



# Utility Consumer Activities Report and Evaluation

Pennsylvania Public Utility Commission



PUBLIC UTILITY COMMISSION

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# 1. Consumer Contacts to the Bureau of Consumer Services

The Pennsylvania Public Utility Commission's (PUC or Commission) Bureau of Consumer Services<sup>1</sup> (BCS) was mandated under Act 216 of 1976 to provide responsive, efficient and accountable management of consumer contacts. Its responsibilities were clarified under Act 114 of 1986 in regard to deciding and reporting on customer complaints. In order to fulfill its mandates, BCS began investigating and writing decisions on utility consumer complaints and service termination cases in April 1977. Since then, BCS has investigated 1,709,607 cases (consumer complaints and payment agreement requests) and has received 1,421,030 opinions and requests for information (inquiries). BCS received 73,850 utility customer contacts that required investigation in 2011. It is important to note that our statistical analysis indicates that more than 86 percent of these customer complaints had been appropriately handled by the subject utilities before the customers brought them to BCS. In these instances, the Commission has upheld the utility's actions.

## Case Handling

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

Once a customer contacts BCS with a complaint or payment agreement request (PAR), BCS notifies the utility that a complaint or PAR has been filed. The vast majority of consumers contact BCS by telephone using a toll-free number. There were 181,320 call-center contacts in 2011. Approximately 94 percent of the informal complaints were filed by telephone in 2011. The utility sends BCS all records concerning the complaint, including records of its contacts with the customer regarding the complaint. The BCS investigator reviews the records, interacts with both the complainant and utility, as necessary, renders a decision and closes the case. The Policy Division then examines the case and, among other things, classifies the complaint into one of seven major problem areas, as well as one of 40 specific problem categories. This case information is entered into the Consumer Services Information System (CSIS) database. The analysis from case information is used by BCS to generate reports to the Commission, utilities, legislators and the public. The reports may present information regarding utility performance, industry trends, investigations, new policy issues and the impact of utility or Commission policy.

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<sup>1</sup>BCS statutory basis, 66 Pa. C.S.A. § 308(d).

## Consumer Feedback Survey

In order to monitor its own service to consumers, BCS surveys those customers who have contacted BCS with a utility-related problem or PAR. The purpose of the survey is to collect information from the consumer's perspective about the quality of the BCS complaint-handling service. BCS mails a written survey form to a sample of consumers who have been served by BCS staff. The following table shows how consumers rate the service they received from BCS.

### Consumer Rating of BCS Service

How would you rate the service you received from the PUC (BCS)?	2010	2011
Excellent	55%	61%
Good	23%	21%
Fair	11%	9%
Poor	12%	9%

According to the survey results, 82 percent of consumers who contacted BCS in 2011 rated the BCS's service as "excellent" or "good." Appendix A presents more information about how consumers rated the service they received from BCS in 2010 and 2011. The results show 87 percent of consumers felt BCS handled their complaint either "very quickly" or "fairly quickly." In addition, 66 percent of consumers said the information the Commission gave them about the outcome of the problem was either "very easy to understand" or "fairly easy to understand." Further, 93 percent of consumers indicated the BCS staff person who took their call was either "very polite" or "fairly polite," and 90 percent described the BCS contact person as "very interested" or "fairly interested" in helping with the problem. Eighty-five percent of consumers reported they would contact the Commission again if they were to have another problem with a utility that they could not settle with the company.

BCS management frequently reviews the findings of the consumer feedback survey and promptly investigates any negative trends to improve staff performance.

## Databases

To manage and use its complaint data, BCS maintains a computer-based Consumer Services Information System (CSIS) through a contract with the Pennsylvania State University. This system enables BCS to aggregate and analyze complaints from the thousands of informal complaints that are reported to the Commission each year. In this way, BCS can address generic as well as individual problems.

The majority of the data presented in this report is from CSIS. In addition, this report includes statistics from BCS's Collections Reporting System (CRS), Local Exchange Carrier Reporting System (LECRS) and Compliance Tracking System (CTS). Both the CRS (for electric

and gas) and the LECRS (for telephone) provide valuable resources for measuring changes in company collection performance, including the number of residential service terminations, while CTS maintains data on the number and type of apparent infractions attributable to the major utilities.

## Distinctions Among Cases

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

Commercial customer contacts also were excluded from the data used in the analysis. Although BCS's regulatory authority has largely been confined to residential accounts, the Bureau handled 1,923 cases from commercial customers in 2011. Of these cases, 335 were related to loss of utility service, while 1,588 were consumer complaints.

With respect to the 335 cases referenced above, BCS does not make payment agreements for commercial accounts. Due to its limited jurisdiction, BCS does not issue decisions regarding commercial disputes. Instead, Bureau investigators give commercial customers information regarding the company position or attempt to mediate a mutually acceptable agreement regarding the disputed matter. All cases in 2011 that involved commercial accounts were deleted from the analyses in subsequent chapters of this report. The table on the next page shows that the vast majority of cases handled by BCS in 2011 involved residential utility service. Appendix B presents a comparison of the number of residential and commercial consumer complaints and PARs for 2010 and 2011.

## Total Volume of Consumer Complaints and Payment Agreement Requests (PARs) to BCS in 2011

Industry	Consumer Complaints		Payment Agreement Requests	
	Residential	Commercial	Residential	Commercial
Electric	6,615	786	42,603	223
Gas	2,311	239	11,162	92
Water	787	73	4,568	11
Telephone	3,412	489	460	9
Other	5	1	4	0
<b>Total</b>	<b>13,130</b>	<b>1,588</b>	<b>58,797</b>	<b>335</b>

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

### Consumer Complaints

Most consumer complaints regarding the electric, gas, water, sewer and steam heat industries deal with matters covered under 52 Pa. Code, Chapter 56 "Standards and Billing Practices for Residential Utility Service" and/or Chapter 14, the "Responsible Utility Customer Protection Act" (66 Pa.C.S. §§ 1401-1408). (Sewer and steam heat complaints are designated as "other" in the previous table and the tables that follow.) For the telephone industry, most of the cases found in the consumer complaint category deal with matters covered by 52 Pa. Code, Chapter 64, "Standards and Billing Practices for Residential Telephone Service" and Chapter 63 regulations for telephone service. For the most part, consumer complaints represent customer appeals to the Commission resulting from the inability of the utility and the customer to reach a mutually satisfactory resolution to a dispute.

## Consumer Complaints by Industry\* 2010-11

Industry	2010	2011	% Change
Electric	5,852	7,401	26%
Gas	2,687	2,550	-5%
Water	1,034	860	-17%
Telephone	3,762	3,901	4%
Other	6	6	0%
<b>Total</b>	<b>13,341</b>	<b>14,718</b>	<b>10%</b>

\* Table includes both residential and commercial consumer complaints.

During 2011, electric and gas utilities accounted for 50 percent and 17 percent, respectively, of all consumer complaints investigated by BCS. Water utilities accounted for 6 percent of consumer complaints while telephone utilities were the subject of 27 percent of all consumer complaints.

### Justified Consumer Complaints

Once a BCS investigator finishes the investigation of a consumer's complaint and makes a decision regarding the complaint, BCS reviews the utility's records to determine if the utility took appropriate action when handling the customer's contact and uses these records to determine the outcome of the case. This approach focuses strictly on the regulatory aspect of the complaint and evaluates utilities negatively only where, in the judgment of BCS, appropriate complaint handling procedures were not followed or applicable regulations were not properly applied by the utility. Specifically, a case is considered "justified" in the appeal to BCS if it is found that, prior to BCS intervention, the company did not comply with Commission Orders, regulations, reports, Secretarial Letters, tariffs, etc.

### Classification of Consumer Complaints

After a BCS investigator closes a case from a utility customer, the BCS Policy Division reviews the information on the case and translates it into a format so that it can be added to BCS's information system (CSIS). One part of this process is that the policy staff categorizes each complaint into a specific problem category and enters it into the computerized system. The BCS data system then aggregates the data from all complaints to produce meaningful reports for analysis by and for BCS, as well as for the Commission and utilities.

BCS has categorized the 2011 residential consumer complaints into 13 categories for each of the electric, gas and water utilities, and into 11 categories for each of the telephone utilities. Tables that show the percent of complaints in each category in 2011 appear in each industry chapter. The percentages shown in the tables are for all of the cases that residential consumers filed with BCS, not just the cases that are determined to be justified in

coming to BCS. BCS analyzes the categories that generate complaints or problems for customers, even if the utility records indicate that the utility followed Commission procedures and guidelines in handling the complaint. BCS often discusses its findings with individual utilities so they can use the information to review their complaint-handling procedures in categories that seem to produce large numbers of consumer complaints to the Commission. The four tables in Appendix E show the actual number of cases that fell into each category in 2011.

## Payment Agreement Requests

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

- Suspension/termination of service is pending;
- Service has been terminated and the customer needs payment terms to have service restored; or
- The customer wants to eliminate an arrearage.

All of the measures pertaining to PARs are based on assessments of contacts to BCS from individual customers. As with consumer complaints, almost all customers had already contacted the utility prior to contacting BCS. During 2011, BCS handled 59,132 PARs from customers of the utilities under the Commission's jurisdiction.

On Nov. 30, 2004, Senate Bill 677, now known as Act 201, was signed into law. This Act went into effect on Dec. 14, 2004. Act 201 amended Title 66 by adding Chapter 14 (66 Pa.C.S. §§ 1401-1418), the "Responsible Utility Customer Protection Act." The legislation is applicable to most of the electric, gas and water companies in Pennsylvania. This report is the seventh report on consumer complaint and PAR activity under this law.

In January 2011, the Commission issued its Third Biennial Report to the General Assembly and the Governor reviewing the implementation of Chapter 14. On June 9, 2011, the Commission adopted a final rulemaking order incorporating Chapter 14 into the Chapter 56 Standards and Billing Practices for Residential Utility Service. The Independent Regulatory Review Commission (IRRC) approved the final form regulations on July 21, 2011. The new Chapter 56 regulations were published in the Pennsylvania Bulletin on Oct. 8, 2011, and are now in effect.

In 2011, the overall volume of PARs handled by the Commission increased by 7 percent from the previous year. PARs from electric customers increased 14 percent from 2010 to 2011. PARs from gas customers decreased 7 percent; while PARs from water customers were down 10 percent and PARs from telephone customers declined 24 percent from 2010 to 2011.

The Commission strives to implement Chapter 14 in a manner that will allow it to achieve the policy goals of increasing utility account collections and to avoid the passing along of bad debt costs to paying consumers. At the same time, the Commission works to implement Chapter 14 as fairly as possible to help ensure that service remains available to all customers on reasonable terms and conditions. The Commission is dedicated to using a

collaborative process that takes into account the needs of both utilities and consumers, and gives all parties an opportunity to participate in these efforts.

### Payment Agreement Requests (PARs) by Industry\* 2010-11

Industry	2010	2011	% Change
Electric	37,566	42,826	14%
Gas	12,039	11,254	-7%
Water	5,079	4,579	-10%
Telephone	621	469	-24%
Other	13	4	-69%
<b>Total</b>	<b>55,318</b>	<b>59,132</b>	<b>7%</b>

\* Table includes both residential and commercial PARs. Please note: All consumer contacts requesting a payment agreement are taken in and classified as a PAR. However, not all customers requesting a PAR receive one. BCS does not have the authority to offer PARs for commercial accounts.

As in past years, the majority of requests for payment agreements in 2011 involved electric or gas companies. Seventy-two percent of the PARs (42,826 cases) were from electric customers, and 19 percent (11,254 cases) were from gas customers. Also, 8 percent of PARs (4,579 cases) came from customers of various water utilities. Only 1 percent of PARs (469) came from telephone customers.



## Inquiries and Opinions

During 2011, BCS and its call centers received 66,747 customer contacts that, for the most part, required no follow-up investigation beyond the initial contact. BCS classifies these contacts as "inquiries." The inquiries for 2011 include contacts to the BCS Utility Customer Hotline, as well as contacts to BCS using mail service and email communication.

In large part, the inquiries in 2011 involved customers who did not want BCS to review their CAP budget amounts and terminations or suspensions of service. BCS also classifies certain PARs as inquiries. For example, BCS does not issue payment decisions on requests to restore or avoid suspension/termination of toll or nonbasic telephone service. When consumers call with these problems, BCS classifies these requests as inquiries. Similarly, if a customer has recently been through the BCS payment agreement process and calls again with a new request regarding the same account, BCS does not open a new PAR case. In these instances, BCS classifies the customer's contact as an inquiry.

As in past years, BCS also has shifted some contacts that originated as consumer complaints and payment agreement requests into the inquiry category because it was not appropriate to count these contacts as informal complaints. Examples of these contacts include complaints that were found to be duplicates, informal complaints filed against the wrong company, informal complaints that BCS handled in spite of the fact that customers had not previously contacted their companies about their problems, and cases that the investigators verbally dismissed. In all, these 692 cases accounted for 1 percent of inquiries in 2011.

BCS is able to expand its list of reasons for contact as customers' reasons grow and change. Currently, the list includes 77 reasons for contact from consumers. Possible actions by BCS intake staff include: recording the consumer's opinion; giving information to the consumer; referring the consumer to a utility company; and referring the consumer to an agency or organization outside of the Commission. If the contact requires further action, the intake staff refers the contact to a BCS investigator, and the contact becomes a consumer complaint or a payment agreement request. The following table shows the various reasons for contact for the 2011 inquiries.

## Categories of 2011 Inquiries

Reason for Contact	Number	Percent
CAP review – declined	12,332	18%
Termination or suspension of service	12,204	18%
Competition issues and requests for information	8,166	12%
Unable to open new PAR – service on	7,464	11%
PUC has no jurisdiction	5,192	8%
Billing dispute	3,801	6%
Request for general information	3,785	6%
People-delivered company service	2,220	3%
Applicant/deposit issue	2,003	3%
Service (company facilities)	1,731	3%
Rate protest	1,442	2%
Weather outage	485	1%
Rate complaint	162	<1%
Unable to open new PAR – service off	109	<1%
Cramming	52	<1%
Slamming	13	<1%
Other miscellaneous reasons	3,631	5%
Reason for contact is not available	1,955	3%
<b>Total</b>	<b>66,747</b>	<b>99%</b>

### Residential Consumer Complaints Not Included in Industry Chapters

Traditionally, the primary focus of BCS's review of utilities' complaint handling has been on the performance of the major electric, gas, water and telephone utilities. However, for the past several years, BCS has included a limited amount of complaint information for the non-major utilities and the other service providers in the UCARE. In 2011, BCS experienced a major increase in the overall number of residential consumer complaints. For the non-major utilities, consumer complaints increased over the year in the electric and gas industries, but decreased in the water and telephone industries. In the electric industry, consumer complaints rose significantly for the non-major companies, up 721 percent from 2010. This section presents information about the residential consumer complaints that are not included in the industry chapters that follow.

In 2011, BCS staff investigated consumer complaints about a variety of problems that consumers were having with the non-major companies under the Commission's jurisdiction. The vast majority of complaints not included in the industry chapters involved deceptive advertising/sales practices.

Residential consumer complaints related to competition billing disputes or general billing disputes generated the next highest volume of complaints to BCS from customers of

the non-major electric, gas, water and telephone companies. Those three types of complaints accounted for 56 percent of the residential consumer complaints about the non-major companies in the electric industry; 51 percent of residential consumer complaints about the non-major gas companies; 34 percent of the complaints about the non-major telecommunications companies; and 25 percent of the complaints about the non-major water companies in 2011.

Appendix C presents a summary of the residential consumer complaints that are not included in the electric, gas, water and telephone chapters that follow. The table lists the non-major companies for these industries, the electric generation suppliers and natural gas suppliers, and other providers of telecommunications services having five or more residential consumer complaints in 2011.

## Calls to the Commission about Electric and Gas Competition

In 2011, the Commission's call center employees used BCS's computerized information system to record information from the consumer contacts about electric and gas competition. Statistics show that 93 percent of contacts about electric and gas competition are related to the electric industry while 7 percent concern the gas industry.

In 2011, call center employees recorded information from 8,897 consumer contacts about competition in the energy industries. Many calls came from consumers who called about various issues associated with customer choice in the electric and gas industries. Most frequently consumers called to request competition documents and to seek information about competition in general (41 and 20 percent, respectively).

In most instances, BCS classified these contacts as inquiries because they required no investigation or follow-up. The BCS or call center staff person took care of the consumer's request or question at the initial contact. However, some consumer contacts required further investigation and possibly action to resolve the consumer's concerns. In these cases, BCS classified the contacts as consumer complaints and investigated the consumer's issue. In 2011, deceptive advertising/sales produced the largest volume of competition-related consumer complaints. Appendix D-1 explains the types of competition complaints BCS handles.

In prior years, BCS investigated a number of consumer complaints in which consumers alleged they were assigned to an electric or gas supplier without their consent or knowledge (slamming). In 2011, the BCS received 185 allegations of electric slamming and 21 allegations of slamming in the gas industry. There were 53 allegations of slamming in the telephone industry. With respect to slamming, the Commission has stated clearly, it "...will have zero tolerance for slamming by any means and in any form."<sup>2</sup> The Commission views customer slamming as among the most serious violations of consumer regulations. Of the 259 slamming complaints received by BCS, 217 were filed by residential customers.

During the early phases of electric and gas competition, BCS expected it would receive consumer complaints associated with the transition to customer choice. As expected, many customers experienced a variety of problems as they began choosing

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<sup>2</sup> L-00970121, Public Meeting of May 21, 1998.

electric and gas suppliers. BCS found that, after investigating these complaints, it was often difficult to determine who was at fault in causing the complaint. Thus, BCS decided that it would be unfair to include competition complaints with consumer complaints about other issues when it calculates the performance measures it uses to evaluate and compare companies within the electric and gas industries. BCS continued this practice in 2011. Therefore, BCS excluded 884 competition-related complaints from the data set used to prepare the tables in the electric industry chapter and 95 such complaints in the gas industry chapter.

## Informal Compliance Process and Infractions

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

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

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

## 2. Performance Measures

For the most part, BCS uses complaints it receives from customers of the major electric, gas, water and telephone utilities to assess utilities' complaint-handling performance. In nearly every case, the customer had already contacted the company about the problem prior to contacting BCS. BCS reviews the utility's record as to how the utility handled the complaint when the customer contacted the company. The review includes several classifications and assessments that form the basis of all the performance measures presented in this and the next four chapters, with the exception of the number of terminations and termination rate. The termination statistics for the electric and gas companies are drawn from reports required by Chapter 56 at §56.231(8), while telephone termination statistics are drawn from reports required by Chapter 64 at §64.201(7). The sections that follow explain the various measures BCS employs to assess utility performance.

### Consumer Complaint Rate

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

### Justified Consumer Complaint Rate

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

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

BCS monitors the complaint rates and justified rates of the major utilities, paying particular attention to the number of justified complaints that customers file with the Commission. Justified complaints may indicate areas where BCS should discuss complaint-handling procedures with a utility so that its customers receive fair and equitable treatment

when they deal with the utility. When BCS encounters company case-handling performance (justified consumer complaint rate) that is significantly worse than average, there is reason to suspect that many customers who contact the utility are at risk of improper dispute handling by the utility. As part of the monitoring process, BCS compares the “justified” rates of individual utilities and industries over time and investigates significant changes when they occur. In the chapters that follow, BCS compares the consumer complaint rates and the justified consumer complaint rates of the major utilities within the electric, gas, water and telephone industries.

## Response Time to Consumer Complaints

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

## Payment Agreement Request Rate

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

## Justified Payment Agreement Request Rate

Just as with consumer complaints, once a customer contacts BCS with a PAR, BCS notifies the utility. The company sends a report to BCS that details the customer’s payments, usage and payment negotiation history. A BCS investigator considers the customer’s record and makes a decision regarding the amortization of the amount owed, and notifies the company and the customer of the decision. The BCS Policy Division reviews the record to determine if the utility negotiated properly with the customer and uses this record to determine the outcome of the case. This approach evaluates companies negatively only when BCS finds appropriate payment negotiation procedures were not followed or where the regulations have been misapplied. Specifically, a case is considered “justified” in the appeal to BCS if it is found that, prior to BCS intervention, the company did not comply with Commission regulations, reports, Secretarial Letters, tariffs or guidelines.



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

## Response Time to Payment Agreement Requests

Once a customer contacts BCS with a PAR, BCS notifies the utility. The utility then sends BCS records that include the customer's payment history, the amount owed, prior payment agreements, and the results of the most recent payment negotiation with the customer. Response time is the number of days from the date BCS first contacts the utility regarding a PAR to the date on which the utility provides BCS with its utility report so that BCS is able to issue payment terms, resolve any other issues raised by the customer and determine whether the customer was justified in seeking a payment agreement through BCS. Response time quantifies the speed of a utility's response to BCS payment agreement requests. In the following chapters, response time is presented as the average number of days that each utility took to supply BCS with its utility report.

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

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

## Infraction Rate

During 2011, BCS continued its informal compliance notification process to improve utility compliance with applicable statutes and regulations relating to the treatment of residential accounts. In order to compare utilities of various sizes within an industry, BCS has calculated a measure called "infraction rate." The infraction rate is the number of informally verified infractions for each 1,000 residential customers.

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

The value of the infraction rate is to depict industry trends over time. The trend for 2011 is calculated using BCS's Compliance Tracking System (CTS) data as of May 27, 2012, for the electric, gas and water industries, and April 27, 2012, for the telephone industry. The 2011 trends may change if the total number of infractions increases or decreases upon review by the BCS. This would occur if new infractions are discovered from customer complaints that originated in 2011, but were still under investigation by BCS when the data was retrieved from the CTS. Often, the total number of infractions for the year will change from the number cited in this report. BCS will update the number of infractions found on 2011 cases in the report on 2012 complaint activity. Infraction rates for each major electric, gas, water and telephone utility company are shown for 2009, 2010 and 2011 in upcoming chapters. Appendix H shows detailed information about the infractions BCS gleaned from its review of the 2011 consumer complaints and payment agreement requests. The information presented in Appendix H shows the infractions of Chapter 56, Chapter 14 and other regulations for the major electric, gas and water companies, and the infractions of Chapters 63 and 64 for the major telephone companies.

## Termination Rate

Payment over time through a mutually acceptable payment agreement is one possible outcome when a customer owes an outstanding balance to a utility company. Termination of the utility service is another. BCS views termination of utility service as a utility's last resort when customers fail to meet their payment obligations. The calculation of the termination rate allows the reader to compare the termination activity of utilities with differing numbers of residential customers. For the electric and natural gas industries, the termination rate is the number of service terminations divided by the number of residential customers. For the telephone industry, the termination rate is the number of terminations for each 1,000 residential customers. Any significant increase in the termination rate would indicate a trend or pattern the Commission may need to investigate. Water utilities do not report service termination statistics to the Commission. Thus, the water industry chapter does not include termination rate information.

## BCS Performance Measures and Industry Chapters

The tables in the following chapters present the data alphabetically by company name. Each chapter includes tables that show the consumer complaint rate and the justified consumer complaint rate of each major utility. Also included in the industry chapters are tables that show the prior year's justified consumer complaint rates and justified payment agreement request rates for each of the major utilities. The tables also reflect the average rates of the major utilities within the industry for each of these measures. In addition, each industry chapter presents tables that show infraction rates for the major utilities, response times to consumer complaints and payment agreement requests, and the termination rates for the major electric, gas and telephone utilities.

It is important to note that the electric and gas industry chapters present only data from those utilities that have more than 100,000 residential customers. In the water industry chapter, data for the "Class A" water utilities that have fewer than 100,000 residential customers are presented together as a whole. The telephone chapter presents data from those local service providers serving more than 50,000 residential customers.



BCS has found the inclusion of statistics for the smaller utilities can skew the average of industry statistics in ways that do not fairly represent industry performance. For this reason, BCS excluded the statistics involving UGI-Electric when it calculated the 2010 and 2011 averages for the electric industry. Similar to previous years, statistics for UGI-Electric are included in the appendices of this report.

## Universal Service and Energy Conservation Programs

The Commission has a long history of involvement in universal service and energy conservation programs that help utility consumers obtain and keep service, and conserve energy. At the end of the water and telephone chapters that follow, readers will find highlights of the water and telephone programs that the Commission has supported and encouraged, not only in 2011, but in prior years as well.

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

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

In August 2012, the Commission released the 12th annual report on Universal Service Programs and Collections Performance. BCS prepared the report, which presents 2011 universal service and collections data for the major electric and natural gas distribution companies. The report is available on the Commission's website at:

[http://www.puc.pa.gov/General/publications\\_reports/pdf/EDC\\_NGDC\\_UniServ\\_Rpt2011.pdf](http://www.puc.pa.gov/General/publications_reports/pdf/EDC_NGDC_UniServ_Rpt2011.pdf)

### 3. Electric Industry

In 2011, the Commission had jurisdiction over 15 electric distribution companies (EDCs). However, the majority of the consumer complaints and payment agreement requests (PARs) involving the electric industry were from residential customers of the seven major EDCs: Duquesne Light Co. (Duquesne); Metropolitan Edison Co. (Met-Ed) – a FirstEnergy Co.; PECO Energy Co. (PECO); Pennsylvania Electric Co. (Penelec) – a FirstEnergy Co.; Pennsylvania Power Co. (Penn Power) – a FirstEnergy Co.; PPL Electric Utilities Inc. (PPL); and West Penn Power Co. f/k/a Allegheny Power Co. (West Penn). This chapter will focus exclusively on those seven companies. Most of the complaints and payment agreement requests dealt with matters covered under 52 Pa. Code, Chapter 56 Standards and Billing Practices for Residential Utility Service or 66 Pa. C.S.A. Chapter 14 Responsible Utility Customer Protection. Generally, consumer complaints and payment agreement requests represent customer appeals to the Commission resulting from the inability of the company and the customer to reach a mutually satisfactory resolution to a dispute or payment negotiation.

The statistics in the tables on the pages that follow depict the performance of each of the seven major electric utilities in 2011. The tables in the appendices also include UGI-Electric, a major EDC with fewer than 100,000 residential customers. BCS investigated complaints in 2011, generated as a result of the electric choice program, which allows customers to choose an electric generation supply company. However, as mentioned in the first chapter, BCS removed these complaints from the data it used to prepare the tables on consumer complaints and payment agreement requests. Appendices E through H present statistics on the performance of the seven largest EDCs and UGI-Electric in 2010 and 2011.

#### Consumer Complaints

During 2011, BCS handled 5,954 consumer complaints from residential customers of the various EDCs and 661 consumer complaints from residential customers of electric generation supply companies. Of these residential complaints, 89 percent (5,874) were from customers of the seven largest EDCs. For the analyses in this chapter, BCS excluded a total of 113 consumer complaints about the major EDCs that involved competition issues.

#### Consumer Complaint Categories

After a BCS investigator closes a consumer complaint, the BCS Policy Division reviews the complaint, categorizes it into a specific problem category and enters it into BCS's computerized information system. The BCS data system then aggregates the data from all complaints. The following table shows the percentage of 2011 complaints from residential customers of the seven largest EDCs in each of the 13 categories used by the BCS Policy Division to categorize consumer complaints about electric, gas and water utilities. Appendix E, Table 1, provides the actual number of cases that fell into each category in 2011.

## Consumer Complaint Categories\*: 2011 Major Electric Distribution Companies

Categories	Duquesne	Met-Ed	PECO+	Penelec	Penn Power	PPL	West Penn	Electric Majors
Personnel Problems	29%	10%	16%	13%	14%	16%	12%	16%
Billing Disputes	12%	15%	20%	22%	14%	16%	11%	15%
Service Interruptions	4%	33%	3%	4%	1%	11%	9%	13%
Metering	2%	14%	6%	21%	11%	8%	12%	11%
Credit and Deposits	6%	5%	5%	5%	8%	3%	19%	7%
Discontinuance/ Transfer	8%	4%	13%	6%	7%	11%	3%	7%
Other Payment Issues	11%	2%	8%	4%	6%	8%	2%	6%
Damages	3%	3%	2%	6%	4%	2%	9%	4%
Scheduling Delays	2%	3%	1%	5%	4%	2%	5%	3%
Service Extensions	1%	2%	1%	3%	5%	1%	4%	2%
Rates	1%	1%	2%	1%	7%	9%	<1%	2%
Service Quality	1%	2%	3%	1%	0%	1%	2%	2%
All Other Problems	20%	7%	19%	10%	18%	11%	12%	13%
<b>Total-Number**</b>	<b>613</b>	<b>799</b>	<b>342</b>	<b>452</b>	<b>112</b>	<b>370</b>	<b>385</b>	<b>3,073</b>

\* Columns may total more or less than 100 percent due to rounding.

\*\* Based on residential complaints evaluated by BCS as of May 27, 2012.

+ PECO statistics include electric and gas, and are based on a probability sample of cases.

- Categories are for all residential complaints filed with BCS, whether they were found to be justified. See Appendix D-1 for an explanation of complaint categories and Appendix E, Table 1, for the number of cases in each category.
- In 2011, personnel problems accounted for 16 percent of the consumer complaints for the major EDCs. Billing disputes accounted for 15 percent of the consumer complaints, and service interruptions accounted for 13 percent of the consumer complaints. These three categories accounted for 44 percent of consumer complaints about the major EDCs.

## 2011 Residential Consumer Complaint Rates/ Justified Consumer Complaint Rates Major Electric Distribution Companies

Company	Consumer Complaint Rate	Justified Consumer Complaint Rate
Duquesne	1.48	0.18
Met-Ed	1.99	0.12
PECO+	1.21	0.20*
Penelec	1.11	0.09
Penn Power	0.99	0.04
PPL	1.02	0.08
West Penn	0.76	0.11
<b>Average</b>	<b>1.22</b>	<b>0.12</b>

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

+ PECO statistics include electric and gas.

- The consumer complaint rate equals the number of consumer complaints for each 1,000 residential customers. The justified consumer complaint rate equals the number of justified consumer complaints for each 1,000 residential customers.
- For the major EDCs, the average of the consumer complaint rates is more than 10 times greater than the average of the justified consumer complaint rates.
- Appendix F, Table 1, presents the number of consumer complaints, the consumer complaint rate, the number of justified consumer complaints and the justified consumer complaint rate for each major EDC in 2010 and 2011.

## 2010-11 Justified Residential Consumer Complaint Rates Major Electric Distribution Companies

Company	2010	2011
Duquesne	0.14	0.18
Met-Ed	0.10	0.12
PECO*+	0.22	0.20
Penelec	0.05	0.09
Penn Power	0.06	0.04
PPL	0.12	0.08
West Penn	0.14	0.11
<b>Average</b>	<b>0.12</b>	<b>0.12</b>

\* Based on a probability sample of cases.

+ PECO statistics include electric and gas.

- The justified consumer complaint rate equals the number of justified consumer complaints for each 1,000 residential customers.
- The average of the justified consumer complaint rates for the major electric distribution companies remained unchanged in 2010 and 2011 at 0.12.
- Of the seven major EDCs, four have justified consumer complaint rates that are lower than the industry average. Met-Ed's rate is equal to the industry average, while Duquesne and PECO have justified consumer complaint rates that are higher than the 2011 industry average.
- Appendix F, Table 1, presents the number of consumer complaints, the consumer complaint rate, the number of justified consumer complaints and the justified consumer complaint rate for each major EDC in 2010 and 2011.

## 2010-11 Response Time to BCS Residential Consumer Complaints Major Electric Distribution Companies

Company	Number of Days 2010	Number of Days 2011	Change in Days 2010 to 2011
Duquesne	18.6	17.7	-0.9
Met-Ed	11.0	12.1	1.1
PECO+	11.8	8.3	-3.5
Penelec	9.3	12.2	2.9
Penn Power	9.4	10.4	1.0
PPL	22.7	21.4	-1.3
West Penn	13.2	12.0	-1.2
<b>Average</b>	<b>13.7</b>	<b>13.4</b>	<b>-0.3</b>

+ PECO statistics include electric and gas.

- Beginning in 2007, the calculation for average response time includes all residential consumer complaints for the major electric companies. In prior years, BCS used only the response times for evaluated consumer complaints in this calculation.
- Overall, the average response time fell from 13.7 to 13.4 days in 2011.
- PECO had the shortest consumer complaint response time in 2011 at 8.3 days while PPL had the longest at 21.4 days. Penelec's consumer complaint response time increased nearly three days from 2010 to 2011.

### Payment Agreement Requests

In 2011, BCS handled 42,603 payment agreement requests (PARs) from residential customers of the EDCs. Ninety-eight percent (41,754) of the residential PARs were from customers of the seven largest EDCs. In 2011, BCS reviewed a representative sample of the PARs for each of the seven largest EDCs: Duquesne, Met-Ed, PECO, Penelec, Penn Power, PPL and West Penn. Thus, the calculation for justified payment agreement request rate that appears in the pages that follow is based on a subset of cases that BCS received from the customers of these utilities. BCS believes that the size of the samples gives a reasonable indication of the performance of these companies. Appendix G, Table 1, provides additional statistics regarding the payment agreement requests from residential customers of the major EDCs.

**2011 Residential Payment Agreement Request (PAR) Rates/  
Justified PAR Rates\*  
Major Electric Distribution Companies**

Company	PAR Rate	Justified PAR Rate
Duquesne	10.70	0.13
Met-Ed	4.36	0.06
PECO+	6.35	0.10
Penelec	3.68	0.06
Penn Power	4.72	0.12
PPL	16.33	0.90
West Penn	4.25	0.24
<b>Average</b>	<b>7.20</b>	<b>0.23</b>

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

+ PECO statistics include electric and gas.

- The PAR rate equals the number of PARs for each 1,000 residential customers. The justified PAR rate equals the number of justified PARs for each 1,000 residential customers.
- On average, there were more than seven PARs to BCS for each 1,000 residential customers of the major EDCs in 2011. There was less than one justified PAR for each 1,000 residential customers.
- The implementation of Chapter 14 had an impact on the 2011 PAR rates and justified PAR rates.
- Appendix G, Table 1, presents the number of PARs, the PAR rate, the number of justified PARs and the justified PAR rate for each major EDC in 2010 and 2011.

**2010-11 Justified Residential  
Payment Agreement Request (PAR) Rates\*  
Major Electric Distribution Companies**

Company	2010	2011
Duquesne	0.25	0.13
Met-Ed	0.12	0.06
PECO+	0.34	0.10
Penelec	0.10	0.06
Penn Power	0.09	0.12
PPL	0.86	0.90
West Penn	0.89	0.24
<b>Average</b>	<b>0.38</b>	<b>0.23</b>

\* Based on a probability sample of cases.  
+ PECO statistics include electric and gas.

- The justified PAR rate equals the number of justified PARs for each 1,000 residential customers.
- The average of the justified PAR rates for the seven major EDCs decreased from 0.38 in 2010 to 0.23 in 2011.
- The justified PAR rates decreased for five of the seven major EDCs from 2010 to 2011. Two of the major EDCs have justified PAR rates greater than the 2011 industry average while five of the major EDCs have justified PAR rates below the industry average.
- The implementation of Chapter 14 had an impact on the 2010 and 2011 justified PAR rates.
- Appendix G, Table 1, presents the number of PARs, the PAR rate, the number of justified PARs and the justified PAR rate for each major EDC in 2010 and 2011.



**2010-11 Response Time to BCS  
Residential Payment Agreement Requests (PARs)  
Major Electric Distribution Companies**

Company	Number of Days 2010	Number of Days 2011	Change in Days 2010 to 2011
Duquesne	13.3	10.6	-2.7
Met-Ed	2.3	3.4	1.1
PECO+	4.7	3.4	-1.3
Penelec	2.5	3.5	1.0
Penn Power	2.5	3.9	1.4
PPL	10.3	15.5	5.2
West Penn	10.9	5.7	-5.2
<b>Average</b>	<b>6.6</b>	<b>6.6</b>	<b>0.0</b>

+ PECO statistics include electric and gas.

- Beginning in 2007, the calculation for average response time includes all residential PARs for the major electric companies. In prior years, BCS used only the response times for evaluated PARs in this calculation.
- The average response time for the seven major EDCs remained unchanged from 2010 to 2011 at 6.6 days.
- There is a wide range of PAR response times among the major EDCs for 2011, from a low of 3.4 days for Met-Ed and PECO to a high of 15.5 days for PPL.

### Termination and Reconnection of Service

Each month, the electric companies report to the Commission the number of residential accounts that they terminated for non-payment during the previous month. They also report the number of previously terminated residential accounts that they reconnected during the month. Some EDCs maintain a fairly consistent pattern of termination behavior while others fluctuate from year to year. The number of reconnections varies from year to year and from company to company depending on a variety of factors. The EDC reconnects a customer's terminated service when a customer either pays his/her debt in full or makes a significant payment on the debt and agrees to a payment agreement for the balance owed to the company. The following tables indicate the annual number of residential accounts each of the seven largest EDCs terminated and reconnected in 2009, 2010 and 2011. The first table also presents the termination rates for each of these companies.

## Residential Service Terminations/Termination Rates Major Electric Distribution Companies

Company	Residential Service Terminations				Termination Rates		
	2009	2010	2011	% Change 2010-11	2009	2010	2011
Duquesne	23,143	21,915	22,927	5%	4.41	4.18	4.37
Met-Ed	12,915	10,676	18,169	70%	2.67	2.20	3.73
PECO+	76,862	78,180	81,408	4%	5.43	5.51	5.71
Penelec	9,878	6,750	17,513	159%	1.96	1.34	3.46
Penn Power	3,196	1,705	3,622	112%	2.29	1.22	2.58
PPL	33,247	33,536	33,641	<1%	2.75	2.77	2.77
West Penn	17,057	16,803	15,351	-9%	2.78	2.73	2.49
<b>Major Electric</b>	<b>176,298</b>	<b>169,565</b>	<b>192,631</b>	<b>14%</b>			
<b>Average of Rates</b>					<b>3.18</b>	<b>2.85</b>	<b>3.59</b>

+ PECO statistics include electric and gas.

- The termination rate is the number of service terminations divided by the number of residential customers, expressed as a percent.
- Overall, the seven major EDCs terminated 14 percent more residential accounts in 2011 than in 2010.

## Residential Service Reconnections Major Electric Distribution Companies

Company	2009	2010	2011	% Change 2010-11
Duquesne	16,877	15,946	16,846	6%
Met-Ed	10,279	7,650	14,696	92%
PECO+	52,281	55,863	58,323	4%
Penelec	7,603	4,111	14,209	246%
Penn Power	2,739	1,104	3,316	200%
PPL	23,424	22,158	22,727	3%
West Penn	10,500	10,121	9,914	-2%
<b>Major Electric</b>	<b>123,703</b>	<b>116,953</b>	<b>140,031</b>	<b>20%</b>

+ PECO statistics include electric and gas.

- Overall, the seven major EDCs reconnected 20 percent more residential accounts in 2011 than in 2010.

### Compliance

BCS's primary compliance effort is its informal compliance process. This process provides utilities with specific examples of apparent problems that may reflect infractions of Commission regulations. Often through the informal process, BCS provides utilities with written clarifications or explanations of Chapter 56 provisions and other Commission regulations and policies. The use of "infraction rate" is intended to help the Commission monitor the duty of electric companies at 66 Pa. C.S. §2807(d) to, at a minimum, maintain customer services under retail competition at the same level of quality as existed prior to the beginning of the Electricity Generation Customer Choice and Competition Act of 1996.

The infraction rates in the table that follows are based on all informal complaints that residential consumers filed with BCS from 2009 through 2011. Infractions identified on complaints involving competition issues are included in the infraction statistics. Appendix H, Table 1, presents detailed information about the infractions identified on 2011 cases to the BCS.

## Commission Infraction Rates Major Electric Distribution Companies

Company	2009	2010	2011
Duquesne	0.06	0.08	0.12
Met-Ed	0.01	0.06	0.09
PECO+	0.04	0.07	0.04
Penelec	0.01	0.03	0.07
Penn Power	0.05	0.06	0.06
PPL	0.02	0.06	0.02
West Penn	0.06	0.11	0.07

+ PECO statistics include electric and gas.

- The infraction rate is the number of informally verified infractions per 1,000 residential customers.
- The infraction rates from 2010 to 2011 for Duquesne, Met-Ed and Penelec increased, while the rates for PECO, PPL and West Penn decreased. Penn Power's rate remained stable.
- Appendix H, Table 1, presents the actual number of infractions for 2011 categorized by infraction category.
- As shown in Appendix H, Table 1, the dispute handling category is noteworthy due to both high volume and high percentage of the total number of infractions.

## 4. Natural Gas Industry

In 2011, the Commission had jurisdiction over 29 natural gas distribution companies (NGDCs). However, the majority of the consumer complaints and payment agreement requests involving the gas industry came from residential customers of the seven major NGDCs: Columbia Gas of Pennsylvania Inc. (Columbia); Equitable Gas Co. (Equitable); National Fuel Gas Distribution Corp. (NFG); Peoples Natural Gas Co. f/k/a Dominion (Peoples); Philadelphia Gas Works (PGW); UGI Utilities Inc. -Gas; and UGI Penn Natural Gas. This chapter will focus exclusively on those seven utilities. As with the electric industry, most of the complaints and payment agreement requests (PARs) dealt with matters covered under 52 Pa. Code, Chapter 56 Standards and Billing Practices for Residential Utility Service or 66 Pa. C.S.A. Chapter 14 Responsible Utility Customer Protection. Generally, those consumer complaints and PARs represent customer appeals to the Commission resulting from the inability of the company and the customer to reach a mutually satisfactory resolution to a dispute or payment negotiation.

The statistics in the tables on the pages that follow depict the performance of each of the seven major gas utilities in 2011. Appendices E through H provide statistics for these utilities from 2010 and 2011.

### Consumer Complaints

During 2011, BCS handled 2,233 consumer complaints from residential customers of the various NGDCs and 78 consumer complaints from residential customers of natural gas suppliers (NGSs). Of these residential complaints, 96 percent (2,153) were from customers of the seven largest NGDCs. For the analyses of the seven major gas companies that appear in this chapter, BCS excluded 12 consumer complaints that involved competition issues.

### Consumer Complaint Categories

After a BCS investigator closes a consumer complaint, the BCS Policy Division reviews the complaint, categorizes it into a specific problem category and enters it into BCS's computerized information system. The BCS data system then aggregates the data from all complaints. The following table shows the percentage of 2011 complaints from residential customers of the seven major gas utilities in each of the 13 categories used by the BCS policy unit to categorize consumer complaints about electric, gas and water utilities. Appendix E, Table 2, provides the actual number of cases that fell into each category in 2011.

## Consumer Complaint Categories\*: 2011 Major Natural Gas Distribution Companies

Categories	Columbia	Equitable	NFG	Peoples	PGW+	UGI-Gas	UGI Penn Natural	Gas Majors
Billing Disputes	16%	12%	4%	14%	30%	14%	17%	20%
Personnel Problems	20%	27%	21%	15%	14%	21%	15%	17%
Discontinuance/Transfer	8%	10%	13%	9%	17%	9%	11%	13%
Metering	13%	5%	19%	10%	15%	3%	0%	11%
Other Payment Issues	7%	7%	15%	13%	8%	8%	3%	8%
Credit and Deposits	1%	5%	2%	6%	2%	18%	25%	6%
Scheduling Delays	5%	2%	4%	9%	5%	3%	2%	5%
Damages	8%	2%	6%	9%	1%	4%	2%	4%
Service Quality	8%	4%	8%	7%	<1%	4%	3%	4%
Service Extensions	2%	4%	0%	2%	1%	2%	3%	2%
Service Interruptions	1%	0%	0%	2%	1%	2%	2%	1%
Rates	1%	1%	0%	1%	<1%	0%	2%	<1%
All Other Problems	11%	21%	7%	3%	7%	13%	15%	10%
<b>Total-Number**</b>	<b>181</b>	<b>131</b>	<b>95</b>	<b>171</b>	<b>563</b>	<b>140</b>	<b>115</b>	<b>1,396</b>

\* Columns may total more or less than 100 percent due to rounding.

\*\* Based on residential complaints evaluated by BCS as of May 27, 2012.

+ PGW statistics are based on a probability sample of cases.

- Categories are for all residential complaints filed with BCS, whether they were found to be justified. See Appendix D-1 for an explanation of complaint categories and Appendix E, Table 2, for the number of cases in each category.
- In 2011, billing disputes generated 20 percent of the complaints about the major gas companies followed by personnel problems (17 percent). Complaints about discontinuance/transfer accounted for 13 percent of residential consumer complaints about the major gas companies.

## 2011 Residential Consumer Complaint Rates/ Justified Consumer Complaint Rates Major Natural Gas Distribution Companies

Company	Consumer Complaint Rate	Justified Consumer Complaint Rate
Columbia	0.61	0.06
Equitable	0.70	0.06
NFG	0.58	0.04
Peoples	0.65	0.14
PGW	2.34	0.29*
UGI-Gas	0.56	0.03
UGI Penn Natural	0.91	0.11
<b>Average</b>	<b>0.91</b>	<b>0.10</b>

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

- The consumer complaint rate equals the number of consumer complaints for each 1,000 residential customers. The justified consumer complaint rate equals the number of justified consumer complaints for each 1,000 residential customers.
- In 2011, the average of the consumer complaint rates is more than nine times the average of the justified consumer complaint rates for the seven major gas companies.
- Appendix F, Table 2, presents the number of consumer complaints, the consumer complaint rate, the number of justified consumer complaints and the justified consumer complaint rate for each major gas company in 2010 and 2011.

## 2010-11 Justified Residential Consumer Complaint Rates Major Natural Gas Distribution Companies

Company	2010	2011
Columbia	0.08	0.06
Equitable	0.09	0.06
NFG	0.09	0.04
Peoples	0.15	0.14
PGW*	0.20	0.29
UGI-Gas	0.10	0.03
UGI Penn Natural	0.17	0.11
<b>Average</b>	<b>0.12</b>	<b>0.10</b>

\* Based on a probability sample of cases.

- The justified consumer complaint rate equals the number of justified consumer complaints for each 1,000 residential customers.
- In 2011, six of the major gas companies had justified consumer complaint rates lower than their justified consumer complaint rates in 2010. The justified consumer complaint rate for PGW increased by 45 percent in 2011.
- The justified consumer complaint rates among the major gas companies ranged from a low of 0.03 for UGI-Gas to a high of 0.29 for PGW in 2011. Overall, the industry average justified consumer complaint rate decreased from 0.12 in 2010 to 0.10 in 2011.
- Appendix F, Table 2, presents the number of consumer complaints, the consumer complaint rate, the number of justified consumer complaints and the justified consumer complaint rate for each major gas company in 2010 and 2011.



**2010-11 Response Time to BCS  
Residential Consumer Complaints  
Major Natural Gas Distribution Companies**

Company	Number of Days 2010	Number of Days 2011	Change in Days 2010 to 2011
Columbia	7.0	7.3	0.3
Equitable	3.5	2.9	-0.6
NFG	10.3	7.0	-3.3
Peoples	6.1	13.4	7.3
PGW	12.3	11.7	-0.6
UGI-Gas	36.9	4.9	-32.0
UGI Penn Natural	31.5	4.6	-26.9
<b>Average</b>	<b>15.4</b>	<b>7.4</b>	<b>-8.0</b>

- Beginning in 2007, the calculation for average response time includes all residential consumer complaints for the major gas companies. In prior years, BCS used only the response times for evaluated consumer complaints in this calculation.
- The average of response times for the major gas companies decreased from 15.4 days in 2010 to 7.4 days in 2011.
- Consumer complaint response time performance varied among the major gas companies in 2011, from a low of 2.9 days for Equitable to a high of 13.4 days for Peoples.

### Payment Agreement Requests

In 2011, BCS handled 11,160 payment agreement requests (PARs) from residential customers of the natural gas distribution companies (NGDCs). There were two PARs from residential customers of Pennsylvania's natural gas supply companies. Ninety-seven percent (10,780) of the residential PARs were from customers of the seven major natural gas distribution companies. In 2011, BCS reviewed a representative sample of the PARs for case outcome for all the major gas companies except Peoples. Thus, the calculation for justified payment agreement request rate that appears in the pages that follow is based on a subset of cases that BCS received from customers of these utilities. BCS believes that the size of the samples gives an adequate indication of the performance of these companies. Appendix G, Table 2, provides additional statistics regarding the payment agreement requests from residential customers of the major natural gas distribution companies.

**2011 Residential Payment Agreement Request (PAR) Rates/  
Justified PAR Rates\*  
Major Natural Gas Distribution Companies**

Company	PAR Rate	Justified PAR Rate
Columbia	2.25	0.01
Equitable	5.09	0.05
NFG	2.82	0.08
Peoples	1.13	0.05
PGW	6.79	0.18
UGI-Gas	8.75	0.19
UGI Penn Natural	12.48	0.19
<b>Average</b>	<b>5.62</b>	<b>0.11</b>

\* Justified PAR rates based on a probability sample of cases for all NGDCs except Peoples.

- The PAR rate equals the number of PARs for each 1,000 residential customers. The justified PAR rate equals the number of justified PARs for each 1,000 residential customers.
- On average, there were more than five PARs to BCS for each 1,000 residential customers of the major NGDCs in 2011. There was less than one justified PAR for each 1,000 residential customers.
- The implementation of Chapter 14 had an impact on the 2011 PAR rates and justified PAR rates.
- Appendix G, Table 2, presents the number of PARs, the PAR rate, the number of justified PARs and the justified PAR rate for each major gas company in 2010 and 2011.

## 2010-11 Justified Residential Payment Agreement Request (PAR) Rates\* Major Natural Gas Distribution Companies

Company	2010	2011
Columbia	0.04	0.01
Equitable	0.13	0.05
NFG	0.26	0.08
Peoples	0.12	0.05
PGW	0.28	0.18
UGI-Gas	0.24	0.19
UGI Penn Natural	1.22	0.19
<b>Average</b>	<b>0.33</b>	<b>0.11</b>

\* Based on a probability sample of cases for all NGDCs except Peoples.

- The justified PAR rate equals the number of justified PARs for each 1,000 residential customers.
- The average of the justified PAR rates for the seven major gas utilities decreased from 0.33 in 2010 to 0.11 in 2011. Five of the seven major gas companies had significant decreases in their justified PAR rates, the greatest of which was UGI Penn Natural by 84 percent.
- The 2011 justified PAR rates among the major NGDCs ranged from a low of 0.01 for Columbia to a high of 0.19 for UGI-Gas and UGI Penn Natural.
- The implementation of Chapter 14 had an impact on the 2010 and 2011 justified PAR rates.
- Appendix G, Table 2, presents the number of PARs, the PAR rate, the number of justified PARs and the justified PAR rate for each major gas company in 2010 and 2011.

**2010-11 Response Time to BCS  
Residential Payment Agreement Requests (PARs)  
Major Natural Gas Distribution Companies**

Company	Number of Days 2010	Number of Days 2011	Change in Days 2010 to 2011
Columbia	3.3	2.8	-0.5
Equitable	1.9	1.4	-0.5
NFG	4.1	2.9	-1.2
Peoples	4.6	6.8	2.2
PGW	5.3	5.8	0.5
UGI-Gas	15.9	1.6	-14.3
UGI Penn Natural	10.2	1.4	-8.8
<b>Average</b>	<b>6.5</b>	<b>3.2</b>	<b>-3.3</b>

- Beginning in 2007, the calculation for average response time includes all residential PARs for the major gas companies. In prior years, BCS used only the response times for evaluated PARs in this calculation.
- From 2010 to 2011, the average of response times decreased by 3.3 days. The response time for UGI-Gas fell by more than 14 days from 2010 to 2011.
- The 2011 PAR response times for the major NGDCs varied from a low of 1.4 days for Equitable and UGI Penn Natural to a high of 6.8 days for Peoples.

### Termination and Reconnection of Service

Each month, the gas utilities report to the Commission the number of residential accounts that they terminated for nonpayment during the previous month. They also report the number of previously terminated residential accounts that they reconnected during the month. Historically, utilities have shown a varied pattern of termination behavior, from a consistent pattern to one that fluctuates from year to year. The number of reconnections varies from year to year and from company to company depending on a variety of factors. The NGDC reconnects a customer's terminated service either when a customer pays his/her debt in full or makes a significant payment on the debt and agrees to a payment agreement for the balance owed to the company. The tables that follow indicate the annual number of residential accounts each of the seven largest gas utilities terminated and reconnected in 2009, 2010 and 2011. The first table also presents the termination rates for each of these companies.

## Residential Service Terminations/Termination Rates Major Natural Gas Distribution Companies

Company	Residential Service Terminations				Termination Rates		
	2009	2010	2011	% Change 2010-11	2009	2010	2011
Columbia	11,662	9,878	9,650	-2%	3.14	2.65	2.58
Equitable	10,836	10,967	10,471	-5%	4.52	4.61	4.36
NFG	12,290	9,296	9,472	2%	6.22	4.70	4.77
Peoples	7,640	7,135	3,696	-48%	2.34	2.18	1.12
PGW	38,536	29,865	28,868	-3%	8.01	6.23	6.02
UGI-Gas	14,891	11,885	11,206	-6%	4.92	3.89	3.61
UGI Penn Natural	8,672	8,569	6,967	-19%	5.99	5.93	4.79
<b>Major Gas</b>	<b>104,527</b>	<b>87,595</b>	<b>80,330</b>	<b>-8%</b>			
<b>Average of Rates</b>					<b>5.02</b>	<b>4.31</b>	<b>3.87</b>

- The termination rate is the number of service terminations divided by the number of residential customers, expressed as a percent.
- Overall, the seven major gas companies terminated eight percent fewer residential accounts in 2011 than in 2010.

## Residential Service Reconnections Major Natural Gas Distribution Companies

Company	2009	2010	2011	% Change 2010-11
Columbia	6,559	5,336	4,958	-7%
Equitable	7,392	7,873	7,587	-4%
NFG	8,249	6,445	6,449	<1%
Peoples	4,597	4,602	2,660	-42%
PGW	33,815	30,626	26,011	-15%
UGI-Gas	8,752	6,703	5,426	-19%
UGI Penn Natural	4,871	5,548	4,276	-23%
<b>Major Gas</b>	<b>74,235</b>	<b>67,133</b>	<b>57,367</b>	<b>-15%</b>

- Overall, the seven major NGDCs reconnected 15 percent fewer residential accounts in 2011 than in 2010.

## Compliance

BCS's primary compliance effort is its informal compliance process. This process provides utilities with specific examples of apparent problems that may reflect infractions of Commission regulations. Often through the informal process, BCS provides utilities with written clarifications or explanations of Chapter 56 provisions and other Commission regulations and policies. The use of "infraction rate" is intended to help the Commission monitor the duty of natural gas companies at 66 Pa. C.S. §2206(a) to, at a minimum, maintain customer services under retail competition at the same level of quality as existed prior to the beginning of the Natural Gas Choice and Competition Act of 1999.

The infraction rates in the table that follows are based on the review of all informal complaints that residential consumers filed with BCS from 2009 through 2011. Infractions identified on complaints involving competition issues are included in the infraction statistics. Appendix H, Table 2, presents detailed information about the infractions identified on 2011 cases to the BCS.

### Commission Infraction Rates Major Natural Gas Distribution Companies

Company	2009	2010	2011
Columbia	0.04	0.02	0.03
Equitable	0.13	0.06	0.03
NFG	0.03	0.06	0.02
Peoples	0.14	0.14	0.18
PGW	0.29	0.03	0.16
UGI-Gas	0.08	0.08	0.03
UGI Penn Natural	0.08	0.15	0.08

- The infraction rate is the number of informally verified infractions per 1,000 residential customers.
- From 2010 to 2011, infraction rates decreased for Equitable, NFG, UGI-Gas and UGI Penn Natural while the infraction rates increased for Columbia, Peoples and PGW.
- Appendix H, Table 2, presents the actual number of infractions for 2011 categorized by infraction category.
- As shown in Appendix H, Table 2, the dispute handling category is noteworthy due to both high volume and high percentage of the total number of infractions.

## 5. Water Industry

In 2011, the Commission had jurisdiction over 97 water companies, including 23 municipal water companies. The Commission categorizes the non-municipal water companies into one of three classifications: A, B and C. Those three classifications are based on the amount of the company's annual revenues.

The non-municipal water companies with the largest annual revenues are classified as "Class A" water companies. "Class A" water companies must have annual revenues of \$1 million or more for three years in a row. In 2011, nine "Class A" water companies served residential customers. The number of residential customers for these major companies ranged from 2,346 for United Water Bethel to 588,325 residential customers for Pennsylvania American Water Co. (PAWC). In 2011, the "Class A" water companies were Aqua Pennsylvania Inc. (Aqua), Audubon Water Co., Columbia Water Co., Newtown Artesian Water Co., Pennsylvania American Water Co., Superior Water Co., United Water Bethel, United Water of Pennsylvania Inc. and York Water Co. The tables in this chapter present individual statistics for the two largest water companies, PAWC and Aqua, and for the "Other Class A" companies as a whole.

The other classes of water companies have lower annual revenues and, typically, fewer residential customers. In 2011, 11 "Class B" companies were operating. "Class B" water companies have annual revenues between \$200,000 and \$999,999. In 2011, the number of residential customers for the "Class B" companies ranged from 295 to 3,055. There were 53 "Class C" companies in 2011. "Class C" water companies have annual revenues of less than \$200,000. The number of residential customers for the "Class C" companies ranged from two to 1,148 in 2011.

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

As would be expected, the majority of the residential consumer complaints and payment agreement requests to BCS came from customers of the "Class A" water companies. Most of the complaints and payment agreement requests from water customers dealt with matters covered by 52 Pa. Code, Chapter 56 Standards and Billing Practices for Residential Utility Service or 66 Pa. C.S.A. Chapter 14 Responsible Utility Customer Protection. These consumer complaints and payment agreement requests represent customer appeals to the Commission resulting from the inability of the company and the customer to reach a mutually satisfactory resolution to a dispute or payment negotiation.

The tables on the pages that follow depict the performance of the "Class A" water companies in 2011. Appendices E through H also present statistics about the performance of the "Class A" water companies.

## Consumer Complaints

During 2011, BCS handled a total of 787 consumer complaints from residential customers of the various water companies. Of those complaints, 96 percent (757) were from customers of the “Class A” companies. The remaining 4 percent were from customers of smaller water companies. While a majority of consumer complaints involved the “Class A” water companies in 2011, the Commission devoted a significant amount of attention to the smaller water companies. Sometimes the amount of time BCS spends on a few complaints from customers of a smaller company exceeds the amount of time it spends dealing with complaints filed against one of the larger companies. This is because larger companies typically have the resources to respond appropriately to complaints and payment agreement requests as compared to smaller water companies with limited resources.

In 2011, customers of the small water companies filed complaints with BCS for a variety of reasons. Of the 30 consumer complaints filed about the “Non-Class A” water companies, 67 percent involved complaints about service, including people-delivered service, service quality or other aspects of the companies’ service to customers (20 cases). An additional 23 percent involved billing disputes (7 cases).

## Consumer Complaint Categories

After a BCS investigator closes a consumer complaint, the BCS Policy Division reviews the complaint, categorizes it into a specific problem category and enters it into BCS’s computerized information system. The BCS data system then aggregates the data from all complaints. The following table shows the percentage of 2011 complaints from residential customers of the “Class A” water companies in each of the categories used by the BCS Policy Division to categorize consumer complaints about electric, gas and water companies. Appendix E, Table 3, provides the actual number of cases that fell into each category in 2011.



## Consumer Complaint Categories\*: 2011 Major Water Companies

Categories	Aqua	PAWC	"Other Class A"	All "Class A" Water
Billing Disputes	44%	44%	47%	44%
Personnel Problems	13%	13%	11%	13%
Metering	10%	6%	11%	8%
Damages	5%	8%	0%	7%
Service Quality	6%	4%	5%	5%
Discontinuance/Transfer	4%	3%	5%	4%
Scheduling Delays	3%	3%	16%	4%
Other Payment Issues	2%	2%	0%	2%
Service Interruptions	1%	2%	0%	2%
Service Extensions	2%	1%	0%	1%
Rates	2%	1%	0%	1%
Credit and Deposits	<1%	<1%	0%	<1%
All Other Problems	10%	11%	5%	10%
<b>Total-Number**</b>	<b>242</b>	<b>353</b>	<b>19</b>	<b>614</b>

\* Columns may total more or less than 100 percent due to rounding.

\*\* Based on residential complaints evaluated by BCS as of May 27, 2012.

- Categories are for all residential complaints filed with BCS, whether they were found to be justified. See Appendix D-1 for an explanation of complaint categories and Appendix E, Table 3, for the number of cases in each category.
- Sixty-five percent of residential complaints for the Class A water companies fell into one of three complaint categories: billing disputes, personnel problems or metering complaints. Billing disputes generated the highest number of complaints in 2011.

**2011 Residential Consumer Complaint Rates/  
Justified Consumer Complaint Rates  
Major Water Companies**

Company	Consumer Complaint Rate	Justified Consumer Complaint Rate
Aqua	0.77	0.19
PAWC	0.75	0.15
“Other Class A”	0.16	0.04
<b>Average</b>	<b>0.56</b>	<b>0.13</b>

- The consumer complaint rate equals the number of consumer complaints for each 1,000 residential customers. The justified consumer complaint rate equals the number of justified consumer complaints for each 1,000 residential customers.
- The consumer complaint rate for PAWC is five times greater than its justified consumer complaint rate.
- Appendix F, Table 3, presents the number of consumer complaints, the consumer complaint rate, the number of justified consumer complaints and the justified consumer complaint rate for Aqua, PAWC and the “Other Class A” water companies in 2010 and 2011.

## 2010-11 Justified Residential Consumer Complaint Rates Major Water Companies

Company	2010	2011
Aqua	0.29	0.19
PAWC	0.22	0.15
"Other Class A"	0.04	0.04
<b>Average</b>	<b>0.18</b>	<b>0.13</b>

- The justified consumer complaint rate equals the number of justified consumer complaints for each 1,000 residential customers.
- The justified consumer complaint rates decreased from 2010 to 2011 for both Aqua and PAWC.
- Appendix F, Table 3, presents the number of consumer complaints, the consumer complaint rate, the number of justified consumer complaints and the justified consumer complaint rate for Aqua, PAWC and the "Other Class A" water companies in 2010 and 2011.

## 2010-11 Response Time to BCS Residential Consumer Complaints Major Water Companies

Company	Number of Days 2010	Number of Days 2011	Change in Days 2010 to 2011
Aqua	16.2	14.4	-1.8
PAWC	6.7	3.5	-3.2
"Other Class A"	6.8	19.7	12.9
<b>Average</b>	<b>9.9</b>	<b>12.5</b>	<b>2.6</b>

- Beginning in 2007, the calculation for average response time includes all residential consumer complaints for the "Class A" water companies. In prior years, BCS used only the response times for evaluated consumer complaints in this calculation.
- The average response time for Aqua decreased by 1.8 days from 2010 to 2011. The average response time for PAWC decreased 3.2 days, from 6.7 days in 2010 to 3.5 days in 2011.

### Payment Agreement Requests

In 2011, BCS handled 4,568 payment agreement requests (PARs) from residential customers of the water industry. Ninety-nine percent (4,521) of the residential PARs were from customers of the "Class A" water companies. As in past years, for the companies with the largest volume of requests, the BCS Policy Division reviewed a representative sample of PARs for case outcome. In 2011, BCS reviewed a sample of the PARs for Aqua and PAWC. Thus, the calculation for justified payment agreement request rate that appears in the pages that follow is based on a subset of cases that BCS received from customers of these two companies. BCS believes the size of the sample gives a reasonable indication of the performance of these companies. Appendix G, Table 3, provides additional statistics regarding the payment agreement requests from residential customers of the "Class A" water companies.

## 2011 Residential Payment Agreement Request (PAR) Rates/ Justified PAR Rates Major Water Companies

Company	PAR Rate	Justified PAR Rate
Aqua	3.92	0.16*
PAWC	4.83	0.41*
"Other Class A"	1.31	0.00
<b>Average</b>	<b>3.35</b>	<b>0.19</b>

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

- The PAR rate equals the number of PARs for each 1,000 residential customers. The justified PAR rate equals the number of justified PARs for each 1,000 residential customers.
- On average, there were more than three PARs to BCS for each 1,000 residential customers of the major water companies in 2011. There was less than one justified PAR for each 1,000 residential customers.
- The implementation of Chapter 14 had an impact on the 2011 PAR rates and justified PAR rates.
- Appendix G, Table 3, presents the number of PARs, the PAR rate, the number of justified PARs and the justified PAR rate for Aqua, PAWC and the "Other Class A" water companies in 2010 and 2011.

## 2010-11 Justified Residential Payment Agreement Request (PAR) Rates Major Water Companies

Company	2010	2011
Aqua	0.26*	0.16*
PAWC	0.97*	0.41*
“Other Class A”	0.02	0.00
<b>Average</b>	<b>0.42</b>	<b>0.19</b>

\* Based on a probability sample of cases.

- The justified PAR rate equals the number of justified PARs for each 1,000 residential customers.
- The justified PAR rates decreased from 2010 to 2011 for Aqua and PAWC.
- The implementation of Chapter 14 had an impact on the 2010 and 2011 justified PAR rates.
- Appendix G, Table 3, presents the number of PARs, the PAR rate, the number of justified PARs and the justified PAR rate for Aqua, PAWC and the “Other Class A” water companies in 2010 and 2011.

**2010-11 Response Time to BCS  
Residential Payment Agreement Requests (PARs)  
Major Water Companies**

Company	Number of Days 2010	Number of Days 2011	Change in Days 2010 to 2011
Aqua	6.0	7.0	1.0
PAWC	6.7	1.8	-4.9
"Other Class A"	7.1	2.8	-4.3
<b>Average</b>	<b>6.6</b>	<b>3.9</b>	<b>-2.7</b>

- Beginning in 2007, the calculation for average response time includes all residential PARs for the "Class A" water companies. In prior years, BCS used only the response times for evaluated PARs in this calculation.
- Aqua's response time increased by one day from 2010 to 2011 while PAWC's response time decreased by nearly five days, from 6.7 to 1.8 days in 2011.

## Compliance

BCS's primary compliance effort is its informal compliance process. This process provides utilities with specific examples of apparent problems that may reflect infractions of Commission regulations. Often, through the informal notification process, BCS provides utilities with written clarifications or explanations of Chapter 56 provisions and other Commission regulations and policies.

The infraction rates in the table that follows are based on the review of all informal complaints that residential consumers filed with BCS from 2009 through 2011. Appendix H, Table 3, presents detailed information about the infractions identified on 2011 cases to the BCS.

## Commission Infraction Rates Major Water Companies

Company	2009	2010	2011
Aqua	0.38	0.20	0.21
PAWC	0.37	0.32	0.13
"Other Class A"	0.00	0.01	0.02

- The infraction rate is the number of informally verified infractions per 1,000 residential customers.
- The infraction rates for Aqua and "Other Class A" water companies increased slightly from 2010 to 2011. The infraction rate for PAWC dropped significantly to 0.13 in 2011.
- Appendix H, Table 3, presents the actual number of infractions for 2011 categorized by infraction category.
- As shown in Appendix H, Table 3, the dispute handling category is noteworthy due to both high volume and high percentage of the total number of infractions.

### Programs That Assist Low-Income Customers

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

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

Helping Hand is for customers at or below 200 percent of the federal poverty level. On April 1, 2009, in recognition of the current economic climate, the company eased the remaining minimum requirements. The company reduced the minimum past amount due from \$150 to \$110, and the minimum number of days past due from 30 to 21.

Each household enrolled in the Helping Hand program receives a plumbing inspection, including minor repairs, and/or a conservation kit, containing water saving devices. The customer also receives water usage and conservation information. Customers who make their payments on time and in full receive a credit of \$10 per month applied to their arrearage.

At the end of 2011, 947 active participants were enrolled in the Helping Hand program. During the year, Aqua spent \$146,221 to complete eligibility interviews and household audits. In addition, the company provided \$40,340 in arrearage forgiveness credits to 1,162 program participants.



Pennsylvania American Water Co. (PAWC) – In 1991, PAWC established the “Help to Others” (H2O) program. The H2O program provides customers with a 65 percent discount on their monthly service fees – a savings of about \$8.94 per month. The program also provides water saving devices and conservation education. As of December 2010, 11,630 customers were receiving the discounted rate. (As of December 2011, 12,554 customers were receiving the discount for water.)

In addition to a discount for water, the company also offers a discount for wastewater customers in Coatesville, Bushkill, Lehman Pike, Claysville, Clarion, East Stroudsburg, Blue Mountain and Winona Lakes. This discount offers a 15 percent discount off the total wastewater billing for those who qualify. As of December 2011, 311 customers were receiving the discount for wastewater.

As part of the H2O program, PAWC also participates with the Dollar Energy Fund to provide cash grants of up to \$500 per year for those water and wastewater customers listed above. Dollar Energy Fund is a hardship fund administrator that provides cash assistance to utility customers who need help in paying their utility bills. During the 2010-11 program year, PAWC’s shareholders and customers provided \$314,073 in hardship fund benefits to 1,149 customers for an average benefit of \$273. In addition, PAWC’s shareholders provided \$10,000 for the 2010-11 program year for their wastewater customers.

United Water of Pennsylvania Inc. (United Water) - United Water implemented the “UW Cares” program in 2005. UW Cares is a nonprofit 501(c)(3) organization that provides financial assistance to customers who experience a temporary financial crisis caused by such occurrences as a job loss, severe illness, casualty or extensive military service. Cash grants up to \$100 are provided to qualifying customers who are first screened by the Salvation Army for eligibility. To be eligible for a grant, customers must have made a nominal payment within the last 90 days. During the 2010-11 program year, the company provided grants totaling nearly \$5,200 to qualifying customers.

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

During 2011, the company expended \$1,631 for customer plumbing repairs and enrolled a total of 17 new customers in the York Water Cares program. As of program end 2011, 34 customers received arrearage forgiveness benefits totaling \$1,755 for an average benefit of approximately \$52 per customer. The company anticipates an annual savings of \$3,468 in costs for termination proceedings that may be avoided as a result of customer participation in the York Water Cares program.

## 6. Telephone Industry

During 2011, BCS handled consumer complaints, payment agreement requests (PARs) and inquiries from the customers of a variety of telecommunications service providers, including incumbent local exchange carriers (ILECs), competitive local exchange carriers (CLECs), long-distance companies and resellers. Just over 700 providers of telecommunications services were certificated and able to conduct business in Pennsylvania in 2011. Of this group of telecommunications providers, 37 were ILECs. Thirty-two of these ILECs were non-major utilities each serving fewer than 50,000 residential customers. The remaining five ILECs were major companies, each with more than 50,000 residential customers. Collectively, these five major telephone companies served nearly 2.4 million residential customers in 2011.

This chapter will focus exclusively on the five major ILECs in 2011 – CenturyLink f/k/a Embarq Pennsylvania (CenturyLink); Frontier Communications Commonwealth Telephone Co. f/k/a Commonwealth Telephone Co. (Frontier Commonwealth); Verizon North Inc. (Verizon North); Verizon Pennsylvania (Verizon PA); and Windstream Communications f/k/a ALLTEL Pennsylvania (Windstream). Prior reports included data about RCN Telecom Services, Inc. However, in this year's report, RCN is not included in this chapter because the company reported it served fewer than 50,000 residential customers during 2011.

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

### Consumer Complaints

Although BCS handled consumer complaints about different types of telecommunications service providers in 2011, the complaints predominantly came from the residential customers of the five major ILECs. Overall, BCS handled 3,412 consumer complaints from residential customers of telecommunications service providers in 2011. Of those complaints, 3,179 were from residential customers of all of Pennsylvania's ILECs while 3,129 were from customers of the five major ILECs. Meanwhile, 205 consumer complaints were from residential customers of the CLECs operating in Pennsylvania. The remaining 28 consumer complaints were from residential customers of other providers of telecommunications services such as long-distance carriers, resellers and Voice over Internet Protocol (VoIP) providers.

In September 2009, BCS began offering all Verizon PA and Verizon North customers who call with a service issue the voluntary option of being transferred to a special Verizon team that immediately begins working to resolve the customer's complaint. If a customer chooses the voluntary transfer, BCS categorizes the contact as an "inquiry"<sup>3</sup> rather than as a "consumer complaint."

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<sup>3</sup>BCS categorized 1,415 of these contacts regarding Verizon service issues as inquiries during 2011.

## Consumer Complaint Categories

After a BCS investigator closes a consumer complaint, the BCS Policy Division reviews the complaint, categorizes it into a specific problem category and enters it into the Bureau's computerized information system. The BCS data system then aggregates the data from all complaints. The following table shows the percentage of 2011 consumer complaints from residential customers of the major telephone companies in each of the 11 categories used by the BCS policy unit to categorize consumer complaints about telephone companies.

### Consumer Complaint Categories\*: 2011 Major Local Telephone Companies

Categories	Century-Link	Frontier Commonwealth	Verizon North	Verizon PA	Wind-stream	Telephone Majors
Unsatisfactory Service	19%	27%	24%	27%	35%	27%
Billing Disputes	38%	22%	22%	27%	18%	27%
Service Delivery	13%	23%	29%	22%	23%	22%
Service Terminations	8%	6%	7%	7%	11%	7%
Competition	3%	12%	5%	3%	2%	4%
Toll Services	8%	1%	3%	1%	0%	1%
Credit and Deposits	1%	2%	2%	1%	2%	1%
Discontinuance/Transfer	1%	3%	2%	1%	0%	1%
Non-Recurring Charges	0%	0%	1%	<1%	3%	<1%
Annoyance Calls	0%	0%	0%	<1%	0%	<1%
All Other Problems	8%	3%	7%	10%	6%	10%
<b>Total-Number**</b>	<b>89</b>	<b>86</b>	<b>119</b>	<b>1,467</b>	<b>65</b>	<b>1,826</b>

\* Columns may total more or less than 100 percent due to rounding.

\*\* Based on residential complaints evaluated by BCS as of April 27, 2012.

- Categories are for all residential complaints filed with BCS, whether they were found to be justified. See Appendix D-2 for an explanation of complaint categories and Appendix E, Table 4, for the number of cases in each category.
- Seventy-six percent of all complaints for the major telephone companies fall into one of three complaint categories: unsatisfactory service, billing disputes or service delivery.
- Unsatisfactory service and billing disputes each account for 27 percent of the total number of consumer complaints filed against the five major telephone companies in 2011. Last year, unsatisfactory service accounted for 18 percent, while billing disputes accounted for 34 percent of all consumer complaints filed against the major telephone companies.

- Service delivery accounts for another 22 percent of all the consumer complaints filed against the five major telephone companies in 2011.

The 2010 and 2011 consumer complaint figures for justified consumer complaint rates and response times for each of the major telephone companies are presented on the following pages. Appendix F, Table 4, provides additional statistics about the consumer complaints from residential customers of the five major local telephone companies.

### 2011 Residential Consumer Complaint Rates/ Justified Consumer Complaint Rates Major Local Telephone Companies

Company	Consumer Complaint Rate	Justified Consumer Complaint Rate
CenturyLink	0.55	0.25
Frontier Commonwealth	0.63	0.41
Verizon North	0.47	0.25
Verizon PA	1.64	0.92*
Windstream	0.56	0.27
<b>Average</b>	<b>0.77</b>	<b>0.42</b>

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

- The consumer complaint rate equals the number of consumer complaints for each 1,000 residential customers. The justified consumer complaint rate equals the number of justified consumer complaints for each 1,000 residential customers.
- For the five major telephone companies, the average of their consumer complaint rates is 1.8 times greater than the average of their justified consumer complaint rates.
- The consumer complaint rates for CenturyLink and Windstream are more than double their justified consumer complaint rates.
- Appendix F, Table 4, presents the number of consumer complaints, the consumer complaint rate, the number of justified consumer complaints and the justified consumer complaint rate for each major telephone company in 2010 and 2011.

## 2010-11 Justified Residential Consumer Complaint Rates Major Local Telephone Companies

Company	2010	2011
CenturyLink	0.16	0.25
Frontier Commonwealth	0.30**	0.41
Verizon North	0.21	0.25
Verizon PA*	0.72	0.92
Windstream	0.21	0.27
<b>Average</b>	<b>0.32</b>	<b>0.42</b>

\* Based on a probability sample of cases.

\*\* BCS revised the 2010 justified consumer complaint rate for Frontier Commonwealth. It was discovered that a submission error was made when reporting the 2010 number of residential customers to BCS.

- The justified consumer complaint rate equals the number of justified consumer complaints for each 1,000 residential customers.
- The industry average of justified consumer complaint rates increased by 31 percent from 2010 to 2011. All five major telephone companies had an increase in their justified consumer complaint rate in 2011. CenturyLink and Frontier Commonwealth had the largest increases. CenturyLink's justified consumer complaint rate increased 56 percent, while Frontier Commonwealth's justified consumer complaint rate increased 37 percent since 2010.
- Of the five major telephone companies, only Verizon PA had a justified consumer complaint rate that was higher than the industry average.
- Appendix F, Table 4, presents the number of consumer complaints, the consumer complaint rate, the number of justified consumer complaints and the justified consumer complaint rate for each major telephone company in 2010 and 2011.

## 2010-11 Response Time to BCS Residential Consumer Complaints Major Local Telephone Companies

Company	Number of Days 2010	Number of Days 2011	Change in Days 2010 to 2011
CenturyLink	19.0	22.4	3.4
Frontier Commonwealth	25.5	14.1	-11.4
Verizon North	21.1	19.1	-2.0
Verizon PA	18.6	18.6	0.0
Windstream	20.3	18.9	-1.4
<b>Average</b>	<b>20.9</b>	<b>18.6</b>	<b>-2.3</b>

- For the five major telephone companies, the average response time to consumer complaints decreased by 2.3 days from 2010 to 2011.
- The response time for Frontier Commonwealth decreased by more than 11 days. Only CenturyLink increased their average response time from 2010 to 2011.

### Payment Agreement Requests

Telephone service consists of three components: basic service, nonbasic service and toll service. BCS does not handle customer requests for payment agreements that involve toll or nonbasic services. For the telephone industry, payment agreement requests (PARs) are principally contacts to BCS or to companies involving a request for payment terms for arrearages associated with basic service. Most PARs are cases relating to the suspension of basic telephone service for nonpayment. Suspension of basic telephone service involves the temporary cessation of service without the consent of the customer and occurs when the customer owes the local telephone company money. If the customer does not pay or make an agreement to pay the amount owed, the company proceeds to terminate the customer's service, which is the permanent cessation of service. The majority of PARs are from customers who contact BCS to request payment agreements after they have received a suspension notice.

Under Chapter 64, a customer contact in response to a suspension notice is a dispute (as the term is defined in §64.2) only if the contact includes a disagreement with respect to the application of a provision of Chapter 64. Where telephone cases involving telephone service suspension are concerned, failure to negotiate a payment agreement does not in itself mean that a dispute exists. Consequently, in this report, telephone cases that involve PARs have been separated from telephone PARs that also involve a dispute. For the telephone industry, PARs that involve a dispute are classified as consumer complaints. During 2011, BCS handled 460 PARs from residential customers of telecommunications service providers. Of these PARs, 394 were from residential customers of the five major telephone companies: CenturyLink, Frontier Commonwealth, Verizon North, Verizon PA and Windstream.

As previously mentioned, BCS has used sampling over the years to evaluate the large volume of cases it receives from customers of the largest major companies. Given the large volume of PARs from Verizon PA customers, BCS evaluated a representative sample of the company's PARs to determine justified rate and response time. BCS believes that the size of the sample gives a reasonable indication of the company's performance.

The 2010 and 2011 payment agreement request figures for justified payment agreement request rates and response times for the major telephone companies are presented in the tables that follow.

### 2011 Residential Payment Agreement Request (PAR) Rates/ Justified PAR Rates Major Local Telephone Companies

Company	PAR Rate	Justified PAR Rate
CenturyLink	0.15	0.02
Frontier Commonwealth	0.06	0.01
Verizon North	0.07	0.01
Verizon PA	0.20	0.01*
Windstream	0.07	0.02
<b>Average</b>	<b>0.11</b>	<b>0.01</b>

\* Justified PAR rate based on a probability sample of cases.

- The PAR rate equals the number of PARs for each 1,000 residential customers. The justified PAR rate equals the number of justified PARs for each 1,000 residential customers.
- The overall 2011 PAR rate is 11 times the overall justified PAR rate for the five major telephone companies.
- For the individual companies, the ratio between the PAR rate and the justified PAR rate varies. For Verizon North, the company's 2011 PAR rate is 20 times the company's justified PAR rate.
- Appendix G, Table 4, presents the number of PARs, the PAR rate, the number of justified PARs and the justified PAR rate for each major telephone company in 2010 and 2011.

## 2010-11 Justified Residential Payment Agreement Request (PAR) Rates Major Local Telephone Companies

Company	2010	2011
CenturyLink	0.00	0.02
Frontier Commonwealth	0.03	0.01
Verizon North	0.01	0.01
Verizon PA*	0.04	0.01
Windstream	0.03	0.02
<b>Average</b>	<b>0.02</b>	<b>0.01</b>

\* Based on a probability sample of cases.

- The justified PAR rate equals the number of justified PARs for each 1,000 residential customers.
- The 2011 average justified PAR rate for the five major telephone companies decreased from 0.02 in 2010 to 0.01 in 2011. Only CenturyLink had a justified PAR rate that increased from 2010 to 2011. The justified PAR rate for Verizon North remained stable at 0.01.
- Appendix G, Table 4, presents the number of PARs, the PAR rate, the number of justified PARs and the justified PAR rate for each major telephone company in 2010 and 2011.



**2010-11 Response Time to BCS  
Residential Payment Agreement Requests (PARs)  
Major Local Telephone Companies**

<b>Company</b>	<b>Number of Days 2010</b>	<b>Number of Days 2011</b>	<b>Change in Days 2010 to 2011</b>
CenturyLink	3.4	14.4	11.0
Frontier Commonwealth	21.5	6.1	-15.4
Verizon North	11.9	8.5	-3.4
Verizon PA	13.6	11.4	-2.2
Windstream	11.9	18.5	6.6
<b>Average</b>	<b>12.5</b>	<b>11.8</b>	<b>-0.7</b>

- The average response time to PARs for the five major telephone companies decreased from 12.5 days in 2010 to 11.8 days in 2011.
- Frontier Commonwealth reduced their response time to PARs by more than 15 days from 2010 to 2011.

### Termination of Service

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

## Residential Service Terminations/Termination Rates Major Local Telephone Companies

Company	Residential Service Terminations				Termination Rates		
	2009	2010	2011	% Change 2010-11	2009	2010	2011
CenturyLink	7,128	6,468	5,136	-21%	36.30	35.19	30.13
Frontier Commonwealth	1,128	408*	552	35%	7.35	3.21*	4.08
Verizon North	23,364	11,412	7,056	-38%	71.45	39.18	27.14
Verizon PA	160,452	171,648	136,572	-20%	73.04	88.30	80.82
Windstream	4,308	3,984	3,648	-8%	31.43	31.63	30.88
<b>Major Telephone</b>	<b>196,380</b>	<b>193,920</b>	<b>152,964</b>	<b>-21%</b>			
<b>Average of Rates</b>					<b>43.91</b>	<b>39.50</b>	<b>34.61</b>

\* BCS revised the 2010 number of residential service terminations and termination rate for Frontier Commonwealth. It was discovered a submission error was made when reporting the 2010 number of residential customers and 2010 number of terminations to BCS.

- The termination rate equals the number of basic service terminations for each 1,000 residential customers.
- Overall, the average residential service termination rate for the major telephone companies decreased from 2010 to 2011.
- From 2010 to 2011, the number of terminations and the termination rates decreased for four of the five major telephone companies. Only Frontier Commonwealth had an increase in their number of terminations and their termination rate from 2010 to 2011.

## Compliance

BCS's primary compliance effort is the informal compliance process. Through informal compliance notifications, this process provides companies with specific examples of apparent problems that may reflect infractions of the Commission's Standards and Billing Practices for Residential Telephone Service (Chapter 64) and the telephone regulations for quality of service (Chapter 63). The informal notification process also enables BCS to provide companies with written clarifications and explanations of Chapter 63 and Chapter 64 provisions and BCS policies. The informal compliance process is specifically designed to identify systemic errors. Companies can then investigate the scope of the problem and take corrective action. Appropriate corrective action usually involves modifying a computer program; revising the text of a notice, a billing or a letter; changing a company procedure; or providing additional staff training to ensure the proper implementation of a sound procedure.

Each year, BCS retrieves infraction data from the BCS Compliance Tracking System and produces tables that present Chapter 63 and Chapter 64 infraction statistics for the major telephone companies reviewed in this chapter. The infraction statistics are typically drawn from all cases that residential consumers filed with BCS in 2009, 2010 and 2011. Appendix H, Tables 4 and 5, present detailed information about the infractions identified on 2011 cases to the BCS.

### Commission Infraction Rates – Chapter 63 Major Local Telephone Companies

Company	2009	2010	2011
CenturyLink	0.02	0.14	0.22
Frontier Commonwealth	0.20	0.19	0.60
Verizon North	0.58	0.26	0.52
Verizon PA	1.31	0.98	1.87
Windstream	0.17	0.17	0.18

- The infraction rate is the number of informally verified infractions per 1,000 residential customers.
- Infraction rates increased for each of the five major telephone companies since 2010. In 2011, Frontier Commonwealth's infraction rate was more than three times higher than in 2010. The infraction rate for Windstream remained relatively stable from 2010 to 2011.
- Appendix H, Table 4, presents the actual number of infractions of Chapter 63 found on 2011 informal complaints for the major local telephone companies by infraction category.

## Commission Infraction Rates – Chapter 64 Major Local Telephone Companies

Company	2009	2010	2011
CenturyLink	0.18	0.24	0.56
Frontier Commonwealth	0.14	0.64	0.61
Verizon North	0.22	0.29	0.22
Verizon PA	0.73	0.63	0.70
Windstream	0.13	0.41	0.36

- The infraction rate is the number of informally verified infractions per 1,000 residential customers.
- Infraction rates decreased for three of the five major telephone companies in 2011. Only CenturyLink and Verizon PA had infraction rates higher in 2011 than in 2010. CenturyLink's 2011 infraction rate was more than double its infraction rate for 2010.
- Appendix H, Table 5, presents the actual number of infractions of Chapter 64 found on 2011 informal complaints for the major local telephone companies by infraction category.

### Universal Service Programs

As part of its ongoing responsibilities, BCS monitors the universal service programs of local telephone companies. For the telephone industry, universal service programs<sup>4</sup> include Link-Up America (Link-Up), Lifeline Service (Lifeline) and the Universal Telephone Assistance Program (UTAP). These programs ensure that low-income consumers have access to telephone service by providing discounts or credits for service installation and basic telephone service. The Commission approved the implementation of Pennsylvania's first universal service program in 1989 with the implementation of Link-Up. By December 1997, the Commission approved Lifeline service plans for 44 telephone companies and marked the statewide implementation of telephone companies' Lifeline programs in 1998.

The initial Lifeline program targeted those customers who had incomes at or below 100 percent of the federal poverty guidelines, who received Supplemental Security Income or who participated in certain Pennsylvania Department of Public Welfare (DPW) programs. Lifeline service customers could not subscribe to call waiting or other optional services<sup>5</sup>.

On Sept. 30, 1999, the Commission approved a Global Telecommunication Order that created the Lifeline 150 program. Under the Lifeline 150 program, customers were allowed to subscribe to one optional service such as voice mail or call waiting at cost. Customers with incomes up to 150 percent of the federal poverty guidelines and who participated in

<sup>4</sup>With the exception of UTAP, these programs are supported fully or in part by federal universal service funds.

<sup>5</sup>Lifeline service customers were permitted to subscribe to call trace service under special circumstances.

certain assistance programs<sup>6</sup> were eligible for this program. The Commission directed telephone companies to discontinue the initial Lifeline program and implement the Lifeline 150 program. However, the Commission allowed Verizon f/k/a Bell of PA to continue its 1999 Lifeline program along with implementing the Lifeline 150 program. As a result of the merger of Bell Atlantic PA and GTE North, Verizon North f/k/a GTE North also is required to offer Lifeline service.

On March 2, 2012, the FCC issued a Final Rule which reformed and begins to modernize the Universal Service Fund's Lifeline program. The reforms substantially strengthen protections against waste, fraud and abuse; improve program administration and accountability; improve enrollment and consumer disclosures; initiate modernization of the program for broadband; and constrain the growth of the program in order to reduce the burden of all who contribute to the Universal Service Fund. In addition, the FCC has identified numerous unserved census block groups in Pennsylvania where wireless eligible telecommunications carriers (ETCs) may bid to receive Mobility Fund Phase 1 support to build infrastructure over which to deliver 3G or better broadband and voice service.

The discussion below describes the status of universal service programs for the telephone industry in 2011, prior to the implementation of the FCC's reforms.

### Lifeline, Lifeline 150 and Lifeline 135 Service

On May 23, 2005, the Commission entered its Final Lifeline Order (Final Order), at Docket No. M-00051871 that resulted in major changes to the Lifeline programs. The Final Order expanded the Lifeline and Link-Up program eligibility to be consistent with the Federal Communications Commission's (FCC) default Lifeline/Link-Up programs<sup>7</sup>. It added the National School Free Lunch Program and an income-only based criterion (income at or below 135 percent of the federal poverty guidelines) as new criteria for Pennsylvania's Lifeline/Link-Up program eligibility. Second, the Final Order directed all jurisdictional ETCs<sup>8</sup> to implement the Lifeline provisions contained in Chapter 30. Under these provisions<sup>9</sup>, ETCs are to inform new and existing customers about the availability of Lifeline and Link-Up services. They also must permit eligible Lifeline service customers to purchase any number of optional services (i.e. call waiting) at the tariffed rates for these services. Third, the Final Order requires all local telephone ETCs to implement these changes. It also encourages non-ETCs to continue to offer Lifeline service even though they are no longer required to do so. Finally, the Final Order eliminates the Lifeline 150 program and designates the Lifeline 135 program as the primary telephone universal service program in Pennsylvania.

On Dec. 18, 2008, the Commission adopted the initial decision of a PUC administrative law judge ordering Verizon PA and Verizon North to revise their tariffs to permit their Lifeline

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<sup>6</sup>These programs are as follows: General Assistance (GA); Supplemental Security Income (SSI); Temporary Assistance for Needy Families (TANF); Food Stamps; Low-Income Home Energy Assistance Program (LIHEAP); Medicaid; Federal Public Housing Assistance; and the State Blind Pension.

<sup>7</sup>FCC Report and Order and Further Notice of Proposed Rulemaking in the Matter of Lifeline and Link-Up, at CC Docket No. 04-87, WC Docket No. 03-109.

<sup>8</sup>To provide Lifeline and Link-Up services, telephone companies must be designated Eligible Telecommunications Carriers (ETC) by their state commission or the FCC. ETCs may receive universal service funding.

<sup>9</sup>66 Pa. C.S. §§ 30 (f)(1-4). These rules apply to all Pennsylvania incumbent local exchange carriers and three competitive local exchange carriers.

135 customers the opportunity to subscribe to three types of bundled service plans<sup>10</sup>. Those customers may now subscribe to a bundled service package plan that offers 1) local service with three optional services; 2) local service with three optional services plus regional toll service; or 3) local service with three optional services plus regional toll service and long-distance service at a single monthly rate.

The following table shows enrollment activity for the various Lifeline programs in 2010 and 2011.

### Lifeline Service Activity 2010-11

Company	Total Number of Customers Who Received Lifeline Service		Total Number of Customers Enrolled as of December	
	2010	2011	2010	2011
CenturyLink	5,746	4,685	4,138	3,384
Frontier Commonwealth	6,264	5,865	5,303	4,861
Verizon North*	19,229	15,942	12,404	10,548
Verizon PA*	159,559	130,389	101,081	85,102
Windstream	6,391	6,046	5,312	5,011
<b>Total</b>	<b>197,189</b>	<b>162,927</b>	<b>128,238</b>	<b>108,906</b>

\* The figures for Verizon PA and Verizon North include customers enrolled in both the Lifeline and Lifeline 135 programs.

As of July 1, 2012, the monthly credit<sup>11</sup> is \$9.25 for the Lifeline 135 program, and \$11.75 for the Verizon companies' Lifeline program.

<sup>10</sup>See Dockets C-20077916 and C-20077917.

<sup>11</sup>The monthly credit is subject to change due to the Federal Subscriber Line Cost rate changes.

## Link-Up

Link-Up helps make telephone service more affordable for low-income customers who apply for new telephone service or who transfer telephone service to a new location. Link-Up provides qualified customers with a 50 percent discount, up to \$30, on line connection charges for one residential telephone line. The program targets those customers who have incomes at or below 135 percent of the federal poverty guidelines, who receive Supplemental Security Income, or who participate in certain DPW assistance programs. The March 2, 2012, FCC Final Rule eliminated Link-Up support to all ETCs on non-Tribal lands and limits Link-Up on Tribal lands to high cost recipients deploying infrastructure. The following table presents the number of Link-Up connections reported by major local companies for 2010 and 2011 prior to the FCC rule.

### Link-Up Connections 2010 -11

Company	Number of Connections 2010	Number of Connections 2011
CenturyLink	250	86
Frontier Commonwealth	154	84
Verizon North	3,361	641
Verizon PA	28,063	5,391
Windstream	193	122
<b>Total</b>	<b>32,021</b>	<b>6,324</b>

## Universal Telephone Assistance Program

Verizon PA implemented a Universal Telephone Assistance Program (UTAP) along with its Lifeline service program as part of a settlement agreement that was approved by the Commission in 1995. Verizon PA is the only company that offers a financial assistance program that helps existing Lifeline customers and qualified Lifeline applicants (with a pre-existing basic service arrearage) to restore their basic telephone service. The Dollar Energy Fund manages UTAP and distributes funds to qualified customers and Lifeline applicants. The average UTAP assistance grant given to customers in 2011 was \$80. Overall, UTAP distributed \$83,525 in financial assistance to 1,050 of Verizon PA's qualified customers in 2011.

## Automatic Notification Program

The Lifeline service automatic notification provision at 66 Pa.C.S. § 3019(f)(5) requires that all jurisdictional ETCs provide DPW with service descriptions, subscription forms, contact telephone numbers and service area information so DPW can notify its clients about the availability of Lifeline service. In 2005, a working group consisting of representatives of the PUC, Pennsylvania Telephone Association, the Office of Consumer Advocate and the Pennsylvania Utility Law Project worked with DPW to implement this provision. Commission staff coordinated with members of the working group to develop subscription forms and listings of company contacts by county. Commission staff continues to provide DPW with copies of informational brochures and a link to the Commission's website for information about companies that offer Lifeline and Link-Up programs.

## Wireless ETC Designation

On Aug. 2, 2010, the Commission entered its order to adopt the final Policy Statement on the Commonwealth of Pennsylvania's Guidelines for Designation and Annual Recertification as an ETC for purposes of Federal Universal Service Support (ETC Guidelines) at Docket No. M-2010-2164741, which codifies the guidelines at 52 Pa. Code § 69.2501. Designation as an ETC for provision of Lifeline service would permit the wire-line and wireless providers to participate in the Universal Service Fund's (USF) Lifeline program.

Virgin Mobile USA, LP is the first wireless carrier designated by the Commission to be an ETC. On Dec. 22, 2010, the Commission approved Virgin Mobile's petition (Docket No. P-2010-2155915) for limited designation as an ETC. In January 2011, Virgin Mobile filed a petition for reconsideration to lift the Public Safety Answering Point (PSAP) certification requirements since the FCC no longer required facilities-based carriers seeking ETC status to comply with the PSAP certification obligations. The Commission approved Virgin Mobile's petition for reconsideration on Feb. 10, 2011. Effective Feb. 14, 2011, Virgin Mobile could operate its Lifeline program, Assurance Wireless, in Pennsylvania.

On Oct. 14, 2011, the Commission approved YourTel America's petition to become an ETC in Pennsylvania. On May 24, 2012, the Commission approved the ETC petitions for Cricket Communications, Inc.; Keystone Wireless, LLC d/b/a Immix Wireless; T-Mobile Northeast, LLC; T-Mobile Central, LLC and Voicestream Pittsburgh, LP. Keystone and T-Mobile each petitioned for both low-income and high-cost support and are seeking Mobility Fund Phase 1 support.

For more information about the telephone universal service programs, contact Sandra Johnson-Gumby in BCS at (717) 772-0806 or by email at [sjohnson-g@pa.gov](mailto:sjohnson-g@pa.gov).



# Glossary of Terms

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

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

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

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

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

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

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

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

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

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

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

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

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

**Justified Payment Agreement Request Rate** - The number of justified payment agreement requests per 1,000 residential customers.

**Local Exchange Carrier (LEC)** - A public utility that provides basic telephone service either exclusively or in addition to toll service.

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

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

**Payment Agreement Request Rate** - The number of payment agreement requests per 1,000 residential customers.

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

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

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

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

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

# Appendices

## Appendix A

### Consumer Ratings of BCS Service

How quickly did the PUC handle your request?		
	2010	2011
Very quickly	51%	59%
Fairly quickly	28%	28%
Not very quickly	8%	5%
Not at all quickly	8%	3%
Don't recall	3%	1%
Have not heard from PUC	3%	3%
How easy to understand was the information the PUC gave you about the outcome of the problem?		
	2010	2011
Very easy	46%	50%
Fairly easy	18%	16%
Not very easy	4%	3%
Not at all easy	3%	2%
Don't recall	2%	3%
Did not receive any information	27%	26%
How polite was the first person you talked with at the PUC?		
	2010	2011
Very polite	73%	74%
Fairly polite	18%	19%
Not very polite	4%	3%
Not at all polite	1%	1%
Don't recall	1%	1%
Did not speak to anyone	2%	2%
How interested in helping you was the first person you talked with at the PUC?		
	2010	2011
Very interested	63%	67%
Fairly interested	23%	23%
Not very interested	8%	6%
Not at all interested	2%	2%
Don't recall	1%	1%
Did not speak to anyone	1%	1%
If you had another problem with a utility, would you contact the PUC again?		
	2010	2011
Yes	82%	85%
No	8%	7%
Not sure	10%	8%

## Appendix B

### Total Volume of Consumer Complaints and Payment Agreement Requests to the BCS in 2010 and 2011

Industry	Consumer Complaints						Payment Agreement Requests					
	Residential			Commercial			Residential			Commercial		
	2010	2011	Percent Change	2010	2011	Percent Change	2010	2011	Percent Change	2010	2011	Percent Change
Electric	4,942	6,615	34%	910	786	-14%	37,344	42,603	14%	222	223	<1%
Gas	2,326	2,311	-1%	361	239	-34%	11,946	11,162	-7%	93	92	-1%
Water	934	787	-16%	100	73	-27%	5,060	4,568	-10%	19	11	-42%
Telephone	3,395	3,412	1%	367	489	33%	619	460	-26%	2	9	350%
Other	5	5	0%	1	1	0%	13	4	-69%	0	0	0%
<b>Total</b>	<b>11,602</b>	<b>13,130</b>	<b>13%</b>	<b>1,739</b>	<b>1,588</b>	<b>-9%</b>	<b>54,982</b>	<b>58,797</b>	<b>7%</b>	<b>336</b>	<b>335</b>	<b>&lt;1%</b>

## Appendix C

### 2011 Residential Consumer Complaints for Companies Not Included in Industry Chapters

Company*	Number of Complaints
<b>ELECTRIC</b>	
Non-Major Electric Distribution Companies (EDCs)**	4
AP Gas and Electric (EGS)	14
Champion Energy Services (EGS)	7
Clearview Electric (EGS)	13
Commerce Energy (EGS)	7
Constellation Energy Power Choice (EGS)	36
Direct Energy (EGS)	33
Dominion Energy Solutions (EGS)	28
Energetix (EGS)	10
Energy Plus Holdings (EGS)	13
First Energy Solutions (EGS)	49
Gateway Energy (EGS)	12
Great American Power (EGS)	6
Hop Energy (EGS)	5
IDT Energy (EGS)	30
Liberty Power (EGS)	39
North American Power (EGS)	27
Oasis Energy (EGS)	13
Palmco Power PA (EGS)	83
PPL Energy Plus (EGS)	6
Public Power (EGS)	27
Respond Power (EGS)	38

\* Only those non-major companies having five or more residential consumer complaints in 2011 are listed individually. Non-major companies having fewer than five residential consumer complaints in 2011 are included in the appropriate general category for their industry, i.e. "Other Non-Major Electric Distribution Companies" or "Other CLECs," etc.

\*\* Total number of complaints for those companies having fewer than five residential consumer complaints.

## Appendix C (Continued)

### 2011 Residential Consumer Complaints for Companies Not Included in Industry Chapters

Company*	Number of Complaints
<b>ELECTRIC (continued)</b>	
Spark Energy (EGS)	23
Starion Energy PA (EGS)	5
Stream Energy (EGS)	16
Superior Plus Energy Services (EGS)	8
Verde Energy USA (EGS)	74
Washington Gas Energy Services (EGS)	13
Other Electric Generation Suppliers (EGSs)**	26
<b>Total Non-Major Electric</b>	<b>665</b>
<b>GAS</b>	
Peoples TWP (f.k.a TW Phillips (NGDC)	36
UGI Central Penn Gas (NGDC)	33
Other Non-Major Natural Gas Distribution Companies (NGDC)**	11
Dominion Energy Solutions (NGS)	12
EnergyMark (NGS)	10
IDT Energy (NGS)	5
IGS Energy (NGS)	5
Major Energy (NGS)	24
Palmco Energy PA (NGS)	5
Titan Gas and Power (NGS)	5
Other Natural Gas Suppliers (NGSs)**	12
<b>Total Non-Major Gas</b>	<b>158</b>

\* Only those non-major companies having five or more residential consumer complaints in 2011 are listed individually. Non-major companies having fewer than five residential consumer complaints in 2011 are included in the appropriate general category for their industry, i.e. "Other Non-Major Electric Distribution Companies" or "Other CLECs," etc.

\*\* Total number of complaints for those companies having fewer than five residential consumer complaints.

## Appendix C (Continued)

### 2011 Residential Consumer Complaints for Companies Not Included in Industry Chapters

Company*	Number of Complaints
<b>WATER</b>	
Lake Spangenberg Water (Private)	6
Other Private Water**	17
Municipal Water**	7
<b>Total Non-Major Water</b>	<b>30</b>
<b>TELEPHONE</b>	
Armstrong Telephone (ILEC)	6
Conestoga (Windstream) (ILEC)	12
Consolidated Communications of PA (ILEC)	5
Denver & Ephrata Telephone (ILEC)	9
North-Eastern PA Telephone (ILEC)	6
Other Non-Major Incumbent Local Exchange Carriers (ILECs)**	12
AT&T Local (CLEC)	25
Cavalier Telephone Mid-Atlantic (CLEC)	38
Cordia Communications Corp. (d/b/a CLEC)	38
Clear Rate Communications (CLEC)	9
D & E Systems Inc. (Windstream) (CLEC)	7
Frontier Communications CTSI (CLEC)	5
Full Service Network (CLEC)	21
RCN (CLEC)	19
Service Electric Telephone, Inc. (CLEC)	5
Other Competitive Local Exchange Carriers (CLECs)**	38

\* Only those non-major companies having five or more residential consumer complaints in 2011 are listed individually. Non-major companies having fewer than five residential consumer complaints in 2011 are included in the appropriate general category for their industry, i.e. "Other Non-Major Electric Distribution Companies" or "Other CLECs," etc.

\*\* Total number of complaints for those companies having fewer than five residential consumer complaints.



## Appendix C (Continued)

### 2011 Residential Consumer Complaints for Companies Not Included in Industry Chapters

Company*	Number of Complaints
<b>TELEPHONE (Continued)</b>	
AT&T (IXC)	8
Other Interexchange Carriers (IXCs)**	3
VoIP (Voice Over Internet Protocol)	8
Other Providers of Telecommunications Services**	9
<b>Total Non-Major Telephone</b>	<b>283</b>

\* Only those non-major companies having five or more residential consumer complaints in 2011 are listed individually. Non-major companies having fewer than five residential consumer complaints in 2011 are included in the appropriate general category for their industry, i.e. "Other Non-Major Electric Distribution Companies" or "Other CLECs," etc.

\*\* Total number of complaints for those companies having fewer than five residential consumer complaints.

# Appendix D-1

## Classification of Consumer Complaints

### Electric, Gas & Water

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

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

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

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

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

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

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

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

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

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

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

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

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

**All Other Problems** - All other complaints that do not fit into the above categories, including, but not limited to, complaints about termination procedures when there is a need for payment agreements.

## Appendix D-2

### Classification of Consumer Complaints Telephone

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

**Audiotex** - Complaints about the company's failure to resolve billing problems related to special phone entertainment or information services. In 2011, BCS evaluated no residential consumer complaints about audiotex.

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

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

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

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

**Extended Area of Service (EAS)** - Complaints about a limited local calling area. In 2011, BCS evaluated no residential consumer complaints about EAS.

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

**Rates** - General or specific complaints about a utility's rates: general or specific rates are too high or the customer is being billed on the incorrect rate. In 2011, BCS evaluated one residential consumer complaint about rates.

**Sales Nonbasic Services** - Complaints related to the sale of nonbasic services, including the availability of certain services. In 2011, BCS evaluated one residential consumer complaint about sales of nonbasic services.

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

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

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

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

**All Other Problems** - All other complaints that do not fit into the above categories including complaints about excessive coin-phone rates. Also included are complaints that were taken in by BCS, but closed before they could be investigated because the consumer called back and resolved the complaint with the company or because the consumer changed their mind about filing the complaint. In addition, some complaints, during investigation, were found to not fall under the PUC's jurisdiction.

## Appendix E - Table 1

### Consumer Complaint Categories: 2011\*

#### Major Electric Distribution Companies

Categories**	Duquesne	Met-Ed	PECO***	Penelec	Penn Power	PPL	UGI-Electric	West Penn	Electric Majors
Personnel Problems	180	83	56	60	16	61	4	45	505
Billing Disputes	73	118	67	98	16	60	5	43	480
Service Interruptions	26	262	10	16	1	40	12	34	401
Metering	12	108	22	95	12	31	4	45	329
Credit and Deposits	39	38	18	24	9	11	15	72	226
Discontinuance/ Transfer	50	33	46	25	8	40	8	13	223
Other Payment Issues	66	17	28	16	7	29	4	8	175
Damages	16	20	7	28	4	7	2	34	118
Scheduling Delays	13	21	5	24	5	9	0	21	98
Service Extensions	8	18	2	15	6	2	1	17	69
Rates	4	4	7	3	8	33	1	1	61
Service Quality	6	18	9	3	0	5	2	7	50
All Other Problems	120	59	65	45	20	42	10	45	406
<b>Total*</b>	<b>613</b>	<b>799</b>	<b>342</b>	<b>452</b>	<b>112</b>	<b>370</b>	<b>68</b>	<b>385</b>	<b>3,141</b>

\* Categories are for residential complaints evaluated by BCS as of May 27, 2012, whether the case outcome was found to be "justified."

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

\*\*\* PECO statistics include electric and gas, and are based on a probability sample of cases.

## Appendix E - Table 2

### Consumer Complaint Categories: 2011\* Major Natural Gas Distribution Companies

Categories**	Columbia	Equitable	NFG	Peoples	PGW	UGI-Gas	UGI Penn Natural	Gas Majors
Billing Disputes	29	16	4	24	170	19	20	282
Personnel Problems	37	35	20	26	78	29	17	242
Discontinuance/ Transfer	15	13	12	16	95	13	13	177
Metering	23	7	18	17	83	4	0	152
Other Payment Issues	13	9	14	23	44	11	4	118
Credit and Deposits	2	7	2	10	9	25	29	84
Scheduling Delays	9	3	4	15	26	4	2	63
Damages	14	3	6	16	4	6	2	51
Service Quality	15	5	8	12	2	5	4	51
Service Extensions	3	5	0	3	6	3	3	23
Service Interruptions	1	0	0	3	4	3	2	13
Rates	1	1	0	1	1	0	2	6
All Other Problems	19	27	7	5	41	18	17	134
<b>Total*</b>	<b>181</b>	<b>131</b>	<b>95</b>	<b>171</b>	<b>563</b>	<b>140</b>	<b>115</b>	<b>1,396</b>

\* Categories are for residential complaints evaluated by BCS as of May 27, 2012, whether the case outcome was found to be "justified."

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

### Appendix E - Table 3

#### Consumer Complaint Categories: 2011\*

#### Major Water Companies

Categories**	Aqua	PAWC	“Other Class A” Water	All “Class A” Water
Billing Disputes	106	157	9	272
Personnel Problems	31	47	2	80
Metering	23	22	2	47
Damages	11	29	0	40
Service Quality	15	15	1	31
Discontinuance/Transfer	10	11	1	22
Scheduling Delays	7	12	3	22
Other Payment Issues	4	7	0	11
Service Interruptions	2	8	0	10
Service Extensions	4	4	0	8
Rates	4	2	0	6
Credit and Deposits	1	1	0	2
All Other Problems	24	38	1	63
<b>Total*</b>	<b>242</b>	<b>353</b>	<b>19</b>	<b>614</b>

\* Categories are for residential complaints evaluated by BCS as of May 27, 2012, whether the case outcome was found to be “justified.”

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



## Appendix E - Table 4

### Consumer Complaint Categories: 2011\*

#### Major Local Telephone Companies

Categories**	CenturyLink	Frontier Common- wealth	Verizon North	Verizon PA	Windstream	Telephone Majors
Unsatisfactory Service	17	23	29	400	23	492
Billing Disputes	34	19	26	398	12	489
Service Delivery	12	20	34	319	15	400
Service Terminations	7	5	8	99	7	126
Competition	3	10	6	45	1	65
Toll Services	7	1	3	16	0	27
Credit and Deposits	1	2	2	18	1	24
Discontinuance/ Transfer	1	3	2	13	0	19
Non-Recurring Charges	0	0	1	3	2	6
Annoyance Calls	0	0	0	3	0	3
All Other Problems	7	3	8	153	4	175
<b>Total*</b>	<b>89</b>	<b>86</b>	<b>119</b>	<b>1,467</b>	<b>65</b>	<b>1,826</b>

\* Categories are for residential complaints evaluated by BCS as of April 27, 2012, whether the case outcome was found to be "justified."

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

## Appendix F - Table 1

### 2010-11 Residential Consumer Complaint Statistics Major Electric Distribution Companies

Company Name	2011 Residential Customers	Residential Consumer Complaints to BCS			Consumer Complaint Rates <sup>1</sup>		Justified Consumer Complaints			
		2010	2011	% Change in #	2010	2011	Numbers <sup>2</sup> / Rates <sup>3</sup> 2010		Numbers <sup>2</sup> / Rates <sup>3</sup> 2011	
Duquesne	524,865	579	777	34%	1.10	1.48	76	0.14	94	0.18
Met-Ed	486,796	459	970	111%	0.94	1.99	47	0.10	56	0.12
PECO <sup>5</sup>	1,425,355	1,832	1,729	-6%	1.29	1.21	311*	0.22*	283*	0.20*
Penelec	505,585	318	559	76%	0.63	1.11	27	0.05	45	0.09
Penn Power	140,338	127	139	9%	0.91	0.99	9	0.06	6	0.04
PPL	1,213,953	924	1,235	34%	0.76	1.02	144	0.12	100	0.08
UGI-Electric	55,588	72	76	6%	1.32	1.37	6	0.11	7	0.13
West Penn	615,450	550	465	-15%	0.89	0.76	87	0.14	65	0.11
<b>Major Electric</b>	<b>4,967,930</b>	<b>4,861</b>	<b>5,950</b>	<b>22%</b>			<b>707</b>		<b>656</b>	
<b>Average of Rates</b>					<b>0.93<sup>4</sup></b>	<b>1.22<sup>4</sup></b>		<b>0.12<sup>4</sup></b>		<b>0.12<sup>4</sup></b>

<sup>1</sup> Consumer complaint rate = consumer complaints per 1,000 residential customers.

<sup>2</sup> Estimated based on the number of cases on CSIS as of May 27, 2012.

<sup>3</sup> Justified consumer complaint rate = justified consumer complaints per 1,000 residential customers.

<sup>4</sup> Does not include UGI-Electric.

<sup>5</sup> PECO statistics include electric and gas.

\* Based on a probability sample of cases.

## Appendix F - Table 2

### 2010-11 Residential Consumer Complaint Statistics Major Natural Gas Distribution Companies

Company Name	2011 Residential Customers	Residential Consumer Complaints to BCS			Consumer Complaint Rates <sup>1</sup>		Justified Consumer Complaints			
		2010	2011	% Change in #	2010	2011	Numbers <sup>2</sup> / Rates <sup>3</sup> 2010		Numbers <sup>2</sup> / Rates <sup>3</sup> 2011	
Columbia	374,275	231	229	-1%	0.62	0.61	29	0.08	24	0.06
Equitable	240,115	220	168	-24%	0.93	0.70	22	0.09	15	0.06
NFG	198,419	134	115	-14%	0.68	0.58	18	0.09	7	0.04
Peoples	329,805	272	214	-21%	0.83	0.65	48	0.15	46	0.14
PGW	479,284	947	1,120	18%	1.97	2.34	95*	0.20*	139*	0.29*
UGI-Gas	310,453	212	175	-18%	0.69	0.56	30	0.10	10	0.03
UGI Penn Natural	145,341	203	132	-35%	1.40	0.91	24	0.17	16	0.11
<b>Major Gas</b>	<b>2,077,692</b>	<b>2,219</b>	<b>2,153</b>	<b>-3%</b>			<b>266</b>		<b>257</b>	
<b>Average of Rates</b>					<b>1.02</b>	<b>0.91</b>		<b>0.12</b>		<b>0.10</b>

<sup>1</sup> Consumer complaint rate = consumer complaints per 1,000 residential customers.

<sup>2</sup> Estimated based on the number of cases on CSIS as of May 27, 2012.

<sup>3</sup> Justified consumer complaint rate = justified consumer complaints per 1,000 residential customers.

\* Based on a probability sample of cases.

## Appendix F - Table 3

### 2010-11 Residential Consumer Complaint Statistics Major Water Companies

Company Name	2011 Residential Customers	Residential Consumer Complaints to BCS			Consumer Complaint Rates <sup>1</sup>		Justified Consumer Complaints			
		2010	2011	% Change in #	2010	2011	Numbers <sup>2</sup> / Rates <sup>3</sup> 2010		Numbers <sup>2</sup> / Rates <sup>3</sup> 2011	
Aqua	383,068	304	294	-3%	0.80	0.77	110	0.29	74	0.19
PAWC	588,325	570	441	-23%	0.97	0.75	131	0.22	86	0.15
"Other Class A" Water	134,190	22	22	0%	0.16	0.16	5	0.04	6	0.04
<b>Major Water</b>	<b>1,105,583</b>	<b>896</b>	<b>757</b>	<b>-16%</b>			<b>246</b>		<b>166</b>	
<b>Average of Rates</b>					<b>0.64</b>	<b>0.56</b>		<b>0.18</b>		<b>0.13</b>

<sup>1</sup> Consumer complaint rate = consumer complaints per 1,000 residential customers.

<sup>2</sup> Estimated based on the number of cases on CSIS as of May 27, 2012.

<sup>3</sup> Justified consumer complaint rate = justified consumer complaints per 1,000 residential customers.

## Appendix F - Table 4

### 2010-11 Residential Consumer Complaint Statistics Major Local Telephone Companies

Company Name	2011 Residential Customers	Residential Consumer Complaints to BCS			Consumer Complaint Rates <sup>1</sup>		Justified Consumer Complaints			
		2010	2011	% Change in #	2010	2011	Numbers <sup>2</sup> / Rates <sup>3</sup> 2010		Numbers <sup>2</sup> / Rates <sup>3</sup> 2011	
CenturyLink	170,440	72	93	29%	0.39	0.55	30	0.16	43	0.25
Frontier Commonwealth	135,451	69	86	25%	0.54***	0.63	38	0.30***	55	0.41
Verizon North**	260,003	131	121	-8%	0.45	0.47	61	0.21	65	0.25
Verizon PA**	1,689,877	2,725	2,763	1%	1.40	1.64	1,392*	0.72*	1,554*	0.92*
Windstream	118,122	72	66	-8%	0.57	0.56	26	0.21	32	0.27
<b>Major Telephone</b>	<b>2,373,893</b>	<b>3,069</b>	<b>3,129</b>	<b>2%</b>			<b>1,547</b>		<b>1,749</b>	
<b>Average of Rates</b>					<b>0.67</b>	<b>0.77</b>		<b>0.32</b>		<b>0.42</b>

<sup>1</sup> Consumer complaint rate = consumer complaints per 1,000 residential customers.

<sup>2</sup> Estimated based on the number of cases on CSIS as of April 27, 2012.

<sup>3</sup> Justified consumer complaint rate = justified consumer complaints per 1,000 residential customers.

\* Based on a probability sample of cases.

\*\* BCS is currently offering all Verizon customers who call with a service issue the voluntary option of being transferred to a special Verizon team that immediately begins working to resolve the customer's complaint. If a customer chooses the voluntary transfer, BCS categorizes the contact as an "inquiry" rather than as a "consumer complaint." BCS categorized 1,415 of these contacts regarding Verizon service issues as inquiries during 2011.

\*\*\* BCS revised the 2010 consumer complaint rate and 2010 justified consumer complaint rate for Frontier Commonwealth. It was discovered a submission error was made when reporting the 2010 number of residential customers to BCS.

## Appendix G - Table 1

### 2010-11 Residential Payment Agreement Request (PAR) Statistics Major Electric Distribution Companies

Company Name	2011 Residential Customers	Residential PARs to BCS			PAR Rates <sup>1</sup>		Justified PARs			
		2010	2011	% Change In #	2010	2011	Numbers <sup>2</sup> / Rates <sup>3</sup> 2010		Numbers <sup>2</sup> / Rates <sup>3</sup> 2011	
Duquesne	524,865	4,859	5,616	16%	9.27	10.70	133	0.25	67	0.13
Met-Ed	486,796	1,628	2,120	30%	3.35	4.36	58	0.12	28	0.06
PECO <sup>5</sup>	1,425,355	8,462	9,056	7%	5.96	6.35	485	0.34	143	0.10
Penelec	505,585	1,154	1,860	61%	2.28	3.68	49	0.10	32	0.06
Penn Power	140,338	497	663	33%	3.55	4.72	13	0.09	17	0.12
PPL	1,213,953	17,219	19,823	15%	14.21	16.33	1,037	0.86	1,088	0.90
UGI-Electric	55,588	716	797	11%	13.14	14.34	21	0.39	7	0.13
West Penn	615,450	2,781	2,616	-6%	4.52	4.25	549	0.89	145	0.24
<b>Major Electric</b>	<b>4,967,930</b>	<b>37,316</b>	<b>42,551</b>	<b>14%</b>			<b>2,345</b>		<b>1,527</b>	
<b>Average of Rates</b>					<b>6.16<sup>4</sup></b>	<b>7.20<sup>4</sup></b>		<b>0.38<sup>4</sup></b>		<b>0.23<sup>4</sup></b>

<sup>1</sup> PAR rate = PARs per 1,000 residential customers.

<sup>2</sup> With the exception of UGI-Electric, each company's number of justified PARs is estimated based on a probability sample of cases. The number of justified PARs for all EDCs is based on the number of cases on CSIS as of May 27, 2012.

<sup>3</sup> Justified PAR rate = justified PARs per 1,000 residential customers.

<sup>4</sup> Does not include UGI-Electric.

<sup>5</sup> PECO statistics include electric and gas.

## Appendix G - Table 2

### 2010-11 Residential Payment Agreement Request (PAR) Statistics Major Natural Gas Distribution Companies

Company Name	2011 Residential Customers	Residential PARs to BCS			PAR Rates <sup>1</sup>		Justified PARs			
		2010	2011	% Change in #	2010	2011	Numbers <sup>2</sup> / Rates <sup>3</sup> 2010		Numbers <sup>2</sup> / Rates <sup>3</sup> 2011	
Columbia	374,275	834	841	1%	2.24	2.25	16	0.04	2	0.01
Equitable	240,115	1,460	1,222	-16%	6.14	5.09	32	0.13	13	0.05
NFG	198,419	884	559	-37%	4.47	2.82	51	0.26	16	0.08
Peoples	329,805	829	374	-55%	2.54	1.13	40	0.12	18	0.05
PGW	479,284	2,909	3,253	12%	6.07	6.79	133	0.28	87	0.18
UGI-Gas	310,453	2,422	2,717	12%	7.92	8.75	72	0.24	58	0.19
UGI Penn Natural	145,341	2,069	1,814	-12%	14.31	12.48	177	1.22	28	0.19
<b>Major Gas</b>	<b>2,077,692</b>	<b>11,407</b>	<b>10,780</b>	<b>-5%</b>			<b>521</b>		<b>222</b>	
<b>Average of Rates</b>					<b>6.24</b>	<b>5.62</b>		<b>0.33</b>		<b>0.11</b>

<sup>1</sup> PAR rate = PARs per 1,000 residential customers.

<sup>2</sup> Estimated based on a probability sample of cases for all NGDCs except Peoples and the number of cases on CSIS as of May 27, 2012.

<sup>3</sup> Justified PAR rate = justified PARs per 1,000 residential customers.

## Appendix G - Table 3

### 2010-11 Residential Payment Agreement Request (PAR) Statistics Major Water Companies

Company Name	2011 Residential Customers	Residential PARs to BCS			PAR Rates <sup>1</sup>		Justified PARs			
		2010	2011	% Change in #	2010	2011	Numbers <sup>2</sup> / Rates <sup>3</sup> 2010		Numbers <sup>2</sup> / Rates <sup>3</sup> 2011	
Aqua	383,068	1,531	1,501	-2%	4.02	3.92	99*	0.26*	60*	0.16*
PAWC	588,325	3,336	2,844	-15%	5.68	4.83	570*	0.97*	241*	0.41*
"Other Class A" Water	134,190	134	176	31%	1.00	1.31	3	0.02	0	0.00
<b>Major Water</b>	<b>1,105,583</b>	<b>5,001</b>	<b>4,521</b>	<b>-10%</b>			<b>672</b>		<b>301</b>	
<b>Average of Rates</b>					<b>3.57</b>	<b>3.35</b>		<b>0.42</b>		<b>0.19</b>

<sup>1</sup> PAR rate = PARs per 1,000 residential customers.

<sup>2</sup> Estimated based on a probability sample of cases and the number of cases on CSIS as of May 27, 2012.

<sup>3</sup> Justified PAR rate = justified PARs per 1,000 residential customers.

\* Based on a probability sample of cases.



## Appendix G - Table 4

### 2010-11 Residential Payment Agreement Request (PAR) Statistics Major Local Telephone Companies

Company Name	2011 Residential Customers	Residential PARs to BCS			PAR Rates <sup>1</sup>		Justified PARs			
		2010	2011	% Change in #	2010	2011	Numbers <sup>2</sup> / Rates <sup>3</sup> 2010		Numbers <sup>2</sup> / Rates <sup>3</sup> 2011	
CenturyLink	170,440	7	25	257%	0.04	0.15	0	0.00	3	0.02
Frontier Commonwealth	135,451	13	8	-38%	0.10**	0.06	4	0.03	1	0.01
Verizon North	260,003	18	17	-6%	0.06	0.07	2	0.01	2	0.01
Verizon PA	1,689,877	511	336	-34%	0.26	0.20	72*	0.04*	19*	0.01*
Windstream	118,122	11	8	-27%	0.09	0.07	4	0.03	2	0.02
<b>Major Telephone</b>	<b>2,373,893</b>	<b>560</b>	<b>394</b>	<b>-30%</b>			<b>82</b>		<b>27</b>	
<b>Average of Rates</b>					<b>0.11</b>	<b>0.11</b>		<b>0.02</b>		<b>0.01</b>

<sup>1</sup> PAR rate = PARs per 1,000 residential customers.

<sup>2</sup> Estimated based on the number of cases on CSIS as of April 27, 2012.

<sup>3</sup> Justified PAR rate = justified PARs per 1,000 residential customers.

\* Based on a probability sample of cases.

\*\* BCS revised the 2010 PAR rate for Frontier Commonwealth. It was discovered a submission error was made when reporting the 2010 number of residential customers to BCS.

## Appendix H – Table 1

### Chapter 56, Chapter 14 and Other Infraction Categories: 2011\* Major Electric Distribution Companies

Description	Duquesne		Met-Ed		PECO+		Penelec		Penn Power		PPL		UGI-Electric		West Penn	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Billing and Payment (56.2-Def. of Billing Month, 56.2-Def. of Billing Period, 56.11, 56.15, 56.21, 56.22 and 56.24)	1	2%	4	9%	3	5%	2	5%	0	0%	4	14%	1	25%	2	5%
Meter Reading (56.12)	1	2%	3	7%	3	5%	6	16%	0	0%	1	3%	0	0%	0	0%
Make-Up Bills (56.14, 57.24, 59.22 and 65.9 (C))	0	0%	3	7%	1	2%	1	3%	1	13%	0	0%	0	0%	2	5%
Transfer of Accounts (56.16 and Secretarial Letter re: third-party request for service)	1	2%	2	5%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Credit Standards and Deposits (56.32-37, 56.41, 1404 (A)-(C) and 1404 (E)-(H))	11	18%	4	9%	6	10%	3	8%	1	13%	1	3%	2	50%	5	11%
Termination Grounds (56.2-Def. of Delinquent Acct., 56.81-83, 1405 (F), 1406 (A) and 1406 (C))	3	5%	3	7%	0	0%	2	5%	2	25%	0	0%	0	0%	1	2%
Termination Procedures (56.91-97, 1406 (B), 1406 (D)-(F) and 1406 (H))	2	3%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	7	16%
Reconnection of Service (56.191 and 1407 (A)-(C))	2	3%	1	2%	1	2%	1	3%	0	0%	0	0%	0	0%	5	11%
Liability - Responsibility for Bills (1403-Def. of Applicant, 1403-Def. of Customer, 1404 (D) and 1407 (D)-(E))	3	5%	0	0%	1	2%	1	3%	0	0%	0	0%	0	0%	2	5%
Landlord/Ratepayer (1521-1533)	2	3%	2	5%	1	2%	1	3%	0	0%	0	0%	0	0%	1	2%
Dispute Handling (56.2-Def. of Dispute, 56.141-152, 56.181 and 1410)	31	51%	21	49%	41	69%	19	51%	3	38%	20	69%	1	25%	19	43%
Other (56.1, 56.72, 56.111, 56.202, 57.173, 1417 and Marketing Guidelines G and O)	4	7%	0	0%	2	3%	1	3%	1	13%	3	10%	0	0%	0	0%
<b>Total**</b>	<b>61</b>		<b>43</b>		<b>59</b>		<b>37</b>		<b>8</b>		<b>29</b>		<b>4</b>		<b>44</b>	

\* # equals the number of verified infractions identified by BCS as of July 25, 2012.

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

\*\* % columns may total more or less than 100 percent due to rounding.

+ PECO statistics include electric and gas.

## Appendix H – Table 2

### Chapter 56, Chapter 14 and Other Infraction Categories: 2011\* Major Natural Gas Distribution Companies

Description	Columbia		Equitable		NFG		Peoples		PGW		UGI – Gas		UGI Penn Natural	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Billing and Payment (56.2-Def. of Billing Month, 56.2-Def. of Billing Period, 56.11, 56.15, 56.21, 56.22 and 56.24)	0	0%	1	13%	0	0%	6	10%	4	5%	0	0%	1	8%
Meter Reading (56.12)	2	15%	0	0%	0	0%	3	5%	0	0%	0	0%	0	0%
Make-Up Bills (56.14, 57.24, 59.22 and 65.9 (C))	0	0%	0	0%	0	0%	1	2%	15	19%	0	0%	0	0%
Transfer of Accounts (56.16 and Secretarial Letter re: third-party request for service)	2	15%	0	0%	1	25%	1	2%	1	1%	0	0%	0	0%
Credit Standards and Deposits (56.32-37, 56.41, 1404 (A)-(C) and 1404 (E)-(H))	2	15%	0	0%	0	0%	7	11%	7	9%	0	0%	1	8%
Termination Grounds (56.2-Def. of Delinquent Acct., 56.81-83, 1406 (A) and 1406 (C))	2	15%	1	13%	0	0%	1	2%	0	0%	0	0%	2	17%
Termination Procedures (56.91-97, 1406 (B), 1406 (D)-(F) and 1406 (H))	0	0%	1	13%	0	0%	2	3%	2	3%	1	11%	2	17%
Reconnection of Service (56.191 and 1407 (A)-(C))	1	8%	0	0%	0	0%	0	0%	5	6%	0	0%	0	0%
Liability - Responsibility for Bills (1403-Def. of Applicant, 1403-Def. of Customer, 1404 (D) and 1407 (D)-(E))	0	0%	1	13%	0	0%	0	0%	4	5%	1	11%	0	0%
Landlord/Ratepayer (1521-1533)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Dispute Handling (56.2-Def. of Dispute, 56.141-152, 56.181 and 1410)	4	31%	4	50%	3	75%	38	62%	34	43%	4	44%	5	42%
Other (56.71, 56.72, 1414(C), 1501 and Marketing Guidelines G)	0	0%	0	0%	0	0%	2	3%	7	9%	3	33%	1	8%
<b>Total**</b>	<b>13</b>		<b>8</b>		<b>4</b>		<b>61</b>		<b>79</b>		<b>9</b>		<b>12</b>	

\* # equals the number of verified infractions identified by BCS as of July 25, 2012.  
 % equals the percent of the total number of infractions for a particular company.  
 \*\* % columns may total more or less than 100 percent due to rounding.

## Appendix H - Table 3

### Chapter 56, Chapter 14 and Other Infraction Categories: 2011\* Major Water Companies

Description	Aqua		PAWC		"Other Class A"	
	#	%	#	%	#	%
Billing and Payment (56.2-Def. of Billing Month, 56.2-Def. of Billing Period, 56.11, 56.15, 56.21, 56.22 and 56.24)	21	26%	20	26%	2	67%
Meter Reading (56.12)	1	1%	0	0%	0	0%
Make-Up Bills (56.14, 57.24, 59.22 and 65.9 (C))	13	16%	1	1%	0	0%
Transfer of Accounts (56.16 and Secretarial Letter re: third-party request for service)	2	2%	1	1%	0	0%
Credit Standards and Deposits (56.32-37, 56.41, 1404 (A)-(C) and 1404 (E)-(H))	2	2%	1	1%	0	0%
Termination Grounds (56.2-Def. of Delinquent Acct., 56.81-83, 1406 (A) and 1406 (C))	2	2%	2	3%	0	0%
Termination Procedures (56.91-97, 1406 (B), 1406 (D)-(F) and 1406 (H))	2	2%	1	1%	0	0%
Reconnection of Service (56.191 and 1407 (A)-(C))	0	0%	0	0%	1	33%
Liability - Responsibility for Bills (1403-Def. of Applicant, 1403-Def. of Customer, 1404 (D) and 1407 (D)-(E))	2	2%	1	1%	0	0%
Landlord/Ratepayer (1521-1533)	2	2%	0	0%	0	0%
Dispute Handling (56.2-Def. of Dispute, 56.141-152, 56.181 and 1410)	34	42%	50	64%	0	0%
Other (56.202)	0	0%	1	1%	0	0%
<b>Total**</b>	<b>81</b>		<b>78</b>		<b>3</b>	

\* # equals the number of verified infractions identified by BCS as of July 25, 2012.

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

\*\* % columns may total more or less than 100 percent due to rounding.

## Appendix H – Table 4

### Chapter 63 Infraction Categories: 2011\*

#### Major Local Telephone Companies

Description	CenturyLink		Frontier Commonwealth		Verizon North		Verizon PA		Wind-stream	
	#	%	#	%	#	%	#	%	#	%
Complaint Procedures (63.15)	3	8%	12	15%	11	8%	202	6%	6	29%
Service Records (63.22)	14	38%	23	28%	1	1%	41	1%	0	0%
Customer Trouble Reports (63.57)	20	54%	45	56%	120	89%	2,845	90%	15	71%
Installation of Service (63.58)	0	0%	0	0%	0	0%	0	0%	0	0%
Migration (63.201-221)	0	0%	1	1%	3	2%	63	2%	0	0%
Other (63.21, 63.53 and 63.59)	0	0%	0	0%	0	0%	4	<1%	0	0%
<b>Total**</b>	<b>37</b>		<b>81</b>		<b>135</b>		<b>3,155</b>		<b>21</b>	

\* # equals the number of verified infractions identified by BCS as of May 14, 2012.

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

\*\* % columns may total more or less than 100 percent due to rounding.

## Appendix H – Table 5

### Chapter 64 Infraction Categories: 2011\*

#### Major Local Telephone Companies

Description	CenturyLink		Frontier Commonwealth		Verizon North		Verizon PA		Wind-stream	
	#	%	#	%	#	%	#	%	#	%
Billing and Payment (64.1, 64.12-14, 64.16 and 64.18-19)	36	38%	11	13%	18	31%	305	26%	19	45%
Slamming and Cramming (64.23)	9	9%	17	20%	4	7%	207	17%	0	0%
Credit and Deposits (64.32-34 and 64.36)	1	1%	5	6%	2	3%	12	1%	1	2%
Suspension and Termination (64.63, 64.71-74, 64.81, 64.121, 64.123, 64.133 and 64.181)	4	4%	3	4%	1	2%	48	4%	3	7%
Dispute Procedures (64.141 and 64.153)	41	43%	41	49%	31	53%	555	47%	19	45%
Other (64.2, 64.24, 64.51-53 and 64.191-192)	4	4%	6	7%	2	3%	62	5%	0	0%
<b>Total**</b>	<b>95</b>		<b>83</b>		<b>58</b>		<b>1,189</b>		<b>42</b>	

\* # equals the number of verified infractions identified by BCS as of May 14, 2012.

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

\*\* % columns may total more or less than 100 percent due to rounding.

## Consumer Access to the Public Utility Commission

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

**PUC Hotline: 1-800-692-7380 (toll free)**  
**General Information Line: 717-783-1740 (not toll free)**

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

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

Information about the PUC is available on the Internet:

[www.puc.pa.gov](http://www.puc.pa.gov)



Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
[www.puc.pa.gov](http://www.puc.pa.gov)



PUBLIC UTILITY COMMISSION