



# Utility Consumer Activities Report and Evaluation

Pennsylvania Public Utility Commission





# **Utility Consumer Activities Report and Evaluation 2013**

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# 1. Consumer Contacts to the Bureau of Consumer Services

The Pennsylvania Public Utility Commission's Bureau of Consumer Services (BCS) began investigating and writing decisions on utility consumer complaints and service termination cases in April 1977. Since then, BCS has investigated 1,847,813 cases (consumer complaints and payment agreement requests (PARs)) and has received 1,540,892 opinions and requests for information (inquiries). The Public Utility Commission (PUC) received 70,334 utility customer contacts that required investigation in 2013. It is important to note that BCS determined 87 percent of the 2013 customer complaints had been appropriately handled by the subject utilities before the customers brought them to the PUC. In these instances, the PUC has upheld the utility's actions.

## Case Handling

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

Once a customer contacts the PUC with an informal complaint or PAR, BCS notifies the utility that a complaint or PAR has been filed. There were 186,724 telephone contacts to BCS by consumers in 2013, representing about 94 percent of the informal complaints filed. The utility sends BCS all records concerning the complaint, including records of its contacts with the customer regarding the complaint. A BCS investigator reviews the records, interacts with both the complainant and utility, as necessary, renders a decision and closes the case.

## Consumer Feedback Survey

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

## Consumer Rating of BCS Service

How would you rate the service you received from the PUC (BCS)?	2012	2013
Excellent	58%	56%
Good	25%	25%
Fair	9%	10%
Poor	7%	9%

According to the survey results, 81 percent of consumers who contacted BCS in 2013 rated the BCS's service as "excellent" or "good." Appendix A presents more information about how consumers rated the service they received from BCS in 2012 and 2013. BCS management frequently reviews the findings of the consumer feedback survey and promptly investigates any negative trends to improve staff performance.

### Databases

To manage and use its complaint data, BCS maintains a computer-based Consumer Services Information System (CSIS) through a contract with the Pennsylvania State University. This system enables BCS to aggregate and analyze the thousands of informal complaints that are reported to the Commission each year. In this way, BCS can address generic, as well as individual, problems. BCS policy analysts categorize complaints into one of seven major problem areas, as well as one of 36 specific problem categories. This case information is entered into the CSIS database. The analysis from case information is used by BCS to generate reports to the Commission, utilities, legislators and the public. The reports may present information regarding utility performance, industry trends, investigations, new policy issues and the impact of utility or Commission policy.

The majority of the data presented in this report is from CSIS. In addition, this report includes statistics from BCS's Collections Reporting System (CRS), Local Exchange Carrier Reporting System (LECRS) and Compliance Tracking System (CTS). Both the CRS (for electric and gas) and the LECRS (for telephone) provide valuable resources for measuring changes in company collection performance, including the number of residential service terminations, while CTS maintains data on the number and type of apparent infractions attributable to the major utilities.

### Distinctions Among Cases

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

Commercial customer contacts also were excluded from the data used in the analysis. Although BCS's regulatory authority has largely been confined to residential accounts, the Bureau handled 1,410 cases from commercial customers in 2013. Of these cases, 262 were related to loss of utility service, while 1,148 were consumer complaints.

With respect to the 262 commercial cases, BCS cannot make payment agreements for those accounts. Due to its limited jurisdiction, BCS does not issue decisions regarding commercial disputes. Instead, Bureau investigators give commercial customers information regarding the company position or attempt to mediate a mutually acceptable agreement regarding the disputed matter. 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.

All cases in 2013 that involved commercial accounts were deleted from the analyses in subsequent chapters of this report. The table below shows that the vast majority of cases handled by BCS in 2013 involved residential utility service. Appendix B presents a comparison of the number of residential and commercial consumer complaints and PARs for 2012 and 2013.

### **Total Volume of Consumer Complaints and Payment Agreement Requests (PARs) to BCS in 2013**

Industry	Consumer Complaints		Payment Agreement Requests	
	Residential	Commercial	Residential	Commercial
Electric	6,563	646	39,929	162
Gas	2,263	199	13,717	89
Water	545	44	3,896	9
Telephone	1,684	259	313	2
Other	8	0	6	0
<b>Total</b>	<b>11,063</b>	<b>1,148</b>	<b>57,861</b>	<b>262</b>

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

## Consumer Complaints

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

### Consumer Complaints by Industry\* 2012-13

Industry	2012	2013	% Change
Electric	8,520	7,209	-15%
Gas	2,733	2,462	-10%
Water	815	589	-28%
Telephone	2,757	1,943	-30%
Other	5	8	60%
<b>Total</b>	<b>14,830</b>	<b>12,211</b>	<b>-18%</b>

\* Table includes both residential and commercial consumer complaints.

During 2013, electric and gas utilities accounted for 59 percent and 20 percent, respectively, of all consumer complaints investigated by BCS. Water utilities accounted for 5 percent, while telephone utilities were the subject of 16 percent.

## Justified Consumer Complaints

Once a BCS investigator issues a decision regarding a consumer complaint, BCS policy analysts review a sampling of cases and utility records to determine if the utility took appropriate action when handling customer contacts. BCS uses these records to determine the outcome of the case. This approach focuses strictly on the regulatory aspect of the complaint and evaluates utilities negatively only where, in the judgment of BCS, the utility did not follow appropriate complaint-handling procedures or properly apply regulations. Specifically, a case is considered “justified” in the appeal to BCS if it is found that, prior to BCS intervention, the company did not comply with Commission Orders, regulations, reports, Secretarial Letters, tariffs, etc.

## Classification of Consumer Complaints

BCS has categorized the 2013 residential complaints into 13 categories for each of the electric, gas and water utilities and into 11 categories for each of the telephone utilities. The tables that show the percent of complaints in each category in 2013 appear in each industry chapter. The percentages shown in the tables are for all of the cases that residential consumers filed with BCS, not just the cases that are determined to be justified in coming to BCS. BCS analyzes the categories that generate complaints or problems for customers, even if the utility records indicate that the utility followed Commission procedures and guidelines in handling the complaint. BCS often discusses its findings with individual utilities so they can use the information to review their complaint-handling procedures in categories that seem to produce large numbers of consumer complaints to the Commission. The four tables in Appendix E show the actual number of cases in each category in 2013.

## Payment Agreement Requests

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

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

All of the measures pertaining to PARs are based on assessments of contacts to BCS from individual customers. As with consumer complaints, almost all customers had already contacted the utility prior to contacting BCS. During 2013, BCS handled 58,123 PARs from customers of the utilities under the Commission's jurisdiction.

Act 201 of 2004 amended Title 66 by adding Chapter 14, the Responsible Utility Customer Protection Act, which changed the rules for terminations, reconnections and PARs. On June 9, 2011, the Commission adopted a final rulemaking order incorporating Chapter 14 into Chapter 56. The Independent Regulatory Review Commission (IRRC) approved these regulations on July 21, 2011. The revised Chapter 56 regulations have been in effect since Oct. 8, 2011. The law sets forth limits within which the Commission can establish payment agreements between a public utility, customers and applicants. In addition to establishing the length of payment agreements, Chapter 14 prohibits the Commission from establishing a second or subsequent payment agreement, absent a change in income, if a customer has defaulted on a previous payment agreement. Chapter 14 also requires that the Commission neither negotiate nor approve payment agreements involving customer assistance program arrearages.

In 2013, the overall volume of PARs handled by the Commission increased by 10 percent from the previous year. PARs from electric and gas customers increased 10 and 18 percent, respectively, while PARs from water customers decreased 16 percent since 2012. PARs from telephone customers declined 22 percent from 2012 to 2013.

## Payment Agreement Requests (PARs) by Industry\* 2012-13

Industry	2012	2013	% Change
Electric	36,341	40,091	10%
Gas	11,663	13,806	18%
Water	4,628	3,905	-16%
Telephone	404	315	-22%
Other	6	6	0%
<b>Total</b>	<b>53,042</b>	<b>58,123</b>	<b>10%</b>

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

As in past years, the majority of requests for payment agreements in 2013 involved electric or gas companies. Sixty-nine percent of the PARs (40,091 cases) were from electric customers, and 24 percent (13,806 cases) were from gas customers. Also, 7 percent of PARs (3,905 cases) came from customers of various water utilities. Only 1 percent of PARs (315) came from telephone customers.

### Inquiries and Opinions

During 2013, BCS received 56,749 customer contacts that, for the most part, required no follow-up investigation beyond the initial contact. BCS classifies these contacts as "inquiries." The inquiries for 2013 include contacts to the BCS Utility Customer Hotline, as well as contacts to BCS using mail service and email communication.

In large part, the inquiries in 2013 involved competition issues and requests for information about competition. BCS also classifies certain PARs as inquiries. For example, BCS does not issue payment decisions on requests to restore or avoid suspension/termination of toll or non-basic telephone service. When consumers call with these problems, BCS classifies these requests as inquiries. Similarly, if a customer has recently been through the BCS payment agreement process and calls again with a new request regarding the same account, BCS does not open a new PAR case. In these instances, BCS classifies the customer's contact as an inquiry.

As in past years, BCS also has shifted some contacts that originated as consumer complaints and PARs into the inquiry category because it was not appropriate to count these contacts as informal complaints. Examples include complaints that were found to be duplicates, informal complaints filed against the wrong company, informal complaints that BCS handled in spite of the fact that customers had not previously contacted their companies about their problems and cases that the investigators verbally dismissed. These 555 cases accounted for 1 percent of inquiries in 2013.

BCS is able to expand its list of 80 reasons for contact as consumer reasons grow and change. Possible actions by BCS intake staff include: recording the consumer's opinion; giving information to the consumer; referring the consumer to a utility company; and referring the consumer to an agency or organization outside of the Commission. If the contact requires further action, the intake staff refers the contact to a BCS investigator, and the contact becomes a consumer complaint or a PAR. The following table shows the various reasons for contact for the 2013 inquiries.

### Categories of 2013 Inquiries

Reason for Contact	Number	Percent
Competition issues and requests for information	11,721	21%
CAP review – declined	11,475	20%
Termination or suspension of service	7,986	14%
Unable to open new PAR – service on	6,861	12%
PUC has no jurisdiction	3,977	7%
Request for general information	3,249	6%
Billing dispute	2,590	5%
Applicant/deposit issue	1,507	3%
People-delivered company service	1,154	2%
Service (company facilities)	321	1%
Rate protest	761	1%
Rate complaint	156	<1%
Unable to open new PAR – service off	70	<1%
Weather outage	61	<1%
Cramming*	6	<1%
Slamming*	4	<1%
Other miscellaneous reasons	3,375	6%
Reason for contact is not available	1,475	3%
<b>Total</b>	<b>56,749</b>	<b>101%</b>

\* Please refer to the glossary on pages 62-63.

### Residential Consumer Complaints Not Included in Industry Chapters

Traditionally, the primary focus of BCS's review of utilities' complaint handling has been on the performance of the major electric, gas, water and telephone utilities. However, for the past several years, BCS has included a limited amount of complaint information for the non-major utilities and the other service providers in the UCARE. In 2013, BCS experienced an increase in the overall number of residential consumer complaints for the non-major utilities. Consumer complaints increased over the year in the electric, gas and water industries. In the telephone industry, consumer complaints decreased significantly for the non-major

companies, down 51 percent from 2012. This section presents information about the residential consumer complaints that are not included in the industry chapters that follow.

In 2013, BCS staff investigated consumer complaints about a variety of problems that consumers were having with the non-major companies under the Commission's jurisdiction. The vast majority of complaints not included in the industry chapters involved billing disputes.

The next-highest volume of complaints coming from residential customers of the non-major electric, gas, water and telephone companies involved deceptive advertising or slamming. Those three types of complaints accounted for 80 percent of the residential consumer complaints about the non-major companies in the electric industry; 63 percent of residential consumer complaints about the non-major gas companies; 23 percent of the residential consumer complaints about the non-major water companies; and 40 percent of the complaints about the non-major telecommunications companies.

Appendix C presents a summary of the residential consumer complaints that are not included in the electric, gas, water and telephone chapters that follow. The table lists the non-major companies for these industries; the electric generation suppliers and natural gas suppliers; and other providers of telecommunications services having five or more residential consumer complaints in 2013.

## Calls to the Commission about Electric and Gas Competition

In 2013, the Commission's call center employees used BCS's computerized information system to record information from the consumer contacts about electric and gas competition. Statistics show that 96 percent of contacts about electric and gas competition are related to the electric industry, while 4 percent concern the gas industry.

Call center employees recorded information from 13,503 consumer contacts about competition in the energy industries. Many calls came from consumers who called about various issues associated with customer choice in the electric and gas industries. Most frequently, consumers called to request competition documents and to seek information about competition in general (48 and 13 percent of calls, respectively).

In most instances, BCS classified these contacts as inquiries because they required no investigation or follow-up. The BCS or call center staff person took care of the consumer's request or question at the initial contact. However, some consumer contacts required further investigation and possibly action to resolve the consumer's concerns. In these cases, BCS classified the contact as a consumer complaint and investigated the consumer's issue. In 2013, billing disputes related to competition produced the largest volume of competition-related consumer complaints. Appendix D-1 explains the types of competition complaints BCS handles.

In prior years, BCS investigated a number of consumer complaints in which consumers alleged they were assigned to an electric or gas supplier without their consent or knowledge (slamming). In 2013, BCS received 398 allegations of electric slamming and 22 allegations of slamming in the gas industry. There were 16 allegations of slamming in the telephone industry. With respect to slamming, the Commission has stated clearly, it "...will have zero

tolerance for slamming by any means and in any form.”<sup>1</sup> The Commission views customer slamming as among the most serious violations of consumer regulations. Of the 436 slamming complaints received by BCS, 396 were filed by residential customers.

During the early phases of electric and gas competition, BCS expected it would receive consumer complaints associated with the transition to customer choice. As expected, many customers experienced a variety of problems as they began choosing electric and gas suppliers. BCS found that, after investigating these complaints, it was often difficult to determine who was at fault in causing the complaint. Thus, BCS decided that it would be unfair to include competition complaints with consumer complaints about other issues when it calculates the performance measures it uses to evaluate and compare companies within the electric and gas industries. BCS continued this practice in 2013. Therefore, BCS excluded 1,842 competition-related complaints from the data set used to prepare the tables in the electric industry chapter and 101 such complaints in the gas industry chapter.

## Informal Compliance Process and Infractions

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

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

The significance of apparent infractions identified by the informal compliance process is frequently emphasized by the fact that some represent systemic errors that are widespread and affect many utility customers. Since BCS receives only a small portion of the

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<sup>1</sup> L-00970121, Public Meeting of May 21, 1998.

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

## 2. Performance Measures

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

### Consumer Complaint Rate

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

### Justified Consumer Complaint Rate

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

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

BCS monitors the complaint rates and justified rates of the major utilities, paying particular attention to the number of justified complaints that customers file with the Commission. Justified complaints may indicate areas where BCS should discuss complaint-

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

## Response Time to Consumer Complaints

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

## Payment Agreement Request Rate

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

## Justified Payment Agreement Request Rate

Just as with consumer complaints, once a customer contacts BCS with a PAR, BCS notifies the utility. The company sends a report to BCS that details the customer’s payments, usage and payment negotiation history. Many of these cases are “straight” PARs, without any other issue or complaint against the company. Those cases are processed in an automated fashion and are not evaluated in the justified rate. In cases where the utility claims ineligibility for a PUC payment plan, or where there are complaints or claims in addition to the PAR, a BCS investigator considers the customer’s record and makes a decision regarding the amortization of the amount owed and notifies the company and the customer of the decision. BCS policy analysts review a sampling of these case records to determine if the utility negotiated properly with the customer and uses this record to

determine the outcome of the case. This approach evaluates companies negatively only when BCS finds appropriate payment negotiation procedures were not followed, or where the regulations have been misapplied. Specifically, a case is considered “justified” in the appeal to BCS if it is found that, prior to BCS intervention, the company did not comply with Commission regulations, reports, Secretarial Letters, tariffs or guidelines.

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

## Response Time to Payment Agreement Requests

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

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

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

## Infraction Rate

During 2013, BCS continued its informal compliance notification process to improve utility compliance with applicable statutes and regulations relating to the treatment of residential accounts. In order to compare utilities of various sizes within an industry, BCS has calculated a measure called the infraction rate. The infraction rate is the number of informally verified infractions for each 1,000 residential customers.

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

The value of the infraction rate is to depict industry trends over time. The trend for 2013 is calculated using BCS's Compliance Tracking System (CTS) data as of Aug. 1, 2014. The 2013 trends may change if the total number of infractions increases or decreases upon review by BCS. This would occur if new infractions are discovered from customer complaints that originated in 2013, but were still under investigation by BCS when the data was retrieved from CTS. Often, the total number of infractions for the year will change from the number cited in this report. BCS will update the number of infractions found on 2013 cases in the report on 2014 complaint activity. Infraction rates for each major electric, gas, water and telephone utility company are shown for 2011, 2012 and 2013 in upcoming chapters. Appendix H shows detailed information about the infractions BCS gleaned from its review of the 2013 consumer complaints and PARs. The information presented in Appendix H shows the infractions of Chapter 56, Chapter 14 and other regulations for the major electric, gas and water companies, and the infractions of Chapters 63 and 64 for the major telephone companies.

## Termination Rate

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

## BCS Performance Measures and Industry Chapters

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

complaints and PARs, and the termination rates for the major electric, gas and telephone utilities.

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

BCS has found the inclusion of statistics for the smaller utilities can skew the average of industry statistics in ways that do not fairly represent industry performance. For this reason, BCS excluded the statistics involving UGI-Electric when it calculated the 2012 and 2013 averages for the electric industry. Similar to previous years, statistics for UGI-Electric are included in the appendices of this report.

## Universal Service and Energy Conservation Programs

The Commission has a long history of involvement in universal service and energy conservation programs that help utility consumers obtain and keep service, and conserve energy. At the end of the water and telephone chapters that follow, readers will find highlights of the water and telephone programs that the Commission has supported and encouraged, not only in 2013, but in prior years as well.

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

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

In Nov. 2014, the Commission released the 14th annual report on Universal Service Programs and Collections Performance. BCS prepared the report, which presents 2013 universal service and collections data for the major electric and natural gas distribution companies. The report is available on the Commission's website at:

[http://www.puc.pa.gov/General/publications\\_reports/pdf/EDC\\_NGDC\\_UniServ\\_Rpt2013.pdf](http://www.puc.pa.gov/General/publications_reports/pdf/EDC_NGDC_UniServ_Rpt2013.pdf)

## 3. Electric Industry

In 2013, the Commission had jurisdiction over 15 electric distribution companies (EDCs). However, the majority of the consumer complaints and PARs involving the electric industry were from residential customers of the seven major EDCs: Duquesne Light Co. (Duquesne); PECO Energy Co. (PECO); PPL Electric Utilities Inc. (PPL) and 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 companies. Most of the complaints and PARs dealt with matters covered under 52 Pa. Code, Chapter 56, Standards and Billing Practices for Residential Utility Service or 66 Pa. C.S.A. Chapter 14, Responsible Utility Customer Protection. Generally, consumer complaints and PARs represent customer appeals to the Commission resulting from the inability of the company and the customer to reach a mutually satisfactory resolution to a dispute or payment negotiation.

The statistics in the tables on the pages that follow depict the performance of each of the seven major electric utilities in 2013. The tables in the appendices also include UGI-Electric, a major EDC with fewer than 100,000 residential customers. PECO's statistics include data for both electric and gas service. Because their gas and/or electric customers contact the same call center and receive only one bill per billing period, PECO is unable to separate and report data by gas and electric service. BCS investigated complaints in 2013, generated as a result of the electric choice program, which allows customers to choose an electric generation supply company. However, as mentioned in the first chapter, BCS removed these complaints from the data it used to prepare the tables on consumer complaints and PARs. Appendices F and G present statistics on the performance of the seven largest EDCs, as well as UGI-Electric, in 2012 and 2013.

### Consumer Complaints

During 2013, BCS handled 4,956 consumer complaints from residential customers of the various EDCs and 1,607 consumer complaints from residential customers of electric generation supply companies. Of these residential complaints, 74 percent (4,889) were from customers of the seven largest EDCs. For the analyses in this chapter, BCS excluded a total of 175 consumer complaints about the major EDCs that involved competition issues.

### Consumer Complaint Categories

The following table shows the percentage of 2013 complaints from residential customers of the seven largest EDCs, in each of the 13 categories used by BCS policy analysts. Appendix E, Table 1, provides the actual number of cases that fell into each category in 2013.

## Consumer Complaint Categories: 2013 Major Electric Distribution Companies

Categories	Duquesne	Met-Ed	PECO+**	Penelec	Penn Power	PPL**	West Penn	Electric Majors
Billing Disputes	16%	17%	28%	17%	23%	31%	12%	19%
Metering	2%	23%	5%	20%	13%	10%	20%	14%
Personnel Problems	19%	14%	11%	13%	10%	9%	10%	12%
Discontinuance/ Transfer	8%	9%	11%	8%	10%	13%	5%	9%
Credit and Deposits	8%	7%	12%	7%	11%	6%	3%	7%
Service Interruptions	7%	5%	1%	4%	2%	2%	11%	5%
Damages	2%	4%	3%	4%	6%	2%	10%	5%
Service Extensions	2%	3%	1%	2%	1%	1%	10%	3%
Service Quality	3%	3%	4%	3%	2%	3%	5%	3%
Other Payment Issues	6%	1%	4%	2%	2%	2%	3%	3%
Scheduling Delays	1%	2%	1%	3%	1%	3%	4%	2%
Rates	<1%	1%	0%	<1%	0%	1%	<1%	<1%
All Other Problems	28%	10%	19%	17%	18%	17%	8%	16%
<b>Total-Number*</b>	<b>395</b>	<b>606</b>	<b>483</b>	<b>457</b>	<b>97</b>	<b>447</b>	<b>661</b>	<b>3,146</b>

\* Based on residential complaints evaluated by BCS as of Aug. 1, 2014.

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

+ PECO statistics include electric and gas.

- Categories are for all residential complaints filed with BCS, whether or not they were found to be justified. See Appendix D-1 for an explanation of complaint categories and Appendix E, Table 1, for the number of cases in each category.
- In 2013, billing disputes accounted for 19 percent of the consumer complaints for the major EDCs. Metering disputes accounted for 14 percent of the consumer complaints, and personnel problems accounted for 12 percent of the consumer complaints. These three categories accounted for 45 percent of consumer complaints about the major EDCs.

## 2013 Residential Consumer Complaint Rates/ Justified Consumer Complaint Rates Major Electric Distribution Companies

Company	Consumer Complaint Rate	Justified Consumer Complaint Rate
Duquesne	0.96	0.10
Met-Ed	1.68	0.35
PECO+	0.85	0.15*
Penelec	1.17	0.20
Penn Power	0.72	0.11
PPL	0.58	0.06*
West Penn	1.54	0.30
<b>Average</b>	<b>1.07</b>	<b>0.18</b>

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

+ PECO statistics include electric and gas.

- The consumer complaint rate equals the number of consumer complaints for each 1,000 residential customers. The justified consumer complaint rate equals the number of justified consumer complaints for each 1,000 residential customers.
- For the major EDCs, the average of the consumer complaint rates is nearly six times greater than the average of the justified consumer complaint rates.
- Appendix F, Table 1, presents the number of consumer complaints, the consumer complaint rate, the number of justified consumer complaints and the justified consumer complaint rate for each major EDC in 2012 and 2013.

## 2012-13 Justified Residential Consumer Complaint Rates Major Electric Distribution Companies

Company	2012	2013
Duquesne	0.16	0.10
Met-Ed	0.34	0.35
PECO*+	0.15	0.15
Penelec	0.12	0.20
Penn Power	0.14	0.11
PPL*	0.10	0.06
West Penn	0.30	0.30
<b>Average</b>	<b>0.19</b>	<b>0.18</b>

\* Based on a probability sample of cases.

+ PECO statistics include electric and gas.

- The justified consumer complaint rate equals the number of justified consumer complaints for each 1,000 residential customers.
- The average of the justified consumer complaint rates for the major electric distribution companies decreased slightly from 0.19 in 2012 to 0.18 in 2013.
- Of the seven major EDCs, three have justified consumer complaint rates that are higher than the industry average. Met-Ed's justified consumer complaint rate, at 0.35, is nearly double the industry average.
- Appendix F, Table 1, presents the number of consumer complaints, the consumer complaint rate, the number of justified consumer complaints and the justified consumer complaint rate for each major EDC in 2012 and 2013.

**2012-13 Response Time to BCS  
Residential Consumer Complaints  
Major Electric Distribution Companies**

<b>Company</b>	<b>Number of Days 2012</b>	<b>Number of Days 2013</b>	<b>Change in Days 2012 to 2013</b>
Duquesne	19.5	3.9	-15.6
Met-Ed	15.3	17.2	1.9
PECO+	7.6	8.8	1.2
Penelec	15.4	15.4	0.0
Penn Power	13.2	15.4	2.2
PPL	18.4	19.1	0.7
West Penn	17.4	16.3	-1.1
<b>Average</b>	<b>15.3</b>	<b>13.7</b>	<b>-1.6</b>

+ PECO statistics include electric and gas.

- The calculation for average response time includes all residential consumer complaints for the major electric companies.
- Overall, the average response time decreased from 15.3 days in 2012 to 13.7 days in 2013.
- Duquesne had the shortest consumer complaint response time in 2013 at 3.9 days, while PPL had the longest at 19.1 days. Duquesne's consumer complaint response time decreased by 15.6 days from 2012 to 2013.

## Payment Agreement Requests

In 2013, BCS handled 39,871 PARs from residential customers of the EDCs. There were 58 PARs from residential customers of Pennsylvania's electric generation supply companies. Ninety-eight percent (39,164) of the residential PARs were from customers of the seven largest EDCs. In 2013, BCS reviewed a representative sample of the PARs for six of the seven largest EDCs: Duquesne, Met-Ed, PECO, Penelec, PPL and West Penn. Thus, the calculation for justified PAR rate that appears in the pages that follow is based on a subset of cases that BCS received from the customers of these utilities. BCS believes that the size of the samples gives a reasonable indication of the performance of these companies. Appendix G, Table 1, provides additional statistics regarding the PARs from residential customers of the major EDCs.

**2013 Residential Payment Agreement Request (PAR) Rates/  
Justified PAR Rates\*  
Major Electric Distribution Companies**

Company	PAR Rate	Justified PAR Rate
Duquesne	9.49	0.31
Met-Ed	5.34	0.37
PECO+	5.17	0.10
Penelec	4.87	0.26
Penn Power	4.68	0.13
PPL	15.84	0.67
West Penn	2.76	0.15
<b>Average</b>	<b>6.88</b>	<b>0.28</b>

\* All companies, with the exception of Penn Power, have justified PAR rates based on a probability sample of cases.

+ PECO statistics include electric and gas.

- The PAR rate equals the number of PARs for each 1,000 residential customers. The justified PAR rate equals the number of justified PARs for each 1,000 residential customers.
- On average, there were nearly seven PARs to BCS for each 1,000 residential customers of the major EDCs in 2013. There was less than one justified PAR for each 1,000 residential customers.
- The implementation of Chapter 14 had an impact on the 2013 PAR rates and justified PAR rates.
- Appendix G, Table 1, presents the number of PARs, the PAR rate, the number of justified PARs and the justified PAR rate for each major EDC in 2012 and 2013.

**2012-13 Justified Residential  
Payment Agreement Request (PAR) Rates\*  
Major Electric Distribution Companies**

Company	2012	2013
Duquesne	0.13	0.31
Met-Ed	0.11	0.37
PECO+	0.05	0.10
Penelec	0.08	0.26
Penn Power	0.09	0.13
PPL	0.45	0.67
West Penn	0.08	0.15
<b>Average</b>	<b>0.14</b>	<b>0.28</b>

\* All companies, with the exception of Penn Power, have justified PAR rates based on a probability sample of cases.

+ PECO statistics include electric and gas.

- The justified PAR rate equals the number of justified PARs for each 1,000 residential customers.
- The average of the justified PAR rates for the seven major EDCs doubled from 0.14 in 2012 to 0.28 in 2013.
- The justified PAR rates increased for each of the seven major EDCs from 2012 to 2013. Three of the major EDCs have justified PAR rates greater than the 2013 industry average while four of the major EDCs have justified PAR rates below the industry average.
- The implementation of Chapter 14 had an impact on the 2012 and 2013 justified PAR rates.
- Appendix G, Table 1, presents the number of PARs, the PAR rate, the number of justified PARs and the justified PAR rate for each major EDC in 2012 and 2013.

**2012-13 Response Time to BCS  
Residential Payment Agreement Requests (PARs)  
Major Electric Distribution Companies**

<b>Company</b>	<b>Number of Days 2012</b>	<b>Number of Days 2013</b>	<b>Change in Days 2012 to 2013</b>
Duquesne	12.6	1.3	-11.3
Met-Ed	9.5	8.3	-1.2
PECO+	3.2	3.3	0.1
Penelec	9.5	8.1	-1.4
Penn Power	9.0	7.5	-1.5
PPL	9.5	13.1	3.6
West Penn	8.4	7.1	-1.3
<b>Average</b>	<b>8.8</b>	<b>7.0</b>	<b>-1.8</b>

+ PECO statistics include electric and gas.

- The calculation for average response time includes all residential PARs for the major electric companies.
- The average response time for the seven major EDCs decreased nearly two days. The average response time went from 8.8 days in 2012 to 7.0 days in 2013.
- There is a wide range of PAR response times among the major EDCs for 2013, from a low of 1.3 days for Duquesne to a high of 13.1 days for PPL.

## Termination and Reconnection of Service

Each month, the electric companies report to the Commission the number of residential accounts that they terminated for non-payment during the previous month. They also report the number of previously terminated residential accounts that they reconnected during the month. Some EDCs maintain a fairly consistent pattern of termination behavior, while others fluctuate from year to year. The number of reconnections varies from year to year and from company to company, depending on a variety of factors. The EDC reconnects a customer's terminated service when a customer either pays his/her debt in full or makes a significant payment on the debt and agrees to a payment agreement for the balance owed to the company. The following tables indicate the annual number of residential accounts each of the seven largest EDCs terminated and reconnected in 2011, 2012 and 2013. The first table also presents the termination rates for each of these companies.

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

Company	Residential Service Terminations				Termination Rates		
	2011	2012	2013	% Change 2012-13	2011	2012	2013
Duquesne	22,927	23,533	25,649	9%	4.37	4.48	4.87
Met-Ed	18,169	17,995	23,672	32%	3.73	3.69	4.85
PECO+	81,408	73,887	84,235	14%	5.71	5.16	5.87
Penelec	17,513	13,747	20,544	49%	3.46	2.72	4.07
Penn Power	3,622	3,514	4,999	42%	2.58	2.50	3.54
PPL	33,641	38,303	47,759	25%	2.77	3.15	3.92
West Penn	15,351	11,092	13,904	25%	2.49	1.79	2.24
<b>Major Electric</b>	<b>192,631</b>	<b>182,071</b>	<b>220,762</b>	<b>21%</b>			
<b>Average of Rates</b>					<b>3.59</b>	<b>3.36</b>	<b>4.19</b>

+ PECO statistics include electric and gas.

- The termination rate is the number of service terminations divided by the number of residential customers, expressed as a percent.
- Overall, the seven major EDCs terminated 21 percent more residential accounts in 2013 than in 2012.

## Residential Service Reconnections Major Electric Distribution Companies

Company	2011	2012	2013	% Change 2012-13
Duquesne	16,846	18,179	20,355	12%
Met-Ed	14,696	14,651	19,046	30%
PECO+	58,323	52,512	61,858	18%
Penelec	14,209	10,989	16,184	47%
Penn Power	3,316	3,208	4,740	48%
PPL	22,727	26,326	34,910	33%
West Penn	9,914	9,082	11,089	22%
<b>Major Electric</b>	<b>140,031</b>	<b>134,947</b>	<b>168,182</b>	<b>25%</b>

+ PECO statistics include electric and gas.

- Overall, the seven major EDCs reconnected 25 percent more residential accounts in 2013 than in 2012.

### Compliance

BCS provides utilities with written clarifications or explanations of Chapter 56 provisions and other Commission regulations and policies. The use of “infraction rate” is intended to help the Commission monitor the duty of electric companies at 66 Pa. C.S. §2807(d) to, at a minimum, maintain customer services under retail competition at the same level of quality as existed prior to the beginning of the Electricity Generation Customer Choice and Competition Act of 1996.

The infraction rates in the table that follows are based on all informal complaints that residential consumers filed with BCS from 2011 through 2013. Infractions identified on complaints involving competition issues are included in the infraction statistics. Appendix H, Table 1, presents detailed information about the infractions identified in 2013 cases to the BCS.

## Commission Infraction Rates Major Electric Distribution Companies

Company	2011	2012	2013
Duquesne	0.11	0.10	0.04
Met-Ed	0.08	0.23	0.27
PECO+	0.04	0.03	0.05
Penelec	0.07	0.07	0.12
Penn Power	0.06	0.06	0.06
PPL	0.02	0.05	0.03
West Penn	0.07	0.10	0.22

+ PECO statistics include electric and gas.

- The infraction rate is the number of informally verified infractions per 1,000 residential customers.
- The infraction rates from 2012 to 2013 for Met-Ed, PECO, Penelec and West Penn increased, while the rates for Duquesne and PPL decreased. The rate remained stable for Penn Power.
- Appendix H, Table 1, presents the actual number of infractions for 2013 categorized by infraction category.
- As shown in Appendix H, Table 1, the meter reading and dispute handling categories are noteworthy due to both high volume and high percentage of the total number of infractions.

## 4. Natural Gas Industry

In 2013, the Commission had jurisdiction over 30 natural gas distribution companies (NGDCs). However, the majority of the consumer complaints and PARs involving the gas industry came from residential customers of the seven major NGDCs: Columbia Gas of Pennsylvania Inc. (Columbia); Equitable Gas Co. (Equitable); National Fuel Gas Distribution Corp. (NFG); Peoples Natural Gas Co. (Peoples); Philadelphia Gas Works (PGW); UGI Utilities Inc.-Gas; and UGI Penn Natural Gas. This chapter will focus exclusively on those seven utilities. As with the electric industry, most of the complaints and PARs dealt with matters covered under 52 Pa. Code, Chapter 56, Standards and Billing Practices for Residential Utility Service or 66 Pa. C.S.A. Chapter 14, Responsible Utility Customer Protection. Generally, those consumer complaints and PARs represent customer appeals to the Commission resulting from the inability of the company and the customer to reach a mutually satisfactory resolution to a dispute or payment negotiation.

The statistics in the tables on the pages that follow depict the performance of each of the seven major gas utilities in 2013. Appendices F and G provide statistics for these utilities from 2012 and 2013.

### Consumer Complaints

During 2013, BCS handled 2,165 consumer complaints from residential customers of the various NGDCs and 98 consumer complaints from residential customers of natural gas suppliers (NGSs). Of these residential complaints, 92 percent (2,087) were from customers of the seven largest NGDCs. For the analyses of the seven major gas companies that appear in this chapter, BCS excluded 10 consumer complaints that involved competition issues.

### Consumer Complaint Categories

The following table shows the percentage of 2013 complaints from residential customers of the seven major gas utilities in each of the 13 categories, used by BCS policy analysts to categorize consumer complaints about electric, gas and water utilities. Appendix E, Table 2, provides the actual number of cases that fell into each category in 2013.

## Consumer Complaint Categories: 2013 Major Natural Gas Distribution Companies

Categories	Columbia	Equitable	NFG	Peoples	PGW**	UGI-Gas	UGI Penn Natural	Gas Majors
Billing Disputes	10%	17%	14%	24%	15%	22%	18%	17%
Personnel Problems	29%	31%	16%	14%	9%	17%	7%	16%
Discontinuance/Transfer	3%	12%	14%	6%	21%	9%	12%	13%
Metering	5%	1%	11%	13%	14%	0%	1%	9%
Damages	12%	5%	2%	12%	2%	10%	1%	6%
Other Payment Issues	1%	1%	3%	4%	11%	1%	2%	6%
Scheduling Delays	8%	3%	5%	4%	5%	5%	4%	5%
Credit and Deposits	1%	4%	0%	3%	1%	15%	22%	5%
Service Quality	8%	4%	5%	6%	1%	5%	5%	4%
Service Extensions	6%	1%	7%	4%	1%	9%	8%	4%
Service Interruptions	1%	1%	1%	1%	1%	0%	0%	1%
Rates	2%	1%	0%	1%	0%	0%	0%	<1%
All Other Problems	13%	22%	20%	6%	18%	9%	19%	15%
<b>Total-Number*</b>	<b>154</b>	<b>111</b>	<b>91</b>	<b>202</b>	<b>486</b>	<b>129</b>	<b>83</b>	<b>1,256</b>

\* Based on residential complaints evaluated by BCS as of Aug. 1, 2014.

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

- Categories are for all residential complaints filed with BCS, whether or not they were found to be justified. See Appendix D-1 for an explanation of complaint categories and Appendix E, Table 2, for the number of cases in each category.
- In 2013, billing disputes generated 17 percent of the complaints about the major gas companies followed by personnel problems (16 percent). Complaints about discontinuing/transferring service accounted for 13 percent of residential consumer complaints about the major gas companies.

**2013 Residential Consumer Complaint Rates/  
Justified Consumer Complaint Rates  
Major Natural Gas Distribution Companies**

<b>Company</b>	<b>Consumer Complaint Rate</b>	<b>Justified Consumer Complaint Rate</b>
Columbia	0.47	0.03
Equitable	0.58	0.03
NFG	0.46	0.08
Peoples	0.74	0.15
PGW	2.51	0.71*
UGI-Gas	0.51	0.03
UGI Penn Natural	0.58	0.05
<b>Average</b>	<b>0.84</b>	<b>0.16</b>

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

- The consumer complaint rate equals the number of consumer complaints for each 1,000 residential customers. The justified consumer complaint rate equals the number of justified consumer complaints for each 1,000 residential customers.
- In 2013, the average of the consumer complaint rates is more than five times the average of the justified consumer complaint rates for the seven major gas companies.
- Appendix F, Table 2, presents the number of consumer complaints, the consumer complaint rate, the number of justified consumer complaints and the justified consumer complaint rate for each major gas company in 2012 and 2013.

**2012-13 Justified Residential  
Consumer Complaint Rates  
Major Natural Gas Distribution Companies**

Company	2012	2013
Columbia	0.05	0.03
Equitable	0.04	0.03
NFG	0.07	0.08
Peoples	0.19	0.15
PGW*	0.68	0.71
UGI-Gas	0.05	0.03
UGI Penn Natural	0.09	0.05
<b>Average</b>	<b>0.17</b>	<b>0.16</b>

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

- The justified consumer complaint rate equals the number of justified consumer complaints for each 1,000 residential customers.
- In 2013, five of the major gas companies had justified consumer complaint rates lower than their justified consumer complaint rates in 2012. Only NFG and PGW had justified consumer complaint rates that increased since 2012.
- The average of the justified consumer complaint rates for the major gas companies decreased slightly from 0.17 in 2012 to 0.16 in 2013. Only PGW had a justified consumer complaint rate that is higher than the 2012 industry average.
- Appendix F, Table 2, presents the number of consumer complaints, the consumer complaint rate, the number of justified consumer complaints and the justified consumer complaint rate for each major gas company in 2012 and 2013.

**2012-13 Response Time to BCS  
Residential Consumer Complaints  
Major Natural Gas Distribution Companies**

<b>Company</b>	<b>Number of Days 2012</b>	<b>Number of Days 2013</b>	<b>Change in Days 2012 to 2013</b>
Columbia	5.5	5.3	-0.2
Equitable	3.0	2.4	-0.6
NFG	5.2	11.0	5.8
Peoples	8.4	1.9	-6.5
PGW	20.4	18.5	-1.9
UGI-Gas	5.5	13.6	8.1
UGI Penn Natural	6.2	12.7	6.5
<b>Average</b>	<b>7.7</b>	<b>9.3</b>	<b>1.6</b>

- The calculation for average response time includes all residential consumer complaints for the major gas companies.
- The average response time for the major gas companies increased from 7.7 days in 2012 to 9.3 days in 2013.
- Consumer complaint response time performance varied among the major gas companies in 2013, from a low of 1.9 days for Peoples to a high of 18.5 days for PGW.

### Payment Agreement Requests

In 2013, BCS handled 13,712 PARs from residential customers of the natural gas distribution companies (NGDCs). There were five PARs from residential customers of Pennsylvania's natural gas supply companies. Ninety-seven percent (13,281) of the residential PARs were from customers of the seven major natural gas distribution companies. In 2013, BCS reviewed a representative sample of the PARs for case outcome for all the major gas companies except Columbia and Peoples. Thus, the calculation for justified PAR rate that appears in the pages that follow is based on a subset of cases that BCS received from customers of these utilities. BCS believes that the size of the samples gives an adequate indication of the performance of these companies. Appendix G, Table 2, provides additional statistics regarding the PARs from residential customers of the major NGDCs.

**2013 Residential Payment Agreement Request (PAR) Rates/  
Justified PAR Rates\*  
Major Natural Gas Distribution Companies**

<b>Company</b>	<b>PAR Rate</b>	<b>Justified PAR Rate</b>
Columbia	2.68	0.02
Equitable	5.97	0.10
NFG	4.06	0.13
Peoples	1.85	0.08
PGW	11.17	0.37
UGI-Gas	7.87	0.48
UGI Penn Natural	10.69	0.74
<b>Average</b>	<b>6.33</b>	<b>0.28</b>

\* All companies, with the exception of Columbia and Peoples, have justified PAR rates based on a probability sample of cases.

- The PAR rate equals the number of PARs for each 1,000 residential customers. The justified PAR rate equals the number of justified PARs for each 1,000 residential customers.
- On average, there were more than six PARs to BCS for each 1,000 residential customers of the major NGDCs in 2013. There was less than one justified PAR for each 1,000 residential customers.
- The implementation of Chapter 14 had an impact on the 2013 PAR rates and justified PAR rates.
- Appendix G, Table 2, presents the number of PARs, the PAR rate, the number of justified PARs and the justified PAR rate for each major gas company in 2012 and 2013.

## 2012-13 Justified Residential Payment Agreement Request (PAR) Rates\* Major Natural Gas Distribution Companies

Company	2012	2013
Columbia	0.03	0.02
Equitable	0.06	0.10
NFG	0.02	0.13
Peoples	0.11	0.08
PGW	0.15	0.37
UGI-Gas	0.44	0.48
UGI Penn Natural	0.65	0.74
<b>Average</b>	<b>0.21</b>	<b>0.28</b>

\* All companies, with the exception of Columbia and Peoples, have justified PAR rates based on a probability sample of cases.

- The justified PAR rate equals the number of justified PARs for each 1,000 residential customers.
- The average of the justified PAR rates for the seven major gas utilities increased slightly from 0.21 in 2012 to 0.28 in 2013. Five of the seven major gas companies had increases in their justified PAR rates.
- The 2013 justified PAR rates among the major NGDCs ranged from a low of 0.02 for Columbia to a high of 0.74 for UGI Penn Natural.
- The implementation of Chapter 14 had an impact on the 2012 and 2013 justified PAR rates.
- Appendix G, Table 2, presents the number of PARs, the PAR rate, the number of justified PARs and the justified PAR rate for each major gas company in 2012 and 2013.

**2012-13 Response Time to BCS  
Residential Payment Agreement Requests (PARs)  
Major Natural Gas Distribution Companies**

<b>Company</b>	<b>Number of Days 2012</b>	<b>Number of Days 2013</b>	<b>Change in Days 2012 to 2013</b>
Columbia	2.7	2.5	-0.2
Equitable	1.0	0.9	-0.1
NFG	2.6	5.4	2.8
Peoples	4.9	1.4	-3.5
PGW	12.1	11.5	-0.6
UGI-Gas	2.2	5.2	3.0
UGI Penn Natural	1.9	5.7	3.8
<b>Average</b>	<b>3.9</b>	<b>4.7</b>	<b>0.8</b>

- The calculation for average response time includes all residential PARs for the major gas companies.
- From 2012 to 2013, the average response time for the major gas companies increased by 0.8 day.
- The 2013 PAR response times for the major NGDCs varied from a low of 0.9 day for Equitable to a high of 11.5 days for PGW.

### Termination and Reconnection of Service

Each month, the gas utilities report to the Commission the number of residential accounts that they terminated for nonpayment during the previous month. They also report the number of previously terminated residential accounts that they reconnected during the month. Historically, utilities have shown a varied pattern of termination behavior, from a consistent pattern to one that fluctuates from year to year. The number of reconnections varies from year to year and from company to company, depending on a variety of factors. The NGDC reconnects a customer's terminated service either when a customer pays his/her debt in full or makes a significant payment on the debt and agrees to a payment agreement for the balance owed to the company. The tables that follow indicate the annual number of residential accounts each of the seven largest gas utilities terminated and reconnected in 2011, 2012 and 2013. The first table also presents the termination rates for each of these companies.

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

Company	Residential Service Terminations				Termination Rates		
	2011	2012	2013	% Change 2012-13	2011	2012	2013
Columbia	9,650	11,321	12,030	6%	2.58	2.96	3.13
Equitable	10,471	8,394	8,507	1%	4.36	3.47	3.51
NFG	9,472	8,347	9,576	15%	4.77	4.20	4.82
Peoples	3,696	6,601	7,229	10%	1.12	2.00	2.19
PGW	28,868	25,507	28,497	12%	6.02	5.32	6.08
UGI-Gas	11,206	8,434	9,055	7%	3.61	2.66	2.79
UGI Penn Natural	6,967	5,403	6,214	15%	4.79	3.67	4.17
<b>Major Gas</b>	<b>80,330</b>	<b>74,007</b>	<b>81,108</b>	<b>10%</b>			
<b>Average of Rates</b>					<b>3.89</b>	<b>3.47</b>	<b>3.81</b>

- The termination rate is the number of service terminations divided by the number of residential customers, expressed as a percent.
- Overall, the seven major gas companies terminated 10 percent more residential accounts in 2013 than in 2012.

## Residential Service Reconnections Major Natural Gas Distribution Companies

Company	2011	2012	2013	% Change 2012-13
Columbia	4,958	6,310	6,490	3%
Equitable	7,587	6,221	6,453	4%
NFG	6,449	5,458	6,453	18%
Peoples	2,660	4,654	5,426	17%
PGW*	26,011	18,114	19,907	10%
UGI-Gas	5,426	3,990	4,332	9%
UGI Penn Natural	4,276	3,453	3,483	1%
<b>Major Gas</b>	<b>57,367</b>	<b>48,200</b>	<b>52,544</b>	<b>9%</b>

\* Prior to 2012, PGW's reconnections were overstated as a result of the company's reporting methodology not validating whether each completed turn-on was associated with the previously terminated customer.

- Overall, the seven major NGDCs reconnected 9 percent more residential accounts in 2013 than in 2012.

## Compliance

BCS provides utilities with written clarifications or explanations of Chapter 56 provisions and other Commission regulations and policies. The use of “infraction rate” is intended to help the Commission monitor the duty of natural gas companies at 66 Pa. C.S. §2206(a) to, at a minimum, maintain customer services under retail competition at the same level of quality as existed prior to the beginning of the Natural Gas Choice and Competition Act of 1999.

The infraction rates in the table that follows are based on the review of all informal complaints that residential consumers filed with BCS from 2011 through 2013. Infractions identified on complaints involving competition issues are included in the infraction statistics. Appendix H, Table 2, presents detailed information about the infractions identified on 2013 cases to the BCS.

### Commission Infraction Rates Major Natural Gas Distribution Companies

Company	2011	2012	2013
Columbia	0.04	0.02	0.01
Equitable	0.03	0.02	0.02
NFG	0.02	0.03	0.03
Peoples	0.18	0.20	0.15
PGW	0.16	0.28	0.43
UGI-Gas	0.03	0.03	0.01
UGI Penn Natural	0.08	0.04	0.03

- The infraction rate is the number of informally verified infractions per 1,000 residential customers.
- From 2012 to 2013, infraction rates decreased for Columbia, Peoples, UGI-Gas and UGI Penn Natural, while the infraction rate increased for PGW. The rates for Equitable and NFG remained stable.
- Appendix H, Table 2, presents the actual number of infractions for 2013 categorized by infraction category.
- As shown in Appendix H, Table 2, the dispute handling category is noteworthy due to both high volume and high percentage of the total number of infractions.

## 5. Water Industry

In 2013, the Commission had jurisdiction over 88 water companies, including 22 municipal water companies. The Commission categorizes the non-municipal water companies into one of three classifications: A, B and C. Those three classifications are based on the amount of the company's annual revenues.

The non-municipal water companies with the largest annual revenues are classified as "Class A" water companies. "Class A" water companies must have annual revenues of \$1 million or more for three years in a row. In 2013, nine "Class A" water companies served residential customers. The number of residential customers for these major companies ranged from 2,367 for United Water Bethel to 591,405 residential customers for Pennsylvania American Water Co. (PAWC). In 2013, the "Class A" water companies were Aqua Pennsylvania Inc. (Aqua), Audubon Water Co., Columbia Water Co., Newtown Artesian Water Co., Pennsylvania American Water Co., Superior Water Co., United Water Bethel, United Water of Pennsylvania Inc. and York Water Co. The tables in this chapter present individual statistics for the two largest water companies, PAWC and Aqua, and for the "Other Class A" companies as a whole.

The other classes of water companies have lower annual revenues and, typically, fewer residential customers. In 2013, nine "Class B" companies were operating. "Class B" water companies have annual revenues between \$200,000 and \$999,999. In 2013, the number of residential customers for the "Class B" companies ranged from 287 to 1,616. There were 47 "Class C" companies in 2013. "Class C" water companies have annual revenues of less than \$200,000. The number of residential customers for the "Class C" companies ranged from two to 1,150 in 2013.

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

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

The tables on the pages that follow depict the performance of the "Class A" water companies in 2013. Appendices F and G also present statistics about the performance of the "Class A" water companies.

## Consumer Complaints

During 2013, BCS handled a total of 545 consumer complaints from residential customers of the various water companies. Of those complaints, 94 percent (515) were from customers of the “Class A” companies. The remaining 6 percent were from customers of smaller water companies. While a majority of consumer complaints involved the “Class A” water companies in 2013, the Commission devoted a significant amount of attention to the smaller water companies. Sometimes the amount of time BCS spends on a few complaints from customers of a smaller company exceeds the amount of time it spends dealing with complaints filed against one of the larger companies. This is because larger companies typically have the resources to respond appropriately to complaints and PARs as compared to smaller water companies with limited resources.

In 2013, customers of the small water companies filed complaints with BCS for a variety of reasons. Of the 30 consumer complaints filed about the “Non-Class A” water companies, slightly more than a third (11 cases) involved disputes about service termination/payment agreements to avoid termination.

## Consumer Complaint Categories

The following table shows the percentage of 2013 complaints from residential customers of the “Class A” water companies in each of the categories used by BCS policy analysts to categorize consumer complaints about electric, gas and water companies. Appendix E, Table 3, provides the actual number of cases that fell into each category in 2013.

## Consumer Complaint Categories: 2013 Major Water Companies

Categories	Aqua	PAWC	"Other Class A"	All "Class A" Water
Billing Disputes	46%	46%	33%	45%
Service Quality	6%	10%	23%	10%
Personnel Problems	9%	7%	3%	8%
Damages	3%	5%	10%	5%
Scheduling Delays	3%	4%	3%	4%
Metering	4%	3%	10%	4%
Service Extensions	2%	3%	3%	3%
Discontinuance/Transfer	2%	3%	0%	2%
Other Payment Issues	2%	1%	3%	2%
Service Interruptions	2%	1%	0%	1%
Credit and Deposits	2%	<1%	0%	1%
Rates	1%	0%	0%	<1%
All Other Problems	18%	16%	10%	16%
<b>Total-Number*</b>	<b>170</b>	<b>302</b>	<b>30</b>	<b>502</b>

\* Based on residential complaints evaluated by BCS as of Aug. 1, 2014.

- Categories are for all residential complaints filed with BCS, whether or not they were found to be justified. See Appendix D-1 for an explanation of complaint categories and Appendix E, Table 3, for the number of cases in each category.
- Forty-five percent of residential complaints filed against the "Class A" water companies involved billing disputes.

## 2013 Residential Consumer Complaint Rates/ Justified Consumer Complaint Rates Major Water Companies

Company	Consumer Complaint Rate	Justified Consumer Complaint Rate
Aqua	0.45	0.20
PAWC	0.52	0.18
"Other Class A"	0.23	0.04
<b>Average</b>	<b>0.40</b>	<b>0.14</b>

- The consumer complaint rate equals the number of consumer complaints for each 1,000 residential customers. The justified consumer complaint rate equals the number of justified consumer complaints for each 1,000 residential customers.
- The consumer complaint rate for PAWC is nearly three times greater than its justified consumer complaint rate.
- Appendix F, Table 3, presents the number of consumer complaints, the consumer complaint rate, the number of justified consumer complaints and the justified consumer complaint rate for Aqua, PAWC and the "Other Class A" water companies in 2012 and 2013.

## 2012-13 Justified Residential Consumer Complaint Rates Major Water Companies

Company	2012	2013
Aqua	0.21	0.20
PAWC	0.14	0.18
"Other Class A"	0.01	0.04
<b>Average</b>	<b>0.12</b>	<b>0.14</b>

- The justified consumer complaint rate equals the number of justified consumer complaints for each 1,000 residential customers.
- The justified consumer complaint rate decreased for Aqua, but increased for PAWC between 2012 and 2013.
- Appendix F, Table 3, presents the number of consumer complaints, the consumer complaint rate, the number of justified consumer complaints and the justified consumer complaint rate for Aqua, PAWC and the "Other Class A" water companies in 2012 and 2013.

**2012-13 Response Time to BCS  
Residential Consumer Complaints  
Major Water Companies**

<b>Company</b>	<b>Number of Days 2012</b>	<b>Number of Days 2013</b>	<b>Change in Days 2012 to 2013</b>
Aqua	7.1	8.7	1.6
PAWC	6.7	4.5	-2.2
"Other Class A"	6.2	11.5	5.3
<b>Average</b>	<b>6.7</b>	<b>8.2</b>	<b>1.5</b>

- The calculation for average response time includes all residential consumer complaints for the major water companies.
- The average response time for Aqua increased by 1.6 days from 2012 to 2013. The average response time for PAWC decreased 2.2 days, from 6.7 days in 2012 to 4.5 days in 2013.

### Payment Agreement Requests

In 2013, BCS handled 3,896 PARs from residential customers of the water industry. Ninety-nine percent (3,856) of the residential PARs were from customers of the "Class A" water companies. As in past years, for the companies with the largest volume of requests, BCS policy analysts reviewed a representative sample of PARs for case outcome. In 2013, BCS reviewed a sample of the PARs for Aqua and PAWC. Thus, the calculation for justified PAR rate that appears in the pages that follow is based on a subset of cases that BCS received from customers of these two companies. BCS believes the size of the sample gives a reasonable indication of the performance of these companies. Appendix G, Table 3, provides additional statistics regarding the PARs from residential customers of the "Class A" water companies.

## 2013 Residential Payment Agreement Request (PAR) Rates/ Justified PAR Rates Major Water Companies

Company	PAR Rate	Justified PAR Rate
Aqua	3.20	0.12*
PAWC	4.04	0.51*
"Other Class A"	1.69	0.04
<b>Average</b>	<b>2.97</b>	<b>0.22</b>

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

- The PAR rate equals the number of PARs for each 1,000 residential customers. The justified PAR rate equals the number of justified PARs for each 1,000 residential customers.
- On average, there were nearly three PARs to BCS for each 1,000 residential customers of the major water companies in 2013. There was less than one justified PAR for each 1,000 residential customers.
- The implementation of Chapter 14 had an impact on the 2013 PAR rates and justified PAR rates.
- Appendix G, Table 3, presents the number of PARs, the PAR rate, the number of justified PARs and the justified PAR rate for Aqua, PAWC and the "Other Class A" water companies in 2012 and 2013.

## 2012-13 Justified Residential Payment Agreement Request (PAR) Rates Major Water Companies

Company	2012	2013
Aqua	0.19*	0.12*
PAWC	0.23*	0.51*
"Other Class A"	0.00	0.04
<b>Average</b>	<b>0.14</b>	<b>0.22</b>

\* Based on a probability sample of cases.

- The justified PAR rate equals the number of justified PARs for each 1,000 residential customers.
- The justified PAR rate decreased for Aqua, but increased for PAWC between 2012 and 2013.
- The implementation of Chapter 14 had an impact on the 2012 and 2013 justified PAR rates.
- Appendix G, Table 3, presents the number of PARs, the PAR rate, the number of justified PARs and the justified PAR rate for Aqua, PAWC and the "Other Class A" water companies in 2012 and 2013.

**2012-13 Response Time to BCS  
Residential Payment Agreement Requests (PARs)  
Major Water Companies**

<b>Company</b>	<b>Number of Days 2012</b>	<b>Number of Days 2013</b>	<b>Change in Days 2012 to 2013</b>
Aqua	3.1	5.7	2.6
PAWC	4.7	3.2	-1.5
"Other Class A"	5.9	5.7	-0.2
<b>Average</b>	<b>4.6</b>	<b>4.9</b>	<b>0.3</b>

- The calculation for average response time includes all residential PARs for the major water companies.
- Aqua’s response time increased 2.6 days to reach 5.7 days in 2013. PAWC’s response time decreased 1.5 days, from 4.7 days in 2012 to 3.2 days in 2013.

## Compliance

BCS provides water utilities with written clarifications or explanations of Chapter 56 provisions and other Commission regulations and policies.

The infraction rates in the table that follows are based on the review of all informal complaints that residential consumers filed with BCS from 2011 through 2013. Appendix H, Table 3, presents detailed information about the infractions identified on 2013 cases to the BCS.

## Commission Infraction Rates Major Water Companies

Company	2011	2012	2013
Aqua	0.22	0.22	0.32
PAWC	0.13	0.16	0.23
"Other Class A"	0.02	0.01	0.01

- The infraction rate is the number of informally verified infractions per 1,000 residential customers.
- The infraction rates for Aqua and PAWC increased from 2012 to 2013. The infraction rate for the "Other Class A" water companies remained stable.
- Appendix H, Table 3, presents the actual number of infractions for 2013 categorized by infraction category.
- As shown in Appendix H, Table 3, the dispute handling category is noteworthy due to both high volume and high percentage of the total number of infractions.

### Programs That Assist Low-Income Customers

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

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

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

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

At the end of 2013, 512 active participants were enrolled in the Helping Hand program. During the year, Aqua spent \$133,003 to complete eligibility interviews and household audits. In addition, the company provided \$21,590 in arrearage forgiveness credits to 601 program participants.

Pennsylvania American Water Co. (PAWC) – In 1991, PAWC established the “Help to Others” (H2O) program. The H2O program provides customers with an 85 percent discount on their monthly service fees – a savings of about \$12.00 per month. The program also provides water-saving devices and conservation education. As of January 2014, there were 17,450 customers billed the discounted rate.

In addition to a discount for water, the company also offers a discount for wastewater customers in Coatesville, Bushkill, Lehman Pike, Claysville, Clarion, East Stroudsburg, Blue Mountain and Winona Lakes. This discount offers a 15 percent discount off the total wastewater billing for those who qualify. As of January 2014, there were 493 customers receiving the discount for wastewater.

As part of the H2O program, PAWC also participates with the Dollar Energy Fund to provide cash grants of up to \$500 per year for those water and wastewater customers listed above. Dollar Energy Fund is a hardship fund administrator that provides cash assistance to utility customers who need help in paying their utility bills. During the 2012-13 program year, PAWC’s shareholders and customers provided \$314,500 in hardship fund benefits to 1,159 customers for an average benefit of \$271. In addition, PAWC’s shareholders provided \$10,000 for the 2012-13 program year for their wastewater customers. The program year has wastewater funds available totaling \$18,617.

United Water of Pennsylvania Inc. (United Water) - United Water implemented the “UW Cares” program in 2005. UW Cares is a nonprofit 501(c)(3) organization that provides financial assistance to customers who experience a temporary financial crisis caused by such occurrences as a job loss, severe illness, casualty or extensive military service. Cash grants up to \$100 are provided to qualifying customers who are first screened by the Salvation Army for eligibility. To be eligible for a grant, customers must have made a nominal payment within the last 90 days. During 2012, the company provided grants totaling \$6,541 to qualifying customers.

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

During 2013, the company expended \$176 for customer plumbing repairs and enrolled a total of five new customers in the York Water Cares program. As of program end 2013, seven customers received arrearage forgiveness benefits totaling \$775 for an average benefit of approximately \$111 per customer. The company anticipates an annual savings of \$714 in costs for termination proceedings that may be avoided as a result of customer participation in the York Water Cares program.

## 6. Telephone Industry

During 2013, BCS handled consumer complaints, PARs and inquiries from the customers of a variety of telecommunications service providers, including incumbent local exchange carriers (ILECs), competitive local exchange carriers (CLECs), long-distance companies and resellers. Just over 670 providers of telecommunications services were certificated and able to conduct business in Pennsylvania in 2013. Of this group of telecommunications providers, 37 were ILECs. Thirty-two of these ILECs were non-major utilities each serving fewer than 50,000 residential customers. The remaining five ILECs were major companies, each with more than 50,000 residential customers. Collectively, these five major telephone companies served just over 1.7 million residential customers in 2013.

This chapter will focus exclusively on the five major ILECs in 2013 – CenturyLink (CenturyLink); Frontier Communications Commonwealth Telephone Co. (Frontier Commonwealth); Verizon North Inc. (Verizon North); Verizon Pennsylvania (Verizon PA); and Windstream Communications (Windstream).

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

### Consumer Complaints

Although BCS handled consumer complaints about different types of telecommunications service providers in 2013, the complaints predominantly came from the residential customers of the five major ILECs. Overall, BCS handled 1,684 consumer complaints from residential customers of telecommunications service providers in 2013. Of those complaints, 1,597 were from residential customers of all of Pennsylvania's ILECs while 1,584 were from customers of the five major ILECs. Meanwhile, 69 consumer complaints were from residential customers of the CLECs operating in Pennsylvania. The remaining 18 consumer complaints were from residential customers of other providers of telecommunications services such as long-distance carriers, resellers, wireless carriers and Voice over Internet Protocol (VoIP) providers.

In September 2009, BCS began offering all Verizon PA and Verizon North customers who call with a service issue the voluntary option of being transferred to a special Verizon team that immediately begins working to resolve the customer's complaint. Prior to 2013, if a customer chose the voluntary transfer, BCS categorized the contact as an "inquiry" rather than as a "consumer complaint." Beginning Jan. 1, 2013, if a customer chooses the voluntary transfer, the contact is now classified as a "consumer complaint<sup>2</sup>."

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<sup>2</sup> BCS categorized 109 of these contacts regarding Verizon service issues as consumer complaints during 2013.

## Consumer Complaint Categories

The following table shows the percentage of 2013 consumer complaints from residential customers of the major telephone companies in each of the 11 categories used by BCS policy analysts to categorize consumer complaints about telephone companies.

### Consumer Complaint Categories: 2013 Major Local Telephone Companies

Categories	Century-Link	Frontier Commonwealth	Verizon North	Verizon PA**	Wind-stream	Telephone Majors
Unsatisfactory Service	14%	22%	41%	33%	39%	33%
Billing Disputes	32%	22%	20%	25%	11%	24%
Service Delivery	10%	27%	20%	20%	34%	21%
Service Terminations	32%	8%	5%	5%	3%	6%
Competition	4%	8%	3%	3%	4%	3%
Non-Recurring Charges	0%	4%	2%	1%	0%	1%
Credit and Deposits	0%	0%	0%	1%	3%	1%
Discontinuance/Transfer	0%	0%	2%	<1%	0%	<1%
Toll Services	0%	0%	0%	<1%	0%	<1%
Annoyance Calls	0%	2%	0%	0%	0%	<1%
All Other Problems	8%	8%	8%	12%	7%	11%
<b>Total-Number*</b>	<b>50</b>	<b>51</b>	<b>102</b>	<b>672</b>	<b>74</b>	<b>949</b>

\* Based on residential complaints evaluated by BCS as of Aug. 1, 2014.

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

- Categories are for all residential complaints filed with BCS, whether or not they were found to be justified. See Appendix D-2 for an explanation of complaint categories and Appendix E, Table 4, for the number of cases in each category.
- Seventy-eight percent of all complaints for the major telephone companies fall into one of three complaint categories: unsatisfactory service, billing disputes or service delivery.

- Unsatisfactory service complaints account for 33 percent of the total number of consumer complaints filed against the five major telephone companies in 2013. Last year, unsatisfactory service accounted for 29 percent of all consumer complaints filed against the major telephone companies.
- Billing disputes account for 24 percent of all consumer complaints filed against the five major telephone companies. In 2013, service delivery complaints made up another 21 percent of the complaints filed against the major telephone companies.

The 2012 and 2013 consumer complaint figures for justified consumer complaint rates and response times for each of the major telephone companies are presented on the following pages. Appendix F, Table 4, provides additional statistics about the consumer complaints from residential customers of the five major local telephone companies.

### 2013 Residential Consumer Complaint Rates/ Justified Consumer Complaint Rates Major Local Telephone Companies

Company	Consumer Complaint Rate	Justified Consumer Complaint Rate
CenturyLink	0.35	0.13
Frontier Commonwealth	0.44	0.24
Verizon North	0.49	0.22
Verizon PA	1.10	0.42*
Windstream	0.70	0.43
<b>Average</b>	<b>0.61</b>	<b>0.29</b>

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

- The consumer complaint rate equals the number of consumer complaints for each 1,000 residential customers. The justified consumer complaint rate equals the number of justified consumer complaints for each 1,000 residential customers.
- For the five major telephone companies, the average of their consumer complaint rates is more than two times greater than the average of their justified consumer complaint rates.
- Appendix F, Table 4, presents the number of consumer complaints, the consumer complaint rate, the number of justified consumer complaints and the justified consumer complaint rate for each major telephone company in 2012 and 2013.

## 2012-13 Justified Residential Consumer Complaint Rates Major Local Telephone Companies

Company	2012	2013
CenturyLink	0.14	0.13
Frontier Commonwealth	0.27	0.24
Verizon North	0.18	0.22
Verizon PA*	0.68	0.42
Windstream	0.10	0.43
<b>Average</b>	<b>0.27</b>	<b>0.29</b>

\* Based on a probability sample of cases.

- The justified consumer complaint rate equals the number of justified consumer complaints for each 1,000 residential customers.
- Three of the major telephone companies had justified consumer complaint rates that decreased while two had justified consumer complaint rates that increased. Windstream's justified consumer complaint rate increased 330 percent since 2012.
- Verizon PA and Windstream had justified consumer complaint rates that were higher than the industry average.
- Appendix F, Table 4, presents the number of consumer complaints, the consumer complaint rate, the number of justified consumer complaints and the justified consumer complaint rate for each major telephone company in 2012 and 2013.

## 2012-13 Response Time to BCS Residential Consumer Complaints Major Local Telephone Companies

Company	Number of Days 2012	Number of Days 2013	Change in Days 2012 to 2013
CenturyLink	13.3	18.3	5.0
Frontier Commonwealth	9.3	11.8	2.5
Verizon North	14.9	10.4	-4.5
Verizon PA	15.8	9.8	-6.0
Windstream	24.7	27.7	3.0
<b>Average</b>	<b>15.6</b>	<b>15.6</b>	<b>0.0</b>

- For the five major telephone companies, the average response time to consumer complaints remained stable at 15.6 from 2012 to 2013.
- The response time for Verizon PA decreased by six days. In contrast, CenturyLink increased their average response time by five days since 2012.

### Payment Agreement Requests

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

Under Chapter 64, a customer contact in response to a suspension notice is a dispute (as the term is defined in §64.2) only if the contact includes a disagreement with respect to the application of a provision of Chapter 64. Where telephone cases involving telephone service suspension are concerned, failure to negotiate a payment agreement does not in itself mean that a dispute exists. Consequently, in this report, telephone cases that involve PARs have been separated from telephone PARs that also involve a dispute. For the telephone industry, PARs that involve a dispute are classified as consumer complaints. During 2013, BCS handled 313 PARs from residential customers of telecommunications service providers. Of these PARs, 293 were from residential customers of the five major telephone

companies: CenturyLink, Frontier Commonwealth, Verizon North, Verizon PA and Windstream.

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

The 2012 and 2013 justified PAR rates and response times for the major telephone companies are presented in the tables that follow.

**2013 Residential Payment Agreement Request (PAR) Rates/  
Justified PAR Rates  
Major Local Telephone Companies**

<b>Company</b>	<b>PAR Rate</b>	<b>Justified PAR Rate</b>
CenturyLink	0.21	0.09
Frontier Commonwealth	0.08	0.02
Verizon North	0.04	0.01
Verizon PA	0.20	0.01*
Windstream	0.06	0.06
<b>Average</b>	<b>0.12</b>	<b>0.04</b>

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

- The PAR rate equals the number of PARs for each 1,000 residential customers. The justified PAR rate equals the number of justified PARs for each 1,000 residential customers.
- The overall 2013 PAR rate is three times the overall justified PAR rate for the five major telephone companies.
- For the individual companies, the ratio between the PAR rate and the justified PAR rate varies. For Verizon PA, the company’s 2013 PAR rate is 20 times the company’s justified PAR rate.
- Appendix G, Table 4, presents the number of PARs, the PAR rate, the number of justified PARs and the justified PAR rate for each major telephone company in 2012 and 2013.

## 2012-13 Justified Residential Payment Agreement Request (PAR) Rates Major Local Telephone Companies

Company	2012	2013
CenturyLink	0.05	0.09
Frontier Commonwealth	0.03	0.02
Verizon North	0.00	0.01
Verizon PA*	0.01	0.01
Windstream	0.00	0.06
<b>Average</b>	<b>0.02</b>	<b>0.04</b>

\* Based on a probability sample of cases.

- The justified PAR rate equals the number of justified PARs for each 1,000 residential customers.
- The average justified PAR rate for the five major telephone companies increased from 0.02 in 2012 to 0.04 in 2013. CenturyLink and Windstream had justified PAR rates greater than the 2013 industry average.
- Only Frontier Commonwealth had a justified PAR rate that decreased from 2012 to 2013.
- Appendix G, Table 4, presents the number of PARs, the PAR rate, the number of justified PARs and the justified PAR rate for each major telephone company in 2012 and 2013.

**2012-13 Response Time to BCS  
Residential Payment Agreement Requests (PARs)  
Major Local Telephone Companies**

<b>Company</b>	<b>Number of Days 2012</b>	<b>Number of Days 2013</b>	<b>Change in Days 2012 to 2013</b>
CenturyLink	8.3	14.8	6.5
Frontier Commonwealth	7.3	9.5	2.2
Verizon North	11.5	8.1	-3.4
Verizon PA	7.5	2.6	-4.9
Windstream	21.2	23.0	1.8
<b>Average</b>	<b>11.1</b>	<b>11.6</b>	<b>0.5</b>

- The average response time to PARs for the five major telephone companies increased slightly from 11.1 days in 2012 to 11.6 days in 2013.
- Of the five major telephone companies, only Verizon North and Verizon PA reduced their response time to PARs from 2012 to 2013.

### Termination of Service

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

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

Company	Residential Service Terminations				Termination Rates		
	2011	2012	2013	% Change 2012-13	2011	2012	2013
CenturyLink	5,136	8,412	9,840	17%	30.13	52.86	65.58
Frontier Commonwealth	552	2,472*	3,048	23%	4.08	20.00*	26.14
Verizon North	7,056	7,140	6,972	-2%	27.14	30.66	33.22
Verizon PA	136,572	57,432	55,956	-3%	80.82	40.49	47.10
Windstream	3,648	3,516	4,140	18%	30.88	31.25	38.78
<b>Major Telephone</b>	<b>152,964</b>	<b>78,972</b>	<b>79,956</b>	<b>1%</b>			
<b>Average of Rates</b>					<b>34.61</b>	<b>35.05</b>	<b>42.16</b>

\* BCS revised the 2012 number of residential service terminations and termination rate for Frontier Commonwealth. It was discovered Frontier Commonwealth submitted incorrect information when filing their 2012 reporting requirements.

- The termination rate equals the number of basic service terminations for each 1,000 residential customers.
- Overall, the average residential service termination rate for the major telephone companies increased from 35.05 in 2012 to 42.16 in 2013.
- From 2012 to 2013, the termination rate increased in each of the five major telephone companies. Frontier Commonwealth had the greatest increase, up 30 percent since 2012.

### Compliance

The informal compliance notification process enables BCS to provide companies with written clarifications and explanations of Chapter 63 and Chapter 64 provisions and BCS policies. The informal compliance process is specifically designed to identify systemic errors. Companies can then investigate the scope of the problem and take corrective action. Appropriate corrective action usually involves modifying a computer program; revising the text of a notice, a billing or a letter; changing a company procedure; or providing additional staff training to ensure the proper implementation of a sound procedure.

Each year, BCS retrieves infraction data from the BCS Compliance Tracking System and produces tables that present Chapter 63 and Chapter 64 infraction statistics for the major telephone companies reviewed in this chapter. The infraction statistics are typically drawn from all cases that residential consumers filed with BCS in 2011, 2012 and 2013.

Appendix H, Tables 4 and 5, present detailed information about the infractions identified on 2013 cases to the BCS.

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

<b>Company</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>
CenturyLink	0.22	0.13	0.05
Frontier Commonwealth	0.60	0.26	0.37
Verizon North	0.52	0.35	0.41
Verizon PA	1.87	1.18	0.57
Windstream	0.18	0.05	1.47

- The infraction rate is the number of informally verified infractions per 1,000 residential customers.
- Infraction rates increased for three of the five major telephone companies in 2013. Windstream’s infraction rate had the largest percentage increase since 2012.
- Appendix H, Table 4, presents the actual number of infractions of Chapter 63 found on 2013 informal complaints for the major local telephone companies by infraction category.

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

Company	2011	2012	2013
CenturyLink	0.56	0.14	0.26
Frontier Commonwealth	0.61	0.34	0.31
Verizon North	0.22	0.16	0.11
Verizon PA	0.70	0.40	0.20
Windstream	0.36	0.15	0.27

- The infraction rate is the number of informally verified infractions per 1,000 residential customers.
- Infraction rates decreased for three of the five major telephone companies in 2013. In contrast, CenturyLink and Windstream had large increases, up 86 and 80 percent, respectively, since 2012.
- Appendix H, Table 5, presents the actual number of infractions of Chapter 64 found on 2013 informal complaints for the major local telephone companies by infraction category.

### Universal Service Programs

As part of its ongoing responsibilities, BCS monitors the universal service programs of local telephone companies and wireless companies. For the telephone industry, universal service programs<sup>3</sup> include Lifeline 135 Service (Lifeline 135), Lifeline Service (Lifeline) and the Universal Telephone Assistance Program (UTAP). These programs ensure that low-income consumers have access to telephone service by providing discounts or credits for telephone service. The Commission approved the implementation of Pennsylvania’s first universal service program for local telephone companies in 1989.<sup>4</sup> In December 1997, the Commission approved Lifeline service plans for 44 telephone companies which led to the statewide implementation of telephone companies’ Lifeline programs in 1998.

### Lifeline and Lifeline 135 Service

The Commission’s 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>5</sup> It added the National School Free Lunch Program and an income-only based criterion (income at or below 135 percent of the federal poverty

<sup>3</sup> With the exception of UTAP, these programs are supported fully or in part by federal universal service funds.

<sup>4</sup> The Link-Up America Program was the first universal service program. The FCC eliminated this program in 2012.

<sup>5</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.

guidelines) as new criteria for Pennsylvania's Lifeline program eligibility. Second, the Final Order directed all jurisdictional ETCs<sup>6</sup> to implement the Lifeline provisions contained in Chapter 30. Under these provisions<sup>7</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.

On Dec. 18, 2008, the Commission adopted the initial decision of a PUC administrative law judge ordering Verizon PA and Verizon North to revise their tariffs to permit their Lifeline 135 customers the opportunity to subscribe to three types of bundled service plans.<sup>8</sup> Those customers may subscribe to a bundled service package plan that offers 1) local service with three optional services; 2) local service with three optional services plus regional toll service; or 3) local service with three optional services plus regional toll service and long-distance service at a single monthly rate.

In August 2010, the Commission adopted the final Policy Statement on the Commonwealth of Pennsylvania Guidelines for Designation and Annual Recertification as an Eligible Telecommunication Carrier (ETC) for purposes of Federal Universal Service Support (ETC Guidelines).<sup>9</sup> Designation as an ETC for provision of Lifeline service would permit the wire-line and wireless providers to participate in the Universal Service Fund's (USF) Lifeline program in order to receive universal service support for these services. Currently, there are 14 wireless telephone companies providing Lifeline services in Pennsylvania. As of September 2014, there are 14 wireless telephone company ETC petitions pending.

On March 2, 2012, the FCC issued a Final Rule<sup>10</sup> which reformed and begins to modernize the Universal Service Fund's Lifeline program. The reforms substantially strengthen protections against waste, fraud and abuse; improve program administration and accountability; improve enrollment and consumer disclosures; initiate modernization of the program for broadband; and constrain the growth of the program in order to reduce the burden of all who contribute to the Universal Service Fund. In addition, the FCC has identified numerous unserved census block groups in Pennsylvania where wireless eligible telecommunications carriers (ETCs) may bid to receive Mobility Fund Phase 1 support to build infrastructure over which to deliver 3G or better broadband and voice service.

The following table shows enrollment activity for the major telephone companies' Lifeline programs in 2012 and 2013.

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<sup>6</sup> To provide Lifeline services, telephone companies must be designated Eligible Telecommunications Carriers (ETC) by their state commission or the FCC. ETCs may receive universal service funding.

<sup>7</sup> 66 Pa. C.S. § 30 (f)(1-4). These rules apply to all Pennsylvania incumbent local exchange carriers and three competitive local exchange carriers.

<sup>8</sup> See Dockets C-20077916 and C-20077917.

<sup>9</sup> Docket No. M-2010-2164741 which codifies the guidelines at 52 Pa. Code § 69.2501.

<sup>10</sup> 47 CFR Part 54 – Universal Service

## Lifeline Service Activity 2012-13

Company	Total Number of Customers Who Received Lifeline Service		Total Number of Customers Enrolled as of December	
	2012	2013	2012	2013
CenturyLink	4,176	2,977	1,891	2,018
Frontier Commonwealth	5,441	4,908	4,618	2,086
Verizon North*	14,232	8,534	6,563	4,666
Verizon PA*	109,150	58,590	45,579	30,450
Windstream	5,783	4,905	3,718	3,385
<b>Total</b>	<b>138,782</b>	<b>79,914</b>	<b>62,369</b>	<b>42,605</b>

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

As of July 1, 2013, the monthly credit<sup>11</sup> is \$9.25 for the Lifeline 135 program, and \$11.75 for the Verizon companies' Lifeline program.

### Universal Telephone Assistance Program

Verizon PA implemented a Universal Telephone Assistance Program (UTAP) along with its Lifeline service program as part of a settlement agreement that was approved by the Commission in 1995. Verizon PA is the only company that offers a financial assistance program that helps existing Lifeline customers and qualified Lifeline applicants (with a pre-existing basic service arrearage) to restore their basic telephone service. The Dollar Energy Fund manages UTAP and distributes funds to qualified customers and Lifeline applicants. The average UTAP assistance grant given to customers in 2013 was \$76. Overall, UTAP distributed \$20,259 in financial assistance to 265 of Verizon PA's qualified customers in 2013.

### 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 Public Welfare (DPW) with service descriptions, subscription forms, contact telephone numbers and service area information so DPW can notify its clients about the availability of Lifeline service. In 2005, a working group consisting of representatives of the PUC, Pennsylvania Telephone Association, the Office of Consumer Advocate and the Pennsylvania Utility Law Project worked with DPW to implement this provision. Commission staff coordinated with members of the working group to develop subscription forms and listings of company contacts by county. Commission staff

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

continues to provide DPW with copies of informational brochures and a link to the Commission's website for information about companies that offer Lifeline programs.

## Wireless ETC Designation

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

On Oct. 14, 2011, the Commission approved YourTel America's petition to become an ETC in Pennsylvania. On May 24, 2012, the Commission approved the ETC petitions for Cricket Communications, Inc.; Keystone Wireless, LLC d/b/a Immix Wireless; T-Mobile Northeast, LLC; T-Mobile Central, LLC and Voicestream Pittsburgh, LP. Keystone and T-Mobile each petitioned for both low-income and high-cost support and are seeking Mobility Fund Phase 1 support. The Mobility Fund Phase 1 support will accelerate delivery of advanced mobile services to tens of thousands of road miles that currently lack 3G or 4G service. Winning bidders must deploy either 3G service within two years or 4G service within three years of the award. T-Mobile was approved for the Mobility Fund Phase 1 support in Pennsylvania. T-Mobile was awarded \$1,772,094, equaling 74.93 road miles.

The Commission approved the ETC petitions of Budget Prepay, Inc., Global Connections Inc. of America and TAG Mobile, LLC during the remainder of 2012 and the ETC petitions of Q Link Wireless, LLC; Blue Jay Wireless, LLC; Nexus Communications, Inc., Telrite Corporation and Stahlstown Telco, Inc. in 2013.

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

# Glossary of Terms

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

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

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

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

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

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

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

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

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

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

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

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

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

Justified Payment Agreement Request Rate - The number of justified PARs per 1,000 residential customers.

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

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

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

Payment Agreement Request Rate - The number of PARs per 1,000 residential customers.

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

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

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

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

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

# Appendices

## Appendix A

### Consumer Ratings of BCS Service

How quickly did the PUC handle your request?		
	2012	2013
Very quickly	57%	51%
Fairly quickly	26%	32%
Not very quickly	6%	8%
Not at all quickly	4%	5%
Don't recall	2%	2%
Have not heard from PUC	4%	3%
How easy to understand was the information the PUC gave you about the outcome of the problem?		
	2012	2013
Very easy	51%	51%
Fairly easy	19%	23%
Not very easy	4%	4%
Not at all easy	1%	2%
Don't recall	2%	3%
Did not receive any information	22%	18%
How polite was the first person you talked with at the PUC?		
	2012	2013
Very polite	79%	71%
Fairly polite	15%	19%
Not very polite	2%	4%
Not at all polite	<1%	1%
Don't recall	2%	1%
Did not speak to anyone	2%	3%
How interested in helping you was the first person you talked with at the PUC?		
	2012	2013
Very interested	70%	63%
Fairly interested	23%	25%
Not very interested	4%	7%
Not at all interested	1%	2%
Don't recall	1%	1%
Did not speak to anyone	1%	2%
If you had another problem with a utility, would you contact the PUC again?		
	2012	2013
Yes	85%	83%
No	5%	7%
Not sure	10%	10%

## Appendix B

### Total Volume of Consumer Complaints and Payment Agreement Requests to the BCS in 2012 and 2013

Industry	Consumer Complaints						Payment Agreement Requests					
	Residential			Commercial			Residential			Commercial		
	2012	2013	Percent Change	2012	2013	Percent Change	2012	2013	Percent Change	2012	2013	Percent Change
Electric	7,742	6,563	-15%	778	646	-17%	36,158	39,929	10%	183	162	-11%
Gas	2,543	2,263	-11%	190	199	5%	11,585	13,717	18%	78	89	14%
Water	724	545	-25%	91	44	-52%	4,607	3,896	-15%	21	9	-57%
Telephone	2,443	1,684	-31%	314	259	-18%	394	313	-21%	10	2	-80%
Other	5	8	60%	0	0	0%	6	6	0%	0	0	0%
<b>Total</b>	<b>13,457</b>	<b>11,063</b>	<b>-18%</b>	<b>1,373</b>	<b>1,148</b>	<b>-16%</b>	<b>52,750</b>	<b>57,861</b>	<b>10%</b>	<b>292</b>	<b>262</b>	<b>-10%</b>

## Appendix C

### 2013 Residential Consumer Complaints for Companies Not Included in Industry Chapters

Company*	Number of Complaints	Total Number of Complaints Includes Secondary Company Complaints **
<b>ELECTRIC</b>		
Non-Major Electric Distribution Companies (EDCs)***	10	11
AEP Energy (EGS)	9	11
Ambit Energy (EGS)	10	12
AP Gas and Electric (EGS)	10	13
Blue Point Energy (EGS)	8	9
Bounce Energy (EGS)	9	13
Champion Energy Services (EGS)	14	15
Clearview Electric (EGS)	21	22
Commerce Energy (EGS)	10	10
Con Edison Solutions (EGS)	10	13
Constellation Energy Power Choice (EGS)	11	14
Direct Energy (EGS)	187	212
Discount Energy (EGS)	15	16
Dominion Energy Solutions (EGS)	26	39
Energetix (EGS)	10	11
Energy Plus Holdings (EGS)	41	46
Ethical Electric (EGS)	32	33

\* Only those non-major companies having five or more residential consumer complaints in 2013 are listed individually. Non-major companies having fewer than five residential consumer complaints in 2013 are included in the appropriate general category for their industry, i.e. "Other Non-Major Electric Distribution Companies" or "Other CLECs," etc.

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

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

## Appendix C (Continued)

### 2013 Residential Consumer Complaints for Companies Not Included in Industry Chapters

Company*	Number of Complaints	Total Number of Complaints Includes Secondary Company Complaints **
<b>ELECTRIC (continued)</b>		
First Energy Solutions (EGS)	311	358
Gateway Energy (EGS)	33	38
Great American Power (EGS)	6	7
Green Mountain Energy (EGS)	12	13
Hiko Energy (EGS)	11	11
Hop Energy (EGS)	13	13
IDT Energy (EGS)	103	119
Interstate Gas Supply (EGS)	13	16
Liberty Power (EGS)	30	31
New Energy Ventured - Mid Atlantic (EGS)	10	12
Nextera Energy (EGS)	8	11
North American Power (EGS)	62	74
NRG Solutions (EGS)	7	8
Oasis Energy (EGS)	27	28
Palmco Power PA (EGS)	36	44
Pennsylvania Gas and Electric (EGS)	85	97
PPL Energy Plus (EGS)	19	26

\* Only those non-major companies having five or more residential consumer complaints in 2013 are listed individually. Non-major companies having fewer than five residential consumer complaints in 2013 are included in the appropriate general category for their industry, i.e. "Other Non-Major Electric Distribution Companies" or "Other CLECs," etc.

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

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

## Appendix C (Continued)

### 2013 Residential Consumer Complaints for Companies Not Included in Industry Chapters

Company*	Number of Complaints	Total Number of Complaints Includes Secondary Company Complaints **
<b>ELECTRIC (continued)</b>		
Public Power (EGS)	24	26
Rescom Energy (EGS)	45	50
Respond Power (EGS)	57	62
Spark Energy (EGS)	10	12
Sperian Energy (EGS)	18	19
Starion Energy of PA (EGS)	92	98
Stream Energy (EGS)	8	12
Superior Plus Energy Services (EGS)	3	5
TriEagle Energy (EGS)	4	6
Verde Energy USA (EGS)	47	54
Viridian Energy (EGS)	6	7
Washington Gas Energy Services (EGS)	40	48
Xoom Energy (EGS)	12	12
Other Electric Generation Suppliers (EGSs)***	32	38
<b>Total Non-Major Electric</b>	<b>1,617</b>	<b>1,855</b>

\* Only those non-major companies having five or more residential consumer complaints in 2013 are listed individually. Non-major companies having fewer than five residential consumer complaints in 2013 are included in the appropriate general category for their industry, i.e. "Other Non-Major Electric Distribution Companies" or "Other CLECs," etc.

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

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

## Appendix C (Continued)

### 2013 Residential Consumer Complaints for Companies Not Included in Industry Chapters

Company*	Number of Complaints	Total Number of Complaints Includes Secondary Company Complaints **
<b>GAS</b>		
Herman Riemer Gas (NGDC)	8	8
Mountain Energy (NGDC)	16	16
Peoples TWP (f.k.a TW Phillips) (NGDC)	20	20
UGI Central Penn Gas (NGDC)	27	27
Other Non-Major Natural Gas Distribution Companies (NGDCs)***	7	8
Agway Energy Services (NGS)	4	5
Ambit Northeast (NGS)	5	5
Direct Energy (NGS)	8	9
Dominion Energy Solutions (NGS)	13	16
Major Energy (NGS)	16	17
Palmco Energy (NGS)	6	6
Pennsylvania Gas and Electric (NGS)	11	11
Washington Gas Energy (NGS)	5	5
Other Natural Gas Suppliers (NGSs)***	30	32
<b>Total Non-Major Gas</b>	<b>176</b>	<b>185</b>

\* Only those non-major companies having five or more residential consumer complaints in 2013 are listed individually. Non-major companies having fewer than five residential consumer complaints in 2013 are included in the appropriate general category for their industry, i.e. "Other Non-Major Electric Distribution Companies" or "Other CLECs," etc.

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

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

## Appendix C (Continued)

### 2013 Residential Consumer Complaints for Companies Not Included in Industry Chapters

Company*	Number of Complaints
<b>WATER</b>	
Penn Estate Utilities (Private)	5
Other Private Water***	21
Municipal Water***	4
<b>Total Non-Major Water</b>	<b>30</b>
<b>TELEPHONE</b>	
Other Non-Major Incumbent Local Exchange Carriers (ILECs)***	13
AT&T Local (CLEC)	9
Cavalier Telephone Mid-Atlantic (CLEC)	8
Comcast Digital Phone (CLEC)	8
Full Service Network (CLEC)	21
RCN (CLEC)	6
Other Competitive Local Exchange Carriers (CLECs)***	17
Other Providers of Telecommunications Services***	18
<b>Total Non-Major Telephone</b>	<b>100</b>

\* Only those non-major companies having five or more residential consumer complaints in 2013 are listed individually. Non-major companies having fewer than five residential consumer complaints in 2013 are included in the appropriate general category for their industry, i.e. "Other Non-Major Electric Distribution Companies" or "Other CLECs," etc.

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

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

# Appendix D-1

## Classification of Consumer Complaints

### Electric, Gas & Water

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## **Appendix D-2**

### **Classification of Consumer Complaints Telephone**

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

**Audiotex** - Complaints about the company's failure to resolve billing problems related to special phone entertainment or information services. In 2013, BCS evaluated no residential consumer complaints about audiotex.

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

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

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

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

**Extended Area of Service (EAS)** - Complaints about a limited local calling area. In 2013, BCS evaluated no residential consumer complaints about EAS.

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

**Rates** - General or specific complaints about a utility's rates: general or specific rates are too high or the customer is being billed on the incorrect rate. In 2013, BCS evaluated one residential consumer complaint about rates.

**Sales Nonbasic Services** - Complaints related to the sale of nonbasic services, including the availability of certain services. In 2013, BCS evaluated one residential consumer complaint about sales of nonbasic services.

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

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

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

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

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

## Appendix E - Table 1

### Consumer Complaint Categories: 2013\* Major Electric Distribution Companies

Categories**	Duquesne	Met-Ed	PECO***+	Penelec	Penn Power	PPL***	UGI-Electric	West Penn	Electric Majors
Billing Disputes	63	100	134	77	22	140	6	76	618
Metering	7	142	25	93	13	45	2	129	456
Personnel Problems	74	87	55	58	10	41	4	65	394
Discontinuance/ Transfer	31	57	51	35	10	56	3	33	276
Credit and Deposits	30	44	57	34	11	27	18	23	244
Service Interruptions	27	30	7	19	2	9	1	73	168
Damages	8	22	16	19	6	8	1	65	145
Service Extensions	6	17	6	8	1	3	2	64	107
Service Quality	10	18	17	12	2	13	0	33	105
Other Payment Issues	23	9	19	11	2	11	2	19	96
Scheduling Delays	3	13	5	13	1	12	1	25	73
Rates	1	5	0	2	0	4	0	3	15
All Other Problems	112	62	91	76	17	78	16	53	505
<b>Total*</b>	<b>395</b>	<b>606</b>	<b>483</b>	<b>457</b>	<b>97</b>	<b>447</b>	<b>56</b>	<b>661</b>	<b>3,202</b>

\* Categories are for residential complaints evaluated by BCS as of Aug. 1, 2014, whether the case outcome was found to be "justified."

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

\*\*\* Statistics are based on a probability sample of cases.

+ PECO statistics include electric and gas.

**Appendix E - Table 2**  
**Consumer Complaint Categories: 2013\***  
**Major Natural Gas Distribution Companies**

Categories**	Columbia	Equitable	NFG	Peoples	PGW	UGI-Gas	UGI Penn Natural	Gas Majors
Billing Disputes	16	19	13	48	74	29	15	214
Personnel Problems	45	34	15	29	46	22	6	197
Discontinuance/ Transfer	5	13	13	13	102	11	10	167
Metering	7	1	10	26	70	0	1	115
Damages	19	5	2	25	8	13	1	73
Other Payment Issues	2	1	3	8	54	1	2	71
Scheduling Delays	13	3	5	8	24	6	3	62
Credit and Deposits	2	4	0	7	7	19	18	57
Service Quality	12	4	5	13	6	6	4	50
Service Extensions	9	1	6	8	6	11	7	48
Service Interruptions	1	1	1	3	3	0	0	9
Rates	3	1	0	2	0	0	0	6
All Other Problems	20	24	18	12	86	11	16	187
<b>Total*</b>	<b>154</b>	<b>111</b>	<b>91</b>	<b>202</b>	<b>486</b>	<b>129</b>	<b>83</b>	<b>1,256</b>

\* Categories are for residential complaints evaluated by BCS as of Aug. 1, 2014, whether the case outcome was found to be "justified."

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

## Appendix E - Table 3

### Consumer Complaint Categories: 2013\* Major Water Companies

Categories**	Aqua	PAWC	"Other Class A" Water	All "Class A" Water
Billing Disputes	78	140	10	228
Service Quality	11	30	7	48
Personnel Problems	15	22	1	38
Damages	5	16	3	24
Scheduling Delays	5	13	1	19
Metering	7	8	3	18
Service Extensions	4	9	1	14
Discontinuance/Transfer	3	8	0	11
Other Payment Issues	4	3	1	8
Service Interruptions	3	4	0	7
Credit and Deposits	3	1	0	4
Rates	1	0	0	1
All Other Problems	31	48	3	82
<b>Total*</b>	<b>170</b>	<b>302</b>	<b>30</b>	<b>502</b>

\* Categories are for residential complaints evaluated by BCS as of Aug. 1, 2014, whether the case outcome was found to be "justified."

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

**Appendix E - Table 4**  
**Consumer Complaint Categories: 2013\***  
**Major Local Telephone Companies**

Categories**	CenturyLink	Frontier Common- wealth	Verizon North	Verizon PA	Windstream	Telephone Majors
Unsatisfactory Service	7	11	42	221	29	310
Billing Disputes	16	11	20	170	8	225
Service Delivery	5	14	20	135	25	199
Service Terminations	16	4	5	32	2	59
Competition	2	4	3	21	3	33
Non-Recurring Charges	0	2	2	4	0	8
Credit and Deposits	0	0	0	5	2	7
Discontinuance/ Transfer	0	0	2	1	0	3
Toll Services	0	0	0	2	0	2
Annoyance Calls	0	1	0	0	0	1
All Other Problems	4	4	8	81	5	102
<b>Total*</b>	<b>50</b>	<b>51</b>	<b>102</b>	<b>672</b>	<b>74</b>	<b>949</b>

\* Categories are for residential complaints evaluated by BCS as of Aug. 1, 2014, whether the case outcome was found to be "justified."

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

## Appendix F - Table 1

### 2012-13 Residential Consumer Complaint Statistics Major Electric Distribution Companies

Company Name	2013 Residential Customers	Residential Consumer Complaints to BCS			Consumer Complaint Rates <sup>1</sup>		Justified Consumer Complaints			
		2012	2013	% Change in #	2012	2013	Numbers <sup>2</sup> / Rates <sup>3</sup> 2012	Numbers <sup>2</sup> / Rates <sup>3</sup> 2013		
Duquesne	526,814	815	505	-38%	1.55	0.96	82	52	0.10	
Met-Ed	488,375	1,173	819	-30%	2.41	1.68	166	169	0.35	
PECO <sup>5</sup>	1,435,241	1,564	1,218	-22%	1.09	0.85	220*	222*	0.15*	
Penelec	504,543	702	589	-16%	1.39	1.17	62	103	0.20	
Penn Power	141,147	153	101	-34%	1.09	0.72	20	16	0.11	
PPL	1,218,734	936	706	-25%	0.77	0.58	126*	74*	0.06*	
UGI-Electric	55,947	81	57	-30%	1.45	1.02	4	5	0.09	
West Penn	619,531	894	951	6%	1.45	1.54	187	183	0.30	
<b>Major Electric</b>	<b>4,990,332</b>	<b>6,318</b>	<b>4,946</b>	<b>-22%</b>			<b>867</b>	<b>824</b>		
<b>Average of Rates</b>					<b>1.394</b>	<b>1.074</b>			<b>0.194</b>	<b>0.184</b>

- 1 Consumer complaint rate = consumer complaints per 1,000 residential customers.
  - 2 Estimated based on the number of cases on CSIS as of Aug. 1, 2014.
  - 3 Justified consumer complaint rate = justified consumer complaints per 1,000 residential customers.
  - 4 Does not include UGI-Electric.
  - 5 PECO statistics include electric and gas.
- \* Based on a probability sample of cases.

## Appendix F - Table 2

### 2012-13 Residential Consumer Complaint Statistics Major Natural Gas Distribution Companies

Company Name	2013 Residential Customers	Residential Consumer Complaints to BCS			Consumer Complaint Rates <sup>1</sup>		Justified Consumer Complaints			
		2012	2013	% Change in #	2012	2013	Numbers <sup>2</sup> / Rates <sup>3</sup> 2012	Numbers <sup>2</sup> / Rates <sup>3</sup> 2013		
Columbia	384,213	220	180	-18%	0.57	0.47	18	12	0.03	
Equitable	242,632	175	140	-20%	0.72	0.58	10	8	0.03	
NFG	198,763	100	92	-8%	0.50	0.46	14	16	0.08	
Peoples	330,123	304	245	-19%	0.92	0.74	62	49	0.15	
PGW	468,943	1,307	1,178	-10%	2.72	2.51	328*	334*	0.71*	
UGI-Gas	324,576	187	166	-11%	0.59	0.51	17	9	0.03	
UGI Penn Natural	149,097	117	86	-26%	0.80	0.58	13	8	0.05	
<b>Major Gas</b>	<b>2,098,347</b>	<b>2,410</b>	<b>2,087</b>	<b>-13%</b>			<b>462</b>	<b>436</b>		
<b>Average of Rates</b>					<b>0.98</b>	<b>0.84</b>			<b>0.17</b>	<b>0.16</b>

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

2 Estimated based on the number of cases on CSIS as of Aug. 1, 2014.

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

\* Based on a probability sample of cases.

## Appendix F - Table 3

### 2012-13 Residential Consumer Complaint Statistics Major Water Companies

Company Name	2013 Residential Customers	Residential Consumer Complaints to BCS			Consumer Complaint Rates <sup>1</sup>		Justified Consumer Complaints			
		2012	2013	% Change in #	2012	2013	Numbers <sup>2</sup> / Rates <sup>3</sup> 2012	Numbers <sup>2</sup> / Rates <sup>3</sup> 2013		
Aqua	387,504	258	175	-32%	0.67	0.45	79	0.21	76	0.20
PAWC	591,405	403	309	-23%	0.68	0.52	85	0.14	108	0.18
"Other Class A" Water	136,223	34	31	-9%	0.25	0.23	2	0.01	5	0.04
<b>Major Water</b>	<b>1,115,132</b>	<b>695</b>	<b>515</b>	<b>-26%</b>			<b>166</b>		<b>189</b>	
<b>Average of Rates</b>					<b>0.54</b>	<b>0.40</b>		<b>0.12</b>		<b>0.14</b>

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

2 Estimated based on the number of cases on CSIS as of Aug. 1, 2014.

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

## Appendix F - Table 4

### 2012-13 Residential Consumer Complaint Statistics Major Local Telephone Companies

Company Name	2013 Residential Customers	Residential Consumer Complaints to BCS		Consumer Complaint Rates <sup>1</sup>		Justified Consumer Complaints			
		2012	2013	% Change in #	2012	2013	Numbers <sup>2</sup> / Rates <sup>3</sup> 2012	Numbers <sup>2</sup> / Rates <sup>3</sup> 2013	
CenturyLink	150,048	87	52	-40%	0.55	0.35	22	19	0.13
Frontier Commonwealth	116,588	86	51	-41%	0.73	0.44	32	28	0.24
Verizon North**	209,853	96	102	6%	0.41	0.49	42	47	0.22
Verizon PA**	1,188,096	1,906	1,304	-32%	1.34	1.10	967*	499*	0.42*
Windstream	106,769	62	75	21%	0.55	0.70	11	46	0.43
<b>Major Telephone</b>	<b>1,771,354</b>	<b>2,237</b>	<b>1,584</b>	<b>-29%</b>			<b>1,074</b>	<b>639</b>	
<b>Average of Rates</b>					<b>0.72</b>	<b>0.61</b>		<b>0.27</b>	<b>0.29</b>

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

<sup>2</sup> Estimated based on the number of cases on CSIS as of Aug. 1, 2014.

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

\* Based on a probability sample of cases.

\*\* BCS is currently offering all Verizon customers who call with a service issue the voluntary option of being transferred to a special Verizon team that immediately begins working to resolve the customer's complaint. Prior to 2013, if a customer chose the voluntary transfer, BCS categorized the contact as an "inquiry" rather than as a "consumer complaint". Beginning Jan. 1, 2013, if a customer chooses the voluntary transfer, the contact is now classified as a "consumer complaint".

## Appendix G - Table 1

### 2012-13 Residential Payment Agreement Request (PAR) Statistics Major Electric Distribution Companies

Company Name	2013 Residential Customers	Residential PARs to BCS			PAR Rates <sup>1</sup>		Justified PARs			
		2012	2013	% Change In #	2012	2013	Numbers <sup>2</sup> / Rates <sup>3</sup> 2012	Numbers <sup>2</sup> / Rates <sup>3</sup> 2013		
Duquesne	526,814	6,025	4,998	-17%	11.46	9.49	67	0.13	162	0.31
Met-Ed	488,375	2,380	2,610	10%	4.88	5.34	53	0.11	183	0.37
PECO <sup>5</sup>	1,435,241	7,911	7,419	-6%	5.52	5.17	66	0.05	139	0.10
Penelec	504,543	2,110	2,457	16%	4.18	4.87	41	0.08	129	0.26
Penn Power	141,147	607	661	9%	4.32	4.68	12	0.09	19	0.13
PPL	1,218,734	14,897	19,307	30%	12.25	15.84	542	0.45	816	0.67
UGI-Electric	55,947	698	673	-4%	12.47	12.03	9	0.16	23	0.41
West Penn	619,531	1,437	1,712	19%	2.33	2.76	48	0.08	93	0.15
<b>Major Electric</b>	<b>4,990,332</b>	<b>36,065</b>	<b>39,837</b>	<b>10%</b>			<b>838</b>		<b>1,564</b>	
<b>Average of Rates</b>					<b>6.42<sup>4</sup></b>	<b>6.88<sup>4</sup></b>		<b>0.14<sup>4</sup></b>		<b>0.28<sup>4</sup></b>

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

2 With the exception of Penn Power and UGI-Electric, each company's number of justified PARs is estimated based on a probability sample of cases. The number of justified PARs for all EDCs is based on the number of cases on CSIS as of Aug. 1, 2014.

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

4 Does not include UGI-Electric.

5 PECO statistics include electric and gas.

## Appendix G - Table 2

### 2012-13 Residential Payment Agreement Request (PAR) Statistics Major Natural Gas Distribution Companies

Company Name	2013 Residential Customers	Residential PARs to BCS			PAR Rates <sup>1</sup>		Justified PARs			
		2012	2013	% Change in #	2012	2013	Numbers <sup>2</sup> / Rates <sup>3</sup> 2012	Numbers <sup>2</sup> / Rates <sup>3</sup> 2013		
Columbia	384,213	849	1,029	21%	2.22	2.68	12	0.03	8	0.02
Equitable	242,632	1,062	1,449	36%	4.39	5.97	15	0.06	25	0.10
NFG	198,763	676	806	19%	3.40	4.06	4	0.02	26	0.13
Peoples	330,123	520	610	17%	1.58	1.85	35	0.11	27	0.08
PGW	468,943	4,038	5,240	30%	8.41	11.17	73	0.15	173	0.37
UGI-Gas	324,576	2,366	2,553	8%	7.46	7.87	139	0.44	157	0.48
UGI Penn Natural	149,097	1,528	1,594	4%	10.39	10.69	95	0.65	111	0.74
<b>Major Gas</b>	<b>2,098,347</b>	<b>11,039</b>	<b>13,281</b>	<b>20%</b>			<b>373</b>		<b>527</b>	
<b>Average of Rates</b>					<b>5.41</b>	<b>6.33</b>		<b>0.21</b>		<b>0.28</b>

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

<sup>2</sup> With the exception of Columbia and Peoples, each company's number of justified PARs is estimated based on a probability sample of cases. The number of justified PARs for all NGDCs is based on the number of cases on CSIS as of Aug. 1, 2014.

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

## Appendix G - Table 3

### 2012-13 Residential Payment Agreement Request (PAR) Statistics Major Water Companies

Company Name	2013 Residential Customers	Residential PARs to BCS			PAR Rates <sup>1</sup>		Justified PARs			
		2012	2013	% Change in #	2012	2013	Numbers <sup>2</sup> / Rates <sup>3</sup> 2012	Numbers <sup>2</sup> / Rates <sup>3</sup> 2013		
Aqua	387,504	1,627	1,239	-24%	4.23	3.20	73*	0.19*	48*	0.12*
PAWC	591,405	2,690	2,387	-11%	4.56	4.04	138*	0.23*	304*	0.51*
"Other Class A" Water	136,223	229	230	<1%	1.70	1.69	0	0.00	5	0.04
<b>Major Water</b>	<b>1,115,132</b>	<b>4,546</b>	<b>3,856</b>	<b>-15%</b>			<b>211</b>		<b>357</b>	
<b>Average of Rates</b>					<b>3.50</b>	<b>2.97</b>		<b>0.14</b>		<b>0.22</b>

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

2 Estimated based on a probability sample of cases and the number of cases on CSIS as of Aug. 1, 2014.

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

\* Based on a probability sample of cases.

## Appendix G - Table 4

### 2012-13 Residential Payment Agreement Request (PAR) Statistics Major Local Telephone Companies

Company Name	2013 Residential Customers	Residential PARs to BCS			PAR Rates <sup>1</sup>		Justified PARs			
		2012	2013	% Change in #	2012	2013	Numbers <sup>2</sup> / Rates <sup>3</sup> 2012		Numbers <sup>2</sup> / Rates <sup>3</sup> 2013	
CenturyLink	150,048	30	31	3%	0.19	0.21	8	0.05	14	0.09
Frontier Commonwealth	116,588	11	9	-18%	0.09	0.08	3	0.03	2	0.02
Verizon North	209,853	8	9	13%	0.03	0.04	0	0.00	2	0.01
Verizon PA	1,188,096	303	238	-21%	0.21	0.20	9*	0.01*	8*	0.01*
Windstream	106,769	6	6	0%	0.05	0.06	0	0.00	6	0.06
<b>Major Telephone</b>	<b>1,771,354</b>	<b>358</b>	<b>293</b>	<b>-18%</b>			<b>20</b>		<b>32</b>	
<b>Average of Rates</b>					<b>0.12</b>	<b>0.12</b>		<b>0.02</b>		<b>0.04</b>

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

<sup>2</sup> Estimated based on the number of cases on CSIS as of Aug. 1, 2014.

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

\* Based on a probability sample of cases.

# Appendix H – Table 1

## Chapter 56, Chapter 14 and Other Infraction Categories: 2013\*

### Major Electric Distribution Companies

Description	Duquesne		Met-Ed		PECO+		Penelec		Penn Power		PPL		UGI-Electric		West Penn	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Billing and Payment (56.2-Def. of Billing Month, 56.2-Def. of Billing Period, 56.11, 56.15, 56.21, 56.22, 56.24 and 56.25)	1	5%	10	8%	1	1%	3	5%	2	22%	5	15%	0	0%	7	5%
Meter Reading (56.12)	0	0%	44	33%	3	4%	23	38%	1	11%	0	0%	0	0%	85	63%
Make-Up Bills (56.14, 57.24, 59.22 and 65.9 (C))	0	0%	10	8%	1	1%	5	8%	0	0%	4	12%	1	33%	3	2%
Transfer of Accounts (56.16 and Secretarial Letter re: third-party request for service)	0	0%	9	7%	2	3%	7	11%	0	0%	0	0%	0	0%	5	4%
Credit Standards and Deposits (56.31-37, 56.41, 56.42, 56.51 and 56.53)	4	20%	9	7%	4	5%	2	3%	1	11%	2	6%	1	33%	2	1%
Termination Grounds (56.2-Def. of Delinquent Acct., 56.81-83 and 56.100)	2	10%	3	2%	2	3%	2	3%	1	11%	0	0%	0	0%	2	1%
Termination Procedures (56.91-97 and 56.114)	3	15%	3	2%	5	7%	1	2%	0	0%	2	6%	0	0%	1	1%
Reconnection of Service (56.115 and 56.191(a)-(c))	1	5%	1	1%	1	1%	0	0%	0	0%	1	3%	0	0%	1	1%
Liability - Responsibility for Bills (56.2-Def. of Applicant, 56.2-Def. of Customer and 56.191(d)-(e))	1	5%	1	1%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Landlord/Ratepayer (1521-1533)	0	0%	1	1%	2	3%	1	2%	0	0%	0	0%	0	0%	0	0%
Dispute Handling (56.2-Def. of Dispute, 56.141-152 and 56.181)	6	30%	34	26%	48	64%	14	23%	4	44%	19	58%	1	33%	22	16%
Other (56.1, 56.71, 56.202, 57.20 and 1501)	2	10%	8	6%	6	8%	3	5%	0	0%	0	0%	0	0%	6	4%
<b>Total</b>	<b>20</b>		<b>133</b>		<b>75</b>		<b>61</b>		<b>9</b>		<b>33</b>		<b>3</b>		<b>134</b>	

\* # equals the number of verified infractions identified by BCS as of Oct. 28, 2014.  
 % equals the percent of the total number of infractions for a particular company.  
 + PECO statistics include electric and gas.

## Appendix H – Table 2

### Chapter 56, Chapter 14 and Other Infraction Categories: 2013\*

#### Major Natural Gas Distribution Companies

Description	Columbia		Equitable		NFG		Peoples		PGW		UGI – Gas		UGI Penn Natural	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Billing and Payment (56.2-Def. of Billing Month, 56.2-Def. of Billing Period, 56.11, 56.15, 56.21, 56.22, 56.24 and 56.25)	0	0%	3	50%	1	17%	7	14%	6	3%	0	0%	0	0%
Meter Reading (56.12)	0	0%	0	0%	1	17%	13	27%	15	7%	0	0%	0	0%
Make-Up Bills (56.14, 57.24, 59.22 and 65.9 (C))	0	0%	1	17%	0	0%	9	18%	16	8%	0	0%	0	0%
Transfer of Accounts (56.16 and Secretarial Letter re: third-party request for service)	0	0%	0	0%	0	0%	2	4%	4	2%	0	0%	0	0%
Credit Standards and Deposits (56.31-37, 56.41, 56.42, 56.51 and 56.53)	1	25%	0	0%	1	17%	1	2%	10	5%	0	0%	1	20%
Termination Grounds (56.2-Def. of Delinquent Acct., 56.81-83 and 56.100)	0	0%	1	17%	0	0%	0	0%	19	9%	1	25%	0	0%
Termination Procedures (56.91-97 and 56.114)	0	0%	0	0%	0	0%	0	0%	3	1%	0	0%	0	0%
Reconnection of Service (56.115 and 56.191(a)-(c))	0	0%	0	0%	0	0%	0	0%	5	2%	1	25%	1	20%
Liability - Responsibility for Bills (56.2-Def. of Applicant, 56.2-Def. of Customer and 56.191(d)-(e))	0	0%	0	0%	0	0%	0	0%	2	1%	0	0%	0	0%
Landlord/Ratepayer (1521-1533)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	1	20%
Dispute Handling (56.2-Def. of Dispute, 56.141-152 and 56.181)	2	50%	1	17%	2	33%	14	29%	80	40%	1	25%	1	20%
Other (56.1, 56.202 and 1501)	1	25%	0	0%	1	17%	3	6%	41	20%	1	25%	1	20%
<b>Total</b>	<b>4</b>		<b>6</b>		<b>6</b>		<b>49</b>		<b>201</b>		<b>4</b>		<b>5</b>	

\* # equals the number of verified infractions identified by BCS as of Oct. 28, 2014.

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

## Appendix H - Table 3

### Chapter 56, Chapter 14 and Other Infraction Categories: 2013\*

#### Major Water Companies

Description	Aqua		PAWC		"Other Class A"	
	#	%	#	%	#	%
Billing and Payment (56.2-Def. of Billing Month, 56.2-Def. of Billing Period, 56.11, 56.15, 56.21, 56.22, 56.24 and 56.25)	19	15%	16	12%	0	0%
Meter Reading (56.12)	0	0%	0	0%	0	0%
Make-Up Bills (56.14, 57.24, 59.22 and 65.9 (C))	2	2%	2	1%	0	0%
Transfer of Accounts (56.16 and Secretarial Letter re: third-party request for service)	0	0%	4	3%	0	0%
Credit Standards and Deposits (56.31-37, 56.41, 56.42, 56.51 and 56.53)	3	2%	1	1%	0	0%
Termination Grounds (56.2-Def. of Delinquent Acct., 56.81-83 and 56.100)	2	2%	7	5%	0	0%
Termination Procedures (56.91-97 and 56.114)	9	7%	13	10%	1	100%
Reconnection of Service (56.115 and 56.191(a)-(c))	0	0%	5	4%	0	0%
Liability - Responsibility for Bills (56.2-Def. of Applicant, 56.2-Def. of Customer and 56.191(d)-(e))	0	0%	0	0%	0	0%
Landlord/Ratepayer (1521-1533)	2	2%	1	1%	0	0%
Dispute Handling (56.2-Def. of Dispute, 56.141-152 and 56.181)	81	65%	83	61%	0	0%
Other (56.1, 56.71, 56.202 and Tariff)	6	5%	4	3%	0	0%
<b>Total</b>	<b>124</b>		<b>136</b>		<b>1</b>	

\* # equals the number of verified infractions identified by BCS as of Oct. 28, 2014.  
 % equals the percent of the total number of infractions for a particular company.

## Appendix H – Table 4

### Chapter 63 Infraction Categories: 2013\*

#### Major Local Telephone Companies

Description	CenturyLink		Frontier Common- wealth		Verizon North		Verizon PA		Wind- stream	
	#	%	#	%	#	%	#	%	#	%
Complaint Procedures (63.15)	2	29%	5	12%	10	12%	70	10%	12	8%
Service Records (63.22)	0	0%	11	26%	1	1%	24	4%	82	52%
Customer Trouble Reports (63.57)	5	71%	26	60%	69	80%	539	80%	57	36%
Installation of Service (63.58)	0	0%	0	0%	0	0%	0	0%	0	0%
Migration (63.201-221)	0	0%	0	0%	1	1%	20	3%	1	1%
Other (63.21, 63.53 and 63.63)	0	0%	1	2%	5	6%	19	3%	5	3%
<b>Total</b>	<b>7</b>		<b>43</b>		<b>86</b>		<b>672</b>		<b>157</b>	

\* # equals the number of verified infractions identified by BCS as of Sept. 30, 2014.  
 % equals the percent of the total number of infractions for a particular company.

## Appendix H – Table 5

### Chapter 64 Infraction Categories: 2013\*

#### Major Local Telephone Companies

Description	CenturyLink		Frontier Common- wealth		Verizon North		Verizon PA		Wind- stream	
	#	%	#	%	#	%	#	%	#	%
Billing and Payment (64.1, 64.12-14, 64.16 and 64.18-19)	11	28%	7	19%	8	35%	68	28%	2	7%
Slamming and Cramming (64.23)	0	0%	5	14%	0	0%	16	7%	0	0%
Credit and Deposits (64.32-34 and 64.36)	0	0%	0	0%	0	0%	5	2%	1	3%
Suspension and Termination (64.63, 64.71-74, 64.81, 64.121, 64.123, 64.133 and 64.181)	15	38%	7	19%	0	0%	9	4%	10	34%
Dispute Procedures (64.141 and 64.153)	12	31%	16	44%	13	57%	129	54%	12	41%
Other (64.2, 64.52-53 and 64.192)	1	3%	1	3%	2	9%	14	6%	4	14%
<b>Total</b>	<b>39</b>		<b>36</b>		<b>23</b>		<b>241</b>		<b>29</b>	

\* # equals the number of verified infractions identified by BCS as of Sept. 30, 2014.

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

# Consumer Access to the Public Utility Commission

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

**PUC Hotline: 1-800-692-7380 (toll free)**

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

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

Information about the PUC is available on the Internet:

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



Pennsylvania Public Utility Commission

