

# Utility Consumer Activities Report and Evaluation



2022

PENNSYLVANIA PUBLIC UTILITY COMMISSION

The logo for the Pennsylvania Public Utility Commission (PAPUC). It features the acronym "PAPUC" in a bold, white, sans-serif font. Above the letters "A" and "P" is a white outline of a house roof.



# Utility Consumer Activities Report and Evaluation 2022

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Bureau of Consumer Services

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# Executive Summary

The Bureau of Consumer Services presents its annual assessment of the major utilities in the 2022 Utility Consumer Activities Report and Evaluation (UCARE). Assembled in one comprehensive report, the UCARE focuses on case handling activity relative to the major electric, gas, water, and telecommunications utilities. The annual UCARE reports and the quarterly UCARE snapshots posted on the PUC website have been prepared to meet the statutory reporting requirement of 66 Pa.C.S. § 308(d) and to communicate to the public and the utility industry how jurisdictional utilities performed relative to informal complaint activity in 2022.

As reflected in the data presented in the report, the number of complaints received was impacted starting in 2020 due to the direct and indirect effects of the COVID-19 pandemic and efforts to address the public health crisis. The COVID-19 pandemic impacted other data as well, such as EDCs and NGDCs conducting fewer terminations and reconnections in 2020, compared to previous years. In 2022, terminations and reconnections were much closer to pre-pandemic levels.

Due to the low volume of complaints about the non-major companies in 2022, BCS presents a summary table listing the non-major companies with five or more residential informal complaints in Appendix C. The informal complaints in Appendix C include both Consumer Complaints and payment arrangement requests (PARs).

Assistance programs for the electric and gas industries are presented in the Universal Service Programs and Collections Performance reports, while assistance programs for the water and telecommunications industries are highlighted in Chapters 9 and 10 of the annual UCARE report.

In 2022, BCS received a total of 115,609 contacts by consumers. Of those contacts, 47,727 needed further investigation (NFIs), which was up from the previous year but still less than the pre-COVID year 2019. BCS also received 16,953 contacts that were addressed on the initial contact. These First Contact Resolutions (FCRs) may also represent some non-jurisdictional dismissals. The top reasons for contact were calls regarding termination or suspension of service and non-jurisdictional complaints.

Billing disputes were the number one reason for Consumer Complaints in the electric, gas, and water industries in 2022. The number one reason for residential telecommunications Consumer Complaints is unsatisfactory service.

Prior to 2022, BCS used a third party to conduct the BCS Feedback Survey, sampling complainants who have contacted BCS. In 2022, BCS took the function in-house and found opportunities to recalibrate the survey process by changing the delivery of the surveys from USPS hard copy to electronic methods, taking advantage of new technology. This change allowed BCS to separate the Intake function, those staff who open the complaints, from the Investigative function. The survey sampling percentage and number of surveys sent were significantly increased from an annual average of approximately 5,000 surveys to over 31,000 Intake surveys and over 28,000 Investigative surveys in 2022.

# 1. Introduction

This Utility Consumer Activities Report and Evaluation (UCARE) is prepared annually by the Public Utility Commission's (PUC's) Bureau of Consumer Services (BCS) in accordance with the requirements found at 66 Pa.C.S. § 308.1(a). The report details utility compliance with statutes and regulations concerning residential customer service and billing matters as reflected in:

- Title 66 (Public Utility Code):
  - [Chapter 14 Responsible Utility Customer Protection Act](#)
  - [Chapter 15 Service and Facilities](#)
  - [Chapter 22 Natural Gas Choice and Competition Act](#)
  - [Chapter 28 Electricity Generation Customer Choice and Competition Act](#)
  - [Chapter 30 Alternate Form of Regulation of Telecommunications Services](#)
- 52 Pa. Code:
  - [Chapter 53 Tariffs for Noncommon Carriers](#)
  - [Chapter 54 Electricity Generation Customer Choice](#)
  - [Chapter 55 Noncarrier Rates and Practices](#)
  - [Chapter 56 Standards and Billing Practices for Residential Utility Service](#)
  - [Chapter 57 Electric Service](#)
  - [Chapter 59 Gas Service](#)
  - [Chapter 62 Natural Gas Supply Customer Choice](#)
  - [Chapter 63 Telephone Service](#)
  - [Chapter 64 Standards and Billing Practices for Residential Telephone Service](#)
  - [Chapter 65 Water Service](#)
  - [Chapter 111 Marketing and Sales Practices for the Retail Residential Energy Market](#)
- Utility Tariffs approved by the PUC:
  - [Electric Tariffs](#)
  - [Natural Gas Tariffs](#)
  - [Water/Wastewater Tariffs](#)
  - [Telecommunications Tariffs](#)

The data presented in this report is obtained from informal complaints received by the BCS in 2022 concerning the electric, natural gas, water and telecommunications industries under the PUC's jurisdiction. For comparative purposes, the 2022 data in this report is presented alongside data from prior years. Where appropriate, some of the data presented in this report is based on a statistically valid sampling of informal complaints and is noted as such throughout the report.

## Impact of COVID-19 Pandemic

The information in this report cannot be adequately analyzed without first acknowledging the impact of the COVID-19 pandemic. The unprecedented challenges significantly impacted the global economy. Federal and state governments and utilities implemented emergency policy measures and operational adjustments. The PUC office buildings were closed to the public from March 16, 2020, until Aug. 2, 2021, with limited BCS staff working remotely for the first few weeks. The PUC Hotline was initially open to take emergency calls only. BCS was fully operational by July 1, 2020.

To address public health and safety concerns, on March 6, 2020, former Governor Tom Wolf issued a Proclamation of Disaster Emergency in response to the COVID-19 pandemic (*Emergency Proclamation*).<sup>1</sup> On March 13, 2020, former Chairman Gladys Brown Dutrieuille issued an *Emergency Order* which prohibited jurisdictional public utilities from terminating service during the duration of the *Emergency Proclamation* unless termination of service was necessary to ameliorate a safety emergency or unless otherwise determined by the Commission. The *Emergency Order* also encouraged utilities to reconnect previously terminated service if such action could be done safely.<sup>2</sup>

On Oct. 13, 2020, the Commission entered an Order modifying the *Emergency Order* (October 2020 Order).<sup>3</sup> The October 2020 Order lifted the termination moratorium for certain customers effective Nov. 9, 2020, but continued the termination moratorium for “protected customers” at or below 300% of the Federal Poverty Income Guidelines (FPIG), under certain conditions, and established protections for certain residential and small business customers. The termination moratorium and protections established by the October 2020 Order expired on March 31, 2021.

As shown throughout this report, the pandemic impacted the number of complaints received in 2020 and 2021 compared to previous years. Although complaint levels in 2022 started to rise more closely to pre-pandemic levels, BCS expects anomalous caseload activity to continue for the next several years and will monitor trends to assess related impacts and recovery efforts.

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<sup>1</sup> <https://www.fmcsa.dot.gov/sites/fmcsa.dot.gov/files/2020-03/Pennsylvania%2020200306-COVID19-Digital-Proclamation.pdf>

<sup>2</sup> See Public Utility Service Termination Moratorium Proclamation of Disaster Emergency-COVID-19, Docket No. M-2020-3019244 (Emergency Order ratified on March 26, 2020). <https://www.puc.pa.gov/pcdocs/1658422.pdf>

<sup>3</sup> See Public Utility Service Termination Moratorium - Modification of March 13th Emergency Order, Docket No. M-2020-3019244. <https://www.puc.pa.gov/pcdocs/1682379.doc>



## 2. The Bureau of Consumer Services (BCS)

The Pennsylvania PUC's BCS was established by 66 Pa.C.S. § 308. BCS is charged with investigating and issuing final determinations on all informal complaints. BCS began investigating and writing decisions on informal complaints in April 1977. Since that time, BCS has resolved over 4.1 million informal complaints.

### Informal Complaints Received by BCS

Informal complaints provide an avenue for consumers to voice concerns and seek assistance from a neutral party. These are the foundation for BCS's compliance monitoring of utility performance. Complainants are required by statute and Commission regulations to attempt to resolve problems directly with utilities prior to filing a complaint or requesting a payment arrangement with the PUC. Although exceptions are permitted for extenuating circumstances, BCS generally handles complaints where the utility and its customers could not find mutually satisfactory resolutions to problems.

Contacts to BCS generally fall into three basic categories, including:

- FCRs (First Contact Resolution complaints),
- NFIs (complaints that Need Further Investigation), primarily consisting of Consumer Complaints and Payment Arrangement Requests (PARs), and
- GIs (General Inquiries do not require detailed customer information or investigation).

BCS collectively refers to the FCR and NFI categories as "informal complaints." FCRs in previous reports were formerly referred to as "inquiries." These complaints are informal complaints resolved during the first contact or call-back. FCRs include informal complaints that do not require further investigation on the part of BCS.

BCS reclassified some contacts that originated as NFIs into the General Inquiry (GI) category because it is not appropriate to count these contacts as informal complaints. Examples include complaints that were found to be duplicates, complaints filed against the wrong utility, and complaints where customers had not previously contacted their utilities. GIs may be included within the FCRs. FCRs are excluded from the analysis in this report.

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

In 2022, BCS received 115,609 contacts from consumers including 47,727 contacts that required further investigation (NFIs) and 16,953 FCRs. BCS determined 88% of the 2022 complaints investigated and reviewed were appropriately handled by the subject utilities prior to BCS intervention.

BCS introduced its bilingual Artificially Intelligent Virtual Agent (Aiva) to the PUC website's complaint page in June 2022 and to the BCS Hotline in late July 2022. Aiva facilitates call handling and case intake. Aiva also provides a new option to assist Spanish speaking complainants. Performance statistics for Aiva will be presented in the 2023 UCARE report.

The primary focus of this report is NFI complaints. NFI complaints are categorized as Consumer Complaints and PARs. Consumer Complaints and PARs are taken in by BCS for further investigation. BCS

classifies Consumer Complaints as **disputes** related to utility billing, service delivery and repairs, etc. PARs are classified as contacts where the primary request is to establish payment terms.

## BCS Management of Informal Complaint Data

To manage and use its complaint data effectively, BCS maintains both an internal complaint database and the Consumer Services Information System (CSIS), maintained by the Pennsylvania State University. These systems enable BCS to aggregate and analyze the thousands of informal complaints it receives annually to identify trends and issues. The analysis is used by BCS to generate reports to the Commission, utilities, Legislators, and the public, presenting information regarding utility performance, industry trends, investigations, new policy issues, and the impact of utility or Commission policy.

Most of the data presented in this report is derived from the CSIS database; however, some statistics may be derived from BCS’s complaint database, the Collections Reporting System (CRS), the Local Exchange Carrier Reporting System (LECRS), and the Compliance Tracking System (CTS). The CRS (for electric and gas) and the LECRS (for telecommunications) provide valuable resources for measuring changes in utility collection performance, including the number of residential service terminations. The CTS maintains data about the number and type of apparent infractions attributable to the major utilities.

## BCS Complaints Appealed

The Public Utility Code provides an appeal process for informal complaint decisions when a complainant does not agree with the outcome or result of a BCS determination. Complainants can file a formal appeal and seek a decision from a presiding officer in the PUC’s Office of Administrative Law Judge (OALJ). The following table shows the rate of NFI informal complaints appealed to OALJ and the percentage of BCS informal complaints overturned. The appeal rate is typically below 1% and the percentage of BCS NFI complaints overturned is less than 1%.

### Informal Complaint Appeal Rate

Year	Informal BCS NFI Complaints	BCS NFI Complaints Appealed	Percent of BCS NFI Complaints Appealed	BCS NFI Decisions Overturned by OALJ	Percent Overturned
2018	64,668	597	0.92%	2	0.00%
2019	59,111	511	0.86%	3	0.01%
2020	13,297	401	3.02%	3	0.02%
2021	28,474	244	0.86%	0	0.00%
2022	47,727	403	0.84%	0	0.00%

## BCS Feedback Survey

Through 2021, BCS used a third party to survey a sampling of complainants who have contacted BCS. In a recent internal review of this program, BCS found opportunities to recalibrate the survey process to take advantage of new technology and BCS took the function in-house beginning in 2022. BCS changed the delivery of the surveys from USPS hard copy to electronic methods. This change allowed BCS to separate the Intake function, those staff who open the complaints, from the Investigative function. BCS can more timely survey and monitor each separate role.

The new survey sampling has been significantly increased. In 2021 and prior, there were an average of approximately 5,000 surveys distributed annually. Starting in 2022, BCS has distributed over 31,000 Intake surveys and over 28,000 Investigative surveys. These changes ensure that the surveys represent statistically valid sample size, accurately reflect the performance of all related staff, and align practices with more current and timely survey methods.

The following table presents additional information about how complainants rated the service they received from BCS intake staff in 2022. According to the survey results for the intake staff on the table that follows, 97.8% of complainants who contacted BCS in 2022 rated the person they spoke with on the phone as “very polite” or “fairly polite.”

### Ratings of BCS Service – Intake

How easy was it to reach the PUC's Bureau of Consumer Services (BCS)?	
2022	
Very easy	59.6%
Fairly easy	29.2%
Somewhat Difficult	7.3%
Difficult	3.5%
Don't recall	0.2%
Was this the first time you contacted BCS about this problem?	
2022	
Yes	71.9%
No	25.2%
Don't recall	2.7%
If you contacted BCS by phone, how polite was the first person who helped you?	
2022	
Very polite	93.4%
Fairly polite	4.4%
Not very polite	0.7%
Not at all polite	0.5%
Don't recall	0.2%
Did not speak to a person	0.0%
Did the person seem interested in helping you with your problem?	
2022	
Very interested	86.6%
Fairly interested	10.2%
Not very interested	1.6%
Not at all interested	0.7%
Don't recall	0.3%
Did not speak to a person	0.3%
Do you feel like the person you spoke with at the PUC understood your problem?	
2022	
Yes	96.3%
No	2.6%
Don't recall	0.6%
Did not speak to a person	0.3%

The following table presents additional information about how complainants rated the service they received from BCS investigators in 2019, 2020, 2021 and 2022. According to the survey results for the investigators on the table that follows, 62.9% of complainants who contacted BCS in 2022 rated the BCS’s service as “excellent” or “good.” When asked if they would contact the PUC again for help, 69.0% of complainants said “yes.” BCS found many factors influence the survey results. As an example, oftentimes those who respond to the surveys are individuals who did not receive a favorable informal decision and they are not pleased with the outcome. BCS takes those factors into consideration when looking at the percentages in the tables below.

### Ratings of BCS Service – Investigators

How would you rate the service you received from the PUC (BCS)?				
	2019	2020	2021	2022*
Excellent	48.9%	55.0%	58.4%	51.1%
Good	22.7%	17.5%	24.6%	11.8%
Fair	13.4%	12.8%	8.6%	10.0%
Poor	15.0%	14.8%	8.4%	26.1%
How quickly did the PUC handle your request?				
	2019	2020	2021	2022*
Very quickly	38.6%	43.5%	45.0%	44.3%
Fairly quickly	24.7%	25.4%	35.5%	28.6%
Not very quickly	15.7%	12.7%	7.5%	9.2%
Not at all quickly	15.9%	13.9%	5.4%	9.6%
Don’t recall	2.3%	2.0%	0.6%	1.4%
Have not heard from PUC	2.9%	2.5%	6.2%	6.0%
How easy to understand was the information the PUC gave you in writing?				
	2019	2020	2021	2022*
Very easy	44.9%	41.9%	59.4%	38.4%
Fairly easy	19.1%	20.7%	19.6%	14.4%
Not very easy	3.5%	3.0%	3.6%	3.3%
Not at all easy	2.5%	2.0%	2.1%	4.8%
Don’t recall	3.2%	7.7%	1.6%	2.5%
Did not receive anything in writing	26.9%	24.7%	13.7%	35.2%
If you had another problem with a utility, would you contact the PUC again?				
	2019	2020	2021	2022*
Yes	81.0%	77.8%	85.0%	69.0%
No	7.2%	10.2%	5.7%	14.0%
Not sure	11.8%	12.0%	9.3%	16.1%

\*The survey process was brought in-house in 2022 where the delivery methods were changed from hard copy to electronic and survey sampling was drastically increased.

## Complaints Excluded from Analysis by BCS

The majority of contacts and complaints taken in by BCS fall into the categories described earlier in this chapter. However, certain contacts to BCS fall into categories that were excluded from the analyses later in this report. Examples of contacts and complaints that were excluded include:

- non-jurisdictional complaints,
- information requests that did not require investigation, and
- complainants who did not contact the utility prior to contacting the Commission.

**Commercial** complaints were also excluded from the data used in the analyses. Although BCS's regulatory authority has largely been confined to residential accounts, the Bureau handled 1,399 complaints from commercial complainants in 2022, including 384 complaints related to loss of utility service.

## Mediated Complaints Sent to OALJ from BCS

Residential complaints always outnumber commercial complaints to BCS and BCS typically has limited jurisdiction in commercial complaint matters. BCS investigators may attempt to mediate a mutually acceptable agreement between the commercial complainant and the utility. Many commercial complaints are referred to the Office of Administrative Law Judge's Mediation Unit for Alternative Dispute Resolution or they may choose to file a formal complaint by contacting the Secretary's Bureau.

## Mediated Complaints Sent to OALJ from BCS

ELECTRIC				
	2019	2020	2021	2022
Duquesne	13	12	7	12
Met-Ed	13	10	8	18
PECO+	13	6	3	27
Penelec	7	3	7	14
Penn Power	5	7	5	12
PPL	21	4	3	12
UGI-Electric	3	0	3	2
West Penn	6	5	11	18
GAS				
	2019	2020	2021	2022
Columbia	2	1	0	2
NFG	1	0	1	1
Peoples	0	2	4	3
Peoples-Equitable*	3	n/a	n/a	n/a
PGW	3	6	18	25
UGI Gas	12	12	4	23
UGI North**	2	n/a	n/a	n/a
WATER				
	2019	2020	2021	2022
Aqua	5	0	6	3
PAWC	7	14	13	8
Audubon	0	0	0	0
Columbia	0	0	0	0
Community Utilities	0	0	0	0
Newtown Artesian	0	0	0	0
Veolia Bethel	0	0	0	0
Veolia PA	0	2	1	0
York	0	0	0	0
MUNICIPAL				
	2019	2020	2021	2022
PWSA-Water	7	5	4	1
PWSA-Sewer	3	0	0	4
TELECOMMUNICATIONS				
	2019	2020	2021	2022
Brightspeed f/k/a CenturyLink	1	1	0	0
Frontier Commonwealth	0	0	1	0
Verizon North	1	0	0	0
Verizon PA	19	3	5	3
Windstream	0	1	1	0

+ PECO statistics include electric and gas.

\* Due to the Peoples Natural Gas merger, effective Jan. 1, 2020, the Peoples data includes Peoples-Equitable.

\*\* Due to the UGI Gas merger, effective Jan. 1, 2020, the UGI Gas data includes UGI Central and UGI North.

### 3. Categories of Residential Consumer Complaints

#### Total Volume

The following table compares the volume of all residential NFI complaints to the volume of all commercial NFI complaints handled by BCS in 2022.

**Total Volume of NFIs  
Consumer Complaints and Payment Arrangement Requests (PARs) to BCS in 2022\***

Industry	Consumer Complaints		Payment Arrangement Requests	
	Residential	Commercial**	Residential	Commercial**
Electric	6,868	587	23,058	201
Gas	2,423	168	9,408	167
Water	1,234	102	1,991	15
Telecommunications	1,201	148	13	0
Other***	117	10	15	1
<b>Total</b>	<b>11,843</b>	<b>1,015</b>	<b>34,485</b>	<b>384</b>

\* This table represents “investigated complaints” only, and not those complaints handled on the first call.

\*\* All complaints that involved commercial accounts were deleted from the analyses in the subsequent chapters.

\*\*\* Wastewater and steam heat complaints are designated as “other” in this table and the tables that follow.

#### Consumer Complaints Analyzed by BCS

Most Consumer Complaints regarding the electric, gas, water, wastewater and steam heat industries deal with matters covered in Chapter 14 the Responsible Utility Customer Protection Act, and Chapter 56 Standards and Billing Practices for Residential Utility Service.

For the telecommunications industry, most of the complaints found in the Consumer Complaint category deal with matters covered by Chapter 30, Alternative Form of Regulation of Telecommunications Services, Chapters 63 and/or 64, Telephone Service and Standards and Billing Practices for Residential Telephone Service. Most Consumer Complaints represent complainants who contacted the Commission when they were unable to reach a mutually satisfactory resolution with the utility.

## Consumer Complaints by Industry\* 2019-22

Industry	2019	2020	2021	2022
Electric	8,007	4,568	5,421	7,455
Gas	2,579	1,355	1,836	2,591
Water	1,194	1,055	1,370	1,336
Telecommunications	1,445	1,337	1,708	1,349
Other	75	53	42	127
<b>Total</b>	<b>13,300</b>	<b>8,368</b>	<b>10,377</b>	<b>12,858</b>

\* Table includes both residential and commercial Consumer Complaints.

As shown in the table above, electric and gas utilities accounted for 78% of all Consumer Complaints investigated by BCS in 2022.

In 2022, 58% of these complaints were electric (7,455 complaints) and 20% of these complaints were natural gas (2,591 complaints), while telecommunications utilities totaled approximately 10% (1,349 complaints), and water utilities accounted for 10% (1,336 complaints).

The following table presents a comparison of the number of residential and commercial Consumer Complaints for 2019, 2020, 2021 and 2022.

### Consumer Complaints to BCS in 2019-22

Industry	Consumer Complaints							
	Residential				Commercial			
	2019	2020	2021	2022	2019	2020	2021	2022
Electric	7,680	4,280	5,056	6,868	327	288	365	587
Gas	2,455	1,299	1,722	2,423	124	56	114	168
Water	1,106	979	1,272	1,234	88	76	98	102
Telecommunications	1,279	1,238	1,566	1,201	166	99	142	148
Other	70	48	41	117	5	5	1	10
<b>Total</b>	<b>12,590</b>	<b>7,844</b>	<b>9,657</b>	<b>11,843</b>	<b>710</b>	<b>524</b>	<b>720</b>	<b>1,015</b>

### Classification of Consumer Complaints

BCS categorizes residential complaints into 14 categories for each of the electric, gas, and water utilities and 11 categories for each of the telecommunications utilities. Tables showing the percent of complaints in each category appear in the following industry chapters. The tables represent all of the complaints that were evaluated by BCS staff. BCS analyzes the categories that generate the most complaints



or problems and often discusses its findings with individual utilities and works with them to make necessary revisions to their complaint handling procedures.

## Payment Arrangement Requests

PARs are requests for payment arrangement terms that fall into one of the following situations:

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

Act 201 of 2004<sup>4</sup> changed the rules that apply to cash deposits, reconnection of service, termination of service, payment arrangements, and the filing of termination complaints by consumers for electric, gas and water. The goal was to increase timely collections while ensuring that service is available to all customers based on equitable terms and conditions.<sup>5</sup> The law is applicable to Electric Distribution Companies (EDCs), water distribution utilities, and Natural Gas Distribution Companies (NGDCs) with an annual operating income in excess of \$6 million.<sup>6</sup> On Oct. 22, 2014, Chapter 14 was revised and renewed for a period of 10 years. On Feb. 28, 2019, the Commission amended Chapter 56 to make the regulations consistent with the Chapter 14 updates.<sup>7</sup> BCS is required to provide a report detailing the impact of Chapter 14 every five years. The recent quinquennial report, *The Sixth Report to The General Assembly and The Governor Pursuant to Section 1415 – Implementation of Chapter 14*, was provided to the General Assembly and the Governor on Jan. 31, 2020.<sup>8</sup> The next report is due in December 2024, the same year the general assembly must renew Chapter 14 before it expires.

Telecommunications utilities are not covered by Chapter 14. For the telecommunications industry, most of the complaints found in the PAR category deal with matters covered by Chapter 30, Alternative Form of Regulation of Telecommunications Services, Chapters 63 and/or 64, Telephone Service and Standards and Billing Practices for Residential Telephone Service. For the telecommunications industry, PARs are principally contacts to BCS or to utilities involving a request for payment terms for arrearages associated with basic service. Although Chapter 64 uses the term “payment agreement,” “payment arrangement” has been used throughout this report for consistency.

All of the measures in this report pertaining to PARs are based on assessments of contacts to BCS from individual complainants. As with Consumer Complaints, almost all complainants contacted their utility prior to contacting BCS. During 2022, BCS handled 34,869 PARs from customers of the utilities under the Commission’s jurisdiction.

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<sup>4</sup> 66 Pa. C.S. § 1401-1418

<sup>5</sup> 66 Pa. C.S. § 1402

<sup>6</sup> Small natural gas distribution utilities may voluntarily “opt in” to Chapter 14. 66 Pa. C.S. § 1403.

<sup>7</sup> Docket No. L-2015-2508421, published in Pennsylvania Bulletin June 1, 2019.

<sup>8</sup> [http://www.puc.pa.gov/general/publications\\_reports/pdf/Chapter14-Biennial013020.pdf](http://www.puc.pa.gov/general/publications_reports/pdf/Chapter14-Biennial013020.pdf)

## Payment Arrangement Requests (PARs) by Industry\* 2019-22

Industry	2019	2020	2021	2022
Electric	30,055	2,768	11,244	23,259
Gas	12,054	1,449	5,237	9,575
Water	3,628	674	1,592	2,006
Telecommunications	23	13	13	13
Other	51	25	11	16
<b>Total</b>	<b>45,811</b>	<b>4,929</b>	<b>18,097</b>	<b>34,869</b>

\* Table includes both residential and commercial PARs.

As in past years, most requests for payment arrangements in 2022 involved electric or gas utilities. As shown in the table above, 67% (23,259 complaints) of PARs in 2022 were from electric customers and 27% (9,575 complaints) were from gas customers. Also, 6% (2,006 complaints) of PARs in 2022 came from customers of various water utilities and 1% (16 complaints) of PARs in 2022 came from telecommunications customers. The following table presents a comparison of the number of residential and commercial PARs for 2019, 2020, 2021 and 2022.

## Payment Arrangement Requests (PARs) to BCS in 2019-22

Industry	Payment Arrangement Requests							
	Residential				Commercial			
	2019	2020	2021	2022	2019	2020	2021	2022
Electric	29,907	2,731	11,028	23,058	148	37	216	201
Gas	11,931	1,421	5,095	9,408	123	28	142	167
Water	3,604	668	1,578	1,991	24	6	14	15
Telecommunications	23	12	13	13	0	1	0	0
Other	49	25	10	15	2	0	1	1
<b>Total</b>	<b>45,514</b>	<b>4,857</b>	<b>17,724</b>	<b>34,485</b>	<b>297</b>	<b>72</b>	<b>373</b>	<b>384</b>

With respect to the commercial cases, BCS cannot make payment arrangements for those accounts. Due to its limited jurisdiction over commercial cases, BCS does not issue decisions regarding commercial disputes with no residential end use. Instead, BCS investigators give commercial customers information regarding the utility position or attempt to mediate a mutually acceptable agreement regarding the disputed matter. Many such cases are referred to the Office of Administrative Law Judge's Mediation Unit for Alternative Dispute Resolution where an attempt is made to mediate a resolution between the utility and its customer.

## First Contact Resolution (FCR) Complaints

Formerly labeled as “Inquiries,” the total number of FCRs BCS received in 2022 was 16,953. FCRs are contacts that did not require follow-up investigation beyond the initial contact or call-back. The FCRs for 2022 include contacts to the BCS via the Consumer Complaint Hotline, mail, website, fax and email.

BCS classifies certain PARs as FCRs; therefore, they are not represented in the number of PARs in the tables in this report. For example, BCS does not issue payment decisions for complainants that are actively enrolled in utility Customer Assistance Programs (CAPs) or requests to restore or avoid suspension / termination of toll or non-basic telecommunications service. Similarly, if a complainant has recently been through the BCS payment arrangement process and calls again with a new request, without a change in income or significant change in circumstances<sup>9</sup>, BCS does not open a new PAR complaint for investigation (NFI/PAR). In these instances, BCS dismisses the complaint at the initial contact and classifies the contact as an FCR.

As previously mentioned, BCS reclassified some contacts that originated as NFIs into the General Inquiry (GI) category. The GIs are excluded from analysis within this report. They are not counted as informal complaints. Reclassified GIs (1,231 complaints in 2022) accounted for 7% of FCRs in 2022 and are included in the tables below.

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<sup>9</sup> 66 Pa.C.S. § 1402 Definitions of “Change in Income” and “Significant Change in Circumstance” in conjunction with 66 Pa.C.S. § 1405 Payment Arrangements.

## FCR Reason for Contact Categories in 2022

Reason for Contact	Number	Percent*
Termination or suspension of service	3,532	20.8%
PUC has no jurisdiction	2,517	14.9%
Unable to open new PAR – service on	2,125	12.5%
Request for general information	1,465	8.6%
CAP inquiry/contact	1,344	7.9%
Billing dispute	1,081	6.4%
Competition issues and requests for information	671	4.0%
Rate protest	468	2.8%
Service (utility facilities)	419	2.5%
Applicant/deposit issue	400	2.4%
People-delivered utility service**	282	1.7%
Unable to open new PAR – service off	128	0.8%
Weather outage	17	0.1%
Rate complaint	0	0.0%
Cramming**	0	0.0%
Slamming**	0	0.0%
Other miscellaneous reasons***	1,445	8.5%
Reason for contact is not available	1,059	6.3%
<b>Total</b>	<b>16,953</b>	<b>100.2%</b>

\* Total percent may be more or less than 100% due to rounding.

\*\* Please refer to the Glossary of Terms.

\*\*\* Some of the Other category includes contacts related to Sales Issues, Lifeline/Link-up, Healthcare facilities, etc.

## 4. Commodity Supplier Activity

### Electric and Natural Gas Supplier Activity

Deregulation of the electric and natural gas supply industries occurred in Pennsylvania through the passage of the Electricity Generation Customer Choice and Competition Act in 1996 and the Natural Gas Choice and Competition Act in 1999. Prior to the enactment of these laws, customers in Pennsylvania procured their electricity and/or natural gas from utility companies that generated, transmitted and distributed the energy to the customer. Under energy competition, consumers in Pennsylvania have the choice to purchase electricity and/or natural gas from a supplier that is a different company than the utility; thereby allowing the consumer to choose their energy supply based on several factors, including price, or in the case of electricity, by the source of the power supplied to the customer. Currently, Pennsylvania has a robust competitive energy supply market, with over 450 electric generation suppliers and over 335 natural gas suppliers licensed with the Commission. In 2022, on average, over 1.2 million residential electric customers and over 330,000 natural gas customers were served by competitive suppliers.

As indicated in the following table, in 2022 BCS received 2,845 contacts related to competitive supplier issues in the energy industries.

#### All Competition-Related Contacts by Industry 2019-22

Industry	2019	2020	2021	2022
Electric	3,490	2,353	1,954	2,465
Gas	454	307	294	380
<b>Total</b>	<b>3,944</b>	<b>2,660</b>	<b>2,248</b>	<b>2,845</b>

Of the 2,845 total contacts received about competitive supplier issues in 2022, 955 or 34% pertained to slamming. Slamming is the illegal practice of switching a customer's supplier or provider without permission. The following table presents the number of slamming NFI complaints received by BCS.

#### Slamming NFIs (Consumer Complaints and PARs) by Industry 2019-22

Industry	2019		2020		2021		2022	
	Residential	Commercial	Residential	Commercial	Residential	Commercial	Residential	Commercial
Electric	912	50	562	44	533	60	654	93
Gas	102	1	76	3	87	7	106	13
<b>Total</b>	<b>1,014</b>	<b>51</b>	<b>638</b>	<b>47</b>	<b>620</b>	<b>67</b>	<b>760</b>	<b>106</b>

There were 866 NFI complaints about slamming in 2022. Residential consumers filed 760 NFI complaints or 88%, commercial consumers filed the remaining 106 or 12% of slamming NFIs. Of the residential slamming NFIs, 654 were from the electric industry and 106 were from the natural gas industry.

The Commission views slamming as a very serious violation of consumer regulations and has articulated a “zero tolerance” policy against slamming.<sup>10</sup>

Appendix D-1 identifies the types of competition complaints tracked by BCS. In addition to slamming, bill disputes are prevalent among competition complaints to BCS.

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<sup>10</sup> L-00970121, Public Meeting of May 21, 1998.

# 5. Residential Consumer Complaints from Non-Major Utilities

## Residential Consumer Complaints for Non-Major Utilities

Historically, the primary focus of BCS’s review of utilities’ complaint handling has been on the performance of the major electric, gas, water and telecommunications utilities. For the past several years a limited amount of complaint information for the non-major utilities and the other service providers was included in the UCARE report.

Utilities are considered a non-major utility in the following circumstances. A non-major electric utility is an EDC with less than 100,000 residential customers or an electric generation supplier (EGS). A non-major gas utility is an NGDC with less than 100,000 residential customers or a natural gas supplier (NGS). A non-major water utility is a municipal water utility or a non-municipal water utility with revenues of either less than \$1 million annually or greater than \$1 million annually for no more than two consecutive years. A non-major telecommunications utility is an Incumbent Local Exchange Carrier (ILEC) that served less than 50,000 residential customers, a competitive local exchange carrier, a long-distance company, an IXC, a reseller, or an eligible telecommunications carrier.

In 2022, BCS observed a decrease in the overall number of residential Consumer Complaints for the non-major utilities when compared with the pre-pandemic year of 2019, with the exception of the non-major telecommunication utilities.

### Residential Consumer Complaints by Industry for Non-Major Utilities\* 2019-22

Industry	2019	2020	2021	2022
Electric	1,690	1,188	1,028	1,522
Gas	381	210	228	297
Water	31	27	22	13
Telecommunications	87	134	145	139
<b>Total</b>	<b>2,189</b>	<b>1,559</b>	<b>1,423</b>	<b>1,971</b>

\* See Appendix C.

BCS staff investigated the total number of Consumer Complaints with the non-major utilities, including suppliers, under the Commission’s jurisdiction. The majority of complaints against non-major utilities involved slamming and billing disputes. These two complaint categories accounted for:

- 69% of non-major electric utility complaints
- 63% of non-major gas utility complaints
- 38% of non-major water utility complaints
- 15% of non-major telecommunications utility complaints

Appendix C presents a summary of the residential informal complaints (Consumer Complaints and PARs) that are not included in the analysis within the electric, gas, water and telecommunications chapters. The table lists the non-major utilities for these industries, the electric generation and natural gas suppliers and providers of telecommunications services that had five or more residential Consumer Complaints in 2022.



## 6. Performance Measures

Informal complaints are an indicator of utility complaint-handling performance. Utility customers are required to contact their utility about a problem prior to contacting BCS. BCS reviews utility records to evaluate the handling of each complaint. The informal compliance evaluation process includes several assessments that form the basis of the performance measures presented in the industry chapters of this report<sup>11</sup>, with the exception of the number of terminations and termination rate. Many of the performance measures are shown as rates, calculated per 1,000 residential customers. Appendix A provides the number of residential customers for the major companies in each of the industries in 2019, 2020, 2021 and 2022.

### Informal Compliance Process and Infractions

The BCS informal compliance evaluation process includes notifying a utility of an alleged infraction or violation of a statute or regulation and provides written clarifications of Chapters 14, 30, 56, 63 or 64 and the policies of the Commission and BCS.

The utility has an opportunity to respond and may dispute the infraction by providing details and supporting documentation to disprove the infraction. BCS provides a final determination to the utility regarding the infraction. If the information about the infraction is accurate, BCS expects the utility to take corrective action to address the problem or any deficiencies that led to the infraction. Examples of corrective action may include modification of a system or correction of a systems issue; revision of utility procedures/practices, the text of a notice, bill or letter; and/or additional staff training.

The informal compliance process is designed to help BCS identify systemic errors and to ensure compliance by the utilities. One example of a systemic error is a termination notice that does not comply with the requirements of Chapter 56. Each recipient of the notice is affected by that error. When an error is discovered, BCS requires utilities to investigate the scope of the problem and take corrective action.

### Total Complaint Rate

The Total Complaint Rate is the number of all complaints (FCRs and NFIs combined) for each 1,000 residential customers. This calculation allows the reader to make comparisons among utilities of various sizes of the overall BCS activity.

### Consumer Complaint Rate

The calculation of the Consumer Complaint rate (Consumer Complaints per 1,000 residential customers) permits the reader to make comparisons among utilities of various sizes. Consumer Complaint rates and statistically significant changes in Consumer Complaint rates from one year to the next are often indicative of patterns and trends that it should investigate. BCS considers the “justified Consumer Complaint

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<sup>11</sup> It is important to note that this is not the only report BCS produces to assess utility performance. For example, residential termination and reconnection statistics for electric, gas, and water utilities are reported by the utilities as required by Chapter 56 at § 56.231 and posted on the PUC website at <https://www.puc.pa.gov/filing-resources/reports/terminations-for-electric-gas-water-companies/>.

rate” (justified Consumer Complaints per 1,000 residential customers) a better indicator of a utility’s complaint handling performance.

## **Justified Consumer Complaint Rate**

BCS policy analysts review a statistically valid sampling of complaints and utility records to determine if the utility took appropriate action when handling its consumer contacts. BCS uses the complaint evaluation process to identify whether the utility followed the correct procedures prior to the intervention of BCS. This approach focuses strictly on the utility’s compliance with applicable statutes and regulations.

A complaint is considered “justified” if it is found that the utility did not comply with Commission Orders, policies, regulations, reports, Secretarial Letters or tariffs. The “justified Consumer Complaint rate” reflects both volume and percent of complaints found justified. It is the number of justified consumer complaints per 1,000 residential customers. The justified consumer complaint rate is a normalized ratio useful for comparing utility performance over time among the various utility companies.

BCS monitors the complaint rates and justified rates of the major utilities. When BCS finds below-average performance, it may indicate improper dispute handling. In the industry chapters that follow, BCS compares the Consumer Complaint rates, the justified Consumer Complaint rates, and the overall percent of justified Consumer Complaints of the major utilities.

## **Percent of Justified Consumer Complaints**

The percent of justified Consumer Complaints is the estimated number of justified complaints divided by the total number of complaints received. This measures all of the complaints, rather than the statistically valid sample of complaints evaluated.

## **Response Time to Consumer Complaints**

When a consumer contacts BCS with a complaint about a utility, the utility is notified. The utility sends BCS the record of its contacts with the complainant about that specific complaint. The utility has up to 30 days to send BCS its initial informal complaint report or up to five days if the complainant is without service.

“Response time” is the number of days from the date BCS first contacts the utility regarding a complaint to the date on which the utility provides BCS with its initial informal complaint report. Response time quantifies the speed of a utility’s response to BCS Consumer Complaints.

Average response time includes all residential EDC Consumer Complaints except complaints processed through CURE (Customer & Utility Resolution Effort). CURE is a voluntary program designed to better manage workload, improve customer satisfaction, and reduce costs. The utility contacts the complainant and attempts to achieve a resolution. If mutual satisfaction is reached, the utility and complainant notify BCS the informal complaint can be closed without further investigation, and the utility isn’t required to submit a full utility report.

In the following industry chapters, response time is presented as the average of a utility’s responses in the tables titled Average Response Time to BCS.

## Payment Arrangement Request (PAR) Rate

BCS may offer a payment arrangement to a complainant in accordance with Chapter 14. The volume of PARs may fluctuate from year to year, or even from month to month, depending upon utility collection strategies and economic factors. The calculation of the PAR rate (PARs per 1,000 residential customers) permits the reader to make comparisons among utilities. Unusually high or low rates and significant changes in rates from one year to the next may indicate areas that need further investigation or Commission action.

## Justified Payment Arrangement Request (PAR) Rate

The justified payment arrangement request (PAR) rate is a normalized ratio useful for comparing utility performance among the various utility companies.

Many PARs to BCS are undisputed, with no other problem associated with the request. There is an automated process for the majority of these complaints that BCS refers to as AutoPAR. *AutoPARs are not evaluated, therefore, they are not included in the estimated number of justified complaints. AutoPARs are included in the total number of PAR complaints received by BCS.*

In complaints where the utility claims there are disputed factors in addition to the PAR or a complainant is ineligible for a PUC payment plan, a BCS investigator reviews the record manually and issues a decision or determination.

In an evaluation of a statistically valid sampling of disputed PAR complaints, BCS policy analysts determine if the utility complied with regulations and statutes. BCS monitors the justified PAR rates for below-average performance and improper dispute handling. These are the complaints that appear in the justified PAR tables within this report. The justified PAR rate is the ratio of the estimated number of justified PARs per 1,000 residential customers. In the chapters that follow, BCS compares the justified PAR rates of the major utilities.

## Percent of Justified Payment Arrangement Requests (PARs)

The percent of justified PARs is the estimated number of justified complaints divided by the total number of PAR complaints received. The measure takes into account all of the complaints, including AutoPARs, rather than the statistically valid sample of PAR complaints evaluated in the informal compliance process.

## Response Time to Payment Arrangement Requests

When a complainant contacts BCS for a PAR, BCS notifies the utility. The utility sends BCS the record of its contacts with the complainant about that specific concern, including the results of the most recent payment negotiation, if any. The utility has up to 30 days to send BCS its initial informal complaint report or up to five days if the complainant is without service.

“Response time” is the number of days from the date BCS first contacts the utility regarding a complaint to the date the utility provides BCS with its initial informal complaint report. Response time quantifies the speed of a utility’s response to BCS PAR complaints.

The calculation for average response excludes undisputed PARs and CURE complaints. CURE is a voluntary program designed to better manage workload, improve customer satisfaction, and reduce costs. The utility contacts the complainant and attempts to achieve a resolution. If mutual satisfaction is reached, the

utility and complainant notify BCS the informal complaint can be closed without further investigation, and the utility isn't required to submit a full utility report.

In the following industry chapters, response time is presented as the average of a utility's responses in the tables titled Average Response Time to BCS.

## Termination Rate

The termination statistics and the number of residential customers for the electric, gas and water utilities are drawn from reports required by Chapter 56 at § 56.231. Telecommunications termination statistics and number of residential customers are drawn from reports required by Chapter 64 at § 64.201.

BCS views termination of utility service as a utility's last resort when customers fail to meet their payment obligations. The "termination rate" allows the reader to compare termination activity between utilities.

Previously the termination rate for the telecommunications industry was calculated in the UCARE reports as the number of terminations for each 1,000 residential customers; however, the termination rate for the telecommunications industry is now being calculated consistent with the other industries as defined below.

The termination rate for all industries is the number of service terminations divided by the number of residential customers.

## Infraction Rate

BCS compares utilities of various sizes within an industry by using a measure called the infraction rate. The infraction rate is the number of verified infractions for each 1,000 residential customers.

The infraction rate tables in the chapters that follow do not show the causes of the individual infractions, repetitive occurrences due to systemic issues or indicate the level of seriousness of infractions related to health and safety.

This compliance measure shows industry trends over time. Generally, trends may change as complaints for that year continue to be evaluated into the new year, and utilities may subsequently challenge a BCS determination. For example, complaints closed in November and December may not be evaluated by BCS until the new year, and utilities may subsequently challenge BCS infractions. Thus, the total number of infractions for the year may change from the number cited in the current report. BCS will update the 2022 infraction rates in the 2023 report.

Infraction rates are shown for 2019, 2020, 2021 and 2022 in the upcoming industry chapters. The electric, gas, and water industry chapters show the 2022 infractions of Chapter 56, Chapter 14 and other regulations, and the telecommunications industry chapter shows the infractions of Chapters 30, 63, 64 and other regulations.

## BCS Performance Measures and Industry Chapters

The tables in the following industry chapters present the data alphabetically by utility name for major utilities, as defined within the sections.

## Universal Service and Energy Conservation Programs / Other Low-Income Programs

Universal service and energy conservation programs help utility customers maintain service and conserve energy. While not a performance measure that is reviewed during the compliance evaluation process, BCS monitors and evaluates these programs to help the Commission fulfill its oversight responsibilities, increasing the effectiveness of utility collections while protecting the public's health and safety.

Electric and gas universal service programs include: Customer Assistance Programs (CAP); Low-Income Usage Reduction Programs (LIURP); Hardship Fund Programs; and Customer Assistance and Referral Evaluation Services (CARES) programs. An explanation of each of these programs is included in the Glossary of Terms.

In September 2023, the Commission released the 23rd annual report on Universal Service Programs and Collections Performance, which presents 2022 universal service and collections data for the major electric and natural gas distribution companies. The Universal Service Programs and Collections Performance reports are available on the Commission's website at: <https://www.puc.pa.gov/filing-resources/reports/universal-service-reports/>

Water and telecommunications utilities also offer programs to assist low-income customers. At the end of the water and telecommunications chapters that follow, readers will find highlights of these programs.

## 7. Electric Industry

In 2022, the Commission had jurisdiction over 15 electric distribution companies (EDCs). The majority of Consumer Complaints and PARs are about the seven major EDCs: Duquesne Light Co. (**Duquesne**), PECO Energy Co. (**PECO**), PPL Electric Utilities Inc. (**PPL**), and the four FirstEnergy companies – Metropolitan Edison Co. (**Met-Ed**), Pennsylvania Electric Co. (**Penelec**), Pennsylvania Power Co. (**Penn Power**), and West Penn Power Co. (**West Penn**). This chapter will focus exclusively on those seven utilities.

The statistics in the tables on the pages that follow depict the performance of each of the seven major electric utilities in 2022. The major electric utilities are those that have more than 100,000 residential customers. The tables in this chapter also include UGI-Electric, a large non-major EDC with fewer than 100,000 residential customers. In some circumstances, statistics for the non-major utilities can skew the industry averages in ways that do not fairly represent industry performance. For this reason, BCS excluded the statistics involving UGI-Electric when it calculated the electric industry averages. PECO’s statistics include data for both electric and gas service. BCS also removed supplier complaints from the data it used to prepare the tables on Consumer Complaints and PARs and addresses these complaints in a separate section of the report.

### Total Complaint Rate

The following table shows the Total Complaint Rate, which is the number of all complaints (FCRs and NFIs combined) for each 1,000 residential customers.

**2019-22 Residential Total Complaint Numbers/Rates  
Major Electric Distribution Companies**

Utility	2019		2020		2021		2022	
	Number	Rate	Number	Rate	Number	Rate	Number	Rate
Duquesne	3,166	5.88	843	1.56	2,612	4.81	3,646	6.68
Met-Ed	6,156	12.20	1,210	2.38	2,132	4.16	3,977	7.72
PECO+	11,000	7.31	2,309	1.52	4,338	2.83	9,492	6.17
Penelec	6,642	13.26	1,107	2.21	2,242	4.47	4,357	8.70
Penn Power	1,918	13.14	284	1.93	594	4.01	1,329	8.92
PPL	10,906	8.84	1,807	1.45	4,464	3.57	7,348	5.85
UGI-Electric	825	14.96	191	3.47	278	5.05	708	12.84
West Penn	7,414	11.82	1,223	1.94	2,433	3.85	4,756	7.53
<b>Total</b>	<b>48,027</b>		<b>8,974</b>		<b>19,093</b>		<b>34,905</b>	
<b>Average of Rates*</b>		<b>9.33</b>		<b>1.86</b>		<b>3.68</b>		<b>6.79</b>

\* Does not include UGI-Electric.

+ PECO statistics include electric and gas.

## Consumer Complaints

During 2022, BCS handled 6,868 Consumer Complaints from residential electric consumers of the various EDCs (5,353) and EGSs (1,515). The seven major EDCs represented 76% (5,234) of the total Consumer Complaints.

## Consumer Complaint Categories

The following table shows the number and percentage of 2022 complaints in each of the 14 categories used by BCS policy analysts for compliance evaluation. These categories are for all evaluated residential complaints filed with BCS.

Of the 2,956 Consumer Complaints evaluated, the top three categories of EDC complaints for 2022 account for 41% of the total: 21% billing disputes, 10% service interruptions, and 10% termination or PAR procedures. See Appendix D-1 for an explanation of complaint categories.

**Number and Percent of Consumer Complaints by Dispute Category**  
**2022 Complaints Evaluated\***  
**Major Electric Distribution Companies**

Category**	Duquesne	Met-Ed ***	PECO+ ***	Penelec ***	Penn Power	PPL***	UGI- Electric	West Penn ***	Electric Industry ****
Billing Disputes	114	83	105	103	27	118	38	72	<b>622</b>
	24%	19%	23%	21%	19%	25%	38%	15%	<b>21%</b>
Service Interruptions	43	52	22	50	6	43	3	92	<b>308</b>
	9%	12%	5%	10%	4%	9%	3%	19%	<b>10%</b>
Termination or PAR Procedures	73	42	43	49	11	44	8	27	<b>289</b>
	15%	9%	9%	10%	8%	9%	8%	6%	<b>10%</b>
Service Quality	29	39	42	48	18	32	5	52	<b>260</b>
	6%	9%	9%	10%	13%	7%	5%	11%	<b>9%</b>
Personnel Problems	42	29	57	42	9	40	3	29	<b>248</b>
	9%	7%	12%	9%	6%	9%	3%	6%	<b>8%</b>
Credit and Deposits	14	53	20	35	17	7	8	46	<b>192</b>
	3%	12%	4%	7%	12%	2%	8%	10%	<b>7%</b>
Discontinuance/ Transfer	27	25	30	26	7	25	10	21	<b>161</b>
	6%	6%	7%	5%	5%	5%	10%	4%	<b>5%</b>
Other Payment Issues	28	16	13	25	7	36	4	22	<b>147</b>
	6%	4%	3%	5%	5%	8%	4%	5%	<b>5%</b>
Scheduling Delays	20	17	11	10	9	16	0	17	<b>100</b>
	4%	4%	2%	2%	6%	3%	0%	4%	<b>3%</b>
Metering	17	12	16	21	2	13	6	11	<b>92</b>
	4%	3%	4%	4%	1%	3%	6%	2%	<b>3%</b>
Damages	5	20	15	14	3	14	1	18	<b>89</b>
	1%	4%	3%	3%	2%	3%	1%	4%	<b>3%</b>
Service Extensions	2	1	2	1	0	4	0	4	<b>14</b>
	<1%	<1%	<1%	<1%	0%	1%	0%	1%	<b>&lt;1%</b>
Rates	0	0	3	2	1	1	1	3	<b>10</b>
	0%	0%	1%	<1%	1%	<1%	1%	1%	<b>&lt;1%</b>
All Other Problems	65	57	78	58	22	75	12	69	<b>424</b>
	14%	13%	17%	12%	16%	16%	12%	14%	<b>14%</b>
<b>Total*</b>	<b>479</b>	<b>446</b>	<b>457</b>	<b>484</b>	<b>139</b>	<b>468</b>	<b>99</b>	<b>483</b>	<b>2,956</b>

\* Based on residential complaints opened in 2022 and evaluated by BCS as of May 5, 2023.

\*\* Categories are for all evaluated residential complaints filed with BCS. See Appendix D-1 for an explanation of complaint categories.

\*\*\* Based on a probability sample of complaints.

\*\*\*\* Electric Industry column does not include UGI-Electric.

+ PECO statistics include electric and gas.



## Consumer Complaint Rate, Justified Consumer Complaint Rate, and Percent of Justified Consumer Complaints

The following tables show the Consumer Complaint Rate, the Justified Consumer Complaint Rate, and the Percent of Justified Consumer Complaints for each major EDC in 2019, 2020, 2021 and 2022. A complaint is considered “justified” if it is found that the utility did not comply with Commission Orders, policies, regulations, reports, Secretarial Letters, or tariffs. BCS evaluates a statistically valid sampling of complaints for each utility.

The Consumer Complaint rate is the number of Consumer Complaints for each 1,000 residential customers.

The justified Consumer Complaint rate is the estimated number of justified Consumer Complaints for each 1,000 residential customers based on a statistically valid sampling of complaints. The justified Consumer Complaint rate is a normalized ratio useful for comparing utility performance among the various companies. It is not a percentage.

From 2019 to 2022, the justified Consumer Complaint rates for PECO, Penelec and West Penn increased, the rates for Duquesne and Met-Ed remained stable, and the rates decreased for Penn Power, PPL and UGI-Electric. The 2022 justified Consumer Complaint rates for Duquesne, Met-Ed, PECO, Penelec and West Penn were greater than the 2022 industry average.

The percent of justified Consumer Complaints is the estimated number of justified complaints divided by the total number of complaints received (multiplied by 100). The percent of justified Consumer Complaints represents a utility’s individual performance.

### 2022 Residential Consumer Complaint Rate, Justified Consumer Complaint Rates, and Percent of Justified Consumer Complaints Major Electric Distribution Companies

Utility	Consumer Complaint Rate	Justified Consumer Complaint Rate	Percent of Justified Consumer Complaints
Duquesne	1.17	0.12*	10.5%*
Met-Ed	1.23	0.11*	9.1%*
PECO+	1.05	0.12*	11.6%*
Penelec	1.24	0.11*	8.9%*
Penn Power	1.14	0.07	6.5%
PPL	0.64	0.04*	6.0%*
UGI-Electric	2.03	0.09	4.5%
West Penn	1.19	0.12*	9.7%*
<b>Average**</b>	<b>1.09</b>	<b>0.10</b>	<b>9.5%</b>

\* Based on a probability sample of complaints.

\*\* Does not include UGI-Electric.

+ PECO statistics include electric and gas.

## 2019-22 Residential Consumer Complaint Numbers/Rates Major Electric Distribution Companies

Utility	2019		2020		2021		2022	
	Number	Rate*	Number	Rate*	Number	Rate*	Number	Rate*
Duquesne	559	1.04	342	0.63	565	1.04	639	1.17
Met-Ed	798	1.58	436	0.86	499	0.97	635	1.23
PECO+	1,753	1.16	894	0.59	1,147	0.75	1,613	1.05
Penelec	715	1.43	392	0.78	522	1.04	619	1.24
Penn Power	187	1.28	94	0.64	118	0.80	170	1.14
PPL	915	0.74	409	0.33	566	0.45	806	0.64
UGI-Electric	105	1.90	33	0.60	44	0.80	112	2.03
West Penn	958	1.53	492	0.78	567	0.90	752	1.19
<b>Total</b>	<b>5,990</b>		<b>3,092</b>		<b>4,028</b>		<b>5,346</b>	
<b>Average of Rates**</b>		<b>1.25</b>		<b>0.66</b>		<b>0.85</b>		<b>1.09</b>

\* The Consumer Complaint rate is the number of Consumer Complaints for each 1,000 residential customers.

\*\* Does not include UGI-Electric.

+ PECO statistics include electric and gas.

## 2019-22 Justified Residential Consumer Complaint Numbers/Rates Major Electric Distribution Companies

Utility	2019		2020		2021		2022	
	Number**	Rate***	Number**	Rate***	Number**	Rate***	Number**	Rate***
Duquesne	66	0.12	36	0.07	63*	0.12*	67*	0.12*
Met-Ed	54*	0.11*	28	0.06	53	0.10	58*	0.11*
PECO+	77*	0.05*	39*	0.03*	88*	0.06*	187*	0.12*
Penelec	43*	0.09*	31	0.06	49*	0.10*	55*	0.11*
Penn Power	11	0.08	6	0.04	6	0.04	11	0.07
PPL	74*	0.06*	30	0.02	37	0.03	48*	0.04*
UGI-Electric	15	0.27	2	0.04	7	0.13	5	0.09
West Penn	57*	0.09*	27	0.04	25*	0.04*	73*	0.12*
<b>Total</b>	<b>397</b>		<b>199</b>		<b>328</b>		<b>504</b>	
<b>Average of Rates****</b>		<b>0.08</b>		<b>0.05</b>		<b>0.07</b>		<b>0.10</b>

\* Based on a probability sample of complaints.

\*\* Estimated based on the number of Consumer Complaints in CSIS: 2020 as of June 4, 2021; 2021 as of Sept. 10, 2022; and 2022 as of May 5, 2023.

\*\*\* The justified Consumer Complaint rate is the estimated number of justified Consumer Complaints for each 1,000 residential customers based on a statistically valid sampling of complaints. The justified Consumer Complaint rate is a normalized ratio useful for comparing utility performance among the various companies. It is not a percentage.

\*\*\*\* Does not include UGI-Electric.

+ PECO statistics include electric and gas.

## 2019-22 Number/Percent of Justified Residential Consumer Complaints Major Electric Distribution Companies

Utility	2019		2020		2021		2022	
	Number**	Percent***	Number**	Percent***	Number**	Percent***	Number**	Percent***
Duquesne	66	11.8%	36	10.5%	63*	11.2%*	67*	10.5%*
Met-Ed	54*	6.8%*	28	6.4%	53	10.6%	58*	9.1%*
PECO+	77*	4.4%*	39*	4.4%*	88*	7.7%*	187*	11.6%*
Penelec	43*	6.0%*	31	7.9%	49*	9.4%*	55*	8.9%*
Penn Power	11	5.9%	6	6.4%	6	5.1%	11	6.5%
PPL	74*	8.1%*	30	7.3%	37	6.5%	48*	6.0%*
UGI-Electric	15	14.3%	2	6.1%	7	15.9%	5	4.5%
West Penn	57*	5.9%*	27	5.5%	25*	4.4%*	73*	9.7%*
<b>Total</b>	<b>397</b>		<b>199</b>		<b>328</b>		<b>504</b>	
<b>Average****</b>		<b>6.5%</b>		<b>6.4%</b>		<b>8.1%</b>		<b>9.5%</b>

\* Based on a probability sample of complaints.

\*\* Estimated based on the number of Consumer Complaints in CSIS: 2020 as of June 4, 2021; 2021 as of Sept. 10, 2022; and 2022 as of May 5, 2023.

\*\*\* The percent of justified Consumer Complaints is the estimated number of justified complaints divided by the total number of complaints received (multiplied by 100). The percent of justified Consumer Complaints represents a utility's individual performance.

\*\*\*\* Does not include UGI-Electric.

+ PECO statistics include electric and gas.

## Consumer Complaint Response Time

Response time is the number of days from the date BCS first contacts the utility regarding a complaint to the date the utility provides BCS with its initial informal complaint report. Response time quantifies the speed of a utility’s response to BCS Consumer Complaints. Average response time includes all residential EDC Consumer Complaints except complaints processed through CURE.

Duquesne, PECO and UGI-Electric had the shortest Consumer Complaint response times in 2022, while Penelec and PPL took the most time to respond.

### 2019-22 Average Response Time to BCS Residential Consumer Complaints Major Electric Distribution Companies

Utility	Number of Days			
	2019	2020	2021	2022
Duquesne	12.0	12.4	14.3	16.6
Met-Ed	15.8	11.8	15.4	18.6
PECO+	18.6	17.7	16.6	16.6
Penelec	16.6	12.1	14.3	19.0
Penn Power	16.2	12.4	14.7	18.8
PPL	18.9	17.3	19.0	24.6
UGI-Electric	14.3	9.0	8.2	12.1
West Penn	15.6	11.2	14.8	18.8
<b>Average*</b>	<b>16.6</b>	<b>13.8</b>	<b>15.7</b>	<b>18.4</b>

\* Does not include UGI-Electric

+ PECO statistics include electric and gas.

## Payment Arrangement Requests

During 2022, BCS handled 23,058 PARs from residential electric customers of the various EDCs (22,954) and EGSs (104). The seven major EDCs represented 97% (22,472) of the total PARs.

## PAR Rate, Justified PAR Rate, and Percent of Justified PARs

The following tables show the PAR Rate, the Justified PAR Rate, and the Percent of Justified PARs for each major EDC in 2019, 2020, 2021 and 2022. A complaint is considered “justified” if it is found that the utility did not comply with Commission Orders, policies, regulations, reports, Secretarial Letters, or tariffs. BCS evaluates a statistically valid sampling of complaints for each utility.

The PAR rate is the number of PARs for each 1,000 residential customers.

The justified PAR rate is the estimated number of justified PARs for each 1,000 residential customers based on a statistically valid sampling of complaints. It is not a percentage. The justified rate is a normalized ratio useful for comparing utility performance among the various companies.

From 2019 to 2022, the justified PAR rates for all of the EDCs decreased. The 2022 justified PAR rates for Penelec, Penn Power and UGI-Electric were greater than the 2022 industry average.

The percent of justified PARs is the estimated number of justified complaints divided by the total number of complaints received (multiplied by 100). The percent of justified PARs represents a utility’s individual performance.

### 2022 Residential Payment Arrangement Request (PAR) Rates, Justified PAR Rates, and Percent of Justified PARs Major Electric Distribution Companies

Utility	PAR Rate	Justified PAR Rate	Percent of Justified PARs
Duquesne	4.28	0.06*	1.4%*
Met-Ed	4.84	0.07*	1.5%*
PECO+	3.95	0.05*	1.2%*
Penelec	5.52	0.12*	2.2%*
Penn Power	5.85	0.14	2.4%
PPL	3.94	0.03*	0.9%*
UGI-Electric	8.62	0.40	4.6%
West Penn	4.72	0.05*	1.0%*
<b>Average**</b>	<b>4.73</b>	<b>0.08</b>	<b>1.3%</b>

+ PECO statistics include electric and gas.

\* Based on a probability sample of complaints.

\*\* Does not include UGI-Electric

**2019-22 Residential Payment Arrangement Request (PAR) Numbers/Rates  
Major Electric Distribution Companies**

Utility	2019		2020		2021		2022	
	Number	Rate*	Number	Rate*	Number	Rate*	Number	Rate*
Duquesne	1,755	3.26	169	0.31	1,523	2.80	2,334	4.28
Met-Ed	3,711	7.35	312	0.61	1,186	2.32	2,493	4.84
PECO+	6,696	4.45	610	0.40	2,126	1.39	6,072	3.95
Penelec	4,048	8.08	332	0.66	1,304	2.60	2,768	5.52
Penn Power	1,212	8.30	99	0.67	370	2.50	871	5.85
PPL	7,413	6.01	707	0.57	2,893	2.31	4,953	3.94
UGI-Electric	549	9.96	112	2.04	175	3.18	475	8.62
West Penn	4,286	6.83	289	0.46	1,382	2.19	2,981	4.72
<b>Total</b>	<b>29,670</b>		<b>2,630</b>		<b>10,959</b>		<b>22,947</b>	
<b>Average of Rates**</b>		<b>6.33</b>		<b>0.53</b>		<b>2.30</b>		<b>4.73</b>

\* The PAR rate is the number of PARs for each 1,000 residential customers.

\*\* Does not include UGI-Electric.

+ PECO statistics include electric and gas.

## 2019-22 Justified Residential Payment Arrangement Request (PAR) Numbers/Rates Major Electric Distribution Companies

Utility	2019		2020		2021		2022	
	Number**	Rate***	Number**	Rate***	Number**	Rate***	Number**	Rate***
Duquesne	208*	0.39*	7	0.01	328*	0.60*	33*	0.06*
Met-Ed	507*	1.00*	37	0.07	175*	0.34*	38*	0.07*
PECO+	1,142*	0.76*	24	0.02	338*	0.22*	75*	0.05*
Penelec	521*	1.04*	29	0.06	153*	0.30*	61*	0.12*
Penn Power	150*	1.03*	7	0.05	50	0.34	21	0.14
PPL	749*	0.61*	43	0.03	335*	0.27*	43*	0.03*
UGI-Electric	74	1.34	8	0.15	19	0.34	22	0.40
West Penn	523*	0.83*	42	0.07	163*	0.26*	31*	0.05*
<b>Average of Rates****</b>	<b>3,874</b>		<b>197</b>		<b>1,561</b>		<b>324</b>	
<b>Total</b>		<b>0.81</b>		<b>0.04</b>		<b>0.33</b>		<b>0.08</b>

\* Based on a probability sample of complaints.

\*\* Estimated based on the number of PAR complaints in CSIS: 2020 as of June 4, 2021; 2021 as of Sept. 10, 2022; and 2022 as of May 5, 2023.

\*\*\* The justified PAR rate is the estimated number of justified PARs for each 1,000 residential customers based on a statistically valid sampling of complaints. The justified PAR rate is a normalized ratio useful for comparing utility performance among the various companies. It is not a percentage

\*\*\*\* Does not include UGI-Electric.

+ PECO statistics include electric and gas.

**2019-22 Number/Percent of Justified Residential Payment Arrangement Requests (PARs)  
Major Electric Distribution Companies**

Utility	2019		2020		2021		2022	
	Number**	Percent***	Number**	Percent***	Number**	Percent***	Number**	Percent***
Duquesne	208*	11.9%*	7	4.1%	328*	21.5%*	33*	1.4%*
Met-Ed	507*	13.7%*	37	11.9%	175*	14.8%*	38*	1.5%*
PECO+	1,142*	17.1%*	24	3.9%	338*	15.9%*	75*	1.2%*
Penelec	521*	12.9%*	29	8.7%	153*	11.7%*	61*	2.2%*
Penn Power	150*	12.4%*	7	7.1%	50	13.5%	21	2.4%
PPL	749*	10.1%*	43	6.1%	335*	11.6%*	43*	0.9%*
UGI-Electric	74	13.5%	8	7.1%	19	10.9%	22	4.6%
West Penn	523*	12.2%*	42	14.5%	163*	11.8%*	31*	1.0%*
<b>Average****</b>	<b>3,874</b>		<b>197</b>		<b>1,561</b>		<b>324</b>	
<b>Total</b>		<b>13.0%</b>		<b>7.5%</b>		<b>14.3%</b>		<b>1.3%</b>

\* Based on a probability sample of complaints.

\*\* Estimated based on the number of PAR complaints in CSIS: 2020 as of June 4, 2021; 2021 as of Sept. 10, 2022; and 2022 as of May 5, 2023.

\*\*\* The percent of justified PARs is the estimated number of justified complaints divided by the total number of PARs received (multiplied by 100). The percent of justified PARs represents a utility's individual performance

\*\*\*\* Does not include UGI-Electric.

+ PECO statistics include electric and gas.



## PAR Response Time

Response time is the number of days from the date BCS first contacts the utility regarding a complaint to the date on which the utility provides BCS with its initial informal complaint report. Response time quantifies the speed of a utility’s response to BCS PAR complaints. The calculation for average response excludes undisputed PARs and CURE complaints.

There was a wide range of PAR response times among the major EDCs in 2022, from a low of 6.4 days for PECO to a high of 15.1 days for Penn Power.

### 2019-22 Average Response Time to BCS Residential Payment Arrangement Requests (PARs) Major Electric Distribution Companies

Utility	Number of Days			
	2019	2020	2021	2022
Duquesne	5.1	10.0	8.5	8.6
Met-Ed	11.7	8.4	7.3	12.3
PECO+	7.9	10.9	8.2	6.4
Penelec	11.6	7.3	7.9	13.7
Penn Power	12.8	6.8	9.0	15.1
PPL	6.4	7.0	5.6	11.6
UGI-Electric	8.8	6.2	2.8	8.2
West Penn	12.1	7.0	7.8	13.0
<b>Average*</b>	<b>7.0</b>	<b>6.0</b>	<b>7.2</b>	<b>8.0</b>

\* Does not include UGI-Electric.

+ PECO statistics include electric and gas.

## Termination and Reconnection of Service

Each month, the electric utilities report to the Commission the number of residential accounts that they terminated for non-payment during the previous month. They also report the number of previously terminated residential accounts that they reconnected during the month. Some EDCs maintain a fairly consistent pattern of termination behavior, while others fluctuate from year to year. The number of reconnections varies from year to year and from utility to utility, depending on a variety of factors. The EDC reconnects a customer’s terminated service when a customer either pays their debt in full or makes a significant payment on the debt and agrees to a payment arrangement for the balance owed to the utility or presents a medical certificate.

The following tables indicate the annual number of residential accounts each of the seven largest EDCs terminated and reconnected in 2019, 2020, 2021 and 2022. The first table also presents the termination rates for each of these utilities. The termination rate is the number of service terminations divided by the number of residential customers, expressed as a percent. Due to the Covid 19 pandemic, residential terminations were

suspended from March 13, 2020, to March 31, 2021. Utilities were encouraged to reconnect residential customers for health and safety reasons. This significantly impacted 2020 utility terminations and reconnections.

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

Utility	Residential Service Terminations				Termination Rates*			
	2019	2020**	2021	2022	2019	2020**	2021	2022
Duquesne	27,688	0	30,945	30,467	5.14	0.00	5.70	5.58
Met-Ed	26,076	754	26,941	28,816	5.17	0.15	5.26	5.59
PECO+	92,977	81	76,487	75,689	6.18	0.01	5.00	4.92
Penelec	21,065	760	20,354	20,488	4.21	0.15	4.06	4.09
Penn Power	4,293	150	2,416	3,244	2.94	0.10	1.63	2.18
PPL	53,340	1,502	30,843	35,241	4.32	0.12	2.47	2.81
UGI-Electric	913	36	1,493	1,607	1.66	0.07	2.71	2.92
West Penn	19,743	796	16,147	21,021	3.15	0.13	2.55	3.33
<b>Total</b>	<b>246,095</b>	<b>4,079</b>	<b>205,626</b>	<b>216,573</b>				
<b>Average***</b>					<b>4.85</b>	<b>0.08</b>	<b>3.99</b>	<b>4.18</b>

\* The termination rate is the number of service terminations divided by the number of residential customers, expressed as a percent.

\*\* Due to the Covid 19 pandemic, residential terminations were suspended from March 13, 2020, to March 31, 2021. This significantly impacted 2020 utility terminations and reconnections.

\*\*\* Does not include UGI-Electric

+ PECO statistics include electric and gas.

## Residential Service Reconnections Major Electric Distribution Companies

Utility	2019	2020*	2021	2022
Duquesne	21,468	0	24,848	23,976
Met-Ed	22,325	485	23,842	25,389
PECO+	78,866	1,181	66,909	62,113
Penelec	16,095	480	16,094	16,268
Penn Power	3,449	85	1,844	2,473
PPL	39,001	840	22,309	24,378
UGI-Electric	660	27	1,143	1,218
West Penn	15,308	536	12,882	17,148
<b>Total</b>	<b>197,172</b>	<b>3,634</b>	<b>169,871</b>	<b>172,963</b>

\* Due to the Covid 19 pandemic, residential terminations were suspended from March 13, 2020, to March 31, 2021. Utilities were encouraged to reconnect residential customers for health and safety reasons. This significantly impacted 2020 utility terminations and reconnections.

+ PECO statistics include electric and gas.

## Compliance

BCS provides utilities with written notice of alleged violations or infractions of the statutes and regulations found during BCS complaint handling. Utilities are provided opportunity to review and respond or appeal. The use of “infraction rate” is intended to help the Commission monitor and maintain customer services at the same level of quality for all distribution customers, regardless of who supplies their electricity under retail competition (66 Pa.C.S. § 2807(d)).

The infraction rates in the table that follows are based on informal complaints that residential consumers filed with BCS from 2019 through 2022. Infractions identified on complaints involving competition issues are included in the infraction statistics. The Infraction Category tables present detailed information about the infractions identified in 2022 complaints to the BCS.

The infraction rate is the number of informally verified infractions per 1,000 residential customers. Dividing per 1,000 customers normalizes the data for comparison purposes. The infraction rate is not a percentage. The categories with dispute-handling and credit standards and deposits are high percentage infraction areas. Appendix B-1 provides a list of the infractions included in each infraction category.

### Commission Infraction Rates\* Major Electric Distribution Companies

Utility	2019	2020	2021	2022
Duquesne	0.16	0.10	0.23	0.24
Met-Ed	0.13	0.05	0.18	0.14
PECO+	0.03	0.02	0.08	0.10
Penelec	0.11	0.06	0.13	0.18
Penn Power	0.15	0.05	0.18	0.17
PPL	0.06	0.03	0.04	0.04
UGI-Electric	0.51	0.05	0.27	0.31
West Penn	0.09	0.07	0.09	0.14

\* The infraction rate is the number of informally verified infractions per 1,000 residential customers. Dividing per 1,000 customers normalizes the data for comparison purposes. The infraction rate is not a percentage.

+ PECO statistics include electric and gas.

## 2022 Number and Percent of Major Electric Distribution Company Infractions\*

Category**	Duquesne	Met-Ed	PECO+	Penelec	Penn Power	PPL	UGI-Electric	West Penn	Electric Industry***
Billing and Payment	7	13	8	12	1	3	2	9	55
	5%	18%	5%	13%	4%	7%	12%	10%	9%
Meter Reading	0	0	8	1	1	0	0	1	11
	0%	0%	5%	1%	4%	0%	0%	1%	1%
Make-Up Bills	4	3	3	2	0	0	0	5	17
	3%	4%	2%	2%	0%	0%	0%	6%	2%
Transfer of Accounts	0	2	1	1	1	0	0	1	6
	0%	3%	1%	1%	4%	0%	0%	1%	1%
Credit Standards and Deposits	23	6	25	9	5	1	3	4	76
	18%	8%	16%	10%	19%	2%	18%	5%	12%
Termination Grounds	8	3	5	0	1	3	1	5	26
	6%	4%	3%	0%	4%	7%	6%	6%	5%
Termination Procedures	10	3	17	3	3	2	3	5	46
	8%	4%	11%	3%	12%	5%	18%	6%	8%
Reconnection of Service	19	3	13	9	4	4	0	7	59
	15%	4%	8%	10%	15%	9%	0%	8%	9%
Liability – Responsibility for Bills	0	0	2	1	1	0	0	0	4
	0%	0%	1%	1%	4%	0%	0%	0%	1%
Landlord/Ratepayer	0	0	2	2	0	0	0	0	4
	0%	0%	1%	2%	0%	0%	0%	0%	<1%
Dispute Handling	32	26	50	25	2	18	4	21	178
	25%	37%	32%	28%	8%	41%	24%	24%	27%
Other	26	12	20	25	7	13	4	30	137
	20%	17%	13%	28%	27%	30%	24%	34%	24%
<b>Total</b>	<b>129</b>	<b>71</b>	<b>154</b>	<b>90</b>	<b>26</b>	<b>44</b>	<b>17</b>	<b>88</b>	<b>619</b>

\* The number of verified infractions identified by BCS as of May 4, 2023.

\*\* Appendix B-1 provides a list of the infractions included in each infraction category.

\*\*\* Electric Average does not include UGI-Electric.

+ PECO statistics include electric and gas.

## 8. Natural Gas Industry

In 2022, the Commission had jurisdiction over 21 natural gas distribution companies (NGDCs). The majority of Consumer Complaints and PARs are about the five major NGDCs: Columbia Gas of Pennsylvania Inc. (**Columbia**), National Fuel Gas Distribution Corp. (**NFG**), Peoples Natural Gas Co. (**Peoples**), Philadelphia Gas Works (**PGW**), and UGI Gas f/k/a UGI South (**UGI Gas**). This chapter will focus exclusively on those five utilities.

On Oct 3, 2019, at Docket No. R-2018-3006818, et al., the Commission approved the merger of People Natural Gas' separate Peoples and Equitable rate districts into a single rate district known as Peoples Natural Gas LLC. Although this change took effect when Peoples Natural Gas LLC's amended tariff became effective on Oct. 29, 2019, the 2019 data was based on the separate rate districts. Effective Jan. 1, 2020, the Peoples data includes Peoples-Equitable.

On Oct. 4, 2019, at Docket No. R-2018-3006814, et al., the Commission approved the merger of the UGI Utilities, Inc. separate rate districts – UGI Central, UGI North and UGI South – into one rate district existing as UGI Utilities, Inc. – Gas Division. Although this change took effect when UGI's amended tariff became effective on Oct. 11, 2019, UGI Utilities' 2019 data was based on the separate rate districts. Effective Jan. 1, 2020, the UGI Gas data includes UGI Central f/k/a UGI Central Penn and UGI North f/k/a UGI Penn Natural Gas.

The statistics in the tables on the pages that follow depict the performance of each of the five major gas utilities in 2022. The major gas utilities are those that have more than 100,000 residential customers.

### Total Complaint Rate

The following table shows the Total Complaint Rate, which is the number of all complaints (FCRs and NFIs combined) for each 1,000 residential customers.

## 2019-22 Residential Total Complaint Numbers/Rates Major Natural Gas Distribution Companies

Utility	2019		2020		2021		2022	
	Number	Rate	Number	Rate	Number	Rate	Number	Rate
Columbia	852	2.13	257	0.63	639	1.57	1,004	2.45
NFG	895	4.55	150	0.76	355	1.79	522	2.65
Peoples+	1,584	4.72	477	0.81	1,344	2.27	1,634	2.75
Peoples-Equitale+	1,071	4.32	n/a	n/a	n/a	n/a	n/a	n/a
PGW	7,568	15.76	1,417	2.91	3,951	8.08	6,410	13.15
UGI Gas++	3,305	9.00	1,199	1.98	1,645	2.69	4,542	7.34
UGI North++	2,041	13.00	n/a	n/a	n/a	n/a	n/a	n/a
<b>Total</b>	<b>17,316</b>		<b>3,500</b>		<b>7,934</b>		<b>14,112</b>	
<b>Average of Rates</b>		<b>7.93</b>		<b>1.53</b>		<b>3.45</b>		<b>6.12</b>

+ Due to the Peoples Natural Gas merger, effective Jan. 1, 2020, the Peoples data includes Peoples-Equitale.

++ Due to the UGI Gas merger, effective Jan. 1, 2020, the UGI Gas data includes UGI Central and UGI North.

### Consumer Complaints

During 2022, BCS handled 2,423 Consumer Complaints from residential natural gas customers of the various NGDCs (2,164) and natural gas suppliers (NGSs) (259). The five major NGDCs represented 88% (2,126) of the total Consumer Complaints.

### Consumer Complaint Categories

The following table shows the number and percentage of 2022 complaints in each of the 14 categories used by BCS policy analysts for compliance evaluation. These categories are for all evaluated residential complaints filed with BCS.

Of the 1,254 Consumer Complaints evaluated, the top three categories of NGDC complaints account for almost half (45%) of the total: 23% billing disputes, 14% termination or PAR procedures, and 8% discontinuance/transfer. See Appendix D-1 for an explanation of complaint categories.

**Number and Percent of Consumer Complaints by Dispute Category**  
**2022 Complaints Evaluated\***  
**Major Natural Gas Distribution Companies**

Category**	Columbia	NFG	Peoples	PGW	UGI Gas	Gas Industry
Billing Disputes	34	12	52	112	77	<b>287</b>
	29%	23%	19%	26%	20%	<b>23%</b>
Termination or PAR Procedures	11	2	36	76	56	<b>181</b>
	9%	4%	13%	18%	15%	<b>14%</b>
Discontinuance/ Transfer	4	3	9	52	31	<b>99</b>
	3%	6%	3%	12%	8%	<b>8%</b>
Service Quality	12	9	42	7	22	<b>92</b>
	10%	17%	16%	2%	6%	<b>7%</b>
Personnel Problems	7	3	24	36	18	<b>88</b>
	6%	6%	9%	8%	5%	<b>7%</b>
Damages	7	5	31	17	24	<b>84</b>
	6%	10%	11%	4%	6%	<b>7%</b>
Other Payment Issues	7	3	20	27	24	<b>81</b>
	6%	6%	7%	6%	6%	<b>6%</b>
Credit and Deposits	3	0	7	29	39	<b>78</b>
	3%	0%	3%	7%	10%	<b>6%</b>
Metering	4	5	5	15	11	<b>40</b>
	3%	10%	2%	3%	3%	<b>3%</b>
Scheduling Delays	3	2	13	6	11	<b>35</b>
	3%	4%	5%	1%	3%	<b>3%</b>
Service Extensions	4	0	4	0	4	<b>12</b>
	3%	0%	1%	0%	1%	<b>1%</b>
Rates	4	0	0	3	2	<b>9</b>
	3%	0%	0%	1%	1%	<b>1%</b>
Service Interruptions	2	0	4	0	2	<b>8</b>
	2%	0%	1%	0%	1%	<b>1%</b>
All Other Problems	14	8	24	54	60	<b>160</b>
	12%	15%	9%	12%	16%	<b>13%</b>
<b>Total*</b>	<b>116</b>	<b>52</b>	<b>271</b>	<b>434</b>	<b>381</b>	<b>1,254</b>

\* Based on residential complaints opened in 2022 and evaluated by BCS as of May 5, 2023.

\*\* Categories are for all evaluated residential complaints filed with BCS. See Appendix D-1 for an explanation of complaint categories.



## Consumer Complaint Rate, Justified Consumer Complaint Rate, and Percent of Justified Consumer Complaints

The following tables show the Consumer Complaint Rate, the Justified Consumer Complaint Rate, and the Percent of Justified Consumer Complaints for each major NGDC in 2019, 2020, 2021 and 2022. A complaint is considered “justified” if it is found that the utility did not comply with Commission Orders, policies, regulations, reports, Secretarial Letters, or tariffs. BCS evaluates a statistically valid sampling of complaints for each utility.

The Consumer Complaint rate is the number of Consumer Complaints for each 1,000 residential customers.

The justified Consumer Complaint rate is the estimated number of justified Consumer Complaints for each 1,000 residential customers based on a statistically valid sampling of complaints. The justified Consumer Complaint rate is a normalized ratio useful for comparing utility performance among the various utility companies. It is not a percentage.

From 2019 to 2022, the justified Consumer Complaint rates for Peoples and PGW increased, while the rates for Columbia, NFG and UGI Gas decreased. The 2022 justified Consumer Complaint rate for PGW was greater than the 2022 industry average.

The percent of justified Consumer Complaints is the estimated number of justified complaints divided by the total number of complaints received (multiplied by 100). The percent of justified Consumer Complaints represents a utility’s individual performance.

### 2022 Residential Consumer Complaint Rates, Justified Consumer Complaint Rates, and Percent of Justified Consumer Complaints Major Natural Gas Distribution Companies

Utility	Consumer Complaint Rate	Justified Consumer Complaint Rate	Percent of Justified Consumer Complaints
Columbia	0.41	0.00	0.6%
NFG	0.34	0.04	12.1%
Peoples	0.58	0.02	3.8%
PGW	2.25	0.47*	20.7%*
UGI Gas	0.73	0.07	9.3%
<b>Average</b>	<b>0.86</b>	<b>0.12</b>	<b>13.7%</b>

\* Based on a probability sample of complaints.

**2019-22 Residential Consumer Complaint Numbers/Rates  
Major Natural Gas Distribution Companies**

Utility	2019		2020		2021		2022	
	Number	Rate*	Number	Rate*	Number	Rate*	Number	Rate*
Columbia	137	0.34	76	0.19	122	0.30	168	0.41
NFG	96	0.49	51	0.26	74	0.37	66	0.34
Peoples+	227	0.68	239	0.40	374	0.63	344	0.58
Peoples-Equitable+	163	0.66	n/a	n/a	n/a	n/a	n/a	n/a
PGW	920	1.92	501	1.03	628	1.28	1,095	2.25
UGI Gas++	296	0.81	222	0.37	296	0.48	453	0.73
UGI North++	235	1.50	n/a	n/a	n/a	n/a	n/a	n/a
<b>Total</b>	<b>2,074</b>		<b>1,089</b>		<b>1,494</b>		<b>2,126</b>	
<b>Average of Rates</b>		<b>0.91</b>		<b>0.45</b>		<b>0.61</b>		<b>0.86</b>

\* The Consumer Complaint rate is the number of Consumer Complaints for each 1,000 residential customers.  
+ Due to the Peoples Natural Gas merger, effective Jan. 1, 2020, the Peoples data includes Peoples-Equitable.  
++ Due to the UGI Gas merger, effective Jan. 1, 2020, the 2020 UGI Gas data includes UGI Central and UGI North.

**2019-22 Justified Residential Consumer Complaint Numbers/Rates  
Major Natural Gas Distribution Companies**

Utility	2019		2020		2021		2022	
	Number**	Rate***	Number**	Rate***	Number**	Rate***	Number**	Rate***
Columbia	4	0.01	3	0.01	7	0.02	1	0.00
NFG	10	0.05	6	0.03	5	0.03	8	0.04
Peoples+	3	0.01	5	0.01	12	0.02	13	0.02
Peoples-Equitable+	9	0.04	n/a	n/a	n/a	n/a	n/a	n/a
PGW	77*	0.16*	70	0.14	150*	0.31*	227*	0.47*
UGI Gas++	33	0.09	18	0.03	40	0.07	42	0.07
UGI North++	25	0.16	n/a	n/a	n/a	n/a	n/a	n/a
<b>Total</b>	<b>161</b>		<b>102</b>		<b>214</b>		<b>291</b>	
<b>Average of Rates</b>		<b>0.07</b>		<b>0.04</b>		<b>0.09</b>		<b>0.12</b>

\* Based on a probability sample of complaints.  
\*\* Estimated based on the number of Consumer Complaints in CSIS: 2020 as of June 4, 2021; 2021 as of Sept. 10, 2022; and 2022 as of May 5, 2023.  
\*\*\* The justified Consumer Complaint rate is the estimated number of justified Consumer Complaints for each 1,000 residential customers based on a statistically valid sampling of complaints. The justified Consumer Complaint rate is a normalized ratio useful for comparing utility performance among the various companies. It is not a percentage.  
+ Due to the Peoples Natural Gas merger, effective Jan. 1, 2020, the 2020 Peoples data includes Peoples-Equitable.  
++ Due to the UGI Gas merger, effective Jan. 1, 2020, the 2020 UGI Gas data includes UGI Central and UGI North.

## 2019-22 Number/Percent of Justified Residential Consumer Complaints Major Natural Gas Distribution Companies

Utility	2019		2020		2021		2022	
	Number**	Percent***	Number**	Percent***	Number**	Percent***	Number**	Percent***
Columbia	4	2.9%	3	3.9%	7	5.7%	1	0.6%
NFG	10	10.4%	6	11.8%	5	6.8%	8	12.1%
Peoples+	3	1.3%	5	2.1%	12	3.2%	13	3.8%
Peoples-Equitable+	9	5.5%	n/a	n/a	n/a	n/a	n/a	n/a
PGW	77*	8.4%*	70	14.0%	150*	23.9%*	227*	20.7%*
UGI Gas++	33	11.1%	18	8.1%	40	13.5%	42	9.3%
UGI North++	25	10.6%	n/a	n/a	n/a	n/a	n/a	n/a
<b>Total</b>	<b>161</b>		<b>102</b>		<b>214</b>		<b>291</b>	
<b>Average</b>		<b>7.8%</b>		<b>9.4%</b>		<b>14.3%</b>		<b>13.7%</b>

\* Based on a probability sample of complaints.

\*\* Estimated based on the number of Consumer Complaints in CSIS: 2020 as of June 4, 2021; 2021 as of Sept. 10, 2022; and 2022 as of May 5, 2023.

\*\*\* The percent of justified Consumer Complaints is the estimated number of justified complaints divided by the total number of complaints received (multiplied by 100). The percent of justified Consumer Complaints represents a utility's individual performance.

+ Due to the Peoples Natural Gas merger, effective Jan. 1, 2020, the Peoples data includes Peoples-Equitable.

++ Due to the UGI Gas merger, effective Jan. 1, 2020, the UGI Gas data includes UGI Central and UGI North.

## Consumer Complaint Response Time

Response time is the number of days from the date BCS first contacts the utility regarding a complaint to the date the utility provides BCS with its initial informal complaint report. Response time quantifies the speed of a utility’s response to BCS Consumer Complaints. Average response time includes all residential NGDC Consumer Complaints except complaints processed through CURE.

Peoples had the shortest Consumer Complaint response times in 2022, while PGW took the most time to respond.

### 2019-22 Average Response Time to BCS Residential Consumer Complaints Major Natural Gas Distribution Companies

Utility	Number of Days			
	2019	2020	2021	2022
Columbia	6.9	9.6	10.3	8.2
NFG	12.9	11.2	13.6	16.9
Peoples+	3.6	3.4	4.8	4.6
Peoples-Equitable+	3.8	n/a	n/a	n/a
PGW	14.8	10.5	21.2	19.8
UGI Gas++	11.3	8.8	7.6	10.7
UGI North++	11.9	n/a	n/a	n/a
<b>Average</b>	<b>11.2</b>	<b>8.4</b>	<b>13.0</b>	<b>14.2</b>

+ Due to the Peoples Natural Gas merger, effective Jan. 1, 2020, the Peoples data includes Peoples-Equitable.

++ Due to the UGI Gas merger, effective Jan. 1, 2020, the UGI Gas data includes UGI Central and UGI North.

## Payment Arrangement Requests

During 2022, BCS handled 9,408 PARs from residential natural gas customers of the various NGDCs (9,397) and NGSs (11). The five major NGDCs represented 99% (9,320) of the total PARs.

## PAR Rate, Justified PAR Rate, and Percent of Justified PARs

The following tables show the PAR Rate, the Justified PAR Rate, and the Percent of Justified PARs for each major NGDC in 2019, 2020, 2021 and 2022. A complaint is considered “justified” if it is found that the utility did not comply with Commission Orders, policies, regulations, reports, Secretarial Letters, or tariffs. BCS evaluates a statistically valid sampling of complaints for each utility.

The PAR rate is the number of PARs for each 1,000 residential customers.

The justified PAR rate is the estimated number of justified PARs for each 1,000 residential customers based on a statistically valid sampling of complaints. It is not a percentage. The justified rate is a normalized ratio useful for comparing utility performance among the various companies.

From 2019 to 2022, the justified PAR rates for Columbia and PGW increased, while the rates decreased for NFG, Peoples and UGI Gas. The 2022 justified PAR rates for PGW was greater than the 2022 industry average.

The percent of justified PARs is the estimated number of justified complaints divided by the total number of complaints received (multiplied by 100). The percent of justified PARs represents a utility’s individual performance.

### 2022 Residential Payment Arrangement Request (PAR) Rates, Justified PAR Rates, and Percent of Justified PARs Major Natural Gas Distribution Companies

Utility	PAR Rate	Justified PAR Rate	Percent of Justified PARs
Columbia	1.35	0.04	3.1%
NFG	1.79	0.07	3.7%
Peoples	1.71	0.03*	1.5%*
PGW	8.21	1.43*	17.5%*
UGI Gas	5.49	0.14*	2.5%*
<b>Average</b>	<b>3.71</b>	<b>0.34</b>	<b>8.9%</b>

\* Based on a probability sample of complaints

## 2019-22 Residential Payment Arrangement Request (PAR) Numbers/Rates Major Natural Gas Distribution Companies

Utility	2019		2020		2021		2022	
	Number	Rate*	Number	Rate*	Number	Rate*	Number	Rate*
Columbia	469	1.17	62	0.15	338	0.83	552	1.35
NFG	610	3.10	56	0.28	219	1.11	353	1.79
Peoples+	870	2.59	114	0.19	769	1.30	1,018	1.71
Peoples-Equitale+	685	2.76	n/a	n/a	n/a	n/a	n/a	n/a
PGW	4,739	9.87	526	1.08	2,676	5.47	4,001	8.21
UGI Gas++	2,330	6.35	628	1.04	1,033	1.69	3,396	5.49
UGI North++	1,505	9.58	n/a	n/a	n/a	n/a	n/a	n/a
<b>Total</b>	<b>11,208</b>		<b>1,386</b>		<b>5,035</b>		<b>9,320</b>	
<b>Average of Rates</b>		<b>5.06</b>		<b>0.55</b>		<b>2.08</b>		<b>3.71</b>

\* The PAR rate is the number of PARs for each 1,000 residential customers

+ Due to the Peoples Natural Gas merger, effective Jan. 1, 2020, the Peoples data includes Peoples-Equitale.

++ Due to the UGI Gas merger, effective Jan. 1, 2020, the UGI Gas data includes UGI Central and UGI North.

## 2019-22 Justified Residential Payment Arrangement Request (PAR) Numbers/Rates Major Natural Gas Distribution Companies

Utility	2019		2020		2021		2022	
	Number**	Rate***	Number**	Rate***	Number**	Rate***	Number**	Rate***
Columbia	12	0.03	0	0.00	13	0.03	17	0.04
NFG	48	0.24	3	0.02	43	0.22	13	0.07
Peoples+	63*	0.19*	16	0.03	50*	0.08*	15*	0.03*
Peoples-Equitale+	49	0.20	n/a	n/a	n/a	n/a	n/a	n/a
PGW	508*	1.06*	41	0.08	270*	0.55*	699*	1.43*
UGI Gas++	274*	0.75*	65	0.11	68*	0.11*	86*	0.14*
UGI North++	161*	1.03*	n/a	n/a	n/a	n/a	n/a	n/a
<b>Total</b>	<b>1,115</b>		<b>125</b>		<b>444</b>		<b>830</b>	
<b>Average of Rates</b>		<b>0.50</b>		<b>0.05</b>		<b>0.20</b>		<b>0.34</b>

\* Based on a probability sample of complaints.

\*\* Estimated based on the number of PAR complaints in CSIS: 2020 as of June 4, 2021; 2021 as of Sept. 10, 2022; and 2022 as of May 5, 2023.

\*\*\* The justified PAR rate is the estimated number of justified PARs for each 1,000 residential customers based on a statistically valid sampling of complaints. The justified PAR rate is a normalized ratio useful for comparing utility performance among the various companies. It is not a percentage.

+ Due to the Peoples Natural Gas merger, effective Jan. 1, 2020, the Peoples data includes Peoples-Equitale.

++ Due to the UGI Gas merger, effective Jan. 1, 2020, the UGI Gas data includes UGI Central and UGI North.

**2019-22 Number/Percent of Justified Residential Payment Arrangement Requests (PARs)  
Major Natural Gas Distribution Companies**

Utility	2019		2020		2021		2022	
	Number**	Percent***	Number**	Percent***	Number**	Percent***	Number**	Percent***
Columbia	12	2.6%	0	0.0%	13	3.8%	17	3.1%
NFG	48	7.9%	3	5.4%	43	19.6%	13	3.7%
Peoples+	63*	7.2%	16	14.0%	50*	6.5%	15*	1.5%*
Peoples-Equitable+	49	7.2%	n/a	n/a	n/a	n/a	n/a	n/a
PGW	508*	10.7%	41	7.8%	270*	10.1%	699*	17.5%*
UGI Gas++	274*	11.8%	65	10.4%	68*	6.6%	86*	2.5%*
UGI North++	161*	10.7%	n/a	n/a	n/a	n/a	n/a	n/a
<b>Total</b>	<b>1,115</b>		<b>125</b>		<b>444</b>		<b>830</b>	
<b>Average</b>		<b>9.9%</b>		<b>9.0%</b>		<b>8.8%</b>		<b>8.9%</b>

\* Based on a probability sample of complaints.

\*\* Estimated based on the number of PAR complaints in CSIS: 2020 as of June 4, 2021 and 2021 as of Sept. 10, 2022; and 2022 as of May 5, 2023

\*\*\* The percent of justified PARs is the estimated number of justified complaints divided by the total number of PARs received (multiplied by 100). The percent of justified PARs represents a utility's individual performance.

+ Due to the Peoples Natural Gas merger, effective Jan. 1, 2020, the Peoples data includes Peoples-Equitable.

++ Due to the UGI Gas merger, effective Jan. 1, 2020, the UGI Gas data includes UGI Central and UGI North.

## PAR Response Time

Response time is the number of days from the date BCS first contacts the utility regarding a complaint to the date on which the utility provides BCS with its initial informal complaint report. Response time quantifies the speed of a utility’s response to BCS PAR complaints. The calculation for average response excludes undisputed PARs and CURE complaints.

There was a wide range of PAR response times among the major EDCs in 2022, from a low of 2.4 days for Peoples to a high of 14.4 days for PGW.

### 2019-22 Average Response Time to BCS Residential Payment Arrangement Requests (PARs) Major Natural Gas Distribution Companies

Utility	Number of Days			
	2019	2020	2021	2022
Columbia	2.4	4.2	6.3	3.0
NFG	6.3	6.0	6.7	7.6
Peoples+	2.3	2.2	2.4	2.4
Peoples-Equitable+	2.1	n/a	n/a	n/a
PGW	7.6	4.6	15.5	14.4
UGI Gas++	6.2	5.6	2.5	5.6
UGI North++	6.3	n/a	n/a	n/a
<b>Average</b>	<b>4.3</b>	<b>3.2</b>	<b>10.4</b>	<b>7.7</b>

+ Due to the Peoples Natural Gas merger, effective Jan. 1, 2020, the Peoples data includes Peoples-Equitable.

++ Due to the UGI Gas merger, effective Jan. 1, 2020, the UGI Gas data includes UGI Central and UGI North.

## Termination and Reconnection of Service

Each month, the electric utilities report to the Commission the number of residential accounts that they terminated for non-payment during the previous month. They also report the number of previously terminated residential accounts that they reconnected during the month. Some NGDCs maintain a fairly consistent pattern of termination behavior, while others fluctuate from year to year. The number of reconnections varies from year to year and from utility to utility, depending on a variety of factors. The NGDC reconnects a customer’s terminated service when a customer either pays their debt in full or makes a significant payment on the debt and agrees to a payment arrangement for the balance owed to the utility or presents a medical certificate.

The following tables indicate the annual number of residential accounts each of the five largest NGDCs terminated and reconnected in 2019, 2020, 2021 and 2022. The first table also presents the termination rates for each of these utilities. The termination rate is the number of service terminations divided by the number of residential customers, expressed as a percent. Due to the Covid 19 pandemic, residential terminations were suspended from March 13, 2020, to March 31, 2021. Utilities were encouraged to reconnect residential



customers for health and safety reasons. This significantly impacted 2020 utility terminations and reconnections.

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

Utility	Residential Service Terminations				Termination Rates*			
	2019	2020**	2021	2022	2019	2020**	2021	2022
Columbia	10,770	12	9,760	11,380	2.69	0.00	2.39	2.78
NFG	7,533	0	7,091	6,861	3.83	0.00	3.58	3.49
Peoples+	11,255	823	23,754	15,335	3.35	0.14	4.01	2.58
Peoples-Equitable+	9,444	n/a	n/a	n/a	3.81	n/a	n/a	n/a
PGW	29,048	0	15,669	14,410	6.05	0.00	3.21	2.96
UGI Gas++	10,657	356	23,013	26,882	2.90	0.06	3.76	4.35
UGI North++	6,652	n/a	n/a	n/a	4.24	n/a	n/a	n/a
<b>Total</b>	<b>85,359</b>	<b>1,191</b>	<b>79,287</b>	<b>74,868</b>				
<b>Average</b>					<b>3.91</b>	<b>0.05</b>	<b>3.45</b>	<b>3.25</b>

\* The termination rate is the number of service terminations divided by the number of residential customers, expressed as a percent.

\*\* Due to the Covid 19 pandemic, residential terminations were suspended from March 13, 2020, to March 31, 2021. This significantly impacted 2020 utility terminations and reconnections.

+ Due to the Peoples Natural Gas merger, effective Jan. 1, 2020, the Peoples data includes Peoples-Equitable.

++ Due to the UGI Gas merger, effective Jan. 1, 2020, the UGI Gas data includes UGI Central and UGI North.

### Residential Service Reconnections Major Natural Gas Distribution Companies

Utility	2019	2020*	2021	2022
Columbia	6,153	235	5,503	6,760
NFG	4,926	167	5,095	5,003
Peoples+	7,648	988	18,349	11,840
Peoples-Equitable+	6,598	n/a	n/a	n/a
PGW	20,986	1,256	10,567	9,716
UGI Gas++	7,825	579	17,239	19,924
UGI North++	4,839	n/a	n/a	n/a
<b>Total</b>	<b>58,975</b>	<b>3,225</b>	<b>56,753</b>	<b>53,243</b>

\* Due to the Covid 19 pandemic, residential terminations were suspended from March 13, 2020, to March 31, 2021. Utilities were encouraged to reconnect residential customers for health and safety reasons. This significantly impacted 2020 utility terminations and reconnections.

+ Due to the Peoples Natural Gas merger, effective Jan. 1, 2020, the Peoples data includes Peoples-Equitable.

++ Due to the UGI Gas merger, effective Jan. 1, 2020, the UGI Gas data includes UGI Central and UGI North.

## Compliance

BCS provides utilities with written notice of alleged violations or infractions of the statutes and regulations found during BCS complaint handling. Utilities are provided the opportunity to review and respond or appeal. The use of “infraction rate” is intended to help the Commission monitor and maintain customer services at the same level of quality for all distribution customers, regardless of who supplies their natural gas under retail competition (66 Pa.C.S. § 2206(a)).

The infraction rates in the table that follows are based on the review of informal complaints that residential consumers filed with BCS from 2019 through 2022. Infractions identified on complaints involving competition issues are included in the infraction statistics. The Infraction Category tables present detailed information about the infractions identified in complaints to the BCS.

The infraction rate is the number of informally verified infractions per 1,000 residential customers. Dividing per 1,000 customers normalizes the data for comparison purposes. The infraction rate is not a percentage. The credit standards and deposits category is a high percentage infraction area. Appendix B-1 provides a list of the infractions included in each infraction category.

### Commission Infraction Rates\* Major Natural Gas Distribution Companies

Utility	2019	2020	2021	2022
Columbia	0.00	0.00	0.03	0.02
NFG	0.07	0.06	0.16	0.10
Peoples+	0.01	0.01	0.06	0.02
Peoples-Equitable+	0.03	n/a	n/a	n/a
PGW	0.18	0.28	0.47	0.83
UGI Gas++	0.14	0.04	0.13	0.18
UGI North++	0.25	n/a	n/a	n/a

\* The infraction rate is the number of informally verified infractions per 1,000 residential customers. Dividing per 1,000 customers normalizes the data for comparison purposes. The infraction rate is not a percentage.

+ Due to the Peoples Natural Gas merger, effective Jan. 1, 2020, the Peoples data includes Peoples-Equitable.

++ Due to the UGI Gas merger, effective Jan. 1, 2020, the UGI Gas data includes UGI Central and UGI North.

## 2022 Number and Percent of Major Natural Gas Distribution Company Infractions\*

Category**	Columbia	NFG	Peoples	PGW	UGI Gas	Gas Industry
Billing and Payment	0	0	2	29	3	<b>34</b>
	0%	0%	15%	7%	3%	<b>5%</b>
Meter Reading	0	2	0	10	6	<b>18</b>
	0%	10%	0%	2%	6%	<b>4%</b>
Make-Up Bills	1	1	0	10	1	<b>13</b>
	10%	5%	0%	2%	1%	<b>4%</b>
Transfer of Accounts	0	1	0	6	0	<b>7</b>
	0%	5%	0%	1%	0%	<b>1%</b>
Credit Standards and Deposits	3	3	3	88	23	<b>120</b>
	30%	15%	23%	22%	21%	<b>22%</b>
Termination Grounds	3	1	1	10	15	<b>30</b>
	30%	5%	8%	2%	14%	<b>12%</b>
Termination Procedures	0	1	0	42	16	<b>59</b>
	0%	5%	0%	10%	15%	<b>6%</b>
Reconnection of Service	1	2	2	30	16	<b>51</b>
	10%	10%	15%	7%	15%	<b>11%</b>
Liability – Responsibility for Bills	0	0	0	18	0	<b>18</b>
	0%	0%	0%	4%	0%	<b>1%</b>
Landlord/Ratepayer	0	0	0	4	0	<b>4</b>
	0%	0%	0%	1%	0%	<b>&lt;1%</b>
Dispute Handling	0	7	1	97	14	<b>119</b>
	0%	35%	8%	24%	13%	<b>16%</b>
Other	2	2	4	61	15	<b>84</b>
	20%	10%	31%	15%	14%	<b>18%</b>
<b>Total*</b>	<b>10</b>	<b>20</b>	<b>13</b>	<b>405</b>	<b>109</b>	<b>557</b>

\* The number of verified infractions identified by BCS as of May 4, 2023.

\*\* Appendix B-1 provides a list of the infractions included in each infraction category.

## 9. Water Industry

In 2022, 74 water utilities were regulated by the PUC. Tables in this chapter present Consumer Complaint and PAR information. The water utilities are categorized into three groupings based on the amount of the utility's annual revenue, including Class A water utilities, Class B water utilities, and Class C water utilities. Some municipal water utilities are subject to PUC regulation because they operate beyond their municipal boundary; however, the data for municipal water utilities is not included in this report.

Class A water utilities generate annual revenues of \$1 million or more for three consecutive years. In 2022, nine Class A water utilities served residential customers including:

- Aqua Pennsylvania Inc. (**Aqua**)
- Audubon Water Co. (**Audubon**)
- Columbia Water Co. (**Columbia**)
- Community Utilities of PA (**Community Utilities**)
- Newtown Artesian Water Co. (**Newtown Artesian**)
- Pennsylvania American Water Co. (**PAWC**)
- Veolia Water Bethel f/k/a SUEZ Water Bethel (**Veolia Bethel**)
- Veolia Water PA f/k/a SUEZ Water PA (**Veolia PA**)
- York Water Co. (**York**)

The number of residential customers served by these utilities in 2022 ranged from 2,452 residential customers for Veolia Water Bethel to 642,776 residential customers for PAWC.

Data for the Class A water utilities in this chapter are presented two ways; PAWC and Aqua are presented individually by utility and the rest are combined under the category of "Other Class A" utilities. Data representing Class A industry averages includes combined data for all Class A water utilities (both the individual data for PAWC and Aqua, as well as the combined data from the "Other Class A" utilities).

Compared to Class A water utilities, Class B and Class C utilities have lower annual revenues and typically fewer residential customers.

In 2022, seven Class B utilities were operating in Pennsylvania. These utilities had annual revenues between \$200,000 and \$999,999 and served 303 to 1,353 residential customers.

In 2022, there were 36 Class C utilities. The annual revenue for these utilities was less than \$200,000 and they served customers ranging from one to 550.

The Commission has limited jurisdiction over municipally owned water and sewer utilities. The Commission's jurisdiction is limited to regulating the rates and service of customers that are outside the boundaries of the municipalities.

Chapter 32, Water and Sewer Authorities in Cities of the Second Class was added to Title 66 of the Public Utility Code on Dec. 21, 2017. The addition of Chapter 32 resulted in full PUC regulation of the Pittsburgh Water & Sewer Authority (PWSA), effective April 1, 2018. Although PWSA is a municipal water and sewer authority, 66 Pa.C.S.A. § 3202 provides that Commission laws, regulations, orders, etc. apply to PWSA in the same manner as a public utility. A Municipal Water and Sewer section distinguishes PWSA from the major public water utilities as PWSA works to implement policies and procedures that will fulfill the requirements of

PUC laws, regulations, and policies. PWSA is addressed later in this chapter in the Municipal Water, Sewer and Stormwater section.

Most residential Consumer Complaints and PARs to BCS concern the Class A water utilities. The tables on the pages that follow are specific to the Class A water utilities in 2022.

## Total Complaint Rate

The following table shows the Total Complaint Rate, which is the number of all complaints (FCRs and NFIs combined) for each 1,000 residential customers.

### 2019-22 Residential Total Complaint Numbers/Rates Major Class A Water Utilities

Utility	2019		2020		2021		2022	
	Number	Rate	Number	Rate	Number	Rate	Number	Rate
Aqua	985	2.44	399	0.98	823	2.01	945	2.29
PAWC	4,116	6.71	1,435	2.28	2,459	3.89	2,711	4.22
<b>Large Class A Total</b>	<b>5,101</b>		<b>1,834</b>		<b>3,282</b>		<b>3,656</b>	
<b>Large Class A Average of Rates</b>		<b>5.01</b>		<b>1.77</b>		<b>3.15</b>		<b>3.46</b>
Audubon	3	1.11	11	4.18	7	2.61	6	2.23
Columbia	35	3.60	10	1.02	7	0.71	12	1.10
Community Utilities	10	3.80	35	13.26	21	7.93	22	8.30
Newtown Artesian	1	0.10	0	0.00	3	0.31	4	0.41
Veolia Bethel	0	0.00	1	0.41	0	0.00	1	0.41
Veolia PA	103	1.83	59	1.03	88	1.51	76	1.29
York	119	1.92	45	0.72	44	0.69	106	1.58
<b>“Other Class A” Total</b>	<b>271</b>		<b>161</b>		<b>170</b>		<b>227</b>	
<b>“Other Class A” Average of Rates*</b>		<b>1.86</b>		<b>1.10</b>		<b>1.14</b>		<b>1.47</b>
<b>All Class A Total</b>	<b>5,372</b>		<b>1,995</b>		<b>3,452</b>		<b>3,883</b>	
<b>All Class A Average of Rates**</b>		<b>4.62</b>		<b>1.69</b>		<b>2.90</b>		<b>3.21</b>

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

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

## Consumer Complaints

During 2022, BCS handled a total of 1,234 Consumer Complaints from residential customers of the various water utilities. The major Class A water utilities represented 85% (1,047) of the total Consumer Complaints.

While a majority of Consumer Complaints involved the Class A water utilities in 2022, the Commission devoted a significant amount of attention to the smaller water utilities to help educate them about customer service and billing compliance concerns.

During 2022, BCS handled 13 complaints for small water utilities, with 38% (5 complaints) involving billing disputes.

## Consumer Complaint Categories

The following table shows the number and percentage of 2022 complaints in each of the 14 categories used by BCS policy analysts for compliance evaluation. These categories are for all evaluated residential complaints filed with BCS.

Of the 725 Consumer Complaints evaluated in 2022 for the Class A water utilities, approximately 35% concerned billing disputes. See Appendix D-1 for an explanation of complaint categories.

**Number and Percent of Consumer Complaints by Dispute Category**  
**2022 Complaints Evaluated\***  
**Major Class A Water Utilities**

Category**	Aqua	PAWC	Large Class A Avg	Audubon	Columbia	Community Utilities	Newtown Artesian	Veolia Bethel	Veolia PA	York	"Other Class A" Avg***	All Class A Water****
Billing Disputes	93	148	<b>241</b>	1	0	3	2	0	2	6	<b>14</b>	<b>255</b>
	40%	34%	<b>36%</b>	33%	0%	30%	100%	0%	10%	29%	<b>23%</b>	<b>35%</b>
Termination or PAR Procedures	38	72	<b>110</b>	0	1	0	0	0	1	1	<b>3</b>	<b>113</b>
	16%	17%	<b>17%</b>	0%	20%	0%	0%	0%	5%	5%	<b>5%</b>	<b>16%</b>
Metering	21	55	<b>76</b>	0	0	0	0	0	10	1	<b>11</b>	<b>87</b>
	9%	13%	<b>11%</b>	0%	0%	0%	0%	0%	50%	5%	<b>18%</b>	<b>12%</b>
Service Quality	14	38	<b>52</b>	2	0	4	0	0	2	4	<b>12</b>	<b>64</b>
	6%	9%	<b>8%</b>	67%	0%	40%	0%	0%	10%	19%	<b>19%</b>	<b>9%</b>
Rates	28	7	<b>35</b>	0	1	2	0	0	0	0	<b>3</b>	<b>38</b>
	12%	2%	<b>5%</b>	0%	20%	20%	0%	0%	0%	0%	<b>5%</b>	<b>5%</b>
Credit and Deposits	11	17	<b>28</b>	0	1	0	0	0	0	0	<b>1</b>	<b>29</b>
	5%	4%	<b>4%</b>	0%	20%	0%	0%	0%	0%	0%	<b>2%</b>	<b>4%</b>
Damages	5	21	<b>26</b>	0	0	0	0	0	1	0	<b>1</b>	<b>27</b>
	2%	5%	<b>4%</b>	0%	0%	0%	0%	0%	5%	0%	<b>2%</b>	<b>4%</b>
Discontinuance/Transfer	3	16	<b>19</b>	0	1	0	0	0	2	0	<b>3</b>	<b>22</b>
	1%	4%	<b>3%</b>	0%	20%	0%	0%	0%	10%	0%	<b>5%</b>	<b>3%</b>
Personnel Problems	2	16	<b>18</b>	0	0	1	0	0	0	1	<b>2</b>	<b>20</b>
	1%	4%	<b>3%</b>	0%	0%	10%	0%	0%	0%	5%	<b>3%</b>	<b>3%</b>
Other Payment Issues	10	7	<b>17</b>	0	0	0	0	0	1	1	<b>2</b>	<b>19</b>
	4%	2%	<b>3%</b>	0%	0%	0%	0%	0%	5%	5%	<b>3%</b>	<b>3%</b>
Service Interruptions	0	12	<b>12</b>	0	0	0	0	0	1	0	<b>1</b>	<b>13</b>
	0%	3%	<b>2%</b>	0%	0%	0%	0%	0%	5%	0%	<b>2%</b>	<b>2%</b>
Service Extensions	3	5	<b>8</b>	0	0	0	0	1	0	0	<b>1</b>	<b>9</b>
	1%	1%	<b>1%</b>	0%	0%	0%	0%	100%	0%	0%	<b>2%</b>	<b>1%</b>
Scheduling Delays	2	3	<b>5</b>	0	0	0	0	0	0	0	<b>0</b>	<b>5</b>
	1%	1%	<b>1%</b>	0%	0%	0%	0%	0%	0%	0%	<b>0%</b>	<b>1%</b>
All Other Problems	3	13	<b>16</b>	0	1	0	0	0	0	7	<b>8</b>	<b>24</b>
	1%	3%	<b>2%</b>	0%	20%	0%	0%	0%	0%	33%	<b>13%</b>	<b>3%</b>
<b>Total*</b>	<b>233</b>	<b>430</b>	<b>663</b>	<b>3</b>	<b>5</b>	<b>10</b>	<b>2</b>	<b>1</b>	<b>20</b>	<b>21</b>	<b>62</b>	<b>725</b>

\* Based on residential complaints opened in 2022 and evaluated by BCS as of May 5, 2023.

\*\* Categories are for all evaluated residential complaints filed with BCS. See Appendix D-1 for an explanation of complaint categories.

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

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

## Consumer Complaint Rate, Justified Consumer Complaint Rate, and Percent of Justified Consumer Complaints

The following tables show the Consumer Complaint Rate, the Justified Consumer Complaint Rate, and the Percent of Justified Consumer Complaints for each Class A water utility in 2019, 2020, 2021 and 2022. A complaint is considered “justified” if it is found that the utility did not comply with Commission Orders, policies, regulations, reports, Secretarial Letters, or tariffs. BCS evaluates a statistically valid sampling of complaints for each utility.

The Consumer Complaint rate is the number of Consumer Complaints for each 1,000 residential customers.

The justified Consumer Complaint rate is the estimated number of justified Consumer Complaints for each 1,000 residential customers based on a statistically valid sampling of complaints. The justified Consumer Complaint rate is a normalized ratio useful for comparing utility performance among the various utility companies. It is not a percentage.

The Large Class A average justified Consumer Complaint rate increased from 0.12 in 2019 to 0.21 in 2022.

The percent of justified Consumer Complaints is the estimated number of justified complaints divided by the total number of complaints received (multiplied by 100). The percent of justified Consumer Complaints represents a utility’s individual performance.

### 2022 Residential Consumer Complaint Rates, Justified Consumer Complaint Rates, and Percent of Justified Consumer Complaints Major Class A Water Utilities

Utility	Consumer Complaint Rate	Justified Consumer Complaint Rate	Percent of Justified Consumer Complaints
Aqua	0.73	0.15	20.3%
PAWC	1.06	0.27*	25.1%*
<b>Large Class A Average</b>	<b>0.89</b>	<b>0.21</b>	<b>23.6%</b>
Audubon	1.11	0.37	33.3%
Columbia	0.46	0.28	60.0%
Community Utilities	3.77	0.00	0.0%
Newtown Artesian	0.21	0.00	0.0%
Veolia Bethel	0.41	0.00	0.0%
Veolia PA	0.41	0.07	16.7%
York	0.31	0.01	4.8%
<b>“Other Class A” Average**</b>	<b>0.43</b>	<b>0.06</b>	<b>13.6%</b>
<b>All Class A Average***</b>	<b>0.74</b>	<b>0.16</b>	<b>23.0%</b>

\* Based on a probability sample of complaints

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

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



**2019-22 Residential Consumer Complaint Numbers/Rates  
Major Class A Water Utilities**

Utility	2019		2020		2021		2022	
	Number	Rate*	Number	Rate*	Number	Rate*	Number	Rate*
Aqua	249	0.62	164	0.40	290	0.71	300	0.73
PAWC	575	0.94	549	0.87	723	1.14	681	1.06
<b>Large Class A Total</b>	<b>824</b>		<b>713</b>		<b>1,013</b>		<b>981</b>	
<b>Large Class A Average of Rates</b>		<b>0.78</b>		<b>0.64</b>		<b>0.93</b>		<b>0.89</b>
Audubon	2	0.74	1	0.38	5	1.86	3	1.11
Columbia	1	0.10	1	0.10	1	0.10	5	0.46
Community Utilities	2	0.76	23	8.71	0	0.00	10	3.77
Newtown Artesian	0	0.00	0	0.00	2	0.21	2	0.21
Veolia Bethel	0	0.00	1	0.41	0	0.00	1	0.41
Veolia PA	34	0.60	24	0.42	38	0.65	24	0.41
York	20	0.32	9	0.14	11	0.17	21	0.31
<b>“Other Class A” Total</b>	<b>59</b>		<b>59</b>		<b>57</b>		<b>66</b>	
<b>“Other Class A” Avg. of Rates**</b>		<b>0.41</b>		<b>0.03</b>		<b>0.38</b>		<b>0.43</b>
<b>All Class A Total</b>	<b>883</b>		<b>772</b>		<b>1,070</b>		<b>1,047</b>	
<b>All Class A Average of Rates***</b>		<b>0.65</b>		<b>0.56</b>		<b>0.74</b>		<b>0.74</b>

\* The Consumer Complaint rate is the number of Consumer Complaints for each 1,000 residential customers.

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

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

**2019-22 Justified Residential Consumer Complaint Numbers/Rates  
Major Class A Water Utilities**

Utility	2019		2020		2021		2022	
	Number**	Rate***	Number**	Rate***	Number**	Rate***	Number**	Rate***
Aqua	36	0.09	30	0.07	40	0.10	61	0.15
PAWC	94	0.15	28	0.04	73*	0.12*	171*	0.27*
<b>Large Class A Total</b>	<b>130</b>		<b>58</b>		<b>113</b>		<b>232</b>	
<b>Large Class A Average of Rates</b>		<b>0.12</b>		<b>0.06</b>		<b>0.11</b>		<b>0.21</b>
Audubon	0	0.00	0	0.00	0	0.00	1	0.37
Columbia	0	0.00	0	0.00	0	0.00	3	0.28
Community Utilities	0	0.00	1	0.38	0	0.00	0	0.00
Newtown Artesian	0	0.00	0	0.00	0	0.00	0	0.00
Veolia Bethel	0	0.00	1	0.41	0	0.00	0	0.00
Veolia PA	3	0.05	1	0.02	7	0.12	4	0.07
York	1	0.02	0	0.00	0	0.00	1	0.01
<b>“Other Class A” Total</b>	<b>4</b>		<b>3</b>		<b>7</b>		<b>9</b>	
<b>“Other Class A” Avg. of Rates****</b>		<b>0.03</b>		<b>0.03</b>		<b>0.05</b>		<b>0.06</b>
<b>All Class A Total</b>	<b>134</b>		<b>61</b>		<b>120</b>		<b>241</b>	
<b>All Class A Average of Rates*****</b>		<b>0.09</b>		<b>0.05</b>		<b>0.09</b>		<b>0.16</b>

\* Based on a probability sample of complaints.

\*\* Estimated based on the number of Consumer Complaints in CSIS: 2020 as of June 4, 2021; 2021 as of Sept. 10, 2022; and 2022 as of May 5, 2023.

\*\*\* The justified Consumer Complaint rate is the estimated number of justified Consumer Complaints for each 1,000 residential customers based on a statistically valid sampling of complaints. The justified Consumer Complaint rate is a normalized ratio useful for comparing utility performance among the various companies. It is not a percentage.

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

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

**2019-22 Number/Percent of Justified Residential Consumer Complaints  
Major Class A Water Utilities**

Utility	2019		2020		2021			
	Number**	Percent***	Number**	Percent***	Number**	Percent***	Number**	Percent***
Aqua	36	14.5%	30	18.3%	40	13.8%	61	20.3%
PAWC	94	16.3%	28	5.1%	73*	10.1%	171*	25.1%*
<b>Large Class A Total</b>	<b>130</b>		<b>58</b>		<b>113</b>		<b>232</b>	
<b>Large Class A Average</b>		<b>15.8%</b>		<b>8.1%</b>		<b>11.2%</b>		<b>23.6%</b>
Audubon	0	0.0%	0	0.0%	0	0.0%	1	33.3%
Columbia	0	0.0%	0	0.0%	0	0.0%	3	60.0%
Community Utilities	0	0.0%	1	4.3%	0	0.0%	0	0.0%
Newtown Artesian	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Veolia Bethel	0	0.0%	1	100.0%	0	0.0%	0	0.0%
Veolia PA	3	8.8%	1	4.2%	7	18.4%	4	16.7%
York	1	5.0%	0	0.0%	0	0.0%	1	4.8%
<b>“Other Class A” Total</b>	<b>4</b>		<b>3</b>		<b>7</b>		<b>9</b>	
<b>“Other Class A” Avg.****</b>		<b>6.8%</b>		<b>5.1%</b>		<b>12.3%</b>		<b>13.6%</b>
<b>All Class A Total</b>	<b>134</b>		<b>61</b>		<b>120</b>		<b>241</b>	
<b>All Class A Average*****</b>		<b>15.2%</b>		<b>7.9%</b>		<b>11.2%</b>		<b>23.0%</b>

\* Based on a probability sample of complaints.

\*\* Estimated based on the number of Consumer Complaints in CSIS: 2020 as of June 4, 2021; 2021 as of Sept. 10, 2022; and 2022 as of May 5, 2023.

\*\*\* The percent of justified Consumer Complaints is the estimated number of justified complaints divided by the total number of complaints received (multiplied by 100). The percent of justified Consumer Complaints represents a utility’s individual performance.

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

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

## Consumer Complaint Response Time

Response time is the number of days from the date BCS first contacts the utility regarding a complaint to the date the utility provides BCS with its initial informal complaint report. Response time quantifies the speed of a utility’s response to BCS Consumer Complaints. Average response time includes all residential Class A water Consumer Complaints except complaints processed through CURE.

The Large Class A water utility average response time decreased from 21.2 days in 2019 to 11.3 days in 2022.

### 2019-22 Average Response Time to BCS Residential Consumer Complaints Major Class A Water Utilities

Utility	Number of Days			
	2019	2020	2021	2022
Aqua	22.5	14.6	13.7	3.1
PAWC	20.6	12.0	16.1	15.0
<b>Large Class A Average</b>	<b>21.2</b>	<b>12.5</b>	<b>15.4</b>	<b>11.3</b>
Audubon	24.5	9.0	17.6	9.0
Columbia	1.0	5.0	7.0	7.0
Community Utilities	4.5	7.4	0.0	11.1
Newtown Artesian	0.0	0.0	6.0	10.5
Veolia Bethel	0.0	27.0	0.0	20.0
Veolia PA	30.5	29.0	25.6	24.8
York	4.4	10.0	6.8	7.1
<b>“Other Class A” Average*</b>	<b>20.1</b>	<b>16.2</b>	<b>20.1</b>	<b>14.2</b>
<b>All Class A Average**</b>	<b>21.1</b>	<b>12.9</b>	<b>15.7</b>	<b>11.5</b>

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

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

## Payment Arrangement Requests

During 2022, BCS handled 1,991 PARs from residential water customers of the various water utilities. The major Class A water utilities represented 97% (1,936) of the total PARs.

### PAR Rate, Justified PAR Rate, and Percent of Justified PARs

The following tables show the PAR Rate, the Justified PAR Rate, and the Percent of Justified PARs for each Class A water utility in 2019, 2020, 2021 and 2022. A complaint is considered “justified” if it is found that the utility did not comply with Commission Orders, policies, regulations, reports, Secretarial Letters, or tariffs. BCS evaluates a statistically valid sampling of complaints for each utility.

The PAR rate is the number of PARs for each 1,000 residential customers.

The justified PAR rate is the estimated number of justified PARs for each 1,000 residential customers based on a statistically valid sampling of complaints. It is not a percentage. The justified rate is a normalized ratio useful for comparing utility performance among the various utility companies.

The Large Class A average justified PAR rate decreased from 0.60 in 2019 to 0.33 in 2022.

The percent of justified PARs is the estimated number of justified complaints divided by the total number of complaints received (multiplied by 100). The percent of justified PARs represents a utility’s individual performance.

### 2022 Residential Payment Arrangement Request (PAR) Rates, Justified PAR Rates, and Percent of Justified PARs Major Class A Water Utilities

Utility	PAR Rate	Justified PAR Rate	Percent of Justified PARs
Aqua	0.87	0.24	27.5%
PAWC	2.33	0.42*	18.2%*
<b>Large Class A Average</b>	<b>1.60</b>	<b>0.33</b>	<b>20.0%</b>
Audubon	0.37	0.00	0.0%
Columbia	0.37	0.00	0.0%
Community Utilities	3.39	0.75	22.2%
Newtown Artesian	0.10	0.00	0.0%
Veolia Bethel	0.00	0.00	0.0%
Veolia PA	0.53	0.08	16.1%
York	0.46	0.12	25.8%
<b>“Other Class A” Average**</b>	<b>0.50</b>	<b>0.07</b>	<b>19.5%</b>
<b>All Class A Average***</b>	<b>1.23</b>	<b>0.25</b>	<b>20.0%</b>

\* Based on a probability sample of complaints.

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

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

**2019-22 Residential Payment Arrangement Request (PAR) Numbers/Rates  
Major Class A Water Utilities**

Utility	2019		2020		2021		2022	
	Number	Rate*	Number	Rate*	Number	Rate*	Number	Rate*
Aqua	529	1.31	113	0.28	252	0.62	360	0.87
PAWC	2,766	4.51	469	0.75	1,222	1.93	1,499	2.33
<b>Large Class A Total</b>	<b>3,295</b>		<b>582</b>		<b>1,474</b>		<b>1,859</b>	
<b>Large Class A Average of Rates</b>		<b>2.91</b>		<b>0.51</b>		<b>1.27</b>		<b>1.60</b>
Audubon	0	0.00	0	0.00	0	0.00	1	0.37
Columbia	30	3.08	6	0.61	5	0.51	4	0.37
Community Utilities	2	0.76	2	0.76	2	0.76	9	3.39
Newtown Artesian	1	0.10	0	0.00	1	0.10	1	0.10
Veolia Bethel	0	0.00	0	0.00	0	0.00	0	0.00
Veolia PA	48	0.85	11	0.19	29	0.50	31	0.53
York	80	1.29	21	0.33	25	0.39	31	0.46
<b>“Other Class A” Total</b>	<b>161</b>		<b>40</b>		<b>62</b>		<b>77</b>	
<b>“Other Class A” Avg. of Rates**</b>		<b>1.11</b>		<b>0.27</b>		<b>0.42</b>		<b>0.50</b>
<b>All Class A Total</b>	<b>3,456</b>		<b>622</b>		<b>1,536</b>		<b>1,936</b>	
<b>All Class A Average of Rates***</b>		<b>2.31</b>		<b>0.43</b>		<b>0.99</b>		<b>1.23</b>

\* The PAR rate is the number of PARs for each 1,000 residential customers.

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

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

**2019-22 Justified Residential Payment Arrangement Request (PAR) Numbers/Rates  
Major Class A Water Utilities**

Utility	2019		2020		2021		2022	
	Number**	Rate***	Number**	Rate***	Number**	Rate***	Number**	Rate***
Aqua	45	0.11	5	0.01	39	0.62	99	0.24
PAWC	669*	1.09*	75	0.12	133*	1.93*	273*	0.42*
<b>Large Class A Total</b>	<b>714</b>		<b>80</b>		<b>172</b>		<b>372</b>	
<b>Large Class A Average of Rates</b>		<b>0.60</b>		<b>0.07</b>		<b>1.27</b>		<b>0.33</b>
Audubon	0	0.00	0	0.00	0	0.00	0	0.00
Columbia	0	0.00	2	0.20	0	0.51	0	0.00
Community Utilities	0	0.00	0	0.00	1	0.76	2	0.75
Newtown Artesian	0	0.00	0	0.00	0	0.10	0	0.00
Veolia Bethel	0	0.00	0	0.00	0	0.00	0	0.00
Veolia PA	0	0.00	0	0.00	5	0.50	5	0.08
York	2	0.03	0	0.00	0	0.39	8	0.12
<b>“Other Class A” Total</b>	<b>2</b>		<b>2</b>		<b>6</b>		<b>15</b>	
<b>“Other Class A” Avg. of Rates****</b>		<b>0.01</b>		<b>0.02</b>		<b>0.42</b>		<b>0.07</b>
<b>All Class A Total</b>	<b>716</b>		<b>82</b>		<b>178</b>		<b>387</b>	
<b>All Class A Average of Rates*****</b>		<b>0.41</b>		<b>0.05</b>		<b>0.99</b>		<b>0.25</b>

\* Based on a probability sample of complaints.

\*\* Estimated based on the number of PAR complaints in CSIS: 2020 as of June 4, 2021; 2021 as of Sept. 10, 2022; and 2022 as of May 5, 2023.

\*\*\* The justified PAR rate is the estimated number of justified PARs for each 1,000 residential customers based on a statistically valid sampling of complaints. The justified PAR rate is a normalized ratio useful for comparing utility performance among the various companies. It is not a percentage.

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

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

**2019-22 Number/Percent of Justified Residential Payment Arrangement Requests (PARs)  
Major Class A Water Utilities**

Utility	2019		2020		2021		2022	
	Number**	Percent***	Number**	Percent***	Number**	Percent***	Number**	Percent***
Aqua	45	8.5%	5	4.4%	39	15.5%	99	27.5%
PAWC	669*	24.2%*	75	16.0%	133*	10.9%*	273*	18.2%*
<b>Large Class A Total</b>	<b>714</b>		<b>80</b>		<b>172</b>		<b>372</b>	
<b>Large Class A Average</b>		<b>21.7%</b>		<b>13.7%</b>		<b>11.7%</b>		<b>20.0%</b>
Audubon	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Columbia	0	0.0%	2	33.3%	0	0.0%	0	0.0%
Community Utilities	0	0.0%	0	0.0%	1	50.0%	2	22.2%
Newtown Artesian	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Veolia Bethel	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Veolia PA	0	0.0%	0	0.0%	5	17.2%	5	16.1%
York	2	2.5%	0	0.0%	0	0.0%	8	25.8%
<b>“Other Class A” Total</b>	<b>2</b>		<b>2</b>		<b>6</b>		<b>15</b>	
<b>“Other Class A” Average****</b>		<b>1.2%</b>		<b>5.0%</b>		<b>9.7%</b>		<b>19.5%</b>
<b>All Class A Total</b>	<b>716</b>		<b>82</b>		<b>178</b>		<b>387</b>	
<b>All Class A Average*****</b>		<b>20.7%</b>		<b>13.2%</b>		<b>11.6%</b>		<b>20.0%</b>

\* Based on a probability sample of complaints.

\*\* Estimated based on the number of PAR complaints in CSIS: 2020 as of June 4, 2021; 2021 as of Sept. 10, 2022; and 2022 as of May 5, 2023.

\*\*\* The percent of justified PARs is the estimated number of justified complaints divided by the total number of PARs received (multiplied by 100). The percent of justified PARs represents a utility’s individual performance.

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

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



## PAR Response Time

Response time is the number of days from the date BCS first contacts the utility regarding a complaint to the date on which the utility provides BCS with its initial informal complaint report. Response time quantifies the speed of a utility’s response to BCS PAR complaints. The calculation for average response excludes undisputed PARs and CURE complaints.

Aqua’s response time decreased by 14.1 days from 15.6 days in 2019 to 1.5 days in 2022, and PAWC’s response time decreased by 6.1 days from 12.3 days in 2019 to 6.2 days in 2022.

### 2019-22 Average Response Time to BCS Residential Payment Arrangement Requests (PARs) Major Class A Water Utilities

Utility	Number of Days			
	2019	2020	2021	2022
Aqua	15.6	14.4	6.2	1.5
PAWC	12.3	8.9	8.4	6.2
<b>Large Class A Average</b>	<b>13.0</b>	<b>7.3</b>	<b>8.5</b>	<b>4.4</b>
Audubon	0.0	0.0	0.0	2.0
Columbia	10.3	5.4	10.7	13.3
Community Utilities	5.0	3.5	3.5	12.4
Newtown Artesian	5.0	0.0	30.0	2.0
Veolia Bethel	0.0	0.0	0.0	0.0
Veolia PA	29.7	24.3	18.5	20.8
York	4.0	3.6	4.7	5.3
<b>“Other Class A” Average*</b>	<b>11.9</b>	<b>9.9</b>	<b>12.8</b>	<b>13.2</b>
<b>All Class A Average**</b>	<b>13.0</b>	<b>7.5</b>	<b>8.7</b>	<b>4.8</b>

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

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

## Termination and Reconnection of Service

Each month, the electric utilities report to the Commission the number of residential accounts that they terminated for non-payment during the previous month. They also report the number of previously terminated residential accounts that they reconnected during the month. Some water utilities maintain a fairly consistent pattern of termination behavior, while others fluctuate from year to year. The number of reconnections varies from year to year and from utility to utility, depending on a variety of factors. The water utility reconnects a customer's terminated service when a customer either pays their debt in full or makes a significant payment on the debt and agrees to a payment arrangement for the balance owed to the utility or presents a medical certificate.

The following tables indicate the annual number of residential accounts each of the Class A water utilities terminated and reconnected in 2019, 2020, 2021 and 2022. The first table also presents the termination rates for each of these utilities. The termination rate is the number of service terminations divided by the number of residential customers, expressed as a percent. Due to the Covid 19 pandemic, residential terminations were suspended from March 13, 2020, to March 31, 2021. Utilities were encouraged to reconnect residential customers for health and safety reasons. This significantly impacted 2020 utility terminations and reconnections.

### Residential Service Terminations/Termination Rates Major Class A Water Utilities

Utility	Residential Service Terminations				Termination Rates*			
	2019	2020**	2021	2022	2019	2020**	2021	2022
Aqua	7,125	1,255	7,070	5,585	1.76	0.31	1.70	1.35
PAWC	22,749	1,580	20,340	24,625	3.71	0.25	3.21	3.83
<b>Large Class A Total</b>	<b>29,874</b>	<b>2,835</b>	<b>27,410</b>	<b>30,210</b>				
<b>Large Class A Average</b>					<b>3.21</b>	<b>0.35</b>	<b>2.63</b>	<b>2.86</b>
Audubon	13	0	7	29	0.48	0.00	0.26	1.08
Columbia	240	59	132	264	2.47	0.60	1.34	2.43
Community Utilities	158	55	25	80	6.00	2.08	0.94	3.02
Newtown Artesian	33	0	18	14	0.34	0.00	0.19	0.14
Veolia Bethel	0	0	0	0	0.00	0.00	0.00	0.00
Veolia PA	534	82	367	570	0.95	0.14	0.63	0.97
York	883	179	495	269	1.42	0.29	0.78	0.40
<b>"Other Class A" Total</b>	<b>1,861</b>	<b>375</b>	<b>1,044</b>	<b>1,226</b>				
<b>"Other Class A" Average***</b>					<b>1.28</b>	<b>0.26</b>	<b>0.70</b>	<b>0.79</b>
<b>All Class A Total</b>	<b>31,735</b>	<b>3,210</b>	<b>28,454</b>	<b>31,436</b>				
<b>All Class A Average****</b>					<b>2.97</b>	<b>0.34</b>	<b>2.39</b>	<b>2.60</b>

\* The termination rate is the number of service terminations divided by the number of residential customers, expressed as a percent.

\*\* Due to the Covid 19 pandemic, residential terminations were suspended from March 13, 2020, to March 31, 2021. This significantly impacted 2020 utility terminations and reconnections.

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

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

**Residential Service Reconnections  
Major Class A Water Utilities**

Utility	2019	2020*	2021	2022
Aqua	5,135	619	5,090	4,879
PAWC	18,620	1,873	14,239	16,663
<b>Large Class A Total</b>	<b>23,755</b>	<b>2,492</b>	<b>19,329</b>	<b>21,542</b>
Audubon	10	0	5	25
Columbia	183	46	118	228
Community Utilities	102	51	15	55
Newtown Artesian	32	0	13	9
Veolia Bethel	0	0	0	0
Veolia PA	198	72	180	386
York	509	117	217	145
<b>“Other Class A” Total</b>	<b>1,034</b>	<b>286</b>	<b>548</b>	<b>848</b>
<b>All Class A Total</b>	<b>24,789</b>	<b>2,778</b>	<b>19,877</b>	<b>22,390</b>

\* Due to the Covid 19 pandemic, residential terminations were suspended from March 13, 2020, to March 31, 2021. Utilities were encouraged to reconnect residential customers for health and safety reasons. This significantly impacted 2020 utility terminations and reconnections.

## Compliance

BCS provides water utilities with written notice of alleged violations or infractions of the statutes and regulations found during BCS complaint handling. Utilities are provided opportunity to review and respond or appeal. The use of “infraction rate” is intended to help the Commission monitor and maintain customer services at the same level of quality for all customers.

The infraction rates in the table that follows are based on the review of informal complaints that residential consumers filed with BCS from 2019 through 2022. The Infraction Category tables present detailed information about the infractions identified in 2022 complaints to the BCS.

The infraction rate is the number of informally verified infractions per 1,000 residential customers. Dividing per 1,000 customers normalizes the data for comparison purposes. The infraction rate is not a percentage. The reconnection of service category is a high percentage infraction area. Appendix B-1 provides a list of the infractions included in each infraction category.

### Commission Infraction Rates\* Major Class A Water Utilities

Utility	2019	2020	2021	2022
Aqua	0.14	0.08	0.12	0.35
PAWC	0.22	0.06	0.24	0.58
Audubon	0.00	0.00	0.00	0.00
Columbia	0.00	0.10	0.00	0.09
Community Utilities	0.00	0.00	0.76	0.38
Newtown Artesian	0.00	0.00	0.00	0.00
Veolia Bethel	0.00	0.82	0.00	0.00
Veolia PA	0.12	0.02	0.22	0.14
York	0.02	0.00	0.00	0.03

\* The infraction rate is the number of informally verified infractions per 1,000 residential customers. Dividing per 1,000 customers normalizes the data for comparison purposes. The infraction rate is not a percentage.

## 2022 Number and Percent of Major Water Utility Infractions\*

Category**	Aqua	PAWC	Audubon	Columbia	Community Utilities	Newtown Artesian	Veolia Bethel	Veolia PA	York	All Class A Water
Billing and Payment	7	29	0	0	0	0	0	0	0	<b>36</b>
	5%	8%	0%	0%	0%	0%	0%	0%	0%	<b>1%</b>
Meter Reading	5	3	0	0	0	0	0	0	0	<b>8</b>
	3%	1%	0%	0%	0%	0%	0%	0%	0%	<b>&lt;1%</b>
Make-Up Bills	3	10	0	0	0	0	0	2	0	<b>15</b>
	2%	3%	0%	0%	0%	0%	0%	25%	0%	<b>3%</b>
Transfer of Accounts	0	3	0	1	0	0	0	0	0	<b>4</b>
	0%	1%	0%	100%	0%	0%	0%	0%	0%	<b>11%</b>
Credit Standards and Deposits	5	36	0	0	0	0	0	0	0	<b>41</b>
	3%	10%	0%	0%	0%	0%	0%	0%	0%	<b>1%</b>
Termination Grounds	11	22	0	0	0	0	0	0	0	<b>33</b>
	8%	6%	0%	0%	0%	0%	0%	0%	0%	<b>2%</b>
Termination Procedures	26	50	0	0	0	0	0	3	0	<b>79</b>
	18%	13%	0%	0%	0%	0%	0%	38%	0%	<b>8%</b>
Reconnection of Service	45	112	0	0	1	0	0	2	1	<b>161</b>
	31%	30%	0%	0%	100%	0%	0%	25%	50%	<b>26%</b>
Liability – Responsibility for Bills	0	0	0	0	0	0	0	0	0	<b>0</b>
	0%	0%	0%	0%	0%	0%	0%	0%	0%	<b>0%</b>
Landlord/Ratepayer	1	8	0	0	0	0	0	0	0	<b>9</b>
	1%	2%	0%	0%	0%	0%	0%	0%	0%	<b>&lt;1%</b>
Dispute Handling	38	84	0	0	0	0	0	1	1	<b>124</b>
	26%	23%	0%	0%	0%	0%	0%	13%	50%	<b>12%</b>
Other	4	14	0	0	0	0	0	0	0	<b>18</b>
	3%	4%	0%	0%	0%	0%	0%	0%	0%	<b>1%</b>
<b>Total</b>	<b>145</b>	<b>371</b>	<b>0</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>8</b>	<b>2</b>	<b>528</b>

\* The number of verified infractions identified by BCS as of May 4, 2023.

\*\* Appendix B-1 provides a list of the infractions included in each infraction category.

## Municipal Water, Sewer and Stormwater

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

Act 65 required PWSA to file a Compliance Plan with the PUC detailing how the authority would bring its existing operating systems and procedures into compliance with applicable rules, regulations, and orders of the Commission. The law mandated the PUC to conduct an in-depth review of PWSA's Compliance Plan to ensure the Authority's compliance with the Public Utility Code and the Commission's regulations. The Commission's review of the PWSA Compliance Plan, which was filed by the Authority on Sept. 28, 2018, at Docket No. M-2018-2640802 (water) and Docket No. M-2018-2640803 (wastewater), was divided into a two-stage process. Stage 1 focused on urgent infrastructure remediation and improvement and the revenue and financing requirements of maintaining service that supports public health and safety, followed by Stage 2, which focused on PWSA billing and collection issues and the development of a proposed PWSA stormwater tariff. The PUC finalized the Stage 1 proceeding on February 4, 2021. The Stage 2 proceeding pertaining to PWSA billing and collections issues was concluded by the PUC on July 14, 2022, followed by the finalization of the Stage 2 stormwater proceeding on August 25, 2022.

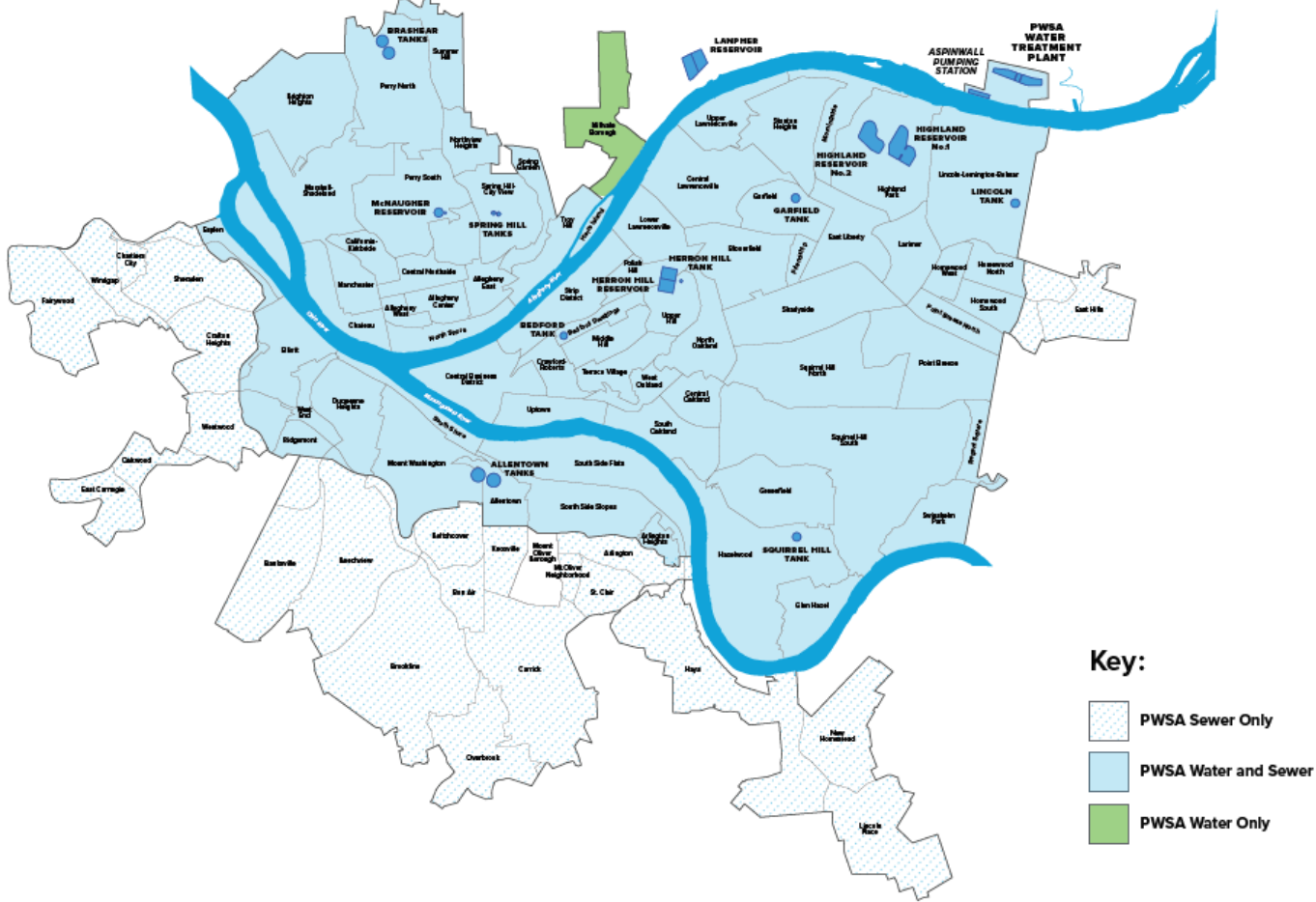
**Stage 2 Compliance Plan: Chapters 14 & 56, DSLPA and Collections:** On March 14, 2022, a Joint Petition for Settlement Regarding PWSA's April 9, 2021, Stage 2 Compliance Plan: Chapters 14 & 56, DSLPA and Collections was filed by the Pittsburgh Water and Sewer Authority, the PUC's Bureau of Investigation and Enforcement, the Office of Consumer Advocate (OCA), Pittsburgh UNITED, and the City of Pittsburgh. The Joint Petition was approved without modification through the issuance of a Recommended Decision by Administrative Law Judge Eranda Vero and Administrative Law Judge Gail M. Chiodo on May 19, 2022, with provisions for the submission of Exceptions and Replies to Exceptions on the Recommended Decision. With no Exceptions or Replies to Exceptions filed, the PUC issued an Order dated July 14, 2022, which approved the March 14, 2022, Joint Petition concerning the Stage 2 Compliance Plan: Chapters 14 & 56, DSLPA and Collections.

**Stage 2 Compliance Plan: Stormwater:** On Jan. 20, 2022, PWSA submitted a Revised Stage 2 Compliance Plan: Stormwater. On June 9, 2022, a Joint Petition for Settlement Regarding PWSA's Jan. 20, 2022, Stage 2 Compliance Plan: Stormwater (Revised) was filed by PWSA, OCA, Pittsburgh United, and the City of Pittsburgh. The Joint Petition was approved without modification through the issuance of a Recommended Decision by Administrative Law Judge Eranda Vero and Administrative Law Judge Gail M. Chiodo on July 19, 2022, with provisions for the submission of Exceptions and Replies to Exceptions on the Recommended Decision. With no Exceptions or Replies to Exceptions filed, the PUC issued an Order dated August 25, 2022, which approved the July 19, 2022, Joint Petition concerning the Stage 2 Compliance Plan: Stormwater (Revised)

In response to the final Orders entered on July 14, 2022, and Aug. 25, 2022, as explained above, PWSA was required to submit Compliance Tariffs that reflect the stipulations in each of the final Orders. By Secretarial Letter dated Nov. 17, 2022, the PUC announced that Supplement No. 1 to Tariff Storm Water – Pa. P.U.C. No. 1 was effective on November 2, 2022.

PWSA is the largest water, sewer and stormwater authority in Pennsylvania and currently serves nearly 100,000 residential customers throughout the City of Pittsburgh and surrounding communities. In addition to providing water, wastewater, and stormwater services, PWSA provides wastewater conveyance to city residents served by the Pennsylvania-American Water Co. and provides water to Millvale Borough residents, whose water system was acquired by the Authority in 2009. The map below provides a detailed illustration of the territory currently served by PWSA. It is important to note that PWSA also provides billing services for the ALCOSAN, whose charges for sewage treatment appear on the billing statements of PWSA customers.

# PWSA Service Areas



Given its divergent services and customer base, PWSA regulation is often complex. For these reasons, the PWSA informal complaint data presented in this chapter are designated as PWSA-Water or PWSA-Sewer based upon the nature of the complaint. As an example, a PWSA-Sewer complaint may involve the sewer service, but the customer may receive both water and sewer bills or just a sewer bill from PWSA. In addition to providing water and sewer services, PWSA also provides stormwater services and serves approximately 5,366 Stormwater only customers. With the enactment of PWSA’s stormwater fee on Jan. 12, 2022, the PUC, for the first time, acquired regulatory authority over the provision of stormwater services by a jurisdictional utility.

The data provided in the tables below include PWSA informal complaint activity for 2022. It should be clarified that PUC regulatory jurisdiction over PWSA was not effective until Apr. 1, 2018. Contacts prior to April 1, 2018, were tracked and categorized as FCRs. In addition, it is important to note that data on PWSA

infractions is not provided in this section as it is for the major water utilities. Despite the conclusion of the compliance proceedings for Stage 1 and Stage 2 as identified above, BCS is continuing to monitor PWSA’s implementation of compliance initiatives emanating from the Stage 1 and Stage 2 proceedings. Therefore, it is premature for BCS to report this data currently. BCS will publish PWSA infraction data in future UCARE reports.

## Total Complaint Rate

The following table shows the Total Complaint Rate, which is the number of all complaints (FCRs and NFIs combined) for each 1,000 residential customers.

### 2019-22 Residential Total Complaint Numbers/Rates Municipal Water and Sewer Utilities

Utility	2019		2020		2021		2022	
	Number	Rate	Number	Rate	Number	Rate	Number	Rate
PWSA-Water	380	3.89	273	2.79	276	2.82	271	2.73
PWSA-Sewer	128	1.31	67	0.68	47	0.48	47	0.47
<b>Total</b>	<b>508</b>		<b>340</b>		<b>323</b>		<b>318</b>	
<b>Average of Rates</b>		<b>2.60</b>		<b>1.74</b>		<b>1.65</b>		<b>1.60</b>

## First Contact Resolutions (FCRs)

The following table shows the number of residential FCR complaints.

### 2019-22 Residential FCRs Municipal Water and Sewer Utilities

Utility	2019	2020	2021	2022
PWSA-Water	72	69	73	63
PWSA-Sewer	26	11	19	13
<b>Average</b>	<b>98</b>	<b>80</b>	<b>92</b>	<b>76</b>

## Consumer Complaints

The following table shows the Consumer Complaint Rate, which is the number of Consumer Complaints for each 1,000 residential customers.



## 2019-22 Residential Consumer Complaint Numbers/Rates Municipal Water and Sewer Utilities

Utility	2019		2020		2021		2022	
	Number	Rate*	Number	Rate*	Number	Rate*	Number	Rate*
PWSA-Water	192	1.96	180	1.84	180	1.84	174	1.75
PWSA-Sewer	55	0.56	37	0.38	20	0.20	26	0.26
<b>Total</b>	<b>247</b>		<b>217</b>		<b>200</b>		<b>200</b>	
<b>Average of Rates</b>		<b>1.26</b>		<b>1.11</b>		<b>1.02</b>		<b>1.01</b>

\* The Consumer Complaint rate is the number of Consumer Complaints for each 1,000 residential customers.

### Consumer Complaint Response Time

Response time is the number of days from the date BCS first contacts the utility regarding a complaint to the date on which the utility provides BCS with its initial informal complaint report. Response time quantifies the speed of a utility's response to BCS PAR complaints. The calculation for average response excludes undisputed PARs and CURE complaints.

The average response time for PWSA increased from 8.7 days in 2019 to 13.2 days in 2022.

## 2019-22 Average Response Time to BCS Residential Consumer Complaints Municipal Water and Sewer Utilities

Utility	Number of Days			
	2019	2020	2021	2022
PWSA-Water	8.4	8.8	11.1	13.0
PWSA-Sewer	10.2	8.0	10.1	14.8
<b>Average</b>	<b>8.7</b>	<b>8.7</b>	<b>11.1</b>	<b>13.2</b>

### Payment Arrangement Requests

The PAR Rate is the number of PARs for each 1,000 residential customers.

## 2019-22 Residential Payment Arrangement Request (PAR) Rates Municipal Water and Sewer Utilities

Utility	2019		2020		2021		2022	
	Number	Rate*	Number	Rate*	Number	Rate*	Number	Rate*
PWSA-Water	127	1.30	32	0.33	27	0.28	34	0.34
PWSA-Sewer	48	0.49	21	0.21	8	0.08	8	0.08
<b>Total</b>	<b>175</b>		<b>53</b>		<b>35</b>		<b>42</b>	
<b>Average of Rates</b>		<b>0.90</b>		<b>0.27</b>		<b>0.18</b>		<b>0.21</b>

\* The PAR rate is the number of PARs for each 1,000 residential customers.

### PAR Response Time

Response time is the number of days from the date BCS first contacts the utility regarding a complaint to the date on which the utility provides BCS with its initial informal complaint report. Response time quantifies the speed of a utility's response to BCS PAR complaints. The calculation for average response excludes undisputed PARs and CURE complaints.

From 2019 to 2022, the average response time for PWSA increased by 5.3 days, from 5.6 days to 10.9 days.

## 2019-22 Average Response Time to BCS Residential Payment Arrangement Requests (PARs) Municipal Water and Sewer Utilities

Utility	Number of Days			
	2019	2020	2021	2022
PWSA-Water	5.7	6.8	8.9	10.4
PWSA-Sewer	7.0	7.1	10.3	8.1
<b>Average</b>	<b>5.6</b>	<b>6.6</b>	<b>9.5</b>	<b>10.9</b>

### Termination and Reconnection of Service

The termination rate is the number of service terminations divided by the number of residential customers, expressed as a percent. The number of PWSA terminations represents the total number of residential customers who were terminated. This total includes customers who received combined water and sewer services, customers who only received sewer service, and those customers who received water service only. The number of PWSA reconnections represents the total number of residential customers who were reconnected. This total includes customers who received combined water and sewer services, customers who only received sewer service, and those customers who received water service only. Due to the Covid 19 pandemic, residential terminations were suspended from March 13, 2020, to March 31, 2021. Utilities were

encouraged to reconnect residential customers for health and safety reasons. This significantly impacted 2020 utility terminations and reconnections.

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

Utility	Residential Service Terminations				Termination Rates*			
	2019	2020**	2021	2022	2019	2020**	2021	2022
PWSA	2,437	206	177	440	2.49	0.21	0.18	0.44

\* The termination rate is the number of service terminations divided by the number of residential customers, expressed as a percent.

\*\* Due to the Covid 19 pandemic, residential terminations were suspended from March 13, 2020, to March 31, 2021. This significantly impacted 2020 utility terminations and reconnections.

### Residential Service Reconnections Municipal Water and Sewer Utilities

Utility	2019	2020*	2021	2022
PWSA	2,029	137	257	151

\* Due to the Covid 19 pandemic, residential terminations were suspended from March 13, 2020, to March 31, 2021. Utilities were encouraged to reconnect residential customers for health and safety reasons. This significantly impacted 2020 utility terminations and reconnections.

## Stormwater Complaints

In 2022, PWSA began assessing a separate stormwater fee to fund stormwater projects and initiatives necessary to improve stormwater management in Pittsburgh. BCS tracks the number of PWSA complaints that contain a stormwater component. The following table shows the total number of residential PWSA informal complaints in 2022, compared to the number of complaints that included a dispute regarding stormwater. Overall, in 2022, 7% of the residential informal complaints for PWSA included a dispute regarding stormwater.

### 2022 Stormwater Complaints Residential Informal Complaints (Consumer Complaints and PARs) Municipal Water and Sewer Utilities

Utility	Total Number of Complaints	Total Number of Complaints with a Stormwater Component	% of Complaints with a Stormwater Component
	2022	2022	2022
PWSA-Water	208	9	4%
PWSA-Sewer	34	9	27%
<b>Total</b>	<b>242</b>	<b>18</b>	<b>7%</b>

## Programs That Assist Low-Income Customers

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

**Aqua Pennsylvania Inc. (Aqua)** – The Helping Hand Program is for customers at 200% of the federal poverty level and below. Prior to April 2020, a customer account must have been more than 21 days past due with at least \$110 unpaid water bills to qualify for the program. Beginning April 2020, program requirements were relaxed due to the COVID-19 pandemic and various outreach methods, including proactive outreach and support to the low-income customer base not enrolled on the program, were used to increase customer awareness of the program. The relaxed requirements continued through 2022. Additionally, all eligible customers enrolled in the program received a credit and all Helping Hand customers that made a payment during the month received a \$25 credit.

Each household enrolled in the Helping Hand program receives a conservation kit that contains water saving devices. The customer also receives water usage and conservation information. Customers who make their payments on time and in full receive a credit of \$25 per month applied to their arrearage.

At the end of December 2022, there were 688 active participants in the Helping Hand program. The company provided \$55,950 in arrearage forgiveness credits to 2,238 program participants.

Aqua received approval in its recent base rate proceeding to initiate a Customer Assistance Program (CAP) for its customers. Building upon the assistance provided through Helping Hand, the CAP maintains the \$25 per month credit towards pre-program arrearages for timely payments made. It also incorporates a tiered discount program, providing the highest level of discount to those with the lowest incomes. As with Helping Hand, incomes up to 200% of Federal Poverty Level can qualify. Customers must provide income documentation or complete a Zero Income Form to enroll and will be recertified on a recurring basis according to their income type. Customers with high usage may be identified for a conservation kit or kits can also be requested by participants.

As the rollout of the program was dependent on significant billing system changes, only about a dozen customers were enrolled at the end of 2022, but that figure has already grown to 500 as of April 2023. A comprehensive consumer education and outreach plan was developed and is underway in 2023.

**Pennsylvania American Water Co. (PAWC)** – In 1991, PAWC established the “Help to Others” (H2O) program. Beginning March 8, 2021, the H2O program increased the benefit to its water customers by providing an 85% discount on their monthly service fees – a savings of about \$15 per month in 2022 and a 10% discount on their volumetric water usage. In addition to a discount for water, PAWC increased the discount for wastewater customers. A 30% discount was provided on the total wastewater billing for customers who qualified. There were 28,759 customers in 2022 who were billed at the discounted rate (as of December 2022).

The H2O program also provides water-saving devices and conservation education. Nearly 1,800 income-eligible customers during the 2022 calendar year were provided with water-saving devices.

As part of the H2O program, PAWC participates with the Dollar Energy Fund to provide cash grants of up to \$500 per year for qualifying water and wastewater customers. Dollar Energy Fund is a hardship fund administrator that provides cash assistance to utility customers who need help in paying their utility bills. In 2022 PAWC’s annual contribution for grants to income-eligible water customers was \$500,000. The company’s contribution for wastewater grants to income-eligible customers was \$100,000.

During the 2022 calendar year, PAWC's shareholders and customers provided \$380,174 in hardship fund benefits to 1,238 water customers for an average benefit of \$307. In addition, PAWC's shareholders provided \$71,333 in grants for the 2022 calendar year for wastewater customers. The funds provided benefits to 215 customers for an average benefit of \$332.

**Pittsburgh Water and Sewer Authority (PWSA)** – PWSA's internal PGH2O Cares team administers its customer assistance programs for low income, residential customers in need.

The Bill Discount Program provides a percentage-based reduction of fixed monthly water, wastewater conveyance and stormwater charges for customers who are at or below 150% of the Federal Poverty Level. In 2022, bill discounts increased to 100% of the fixed monthly water and wastewater conveyance base charges and 85% of the stormwater charges. A total of 6,073 customers were enrolled in the Bill Discount Program. PGH2O Cares personnel proactively reach out to customers to recertify for the Bill Discount Program every two years. For customers with past due balances who are enrolled in the Bill Discount Program, PWSA credits their account in the amount of \$30 for each on-time, monthly payment in an active payment plan to assist with reducing their arrears. In 2022, PWSA provided 9,113 Arrearage Forgiveness Credits, expunging \$261,900 in customer debt.

The Hardship Grant Program extends grants up to \$300 per year for customers who are at or below 150% of the Federal Poverty Level. The PGH2O Cares team accepts grant applications from customers without a termination notice or sincere effort of payment. In 2022, PWSA provided \$80,910 in grants to 337 customers for an average benefit of \$240.

The Winter Moratorium provides confirmed low-income customers who are at or below 300% of the Federal Poverty Level with the assurance that their water service will not be terminated due to non-payment from December 1st through March 31st. The PGH2O Cares team provides payment counseling and payment arrangements to those customers with past due charges.

The Community Environmental Project offered private side lead line replacements for customers who are at or below 300% of the Federal Poverty Level. PWSA started construction in late 2018 and the program was completed in early 2021. Private side service line materials were funded by a \$1.8 million settlement with the Pennsylvania Department of Environmental Protection. During the program, PWSA worked at 732 locations, verified that 308 of these locations did not have either public or private lead service lines, and replaced 389 private and 288 public lead service lines. A total of over \$4.3 million was spent on the program, including the \$1.8 million associated with private lead service line replacements.

In October 2020, PWSA rolled out a Line Replacement Reimbursement Program. This income-based reimbursement program provides for 100% reimbursement of private side lead service line replacement costs for customers who are at or below 300% of the Federal Poverty Level, with a decreasing reimbursement percentage to 500% of the Federal Poverty Level, after which water customers are eligible for a \$1,000 stipend if they hire a private plumber and replace their own private lead service line. During 2022, a total of 303 applications were approved for reimbursement, and 33 reimbursements were paid at a total cost of nearly \$167,000.

PWSA customers who are billed for sewage treatment charges on behalf of the Allegheny County Sanitary Authority (ALCOSAN) are also eligible for assistance through ALCOSAN's Clean Water Assistance Fund. This program follows the same income requirements as PWSA's Bill Discount Program. In 2022, ALCOSAN provided \$155,510 in grants to 3,849 eligible PWSA customers.

**Veolia Water Bethel** (Veolia Bethel) – Veolia Bethel implemented the “Veolia Cares” program in 2005. Veolia 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 \$300 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 2022 program year, the utility did not provide any grants.

**Veolia Water Pennsylvania** (Veolia PA) – Veolia PA implemented the “Veolia Cares” program in 2005. Veolia 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 \$300 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 2022 program year, the utility provided grants totaling \$10,603 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.

The utility expended \$544 in 2022 for customer plumbing repairs and enrolled a total of three new customers in 2022 in the York Water Cares program. As of program end 2022, eight customers received arrearage forgiveness benefits totaling \$390 for an average benefit of approximately \$48 per customer. The utility anticipates an annual savings of \$825 in 2022 in costs for termination proceedings that may be avoided as a result of customer participation in the York Water Cares program.

**Federal Low Income Household Water Assistance Program (LIHWAP)** – On January 4, 2022, LIHWAP opened in Pennsylvania to assist in providing relief to residential water and wastewater customers who had difficulty paying their bills. The Federal government recognized that the COVID-19 pandemic amplified unaffordability concerns for many families. This temporary Federal emergency grant program:

- restored water and wastewater service to 760 homes in Pennsylvania;
- prevented 10,200 Pennsylvania families from having their water and wastewater services disconnected; and
- served over 38,000 Pennsylvania families in total.

By October 2022, Pennsylvania’s \$43.2 million LIHWAP budget was fully spent and the program ended.

## 10. Telecommunications Industry

During 2022, BCS handled Consumer Complaints related to basic voice service, broadband, Lifeline, payment arrangement requests (PARs) and FCRs from the customers of a variety of telecommunications service providers, including incumbent local exchange carriers (ILECs), competitive local exchange carriers (CLECs), long-distance companies, resellers and eligible telecommunications carriers (ETCs).

In 2022, there were 536 providers of telecommunications services with certificates of public convenience in Pennsylvania. Of these, 35 were ILECs. The ILECs included 30 non-major utilities that each served less than 50,000 residential customers and five major utilities that each served over 50,000 residential customers. In 2022, based on § 64.201 reporting, Pennsylvania local exchange carriers supplied service to an average of 796,589 residential telecommunications service access lines each month.

Because the five major ILECs provided voice telecommunications service to the vast majority of those telecommunications access service lines (an average of 672,934 residential service lines each in 2022), this chapter will focus on the five major ILECs – Brightspeed f/k/a CenturyLink (**Brightspeed**), Frontier Communications Commonwealth Telephone Co. (**Frontier Commonwealth**), Verizon North LLC (**Verizon North**), Verizon Pennsylvania LLC (**Verizon PA**), and Windstream Communications (**Windstream**).

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

The majority of broadband related complaints received by BCS include a dispute regarding voice telecommunications service. For tracking and evaluative purposes, BCS assigns a telecommunications quality of service "reason for contact" code to these complaints. BCS identifies issues related to jurisdictional broadband by using a special indicator on the complaint; however, that indicator does not track the specific Chapter 30 issue at this time.

When BCS identifies instances when the ILEC may have failed to meet their Chapter 30 obligations, the ILEC is notified of the infraction. These informal infractions are reported later in this chapter in the Infraction Categories tables.

Unlike the electric, gas, and water chapters, the analyses of the five utilities that appear in this chapter include complaints about competition-related issues such as slamming, competition-related service complaints and billing problems. This is the 18th year that competition-related complaints are included in the analyses of the telecommunications utilities.

Act 183 of 2004 replaced the original Chapter 30 that expired due to the sunset provisions included in the Act. Among other issues, it provided the opportunity for an ILEC to petition the Commission for a determination of the competitive status of its services that are also offered by other providers. On March 4, 2015, the Commission entered an Opinion and Order at Docket Nos. P-2014-2446303 and P-2014-2446304, which granted competitive reclassification for basic local exchange telecommunications services in

153 of the 504 Verizon PA and Verizon North wire centers throughout the state.<sup>12</sup> The reclassification temporarily waived certain sections of 52 Pa. Code, Chapters 63<sup>13</sup> and 64<sup>14</sup> for a maximum of five years or until the Commission promulgates a final rulemaking addressing competitive reclassification.

On Sept. 21, 2020, the Commission initiated a rulemaking for Chapters 63 and 64 in response to changes in competitive market conditions in the telecommunications industry and to address whether the waivers granted in the 2015 Verizon Reclassification order should be made permanent on an industry wide basis. In August 2022, the Commission finalized the rulemaking making many of the temporary waivers from the Reclassification Order permanent, rescinding obsolete regulations, and creating several new regulations. The new regulations allow for electronic billing, and electronic suspension and termination notices, and require regulated LECs to provide consumers with an annual confidentiality statement.

The finalized regulations also made the Automatic Customer Transfer (warm transfer) available to all regulated LECs. Warm transfer is a voluntary process used to resolve consumer complaints. Currently, only Verizon and Frontier telecommunications utilities participate in the process. Verizon has participated in the process since 2012, while Frontier began their participation in October 2021. When a complainant contacts BCS to file an informal complaint involving Verizon or Frontier, the customer is offered an opportunity for a “warm transfer” back to the utility to attempt to resolve the complaint one last time directly with the utility. If the utility resolves the complaint to the customer’s satisfaction, the utility submits an abbreviated report to BCS and the informal complaint is withdrawn or closed. BCS may ask for additional information from the utility if the customer is not satisfied and the case will be investigated further by BCS staff.

### 2020-22 Warm Transfers Completed Residential Informal Complaints (Consumer Complaints and PARs) Major Local Telecommunications Utilities

Utility	Total Number of Complaints			Total Number of Warm Transfers Completed			% of Warm Transfers Completed		
	2020	2021	2022	2020	2021	2022	2020	2021	2022
Frontier Commonwealth*	N/A	122	228	N/A	5	18	N/A	4%	8%
Verizon North	81	70	29	14	13	4	17%	19%	14%
Verizon PA	798	951	593	97	160	73	12%	17%	12%
<b>Total</b>	<b>879</b>	<b>1,432</b>	<b>850</b>	<b>111</b>	<b>178</b>	<b>95</b>	<b>13%</b>	<b>12%</b>	<b>11%</b>

\*Frontier Commonwealth began accepting warm transfers in October 2021.

### Total Complaint Rate

The following tables show the Total Complaint Rate, which is the number of all complaints (FCRs and NFIs combined) for each 1,000 residential customers.

<sup>12</sup> See Appendix B of Docket Nos. P-2014-2446303 and P-2014-2446304, March 4, 2015.

<sup>13</sup> See Appendix D of Docket Nos. P-2014-2446303 and P-2014-2446304, March 4, 2015.

<sup>14</sup> See Appendix E of Docket Nos. P-2014-2446303 and P-2014-2446304, March 4, 2015.



## 2019-22 Residential Total Complaint Numbers/Rates Major Local Telecommunications Utilities

Utility	2019		2020		2021		2022	
	Number	Rate	Number	Rate	Number	Rate	Number	Rate
Brightspeed	77	0.72	75	0.74	233	2.47	177	2.15
Frontier Commonwealth	199	2.49	118	1.60	165	2.43	291	4.60
Verizon North	116	1.02	113	1.09	94	1.04	40	0.50
Verizon PA	1,298	2.36	1,114	2.23	1,356	3.17	839	2.25
Windstream	108	1.43	120	1.61	136	1.73	112	1.49
<b>Total</b>	<b>1,798</b>		<b>1,540</b>		<b>1,984</b>		<b>1,459</b>	
<b>Average of Rates</b>		<b>1.94</b>		<b>1.81</b>		<b>2.61</b>		<b>2.17</b>

### Consumer Complaints

Although BCS handled Consumer Complaints about different types of telecommunications service providers in 2022, the complaints predominantly came from the residential customers of the five major ILECs.

During 2022, BCS handled 1,201 Consumer Complaints from residential customers of the various telecommunications service providers. The five major ILECs represented 88% (1,062) of the total Consumer Complaints, while 14 Consumer Complaints were received for the non-major ILECs. In 2022, 71 Consumer Complaints were from residential customers of the CLECs operating in Pennsylvania, and BCS handled 41 Consumer Complaints regarding ETCs that provide Lifeline services. The remaining Consumer Complaints in 2022 were from residential customers of other telecommunications providers such as long-distance carriers, resellers and Voice over Internet Protocol (VoIP).

### Consumer Complaint Categories

The following table shows the number and percentage of 2022 Consumer Complaints in each of the 11 categories used by BCS policy analysts for compliance evaluation. These categories are for all evaluated residential complaints filed with BCS.

Of the 862 Consumer Complaints evaluated, the top category of telecommunications complaints accounts for three quarters of the total: 75% unsatisfactory service complaints. See Appendix D-2 for an explanation of complaint categories.

**Number and Percent of Consumer Complaints by Dispute Category**  
**2022 Complaints Evaluated\***  
**Major Local Telecommunications Utilities**

Category**	Brightspeed	Frontier Common- wealth	Verizon North	Verizon PA***	Wind- stream	Telecom- munications Industry
Unsatisfactory Service	84	177	20	308	61	<b>650</b>
	74%	88%	74%	70%	79%	<b>75%</b>
Service Delivery	16	16	2	42	9	<b>85</b>
	14%	8%	7%	9%	12%	<b>10%</b>
Billing Disputes	7	1	3	27	3	<b>41</b>
	6%	1%	11%	6%	4%	<b>5%</b>
Service Terminations	3	1	0	13	0	<b>17</b>
	3%	1%	0%	3%	0%	<b>2%</b>
Discontinuance/Transfer	0	0	0	9	0	<b>9</b>
	0%	0%	0%	2%	0%	<b>1%</b>
Competition	0	0	0	0	0	<b>0</b>
	0%	0%	0%	0%	0%	<b>0%</b>
Annoyance Calls	0	0	0	2	0	<b>2</b>
	0%	0%	0%	<1%	0%	<b>&lt;1%</b>
Non-Recurring Charges	0	1	0	2	0	<b>3</b>
	0%	1%	0%	<1%	0%	<b>&lt;1%</b>
Toll Services	1	1	0	0	1	<b>3</b>
	1%	1%	0%	0%	1%	<b>&lt;1%</b>
Credit and Deposits	0	0	0	1	0	<b>1</b>
	0%	0%	0%	<1%	0%	<b>&lt;1%</b>
All Other Problems	2	5	2	39	3	<b>51</b>
	2%	2%	7%	9%	4%	<b>6%</b>
<b>Total</b>	<b>113</b>	<b>202</b>	<b>27</b>	<b>443</b>	<b>77</b>	<b>862</b>

\* Based on residential complaints opened in 2022 and evaluated by BCS as of May 5, 2023.

\*\* Categories are for all evaluated residential complaints filed with BCS. See Appendix D-2 for an explanation of complaint categories.

\*\*\* Based on a probability sample of complaints.

### Consumer Complaint Rate, Justified Consumer Complaint Rate, and Percent of Justified Consumer Complaints

The following tables show the Consumer Complaint Rate, the Justified Consumer Complaint Rate, and the Percent of Justified Consumer Complaints for each major telecommunications utilities in 2019, 2020, 2021 and 2022. A complaint is considered “justified” if it is found that the utility did not comply with Commission Orders, policies, regulations, reports, Secretarial Letters, or tariffs. BCS evaluates a statistically valid sampling of complaints for each utility.

The Consumer Complaint rate is the number of Consumer Complaints for each 1,000 residential customers.

The justified Consumer Complaint rate is the estimated number of justified Consumer Complaints for each 1,000 residential customers based on a statistically valid sampling of complaints. The justified Consumer Complaint rate is a normalized ratio useful for comparing utility performance among the various utility companies. It is not a percentage.

From 2019 to 2022, the justified Consumer Complaint rates increased for Brightspeed and Frontier Commonwealth, while the rates decreased for Verizon North, Verizon PA and Windstream. Frontier Commonwealth had a 2022 justified Consumer Complaint rate that was higher than the industry average.

The percent of justified Consumer Complaints is the estimated number of justified complaints divided by the total number of complaints received (multiplied by 100). The percent of justified Consumer Complaints represents a utility’s individual performance.

**2022 Residential Consumer Complaint Rates,  
Justified Consumer Complaint Rates, and Percent of Justified Consumer Complaints  
Major Local Telecommunications Utilities**

Utility	Consumer Complaint Rate	Justified Consumer Complaint Rate	Percent of Justified Consumer Complaints
Brightspeed	1.61	0.94	58.3%
Frontier Commonwealth	3.58	2.66	74.3%
Verizon North	0.36	0.21	58.6%
Verizon PA	1.57	0.94	60.1%
Windstream	1.19	0.51	42.7%
<b>Average</b>	<b>1.66</b>	<b>1.05</b>	<b>61.4%</b>

\* Based on a probability sample of complaints

**2019-22 Residential Consumer Complaint Numbers/Rates  
Major Local Telecommunications Utilities**

Utility	2019		2020		2021		2022	
	Number	Rate*	Number	Rate*	Number	Rate*	Number	Rate*
Brightspeed	48	0.45	51	0.50	176	1.87	132	1.61
Frontier Commonwealth	138	1.73	83	1.13	121	1.78	226	3.58
Verizon North	82	0.72	81	0.78	70	0.78	29	0.36
Verizon PA	839	1.53	795	1.59	944	2.20	586	1.57
Windstream	85	1.12	94	1.26	110	1.40	89	1.19
<b>Total</b>	<b>1,192</b>		<b>1,104</b>		<b>1,421</b>		<b>1,062</b>	
<b>Average of Rates</b>		<b>1.11</b>		<b>1.05</b>		<b>1.61</b>		<b>1.66</b>

\* The Consumer Complaint rate is the number of Consumer Complaints for each 1,000 residential customers.

**2019-22 Justified Residential Consumer Complaint Numbers/Rates  
Major Local Telecommunications Utilities**

Utility	2019		2020		2021		2022	
	Number**	Rate***	Number**	Rate***	Number**	Rate***	Number**	Rate***
Brightspeed	19	0.18	27	0.27	106	1.12	77	0.94
Frontier Commonwealth	93	1.16	41	0.56	64	0.94	168	2.66
Verizon North	51	0.45	50	0.48	40	0.44	17	0.21
Verizon PA	550*	1.00*	456*	0.91*	520*	1.21*	352*	0.94*
Windstream	48	0.63	42	0.56	48	0.61	38	0.51
<b>Total</b>	<b>761</b>		<b>616</b>		<b>778</b>		<b>652</b>	
<b>Average of Rates</b>		<b>0.69</b>		<b>0.56</b>		<b>0.87</b>		<b>1.05</b>

\* Based on a probability sample of complaints.

\*\* Estimated based on the number of Consumer Complaints in CSIS: 2020 as of June 4, 2021; 2021 as of Sept. 10, 2022; and 2022 as of May 5, 2023.

\*\*\* The justified Consumer Complaint rate is the estimated number of justified Consumer Complaints for each 1,000 residential customers based on a statistically valid sampling of complaints. The justified Consumer Complaint rate is a normalized ratio useful for comparing utility performance among the various companies. It is not a percentage.

**2019-22 Number/ Percent of Justified Residential Consumer Complaints  
Major Telecommunications Utilities**

Utility	2019		2020		2021		2022	
	Number**	Percent***	Number**	Percent***	Number**	Percent***	Number**	Percent***
Brightspeed	19	39.6%	27	52.9%	106	60.2%	77	58.3%
Frontier Commonwealth	93	67.4%	41	49.4%	64	52.9%	168	74.3%
Verizon North	51	62.2%	50	61.7%	40	57.1%	17	58.6%
Verizon PA	550*	65.6%*	456*	57.4%*	520*	55.1%*	352*	60.1%*
Windstream	48	56.5%	42	44.7%	48	43.6%	38	42.7%
<b>Total</b>	<b>761</b>		<b>616</b>		<b>778</b>		<b>652</b>	
<b>Average</b>		<b>63.8%</b>		<b>55.8%</b>		<b>54.8%</b>		<b>61.4%</b>

\* Based on a probability sample of complaints.

\*\* Estimated based on the number of Consumer Complaints in CSIS: 2020 as of June 4, 2021; 2021 as of Sept. 10, 2022; and 2022 as of May 5, 2023.

\*\*\* The percent of justified Consumer Complaints is the estimated number of justified complaints divided by the total number of complaints received (multiplied by 100). The percent of justified Consumer Complaints represents a utility's individual performance.

## Consumer Complaint Response Time

Response time is the number of days from the date BCS first contacts the utility regarding a complaint to the date the utility provides BCS with its initial informal complaint report. Response time quantifies the speed of a utility’s response to BCS Consumer Complaints. Response time to Consumer Complaints for the telecommunications utilities is calculated using all categories of Consumer Complaints, including automatic customer transfers (also known as Warm Transfer).

Verizon PA had the shortest Consumer Complaint response time in 2022, while Brightspeed took the most time to respond.

### 2019-22 Average Response Time to BCS Residential Consumer Complaints Major Local Telecommunications Utilities

Utility	Number of Days			
	2019	2020	2021	2022
Brightspeed	17.1	21.1	21.7	25.5
Frontier Commonwealth	12.9	10.3	13.0	19.7
Verizon North	14.0	13.8	13.3	17.1
Verizon PA	13.3	13.4	15.1	14.2
Windstream	16.1	12.6	15.4	16.0
<b>Average</b>	<b>13.6</b>	<b>13.5</b>	<b>16.7</b>	<b>17.0</b>

## Payment Arrangement Requests (PARs)

Telecommunications service consists of three components: basic service, non-basic service and toll service. BCS does not handle requests for payment arrangements that involve toll or non-basic services because with respect to telecommunications payment arrangements, the PUC does not exert payment arrangement jurisdiction over competitive services. For the telecommunications industry, PARs are principally contacts to BCS or to utilities involving a request for payment terms for arrearages associated with basic service. Failure to enter into a payment arrangement or pay arrearages due for basic service may result in suspension, and subsequent termination, of basic service.<sup>15</sup> Suspension of basic telecommunications service involves the temporary cessation of service without the consent of the customer, while termination of basic service is the permanent cessation of service. The majority of PARs are from customers who contact BCS to request payment arrangements after they have received a suspension notice.

Under Chapter 64, a customer contact in response to a suspension notice is a dispute (as the term is defined in Section 64.2) only if the contact includes a disagreement with respect to the application of a provision of Chapter 64. Where telecommunications complaints involving telecommunications service suspension are concerned, failure to negotiate a payment arrangement does not in itself mean that a dispute

<sup>15</sup> Suspension or termination of basic local exchange service can also occur when a customer refuses to voluntarily transition their service from traditional copper to fiber during an ILEC’s network transformation.

exists. Consequently, in this report, telecommunications complaints that involve PARs have been separated from telecommunications PARs that also involve a dispute. For the telecommunications industry, PARs that involve a dispute are classified as Consumer Complaints. During 2022, BCS handled 13 PARs from residential customers of the various telecommunications service providers. The five major telecommunications utilities represented 85% (11) of the totals PARs.

The 2019, 2020, 2021 and 2022 justified PAR rates and response times for the major telecommunications utilities are presented in the tables that follow.

### PAR Rate, Justified PAR Rate, and Percent of Justified PARs

The following tables show the PAR Rate, the Justified PAR Rate, and the Percent of Justified PARs for each major telecommunications utility in 2019, 2020, 2021 and 2022. A complaint is considered “justified” if it is found that the utility did not comply with Commission Orders, policies, regulations, reports, Secretarial Letters, or tariffs. BCS evaluates a statistically valid sampling of complaints for each utility.

The PAR rate is the number of PARs for each 1,000 residential customers.

The justified PAR rate is the estimated number of justified PARs for each 1,000 residential customers based on a statistically valid sampling of complaints. It is not a percentage. The justified rate is a normalized ratio useful for comparing utility performance among the various utility companies.

The percent of justified PARs is the estimated number of justified complaints divided by the total number of complaints received (multiplied by 100). The percent of justified PARs represents a utility’s individual performance.

### 2022 Residential Payment Arrangement Request (PAR) Rates, Justified PAR Rates, and Percent of Justified PARs Major Local Telecommunications Utilities

Utility	PAR Rate	Justified PAR Rate	Percent of Justified PARs
Brightspeed	0.00	0.00	0.0%
Frontier Commonwealth	0.03	0.03	100.0%
Verizon North	0.00	0.00	0.0%
Verizon PA	0.02	0.00	14.3%
Windstream	0.03	0.00	0.0%
<b>Average</b>	<b>0.02</b>	<b>0.01</b>	<b>27.3%</b>

**2019-22 Residential Payment Arrangement Request (PAR) Numbers/Rates  
Major Local Telecommunications Utilities**

Utility	2019		2020		2021		2022	
	Number	Rate*	Number	Rate*	Number	Rate*	Number	Rate*
Brightspeed	6	0.06	0	0.00	2	0.02	0	0.00
Frontier Commonwealth	2	0.03	5	0.07	1	0.01	2	0.03
Verizon North	1	0.01	0	0.00	0	0.00	0	0.00
Verizon PA	10	0.02	3	0.01	7	0.02	7	0.02
Windstream	0	0.00	3	0.04	1	0.01	2	0.03
<b>Total</b>	<b>19</b>		<b>11</b>		<b>11</b>		<b>11</b>	
<b>Average of Rates</b>		<b>0.02</b>		<b>0.02</b>		<b>0.01</b>		<b>0.02</b>

\* The PAR rate is the number of PARs for each 1,000 residential customers.

**2019-22 Justified Residential Payment Arrangement Request (PAR) Numbers/Rates  
Major Local Telecommunications Utilities**

Utility	2019		2020		2021		2022	
	Number*	Rate**	Number*	Rate**	Number*	Rate**	Number*	Rate**
Brightspeed	0	0.00	0	0.00	0	0.00	0	0.00
Frontier Commonwealth	1	0.01	3	0.04	0	0.00	2	0.03
Verizon North	0	0.00	0	0.00	0	0.00	0	0.00
Verizon PA	2	0.00	3	0.01	4	0.01	1	0.00
Windstream	0	0.00	0	0.00	0	0.00	0	0.00
<b>Total</b>	<b>3</b>		<b>6</b>		<b>4</b>		<b>3</b>	
<b>Average of Rates</b>		<b>0.00</b>		<b>0.01</b>		<b>0.00</b>		<b>0.01</b>

\* Estimated based on the number of PAR complaints in CSIS: 2020 as of June 4, 2021; 2021 as of Sept. 10, 2022; and 2022 as of May 5, 2023.

\*\* The justified PAR rate is the estimated number of justified PARs for each 1,000 residential customers based on a statistically valid sampling of complaints. The justified PAR rate is a normalized ratio useful for comparing utility performance among the various companies. It is not a percentage.



## 2019-22 Number/Percent of Justified Residential Payment Arrangement Requests (PARs) Major Local Telecommunications Utilities

Utility	2019		2020		2021		2022	
	Number*	Percent**	Number*	Percent**	Number*	Percent**	Number*	Percent**
Brightspeed	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Frontier Commonwealth	1	50.0%	3	60.0%	0	0.0%	2	100.0%
Verizon North	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Verizon PA	2	20.0%	3	100.0%	4	57.1%	1	14.3%
Windstream	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>3</b>		<b>6</b>		<b>4</b>		<b>3</b>	
<b>Average</b>		<b>15.8%</b>		<b>54.5%</b>		<b>36.4%</b>		<b>27.3%</b>

\* Estimated based on the number of PAR complaints in CSIS: 2020 as of June 4, 2021; 2021 as of Sept. 10, 2022; and 2022 as of May 5, 2023.

\*\* The percent of justified PARs is the estimated number of justified complaints divided by the total number of PARs received (multiplied by 100). The percent of justified PARs represents a utility's individual performance.

### PAR Response Time

Response time is the number of days from the date BCS first contacts the utility regarding a complaint to the date on which the utility provides BCS with its initial informal complaint report. Response time quantifies the speed of a utility's response to BCS PAR complaints. The calculation for average response is calculated using all categories of PARs, including automatic customer transfers (also known as Warm Transfer).

From 2019 to 2022, the average response time to PARs for Verizon PA and Windstream increased, while the average response time decreased for Brightspeed, Frontier Commonwealth and Verizon North.

## 2019-22 Average Response Time to BCS Residential Payment Arrangement Requests (PARs) Major Local Telecommunications Utilities

Utility	Number of Days			
	2019	2020	2021	2022
Brightspeed	21.7	0.0	26.0	0.0
Frontier Commonwealth	19.0	12.4	13.0	8.0
Verizon North	1.0	0.0	0.0	0.0
Verizon PA	5.9	10.7	10.1	11.3
Windstream	0.0	3.5	8.0	18.5
<b>Average</b>	<b>12.0</b>	<b>10.1</b>	<b>13.1</b>	<b>9.6</b>

## Termination of Service

Chapter 64 defines suspension as a temporary cessation of service without the consent of the customer. Termination of service, according to Chapter 64, is the permanent end of service after a suspension without the consent of the customer. Most PARs are complaints relating to the termination of telecommunications service and are registered during the suspension phase. Many customers who have their basic service suspended are able to make payment arrangements and avoid termination. Those seeking to restore service are treated by the service providers as applicants.

Previously the termination rate for the telecommunications industry was calculated in the UCARE reports as the number of terminations for each 1,000 residential customers; however, the termination rate for the telecommunications industry is now being calculated consistent with the other industries as defined below. The 2019-2021 termination rates have been updated in the table below.

The termination rate is the number of service terminations divided by the number of residential customers, expressed as a percent. Due to the Covid 19 pandemic, residential terminations were suspended from March 13, 2020, to March 31, 2021. This significantly impacted 2020 utility terminations.

### Residential Service Terminations/Termination Rates Major Local Telecommunications Utilities

Utility	Residential Service Terminations				Termination Rates*			
	2019	2020**	2021	2022	2019	2020**	2021	2022
Brightspeed	5,736	636	3,912	4,308	5.34	0.63	4.15	5.24
Frontier Commonwealth	2,268	720	1,548	1,152	2.84	0.98	2.28	1.82
Verizon North	2,556	588	2,316	1,332	2.26	0.57	2.57	1.67
Verizon PA	14,232	3,288	13,536	7,308	2.59	0.66	3.16	1.96
Windstream	2,976	1,692	2,592	3,192	3.94	2.27	3.31	4.25
<b>Total</b>	<b>27,768</b>	<b>6,924</b>	<b>23,904</b>	<b>17,292</b>				
<b>Average</b>					<b>3.00</b>	<b>0.81</b>	<b>3.15</b>	<b>2.57</b>

\* The termination rate is the number of service terminations divided by the number of residential customers, expressed as a percent.

\*\* Due to the Covid 19 pandemic, residential terminations were suspended from March 13, 2020, to March 31, 2021. This significantly impacted 2020 utility terminations and reconnections.

## Compliance

BCS provides utilities with written notice of alleged violations or infractions of the statutes and regulations found during BCS complaint handling. Utilities are provided opportunity to review and respond or appeal. The use of “infraction rate” is intended to help the Commission monitor and maintain customer services at the same level of quality for all telecommunications customers, regardless of who provides their telecommunications services.

The infraction rates in the table that follows are based on informal complaints that residential complainants filed with BCS from 2019 through 2022. The Infraction Category tables present detailed information about the infractions identified in 2022 complaints to the BCS.

The infraction rate is the number of informally verified infractions per 1,000 residential customers. Dividing per 1,000 customers normalizes the data for comparison purposes. The infraction rate is not a percentage. The category with customer trouble reports is consistently a high percentage infraction area. Appendix B-2 provides a list of the infractions included in each infraction category.

### Commission Infraction Rates\* Major Local Telecommunications Utilities

Utility	2019	2020	2021	2022
Brightspeed	0.32	0.45	3.26	2.08
Frontier Commonwealth	5.84	1.58	4.06	6.77
Verizon North	1.87	1.36	1.37	0.65
Verizon PA	2.93	2.20	2.12	2.89
Windstream	2.51	0.95	2.02	1.16

\* The infraction rate is the number of informally verified infractions per 1,000 residential customers. Dividing per 1,000 customers normalizes the data for comparison purposes. The infraction rate is not a percentage.

## 2022 Number and Percent of Major Local Telecommunications Utility Infractions\*

Category**	Brightspeed	Frontier Commonwealth	Verizon North	Verizon PA	Windstream	Telecommunications Industry
Broadband	3	0	1	8	0	<b>12</b>
	2%	0%	2%	1%	0%	<b>1%</b>
Network Modernization Plans	5	29	2	21	4	<b>61</b>
	3%	7%	4%	2%	5%	<b>4%</b>
Complaint Procedures	37	68	18	206	27	<b>356</b>
	22%	16%	35%	19%	31%	<b>24%</b>
Quality of Service	13	28	7	98	13	<b>159</b>
	8%	7%	13%	9%	15%	<b>10%</b>
Service Records	11	58	5	310	8	<b>392</b>
	6%	14%	10%	29%	9%	<b>14%</b>
Customer Trouble Reports	76	204	12	315	22	<b>629</b>
	44%	48%	23%	29%	25%	<b>34%</b>
Installation of Service	0	0	0	1	0	<b>1</b>
	0%	0%	0%	<1%	0%	<b>&lt;1%</b>
Migration	0	0	0	1	0	<b>1</b>
	0%	0%	0%	<1%	0%	<b>&lt;1%</b>
Billing and Payment	3	5	1	8	0	<b>17</b>
	2%	1%	2%	1%	0%	<b>1%</b>
Slamming and Cramming	0	0	0	0	0	<b>0</b>
	0%	0%	0%	0%	0%	<b>0%</b>
Credit and Deposits	0	0	0	0	0	<b>0</b>
	0%	0%	0%	0%	0%	<b>0%</b>
Suspension and Termination	0	1	0	1	2	<b>4</b>
	0%	<1%	0%	<1%	2%	<b>1%</b>
Dispute Procedures	5	1	1	17	1	<b>25</b>
	3%	<1%	2%	2%	1%	<b>2%</b>
Other	18	34	5	90	10	<b>157</b>
	11%	8%	10%	8%	11%	<b>10%</b>
<b>Total</b>	<b>171</b>	<b>428</b>	<b>52</b>	<b>1,076</b>	<b>87</b>	<b>1,814</b>

\* The number of verified infractions identified by BCS as of May 4, 2023.

\*\* Appendix B-2 provides a list of the infractions included in each infraction category.

## Universal Service Programs

As part of its ongoing responsibilities, BCS monitors the universal service programs of local telecommunications companies and ETCs. For the telecommunications industry, universal service programs<sup>16</sup> include Lifeline Service (Lifeline),<sup>17</sup> Lifeline 100 Service (Lifeline 100)<sup>18</sup> through Verizon PA and Verizon North and the Verizon PA Universal Telephone Assistance Program (UTAP). These programs ensure that low-income consumers have access to telecommunications service by providing discounts or credits for telecommunications service. The Commission approved the implementation of Pennsylvania's first universal service program for local telecommunications companies in 1989.<sup>19</sup> In December 1997, the Commission approved Lifeline service plans for 44 incumbent telecommunications utilities which led to the statewide implementation of telecommunications utilities' Lifeline programs in 1998.

### Lifeline

The Commission's May 19, 2005, Final Lifeline Order (Final Order), at Docket No. M-00051871 expanded the Lifeline program eligibility to be consistent with the Federal Communications Commission's (FCC) programs.<sup>20</sup> The Final Order added an income-only based factor (income at or below 135% of the federal poverty guidelines) as a new criterion for Pennsylvania's Lifeline program eligibility. Second, the Final Order directed all carriers designated by the Commission as Eligible Telecommunication Carriers (ETCs)<sup>21</sup> to implement the Lifeline provisions contained in Chapter 30. Under these provisions,<sup>22</sup> ETCs are to inform new and existing customers about the availability of Lifeline services. They also must permit eligible Lifeline service customers to purchase any number of optional services (i.e., call waiting) at the tariffed rates for these services.

In August 2010, the Commission adopted the final Policy Statement on the Commonwealth of Pennsylvania Guidelines for Designation and Annual Recertification as an ETC for purposes of Federal Universal Service Support (ETC Guidelines).<sup>23</sup> Designation as an ETC for provision of Lifeline service permits the wireline and wireless providers to participate in the federal Universal Service Fund's (USF) Lifeline program in order to receive low-income support from the federal USF.<sup>24</sup>

On March 2, 2012, the FCC issued a Final Rule<sup>25</sup> which reformed and began to modernize the federal USF Lifeline program. The reforms were intended to accomplish the following: (1) strengthen protections against waste, fraud and abuse; (2) improve program administration and accountability; (3) improve

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<sup>16</sup> With the exception of UTAP, these programs are supported fully or in part by federal universal service funds.

<sup>17</sup> Lifeline f/k/a/ Lifeline 135 in previous UCARE reports.

<sup>18</sup> Lifeline 100 f/k/a Lifeline in previous UCARE reports.

<sup>19</sup> The Link-Up America Program was the first universal service program. The FCC eliminated this program in 2012.

<sup>20</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>21</sup> Jurisdictional ETCs include all ILECs and other providers of communications services that have obtained ETC designation from the state commission or the FCC. The Commission designates wireless providers as ETCs. ETCs may receive federal universal service funding.

<sup>22</sup> 66 Pa. C.S. § 3019 (f)(1-4).

<sup>23</sup> Docket No. M-2010-2164741, July 29, 2010, which codifies the guidelines at 52 Pa. Code § 69.2501.

<sup>24</sup> 47 U.S.C. § 214(e)(3-4) In a community where no telecommunications utility provides services supported by federal universal support mechanisms, the FCC (for interstate) and PUC (for intrastate) will determine which telecommunications utility is best able to provide such service. Any telecommunications utility ordered to provide such service will be designated as an ETC for that community and become eligible to receive universal service support. This is the carrier of last resort (COLR) obligation.

<sup>25</sup> 47 C.F.R. Part 54 – Universal Service

enrollment and consumer disclosures; (4) initiate modernization of the program for broadband; and (5) constrain the growth of the program to reduce the burden of all who contribute to the federal USF.

The Commission’s Nov. 9, 2016, Order at Docket No. M-2016-2566383 adopted the eligibility criteria from the FCC’s Lifeline and Link Up Reform and Modernization, Third Report and Order (2016 Order), WC Docket No. 11-42 released Apr. 27, 2016. Effective Dec. 2, 2016, eligibility for Lifeline support was streamlined to include the following programs: Supplemental Nutrition Assistance Program (SNAP), Medicaid, Supplemental Security Insurance (SSI), Federal Public Housing Assistance and Veterans Pension Benefits. The income-based eligibility (135% of Federal Poverty Guidelines) did not change. The Commission’s order required ETCs designated by the Commission to adhere to all federal ETC rules, regulations and standards including: (1) broadband as a supported service; (2) minimum service standards for broadband; (3) mobile voice and mobile broadband access services;<sup>26</sup> (4) the establishment of a National Verifier; and (5) port freeze rules.<sup>27</sup> Port freeze rules were eliminated in a subsequent Lifeline order.

Currently Lifeline is offered by ILECs, CLECs, and certain wireless, cable and satellite companies. As of Dec. 31, 2022, there were 254,489 low-income Pennsylvania consumers enrolled in Lifeline. Wireless, cable, and satellite ETCs provided Lifeline service to 246,164 of those consumers. The vast majority of Lifeline participants (246,158) in Pennsylvania chose a wireless ETC to provide their service. The following table shows enrollment activity for the major telecommunications utilities’ Lifeline programs in 2019, 2020, 2021 and 2022. Information regarding total Lifeline enrollment can be found in the Lifeline Tracking Report.

### 2019-22 Lifeline Service Activity

Utility	Total Number of Customers Who Received Lifeline Service				Total Number of Customers Enrolled as of December			
	2019	2020	2021	2022	2019	2020	2021	2022
Brightspeed	760	685	502	445	607	474	412	369
Frontier Commonwealth	848	780	602	558	733	565	528	447
Verizon North*	1,903	1,518	1,374	1,186	1,042	925	800	668
Verizon PA*	10,190	8,484	7,542	6,532	7,828	6,965	6,017	4,944
Windstream	1,220	1,053	1,204	1,189	906	923	941	867
<b>Total</b>	<b>14,921</b>	<b>12,520</b>	<b>11,224</b>	<b>9,910</b>	<b>11,116</b>	<b>9,852</b>	<b>8,698</b>	<b>7,295</b>

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

As of Dec. 1, 2022, the monthly Lifeline credit for stand-alone voice service is \$5.25, or \$9.25 for bundled service that meets the minimum standards for broadband. The monthly discount for the Verizon companies’ Lifeline 100 is \$7.75.

<sup>26</sup> As of Dec. 1, 2019, the minimum standard for wireless talk is 1,000 minutes, the minimum wireless broadband usage is 2 GB per month on a 3G or better network. For bundled service, only one service must meet the minimum standard. The minimum standard for fixed broadband is 18 Mbps download and 2 Mbps upload, with minimum usage of 1,000 GB per month.

<sup>27</sup> In its 2016 Lifeline Order, the FCC established port freeze rules, during which Lifeline subscribers were not eligible to change providers. The port freeze for voice only service was 60 days, the port freeze for broadband and wireless broadband service was 12 months.

As of Dec. 1, 2022, the minimum broadband standard for Lifeline subscribers who receive wireline service is 25 Mbps download and 3 Mbps upload, with a minimum of 1,280 GB of usage each month. If the wireline provider is unable to meet minimum speed standard, they must provide the highest performing broadband service available with at least 4 Mbps download and 1 Mbps upload. For Lifeline subscribers who receive service through wireless ETCs, the minimum standard is 4.5 GB per month of 3G or better mobile data.

## Universal Telephone Assistance Program

Verizon PA implemented UTAP along with its Lifeline service program as part of a settlement agreement that was approved by the Commission Aug. 4, 1995 (P-00930715, P-00950958). Verizon PA is the only utility that offers a financial assistance program that helps existing Lifeline 100 customers and qualified Lifeline 100 applicants (with a pre-existing basic service arrearage) to restore their basic telecommunications service. The Dollar Energy Fund manages UTAP and distributes funds to qualified customers and Lifeline applicants. The following table shows the number of customers enrolled in the Verizon PA Lifeline 100 program and the UTAP grants provided in 2019, 2020, 2021 and 2022.

### 2019-22 Verizon PA Lifeline 100 and UTAP Summary

	2019	2020	2021	2022
Total Number of Customers Enrolled as of December	3,435	2,814	2,446	2,282
Number of Customers Given Assistance	13	4	0	0
Total Amount of Funds Distributed	\$994	\$247	\$0	\$0
Average Grant Amount	\$76.46	\$61.75	\$0.00	\$0

## Automatic Notification Program

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

## ETC Designation

In its 2005 First Universal Service Report and Order, the FCC established minimum requirements for telecommunications carriers to be designated as ETCs and encouraged states that exercise jurisdiction over ETC designation to adopt the same requirements.<sup>28</sup> This order applied to both wireline and wireless carriers.

<sup>28</sup> See Matter of Federal-State Joint Board of Universal Service, First Report and Order, CC Docket No. 96-45, 20 FCC Rcd 6371 (released March 17, 2005).

On Apr. 11, 2008, the FCC conditionally designated TracFone Wireless, Inc. (TracFone) as the first wireless ETC in PA. The FCC's designation allowed TracFone to provide Lifeline service and receive reimbursement for Lifeline from the Federal USF but did not make the utility eligible for USF high-cost support.<sup>29</sup> At the time of the FCC designation, Pennsylvania had not yet exerted jurisdiction over wireless providers for the purpose of ETC designation.

On Aug. 2, 2010, the PUC entered its Final Policy Statement Order, at Docket No. M-2010-2164741. This order adopted the FCC minimum requirements for ETC designation but also established additional state specific requirements.<sup>30</sup> On Dec. 22, 2010, Virgin Mobile USA, LP became the first wireless ETC designated by the PA PUC.

## Non-Traditional ETC Designation

In 2018, the FCC conducted the Connect America Fund Phase II, Auction 903 to allocate support to provide broadband in certain eligible areas across the United States. Auction 903 ran from July 24, 2018, to Aug. 21, 2018. Pennsylvania had five winning bidders that will deploy broadband at 54,812 locations for a total of \$56,831,061 in support over 10 years. Among the auction winners were several non-traditional telecommunications providers including an electric cooperative and two satellite providers.

On Dec. 7, 2020, the FCC released the results of the Rural Digital Opportunity Fund, Auction 904. Pennsylvania had 13 winning bidders that will deploy broadband to 184,505 eligible locations for a total of \$368,743,200 in support over 10 years. The winners included traditional telecommunications providers, cable providers, fiber providers, fixed wireless hybrid providers, and satellite providers. Sixty-four percent of the winning bids in PA were for broadband meeting or exceeding 100 Mbps download speeds, while a number of the winning bids were for gigabit (1,000 Mbps) broadband speeds.

To be eligible to receive support from both Auction 903 and Auction 904, each of the winning bidders must be designated as an ETC in Pennsylvania. The following table shows the ETCs approved to operate in PA as of Dec. 30, 2022.

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<sup>29</sup> See TracFone ETC Designation Order, CC Docket No. 96-45, Order, 23 FCC Rcd 6206 (released April 11, 2008).

<sup>30</sup> See 66 Pa. C.S. § 3019(f).



## 2022 PA Wireless and Non-Traditional ETCs

Utility	PUC Docket #	Date of ETC Designation
Airvoice Wireless d/b/a Feel Safe Wireless	P-2013-2379431	7/9/2014
American Broadband d/b/a American Assistance	P-2013-2362571	11/5/2015
AmeriMex d/b/a Safety Net Wireless	P-2013-2369557	3/6/2014
Boomerang Wireless d/b/a enTouch Wireless	P-2014-2421056	9/1/2016
Centre WISP	P-2021-3024219	8/15/2021
Claverack Communications d/b/a Claverack Rural Electric Coop	P-2021-3023996	7/15/2021
Global Connection Inc. d/b/a Stand Up Wireless	P-2011-2245213	9/13/2012
iWireless d/b/a Access Wireless	P-2011-2235119	9/3/2015
Limitless Mobile	P-2012-2287339	5/24/2012
Q-Link	P-2011-2275830	4/18/2013
Sage Telecom d/b/a TruConnect	P-2013-2398807	1/15/2015
Tag Mobile	P-2011-2241542	12/5/2012
Telrite Corp d/b/a Life Wireless	P-2011-2398807	9/26/2013
T-Mobile d/b/a InReach Wireless**	P-2011-2275748	5/24/2012
Time Warner Cable d/b/a Charter (cable) Spectrum (voice)	P-2021-3023594	7/15/2021
Tracfone d/b/a Safelink*	n/a	n/a
Tri-County Electric Cooperative d/b/a Tri-County Connections	P-2018-3005127	4/27/2019
Velocity.Net Communications	P-2018-3006180	1/16/2020
Viasat Carrier Services	P-2018-3004983	4/30/2020
Virgin Mobile d/b/a Assurance Wireless	P-2010-2155915	12/22/2010
Youngsville TV d/b/a Blue Fiber	P-2021-3023604	8/26/2021
YourTel America d/b/a TerraCom	P-2011-2226044	10/14/2011
Zito West d/b/a Zito Mifflin County	P-2021-3023622	9/15/2021

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

\*\* T-Mobile d/b/a InReach Wireless abandoned their ETC designation as of 12/31/2022.

### National Lifeline Verifier

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

On Dec. 4, 2018, the National Verifier launched in Pennsylvania. Initially, ETCs were not required to use the verifier; however, 23 Pennsylvania ETCs successfully used the verifier to obtain an eligibility decision during the first month. As of March 5, 2019, applicants must receive an approved eligibility decision from the National Verifier to enroll in Lifeline. To receive an eligibility decision, applicants have the option of applying

for Lifeline through the ETC of their choice, submitting the Universal Lifeline Application and Household Worksheet by mail or by applying through the consumer portal at [checklifeline.org](http://checklifeline.org).

## Chapter 30 Broadband

Act 183 of 2004 also addressed balancing the mandated deployment of broadband facilities while promoting the provision of Universal Service. In both the original Chapter 30 enacted in 1993 and its replacement in 2004, all ILECs were required to provide 100% broadband availability to their retail access lines by Dec. 31, 2015. Act 183 granted ILECs reductions to their Commission-mandated productivity offsets in their already approved alternative ratemaking plans if they advanced their 100% broadband deployment target date to 2008 or 2013, except for Verizon Pennsylvania, LLC, which retained its 2015 target date but also received a reduction in its productivity offset.

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

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

The Pennsylvania Broadband Bill of Rights directed consumers to contact BCS if their local telecommunications company cannot provide broadband, or the service does not meet Pennsylvania requirements.

Many of the telecommunication complaints that BCS receives, also include issues with broadband speed and/or availability. The following table shows the total number of residential telecommunications informal complaints in 2019, 2020, 2021 and 2022 for each of the five major telecommunications utilities, compared to the number of complaints that included a dispute regarding broadband speed, access or availability. Overall, in 2022, 30% of the residential informal complaints for the major telecommunications utilities included a dispute regarding broadband speed, access, or availability, compared to 36% in 2019.

**2019-22 Chapter 30 Broadband Complaints**  
**Residential Informal Complaints (Consumer Complaints and PARs)**  
**Major Local Telecommunications Utilities**

Utility	Total Number of Complaints				Total Number of Complaints with a Broadband Component				% of Complaints with a Broadband Component			
	2019	2020	2021	2022	2019	2020	2021	2022	2019	2020	2021	2022
Brightspeed	54	51	178	132	23	17	55	54	43%	33%	31%	41%
Frontier Commonwealth	140	88	122	228	80	31	54	106	57%	35%	44%	46%
Verizon North	83	81	70	29	26	29	26	7	31%	36%	37%	24%
Verizon PA	849	798	951	593	266	208	217	111	31%	26%	23%	19%
Windstream	85	97	111	91	36	42	35	41	42%	43%	32%	45%
<b>Total</b>	<b>1,211</b>	<b>1,115</b>	<b>1,432</b>	<b>1,073</b>	<b>431</b>	<b>327</b>	<b>387</b>	<b>319</b>	<b>36%</b>	<b>29%</b>	<b>27%</b>	<b>30%</b>

# Glossary of Terms

**Automatic Customer Transfer** (also known as Warm Transfer) – The process through which BCS is able to immediately and contemporaneously transfer a customer inquiry or service or billing complaint to a jurisdictional telecommunications public utility that has voluntarily elected to participate in such an arrangement.

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

**Change in Income** – A decrease in household income of 20% or more if the customer's household income level exceeds 200% of the Federal poverty level or a decrease in household income of 10% or more if the customer's household income level is 200% or less of the Federal poverty level.

**Competitive Local Exchange Carrier (CLEC)** – A telecommunications provider that competes with other incumbent local exchange telecommunications providers to provide local telecommunications service.

**Consumer Complaint Rate** – The number of Consumer Complaints per 1,000 residential customers.

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

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

**Customer Assistance Programs (CAPs)** – Payment assistance and debt forgiveness programs for low-income households. CAPs are intended to provide more affordable monthly bills based on a set energy burden standard. CAP billing credits may be applied to ongoing usage as long as the household remains current and timely in paying its monthly CAP payments. CAP charges may take the form of a discounted price on actual usage on either all or a portion of the usage,<sup>31</sup> a percentage of the monthly bill,<sup>32</sup> or a monthly amount that is calculated upon a percentage of the household income.<sup>33</sup> Percentage of income plans are correlated directly to the household's income and the utility's energy burden targets. CAP's debt forgiveness feature freezes a household's unpaid past debt upon entry into the program. As long as the household remains current and timely on their future CAP payments, the past debt is not collected and is forgiven in incremental amounts over time.

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

**CURE (Customer & Utility Resolution Effort) Complaint** – A voluntary program designed to better manage workload, improve customer satisfaction, and reduce costs. The utility contacts the complainant and attempts to achieve a resolution. If mutual satisfaction is reached, the utility and complainant notify BCS the informal

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<sup>31</sup> Also referred to as "rate discount bill."

<sup>32</sup> Also referred to as "percent of bill."

<sup>33</sup> Also referred to as a "percent of income payment" (PIP).

complaint can be closed without further investigation, and the utility isn't required to submit a full utility report.

**Electric Distribution Company (EDC)** – The 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.

**First Contact Resolution (FCR) Complaints** – Formerly labeled as “Inquiries.” FCRs are contacts to BCS that did not require follow-up investigation beyond the initial contact or call-back.

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

**Incumbent Local Exchange Carrier (ILEC)** – A telecommunications utility that was providing local telecommunications service in 1996 to customers in a specific geographic area designated by the FCC and held a certificate from the PUC.

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

**Infraction Rate** – The number of informally verified infractions per 1,000 residential customers (includes infractions drawn from both Consumer Complaints and PARs).

**Justified Consumer Complaint Rate** – The number of justified Consumer Complaints per 1,000 residential customers.

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

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

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

**Major Class A Water Utility** – A non-municipal water utility with annual revenues of \$1 million or more for three consecutive years.

**Major Electric Distribution Company (EDC)** – An EDC with more than 100,000 residential customers.

**Major Natural Gas Distribution Company (NGDC)** – An NGDC with more than 100,000 residential customers.

**Major Local Telecommunications Utility** – An ILEC that served over 50,000 residential customers. The major local telecommunications utilities provided voice telecommunications service to the vast majority of the telecommunications access service lines.

**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 customer.

**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.

**Non-Major Electric Utility** – An EDC with less than 100,000 residential customers or an EGS.

**Non-Major Natural Gas Utility** – An NGDC with less than 100,000 residential customers or an NGS.

**Non-Major Telecommunications Utility** – An incumbent local exchange carrier that served less than 50,000 residential customers, a CLEC, a long-distance company, an IXC, a reseller, or an ETC.

**Non-Major Water Utility** – A municipal water utility or a non-municipal water utility with revenues of either less than \$1 million annually or greater than \$1 million annually for no more than two consecutive years.

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

**Payment Arrangement Requests (PARs)** – Requests for payment arrangements principally include one of the following situations: suspension / termination of service is pending; service has been suspended/terminated and the complainant needs payment terms to have service restored; or, the complainant wants to retire an arrearage.

**People-Delivered Utility Service** – Scheduling delays, conduct of personnel, and damages.

**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** – The time span in days from the date of BCS's first contact with the utility regarding a complaint to the date on which the utility provides BCS with its report regarding the complaint. Response time quantifies the speed of a utility's response to BCS Consumer Complaints and PARs.

**Significant Change in Circumstances** – Any of the following criteria when verified by the public utility and experienced by customers with household income less than 300% of the Federal poverty level: (1) The onset of a chronic or acute illness resulting in a significant loss in the customer's household income. (2) Catastrophic damage to the customer's residence resulting in a significant net cost to the customer's household. (3) Loss of the customer's residence. (4) Increase in the customer's number of dependents in the household.

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

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

# List of Acronyms

<b><u>Acronym</u></b>	<b><u>Definition</u></b>
ALCOSAN	Allegheny County Sanitary Authority
BCS	Bureau of Consumer Services
CAP	Customer Assistance Program
CARES	Customer Assistance and Referral Evaluation Services
CLEC	Competitive Local Exchange Carrier
COLR	Carrier of Last Resort
CRS	Collections Reporting System
CSIS	Consumer Services Information System
CTS	Compliance Tracking System
CURE	Customer & Utility Resolution Effort
d/b/a	Doing Business As
DHS	Department of Human Services
DSLPA	Discontinuance of Services to Leased Premises Act
EDC	Electric Distribution Company
EGS	Electric Generation Supplier
ETC	Eligible Telecommunications Carrier
FCC	Federal Communications Commission
FCR	First Contact Resolution (f/k/a Inquiries)
f/k/a	Formerly Known As
FPIG	Federal Poverty Income Guidelines
GI	General Inquiry
H2O	Help to Others
ILEC	Incumbent Local Exchange Carrier
LEC	Local Exchange Carrier
LECRS	Local Exchange Carrier Reporting System
LIHWAP	Low Income Household Water Assistance Program
LIURP	Low-Income Usage Reduction Program
Mbps	Megabits per second
NFI	Needs Further Investigation (i.e., consumer complaint and PARs)
NGDC	Natural Gas Distribution Company
NGS	Natural Gas Supplier
NLAD	National Lifeline Accountability Database
NOPR	Notice of Proposed Rulemaking
OALJ	Office of Administrative Law Judge
OCA	Office of Consumer Advocate
PAR	Payment Arrangement Request
PAWC	Pennsylvania American Water Co.
PIP	Percent of Income Payment
PUC	Public Utility Commission
PWSA	Pittsburgh Water and Sewer Authority
SNAP	Supplemental Nutrition Assistance Program
SSI	Supplemental Security Insurance
UCARE	Utility Consumer Activities Report and Evaluation
USAC	Universal Service Administrative Company
USF	Universal Service Fund
UTAP	Universal Telephone Assistance Program
VoIP	Voice over Internet Protocol

# Appendices



## Appendix A

### 2019-22 Number of Residential Customers Major Electric Distribution Companies

Utility	2019	2020	2021	2022
Duquesne	538,534	541,210	543,300	545,897
Met-Ed	504,685	508,753	512,216	515,226
PECO+	1,505,328	1,518,942	1,530,346	1,538,908
Penelec	500,877	501,635	501,816	501,009
Penn Power	146,018	147,020	148,138	148,927
PPL	1,233,837	1,243,501	1,251,196	1,256,135
UGI-Electric	55,131	54,969	55,084	55,122
West Penn	627,499	630,039	632,415	631,990
<b>Total</b>	<b>5,111,909</b>	<b>5,146,069</b>	<b>5,174,511</b>	<b>5,193,214</b>

+ PECO statistics include electric and gas.

### 2019-22 Number of Residential Customers Major Natural Gas Distribution Companies

Utility	2019	2020	2021	2022
Columbia	400,044	405,653	407,892	409,611
NFG	196,778	197,945	198,007	196,742
Peoples+	335,583	591,996	593,089	594,250
Peoples-Equitable+	247,801	n/a	n/a	n/a
PGW	480,347	486,934	488,817	487,335
UGI-Gas++	367,175	604,375	611,631	618,589
UGI North++	157,025	n/a	n/a	n/a
<b>Total</b>	<b>2,184,753</b>	<b>2,286,903</b>	<b>2,299,436</b>	<b>2,306,527</b>

+ Due to the Peoples Natural Gas merger, effective Jan. 1, 2020, the Peoples data includes Peoples-Equitable.

++ Due to the UGI Gas merger, effective Jan. 1, 2020, the UGI Gas data includes UGI Central and UGI North.

## Appendix A (Continued)

### 2019-22 Number of Residential Customers Major Class A Water Utilities

Utility	2019	2020	2021	2022
Aqua	404,017	406,313	409,411	412,598
PAWC	613,434	628,402	632,758	642,776
<b>Large Class A Total</b>	<b>1,017,451</b>	<b>1,034,715</b>	<b>1,042,169</b>	<b>1,055,374</b>
Audubon	2,712	2,631	2,687	2,695
Columbia	9,733	9,778	9,838	10,886
Community Utilities <sup>4</sup>	2,632	2,640	2,647	2,651
Newtown Artesian	9,625	9,639	9,649	9,658
Veolia Bethel	2,462	2,439	2,450	2,452
Veolia PA	56,266	57,138	58,175	58,926
York	62,128	62,697	63,323	67,214
<b>“Other Class A” Total</b>	<b>145,558</b>	<b>146,962</b>	<b>148,769</b>	<b>154,482</b>
<b>All Class A Total</b>	<b>1,163,009</b>	<b>1,181,677</b>	<b>1,190,938</b>	<b>1,209,856</b>

### 2019-22 Number of Residential Customers Municipal Water and Sewer Utilities

Utility	2019	2020	2021	2022
PWSA	97,726	97,834	97,915	99,183

### 2019-22 Number of Residential Customers Major Local Telecommunications Utilities

Utility	2019	2020	2021	2022
Brightspeed	107,497	101,327	94,357	82,160
Frontier Commonwealth	79,861	73,598	68,032	63,202
Verizon North	113,253	103,753	90,239	79,746
Verizon PA	550,138	498,595	428,220	372,782
Windstream	75,613	74,511	78,396	75,044
<b>Total</b>	<b>926,362</b>	<b>851,784</b>	<b>759,244</b>	<b>672,934</b>

# Appendix B-1

## Categories of Infractions

### Electric, Gas and Water

**Billing and Payment** – 56.2-Definition of Billing Month, 56.2-Definition of Billing Period, 56.11, 56.12(7)-(8), 56.15, 56.21(1)-(5), 56.22, 56.24, and 56.25

**Meter Reading** – 56.12(1)-(6)

**Make-Up Bills** – 56.14, 57.24, 59.22, and 65.9

**Transfer of Accounts** – 56.16, 56.36(b)(3), and 56.72

**Credit Standards and Deposits** – 56.31-35, 56.36(b)(1)-(2), 56.37, 56.38, 56.41, 56.42, 56.51, 56.53, and 1404

**Termination Grounds** – 56.2-Definition of Delinquent Acct. and 56.81-83

**Termination Procedures** – 56.21(6), 56.91-97, 56.99, 56.100, 56.111, 56.112, 56.114, 56.335, 56.340, and 1406

**Reconnection of Service** – 56.115, 56.191(a)-(c), 56.421, and 1407

**Liability - Responsibility for Bills** – 56.2-Definition of Applicant, 56.2-Definition of Customer, 56.191(d)-(e), and 56.285

**Landlord/Ratepayer** – 1521-1533

**Dispute Handling** – 56.2-Definition of Dispute, 56.2-Definition of Initial Inquiry, 56.141-152, 56.181, 59.21(f)(1), 59.21(f)(3) and 65.3(a)

**Other** – 56.1, 56.202, 56.71, 57.22, 57.172, 65.8, 501, 1501, Tariff, and Moratorium Order M-2020-3019244

## Appendix B-2

### Categories of Infractions

### Telecommunications

Broadband – 3012-Definition of Broadband

Network Modernization Plans – 3014

Complaint Procedures – 63.1, 63.15, and 63.59

Quality of Service – 63.14, 63.23, 63.53, and 63.63

Service Records – 63.22

Customer Trouble Reports – 63.24, 63.57, and 64.52

Installation of Service – 63.58

Migration – 63.201-221

Billing and Payment – 53.85, 64.1, 64.12-14, 64.16, 64.18-19, 64.24, and 64.53

Slamming and Cramming – 64.23

Credit and Deposits – 64.32-34 and 64.36

Suspension and Termination – 64.61, 64.63, 64.71-74, 64.81, 64.101, 64.102, 64.121-123, 64.133, and 64.181

Dispute Procedures – 64.2 Definition of Dispute, 64.141, 64.142, 64.153, and 64.191

Other – 63.65(4), 501(c), 1501, and Tariff

## Appendix C

### 2022 Residential Informal Complaints (Consumer Complaints and PARs) for Non-Major Utilities Not Included in Industry Chapters

Utility*	Number of Complaints	Total Number of Complaints Includes Secondary Utility Complaints**
<b>ELECTRIC</b>		
Pike County Light and Power (EDC)	11	11
Other Electric Distribution Companies (EDCs)***	3	3
4 Choice Energy (EGS)	39	44
AEP Energy (EGS)	7	9
Ambit Energy (EGS)	14	16
American Power & Gas of PA (EGS)	22	22
AP Gas and Electric d/b/a APG&E (EGS)	30	36
Atlantic Energy (EGS)	11	12
Better Buy Energy (EGS)	0	9
Cirro Energy (EGS)	9	14
Clean Choice Energy f/k/a Ethical Energy (EGS)	47	57
Cleansky Energy f/k/a Titan Gas & Power (EGS)	69	84
Clearview Electric (EGS)	20	23
Constellation Energy Power Choice (EGS)	0	7
Discount Power (EGS)	21	22
Elec-Direct Energy Services (EGS)	20	31
Eligo Energy PA (EGS)	28	34
Energy Harbor f/k/a First Energy Solutions (EGS)	49	58
Energy Plus Holdings (EGS)	8	11
Frontier Utilities Northeast (EGS)	21	25
Great American Power (EGS)	0	5
Green Mountain Energy (EGS)	20	24
Greenlight Energy (EGS)	12	16
IDT Energy (EGS)	9	10
Indra Energy (EGS)	28	34
Inspire Energy Holdings (EGS)	109	120
Interstate Gas Supply d/b/a IGS Energy (EGS)	33	35

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

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

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

## Appendix C (Continued)

### 2022 Residential Informal Complaints (Consumer Complaints and PARs) for Non-Major Utilities Not Included in Industry Chapters

Utility*	Number of Complaints	Total Number of Complaints Includes Secondary Utility Complaints**
<b>ELECTRIC (continued)</b>		
Just Energy PA (EGS)	13	17
Liberty Power (EGS)	0	5
Major Energy Services (EGS)	32	35
Mpower Energy NJ (EGS)	17	19
National Gas and Electric (EGS)	12	14
New Energy Ventured - Mid Atlantic (EGS)	5	11
New Wave Energy (EGS)	156	163
Nextera Energy Service PA (EGS)	23	26
Nordic Energy Services (EGS)	12	17
North American Power and Gas (EGS)	5	5
NRG Home (EGS)	87	106
Ntherm (EGS)	33	36
Park Power (EGS)	12	14
Pennsylvania Gas and Electric (EGS)	11	12
Planet Energy PA d/b/a Riterate or Value Plus (EGS)	61	67
Pure Energy USA (EGS)	31	39
Residents Energy (EGS)	23	27
RPA Energy d/b/a Green Choice Energy (EGS)	10	10
Rushmore Energy (EGS)	0	5
SFE Energy (EGS)	76	86
Shipley Oil (EGS)	12	13
Smartenergy.com (EGS)	108	128
South Bay Energy (EGS)	5	5
Spring Power & Gas (EGS)	7	12
Star Energy Partners (EGS)	11	11
Statewise Energy (EGS)	19	19
Stream Energy (EGS)	19	22

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

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

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

## Appendix C (Continued)

### 2022 Residential Informal Complaints (Consumer Complaints and PARs) for Non-Major Utilities Not Included in Industry Chapters

Utility*	Number of Complaints	Total Number of Complaints Includes Secondary Utility Complaints**
<b>ELECTRIC (continued)</b>		
Think Energy / Engie Retail (EGS)	9	10
Tomorrow Energy (EGS)	60	67
Town Square Energy East (EGS)	5	8
Verde Energy USA (EGS)	31	35
WGL Energy Services f/k/a WGES (EGS)	10	11
Xoom Energy PA (EGS)	6	6
Yep Energy (EGS)	7	8
Other Electric Generation Suppliers (EGSs)***	65	57
<b>Total Non-Major Electric</b>	<b>1,633</b>	<b>1,898</b>
<b>GAS</b>		
Peoples Gas Co. f/k/a Peoples TWP (NGDC)	109	113
Other Natural Gas Distribution Companies (NGDCs)***	6	6
Cleansky Energy f/k/a Titan Gas & Power (NGS)	5	5
Direct Energy Services (NGS)	0	5
Dominion Energy Solutions (NGS)	42	53
IGS (Interstate Gas Supply) (NGS)	40	50
Indra Energy (NGS)	19	21
Mpower Energy NJ (NGS)	12	14
Nordic Energy Services (NGS)	7	11
NRG Home (NGS)	15	18
Ntherm (NGS)	5	5
Pennsylvania Energy	9	12
Pennsylvania Gas and Electric (NGS)	6	6
Residents Energy (NGS)	7	7
SFE Energy (NGS)	19	20
Statewise Energy (NGS)	8	8
Tomorrow Energy (NGS)	20	20

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

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

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

## Appendix C (Continued)

### 2022 Residential Informal Complaints (Consumer Complaints and PARs) for Non-Major Utilities Not Included in Industry Chapters

Utility*	Number of Complaints	Total Number of Complaints Includes Secondary Utility Complaints**
<b>GAS</b>		
Xoom Energy PA (NGS)	6	7
Other Natural Gas Suppliers (NGSs)***	50	50
<b>Total Non-Major Gas</b>	<b>385</b>	<b>431</b>
<b>WATER</b>		
Reynolds Water (WP)	5	
Other Private Water***	8	
City of Lancaster (WM)	12	
City of Philadelphia (WM)	6	
Other Municipal Water***	3	
<b>Total Non-Major Water</b>	<b>34</b>	
<b>TELECOMMUNICATIONS</b>		
TDS Telecom (Mahanoy & Mahantango) (ILEC)	6	
Other Incumbent Local Exchange Carriers (ILECs)***	8	
Atlantic Broadband (CLEC)	6	
Frontier Communications CTSI (CLEC)	17	
Windstream Communications (CLEC)	20	
Zito Media Voice (CLEC)	11	
Other Competitive Local Exchange Carriers (CLECs)***	19	
Assurance Wireless (Virgin Mobile) (ETC)	19	
Safelink Wireless (Tracfone) (ETC)	13	
T-mobile (Inreach) (ETC)	13	
Other Providers of Telecommunications Services***	9	
<b>Total Non-Major Telecommunications</b>	<b>141</b>	

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

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

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



## Appendix C (Continued)

### 2022 Residential Informal Complaints (Consumer Complaints and PARs) for Non-Major Utilities Not Included in Industry Chapters

Utilities with Less Than Five Residential Complaints
<b>ELECTRIC</b>
<u>Other EDCs:</u> Citizens Electric Co. of Lewisburg and Wellsboro Electric
<u>Other EGSs:</u> Agway Energy Services, All American Power and Gas, Alpha Gas and Electric, Astral Energy, Brighten Energy, Choose Energy, Community Energy, Dynegy Energy Services, Ecoplus Power, Energy Co-Op, Energy Rewards/Comcast/Everyday Energy, Engie Resources, Gateway Energy, Josco Energy USA, Just Energy Solutions f/k/a Commerce, Median Energy PA, Plymouth Rock Energy, Power Up Energy, Powervine Energy, Public Power, Respond Power, Santanna Energy Services, Smart Touch Energy, Smartenergy, Spark Energy, Starion Energy of PA, Sunrise Power and Gas, Sunwave Gas and Power PA, Trieagle Energy, Viridian Energy, and Vista Energy Marketing
<b>GAS</b>
<u>Other NGDCs:</u> Herman Oil and Gas, Northeast Heat and Light, Pine-Roe Gas, and Riemer Natural Gas f/k/a Herman Riemer Gas Co.
<u>Other NGSs:</u> Alpha Gas and Electric, American Power and Gas of PA, Atlantic Energy, Constellation Energy Gas Choice f/k/a MxEnergy, Discount Power, Eligo Energy PA, Energy Harbor, Frontier Utilities Northeast, Green Mountain Energy Co., Greenlight Energy, IDT Energy, Inspire Energy Holdings, Major Energy, Median Energy, National Gas and Electric, New Wave Energy, North American Power and Gas, Park Power, Planet Energy PA d/b/a Riterate or Value Plus, Provision Power and Gas, RPA Energy d/b/a Green Choice Energy, Santanna Energy Services, Shipley Energy (Shipley Oil Service), Smartenergy Holdings, Spring Power and Gas, Verde Energy USA PA, Volunteer Energy Services, and WGL Energy Services f/k/a WGES
<b>WATER</b>
<u>Other Private Water:</u> Conneaut Lake Park, Finch Hill Water Co., Hidden Valley Utility Services, Springhouse Waterworks f/k/a Imperial Point, and Templeton Water
<u>Other Municipal Water:</u> Borough of Ambler, Borough of Schuylkill Haven, and City of Lebanon
<b>TELECOMMUNICATIONS</b>
<u>Other ILECs:</u> Armstrong Telephone Co., Consolidated Communications f/k/a North Pgh, North Penn Telephone Co., and TDS Telecom f/k/a Sugar Valley Telephone
<u>Other CLECs:</u> Armstrong Telecommunications, AT&T Local, Bandwidth.com, Clear Rate Communications, Lingo Communications f/k/a Birch Residential, RCN Telecom of PA, and Service Electric Telephone
<u>Other Providers of Telecommunications Services:</u> Airtalk Wireless f/k/a Feel Safe (Airvoice) (ETC), Entouch Wireless (Boomerang Wireless) (ETC), and Qlink Wireless (ETC)

# Appendix D-1

## Classification of Consumer Complaints

### Electric, Gas and Water

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## Appendix D-2

### Classification of Consumer Complaints Telecommunications

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

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

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

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

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

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

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

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

**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 extended area of service (limited local calling area), rates (general or specific rates are too high or the customer is being billed on the incorrect rate), and sales of non-basic service (including the availability of certain services). Also included are complaints that were taken in by BCS but closed before they could be investigated because the complainant resolved the complaint with the utility or withdrew the complaint. In addition, some complaints are non-jurisdictional.

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