5%	726,443	25.9%

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.²⁶ A **payment arrangement**²⁷ 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.²⁸ 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,²⁹ 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.

Electric Payment Troubled Customers – 2022

Utility	Residential	Confirmed Low-Income	Percent of Payment Troubled Customers which are Confirmed Low-Income
Duquesne	975	256	26.3%
Met-Ed	612	380	62.1%
PECO-Electric	4,664	870	18.7%
Penelec	529	348	65.8%
Penn Power	135	90	66.7%
PPL	27,945	16,521	59.1%
West Penn	541	332	61.4%
Total/Industry Average	35,402	18,796	53.1%

Natural Gas Payment Troubled Customers – 2022

Utility	Residential	Confirmed Low-Income	Percent of Payment Troubled Customers which are Confirmed Low-Income
Columbia	11,902	7,028	59.0%
NFG	6,615	3,276	49.5%
PECO-Gas	1,369	267	19.5%
Peoples	17,910	9,219	51.5%
PGW	32,974	22,000	66.7%
UGI Utilities – Gas	18,419	17,139	93.1%
Total/Industry Average	89,189	58,929	66.1%

²⁶ 52 Pa. Code § 54.72 or § 62.2

²⁷ 52 Pa. Code § 56.2

²⁸ 66 Pa. C.S. § 1405(d)

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

Electric Payment Troubled Customers – 2020-2022

Utility	2020		2021		2022	
	Residential	Confirmed Low-Income	Residential	Confirmed Low-Income	Residential	Confirmed Low-Income
Duquesne	113	14	1,566	333	975	256
Met-Ed	426	280	767	493	612	380
PECO-Electric	1,188	200	5,043	596	4,664	870
Penelec	406	275	776	531	529	348
Penn Power	107	72	176	118	135	90
PPL*	9,650	6,019	19,466	12,305	27,945	16,521
West Penn	426	269	760	495	541	332
Total/Industry Average	12,316	7,129	28,553	14,870	35,402	18,796

*PPL previously counted all accounts on agreements plus the total number of accounts in arrears not on agreements as the total for “payment troubled.” Consistent with the reporting requirements, PPL’s data for 2022 now identifies “payment troubled customers” as accounts having a defaulted payment agreement within 1-year. PPL provided corrected data for 2020 and 2021, which is reflected in the table.

Natural Gas Payment Troubled Customers – 2020-2022

Utility	2020		2021		2022	
	Residential	Confirmed Low-Income	Residential	Confirmed Low-Income	Residential	Confirmed Low-Income
Columbia	12,775	7,689	14,374	8,573	11,902	7,028
NFG	8,645	4,562	4,141	1,884	6,615	3,276
PECO-Gas	402	66	1,393	169	1,369	267
Peoples	19,732	9,514	18,647	9,430	17,910	9,219
PGW	32,598	27,283	19,014	13,789	32,974	22,000
UGI Utilities – Gas	19,362	18,815	14,036	13,286	18,419	17,139
Total/Industry Average	93,514	67,929	71,605	47,131	89,189	58,929

Number of Payment Arrangements

The method³⁰ 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 March 18, 2021 Order beyond the expiration date of the requirement on Sept. 30, 2021.

Electric Payment Arrangements – 2022

Utility	Residential	Confirmed Low-Income	Percent of Payment Arrangements which are Confirmed Low-Income
Duquesne	28,283	6,312	22.3%
Met-Ed	31,462	17,513	55.7%
PECO-Electric	82,486	6,381	7.8%
Penelec	28,734	17,688	61.6%
Penn Power	6,927	4,180	60.3%
PPL	117,122	71,429	61.0%
West Penn	28,818	16,095	55.9%
Total/Industry Average	323,832	139,598	43.1%

Natural Gas Payment Arrangements – 2022

Utility	Residential	Confirmed Low-Income	Percent of Payment Arrangements which are Confirmed Low-Income
Columbia	23,385	13,401	57.3%
NFG	13,298	6,874	51.7%
PECO-Gas	28,409	1,904	6.7%
Peoples	15,461	7,015	45.4%
PGW	39,097	20,240	51.8%
UGI Utilities – Gas	22,108	19,913	90.1%
Total/Industry Average	141,758	69,347	48.9%

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

Electric Payment Arrangements – Residential Electric Customers – 2020-2022

Utility	2020 Payment Arrangements	2021 Payment Arrangements	2022 Payment Arrangements
Duquesne	17,124	44,726	28,283
Met-Ed	25,161	33,725	31,462
PECO-Electric	43,195	112,209	82,486
Penelec	23,699	34,438	28,734
Penn Power	5,683	8,078	6,927
PPL	70,975	142,633	117,122
West Penn	24,260	33,254	28,818
Total/Industry Average	210,097	409,063	323,832

Natural Gas Payment Arrangements – Residential Natural Gas Customers – 2020-2022

Utility	2020 Payment Arrangements	2021 Payment Arrangements	2022 Payment Arrangements
Columbia	20,541	28,064	23,385
NFG	6,374	13,248	13,298
PECO-Gas	17,298	33,771	28,409
Peoples	13,162	17,177	15,461
PGW	20,753	57,234	39,097
UGI Utilities – Gas	12,746	21,257	22,108
Total/Industry Average	90,874	170,751	141,758

Electric Payment Arrangements – Confirmed Low-Income Electric Customers – 2020-2022

Utility	2020 Payment Arrangements	2021 Payment Arrangements	2022 Payment Arrangements
Duquesne	2,503	8,210	6,312
Met-Ed	14,257	18,149	17,513
PECO-Electric	3,565	10,094	6,381
Penelec	14,310	20,398	17,688
Penn Power	3,272	4,673	4,180
PPL	46,413	91,665	71,429
West Penn	13,578	18,359	16,095
Total/Industry Average	97,898	171,548	139,598

Natural Gas Payment Arrangements – Confirmed Low-Income Natural Gas Customers – 2020-2022

Utility	2020 Payment Arrangements	2021 Payment Arrangements	2022 Payment Arrangements
Columbia	12,041	16,556	13,401
NFG	3,067	7,412	6,874
PECO-Gas	1,147	2,553	1,904
Peoples	5,603	8,926	7,015
PGW	15,161	12,253	20,240
UGI Utilities – Gas	9,835	19,166	19,913
Total/Industry Average	46,854	66,866	69,347

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 PUC 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 March 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 April 1, 2021.

Terminations – Residential Electric Customers – 2020-2022

Utility	2020		2021		2022	
	Number	Termination Rate	Number	Termination Rate	Number	Termination Rate
Duquesne	0	0.0%	30,945	5.7%	30,476	5.6%
Met-Ed	848	0.2%	26,941	5.3%	28,816	5.6%
PECO-Electric	80	<0.1%	76,313	5.0%	75,516	5.0%
Penelec	850	0.2%	20,354	4.1%	20,488	4.1%
Penn Power	174	0.1%	2,416	1.6%	3,244	2.2%
PPL	1,502	0.1%	30,843	2.5%	35,241	2.8%
West Penn	909	0.1%	16,147	2.6%	21,021	3.3%
Total/Industry Average	4,363	0.1%	203,959	4.0%	214,793	4.2%

Terminations – Residential Natural Gas Customers – 2020-2022

Utility	2020		2021		2022	
	Number	Termination Rate	Number	Termination Rate	Number	Termination Rate
Columbia	12	<0.1%	9,760	2.4%	11,380	2.8%
NFG	0	0.0%	7,091	3.6%	6,861	3.5%
PECO-Gas	30	<0.1%	12,634	2.6%	14,527	2.9%
Peoples	823	0.1%	23,754	4.0%	15,335	2.6%
PGW	0	0%	15,669	3.2%	14,410	3.0%
UGI Utilities – Gas	357	<0.1%	23,013	3.8%	26,882	4.3%
Total/Industry Average	1,222	<0.1%	91,921	3.3%	89,395	3.2%

Terminations – Confirmed Low-Income Electric Customers – 2020-2022

Utility	2020		2021		2022	
	Number	Termination Rate	Number	Termination Rate	Number	Termination Rate
Duquesne	0	0.0%	7,198	14.9%	9,818	19.2%
Met-Ed	0	0.0%	12,996	22.4%	14,327	24.6%
PECO-Electric	0	0.0%	20,901	14.8%	27,174	18.7%
Penelec	0	0.0%	11,208	15.4%	11,525	15.8%
Penn Power	0	0.0%	1,248	7.7%	1,770	10.8%
PPL	0	0.0%	20,182	10.3%	21,583	10.8%
West Penn	0	0.0%	8,183	13.0%	10,716	17.0%
Total/Industry Average	0	0.0%	81,916	13.7%	96,913	16.0%

Terminations – Confirmed Low-Income Natural Gas Customers – 2020-2022

Utility	2020		2021		2022	
	Number	Termination Rate	Number	Termination Rate	Number	Termination Rate
Columbia	0	0.0%	5,475	8.0%	6,124	8.7%
NFG	0	0.0%	3,668	16.3%	3,260	13.9%
PECO-Gas	0	0.0%	3,332	12.1%	5,531	19.1%
Peoples	0	0.0%	5,973	5.5%	4,253	3.9%
PGW	0	0.0%	7,483	6.8%	9,548	8.3%
UGI Utilities – Gas	0	0.0%	3,555	4.5%	4,810	5.7%
Total/Industry Average	0	0.0%	29,486	7.1%	33,526	7.8%

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 and reconnections in 2020 compared to previous years. In cases where a public utility reported zero terminations, the reconnection rate cannot be calculated.

Reconnections – Residential Electric Customers – 2020-2022

Utility	2020		2021		2022	
	Number	Reconnection Rate	Number	Reconnection Rate	Number	Reconnection Rate
Duquesne	0	n/a	24,848	80.3%	23,976	78.7%
Met-Ed	485	57.2%	23,842	88.5%	25,389	88.0%
PECO-Electric	1,157	1,446.3%*	66,776	87.5%	61,999	82.1%
Penelec	480	56.5%	16,094	79.1%	16,268	79.4%
Penn Power	85	48.9%	1,844	76.3%	2,473	76.2%
PPL	840	55.9%	22,309	72.3%	24,378	69.2%
West Penn	536	59.0%	12,882	79.8%	17,148	81.6%
Total/Industry Average	3,583	82.1%	168,595	82.7%	171,631	79.9%

*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 – 2020-2022

Utility	2020		2021		2022	
	Number	Reconnection Rate	Number	Reconnection Rate	Number	Reconnection Rate
Columbia	235	1,958.3%*	5,503	56.4%	6,760	59.4%
NFG	167	n/a	5,095	71.0%	5,003	72.9%
PECO-Gas	162	540.0%*	11,924	94.4%	13,269	91.3%
Peoples	988	120.0%*	18,349	77.2%	11,840	77.2%
PGW	1,256	n/a	10,567	67.4%	9,716	67.4%
UGI Utilities – Gas	579	162.2%*	17,239	74.9%	19,924	74.1%
Total/Industry Average	3,387	277.2%	68,677	74.7%	66,512	74.4%

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

Reconnections – Confirmed Low-Income Electric Customers – 2020-2022

Utility	2020		2021		2022	
	Number	Reconnection Rate	Number	Reconnection Rate	Number	Reconnection Rate
Duquesne	0	n/a	6,042	83.9%	3,074	31.3%
Met-Ed	95	n/a	10,467	80.5%	10,787	75.3%
PECO-Electric	121	n/a	18,961	90.7%	23,258	85.6%
Penelec	98	n/a	8,128	72.5%	7,666	66.5%
Penn Power	24	n/a	856	68.6%	1,118	63.2%
PPL	0	n/a	15,544	77.0%	16,187	75.0%
West Penn	104	n/a	5,913	72.3%	7,245	67.6%
Total/Industry Average	442	n/a	65,911	80.5%	69,335	71.5%

Reconnections – Confirmed Low-Income Natural Gas Customers – 2020-2022

Utility	2020		2021		2022	
	Number	Reconnection Rate	Number	Reconnection Rate	Number	Reconnection Rate
Columbia	51	n/a	2,991	54.6%	3,273	53.4%
NFG	89	n/a	2,834	77.3%	2,464	75.6%
PECO-Gas	15	n/a	3,182	95.5%	5,193	93.9%
Peoples	405	n/a	5,083	85.1%	4,123	96.9%
PGW	701	n/a	5,913	79.0%	7,401	77.5%
UGI Utilities – Gas	17	n/a	2,776	78.1%	3,453	71.8%
Total/Industry Average	1,278	n/a	22,779	77.3%	25,907	77.3%

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 may be 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 regulations³¹ 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

³¹ 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.

Residential Electric Customers in Debt – 2022

Utility	On Arrangement		Not On Arrangement		Total in Debt	
	Number	Percent of Customers	Number	Percent of Customers	Number	Percent of Customers
Duquesne	11,476	2.1%	24,787	4.5%	36,262	6.6%
Met-Ed	21,169	4.1%	31,149	6.0%	52,318	10.2%
PECO-Electric	35,041	2.3%	88,745	5.8%	123,786	8.1%
Penelec	21,475	4.3%	34,225	6.8%	55,700	11.1%
Penn Power	5,416	3.6%	8,369	5.6%	13,784	9.3%
PPL	74,227	5.9%	119,094	9.5%	193,322	15.4%
West Penn	21,711	3.4%	35,453	5.6%	57,163	9.0%
Total/Industry Average	190,515	3.7%	341,821	6.7%	532,336	10.4%

Residential Natural Gas Customers in Debt – 2022

Utility	On Arrangement		Not On Arrangement		Total in Debt	
	Number	Percent of Customers	Number	Percent of Customers	Number	Percent of Customers
Columbia	14,899	3.6%	9,343	2.3%	24,241	5.9%
NFG	4,295	2.2%	12,792	6.5%	17,087	8.7%
PECO-Gas	12,261	2.5%	21,676	4.3%	33,937	6.8%
Peoples	9,813	1.7%	34,056	5.7%	43,869	7.4%
PGW	11,386	2.3%	82,088	16.8%	93,474	19.2%
UGI Utilities – Gas	25,797	4.2%	37,305	6.0%	63,101	10.2%
Total/Industry Average	78,449	2.8%	197,260	7.0%	275,709	9.8%

Confirmed Low-Income Electric Customers in Debt – 2022

Utility	On Arrangement		Not On Arrangement		Total in Debt	
	Number	Percent of Customers	Number	Percent of Customers	Number	Percent of Customers
Duquesne	2,508	4.9%	2,919	5.7%	5,427	10.6%
Met-Ed	12,205	21.0%	16,087	27.7%	28,291	48.6%
PECO-Electric	3,133	2.2%	3,588	2.5%	6,721	4.6%
Penelec	13,620	18.7%	19,166	26.3%	32,786	45.0%
Penn Power	3,372	20.7%	4,373	26.8%	7,745	47.4%
PPL	25,859	13.0%	43,883	22.0%	69,742	35.0%
West Penn	12,730	20.2%	17,712	28.0%	30,441	48.2%
Total/Industry Average	73,427	12.1%	107,727	17.8%	181,154	29.9%

Confirmed Low-Income Natural Gas Customers in Debt – 2022

Utility	On Arrangement		Not On Arrangement		Total in Debt	
	Number	Percent of Customers	Number	Percent of Customers	Number	Percent of Customers
Columbia	6,688	9.5%	2,632	3.8%	9,321	13.3%
NFG	1,646	7.0%	3,283	14.0%	4,930	21.0%
PECO-Gas	842	2.9%	821	2.8%	1,663	5.7%
Peoples	5,451	5.0%	9,649	8.9%	15,101	14.0%
PGW	4,869	4.2%	6,130	5.3%	10,999	9.6%
UGI Utilities – Gas	23,106	27.2%	2,840	3.3%	25,946	30.5%
Total/Industry Average	42,603	9.9%	25,356	5.9%	67,958	15.8%

Residential Electric Customers in Debt – 2020-2022

Utility	2020		2021		2022	
	Number	Percent of Residential Customers	Number	Percent of Residential Customers	Number	Percent of Residential Customers
Duquesne	51,002	9.4%	35,349	6.5%	35,479	6.5%
Met-Ed	52,006	10.2%	49,662	9.7%	52,652	10.2%
PECO-Electric	126,334	8.4%	117,918	7.8%	123,786	8.1%
Penelec	56,340	11.2%	53,935	10.7%	55,700	11.1%
Penn Power	13,270	9.0%	13,285	9.0%	13,784	9.3%
PPL	184,661	14.9%	180,979	14.5%	193,322	15.4%
West Penn	59,946	9.5%	57,225	9.0%	57,163	9.0%
Total/Industry Average	543,559	10.7%	508,352	10.0%	531,886	10.4%

Residential Natural Gas Customers in Debt – 2020-2022

Utility	2020		2021		2022	
	Number	Percent of Residential Customers	Number	Percent of Residential Customers	Number	Percent of Residential Customers
Columbia	30,976	7.6%	24,904	6.1%	24,241	5.9%
NFG	20,697*	10.5%*	15,960	8.1%	17,087	8.7%
PECO-Gas	35,427	7.2%	32,084	6.5%	33,937	6.8%
Peoples	49,461	8.4%	35,565	6.0%	43,869	7.4%
PGW	86,625	17.8%	85,614	17.5%	93,474	19.2%
UGI Utilities – Gas	63,925	10.6%	56,070	9.7%	63,101	10.2%
Total/Industry Average	287,111	10.3%	253,197	9.1%	275,709	9.8%

*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 2020.

Confirmed Low-Income Electric Customers in Debt – 2020-2022

Utility	2020		2021		2022	
	Number	Percent of Residential Customers	Number	Percent of Residential Customers	Number	Percent of Residential Customers
Duquesne	6,058	12.7%	5,027	10.4%	5,427	10.6%
Met-Ed	28,992	39.7%	27,554	47.6%	28,291	48.6%
PECO-Electric	6,840	5.0%	6,076	4.3%	6,721	4.6%
Penelec	34,119	37.8%	32,330	44.4%	32,786	45.0%
Penn Power	7,603	38.2%	7,547	46.8%	7,745	47.4%
PPL	63,617	32.8%	64,123	32.6%	69,742	35.0%
West Penn	32,669	43.4%	31,361	49.7%	30,441	48.2%
Total/Industry Average	179,898	28.3%	174,019	29.2%	181,154	29.9%

Confirmed Low-Income Natural Gas Customers in Debt – 2020-2022

Utility	2020		2021		2022	
	Number	Percent of Residential Customers	Number	Percent of Residential Customers	Number	Percent of Residential Customers
Columbia	12,096	17.8%	9,671	14.2%	9,321	13.3%
NFG	n/a*	n/a*	4,939*	21.9%*	4,930	21.0%
PECO-Gas	2,189	8.3%	1,879	6.8%	1,663	5.7%
Peoples	17,113	15.8%	11,808	10.9%	15,101	14.0%
PGW	9,215	6.9%	8,266	7.5%	10,999	9.6%
UGI Utilities – Gas	25,872	33.4%	21,349	27.2%	25,946	30.5%
Total/Industry Average	66,485	14.8%	57,912	13.9%	67,958	15.8%

*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 2020.

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 – 2022

Utility	Dollars in Debt on an Arrangement	Dollars in Debt Not on an Arrangement	Total Dollars in Debt
Duquesne	\$11,605,732	\$6,145,895	\$17,751,627
Met-Ed	\$22,649,049	\$10,363,758	\$33,012,807
PECO-Electric	\$24,238,131	\$41,738,776	\$65,976,908
Penelec	\$26,588,692	\$11,578,939	\$38,167,631
Penn Power	\$7,442,539	\$3,149,113	\$10,591,653
PPL	\$55,613,227	\$60,276,159	\$115,889,386
West Penn	\$27,672,640	\$12,014,353	\$39,686,992
Total/Industry Average	\$175,810,011	\$145,266,993	\$321,077,003

Dollars in Debt – Residential Natural Gas Customers – 2022

Utility	Dollars in Debt on an Arrangement	Dollars in Debt Not on an Arrangement	Total Dollars in Debt
Columbia	\$14,655,362	\$4,461,475	\$19,116,837
NFG	\$2,256,619	\$3,588,122	\$5,844,741
PECO-Gas	\$10,560,756	\$15,208,754	\$25,769,510
Peoples	\$8,780,990	\$8,513,016	\$17,294,006
PGW	\$12,991,746	\$60,834,955	\$73,826,701
UGI Utilities – Gas	\$23,303,192	\$9,751,476	\$33,054,668
Total/Industry Average	\$72,548,664	\$102,357,798	\$174,906,462

Dollars in Debt – Confirmed Low-Income Electric Customers – 2022

Utility	Dollars in Debt on an Arrangement	Dollars in Debt Not on an Arrangement	Total Dollars in Debt
Duquesne	\$2,914,265	\$1,526,434	\$4,440,698
Met-Ed	\$14,894,232	\$8,304,711	\$23,198,942
PECO-Electric	\$4,092,347	\$5,849,513	\$9,941,860
Penelec	\$18,530,802	\$9,278,554	\$27,809,356
Penn Power	\$5,056,662	\$2,488,367	\$7,545,029
PPL	\$16,658,329	\$42,939,131	\$59,597,460
West Penn	\$18,478,753	\$9,498,069	\$27,976,822
Total/Industry Average	\$80,625,389	\$79,884,777	\$160,510,167

Dollars in Debt – Confirmed Low-Income Natural Gas Customers – 2022

Utility	Dollars in Debt on an Arrangement	Dollars in Debt Not on an Arrangement	Total Dollars in Debt
Columbia	\$7,461,448	\$1,441,281	\$8,902,729
NFG	\$1,030,018	\$1,609,443	\$2,639,461
PECO-Gas	\$1,537,131	\$2,052,267	\$3,589,399
Peoples	\$5,705,880	\$3,347,241	\$9,053,121
PGW	\$4,832,489	\$6,154,485	\$10,986,974
UGI Utilities – Gas	\$21,718,700	\$1,545,561	\$23,264,261
Total/Industry Average	\$42,285,666	\$16,150,278	\$58,435,944

Dollars in Debt – Residential Electric Customers – 2020-2022

Utility	2020 Total Dollars in Debt	2021 Total Dollars in Debt	2022 Total Dollars in Debt
Duquesne	\$27,810,181	\$21,561,462	\$17,751,627
Met-Ed	\$34,759,934	\$39,857,800	\$33,846,140
PECO-Electric	\$61,531,645	\$81,120,445	\$65,976,908
Penelec	\$39,215,902	\$45,798,344	\$38,167,631
Penn Power	\$9,665,159	\$11,860,193	\$10,591,653
PPL	\$111,292,761	\$125,991,260	\$115,889,386
West Penn	\$41,570,915	\$49,199,000	\$39,686,992
Total/Industry Average	\$325,846,497	\$375,388,503	\$321,077,003

Dollars in Debt – Residential Natural Gas Customers – 2020-2022

Utility	2020 Total Dollars in Debt	2021 Total Dollars in Debt	2022 Total Dollars in Debt
Columbia	\$20,631,558	\$20,254,646	\$19,116,837
NFG	\$7,348,401	\$6,778,738	\$5,844,741
PECO-Gas	\$24,104,822	\$30,865,393	\$25,769,510
Peoples	\$22,252,666	\$16,591,294	\$17,294,006
PGW	\$59,273,470	\$70,938,716	\$73,826,701
UGI Utilities – Gas	\$30,425,652	\$29,817,773	\$33,054,668
Total/Industry Average	\$164,036,569	\$175,246,559	\$174,906,462

Dollars in Debt – Confirmed Low-Income Electric Customers – 2020-2022

Utility	2020 Total Dollars in Debt	2021 Total Dollars in Debt	2022 Total Dollars in Debt
Duquesne	\$5,723,158	\$4,850,734	\$4,440,698
Met-Ed	\$24,026,543	\$28,254,365	\$23,198,942
PECO-Electric	\$7,835,523	\$10,203,625	\$9,941,860
Penelec	\$28,459,010	\$33,618,880	\$27,809,356
Penn Power	\$6,762,422	\$8,401,134	\$7,545,029
PPL	\$58,675,440	\$70,903,918	\$59,597,460
West Penn	\$28,856,451	\$34,609,710	\$27,976,822
Total/Industry Average	\$160,338,547	\$190,842,367	\$160,510,167

Dollars in Debt – Confirmed Low-Income Natural Gas Customers – 2020-2022

Utility	2020 Total Dollars in Debt	2021 Total Dollars in Debt	2022 Total Dollars in Debt
Columbia	\$10,217,185	\$10,002,748	\$8,902,729
NFG	\$3,741,231	\$3,168,551	\$2,639,461
PECO-Gas	\$3,102,961	\$3,944,046	\$3,589,399
Peoples	\$10,563,135	\$8,488,671	\$9,053,121
PGW	\$6,530,000	\$7,709,775	\$10,986,974
UGI Utilities – Gas	\$20,415,649	\$19,360,863	\$23,264,261
Total/Industry Average	\$54,570,161	\$52,674,654	\$58,435,944

Percent of Residential Dollars in Debt – Confirmed Low-Income Electric Customers – 2020-2022

Utility	2020 Percent of Total Dollars in Debt	2021 Percent of Total Dollars in Debt	2022 Percent of Total Dollars in Debt
Duquesne	20.6%	22.5%	25.0%
Met-Ed	69.1%	70.9%	68.5%
PECO-Electric	12.7%	12.6%	15.1%
Penelec	72.6%	73.4%	72.9%
Penn Power	70.0%	70.8%	71.2%
PPL	52.7%	56.3%	51.4%
West Penn	69.4%	70.3%	70.5%
Total/Industry Average	49.2%	50.8%	49.9%

Percent of Residential Dollars in Debt – Confirmed Low-Income Natural Gas Customers – 2020-2022

Utility	2020 Percent of Total Dollars in Debt	2021 Percent of Total Dollars in Debt	2022 Percent of Total Dollars in Debt
Columbia	49.5%	49.4%	46.6%
NFG	50.9%	46.7%	45.2%
PECO-Gas	12.9%	12.8%	13.9%
Peoples	47.5%	51.2%	52.3%
PGW	11.0%	10.9%	14.9%
UGI Utilities – Gas	67.1%	64.9%	70.4%
Total/Industry Average	33.3%	30.1%	33.4%

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 – 2022

Utility	Percent of Dollars Owed – On an Arrangement	Percent of Dollars Owed – Not on an Arrangement
Duquesne	65.4%	34.6%
Met-Ed	68.6%	31.4%
PECO-Electric	36.7%	63.3%
Penelec	69.7%	30.3%
Penn Power	70.3%	29.7%
PPL	48.0%	52.0%
West Penn	69.7%	30.3%
Total/Industry Average	54.8%	45.2%

***Percent of Dollars Owed on an Arrangement –
Residential Natural Gas Customers – 2022***

Utility	Percent of Dollars Owed – On an Arrangement	Percent of Dollars Owed – Not on an Arrangement
Columbia	76.7%	23.3%
NFG	38.6%	61.4%
PECO-Gas	41.0%	59.0%
Peoples	50.8%	49.2%
PGW	17.6%	82.4%
UGI Utilities – Gas	70.5%	29.5%
Total/Industry Average	41.5%	58.5%

***Percent of Dollars Owed on an Arrangement –
Confirmed Low-Income Electric Customers – 2022***

Utility	Percent of Dollars Owed – on an Arrangement	Percent of Dollars Owed – Not on an Arrangement
Duquesne	65.6%	34.4%
Met-Ed	64.2%	35.8%
PECO-Electric	41.2%	58.8%
Penelec	66.6%	33.4%
Penn Power	67.0%	33.0%
PPL	28.0%	72.0%
West Penn	66.1%	33.9%
Total/Industry Average	50.2%	49.8%

***Percent of Dollars Owed on an Arrangement –
Confirmed Low-Income Natural Gas Customers – 2022***

Utility	Percent of Dollars Owed – on an Arrangement	Percent of Dollars Owed – Not on an Arrangement
Columbia	83.8%	16.2%
NFG	39.0%	61.0%
PECO-Gas	42.8%	57.2%
Peoples	63.0%	37.0%
PGW	44.0%	56.0%
UGI Utilities – Gas	93.4%	6.6%
Total/Industry Average	72.4%	27.6%

**Percent of Dollars Owed on an Arrangement –
Residential Electric Customers – 2020-2022**

Utility	Percent of Dollars Owed – on an Arrangement			Percent of Dollars Owed – Not on an Arrangement		
	2020	2021	2022	2020	2021	2022
Duquesne	48.9%	55.0%	65.4%	51.1%	45.0%	34.6%
Met-Ed	57.6%	68.9%	68.6%	42.4%	31.1%	31.4%
PECO-Electric	23.6%	45.3%	36.7%	76.4%	54.7%	63.3%
Penelec	58.8%	69.4%	69.7%	41.2%	30.6%	30.3%
Penn Power	59.3%	68.6%	70.3%	40.7%	31.4%	29.7%
PPL	22.3%	49.7%	48.0%	77.7%	50.3%	52.0%
West Penn	58.6%	68.5%	69.7%	41.4%	31.5%	30.3%
Total/Industry Average	38.7%	56.5%	54.8%	61.3%	43.5%	45.2%

**Percent of Dollars Owed on an Arrangement –
Residential Natural Gas Customers – 2020-2022**

Utility	Percent of Dollars Owed – on an Arrangement			Percent of Dollars Owed – Not on an Arrangement		
	2020	2021	2022	2020	2021	2022
Columbia	64.0%	76.4%	76.7%	36.0%	23.6%	23.3%
NFG	13.2%	37.1%	38.6%	86.8%	62.9%	61.4%
PECO-Gas	27.7%	48.8%	41.0%	72.3%	51.2%	59.0%
Peoples	52.6%	51.2%	50.8%	47.4%	48.8%	49.2%
PGW	7.7%	28.1%	17.6%	92.3%	71.9%	82.4%
UGI Utilities – Gas	67.4%	65.3%	70.5%	32.6%	34.7%	29.5%
Total/Industry Average	35.1%	46.2%	41.5%	64.9%	53.8%	58.5%

**Percent of Dollars Owed on an Arrangement –
Confirmed Low-Income Electric Customers – 2020-2022**

Utility	Percent of Dollars Owed – on an Arrangement			Percent of Dollars Owed – Not on an Arrangement		
	2020	2021	2022	2020	2021	2022
Duquesne	50.6%	54.3%	65.6%	49.4%	45.7%	34.4%
Met-Ed	59.7%	64.7%	64.2%	40.3%	35.3%	35.8%
PECO-Electric	36.5%	54.3%	41.2%	63.5%	45.7%	58.8%
Penelec	60.3%	66.0%	66.6%	39.7%	34.0%	33.4%
Penn Power	61.6%	65.5%	67.0%	38.4%	34.5%	33.0%
PPL	8.1%	35.2%	28.0%	91.9%	64.8%	72.0%
West Penn	60.4%	65.0%	66.1%	39.6%	35.0%	33.9%
Total/Industry Average	39.7%	53.2%	50.2%	60.3%	46.8%	49.8%

**Percent of Dollars Owed on an Arrangement –
Confirmed Low-Income Natural Gas Customers – 2020-2022**

Utility	Percent of Dollars Owed – on an Arrangement			Percent of Dollars Owed – Not on an Arrangement		
	2020	2021	2022	2020	2021	2022
Columbia	74.7%	84.3%	83.8%	25.3%	15.7%	16.2%
NFG	12.6%	38.3%	39.0%	87.4%	61.7%	61.0%
PECO-Gas	40.4%	54.1%	42.8%	59.6%	45.9%	57.2%
Peoples	61.8%	60.3%	63.0%	38.2%	39.7%	37.0%
PGW	39.2%	56.6%	44.0%	60.8%	43.4%	56.0%
UGI Utilities – Gas	95.3%	93.9%	93.4%	4.7%	6.1%	6.6%
Total/Industry Average	69.5%	74.9%	72.4%	30.5%	25.1%	27.6%

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.

Average Arrearage – Residential Electric Customers – 2022

Utility	Average Arrearage on an Arrangement	Average Arrearage Not on an Arrangement	Overall Average Arrearage
Duquesne	\$1,085.42	\$247.95	\$500.34
Met-Ed	\$1,109.27	\$329.19	\$642.83
PECO-Electric	\$691.71	\$470.32	\$532.99
Penelec	\$1,238.12	\$338.32	\$685.24
Penn Power	\$1,374.26	\$376.29	\$768.38
PPL	\$749.23	\$506.12	\$599.46
West Penn	\$1,274.61	\$338.89	\$694.27
Total/Industry Average	\$931.02	\$424.57	\$605.22

Average Arrearage – Residential Natural Gas Customers – 2022

Utility	Average Arrearage on an Arrangement	Average Arrearage Not on an Arrangement	Overall Average Arrearage
Columbia	\$983.68	\$477.53	\$788.61
NFG	\$525.40	\$280.50	\$342.06
PECO-Gas	\$861.36	\$701.63	\$759.34
Peoples	\$894.86	\$249.97	\$394.22
PGW	\$1,141.05	\$741.10	\$789.81
UGI Utilities – Gas	\$903.34	\$261.40	\$523.84
Total/Industry Average	\$924.78	\$518.90	\$634.39

Average Arrearage – Confirmed Low-Income Electric Customers – 2022

Utility	Average Arrearage on an Arrangement	Average Arrearage Not on an Arrangement	Overall Average Arrearage
Duquesne	\$1,161.79	\$522.99	\$818.25
Met-Ed	\$1,220.36	\$516.25	\$820.00
PECO-Electric	\$1,306.31	\$1,630.34	\$1,479.30
Penelec	\$1,360.53	\$484.11	\$848.20
Penn Power	\$1,499.64	\$569.03	\$974.19
PPL	\$644.20	\$978.49	\$854.54
West Penn	\$1,451.60	\$536.27	\$919.04
Total/Industry Average	\$1,098.03	\$741.55	\$886.04

Average Arrearage – Confirmed Low-Income Natural Gas Customers – 2022

Utility	Average Arrearage on an Arrangement	Average Arrearage Not on an Arrangement	Overall Average Arrearage
Columbia	\$1,115.59	\$547.51	\$955.15
NFG	\$625.71	\$490.19	\$535.44
PECO-Gas	\$1,824.86	\$2,501.24	\$2,158.61
Peoples	\$1,046.70	\$346.89	\$599.51
PGW	\$992.54	\$1,004.05	\$998.95
UGI Utilities – Gas	\$939.98	\$544.18	\$896.65
Total/Industry Average	\$992.56	\$636.95	\$859.88

Average Arrearage – Residential Electric Customers – 2020-2022

Utility	2020 Average Arrearage		2021 Average Arrearage		2022 Average Arrearage	
	On an Agreement	Not on an Agreement	On an Agreement	Not on an Agreement	On an Agreement	Not on an Agreement
Duquesne	\$1,156.17	\$362.26	\$1,153.30	\$386.80	\$1,085.42	\$247.95
Met-Ed	\$1,034.37	\$451.31	\$1,392.37	\$414.04	\$1,109.27	\$329.19
PECO-Electric	\$772.98	\$437.03	\$908.74	\$572.77	\$691.71	\$470.32
Penelec	\$1,127.32	\$450.31	\$1,520.54	\$424.18	\$1,238.12	\$338.32
Penn Power	\$1,191.78	\$464.86	\$1,586.25	\$456.38	\$1,374.26	\$376.29
PPL	\$527.88	\$628.23	\$949.17	\$551.25	\$749.23	\$506.12
West Penn	\$1,158.20	\$442.19	\$1,600.58	\$428.68	\$1,274.61	\$338.89
Total/Industry Average	\$880.57	\$498.89	\$1,157.06	\$502.12	\$931.02	\$424.57

Average Arrearage – Residential Natural Gas Customers – 2020-2022

Utility	2020 Average Arrearage		2021 Average Arrearage		2022 Average Arrearage	
	On an Agreement	Not on an Agreement	On an Agreement	Not on an Agreement	On an Agreement	Not on an Agreement
Columbia	\$868.67	\$470.66	\$1,059.90	\$463.80	\$983.68	\$477.53
NFG	\$60.28*	\$351.84*	\$643.39	\$353.89	\$525.40	\$280.50
PECO-Gas	\$919.80	\$618.74	\$1,099.62	\$859.58	\$861.36	\$701.63
Peoples	\$897.44	\$289.67	\$1,062.73	\$293.82	\$894.86	\$249.97
PGW	\$529.17	\$701.42	\$1,252.38	\$731.96	\$1,141.05	\$741.10
UGI Utilities – Gas	\$784.68	\$262.62	\$912.46	\$274.38	\$903.34	\$261.40
Total/Industry Average	\$667.39	\$496.60	\$1,045.11	\$536.70	\$924.78	\$518.90

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

Average Arrearage – Confirmed Low-Income Electric Customers – 2020-2022

Utility	2020 Average Arrearage		2021 Average Arrearage		2022 Average Arrearage	
	On an Agreement	Not on an Agreement	On an Agreement	Not on an Agreement	On an Agreement	Not on an Agreement
Duquesne	\$1,367.17	\$717.47	\$1,293.88	\$740.92	\$1,161.79	\$522.99
Met-Ed	\$1,117.88	\$599.41	\$1,608.35	\$615.87	\$1,220.36	\$516.25
PECO-Electric	\$1,006.73	\$1,243.98	\$1,564.98	\$1,838.86	\$1,306.31	\$1,630.34
Penelec	\$1,187.12	\$574.71	\$1,696.58	\$593.31	\$1,360.53	\$484.11
Penn Power	\$1,261.39	\$603.73	\$1,756.69	\$655.92	\$1,499.64	\$569.03
PPL	\$464.21	\$1,009.75	\$1,024.12	\$1,155.73	\$644.20	\$978.49
West Penn	\$1,252.76	\$609.10	\$1,822.44	\$636.74	\$1,451.60	\$536.27
Total/Industry Average	\$1,065.91	\$804.64	\$1,454.39	\$856.74	\$1,098.03	\$741.55

Average Arrearage – Confirmed Low-Income Natural Gas Customers – 2020-2022

Utility	2020 Average Arrearage		2021 Average Arrearage		2022 Average Arrearage	
	On an Agreement	Not on an Agreement	On an Agreement	Not on an Agreement	On an Agreement	Not on an Agreement
Columbia	\$1,038.94	\$544.03	\$1,199.96	\$593.20	\$1,115.59	\$547.51
NFG	n/a*	n/a*	\$744.11*	\$590.92*	\$625.71	\$490.19
PECO-Gas	\$1,225.06	\$1,586.69	\$1,871.93	\$2,450.07	\$1,824.86	\$2,501.24
Peoples	\$939.92	\$398.69	\$1,143.29	\$459.52	\$1,046.70	\$346.89
PGW	\$486.73	\$1,004.40	\$870.40	\$1,028.73	\$992.54	\$1,004.05
UGI Utilities – Gas	\$810.28	\$514.34	\$944.23	\$564.72	\$939.98	\$544.18
Total/Industry Average	\$839.47	\$612.59	\$1,023.40	\$683.10	\$992.56	\$636.95

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

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.³² 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.³³ We present that data in the tables below, noting that PECO has reported electric and gas accounts together. The average arrearage is calculated by dividing the total arrearage (sum of all account balances over \$10,000) by the number of accounts. As a reminder, Confirmed Low-Income data is a subset of Residential data. References to percentages refer to the number of Confirmed Low-Income customers as a percentage of the total number of Residential customers.

³² *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.

³³ 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 Section 1410.1(3) reports are available at Docket No. M-2014-2448824.

Total Number of Accounts Over \$10,000 – Electric Customers – 2022

Utility	Number of Residential Accounts Over 10k	Number of Confirmed Low-Income Accounts Over 10k	Percent of Residential Accounts Over 10k that are Confirmed Low-Income
Duquesne	72	47	65.3%
Met-Ed	126	99	78.6%
PECO-Electric/Gas	499	295	59.1%
Penelec	207	158	76.3%
Penn Power	54	37	68.5%
PPL	352	187	53.1%
West Penn	196	153	78.1%
Total/Industry Average	1,506	976	64.8%

Total Number of Accounts Over \$10,000 – Natural Gas Customers – 2022

Utility	Number of Residential Accounts Over 10k	Number of Confirmed Low-Income Accounts Over 10k	Percent of Residential Accounts Over 10k that are Confirmed Low-Income
Columbia	3	3	100.0%
NFG	0	0	0.0%
Peoples	19	10	52.6%
PGW	385	290	73.4%
UGI Utilities – Gas	13	2	15.4%
Total/Industry Average	420	305	72.6%

Total Number of Accounts Over \$10,000 – Electric Customers – 2020-2022

Utility	2020		2021		2022	
	Residential	Confirmed Low-Income	Residential	Confirmed Low-Income	Residential	Confirmed Low-Income
Duquesne	99	32	106	52	72	47
Met-Ed	162	130	178	142	126	99
PECO-Electric/Gas	197	76	371	162	499	295
Penelec	224	181	245	185	207	158
Penn Power	57	46	74	55	54	37
PPL	440	62	374	247	352	187
West Penn	230	180	276	208	196	153
Total/Industry Average	1,409	707	1,624	1,051	1,506	976

Total Number of Accounts Over \$10,000 – Natural Gas Customers – 2020-2022

Utility	2020		2021		2022	
	Residential	Confirmed Low-Income	Residential	Confirmed Low-Income	Residential	Confirmed Low-Income
Columbia	3	3	0	0	3	3
NFG	0	0	0	0	0	0
Peoples	14	9	8	6	19	10
PGW	219	173	382	211	385	290
UGI Utilities – Gas	7	1	11	1	13	2
Total/Industry Average	243	186	401	218	420	305

Percent of Accounts Over \$10,000 – Confirmed Low-Income Electric Customers – 2020-2022

Utility	2020 Percent of Accounts Over 10k	2021 Percent of Accounts Over 10k	2022 Percent of Accounts Over 10k
Duquesne	32.3%	49.1%	65.3%
Met-Ed	80.2%	79.8%	78.6%
PECO-Electric/Gas	38.6%	43.7%	59.1%
Penelec	80.8%	75.5%	76.3%
Penn Power	80.7%	74.3%	68.5%
PPL	14.1%	66.0%	53.1%
West Penn	78.3%	75.4%	78.1%
Total/Industry Average	50.2%	64.7%	64.8%

Percent of Accounts Over \$10,000 – Confirmed Low-Income Natural Gas Customers – 2020-2022

Utility	2020 Percent of Accounts Over 10k	2021 Percent of Accounts Over 10k	2022 Percent of Accounts Over 10k
Columbia	100.0%	0.0%	100.0%
NFG	0.0%	0.0%	0.0%
Peoples	64.3%	75.0%	52.6%
PGW	79.0%	55.2%	73.4%
UGI Utilities – Gas	14.3%	9.1%	15.4%
Total/Industry Average	76.5%	54.4%	72.6%

Residential Total Arrearages of Accounts Over \$10,000 – Electric Customers – 2020-2022

Utility	2020 Total Arrearages of Accounts over 10k	2021 Total Arrearages of Accounts over 10k	2022 Total Arrearages of Accounts over 10k
Duquesne	\$1,367,612	\$1,442,651	\$960,595
Met-Ed	\$2,135,811	\$2,438,091	\$1,727,144
PECO-Electric/Gas	\$2,700,673	\$4,889,390	\$6,773,972
Penelec	\$3,118,889	\$3,444,472	\$3,011,909
Penn Power	\$763,622	\$1,032,617	\$811,828
PPL	\$6,202,758	\$5,416,845	\$5,401,687
West Penn	\$3,057,144	\$3,774,042	\$2,763,510
Total/Industry Average	\$19,346,509	\$22,438,107	\$21,450,645

Residential Total Arrearages of Accounts Over \$10,000 – Natural Gas Customers – 2020-2022

Utility	2020 Total Arrearages of Accounts over 10k	2021 Total Arrearages of Accounts over 10k	2022 Total Arrearages of Accounts over 10k
Columbia	\$39,675	\$0	\$32,330
NFG	\$0	\$0	\$0
Peoples	\$159,802	\$83,588	\$204,144
PGW	\$2,754,119	\$4,765,743	\$4,860,878
UGI Utilities – Gas	\$93,189	\$128,935	\$150,499
Total/Industry Average	\$3,046,785	\$4,978,266	\$5,247,851

Confirmed Low-Income Total Arrearages of Accounts Over \$10,000 – Electric Customers – 2020-2022

Utility	2020 Total Arrearages of Accounts over 10k	2021 Total Arrearages of Accounts over 10k	2022 Total Arrearages of Accounts over 10k
Duquesne	\$464,353	\$700,897	\$639,474
Met-Ed	\$1,698,593	\$1,962,142	\$1,344,805
PECO-Electric/Gas	\$1,056,369	\$2,117,840	\$3,919,344
Penelec	\$2,465,183	\$2,573,405	\$2,215,747
Penn Power	\$614,912	\$765,520	\$588,635
PPL	\$872,096	\$3,442,752	\$2,701,293
West Penn	\$2,376,500	\$2,804,062	\$2,163,846
Total/Industry Average	\$9,548,006	\$14,366,618	\$13,573,144

Confirmed Low-Income Total Arrearages of Accounts Over \$10,000 – Natural Gas Customers – 2020-2022

Utility	2020 Total Arrearages of Accounts over 10k	2021 Total Arrearages of Accounts over 10k	2022 Total Arrearages of Accounts over 10k
Columbia	\$39,675	\$0	\$32,330
NFG	\$0	\$0	\$0
Peoples	\$101,604	\$61,743	\$107,396
PGW	\$2,162,920	\$2,682,886	\$3,672,771
UGI Utilities – Gas	\$18,457	\$10,475	\$21,264
Total/Industry Average	\$2,322,655	\$2,755,104	\$3,833,761

Percent of Arrearages Over \$10,000 – Confirmed Low-Income Electric Customers – 2020-2022

Utility	2020 Percent of Arrearages Over 10k	2021 Percent of Arrearages Over 10k	2022 Percent of Arrearages Over 10k
Duquesne	34.0%	48.6%	66.6%
Met-Ed	79.5%	80.5%	77.9%
PECO-Electric/Gas	39.1%	43.3%	57.9%
Penelec	79.0%	74.7%	73.6%
Penn Power	80.5%	74.1%	72.5%
PPL	14.1%	63.6%	50.0%
West Penn	77.7%	74.3%	78.3%
Total/Industry Average	49.4%	64.0%	63.3%

Percent of Arrearages Over \$10,000 – Confirmed Low-Income Natural Gas Customers – 2020-2022

Utility	2020 Percent of Arrearages Over 10k	2021 Percent of Arrearages Over 10k	2022 Percent of Arrearages Over 10k
Columbia	100.0%	0.0%	100.0%
NFG	0.0%	0.0%	0.0%
Peoples	63.6%	73.9%	52.6%
PGW	78.5%	56.3%	75.6%
UGI Utilities – Gas	19.8%	8.1%	14.1%
Total/Industry Average	76.2%	55.3%	73.1%

Residential Average Arrearage of Accounts Over \$10,000 – Electric Customers – 2020-2022

Utility	2020 Average Arrearage of Accounts over 10k	2021 Average Arrearage of Accounts over 10k	2022 Average Arrearage of Accounts over 10k
Duquesne	\$13,814.27	\$13,609.92	\$13,341.60
Met-Ed	\$13,184.02	\$13,697.14	\$13,707.49
PECO-Electric/Gas	\$13,709.00	\$13,178.95	\$13,575.09
Penelec	\$13,923.61	\$14,059.07	\$14,550.29
Penn Power	\$13,396.87	\$13,954.28	\$15,033.85
PPL	\$14,097.18	\$14,483.54	\$15,345.70
West Penn	\$13,291.93	\$13,674.07	\$14,099.54
Total/Industry Average	\$13,730.67	\$13,816.57	\$14,243.46

Residential Average Arrearage of Accounts Over \$10,000 – Natural Gas Customers – 2020-2022

Utility	2020 Average Arrearage of Accounts over 10k	2021 Average Arrearage of Accounts over 10k	2022 Average Arrearage of Accounts over 10k
Columbia	\$13,224.92	\$0.00	\$10,776.67
NFG	\$0.00	\$0.00	\$0.00
Peoples	\$11,414.44	\$10,448.55	\$10,744.42
PGW	\$12,575.88	\$12,475.77	\$12,625.66
UGI Utilities – Gas	\$13,312.71	\$11,721.36	\$11,576.85
Total/Industry Average	\$12,538.21	\$12,414.63	\$12,494.88

Confirmed Low-Income Average Arrearage of Accounts Over \$10,000 – Electric Customers – 2020-2022

Utility	2020 Average Arrearage of Accounts over 10k	2021 Average Arrearage of Accounts over 10k	2022 Average Arrearage of Accounts over 10k
Duquesne	\$14,511.04	\$13,478.79	\$13,605.83
Met-Ed	\$13,066.10	\$13,817.90	\$13,583.89
PECO-Electric/Gas	\$13,899.60	\$13,073.08	\$13,285.91
Penelec	\$13,619.80	\$13,910.30	\$14,023.72
Penn Power	\$13,367.64	\$13,918.55	\$15,909.05
PPL	\$14,066.06	\$13,938.27	\$14,445.42
West Penn	\$13,202.78	\$13,481.07	\$14,142.78
Total/Industry Average	\$13,504.96	\$13,669.47	\$13,906.91

**Confirmed Low-Income Average Arrearage of Accounts Over \$10,000 – Natural Gas Customers
– 2020-2022**

Utility	2020 Average Arrearage of Accounts over 10k	2021 Average Arrearage of Accounts over 10k	2022 Average Arrearage of Accounts over 10k
Columbia	\$13,224.92	\$0.00	\$10,776.67
NFG	\$0.00	\$0.00	\$0.00
Peoples	\$11,289.32	\$10,290.49	\$10,739.60
PGW	\$12,502.43	\$12,715.10	\$12,664.73
UGI Utilities – Gas	\$18,456.63	\$10,474.61	\$10,632.00
Total/Industry Average	\$12,487.39	\$12,638.09	\$12,569.71

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 – 2022

Utility	Residential	Confirmed Low-Income	Percent Confirmed Low-Income
Duquesne	\$688,141,228	\$78,230,986	11.4%
Met-Ed	\$731,079,749	\$105,665,641	14.5%
PECO-Electric	\$2,408,490,352	\$144,597,771	6.0%
Penelec	\$636,217,593	\$120,867,637	19.0%
Penn Power	\$218,958,897	\$28,823,742	13.2%
PPL	\$2,443,754,604	\$480,255,397	19.7%
West Penn	\$783,519,557	\$101,240,256	12.9%
Total/Industry Average	\$7,910,161,980	\$1,059,681,430	13.4%

Residential Revenues (Billings) – Natural Gas Customers – 2022

Utility	Residential	Confirmed Low-Income	Percent Confirmed Low-Income
Columbia	\$595,926,018	\$92,401,675	15.5%
NFG	\$194,858,722	\$23,657,972	12.1%
PECO-Gas	\$545,551,199	\$23,353,153	4.3%
Peoples	\$648,509,452	\$116,734,701	18.0%
PGW	\$616,552,330	\$64,547,671	10.5%
UGI Utilities – Gas	\$699,559,163	\$41,406,828	5.9%
Total/Industry Average	\$3,300,956,934	\$362,102,000	11.0%

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 – 2020-2022

Utility	2020	2021	2022
Duquesne	4.7%	3.5%	2.6%
Met-Ed	5.7%	6.1%	4.6%
PECO-Electric	3.0%	3.9%	2.7%
Penelec	6.9%	7.9%	6.0%
Penn Power	5.2%	6.1%	4.8%
PPL	5.6%	6.1%	4.7%
West Penn	6.1%	7.4%	5.1%
Total/Industry Average	4.9%	5.5%	4.1%

Percent of Revenues (Billings) in Debt – Residential Natural Gas Customers – 2020-2022

Utility	2020	2021	2022
Columbia	4.3%	4.2%	3.2%
NFG	5.6%	4.7%	3.0%
PECO-Gas	5.9%	7.5%	4.7%
Peoples	4.7%	3.3%	2.7%
PGW	11.9%	13.6%	12.0%
UGI Utilities – Gas	6.3%	5.7%	4.7%
Total/Industry Average	6.7%	6.8%	6.2%

**Percent of Revenues (Billings) in Debt – Confirmed Low-Income Electric Customers –
2020-2022**

Utility	2020	2021	2022
Duquesne	9.1%	7.5%	5.7%
Met-Ed	25.8%	31.4%	22.0%
PECO-Electric	6.2%	7.9%	6.9%
Penelec	25.6%	32.0%	23.0%
Penn Power	26.6%	34.6%	26.2%
PPL	14.0%	18.1%	12.4%
West Penn	31.9%	41.6%	27.6%
Total/Industry Average	17.3%	21.5%	15.1%

**Percent of Revenues (Billings) in Debt – Confirmed Low-Income Natural Gas Customers –
2020-2022**

Utility	2020	2021	2022
Columbia	12.6%	23.3%	9.6%
NFG	21.6%	20.1%	11.2%
PECO-Gas	17.9%	22.1%	15.4%
Peoples	24.8%	10.4%	7.8%
PGW	6.0%	7.6%	17.0%
UGI Utilities – Gas	37.1%	45.1%	56.2%
Total/Industry Average	17.0%	17.4%	16.1%

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 – 2022

Utility	Residential	Confirmed Low-Income	Percent Confirmed Low-Income
Duquesne	\$16,619,579	\$4,323,759	26.0%
Met-Ed	\$14,650,554	\$10,495,428	71.6%
PECO-Electric	\$35,970,694	\$7,228,659	20.1%
Penelec	\$15,056,177	\$11,474,569	76.2%
Penn Power	\$3,627,804	\$2,627,240	72.4%
PPL	\$49,258,466	\$33,538,786	68.1%
West Penn	\$14,287,659	\$10,325,774	72.3%
Total/Industry Average	\$149,470,933	\$80,014,215	53.5%

Gross Write-Offs in Dollars – Natural Gas Customers – 2022

Utility	Residential	Confirmed Low-Income	Percent Confirmed Low-Income
Columbia	\$11,400,609	\$2,070,554	18.2%
NFG	\$3,515,466	\$2,239,447	63.7%
PECO-Gas	\$2,181,106	\$618,369	28.4%
Peoples	\$10,664,332	\$5,489,071	51.5%
PGW	\$40,690,124	\$14,736,599	36.2%
UGI Utilities – Gas	\$19,483,136	\$492,975	2.5%
Total/Industry Average	\$87,934,773	\$25,647,015	29.2%

Gross Write-Offs in Dollars – Residential Electric Customers – 2020-2022

Utility	2020 Gross Write-Offs in Dollars	2021 Gross Write-Offs in Dollars	2022 Gross Write-Offs in Dollars
Duquesne	\$13,917,013	\$16,401,937	\$16,619,579
Met-Ed	\$10,590,500	\$12,067,089	\$14,650,554
PECO-Electric	\$16,965,528	\$31,061,824	\$35,970,694
Penelec	\$11,281,446	\$12,539,131	\$15,056,177
Penn Power	\$2,406,621	\$2,394,623	\$3,627,804
PPL	\$32,110,096	\$45,878,601	\$49,258,466
West Penn	\$11,035,112	\$10,780,567	\$14,287,659
Total/Industry Average	\$98,306,316	\$131,123,772	\$149,470,933

Gross Write-Offs in Dollars – Residential Natural Gas Customers – 2020-2022

Utility	2020 Gross Write-Offs in Dollars	2021 Gross Write-Offs in Dollars	2022 Gross Write-Offs in Dollars
Columbia	\$4,204,533	\$10,761,148	\$11,400,609
NFG	\$4,079,349	\$2,047,895	\$3,515,466
PECO-Gas	\$1,397,822	\$1,906,534	\$2,181,106
Peoples	\$11,997,515	\$9,696,316	\$10,664,332
PGW	\$21,030,875	\$21,599,262	\$40,690,124
UGI Utilities – Gas	\$10,734,440	\$16,204,625	\$19,483,136
Total/Industry Average	\$53,444,534	\$62,215,780	\$87,934,773

Gross Write-Offs in Dollars – Confirmed Low-Income Electric Customers – 2020-2022

Utility	2020 Gross Write-Offs in Dollars	2021 Gross Write-Offs in Dollars	2022 Gross Write-Offs in Dollars
Duquesne	\$4,149,205	\$3,563,296	\$4,323,759
Met-Ed	\$8,106,239	\$8,630,700	\$10,495,428
PECO-Electric	\$4,082,863	\$4,238,342	\$7,228,659
Penelec	\$8,992,717	\$9,341,987	\$11,474,569
Penn Power	\$1,897,416	\$1,688,055	\$2,627,240
PPL	\$17,018,351	\$32,498,965	\$33,538,786
West Penn	\$8,341,292	\$7,779,493	\$10,325,774
Total/Industry Average	\$52,588,083	\$67,740,838	\$80,014,215

Gross Write-Offs in Dollars – Confirmed Low-Income Natural Gas Customers – 2020-2022

Utility	2020 Gross Write-Offs in Dollars	2021 Gross Write-Offs in Dollars	2022 Gross Write-Offs in Dollars
Columbia	\$2,250,506	\$4,750,005	\$2,070,554
NFG	\$2,653,618	\$1,264,922	\$2,239,447
PECO-Gas	\$560,272	\$444,631	\$618,369
Peoples	\$3,839,205	\$5,714,235	\$5,489,071
PGW	\$8,988,079	\$6,423,185	\$14,736,599
UGI Utilities – Gas	\$592,292	\$605,554	\$492,975
Total/Industry Average	\$18,883,972	\$19,202,532	\$25,647,015

Percentage of Gross Write-Offs – Confirmed Low-Income Electric Customers – 2020-2022

Utility	2020 Percent of Gross Write-Off Dollars	2021 Percent of Gross Write-Off Dollars	2022 Percent of Gross Write-Off Dollars
Duquesne	29.8%	21.7%	26.0%
Met-Ed	76.5%	71.5%	71.6%
PECO-Electric	24.1%	13.6%	20.1%
Penelec	79.7%	74.5%	76.2%
Penn Power	78.8%	70.5%	72.4%
PPL	53.0%	70.8%	68.1%
West Penn	75.6%	72.2%	72.3%
Total/Industry Average	53.5%	51.7%	53.5%

Percentage of Gross Write-Offs – Confirmed Low-Income Natural Gas Customers – 2020-2022

Utility	2020 Percent of Gross Write-Off Dollars	2021 Percent of Gross Write-Off Dollars	2022 Percent of Gross Write-Off Dollars
Columbia	53.5%	44.1%	18.2%
NFG	65.1%	61.8%	63.7%
PECO-Gas	40.1%	23.3%	28.4%
Peoples	32.0%	58.9%	51.5%
PGW	42.7%	29.7%	36.2%
UGI Utilities – Gas	5.5%	3.7%	2.5%
Total/Industry Average	35.3%	30.9%	29.2%

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 – 2022

Utility	Residential Gross Write-Offs Ratio	Confirmed Low-Income Gross Write-Offs Ratio
Duquesne	2.4%	5.5%
Met-Ed	2.0%	9.9%
PECO-Electric	1.5%	5.0%
Penelec	2.4%	9.5%
Penn Power	1.7%	9.1%
PPL	2.0%	7.0%
West Penn	1.8%	10.2%
Total/Industry Average	1.9%	7.6%

Gross Write-Offs Ratio – Natural Gas Customers – 2022

Utility	Residential Gross Write-Offs Ratio	Confirmed Low-Income Gross Write-Offs Ratio
Columbia	1.9%	2.2%
NFG	1.8%	9.5%
PECO-Gas	0.4%	2.6%
Peoples	1.6%	4.7%
PGW	6.6%	22.8%
UGI Utilities – Gas	2.8%	1.2%
Total/Industry Average	2.7%	7.1%

Gross Write-Offs Ratio – Residential Electric Customers – 2020-2022

Utility	2020 Gross Write-Offs Ratio	2021 Gross Write-Offs Ratio	2022 Gross Write-Offs Ratio
Duquesne	2.4%	2.7%	2.4%
Met-Ed	1.7%	1.8%	2.0%
PECO-Electric	0.8%	1.5%	1.5%
Penelec	2.0%	2.2%	2.4%
Penn Power	1.3%	1.2%	1.7%
PPL	1.6%	2.2%	2.0%
West Penn	1.6%	1.6%	1.8%
Total/Industry Average	1.5%	1.9%	1.9%

Gross Write-Offs Ratio – Residential Natural Gas Customers – 2020-2022

Utility	2020 Gross Write-Offs Ratio	2021 Gross Write-Offs Ratio	2022 Gross Write-Offs Ratio
Columbia	1.1%	2.3%	1.9%
NFG	3.1%	1.4%	1.8%
PECO-Gas	0.3%	0.5%	0.4%
Peoples	2.5%	1.9%	1.6%
PGW	4.2%	4.1%	6.6%
UGI Utilities – Gas	2.2%	3.1%	2.8%
Total/Industry Average	2.2%	2.4%	2.7%

Gross Write-Offs Ratio – Confirmed Low-Income Electric Customers – 2020-2022

Utility	2020 Gross Write-Offs Ratio	2021 Gross Write-Offs Ratio	2022 Gross Write-Offs Ratio
Duquesne	6.6%	5.5%	5.5%
Met-Ed	8.7%	9.6%	9.9%
PECO-Electric	3.2%	3.3%	5.0%
Penelec	8.1%	8.9%	9.5%
Penn Power	7.5%	6.9%	9.1%
PPL	4.1%	8.3%	7.0%
West Penn	9.2%	9.4%	10.2%
Total/Industry Average	5.7%	7.6%	7.6%

Gross Write-Offs Ratio – Confirmed Low-Income Natural Gas Customers – 2020-2022

Utility	2020 Gross Write-Offs Ratio	2021 Gross Write-Offs Ratio	2022 Gross Write-Offs Ratio
Columbia	3.1%	11.1%	2.2%
NFG	15.4%	7.3%	9.5%
PECO-Gas	3.2%	2.5%	2.6%
Peoples	9.0%	7.0%	4.7%
PGW	8.2%	6.3%	22.8%
UGI Utilities – Gas	1.1%	1.4%	1.2%
Total/Industry Average	6.0%	6.3%	7.1%

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 PUC-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 PUC'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 – 2022

Utility	Residential	Confirmed Low-Income	Percent of Collection Operating Expenses for Confirmed Low-Income Customers
Duquesne*	\$6,032,358	\$903,044	15.0%
Met-Ed	\$17,345,552	\$11,952,760	68.9%
PECO-Electric	\$15,388,527	\$1,593,021	10.4%
Penelec	\$17,283,876	\$12,785,857	74.0%
Penn Power	\$4,394,359	\$3,057,937	69.6%
PPL	\$9,465,381	\$5,016,652	53.0%
West Penn	\$16,640,374	\$11,579,292	69.6%
Total/Industry Average	\$86,550,427	\$46,888,563	54.2%

*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 – 2022

Utility	Residential	Confirmed Low-Income	Percent of Collection Operating Expenses for Confirmed Low-Income Customers
Columbia	\$5,387,188	\$1,399,253	26.0%
NFG	\$856,517	\$205,285	24.0%
PECO-Gas	\$1,901,953	\$115,183	6.1%
Peoples	\$4,690,985	\$844,377	18.0%
PGW	\$854,301	\$201,758	23.6%
UGI Utilities – Gas	\$6,455,365	\$1,860,969	28.8%
Total/Industry Average	\$20,146,309	\$4,626,825	23.0%

Annual Residential Electric Collection Operating Expenses – 2020-2022

Utility	2020	2021	2022
Duquesne	\$5,047,179	\$5,650,501	\$6,032,358
Met-Ed	\$12,916,942	\$14,477,392	\$17,345,552
PECO-Electric	\$11,371,263	\$17,076,690	\$15,388,527
Penelec	\$13,276,426	\$14,575,137	\$17,283,876
Penn Power	\$3,137,598	\$3,072,511	\$4,394,359
PPL	\$9,860,638	\$10,676,233	\$9,465,381
West Penn	\$12,947,688	\$12,841,965	\$16,640,374
Total/Industry Average	\$68,557,734	\$78,370,429	\$86,550,427

Annual Residential Natural Gas Collection Operating Expenses – 2020-2022

Utility	2020	2021	2022
Columbia	\$2,000,716	\$3,087,170	\$5,387,188
NFG	\$488,958	\$715,813	\$856,517
PECO-Gas	\$1,405,437	\$2,110,602	\$1,901,953
Peoples	\$3,240,421	\$5,424,383	\$4,690,985
PGW	\$957,865	\$1,050,275	\$854,301
UGI Utilities – Gas	\$4,599,633	\$8,157,817	\$6,455,365
Total/Industry Average	\$12,693,030	\$20,546,060	\$20,146,309

Annual Confirmed Low-Income Electric Collection Operating Expenses – 2020-2022

Utility	2020	2021	2022
Duquesne*	n/a	\$803,501	\$903,044
Met-Ed	\$9,403,191	\$9,968,040	\$11,952,760
PECO-Electric	\$1,110,220	\$1,726,928	\$1,593,021
Penelec	\$10,200,878	\$10,562,404	\$12,785,857
Penn Power	\$2,316,253	\$2,073,171	\$3,057,937
PPL	\$5,226,138	\$5,658,403	\$5,016,652
West Penn	\$9,383,596	\$8,909,207	\$11,579,292
Total/Industry Average	\$37,640,276	\$39,701,654	\$46,888,563

*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 – 2020-2022

Utility	2020	2021	2022
Columbia	\$616,043	\$1,010,810	\$1,399,253
NFG	\$189,875	\$202,386	\$205,285
PECO-Gas	\$78,357	\$122,401	\$115,183
Peoples	\$602,718	\$867,901	\$844,377
PGW	\$263,173	\$237,128	\$201,758
UGI Utilities – Gas	\$2,212,408	\$2,808,832	\$1,860,969
Total/Industry Average	\$3,962,574	\$5,249,458	\$4,626,825

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 defined³⁴ 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 2022.

Average Household Income and Size

For all 2022 participants in universal service programs, average annual household income for electric customers was \$19,752 and \$17,754 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 – 2020-2022***

Program	2020	2021	2022
LIURP	\$18,204	\$14,211	\$18,555
CAP	\$14,292	\$18,474	\$14,124
CARES	\$18,572	\$18,362	\$20,748
Hardship Fund	\$22,018	\$20,462	\$26,152
Total/Industry Average	\$18,221	\$17,796	\$19,752

***Participants in Universal Service Programs
Average Household Income – Summary for All Natural Gas Customers – 2020-2022***

Program	2020	2021	2022
LIURP	\$18,281	\$18,207	\$18,271
CAP	\$14,251	\$14,551	\$14,898
CARES	\$16,927	\$16,645	\$18,017
Hardship Fund	\$17,805	\$17,308	\$19,831
Total/Industry Average	\$16,816	\$16,678	\$17,754

³⁴ 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. The 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 – 2020-2022

Source of Household Income	2020 LIURP	2021 LIURP	2022 LIURP
Employment	38.8%	35.6%	38.9%
Pension or Retirement	17.5%	18.8%	21.1%
Unemployment Compensation	11.4%	10.1%	7.7%
Disability	15.7%	11.3%	10.2%
Public Assistance	2.0%	2.2%	2.4%
Other	14.4%	22.0%	19.7%

Participants in Universal Service Programs Source of Household Income – Summary for All CAP Electric Customers – 2020-2022

Source of Household Income	2020 CAP	2021 CAP	2022 CAP
Employment	27.1%	25.9%	26.9%
Pension or Retirement	21.5%	21.2%	21.3%
Unemployment Compensation	4.6%	6.1%	4.0%
Disability	21.5%	21.6%	19.6%
Public Assistance	2.7%	2.3%	2.2%
Other	22.6%	22.9%	26.0%

Participants in Universal Service Programs Source of Household Income – Summary for All Hardship Fund Electric Customers – 2020-2022

Source of Household Income	2020 Hardship Fund	2021 Hardship Fund	2022 Hardship Fund
Employment	47.3%	45.4%	54.5%
Pension or Retirement	17.0%	16.7%	16.6%
Unemployment Compensation	9.7%	9.7%	1.8%
Disability	13.8%	14.6%	9.8%
Public Assistance	0.7%	0.6%	1.8%
Other	11.6%	13.0%	15.5%

Participants in Universal Service Programs
Source of Household Income – Summary for All LIURP Natural Gas Customers – 2020-2022

Source of Household Income	2020 LIURP	2021 LIURP	2022 LIURP
Employment	27.6%	25.8%	29.5%
Pension or Retirement	29.2%	31.4%	31.2%
Unemployment Compensation	5.9%	6.7%	4.9%
Disability	14.3%	14.1%	13.8%
Public Assistance	3.2%	2.6%	3.1%
Other	19.8%	19.4%	17.6%

Participants in Universal Service Programs
Source of Household Income – Summary for All CAP Natural Gas Customers – 2020-2022

Source of Household Income	2020 CAP	2021 CAP	2022 CAP
Employment	27.6%	26.5%	28.6%
Pension or Retirement	32.6%	30.9%	31.5%
Unemployment Compensation	4.6%	6.2%	3.7%
Disability	17.7%	17.9%	17.1%
Public Assistance	3.4%	3.3%	3.3%
Other	14.0%	15.1%	15.9%

Participants in Universal Service Programs
Source of Household Income – Summary for All Hardship Fund Natural Gas Customers – 2020-2022

Source of Household Income	2020 Hardship Fund	2021 Hardship Fund	2022 Hardship Fund
Employment	39.1%	38.2%	43.6%
Pension or Retirement	16.4%	14.4%	15.0%
Unemployment Compensation	5.6%	10.3%	1.8%
Disability	18.8%	19.0%	16.6%
Public Assistance	1.9%	1.4%	3.4%
Other	18.2%	17.0%	19.7%

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 2022, minimum wage in Pennsylvania was \$7.25 per hour, the same as it has been since 2009.³⁵ Annual income for an individual wage earner who works at a full time (40hr/week) minimum-wage job is \$15,080, which equates to 111% of FPIG in 2022 and 103% FPIG in 2023. By comparison, the average electric CAP household (two persons) had an income of \$14,124 in 2022, which placed these households’ incomes at approximately 77% of FPIG (for two persons) for 2022 and 72% for 2023. The average natural gas CAP household (two persons) had an income of \$14,898, which placed the household at approximately 81% of FPIG for 2022 and 76% for 2023. See Appendix 3.

Low-Income Usage Reduction Program (LIURP)

LIURP is a statewide, public utility-sponsored, residential usage-reduction program mandated by the PUC.³⁶ 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.³⁷ 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) relative to their income (arrearage as a percent of income). 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 public 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,³⁸ which are subject to PUC approval.

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 contractors 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. 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, air conditioner replacements or efficiency improvements, 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.

³⁵ The Pennsylvania state minimum wage of \$7.25 per hour was enacted on July 24, 2009.

<https://www.dol.gov/agencies/whd/minimum-wage/state#pa>

³⁶ 52 Pa. Code, Chapter 58

³⁷ 52 Pa. Code § 58.10(c)

³⁸ On Oct. 3, 2019, at Docket No. M-2019-3012601, the PUC 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.

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 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 PUC annually, but are estimates based on LIURP budgets approved in USECPs, or modified in base rate proceedings.

NOTE: Due to the COVID-19 pandemic, EDCs and NGDCs suspended LIURP spending and production for several months in 2020. This resulted in a significant increase in carryover funding from into 2021 and 2022 for some public utilities.

LIURP Spending – Electric Utilities – 2022

Utility	2022 Projected Spending*	2022 Actual Spending	2023 Projected Spending*
Duquesne	\$2,841,000	\$2,630,871	\$4,276,129
Met-Ed	\$6,284,233	\$5,996,087	\$6,749,970
PECO-Electric	\$5,589,676	\$5,593,264	\$6,596,412
Penelec	\$8,816,414	\$6,835,496	\$9,239,377
Penn Power	\$4,539,320	\$3,213,204	\$4,590,891
PPL	\$13,630,917	\$12,541,987	\$13,088,930
West Penn	\$7,075,716	\$7,493,636	\$7,096,660
Total/Industry Average	\$48,777,276	\$44,304,545	\$51,638,369

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

LIURP Spending – Natural Gas Utilities – 2021

Utility	2022 Projected Spending*	2022 Actual Spending	2023 Projected Spending*
Columbia	\$8,932,244	\$6,476,224	\$5,893,673
NFG	\$2,936,096	\$847,500	\$3,388,596
PECO-Gas	\$2,249,987	\$2,249,987	\$3,150,000
Peoples	\$4,341,372	\$3,624,931	\$3,466,437
PGW	\$7,988,818	\$7,872,502	\$8,105,134
UGI Utilities – Gas	\$3,714,350	\$4,121,651	\$3,964,350
Total/Industry Average	\$30,162,867	\$25,192,795	\$27,968,190

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

LIURP Production

LIURP production (jobs completed) levels are influenced by many factors including the size of the public utility's LIURP program budget, housing-stock characteristics such as the type, size and condition, contractor capability, contractor capacity, and to a lesser extent, 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 water-heating 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.

LIURP Electric Production – 2021-2023

Utility	2021 Actual Production			2022 Actual Production			2023 Projected Production		
	Heating Jobs	Water Heating Jobs	Baseload Jobs	Heating Jobs	Water Heating Jobs	Baseload Jobs	Heating Jobs	Water Heating Jobs	Baseload Jobs
Duquesne	251	6	2,362	23	2	3,100	310	5	2,785
Met-Ed	555	450	267	344	335	259	407	358	255
PECO-Electric	499	0	1,542	321	0	2,331	513	0	3,832
Penelec	346	1,073	542	251	922	524	380	1,135	588
Penn Power	134	234	328	133	217	263	193	267	335
PPL	2,278	829	1,277	1,780	546	1,282	1,760	550	1,300
West Penn	346	608	249	244	463	256	297	494	229
Total/Industry Average	4,409	3,200	6,567	3,096	2,485	8,015	3,860	2,809	9,324

LIURP Natural Gas Production – 2021-2023

Utility	2021 Actual Production Heating Jobs	2022 Actual Production Heating Jobs	2023 Projected Production Heating Jobs
Columbia	307	440	454
NFG	93*	78	486
PECO-Gas	309	352	441
Peoples	238	312	298
PGW	2,060	1,894	1,878
UGI Utilities – Gas	378	570	471
Total/Industry Average	3,386	3,646	4,028

*NFG submitted corrected LIURP production numbers for 2021.

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.

LIURP Electric Average Heating Job Costs – 2020-2022

Utility	2020 Heating Jobs	2021 Heating Jobs	2022 Heating Jobs
Duquesne*	\$1,400	\$867	\$2,885
Met-Ed	\$4,224	\$4,301	\$6,771
PECO-Electric	\$3,739	\$3,974	\$9,659
Penelec	\$4,021	\$3,523	\$4,619
Penn Power	\$6,716	\$6,059	\$7,672
PPL	\$4,461	\$4,072	\$5,101
West Penn	\$5,095	\$6,058	\$9,329

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

LIURP Electric Average Water Heating Job Costs – 2020-2022

Utility	2020 Water Heating Jobs	2021 Water Heating Jobs	2022 Water Heating Jobs
Duquesne	\$3,824	\$2,754	\$4,188
Met-Ed	\$2,747	\$3,155	\$4,206
PECO-Electric	\$0	\$0	\$0
Penelec	\$2,409	\$2,246	\$2,911
Penn Power	\$2,215	\$3,210	\$3,307
PPL	\$1,618	\$1,881	\$2,890
West Penn	\$4,021	\$4,447	\$5,806

LIURP Electric Average Baseload Job Costs – 2020-2022

Utility	2020 Baseload Jobs	2021 Baseload Jobs	2022 Baseload Jobs
Duquesne*	\$869	\$861	\$825
Met-Ed	\$2,523	\$2,988	\$4,015
PECO-Electric	\$750	\$1,955	\$818
Penelec	\$1,990	\$1,894	\$2,241
Penn Power	\$1,823	\$2,358	\$2,797
PPL	\$1,036	\$1,120	\$1,078
West Penn	\$3,207	\$3,776	\$3,948

*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.

LIURP Natural Gas Average Job Cost – 2020-2022

Utility	2020 Heating Jobs	2021 Heating Jobs	2022 Heating Jobs
Columbia	\$7,207	\$6,216	\$13,030
NFG	\$5,624	\$5,832*	\$5,409
PECO-Gas	\$3,037	\$7,256	\$6,374
Peoples	\$8,174	\$7,978	\$10,802
PGW	\$3,039	\$3,485	\$3,208
UGI Utilities – Gas	\$6,440	\$6,739	\$6,836

*NFG reported corrected data for 2021.

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 2018-2020 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: 2020 program year was evaluated in 2021 (post period) and reported to the PUC in 2022.

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.

LIURP Estimated Energy Savings – 2018-2020 Program Years

Job Type	2018 Estimated Energy Savings	2019 Estimated Energy Savings	2020 Estimated Energy Savings
Electric Heating	8.1%	7.6%	6.7%
Electric Water Heating	6.6%	10.7%	8.2%
Electric Baseload	5.6%	7.3%	4.3%
Gas Heating	16.6%	15.2%	14.5%

LIURP Estimated Annual Bill Savings – 2018-2020 Program Years

Job Type	2018 Estimated Annual Bill Reduction	2019 Estimated Annual Bill Reduction	2020 Estimated Annual Bill Reduction
Electric Heating	\$198	\$194	\$167
Electric Water Heating	\$122	\$200	\$146
Electric Baseload	\$84	\$114	\$71
Gas Heating	\$304	\$249	\$220

Customer Assistance Programs (CAPs)

The PUC monitors implementation of universal service programs 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 PUC 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 PUC approval and a third-party evaluation of its universal service programs. USECPs and Evaluations are posted on the PUC's website (Appendix 4 contains viewing instructions).

CAP Participation Rate

The **CAP participation rate** is a “snapshot” of CAP participation based on customers enrolled in CAP as of Dec. 31, 2022, divided by the number of confirmed low-income customers served by the EDC or NGDC. The PUC 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.

The **Monthly Average CAP Participation** reflects the average number of customers enrolled in a public utility’s CAP. As CAP enrollments may fluctuate during heating and non-heating months, the average number of CAP customers can provide a more accurate count of customers who participated in CAP during a calendar year. The **Monthly Average CAP Participation by Poverty Level** reflects the FPIG level (*i.e.*, 0-50%, 51-100%, 101-150%) for average CAP customers, based on their household income.

CAP Participation – Electric Utilities – 2020-2022

Utility	2020		2021		2022	
	Participants Enrolled as of 12/31/20	CAP Participant Rate	Participants Enrolled as of 12/31/21	CAP Participant Rate	Participants Enrolled as of 12/31/22	CAP Participant Rate
Duquesne	33,638	70.6%	35,229	73.2%	38,092	74.5%
Met-Ed	19,310	26.4%	21,280	36.7%	21,325	36.7%
PECO-Electric	114,735	84.6%	121,408	86.1%	121,487	83.7%
Penelec	25,345	28.1%	28,463	39.1%	28,988	39.8%
Penn Power	5,546	27.9%	6,281	38.9%	6,835	41.9%
PPL	65,862	34.0%	64,673	32.9%	68,949	34.6%
West Penn	22,591	30.0%	24,792	39.3%	25,124	39.8%
Total/Industry Average	287,027	45.2%	302,126	50.7%	310,800	51.3%

CAP Participation – Natural Gas Utilities – 2020-2022

Utility	2020		2021		2022	
	Participants Enrolled as of 12/31/20	CAP Participant Rate	Participants Enrolled as of 12/31/21	CAP Participant Rate	Participants Enrolled as of 12/31/22	CAP Participant Rate
Columbia	23,542	34.6%	24,459	35.9%	23,982	34.2%
NFG	7,793	22.1%	7,201	25.7%	6,793	29.0%
PECO-Gas	20,188	77.0%	21,776	79.2%	22,334	77.1%
Peoples	31,202	28.7%	32,421	29.9%	28,367	26.3%
PGW	55,497	41.5%	53,466	48.4%	50,385	43.8%
UGI Utilities – Gas	24,236	31.3%	22,493	28.7%	19,914	23.4%
Total/Industry Average	162,458	36.1%	161,816	38.4%	151,775	35.2%

Monthly Average Electric CAP Participation – 2020-2022

Utility	2020	2021	2022
Duquesne	35,853	34,129	37,277
Met-Ed	16,186	20,441	22,111
PECO-Electric	113,536	118,393	119,149
Penelec	21,635	27,069	29,576
Penn Power	4,750	5,950	6,514
PPL	63,336	66,178	67,491
West Penn	19,090	23,853	25,700
Total/Industry Average	274,385	296,013	307,818

Monthly Average Natural Gas CAP Participation – 2020-2022

Utility	2020	2021	2022
Columbia	23,279	24,122	24,917
NFG	7,660	7,544	6,818
PECO-Gas	19,908	21,079	21,807
Peoples	28,892	32,126	29,760
PGW	54,646	59,139	51,883
UGI Utilities – Gas	23,860	23,264	19,976
Total/Industry Average	158,243	167,273	155,162

Monthly Average Electric CAP Participation by Poverty Level – 2020-2022

Utility	2020			2021			2022		
	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	7,360	17,778	10,715	7,366	16,388	10,375	9,583	17,393	10,301
Met-Ed	4,460	6,884	4,842	6,524	8,249	5,668	7,898	8,460	5,753
PECO-Electric	26,561	55,091	31,884	29,857	56,202	32,334	33,478	54,015	31,656
Penelec	4,559	10,216	6,860	6,735	12,294	8,040	8,436	12,964	8,176
Penn Power	1,022	2,134	1,594	1,503	2,581	1,866	1,989	2,752	1,773
PPL	12,418	27,890	23,028	12,538	28,173	25,467	15,386	28,988	23,117
West Penn	4,596	8,590	5,904	6,681	10,268	6,905	8,080	10,696	6,925
Total/Industry Average	60,976	128,583	84,826	71,205	134,154	90,655	84,849	135,268	87,700

Monthly Average Natural Gas CAP Participation by Poverty Level – 2020-2022

Utility	2020			2021			2022		
	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	5,397	10,385	7,497	6,603	10,215	7,304	7,564	10,420	6,934
NFG	958	3,850	2,852	930	3,777	2,838	858	3,393	2,568
PECO-Gas	4,837	8,434	6,637	5,587	8,691	6,802	6,503	8,525	6,779
Peoples	7,704	12,684	8,504	9,340	13,602	9,184	9,549	11,995	8,217
PGW	11,879	29,735	13,031	14,123	31,093	13,923	12,926	26,871	12,086
UGI Utilities – Gas	6,293	11,366	6,201	6,159	10,357	6,747	5,403	8,318	6,255
Total/Industry Average	37,068	76,454	44,722	42,742	77,734	46,797	42,802	69,522	42,837

Monthly Average Percent Electric CAP Participation by Poverty Level – 2020-2022

Utility	2020			2021			2022		
	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	20.5%	49.6%	29.9%	21.6%	48.0%	30.4%	25.7%	46.7%	27.6%
Met-Ed	27.6%	42.5%	29.9%	31.9%	40.4%	27.7%	35.7%	38.3%	26.0%
PECO-Electric	23.4%	48.5%	28.1%	25.2%	47.5%	27.3%	28.1%	45.3%	26.6%
Penelec	21.1%	47.2%	31.7%	24.9%	45.4%	29.7%	28.5%	43.8%	27.6%
Penn Power	21.5%	44.9%	33.6%	25.3%	43.4%	31.4%	30.5%	42.2%	27.2%
PPL	17.0%	45.5%	37.5%	18.9%	42.6%	38.5%	22.8%	43.0%	34.3%
West Penn	24.1%	45.0%	30.9%	28.0%	43.0%	28.9%	31.4%	41.6%	26.9%
Total/Industry Average	21.7%	47.2%	31.1%	24.1%	45.3%	30.6%	27.6%	43.9%	28.5%

Monthly Average Percent Natural Gas CAP Participation by Poverty Level – 2020-2022

Utility	2020			2021			2022		
	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	23.2%	44.6%	32.2%	27.4%	42.3%	30.3%	30.4%	41.8%	27.8%
NFG	12.5%	50.3%	37.2%	12.3%	50.1%	37.6%	12.6%	49.8%	37.7%
PECO-Gas	24.3%	42.4%	33.3%	26.5%	41.2%	32.3%	29.8%	39.1%	31.1%
Peoples	26.7%	43.9%	29.4%	29.1%	42.3%	28.6%	32.1%	40.3%	27.6%
PGW	21.7%	54.4%	23.8%	23.9%	52.6%	23.5%	24.9%	51.8%	23.3%
UGI Utilities – Gas	26.4%	47.6%	26.0%	26.5%	44.5%	29.0%	27.0%	41.6%	31.3%
Total/Industry Average	23.4%	48.3%	28.3%	25.6%	46.5%	28.0%	27.6%	44.8%	27.6%

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 occurrences 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.³⁹ This contributed to reduced CAP default rates in 2020 and 2021.

Annual Electric CAP Default Rate by Poverty Level – 2020-2022

Utility	2020			2021			2022		
	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	28.8%	20.2%	18.0%	40.4%	21.9%	20.3%	44.3%	11.7%	36.9%
Met-Ed	5.3%	7.7%	12.3%	8.8%	10.6%	15.4%	14.6%	13.7%	15.3%
PECO-Electric	13.8%	8.7%	11.5%	12.6%	8.5%	11.9%	18.9%	14.7%	19.8%
Penelec	4.1%	3.9%	7.9%	10.0%	9.2%	12.7%	14.2%	11.1%	12.3%
Penn Power	5.2%	4.8%	8.3%	10.0%	8.6%	12.9%	5.8%	4.6%	6.8%
PPL	11.4%	9.0%	10.3%	24.6%	22.6%	23.0%	17.3%	18.5%	22.3%
West Penn	4.7%	6.0%	9.4%	10.3%	11.6%	16.6%	13.4%	11.0%	12.7%
Total/Industry Average	12.9%	9.7%	11.5%	16.7%	13.5%	16.6%	19.8%	14.2%	20.7%

Annual Natural Gas CAP Default Rate by Poverty Level – 2020-2022

Utility	2020			2021			2022		
	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	2.0%	2.2%	3.2%	4.9%	3.3%	3.5%	13.6%	11.5%	12.7%
NFG	2.2%	2.2%	2.3%	9.9%	9.8%	9.8%	10.0%	10.1%	10.1%
PECO-Gas	13.6%	9.6%	11.8%	12.0%	10.1%	11.6%	16.2%	13.8%	19.0%
Peoples	8.6%	7.2%	18.3%	0.3%	0.3%	0.6%	27.6%	24.1%	24.4%
PGW	4.9%	3.6%	4.1%	13.6%	12.2%	6.9%	33.7%	22.6%	14.8%
UGI Utilities – Gas	17.8%	15.4%	23.4%	40.0%	35.7%	36.7%	55.2%	47.1%	37.4%
Total/Industry Average	8.5%	6.3%	10.3%	12.9%	11.7%	10.3%	28.4%	22.4%	20.0%

³⁹ Duquesne resumed its CAP recertification procedures and requirements on June 18, 2020.

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 PUC 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 **arrears 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.

Average Monthly Electric CAP Bill – 2020-2022

Utility	2020	2021	2022
Duquesne	\$53	\$57	\$55
Met-Ed	\$69	\$67	\$81
PECO-Electric	\$68	\$70	\$71
Penelec	\$58	\$56	\$66
Penn Power	\$57	\$57	\$72
PPL	\$85	\$86	\$90
West Penn	\$60	\$53	\$66
Total/Industry Average	\$69	\$69	\$73

Average Monthly Natural Gas CAP Bill – 2020-2022

Utility	2020	2021	2022
Columbia	\$51	\$53	\$57
NFG	\$48	\$52	\$64
PECO-Gas	\$52	\$52	\$65
Peoples	\$73	\$74	\$74
PGW	\$78	\$59	\$61
UGI Utilities – Gas	\$68	\$67	\$68
Total/Industry Average	\$67	\$61	\$65

Average Annual Electric CAP Credits – 2020-2022

Utility	2020	2021	2022
Duquesne	\$625	\$798	\$861
Met-Ed	\$879	\$895	\$1,016
PECO-Electric	\$491	\$525	\$722
Penelec	\$803	\$806	\$888
Penn Power	\$841	\$878	\$999
PPL	\$883	\$905	\$1,237
West Penn	\$812	\$691	\$852
Total/Industry Average	\$675	\$713	\$906

Average Annual Natural Gas CAP Credits – 2020-2022

Utility	2020	2021	2022
Columbia	\$628	\$830	\$1,157
NFG	\$163	\$188	\$282
PECO-Gas	\$113	\$97	\$242
Peoples	\$225	\$290	\$553
PGW	\$634	\$870	\$1,189
UGI Utilities – Gas	\$274	\$288	\$530
Total/Industry Average	\$416	\$544	\$804

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 – 2020-2022

Utility	2020	2021	2022
Duquesne	\$109	\$227	\$195
Met-Ed	\$97	\$121	\$115
PECO-Electric	\$31	\$55	\$78
Penelec	\$72	\$91	\$88
Penn Power	\$77	\$102	\$98
PPL	\$295	\$344	\$371
West Penn	\$108	\$127	\$115
Total/Industry Average	\$115	\$154	\$164

Average Annual Natural Gas Utilities Arrearage Forgiveness – 2020-2022

Utility	2020	2021	2022
Columbia	\$45	\$136	\$150
NFG	\$61	\$67	\$40
PECO-Gas	\$16	\$17	\$24
Peoples	\$107	\$154	\$129
PGW	\$189	\$230	\$220
UGI Utilities – Gas	\$110	\$125	\$125
Total/Industry Average	\$113	\$154	\$143

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.).

Percentage of CAP Dollars Paid by Electric CAP Customers – 2020-2022

Utility	2020	2021	2022
Duquesne	72.4%	76.6%	98.2%
Met-Ed	79.7%	116.7%	78.9%
PECO-Electric	77.0%	85.3%	87.0%
Penelec	81.7%	118.6%	79.5%
Penn Power	83.1%	116.0%	83.2%
PPL	95.9%	91.6%	93.1%
West Penn	83.1%	120.0%	79.9%
Total/Industry Average	82.9%	93.0%	87.8%

Percentage of CAP Dollars Paid by Natural Gas CAP Customers – 2020-2022

Utility	2020	2021	2022
Columbia	70.4%	76.8%	62.7%
NFG	65.2%	60.6%	39.5%
PECO-Gas	77.0%	88.0%	87.0%
Peoples	84.1%	91.5%	75.7%
PGW	72.9%	50.3%	53.1%
UGI Utilities – Gas	88.5%	97.7%	44.9%
Total/Industry Average	77.4%	75.1%	62.6%

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.

CAP Payment Rate Electric CAP Customers – 2020-2022

Utility	2020	2021	2022
Duquesne	47.3%	54.4%	40.7%
Met-Ed	54.5%	69.7%	50.4%
PECO-Electric	58.7%	68.4%	53.4%
Penelec	62.3%	75.9%	58.7%
Penn Power	63.6%	71.4%	63.2%
PPL	60.7%	55.3%	45.0%
West Penn	58.1%	78.5%	57.1%
Total/Industry Average	57.7%	65.2%	50.8%

CAP Payment Rate Natural Gas CAP Customers – 2020-2022

Utility	2020	2021	2022
Columbia	51.5%	52.5%	44.7%
NFG	72.1%	71.5%	64.9%
PECO-Gas	56.4%	70.2%	53.8%
Peoples	47.4%	53.1%	49.0%
PGW	50.6%	58.2%	64.0%
UGI Utilities – Gas	87.8%	89.6%	92.0%
Total/Industry Average	57.4%	62.8%	60.1%

CAP Costs

The USRR requires EDCs and NGDCs to report data on the three components of **CAP costs**: CAP administration, 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 reductions in traditional collection expenses, cash-working-capital expenses and bad debt expenses that may result from enrolling low-income customers in CAP. Appendices 5-7 show total universal service costs, universal service funding mechanisms and average annual CAP and universal service costs per ratepayer.

Electric Total CAP Spending by CAP Component – CAP Administrative Costs – 2020-2022

Utility	2020		2021		2022	
	Administrative Costs	Percent of Total Spending	Administrative Costs	Percent of Total Spending	Administrative Costs	Percent of Total Spending
Duquesne	\$1,932,360	6.8%	\$1,837,474	5.0%	\$1,831,519	4.4%
Met-Ed	\$1,484,494	8.6%	\$1,601,892	7.2%	\$1,608,582	6.0%
PECO-Electric	\$2,671,866	4.3%	\$2,875,667	4.0%	\$2,903,138	3.0%
Penelec	\$1,658,192	8.1%	\$1,913,851	7.3%	\$1,987,290	6.4%
Penn Power	\$436,515	9.1%	\$495,198	7.8%	\$492,919	6.5%
PPL	\$2,971,587	3.8%	\$2,889,621	3.4%	\$3,702,668	3.3%
West Penn	\$1,633,675	8.5%	\$1,784,118	8.4%	\$1,672,737	6.3%
Total/Industry Average	\$12,788,689	5.6%	\$13,397,821	5.0%	\$14,198,853	4.1%

Electric Total CAP Spending by CAP Component – CAP Credits – 2020-2022

Utility	2020		2021		2022	
	CAP Credit Costs	Percent of Total Spending	CAP Credit Costs	Percent of Total Spending	CAP Credit Costs	Percent of Total Spending
Duquesne	\$22,405,031	79.4%	\$27,227,252	74.0%	\$32,099,612	77.9%
Met-Ed	\$14,226,455	82.4%	\$18,291,791	81.8%	\$22,455,630	84.4%
PECO-Electric	\$55,780,710	90.1%	\$62,209,810	86.9%	\$86,031,718	87.6%
Penelec	\$17,373,847	84.4%	\$21,816,555	83.3%	\$26,275,990	85.1%
Penn Power	\$3,997,054	83.3%	\$5,226,516	82.6%	\$6,507,795	85.2%
PPL	\$55,915,901	72.1%	\$59,865,948	70.0%	\$83,472,178	74.4%
West Penn	\$15,505,565	80.8%	\$16,472,954	77.4%	\$21,888,097	82.6%
Total/Industry Average	\$185,204,563	80.7%	\$211,110,826	78.2%	\$278,731,020	81.2%

Electric Total CAP Spending by CAP Component – CAP Arrearage Forgiveness – 2020-2022

Utility	2020		2021		2022	
	Arrearage Forgiveness Costs	Percent of Total Spending	Arrearage Forgiveness Costs	Percent of Total Spending	Arrearage Forgiveness Costs	Percent of Total Spending
Duquesne	\$3,890,620	13.8%	\$7,737,458	21.0%	\$7,257,819	17.6%
Met-Ed	\$1,564,295	9.1%	\$2,467,132	11.0%	\$2,553,683	9.6%
PECO-Electric	\$3,484,467	5.6%	\$6,461,827	9.0%	\$9,314,007	9.5%
Penelec	\$1,559,447	7.6%	\$2,461,977	9.4%	\$2,598,243	8.4%
Penn Power	\$366,390	7.6%	\$605,637	9.6%	\$640,717	8.4%
PPL	\$18,656,480	24.1%	\$22,775,341	26.6%	\$25,033,037	22.3%
West Penn	\$2,054,539	10.7%	\$3,022,512	14.2%	\$2,947,123	11.1%
Total/Industry Average	\$31,576,238	13.8%	\$45,531,884	16.9%	\$50,344,629	14.7%

Natural Gas Total CAP Spending by CAP Component – CAP Administrative Costs – 2020-2022

Utility	2020		2021		2022	
	Administrative Costs	Percent of Total Spending	Administrative Costs	Percent of Total Spending	Administrative Costs	Percent of Total Spending
Columbia	\$726,617	4.4%	\$751,262	3.1%	\$763,645	2.3%
NFG	\$270,288	13.6%	\$218,475	10.2%	\$212,583	8.8%
PECO-Gas	\$434,955	14.4%	\$479,278	16.6%	\$512,319	8.1%
Peoples	\$1,124,679	10.5%	\$1,143,373	7.4%	\$1,160,300	5.4%
PGW	\$1,069,750	2.3%	\$982,999	1.5%	\$1,153,332	1.6%
UGI Utilities – Gas	\$544,049	5.6%	\$644,932	6.2%	\$651,626	4.7%
Total/Industry Average	\$4,170,338	4.7%	\$4,220,319	3.5%	\$4,453,805	2.9%

Natural Gas Total CAP Spending by CAP Component – CAP Credits – 2020-2022

Utility	2020		2021		2022	
	CAP Credit Costs	Percent of Total Spending	CAP Credit Costs	Percent of Total Spending	CAP Credit Costs	Percent of Total Spending
Columbia	\$14,619,229	89.1%	\$20,023,299	83.2%	\$28,818,215	86.5%
NFG	\$1,252,107	63.0%	\$1,415,748	66.1%	\$1,923,734	79.8%
PECO-Gas	\$2,253,981	74.7%	\$2,037,867	70.7%	\$5,269,516	83.5%
Peoples	\$6,500,626	60.7%	\$9,330,496	60.6%	\$16,465,036	76.7%
PGW	\$34,664,939	75.3%	\$51,479,499	77.9%	\$61,666,524	83.1%
UGI Utilities – Gas	\$6,548,372	67.3%	\$6,711,495	64.9%	\$10,590,732	77.1%
Total/Industry Average	\$65,839,254	74.9%	\$90,998,404	75.3%	\$124,733,757	82.4%

Natural Gas Total CAP Spending by CAP Component – CAP Arrearage Forgiveness – 2020-2022

Utility	2020		2021		2022	
	Arrearage Forgiveness Costs	Percent of Total Spending	Arrearage Forgiveness Costs	Percent of Total Spending	Arrearage Forgiveness Costs	Percent of Total Spending
Columbia	\$1,054,724	6.4%	\$3,284,454	13.7%	\$3,730,576	11.2%
NFG	\$466,566	23.5%	\$508,385	23.7%	\$274,255	11.4%
PECO-Gas	\$327,838	10.9%	\$366,692	12.7%	\$531,765	8.4%
Peoples	\$3,085,811	28.8%	\$4,934,034	32.0%	\$3,833,745	17.9%
PGW	\$10,315,590	22.4%	\$13,629,103	20.6%	\$11,388,842	15.3%
UGI Utilities – Gas	\$2,631,434	27.1%	\$2,979,130	28.8%	\$2,499,117	18.2%
Total/Industry Average	\$17,881,963	20.3%	\$25,701,798	21.3%	\$22,258,300	14.7%

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.

Electric CAP Costs – 2020-2022

Utility	Total CAP Costs			Average Program Costs per CAP Customer		
	2020	2021	2022	2020	2021	2022
Duquesne	\$28,228,011	\$36,802,184	\$41,188,950	\$787	\$1,078	\$1,105
Met-Ed	\$17,275,244	\$22,360,815	\$26,617,895	\$1,067	\$1,094	\$1,204
PECO- Electric	\$61,937,043	\$71,547,304	\$98,248,863	\$546	\$604	\$825
Penelec	\$20,591,486	\$26,192,383	\$30,861,523	\$952	\$968	\$1,043
Penn Power	\$4,799,959	\$6,327,351	\$7,641,431	\$1,010	\$1,063	\$1,173
PPL	\$77,543,968	\$85,530,910	\$112,207,883	\$1,224	\$1,292	\$1,663
West Penn	\$19,193,779	\$21,279,584	\$26,507,957	\$1,005	\$892	\$1,031
Total/Industry Average	\$229,569,490	\$270,040,531	\$343,274,502	\$837	\$912	\$1,115

Natural Gas CAP Costs – 2020-2022

Utility	Total CAP Costs			Average Program Costs per CAP Customer		
	2020	2021	2022	2020	2021	2022
Columbia	\$16,400,570	\$24,059,015	\$33,312,436	\$705	\$997	\$1,337
NFG	\$1,988,961	\$2,142,608	\$2,410,572	\$260	\$284	\$354
PECO-Gas	\$3,016,774	\$2,883,837	\$6,313,600	\$152	\$137	\$290
Peoples	\$10,711,116	\$15,407,903	\$21,459,081	\$371	\$480	\$721
PGW	\$46,050,279	\$66,091,601	\$74,208,698	\$843	\$1,118	\$1,430
UGI Utilities – Gas	\$9,723,855	\$10,335,557	\$13,741,475	\$408	\$444	\$688
Total/Industry Average	\$87,891,555	\$120,920,521	\$151,445,862	\$555	\$723	\$976

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.⁴⁰ 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. As noted previously, additional temporary funding for LIHEAP was made available through the *American Rescue Plan Act of 2021*. This significantly increased the amount of LIHEAP Cash and Crisis grants available to low-income customers during the 2021-2022 LIHEAP season.

⁴⁰ 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.

Electric CARES-LIHEAP – 2020-2022

Utility	Low-Income Households who Received LIHEAP Cash Grants			Low-Income Households who Received LIHEAP Crisis Grants			Total LIHEAP Grants for Low-Income Customers*		
	2020	2021	2022	2020	2021	2022	2020	2021	2022
Duquesne	6,984	5,628	9,238	3,179	1,873	4,541	\$3,031,673	\$3,079,935	\$7,318,616
Met-Ed	7,388	7,008	9,024	2,679	1,525	1,944	\$3,290,821	\$3,632,999	\$7,718,122
PECO-Electric	31,159	33,893	37,869	15,571	29,182	47,966	\$14,962,585	\$19,450,859	\$38,871,394
Penelec	9,885	9,968	13,394	4,250	2,590	4,114	\$4,881,020	\$5,577,973	\$11,630,564
Penn Power	2,328	2,346	3,374	1,228	653	1,137	\$1,275,578	\$1,343,963	\$3,030,445
PPL	21,935	42,115	51,931	7,128	4,862	4,633	\$8,383,363	\$13,812,910	\$25,150,932
West Penn	11,586	11,204	13,745	4,552	2,539	3,516	\$5,582,321	\$6,063,007	\$11,991,693
Total	91,265	112,162	138,575	38,587	43,224	67,851	\$41,407,361	\$52,961,646	\$105,711,766

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

Natural Gas CARES-LIHEAP – 2020-2022

Utility	Low-Income Households who Received LIHEAP Cash Grants			Low-Income Households who Received LIHEAP Crisis Grants			Total LIHEAP Grants for Low-Income Customers*		
	2020	2021	2022	2020	2021	2022	2020	2021	2022
Columbia	16,496	15,461	17,810	4,222	2,318	2,953	\$5,738,416	\$5,161,194	\$15,698,699
NFG	14,583	13,699	14,614	2,764	3,404	2,956	\$4,694,799	\$7,358,404	\$12,672,428
PECO-Gas	5,072	5,518	13,104	2,535	4,750	8,465	\$2,435,769	\$3,166,419	\$8,464,883
Peoples	25,529	49,010	53,484	9,932	5,248	4,718	\$9,719,267	\$17,759,396	\$24,868,716
PGW	41,055	53,431	82,780	21,784	12,478	7,822	\$22,356,499	\$40,503,514	\$34,297,923
UGI Utilities – Gas	23,144	21,459	46,828	668	2,965	2,216	\$8,565,518	\$10,596,278	\$20,996,759
Total	125,879	158,578	228,620	41,905	31,163	29,130	\$53,510,268	\$84,545,205	\$116,999,408

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

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.*, natural gas, oil) or their electric utility. Therefore, this participation rate may undercount the actual number of confirmed low-income customers that participated in LIHEAP.

Estimated Electric LIHEAP Participation Rate – 2020-2022

Utility	2020	2021	2022
Duquesne	14.7%	11.7%	18.1%
Met-Ed	10.1%	12.1%	15.5%
PECO-Electric	23.0%	24.0%	26.1%
Penelec	11.0%	13.7%	18.4%
Penn Power	11.7%	14.5%	20.7%
PPL	11.3%	21.4%	26.0%
West Penn	15.4%	17.8%	21.8%
Total/Industry Average	14.4%	18.8%	22.9%

Estimated Natural Gas LIHEAP Participation Rate – 2020-2022

Utility	2020	2021	2022
Columbia	24.2%	22.7%	25.4%
NFG	41.4%	48.9%	62.3%
PECO-Gas	19.3%	20.1%	45.2%
Peoples	23.5%	45.2%	49.5%
PGW	30.7%	48.4%	71.9%
UGI Utilities – Gas	29.8%	27.4%	55.1%
Total/Industry Average	28.0%	37.7%	53.1%

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.⁴¹ 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.

Electric CARES Administrative Costs – 2020-2022

Utility	2020	2021	2022
Duquesne	\$135,000	\$135,000	\$135,833
Met-Ed	\$1,647	\$168*	\$773
PECO-Electric	\$1,060,017	\$839,178	\$870,477
Penelec	\$1,135	\$323*	\$1,662
Penn Power	\$1,030	\$180*	\$566
PPL	\$58,326	\$120,463	\$119,892
West Penn	\$2,674	\$168*	\$636
Total/Industry Average	\$1,259,829	\$1,095,480	\$1,129,839

*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 – 2020-2022

Utility	2020	2021	2022
Columbia	\$366,306	\$323,436	\$427,539
NFG	\$4,908	\$4,240	\$4,587
PECO-Gas	\$172,561	\$136,610	\$153,614
Peoples	\$197,515	\$232,034	\$291,255
PGW	\$550,853	\$579,379	\$446,558
UGI Utilities – Gas	\$134,300	\$57,076	\$52,298
Total/Industry Average	\$1,426,443	\$1,332,775	\$1,375,851

⁴¹ 52 Pa. Code §§ 54.72 and 62.2.

Electric CARES Benefits – 2022

Utility	LIHEAP for CARES Participants	Direct Dollars in Addition to LIHEAP for CARES Participants	Total CARES Benefits (Includes LIHEAP)
Duquesne	\$180,787	\$89,620	\$270,407
Met-Ed	\$73,224	\$2,649	\$75,873
PECO-Electric*	\$38,871,394	\$108,177	\$38,979,571
Penelec	\$109,309	\$1,808	\$111,117
Penn Power	\$27,091	\$0	\$27,091
PPL	\$2,150	\$97,850	\$100,000
West Penn	\$118,764	\$2,309	\$121,073
Total/Industry Average	\$39,382,719	\$302,413	\$39,685,132

*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 – 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

*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 – 2022

Utility	LIHEAP for CARES Participants	Direct Dollars in Addition to LIHEAP for CARES Participants	Total CARES Benefits (Includes LIHEAP)
Columbia	\$3,995	\$26,972	\$30,967
NFG	\$6,517	\$0	\$6,517
PECO-Gas*	\$6,859,658	\$19,090	\$6,878,748
Peoples	\$104,580	\$15,867	\$120,447
PGW	\$4,037,348	\$724,275	\$4,761,623
UGI Utilities – Gas	\$522,868	\$842,090	\$1,364,958
Total/Industry Average	\$11,534,966	\$1,628,294	\$13,163,260

*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.

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 available 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 PUC’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 voluntary and public utility contributions to hardship funds. Shareholders contribute a large portion of public utility contributions. Voluntary contributions come primarily from residential customers. The PUC 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. It may also not reflect contributions received before or after the Hardship Fund program year. This may result in the Total Benefits Disbursed exceeding the Total Contributions.

Electric Hardship Fund Voluntary Contributions – 2021-2022

Utility	Voluntary Contributions	Residential Customers	Average Voluntary Contribution per Residential Customer
Duquesne	\$227,750	545,564	\$0.42
Met-Ed	\$114,531	515,226	\$0.22
PECO-Electric	\$84,590	1,521,223	\$0.06
Penelec	\$70,717	501,008	\$0.14
Penn Power	\$35,177	148,927	\$0.24
PPL	\$416,705	1,256,135	\$0.33
West Penn	\$130,119	631,990	\$0.21
Total/Industry Average	\$1,079,589	5,120,072	\$0.21

Natural Gas Hardship Fund Voluntary Contributions – 2021-2022

Utility	Voluntary Contributions	Residential Customers	Average Voluntary Contribution per Residential Customer
Columbia	\$360,238	409,611	\$0.88
NFG	\$51,212	196,741	\$0.26
PECO-Gas	\$14,928	500,154	\$0.03
Peoples	\$226,394	594,250	\$0.38
PGW	\$473	487,336	<\$0.01
UGI Utilities – Gas	\$104,755	618,589	\$0.17
Total/Industry Average	\$758,000	2,806,681	\$0.27

All Electric Hardship Fund Contributions – 2021-2022

Utility	Voluntary Contributions	Public Utility & Shareholder Contributions	Special Contributions	Total Contributions
Duquesne	\$227,750	\$1,375,000	n/a	\$1,602,750
Met-Ed	\$114,531	\$114,531	n/a	\$229,062
PECO-Electric*	\$84,590	\$3,185,605	\$40,243	\$3,310,438
Penelec	\$70,717	\$70,717	n/a	\$141,434
Penn Power	\$35,177	\$35,120	n/a	\$70,297
PPL	\$416,705	\$713,806	\$575,000	\$1,705,511
West Penn	\$130,119	\$107,010	n/a	\$237,129
Total/Industry Average	\$1,079,589	\$5,601,789	\$887,746	\$7,296,621

*In 2022, PECO issued approximately \$3.7 million in additional one-time grants to eligible electric and natural gas customers in debt using unspent LIURP funds from 2020. See Docket No. P-2022-3032265.

All Natural Gas Hardship Fund Contributions – 2021-2022

Utility	Voluntary Contributions	Public Utility & Shareholder Contributions	Special Contributions	Total Contributions
Columbia	\$360,238	\$150,000	n/a	\$510,238
NFG	\$51,212	\$67,000	\$300	\$118,512
PECO-Gas*	\$14,928	\$562,165	\$7,102	\$548,195
Peoples	\$226,394	\$664,390	n/a	\$890,784
PGW	\$473	\$416,532	n/a	\$417,005
UGI Utilities – Gas	\$104,755	\$584,500	n/a	\$689,255
Total/Industry Average	\$758,000	\$2,444,587	\$7,402	\$3,209,989

*In 2022, PECO issued approximately \$3.7 million in additional one-time grants to eligible electric and natural gas customers in debt using unspent LIURP funds from 2020. See Docket No. P-2022-3032265.

Hardship Fund Benefits

The USRR also requires EDCs and NGDCs to report data on hardship fund benefits. The PUC defines **hardship fund benefits**⁴² 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.

Electric Public Utility Hardship Fund Grant Benefits – 2020-2022

Utility	Ratepayers Receiving Grants		Average Grant		Total Benefits Disbursed	
	2020-21	2021-22	2020-21	2021-22	2020-21	2021-22
Duquesne	2,340	5,327	\$281	\$429	\$657,661	\$2,285,617
Met-Ed	759	1,116	\$363	\$342	\$275,781	\$382,014
PECO-Electric*	147	3,685	\$613	\$894	\$90,044	\$3,293,783
Penelec	394	418	\$285	\$349	\$112,351	\$146,000
Penn Power	215	384	\$382	\$343	\$82,090	\$131,602
PPL	2,647	2,691	\$600	\$542	\$1,587,421	\$1,457,918
West Penn	620	638	\$390	\$347	\$241,728	\$221,314
Total/Industry Average	7,122	14,259	\$428	\$555	\$3,047,076	\$7,918,248

*In 2022, PECO issued approximately \$3.7 million in additional one-time grants to eligible electric and natural gas customers in debt using unspent LIURP funds from 2020. See Docket No. P-2022-3032265.

⁴² 52 Pa. Code §§ 54.72 and 62.2

Natural Gas Public Utility Hardship Fund Grant Benefits – 2020-2022

Utility	Ratepayers Receiving Grants		Average Grant		Total Benefits Disbursed	
	2020-21	2021-22	2020-21	2021-22	2020-21	2021-22
Columbia	3,282	1,302	\$378	\$376	\$1,239,146	\$489,884
NFG	59	192	\$278	\$357	\$16,402	\$68,553
PECO-Gas*	24	650	\$611	\$894	\$14,658	\$581,255
Peoples	3,258	3,022	\$404	\$404	\$1,317,840	\$1,221,974
PGW	440	890	\$940	\$1,093	\$413,586	\$972,777
UGI Utilities – Gas	4,397	3,248	\$410	\$309	\$1,802,592	\$1,003,837
Total/Industry Average	11,460	9,304	\$419	\$466	\$4,804,224	\$4,338,280

* In 2022, PECO issued approximately \$3.7 million in additional one-time grants to eligible electric and natural gas customers in debt using unspent LIURP funds from 2020. See Docket No. P-2022-3032265.

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.⁴³

Total Annual Electric Universal Service Program Spending – 2020-2022

Utility	2020	2021	2022
Duquesne	\$29,929,490	\$39,204,664	\$43,955,654
Met-Ed	\$22,573,045	\$28,150,876	\$32,644,211
PECO-Electric	\$66,347,907	\$78,006,963	\$104,712,604
Penelec	\$25,204,860	\$32,261,967	\$37,718,278
Penn Power	\$7,146,568	\$9,460,957	\$10,864,727
PPL	\$81,403,432	\$98,219,318	\$124,869,762
West Penn	\$24,672,676	\$28,250,486	\$34,029,515
Total/Industry Average	\$257,277,978	\$313,555,231	\$388,794,751

⁴³ 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.

Total Annual Natural Gas Universal Service Program Spending – 2020-2022

Utility	2020	2021	2022
Columbia	\$19,344,496	\$27,910,187	\$40,281,480
NFG	\$2,814,104	\$3,119,816	\$3,262,659
PECO-Gas	\$4,079,266	\$5,270,459	\$8,717,201
Peoples	\$13,004,345	\$17,946,949	\$25,375,267
PGW	\$53,651,466	\$76,119,413	\$82,787,907
UGI Utilities – Gas	\$11,646,898	\$13,016,594	\$17,963,899
Total/Industry Average	\$104,540,575	\$143,383,418	\$178,388,413

4. Small EDC and NGDC Universal Service Programs

The USRR has fewer data requirements for small EDCs and NGDCs.⁴⁴ BCS annually surveys EDCs with fewer than 60,000 residential customers and NGDCs with fewer than 100,000 residential customers to determine the availability of programs provided to low-income customers as well as the expenses associated with these programs. Five small EDCs and one small NGDC report providing universal service programs for their low-income customers in 2022:

EDCs	Residential Customers
Citizens' Electric	5,916
Pike County Power and Light	4,265
UGI Utilities Inc. – Electric	54,969
Valley Energy	6,485
Wellsboro Electric	5,148

NGDCs	Residential Customers
Peoples Gas LLC	58,000

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 (New Start Program) 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, 2022, the CAP enrollment was approximately 2,548 customers. Peoples Gas LLC's LIURP also completed 23 jobs in 2022.

UGI Utilities Inc. – Electric Division (UGI Electric) offers CAP, LIURP, CARES and Hardship Fund programs. As of Dec. 31, 2022, its CAP program enrollment was approximately 3,246 customers. UGI Electric's LIURP also completed 48 jobs in 2022.

⁴⁴ 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)	How Many Days Overdue	Days of Variance from BCS Interpretation
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

Appendix 3 – 2022 and 2023 Federal Poverty Guidelines

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.

2023 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	\$7,290	\$14,580	\$21,870	\$29,160
2	\$9,860	\$19,720	\$29,580	\$39,440
3	\$12,430	\$24,860	\$37,290	\$49,720
4	\$15,000	\$30,000	\$45,000	\$60,000
5	\$17,570	\$35,140	\$52,710	\$70,280
6	\$20,140	\$40,280	\$60,420	\$80,560
7	\$22,710	\$45,420	\$68,130	\$90,840
8	\$25,280	\$50,560	\$75,840	\$101,120
For each additional person, add	\$2,570	\$5,140	\$7,710	\$10,280

* Income reflects upper limit of the poverty guideline for each column.
Effective: Jan. 12, 2023. SOURCE: Federal Register, Vol. 88, Jan. 19, 2023, pp. 3424-3425.

Appendix 4 – Instructions to Access Universal Service Reports, Plans and Evaluations on PUC Website

To Access Universal Service Programs & Collections Performance Reports:

- Go to the PUC website at: www.puc.pa.gov.
- 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 “[Reports.](#)”
- 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: www.puc.pa.gov.
- On the PUC’s website, hover over the Electricity dropdown menu and click on the “[Universal Service](#)” 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: www.puc.pa.gov.
- On the PUC’s website, locate and click on the “[About](#)” tab on the headings bar.
- In the column of options on the left side of the page labeled “About the PUC,” locate and click “[Consumer Education.](#)”
- Locate the “Utility Assistance Programs” tile and click “[Find Support.](#)”

Appendix 5 – Universal Service Programs 2022 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	71.43%
UGI Utilities – Gas	USP Rider F	100%

* PGW's 2022 CAP, LIURP and CARES program costs were recovered from ratepayers in the following manner: residential (71.43%), commercial (23.11%), industrial (1.96%), municipal service (2.43%) and Philadelphia Housing Authority (PHA) (1.07%).

Appendix 6 – Universal Service Programs Annual CAP Spending Levels

Utility	2022 Annual CAP Spending	2022 Average Number of Ratepayers Paying CAP Costs	Estimated Annual CAP Spending per Ratepayer – 2020-2022		
			2020	2021	2022
Duquesne ¹	\$41,188,950	507,805	\$55.61	\$72.44	\$81.11
Met-Ed	\$26,617,895	515,226	\$33.96	\$43.66	\$51.66
PECO-Electric	\$98,248,863	1,521,223	\$41.22	\$47.28	\$64.59
Penelec	\$30,861,523	501,008	\$41.05	\$52.20	\$61.60
Penn Power	\$7,641,431	148,927	\$32.65	\$42.71	\$51.31
PPL	\$112,207,883	1,256,135	\$62.36	\$68.36	\$89.33
West Penn	\$26,507,957	631,990	\$30.46	\$33.65	\$41.94
Total/Industry Average	\$343,274,502	5,082,314	\$45.54	\$53.29	\$67.54
Columbia ¹	\$33,312,436	385,629	\$42.92	\$62.75	\$86.38
NFG ¹	\$2,410,572	189,948	\$10.46	\$11.23	\$12.69
PECO-Gas	\$6,313,600	500,154	\$6.16	\$5.82	\$12.62
Peoples ¹	\$21,459,081	565,883	\$19.10	\$27.48	\$37.92
PGW	\$53,007,273 ²	487,336	\$69.79	\$98.16	\$108.77
UGI Utilities – Gas ¹	\$13,741,475	598,675	\$16.76	\$17.54	\$22.95
Total/Industry Average	\$130,244,437	2,727,625	\$32.67	\$44.65	\$47.75

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 71.43% of PGW's \$74,208,698 2022 total CAP costs.

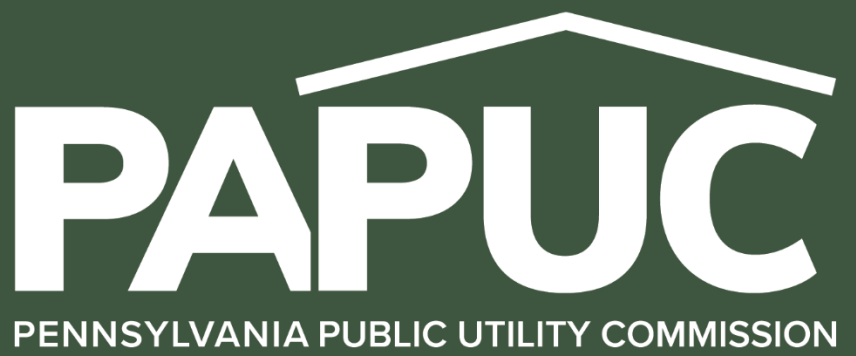
Appendix 7 – Universal Service Programs Total Annual Spending Levels

Utility	2022 Annual Total Universal Service Spending ¹	2022 Average Number of Ratepayers Paying Universal Service Costs	Estimated Annual Universal Service Spending per Ratepayer – 2020-2022		
			2020	2021	2022
Duquesne ²	\$43,955,654	507,805	\$58.97	\$77.16	\$86.56
Met-Ed	\$32,644,211	515,226	\$44.37	\$54.96	\$63.36
PECO-Electric	\$104,712,604	1,521,223	\$44.16	\$51.55	\$68.83
Penelec	\$37,718,278	501,008	\$50.25	\$64.29	\$75.28
Penn Power	\$10,864,727	148,927	\$48.61	\$63.87	\$72.95
PPL	\$124,869,762	1,256,135	\$65.46	\$78.50	\$99.41
West Penn	\$34,029,515	631,990	\$39.16	\$44.67	\$53.85
Total/Industry Average	\$388,794,751	5,082,314	\$51.04	\$61.88	\$76.50
Columbia ²	\$40,281,480	385,629	\$50.63	\$72.79	\$104.46
NFG ²	\$3,262,659	189,948	\$14.80	\$16.35	\$17.70
PECO-Gas	\$8,717,201	500,154	\$8.32	\$10.64	\$17.43
Peoples ²	\$25,375,267	565,883	\$23.19	\$32.01	\$44.84
PGW	\$59,135,402 ³	487,336	\$81.31	\$113.05	\$121.34
UGI Utilities – Gas ²	\$17,963,899	598,675	\$20.08	\$22.09	\$30.01
Total/Industry Average	\$178,388,413	2,727,625	\$38.85	\$52.95	\$65.40

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 2022 CAP spending includes only the amount recovered from residential customers, which was 71.43% of PGW's \$82,787,907 2022 total Universal Service costs.



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