Utility Consumer Activities Report and Evaluation

2020 & 2021

PENNSYLVANIA PUBLIC UTILITY COMMISSION

PAPUC

Utility Consumer Activities Report and Evaluation 2020 and 2021

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1. Introduction

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

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

The data presented in this report is obtained from informal complaints received by the BCS in 2020 and 2021 concerning the electric, natural gas, water and telecommunications industries under the PUC's jurisdiction. For comparative purposes, the 2020 and 2021 data in this report is presented alongside data from prior years. Where appropriate, some of the data presented in this report is based on a statistically valid sampling of informal complaints and is noted as such throughout the report.

Impact of COVID-19 Pandemic

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

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

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

As shown throughout this report, the pandemic impacted and decreased the number of complaints received in 2020 and 2021 compared to previous years. BCS expects anomalous caseload activity to continue for the next several years and will monitor trends to assess related impacts and recovery efforts.

[1] https://www.governor.pa.gov/wp-content/uploads/2020/03/20200306-COVID19-Digital-Proclamation.pdf

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

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

2. The Bureau of Consumer Services (BCS)

The Pennsylvania PUC's BCS was established by 66 Pa. C.S. § 308. BCS is charged with investigating and issuing final determinations on all informal Consumer Complaints. BCS began investigating and writing decisions on utility Consumer Complaints and service termination complaints in April 1977. Since that time, BCS has resolved nearly 4 million informal complaints.

Informal Complaints Received by BCS

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

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

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

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

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

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

In 2020, BCS received 69,154 contacts from consumers including 13,297 contacts that required further investigation (NFIs). In 2021, BCS received 97,901 contacts from consumers including 28,474 contacts that required further investigation. BCS determined 87% of the 2020 complaints investigated and reviewed were appropriately handled by the subject utilities prior to BCS intervention, and in 2021, 85% were investigated and handled appropriately.

The primary focus of this report is NFI complaints. NFI complaints are categorized as Consumer Complaints and PARs. Consumer Complaints and PARs are taken in by BCS for further investigation. BCS classifies Consumer Complaints as **disputes** related to utility billing, service delivery and repairs, etc. PARs are classified as contacts where the primary request is to establish payment terms.

BCS Management of Informal Complaint Data

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

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

BCS Complaints Appealed

The Public Utility Code provides an appeal process for informal complaint decisions when a complainant does not agree with the outcome or result of a BCS decision or determination. Complainants can file a formal appeal and seek a decision from a presiding officer in the PUC's Office of Administrative Law Judge (OALJ). The following table shows the rate of NFI informal complaints appealed to OALJ and the percentage of BCS informal complaints overturned. The appeal rate is consistently below 2% and the percentage of BCS NFI complaints overturned is less than 1%.

Informal Complaint Appeal Rate

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

BCS Feedback Survey

Through 2021, BCS used a third party to survey a sampling of complainants who have contacted BCS. In a recent internal review of this program, BCS found opportunities to recalibrate the survey process to take advantage of new technology. These changes will ensure that the survey represents a statistically valid sample size and accurately reflects the performance of all related staff. BCS will research comparable surveys for complaint intake and processing and align practices with more current and timely survey methods. According to the survey results on the table that follows, 73% of complainants who contacted BCS in 2020 and 83% in 2021 rated the BCS's service as "excellent" or "good." When asked if they would contact the PUC again for help, those combined ratings were 78% and 85%, respectively. The following table presents additional information about how complainants rated the service they received from BCS in 2018, 2019, 2020 and 2021.

Ratings of BCS Service

How would you rate the service you received from the PUC (BCS)?				
	2018	2019	2020	2021
Excellent	53.8%	48.9%	55.0%	58.4%
Good	22.0%	22.7%	17.5%	24.6%
Fair	12.6%	13.4%	12.8%	8.6%
Poor	11.7%	15.0%	14.8%	8.4%
How quickly did the PUC handle your request?				
	2018	2019	2020	2021
Very quickly	42.8%	38.6%	43.5%	45.0%
Fairly quickly	30.6%	24.7%	25.4%	35.5%
Not very quickly	12.1%	15.7%	12.7%	7.5%
Not at all quickly	10.0%	15.9%	13.9%	5.4%
Don't recall	1.2%	2.3%	2.0%	0.6%
Have not heard from PUC	3.3%	2.9%	2.5%	6.2%
How easy to understand was the information the PUC gave you about the outcome of the problem?				
	2018	2019	2020	2021
Very easy	46.0%	44.9%	41.9%	59.4%
Fairly easy	20.3%	19.1%	20.7%	19.6%
Not very easy	4.1%	3.5%	3.0%	3.6%
Not at all easy	3.4%	2.5%	2.0%	2.1%
Don't recall	3.7%	3.2%	7.7%	1.6%
Did not receive any information	22.5%	26.9%	24.7%	13.7%
How polite was the first person you talked with at the PUC?				
	2018	2019	2020	2021
Very polite	74.2%	74.5%	77.8%	77.8%
Fairly polite	16.1%	15.3%	13.4%	13.6%
Not very polite	2.4%	1.9%	2.1%	1.9%
Not at all polite	2.0%	2.1%	0.5%	0.9%
Don't recall	0.9%	2.1%	1.8%	0.5%
Did not speak to anyone	4.5%	4.3%	4.4%	5.4%
How interested in helping you was the first person you talked with at the PUC?				
	2018	2019	2020	2021
Very interested	64.4%	64.1%	69.1%	71.3%
Fairly interested	20.9%	21.6%	17.1%	17.0%
Not very interested	7.4%	4.6%	8.1%	5.1%
Not at all interested	2.6%	4.3%	1.8%	2.6%
Don't recall	1.1%	1.6%	0.8%	0.6%
Did not speak to anyone	3.7%	4.8%	3.1%	3.5%
If you had another problem with a utility, would you contact the PUC again?				
	2018	2019	2020	2021
Yes	79.4%	81.0%	77.8%	85.0%
No	8.0%	7.2%	10.2%	5.7%
Not sure	12.6%	11.8%	12.0%	9.3%

Complaints Excluded from Analysis by BCS

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

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

Commercial complaints were also excluded from the data used in the analyses. Although BCS's regulatory authority has largely been confined to residential accounts, the Bureau handled 596 complaints from commercial complainants in 2020, including 72 complaints related to loss of utility service. In 2021, BCS handled 1,043 complaints from commercial complainants, including 373 complaints related to loss of utility service.

Mediated Complaints Sent to OALJ from BCS

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

Mediated Complaints Sent to OALJ from BCS

ELECTRIC				
	2018	2019	2020	2021
Duquesne	8	13	12	7
Met-Ed	3	13	10	8
PECO+	10	13	6	3
Penelec	18	7	3	7
Penn Power	5	5	7	5
PPL	10	21	4	3
UGI-Electric	1	3	0	3
West Penn	7	6	5	11
GAS				
	2018	2019	2020	2021
Columbia	0	2	1	0
NFG	0	1	0	1
Peoples	1	0	2	4
Peoples-Equitable*	1	3	n/a	n/a
PGW	6	3	6	18
UGI Gas	6	12	12	4
UGI North**	4	2	n/a	n/a
WATER				
	2018	2019	2020	2021
Aqua	2	5	0	6
PAWC	6	7	14	13
Audubon	0	0	0	0
Columbia	0	0	0	0
Community Utilities	0	0	0	0
Newtown Artesian	0	0	0	0
Veolia Bethel	0	0	0	0
Veolia PA	2	0	2	1
York	0	0	0	0
MUNICIPAL				
	2018	2019	2020	2021
PWSA-Water	5	7	5	4
PWSA-Sewer	2	3	0	0
TELECOMMUNICATIONS				
	2018	2019	2020	2021
CenturyLink	0	1	1	0
Frontier Commonwealth	1	0	0	1
Verizon North	2	1	0	0
Verizon PA	10	19	3	5
Windstream	2	0	1	1

+ PECO statistics include electric and gas.
* Due to the Peoples Natural Gas merger, effective Jan. 1, 2020, the Peoples data includes Peoples-Equitable.
** Due to the UGI Gas merger, effective Jan. 1, 2020, the UGI Gas data includes UGI Central and UGI North.

3. Categories of Residential Consumer Complaints

Total Volume

The following table compares the volume of all residential complaints to the volume of all commercial complaints handled by BCS in 2020 and 2021, and includes the excluded categories mentioned above.

Total Volume of Consumer Complaints and Payment Arrangement Requests (PARs) to BCS in 2020 and 2021*

2020				
Industry	Consumer Complaints		Payment Arrangement Requests	
	Residential	Commercial**	Residential	Commercial**
Electric	4,280	288	2,731	37
Gas	1,299	56	1,421	28
Water	979	76	668	6
Telecommunications	1,238	99	12	1
Other***	48	5	25	0
Total	**7,844**	**524**	**4,857**	**72**
2021				
Industry	Consumer Complaints		Payment Arrangement Requests	
	Residential	Commercial**	Residential	Commercial**
Electric	5,056	365	11,028	216
Gas	1,722	114	5,095	142
Water	1,272	98	1,578	14
Telecommunications	1,566	142	13	0
Other***	41	1	10	1
Total	**9,657**	**720**	**17,724**	**373**

* This table represents "investigated complaints" only, and not those complaints handled on the first call.
** All complaints that involved commercial accounts were deleted from the analyses in the subsequent chapters.
*** Wastewater and steam heat complaints are designated as "other" in this table and the tables that follow.

Consumer Complaints Analyzed by BCS

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

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

Consumer Complaints by Industry*
2018-21

Industry	2018	2019	2020	2021
Electric	9,558	8,007	4,568	5,421
Gas	2,835	2,579	1,355	1,836
Water	1,429	1,194	1,055	1,370
Telecommunications	1,944	1,445	1,337	1,708
Other	105	75	53	42
Total	**15,871**	**13,300**	**8,368**	**10,377**

* Table includes both residential and commercial Consumer Complaints.

As shown in the table above, electric and gas utilities accounted for 71% of all Consumer Complaints investigated by BCS in 2020 and 70% in 2021.

In 2020, 55% of these complaints were electric (4,568 complaints) and 16% of these complaints were natural gas (1,355 complaints), while telecommunications utilities totaled approximately 16% (1,337 complaints), and water utilities accounted for 13% (1,055 complaints).

In 2021, 52% of these complaints were electric (5,421 complaints) and 18% of these complaints were natural gas (1,836 complaints), while telecommunications utilities totaled approximately 16% (1,708 complaints), and water utilities accounted for 13% (1,370 complaints).

The following table presents a comparison of the number of residential and commercial Consumer Complaints for 2018, 2019, 2020 and 2021.

Consumer Complaints to BCS in 2018-21

Industry	Consumer Complaints							
	Residential				Commercial			
	2018	2019	2020	2021	2018	2019	2020	2021
Electric	9,116	7,680	4,280	5,056	442	327	288	365
Gas	2,706	2,455	1,299	1,722	129	124	56	114
Water	1,334	1,106	979	1,272	95	88	76	98
Telecommunications	1,754	1,279	1,238	1,566	190	166	99	142
Other	96	70	48	41	9	5	5	1
Total	**15,006**	**12,590**	**7,844**	**9,657**	**865**	**710**	**524**	**720**

Classification of Consumer Complaints

BCS categorizes residential complaints into 14 categories for each of the electric, gas, and water utilities and 11 categories for each of the telecommunications utilities. Tables showing the percent of complaints in each category appear in the following industry chapters. The tables represent all of the complaints that were evaluated by BCS staff. BCS analyzes the categories that generate the most complaints or problems and often discusses its findings with individual utilities and works with them to make necessary revisions to their complaint handling procedures.

Payment Arrangement Requests

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

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

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

[4] 66 Pa. C.S. §§1401-1418
[5] 66 Pa. C.S. §1402
[6] Small natural gas distribution utilities may voluntarily "opt in" to Chapter 14. 66 Pa. C.S. §1403.
[7] Docket No. L-2015-2508421, published in Pennsylvania Bulletin June 1, 2019.
[8] http://www.puc.pa.gov/general/publications_reports/pdf/Chapter14-Biennial013020.pdf

next report is due in December 2024, the same year the general assembly must renew Chapter 14 before it expires.

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

All of the measures in this report pertaining to PARs are based on assessments of contacts to BCS from individual complainants. As with Consumer Complaints, almost all complainants contacted their utility prior to contacting BCS. During 2020, BCS handled 4,929 PARs and 18,097 PARs in 2021 from customers of the utilities under the Commission's jurisdiction.

Payment Arrangement Requests (PARs) by Industry*
2018-21

Industry	2018	2019	2020	2021
Electric	31,448	30,055	2,768	11,244
Gas	13,037	12,054	1,449	5,237
Water	4,185	3,628	674	1,592
Telecommunications	36	23	13	13
Other	91	51	25	11
Total	**48,797**	**45,811**	**4,929**	**18,097**

* Table includes both residential and commercial PARs.

As in past years, most requests for payment arrangements in 2020 and 2021 involved electric or gas utilities. As shown in the table above, 56% (2,768 complaints) of PARs in 2020 and 62% (11,244 complaints) of PARs in 2021 were from electric customers, and 29% (1,449 complaints) in 2020 and 29% (5,237 complaints) in 2021 were from gas customers. Also, 14% (674 complaints) of PARs in 2020 and 9% (1,592 complaints) in 2021 came from customers of various water utilities. Less than 1% (13 complaints) of PARs in 2020 and less than 1% (13 complaints) in 2021 came from telecommunications customers. The following table presents a comparison of the number of residential and commercial Consumer Complaints for 2018, 2019, 2020 and 2021.

Payment Arrangement Requests (PARs) to BCS in 2018-21

Industry	Payment Arrangement Requests							
	Residential				Commercial			
	2018	2019	2020	2021	2018	2019	2020	2021
Electric	31,299	29,907	2,731	11,028	149	148	37	216
Gas	12,912	11,931	1,421	5,095	125	123	28	142
Water	4,145	3,604	668	1,578	40	24	6	14
Telecommunications	36	23	12	13	0	0	1	0
Other	91	49	25	10	0	2	0	1
Total	**48,483**	**45,514**	**4,857**	**17,724**	**314**	**297**	**72**	**373**

First Contact Resolution (FCR) Complaints

Formerly labeled as "Inquiries," the total number of FCRs BCS received in 2020 was 8,956 and in 2021 was 11,691. FCRs are contacts that did not require follow-up investigation beyond the initial contact or call-back. The FCRs for 2020 and 2021 include contacts to the BCS via the Consumer Complaint Hotline, mail, website, fax and email.

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

As previously mentioned, BCS reclassified some contacts that originated as NFIs into the General Inquiry (GI) category. The GIs are excluded from analysis within this report. They are not counted as informal complaints. Reclassified GIs (388 complaints in 2020 and 760 in 2021) accounted for 4% and 7% of FCRs in 2020 and 2021, respectively, and are included in the tables below.

FCR Reason for Contact Categories in 2020

Reason for Contact	Number	Percent*
PUC has no jurisdiction	1,521	17.0%
Termination or suspension of service	1,341	15.0%
Competition issues and requests for information	1,145	12.8%
Billing dispute	807	9.0%
Request for general information	705	7.9%
Unable to open new PAR – service on	607	6.8%
People-delivered utility service**	321	3.6%
Service (utility facilities)	263	2.9%
Applicant/deposit issue	245	2.7%
CAP inquiry/contact	235	2.6%
Rate protest	229	2.6%
Unable to open new PAR – service off	73	0.8%
Weather outage	58	0.7%
Rate complaint	7	0.1%
Cramming**	3	0.0%
Slamming**	2	0.0%
Other miscellaneous reasons***	1,026	11.5%
Reason for contact is not available	368	4.1%
Total	**8,956**	**100.1%**

* Total percent may be more or less than 100% due to rounding.
** Please refer to the Glossary of Terms.
*** Some of the Other category includes contacts related to Sales Issues, Lifeline/Link-up, Healthcare facilities, etc.

FCR Reason for Contact Categories in 2021

Reason for Contact	Number	Percent*
PUC has no jurisdiction	1,908	16.3%
Termination or suspension of service	1,899	16.2%
Request for general information	1,512	12.9%
Billing dispute	875	7.5%
Competition issues and requests for information	834	7.1%
Service (utility facilities)	413	3.5%
Unable to open new PAR – service on	372	3.2%
Applicant/deposit issue	363	3.1%
CAP inquiry/contact	355	3.0%
People-delivered utility service**	336	2.9%
Rate protest	229	2.0%
Unable to open new PAR – service off	82	0.7%
Weather outage	19	0.2%
Rate complaint	14	0.1%
Cramming**	0	0.0%
Slamming**	4	0.0%
Other miscellaneous reasons***	1,369	11.7%
Reason for contact is not available	1,107	9.5%
Total	**11,691**	**99.9%**

* Total percent may be more or less than 100% due to rounding.
** Please refer to the Glossary of Terms.
*** Some of the Other category includes contacts related to Sales Issues, Lifeline/Link-up, Healthcare facilities, etc.

4. Commodity Supplier Activity

Electric and Natural Gas Supplier Activity

Deregulation of the electric and natural gas supply industries occurred in Pennsylvania through the passage and enactment of the Electricity Generation Customer Choice and Competition Act in 1996 and the Natural Gas Choice and Competition Act in 1999. Prior to the enactment of these laws, customers in Pennsylvania procured their electricity and/or natural gas from utility companies that generated, transmitted and distributed the energy to the customer. Under energy competition, consumers in Pennsylvania have the choice to purchase electricity and/or natural gas from a supplier that is a different company than the utility; thereby allowing the consumer to choose their energy supply based on several factors, including price, or in the case of electricity, by the source of the power supplied to the customer. Currently, Pennsylvania has a robust competitive energy supply market, with over 460 electric generation suppliers and over 330 natural gas suppliers licensed with the Commission. In 2020, over 1.4 million residential electric customers and over 390,000 natural gas customers were served by competitive suppliers. In 2021, over 1.3 million residential electric customers and over 338,000 natural gas customers were served by competitive suppliers.

As indicated in the following table, in 2020 and 2021, BCS received 2,660 and 2,248 contacts, respectively, related to competitive supplier issues in the energy industries.

All Competition-Related Contacts by Industry 2018-21

Industry	2018	2019	2020	2021
Electric	3,980	3,490	2,353	1,954
Gas	387	454	307	294
Total	**4,367**	**3,944**	**2,660**	**2,248**

Of the 2,660 total contacts received about competitive supplier issues in 2020, 830 or 31% pertained to slamming; in 2021, 826 or 37% pertained to slamming. Slamming is the illegal practice of switching a customer's supplier or provider without permission. The following table presents the number of slamming NFI complaints received by BCS.

Slamming NFIs (Consumer Complaints and PARs) by Industry 2018-21

Industry	2018		2019		2020		2021	
	Residential	Commercial	Residential	Commercial	Residential	Commercial	Residential	Commercial
Electric	895	35	912	50	562	44	533	60
Gas	80	3	102	1	76	3	87	7
Total	**975**	**38**	**1,014**	**51**	**638**	**47**	**620**	**67**

There were 685 NFI complaints about slamming in 2020. Residential consumers filed 638 NFI complaints or 93%, commercial consumers filed the remaining 47 or 7% of slamming NFIs. Of the residential slamming NFIs, 606 were from the electric industry and 79 were from the natural gas industry.

In 2021, there were 687 NFI complaints about slamming. Residential consumers filed 620 NFI complaints or 90%, commercial consumers filed the remaining 67 or 10% of slamming NFIs. Of the residential slamming NFIs, 593 were from the electric industry and 94 were from the natural gas industry.

The Commission views slamming as a very serious violation of consumer regulations and has articulated a "zero tolerance" policy against slamming.[9]

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

[9] L-00970121, Public Meeting of May 21, 1998.

5. Residential Consumer Complaints from Non-Major Utilities

Residential Consumer Complaints for Non-Major Utilities

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

Utilities are considered a major utility in the following circumstances. A major electric utility is an EDC with more than 100,000 residential customers. A major gas utility is an NGDC with than 100,000 residential customers. A major water utility is a Class A Water utility with annual revenues of $1 million or more for three consecutive years. A major telecommunications utility is an Incumbent Local Exchange Carrier (ILEC) that served over 50,000 residential customers; the major local telecommunications utilities provided voice telecommunications service to the vast majority of the telecommunications access service lines.

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

In 2020, BCS observed a decrease in the overall number of residential Consumer Complaints for the non-major utilities, with the exception of the non-major telecommunication utilities. In 2021, the gas and telecommunications industries increased, while the electric and water industry decreased.

Residential Consumer Complaints by Industry for Non-Major Utilities*
2018-21

Industry	2018	2019	2020	2021
Electric	1,768	1,690	1,188	1,028
Gas	358	381	210	228
Water	33	31	27	22
Telecommunications	159	87	134	145
Total	**2,318**	**2,189**	**1,559**	**1,423**

*See Appendix C

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

- 77% in 2020 and 47% in 2021 non-major electric utility complaints
- 79% in 2020 and 41% in 2021 non-major gas utility complaints
- 33% in 2020 and 32% in 2021 non-major water utility complaints
- 12% in 2020 and 11% in 2021 non-major telecommunications utility complaints

Appendix C presents a summary of the residential informal complaints (Consumer Complaints and PARs) that are not included in the analysis within the electric, gas, water and telecommunications chapters. The table lists the non-major utilities for these industries, the electric generation and natural gas suppliers and providers of telecommunications services that had five or more residential Consumer Complaints in 2020 and 2021.

6. Performance Measures

Informal complaints are an indicator of utility complaint-handling performance. Utility customers are required to contact their utility about a problem prior to contacting BCS. BCS reviews utility records to evaluate the handling of each complaint. The informal compliance evaluation process includes several assessments that form the basis of the performance measures presented in the industry chapters of this report[10], with the exception of the number of terminations and termination rate. Many of the performance measures are shown as rates, calculated per 1,000 residential customers. Appendix A provides the number of residential customers for the major companies in each of the industries in 2018, 2019, 2020 and 2021.

Informal Compliance Process and Infractions

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

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

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

Total Complaint Rate

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

Consumer Complaint Rate

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

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

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

Justified Consumer Complaint Rate

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

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

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

Percent of Justified Consumer Complaints

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

Response Time to Consumer Complaints

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

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

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

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

Payment Arrangement Request (PAR) Rate

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

Justified Payment Arrangement Request (PAR) Rate

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

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

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

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

Percent of Justified Payment Arrangement Requests (PARs)

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

Response Time to Payment Arrangement Requests

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

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

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

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

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

Termination Rate

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

BCS views termination of utility service as a utility's last resort when customers fail to meet their payment obligations. The "termination rate" allows the reader to compare termination activity between utilities. For the electric, gas and water industries, the termination rate is the number of service terminations divided by the number of residential customers. For the telecommunications industry, the termination rate is the number of terminations for each 1,000 residential customers.

Infraction Rate

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

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

This compliance measure shows industry trends over time. Generally, trends may change as complaints for that year continue to be evaluated into the new year, and utilities may subsequently challenge a BCS determination. For example, complaints closed in November and December may not be evaluated by BCS until the new year, and utilities may subsequently challenge BCS infractions. Thus, the total number of infractions for the year may change from the number cited in the current report. BCS will update the 2020 and 2021 infraction rates in the 2022 report.

Infraction rates are shown for 2018, 2019, 2020 and 2021 in the upcoming industry chapters. The electric, gas, and water industry chapters show the 2020 and 2021 infractions of Chapter 56, Chapter 14 and other regulations, and the telecommunications industry chapter shows the infractions of Chapters 30, 63, 64 and other regulations.

BCS Performance Measures and Industry Chapters

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

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

Universal service and energy conservation programs help utility customers maintain service and conserve energy. While not a performance measure that is reviewed during the compliance evaluation process, BCS monitors and evaluates these programs to help the Commission fulfill its oversight

responsibilities, increasing the effectiveness of utility collections while protecting the public's health and safety.

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

In November 2021, the Commission released the 21st annual report on Universal Service Programs and Collections Performance, which presents 2020 universal service and collections data for the major electric and natural gas distribution companies. In December 2022, the Commission released the 22nd annual report on Universal Service Programs and Collections Performance, which presents 2021 universal service and collections data for the major electric and natural gas distribution companies. These reports are available on the Commission's website at: https://www.puc.pa.gov/filing-resources/reports/universal-service-reports/

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

7. Electric Industry

In 2020 and 2021, the Commission had jurisdiction over 15 electric distribution companies (EDCs). The majority of Consumer Complaints and PARs are about the seven major EDCs: Duquesne Light Co. (**Duquesne**), PECO Energy Co. (**PECO**), PPL Electric Utilities Inc. (**PPL**), and the four FirstEnergy companies – Metropolitan Edison Co. (**Met-Ed**), Pennsylvania Electric Co. (**Penelec**), Pennsylvania Power Co. (**Penn Power**), and West Penn Power Co. (**West Penn**). This chapter will focus exclusively on those seven utilities.

The statistics in the tables on the pages that follow depict the performance of each of the seven major electric utilities in 2020 and 2021. The major electric utilities are those that have more than 100,000 residential customers. The tables in this chapter also include UGI-Electric, a large non-major EDC with fewer than 100,000 residential customers. In some circumstances, statistics for the non-major utilities can skew the industry averages in ways that do not fairly represent industry performance. For this reason, BCS excluded the statistics involving UGI-Electric when it calculated the electric industry averages. PECO's statistics include data for both electric and gas service. BCS also removed supplier complaints from the data it used to prepare the tables on Consumer Complaints and PARs and addresses these complaints in a separate section of the report.

Total Complaint Rate

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

2018-21 Residential Total Complaint Numbers/Rates
Major Electric Distribution Companies

Utility	2018		2019		2020		2021	
	Number	Rate	Number	Rate	Number	Rate	Number	Rate
Duquesne	4,106	7.67	3,166	5.88	843	1.56	2,612	4.81
Met-Ed	6,859	13.66	6,156	12.20	1,210	2.38	2,132	4.16
PECO+	11,046	7.40	11,000	7.31	2,309	1.52	4,338	2.83
Penelec	6,937	13.83	6,642	13.26	1,107	2.21	2,242	4.47
Penn Power	1,823	12.55	1,918	13.14	284	1.93	594	4.01
PPL	13,143	10.71	10,906	8.84	1,807	1.45	4,464	3.57
UGI-Electric	720	13.04	825	14.96	191	3.47	278	5.05
West Penn	7,510	11.99	7,414	11.82	1,223	1.94	2,433	3.85
Total	**52,144**		**48,027**		**8,974**		**19,093**	
Average of Rates*		**10.22**		**9.33**		**1.86**		**3.68**

* Does not include UGI-Electric.
+ PECO statistics include electric and gas.

Consumer Complaints

During 2020, BCS handled 4,280 Consumer Complaints from residential consumers of the various EDCs (3,094) and EGSs (1,186). The seven major EDCs represented 71% (3,059) of the total Consumer Complaints.

During 2021, BCS handled 5,056 Consumer Complaints from residential customers of the various EDCs (4,029) and EGSs (1,027). The seven major EDCs represented 79% (3,984) of the total Consumer Complaints.

Consumer Complaint Categories

The following tables show the number and percentage of 2020 and 2021 complaints in each of the 14 categories used by BCS policy analysts for compliance evaluation.

Number of Consumer Complaints by Dispute Category
2020 Complaints Evaluated*
Major Electric Distribution Companies

Categories	Duquesne	Met-Ed**	PECO+**	Penelec **	Penn Power	PPL**	UGI-Electric	West Penn**	Electric Total
Billing Disputes	75	70	145	84	23	96	11	80	**584**
Service Interruptions	33	51	122	50	10	16	0	70	**352**
Personnel Problems	31	54	64	51	8	27	4	66	**305**
Service Quality	21	60	48	30	2	27	2	48	**238**
Discontinuance/ Transfer	25	27	38	20	9	40	3	28	**190**
Credit and Deposits	20	47	15	43	12	12	2	36	**187**
Damages	6	19	31	5	3	4	0	45	**113**
Other Payment Issues	19	21	12	16	5	12	0	13	**98**
Termination or PAR Procedures	10	9	21	10	2	25	2	11	**90**
Service Extensions	9	17	5	9	0	1	0	5	**46**
Scheduling Delays	2	9	5	9	1	3	0	9	**38**
Metering	1	5	7	4	1	11	0	6	**35**
Rates	1	4	2	1	1	0	0	2	**11**
All Other Problems	13	16	16	23	4	9	3	18	**102**
Total-Number*	**266**	**409**	**531**	**355**	**81**	**283**	**27**	**437**	**2,389**

* Based on residential complaints opened in 2020 and evaluated by BCS as of June 4, 2021.
** Based on a probability sample of complaints.
\+ PECO statistics include electric and gas.

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

Number of Consumer Complaints by Dispute Category
2021 Complaints Evaluated*
Major Electric Distribution Companies

Categories	Duquesne	Met-Ed**	PECO+**	Penelec **	Penn Power	PPL**	UGI-Electric	West Penn**	Electric Total
Billing Disputes	95	94	124	67	19	81	15	64	**559**
Discontinuance/ Transfer	41	25	106	46	20	62	5	47	**352**
Personnel Problems	49	60	50	65	14	45	1	58	**342**
Service Interruptions	56	38	15	59	2	30	1	76	**277**
Termination or PAR Procedures	64	36	59	38	8	35	5	27	**272**
Service Quality	16	38	42	35	1	35	4	39	**210**
Credit and Deposits	12	39	14	43	15	2	1	39	**165**
Other Payment Issues	36	19	31	24	5	34	2	13	**164**
Damages	7	14	36	12	5	8	1	35	**118**
Metering	15	17	17	12	4	24	2	5	**96**
Service Extensions	6	12	7	5	0	6	1	12	**49**
Scheduling Delays	4	5	5	8	1	4	0	9	**36**
Rates	3	2	1	4	2	5	0	1	**18**
All Other Problems	36	16	41	22	4	29	0	28	**176**
Total-Number*	**440**	**415**	**548**	**440**	**100**	**400**	**38**	**453**	**2,834**

* Based on residential complaints opened in 2021 and evaluated by BCS as of Sept. 10, 2022.
** Based on a probability sample of complaints.
+ PECO statistics include electric and gas.

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

Percent of Consumer Complaints by Dispute Category
2020 Complaints Evaluated*
Major Electric Distribution Companies

Categories	Duquesne	Met-Ed**	PECO+**	Penelec **	Penn Power	PPL**	UGI-Electric	West Penn**	Electric Average ***
Billing Disputes	28%	17%	27%	24%	28%	34%	41%	18%	**24%**
Service Interruptions	12%	12%	23%	14%	12%	6%	0%	16%	**15%**
Personnel Problems	12%	13%	12%	14%	10%	10%	15%	15%	**13%**
Service Quality	8%	15%	9%	9%	2%	10%	7%	11%	**10%**
Discontinuance/ Transfer	9%	7%	7%	6%	11%	14%	11%	6%	**8%**
Credit and Deposits	8%	11%	3%	12%	15%	4%	7%	8%	**8%**
Damages	2%	5%	6%	1%	4%	1%	0%	10%	**5%**
Other Payment Issues	7%	5%	2%	5%	6%	4%	0%	3%	**4%**
Termination or PAR Procedures	4%	2%	4%	3%	2%	9%	7%	3%	**4%**
Service Extensions	3%	4%	1%	3%	0%	<1%	0%	1%	**2%**
Scheduling Delays	1%	2%	1%	3%	1%	1%	0%	2%	**2%**
Metering	<1%	1%	1%	1%	1%	4%	0%	1%	**1%**
Rates	<1%	1%	<1%	<1%	1%	0%	0%	<1%	**<1%**
All Other Problems	5%	4%	3%	6%	5%	3%	11%	4%	**4%**
Total-Number*	**266**	**409**	**531**	**355**	**81**	**283**	**27**	**437**	**2,389**

* Based on residential complaints opened in 2020 and evaluated by BCS as of June 4, 2021.
** Based on a probability sample of complaints.
*** Electric Average does not include UGI-Electric.
\+ PECO statistics include electric and gas.

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

- Of the 2,362 Consumer Complaints evaluated, the top three categories of EDC complaints for 2020 account for over half (52%) of the total: 24% billing disputes, 15% service interruptions, and 13% personnel problems.

Percent of Consumer Complaints by Dispute Category
2021 Complaints Evaluated*
Major Electric Distribution Companies

Categories	Duquesne	Met-Ed**	PECO+**	Penelec **	Penn Power	PPL**	UGI-Electric	West Penn**	Electric Average ***
Billing Disputes	22%	23%	23%	15%	19%	20%	39%	14%	**19%**
Discontinuance/ Transfer	9%	6%	19%	10%	20%	16%	13%	10%	**12%**
Personnel Problems	11%	14%	9%	15%	14%	11%	3%	13%	**12%**
Service Interruptions	13%	9%	3%	13%	2%	8%	3%	17%	**10%**
Termination or PAR Procedures	15%	9%	11%	9%	8%	9%	13%	6%	**10%**
Service Quality	4%	9%	8%	8%	1%	9%	11%	9%	**7%**
Credit and Deposits	3%	9%	3%	10%	15%	1%	3%	9%	**6%**
Other Payment Issues	8%	5%	6%	5%	5%	9%	5%	3%	**6%**
Damages	2%	3%	7%	3%	5%	2%	3%	8%	**4%**
Metering	3%	4%	3%	3%	4%	6%	5%	1%	**3%**
Service Extensions	1%	3%	1%	1%	0%	2%	3%	3%	**2%**
Scheduling Delays	1%	1%	1%	2%	1%	1%	0%	2%	**1%**
Rates	1%	<1%	<1%	1%	2%	1%	0%	<1%	**1%**
All Other Problems	8%	4%	7%	5%	4%	7%	0%	6%	**6%**
Total-Number*	**440**	**415**	**548**	**440**	**100**	**400**	**38**	**453**	**2,796**

* Based on residential complaints opened in 2020 and evaluated by BCS as of Sept. 10, 2022.
** Based on a probability sample of complaints.
*** Electric Average does not include UGI-Electric.
\+ PECO statistics include electric and gas.

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

- Of the 2,796 Consumer Complaints evaluated for 2021, excluding UGI-Electric, the top three categories of EDC complaints for 2021 account for 43% of the total: 19% billing disputes, 12% discontinuance/transfer, and 12% personnel problems.

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

The following tables show the Consumer Complaint Rate, the Justified Consumer Complaint Rate, and the Percent of Justified Consumer Complaints. The Consumer Complaint rate is the number of Consumer Complaints for each 1,000 residential customers. The justified Consumer Complaint rate is the estimated number of justified Consumer Complaints for each 1,000 residential customers based on a statistically valid sampling of complaints. A complaint is considered "justified" if it is found that the utility did not comply with Commission Orders, policies, regulations, reports, Secretarial Letters, or tariffs. The percent of justified Consumer Complaints is the estimated number of justified complaints divided by the total number of complaints received (multiplied by 100). BCS evaluates a statistically valid sampling of complaints for each utility.

2020 and 2021 Residential Consumer Complaint Rate, Justified Consumer Complaint Rates, and Percent of Justified Consumer Complaints Major Electric Distribution Companies

Utility	Consumer Complaint Rate	Justified Consumer Complaint Rate	Percent of Justified Consumer Complaints
2020			
Duquesne	0.63	0.07	10.5%
Met-Ed	0.86	0.06	6.4%
PECO+	0.59	0.03*	4.4%
Penelec	0.78	0.06	7.9%
Penn Power	0.64	0.04	6.4%
PPL	0.33	0.02	7.3%
UGI-Electric	0.60	0.04	6.1%
West Penn	0.78	0.04	5.5%
Average**	**0.66**	**0.05**	**6.4%**
2021			
Duquesne	1.04	0.12	11.2%
Met-Ed	0.97	0.10	10.6%
PECO+	0.75	0.06	7.7%
Penelec	1.04	0.10	9.4%
Penn Power	0.80	0.04	5.1%
PPL	0.45	0.03	6.5%
UGI-Electric	0.80	0.13	15.9%
West Penn	0.90	0.04	4.4%
Average**	**0.85**	**0.07**	**8.1%**

* Justified Consumer Complaint rate based on a probability sample of complaints.
** Does not include UGI-Electric.
+ PECO statistics include electric and gas.

- The justified Consumer Complaint rate is a normalized ratio useful for comparing utility performance among the various companies. It is not a percentage.
- The percent of justified Consumer Complaints represents a utility's individual performance.
- The following table presents the number of Consumer Complaints and Consumer Complaint rate for each major EDC in 2018, 2019, 2020, and 2021.

2018-21 Residential Consumer Complaint Numbers/Rates
Major Electric Distribution Companies

Utility	2018		2019		2020		2021	
	Number	Rate	Number	Rate	Number	Rate	Number	Rate
Duquesne	596	1.11	559	1.04	342	0.63	565	1.04
Met-Ed	1,185	2.36	798	1.58	436	0.86	499	0.97
PECO+	1,869	1.25	1,753	1.16	894	0.59	1,147	0.75
Penelec	938	1.87	715	1.43	392	0.78	522	1.04
Penn Power	255	1.76	187	1.28	94	0.64	118	0.80
PPL	1,146	0.93	915	0.74	409	0.33	566	0.45
UGI-Electric	76	1.38	105	1.90	33	0.60	44	0.80
West Penn	1,283	2.05	958	1.53	492	0.78	567	0.90
Total	**7,348**		**5,990**		**3,092**		**4,028**	
Average of Rates*		**1.62**		**1.25**		**0.66**		**0.85**

* Does not include UGI-Electric.
+ PECO statistics include electric and gas.

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

2018-21 Justified Residential Consumer Complaint Numbers/Rates
Major Electric Distribution Companies

Utility	2018		2019		2020		2021	
	Number**	Rate	Number**	Rate	Number**	Rate	Number**	Rate
Duquesne	76	0.14	66	0.12	36	0.07	63*	0.12
Met-Ed	102*	0.20	54*	0.11	28	0.06	53	0.10
PECO+	237*	0.16	77*	0.05	39*	0.03	88*	0.06
Penelec	49*	0.10	43*	0.09	31	0.06	49*	0.10
Penn Power	22	0.15	11	0.08	6	0.04	6	0.04
PPL	109*	0.09	74*	0.06	30	0.02	37	0.03
UGI-Electric	15	0.27	15	0.27	2	0.04	7	0.13
West Penn	98*	0.16	57*	0.09	27	0.04	25*	0.04
Total	**708**		**397**		**199**		**328**	
Average of Rates* **		**0.14**		**0.08**		**0.05**		**0.07**

* Based on a probability sample of complaints.
** Estimated based on the number of complaints in CSIS: 2018 as of June 21, 2019; 2019 as of July 10, 2020; 2020 as of June 4, 2021; and 2021 as of Sept. 10, 2022.
*** Does not include UGI-Electric.
\+ PECO statistics include electric and gas.

- The justified Consumer Complaint rate is a normalized ratio useful for comparing utility performance among the various companies. It is not a percentage.

- In 2020, the justified Consumer Complaint rates decreased for the major EDCs. In 2021, the rates for Penn Power and West Penn remained stable, while the rates increased for Duquesne, Met-Ed, PECO, Penelec, PPL and UGI-Electric.

- The following table presents the percent of justified Consumer Complaints for each major EDC in 2018, 2019, 2020 and 2021.

2018-21 Number/Percent of Justified Residential Consumer Complaints
Major Electric Distribution Companies

Utility	2018		2019		2020		2021	
	Number**	Percent	Number**	Percent	Number**	Percent	Number**	Percent
Duquesne	76	12.8%	66	11.8%	36	10.5%	63*	11.2%
Met-Ed	102*	8.6%	54*	6.8%	28	6.4%	53	10.6%
PECO+	237*	12.7%	77*	4.4%	39*	4.4%	88*	7.7%
Penelec	49*	5.2%	43*	6.0%	31	7.9%	49*	9.4%
Penn Power	22	8.6%	11	5.9%	6	6.4%	6	5.1%
PPL	109*	9.5%	74*	8.1%	30	7.3%	37	6.5%
UGI-Electric	15	19.7%	15	14.3%	2	6.1%	7	15.9%
West Penn	98*	7.6%	57*	5.9%	27	5.5%	25*	4.4%
Total	**708**		**397**		**199**		**328**	
Average* **		**9.5%**		**6.5%**		**6.4%**		**8.1%**

* Based on a probability sample of complaints.
** Estimated based on the number of complaints in CSIS: 2018 as of June 21, 2019; 2019 as of July 10, 2020; 2020 as of June 4, 2021; and 2021 as of Sept. 10, 2022.
*** Does not include UGI-Electric.
\+ PECO statistics include electric and gas.

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

2018-21 Average Response Time to BCS Residential Consumer Complaints Major Electric Distribution Companies

Utility	Number of Days			
	2018	2019	2020	2021
Duquesne	9.0	12.0	12.4	14.3
Met-Ed	13.6	15.8	11.8	15.4
PECO+	17.4	18.6	17.7	16.6
Penelec	12.9	16.6	12.1	14.3
Penn Power	12.1	16.2	12.4	14.7
PPL	13.8	18.9	17.3	19.0
UGI-Electric	17.9	14.3	9.0	8.2
West Penn	12.8	15.6	11.2	14.8
Average*	**13.6**	**16.6**	**13.8**	**15.7**

* Does not include UGI-Electric
+ PECO statistics include electric and gas.

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

- West Penn and Met-Ed had the shortest Consumer Complaint response times in 2020, while PECO and PPL took the most time to respond. In 2021, Duquesne, Penelec and UGI-Electric had the shortest Consumer Complain response times, while PPL took the most time to respond.

Payment Arrangement Requests

During 2020, BCS handled 2,731 PARs from residential electric customers of the various EDCs (2,634) and EGSs (97). The seven major EDCs represented 92% (2,518) of the total PARs. During 2021, BCS handled 11,028 PARs from residential electric consumers of the various EDCs (10,961) and EGSs (67). The seven major EDCs represented 98% (10,784) of the total PARs.

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

The following tables show the PAR Rate, the Justified PAR Rate, and the Percent of Justified PARs. The PAR rate is the number of PARs for each 1,000 residential customers. The justified PAR rate is the estimated number of justified PARs for each 1,000 residential customers based on a statistically valid sampling of complaints. A complaint is considered "justified" if it is found that the utility did not comply with Commission Orders, policies, regulations, reports, Secretarial Letters, or tariffs. The percent of justified PARs is the estimated number of justified complaints divided by the total number of complaints received (multiplied by 100). BCS evaluates a statistically valid sampling of complaints for each utility.

2020 and 2021 Residential Payment Arrangement Request (PAR) Rates, Justified PAR Rates, and Percent of Justified PARs
Major Electric Distribution Companies

Utility	PAR Rate	Justified PAR Rate	Percent of Justified PARs
2020			
Duquesne	0.31	0.01	4.1%
Met-Ed	0.61	0.07	11.9%
PECO+	0.40	0.02	3.9%
Penelec	0.66	0.06	8.7%
Penn Power	0.67	0.05	7.1%
PPL	0.57	0.03	6.1%
UGI-Electric	2.04	0.15	7.1%
West Penn	0.46	0.07	14.5%
Average*	**0.53**	**0.04**	**7.5%**
2021			
Duquesne	2.80	0.60	21.5%
Met-Ed	2.32	0.34	14.8%
PECO+	1.39	0.22	15.9%
Penelec	2.60	0.30	11.7%
Penn Power	2.50	0.34	13.5%
PPL	2.31	0.27	11.6%
UGI-Electric	3.18	0.34	10.9%
West Penn	2.19	0.26	11.8%
Average*	**2.30**	**0.33**	**14.3%**

+ PECO statistics include electric and gas.
* Does not include UGI-Electric

- The PAR rate equals the number of PARs for each 1,000 residential customers.
- The justified PAR rate equals the estimated number of justified PARs for each 1,000 residential customers. The justified rate is a normalized ratio useful for comparing utility performance among the various companies.
- The percent of justified PARs is the estimated number of justified complaints divided by the total number of complaints received. (BCS evaluates a statistically valid sampling of complaints for each utility.)
- The following table presents the number of PARs and the PAR rate for each major EDC in 2018, 2019, 2020 and 2021.

2018-21 Residential Payment Arrangement Request (PAR) Numbers/Rates
Major Electric Distribution Companies

Utility	2018		2019		2020		2021	
	Number	Rate	Number	Rate	Number	Rate	Number	Rate
Duquesne	2,178	4.07	1,755	3.26	169	0.31	1,523	2.80
Met-Ed	3,865	7.07	3,711	7.35	312	0.61	1,186	2.32
PECO+	6,349	4.25	6,696	4.45	610	0.40	2,126	1.39
Penelec	4,061	8.10	4,048	8.08	332	0.66	1,304	2.60
Penn Power	1,091	7.51	1,212	8.30	99	0.67	370	2.50
PPL	9,084	7.40	7,413	6.01	707	0.57	2,893	2.31
UGI-Electric	469	8.49	549	9.96	112	2.04	175	3.18
West Penn	4,010	6.40	4,286	6.83	289	0.46	1,382	2.19
Total	**31,107**		**29,670**		**2,630**		**10,959**	
Average of Rates*		**6.49**		**6.33**		**0.53**		**2.30**

* Does not include UGI-Electric.
+ PECO statistics include electric and gas.

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

2018-21 Justified Residential Payment Arrangement Request (PAR) Numbers/Rates
Major Electric Distribution Companies

Utility	2018		2019		2020		2021	
	Number**	Rate	Number**	Rate	Number**	Rate	Number**	Rate
Duquesne	198*	0.37*	208*	0.39*	7	0.01	328*	0.60
Met-Ed	418*	0.83*	507*	1.00*	37	0.07	175*	0.34
PECO+	933*	0.63*	1,142*	0.76*	24	0.02	338*	0.22
Penelec	547*	1.09*	521*	1.04*	29	0.06	153*	0.30
Penn Power	147*	1.01*	150*	1.03*	7	0.05	50	0.34
PPL	1,014*	0.83*	749*	0.61*	43	0.03	335*	0.27
UGI-Electric	57	1.03	74	1.34	8	0.15	19	0.34
West Penn	355*	0.57*	523*	0.83*	42	0.07	163*	0.26
Average of Rates* **	**3,669**		**3,874**		**197**		**1,561**	
Total		**0.76**		**0.81**		**0.04**		**0.33**

* Based on a probability sample of complaints.
** Estimated based on the number of complaints in CSIS: 2018 as of June 21, 2019; 2019 as of July 10, 2020; 2020 as of June 4, 2021; and 2021 as of Sept. 10, 2022.
*** Does not include UGI-Electric.
\+ PECO statistics include electric and gas.

- The justified PAR rate equals the estimated number of justified PARs for each 1,000 residential customers. It is not a percentage.

- The following table presents the percent of justified PARs for each major EDC in 2018, 2019, 2020 and 2021.

2018-21 Number/Percent of Justified Residential Payment Arrangement Requests (PARs) Major Electric Distribution Companies

Utility	2018		2019		2020		2021	
	Number**	Percent	Number**	Percent	Number**	Percent	Number**	Percent
Duquesne	198*	9.1%	208*	11.9%	7	4.1%	328*	21.5%
Met-Ed	418*	10.8%	507*	13.7%	37	11.9%	175*	14.8%
PECO+	933*	14.7%	1,142*	17.1%	24	3.9%	338*	15.9%
Penelec	547*	13.5%	521*	12.9%	29	8.7%	153*	11.7%
Penn Power	147*	13.5%	150*	12.4%	7	7.1%	50	13.5%
PPL	1,014*	11.2%	749*	10.1%	43	6.1%	335*	11.6%
UGI-Electric	57	12.2%	74	13.5%	8	7.1%	19	10.9%
West Penn	355*	8.9%	523*	12.2%	42	14.5%	163*	11.8%
Average* **	**3,669**		**3,874**		**197**		**1,561**	
Total		**11.8%**		**13.0%**		**7.5%**		**14.3%**

* Based on a probability sample of complaints.
** Estimated based on the number of complaints in CSIS: 2018 as of June 21, 2019; 2019 as of July 10, 2020; 2020 as of June 4, 2021; and 2021 as of Sept. 10, 2022.
*** Does not include UGI-Electric.
\+ PECO statistics include electric and gas.

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

2018-21 Average Response Time to BCS Residential Payment Arrangement Requests (PARs) Major Electric Distribution Companies

Utility	Number of Days			
	2018	2019	2020	2021
Duquesne	3.8	5.1	10.0	8.5
Met-Ed	8.2	11.7	8.4	7.3
PECO+	5.4	7.9	10.9	8.2
Penelec	8.6	11.6	7.3	7.9
Penn Power	9.1	12.8	6.8	9.0
PPL	5.4	6.4	7.0	5.6
UGI-Electric	12.6	8.8	6.2	2.8
West Penn	9.1	12.1	7.0	7.8
Average*	**5.5**	**7.0**	**6.0**	**7.2**

* Does not include UGI-Electric.
+ PECO statistics include electric and gas.

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

- The calculation for average response excludes undisputed PARs and CURE complaints.

- There was a wide range of PAR response times among the major EDCs in 2020, from a low of 6.8 days for Penn Power to a high of 10.9 days for PECO. In 2021, response times ranged from a low of 2.8 days for UGI-Electric to a high of 9.0 days for Penn Power.

Termination and Reconnection of Service

Each month, the electric utilities report to the Commission the number of residential accounts that they terminated for non-payment during the previous month. They also report the number of previously terminated residential accounts that they reconnected during the month. Some EDCs maintain a fairly consistent pattern of termination behavior, while others fluctuate from year to year. The number of reconnections varies from year to year and from utility to utility, depending on a variety of factors. The EDC reconnects a customer's terminated service when a customer either pays their debt in full or makes a significant payment on the debt and agrees to a payment arrangement for the balance owed to the utility or presents a medical certificate. The following tables indicate the annual number of residential accounts each of the seven largest EDCs terminated and reconnected in 2018, 2019, 2020, and 2021. The first table also presents the termination rates for each of these utilities.

Residential Service Terminations/Termination Rates
Major Electric Distribution Companies

Utility	Residential Service Terminations				Termination Rates			
	2018	2019	2020	2021	2018	2019	2020	2021
Duquesne	26,119	27,688	0	30,945	4.88	5.14	0.00	5.70
Met-Ed	24,099	26,076	754	26,941	4.80	5.17	0.15	5.26
PECO+	85,583	92,977	81	76,487	4.37	6.18	0.01	5.00
Penelec	19,949	21,065	760	20,354	3.98	4.21	0.15	4.06
Penn Power	4,089	4,293	150	2,416	2.81	2.94	0.10	1.63
PPL	44,971	53,340	1,502	30,843	3.66	4.32	0.12	2.47
UGI-Electric	1,025	913	36	1,493	1.86	1.66	0.07	2.71
West Penn	13,577	19,743	796	16,147	2.17	3.15	0.13	2.55
Total	**219,412**	**246,095**	**4,079**	**205,626**				
Average of Rates*					**3.81**	**4.44**	**0.09**	**3.81**

* Does not include UGI-Electric
+ 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.

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

Residential Service Reconnections
Major Electric Distribution Companies

Utility	2018	2019	2020	2021
Duquesne	19,522	21,468	0	24,848
Met-Ed	19,916	22,325	485	23,842
PECO+	71,705	78,866	1,181	66,909
Penelec	14,882	16,095	480	16,094
Penn Power	3,186	3,449	85	1,844
PPL	31,666	39,001	840	22,309
UGI-Electric	695	660	27	1,143
West Penn	10,104	15,308	536	12,882
Total	**171,676**	**197,172**	**3,634**	**169,871**

+ PECO statistics include electric and gas.

- Due to the Covid 19 pandemic, residential terminations were suspended from Mar. 13, 2020, to Mar. 31, 2021. Utilities were encouraged to reconnect residential customers for health and safety reasons. This significantly impacted 2020 numbers for both terminations and reconnections.

Compliance

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

The infraction rates in the table that follows are based on informal complaints that residential consumers filed with BCS from 2018 through 2021. Infractions identified on complaints involving competition issues are included in the infraction statistics. The Infraction Category tables present detailed information about the infractions identified in 2020 and 2021 complaints to the BCS.

Commission Infraction Rates
Major Electric Distribution Companies

Utility	2018	2019	2020	2021
Duquesne	0.21	0.16	0.10	0.23
Met-Ed	0.12	0.13	0.05	0.18
PECO+	0.03	0.03	0.02	0.08
Penelec	0.11	0.11	0.06	0.13
Penn Power	0.19	0.15	0.05	0.18
PPL	0.11	0.06	0.03	0.04
UGI-Electric	0.33	0.51	0.05	0.27
West Penn	0.13	0.09	0.07	0.09

+ PECO statistics include electric and gas.

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

- The tables below show the actual number of infractions for 2020 and 2021 by category.

- The categories with termination procedures, dispute-handling, and credit standards and deposits are consistently high percentage infraction areas.

Number of Major Electric Distribution Company Infractions*
2020

Category	Duquesne	Met-Ed	PECO+	Penelec	Penn Power	PPL	UGI-Electric	West Penn	Electric Total
Billing and Payment	8	1	5	2	0	4	0	3	**23**
Meter Reading	1	0	1	0	0	0	0	0	**2**
Make-Up Bills	0	0	0	0	0	1	1	0	**2**
Transfer of Accounts	0	1	0	0	0	3	1	2	**7**
Credit Standards and Deposits	17	11	3	10	3	2	0	16	**62**
Termination Grounds	2	0	0	0	0	0	0	1	**3**
Termination Procedures	0	2	2	4	0	1	1	4	**14**
Reconnection of Service	0	0	0	0	0	0	0	0	**0**
Liability - Responsibility for Bills	0	1	0	0	0	0	0	1	**2**
Landlord/Ratepayer	0	3	0	0	0	0	0	1	**4**
Dispute Handling	14	0	8	13	4	15	0	7	**61**
Other	11	5	7	3	0	8	0	6	**40**
Total	**53**	**24**	**26**	**32**	**7**	**34**	**3**	**41**	**220**

* The number of verified infractions identified by BCS as of Aug. 26, 2021.
\+ PECO statistics include electric and gas.

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

Number of Major Electric Distribution Company Infractions*
2021

Category	Duquesne	Met-Ed	PECO+	Penelec	Penn Power	PPL	UGI-Electric	West Penn	Electric Total
Billing and Payment	5	14	4	10	1	0	1	3	**38**
Meter Reading	2	0	6	0	0	1	0	1	**10**
Make-Up Bills	1	3	1	3	0	0	0	0	**8**
Transfer of Accounts	0	0	5	3	0	1	1	0	**10**
Credit Standards and Deposits	18	10	18	17	5	4	1	7	**80**
Termination Grounds	6	1	5	1	0	2	0	0	**15**
Termination Procedures	34	22	34	6	6	9	7	13	**131**
Reconnection of Service	4	3	2	0	0	2	0	2	**13**
Liability - Responsibility for Bills	1	0	7	0	0	1	0	0	**9**
Landlord/Ratepayer	0	1	0	0	0	0	0	0	**1**
Dispute Handling	14	9	30	8	4	24	2	11	**102**
Other	42	27	15	17	10	11	3	23	**148**
Total	**127**	**90**	**127**	**65**	**26**	**55**	**15**	**60**	**565**

* The number of verified infractions identified by BCS as of May 2, 2022.
\+ PECO statistics include electric and gas.

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

Percent of Major Electric Distribution Company Infractions*
2020

Category	Duquesne	Met-Ed	PECO+	Penelec	Penn Power	PPL	UGI-Electric	West Penn	Electric Average**
Billing and Payment	15%	4%	19%	6%	0%	12%	0%	7%	**9%**
Meter Reading	2%	0%	4%	0%	0%	0%	0%	0%	**1%**
Make-Up Bills	0%	0%	0%	0%	0%	3%	33%	0%	**0%**
Transfer of Accounts	0%	4%	0%	0%	0%	9%	33%	5%	**3%**
Credit Standards and Deposits	32%	46%	12%	31%	43%	6%	0%	39%	**30%**
Termination Grounds	4%	0%	0%	0%	0%	0%	0%	2%	**1%**
Termination Procedures	0%	8%	8%	13%	0%	3%	33%	10%	**6%**
Reconnection of Service	0%	0%	0%	0%	0%	0%	0%	0%	**0%**
Liability - Responsibility for Bills	0%	4%	0%	0%	0%	0%	0%	2%	**1%**
Landlord/Ratepayer	0%	13%	0%	0%	0%	0%	0%	2%	**2%**
Dispute Handling	26%	0%	31%	41%	57%	44%	0%	17%	**31%**
Other	21%	21%	27%	9%	0%	24%	0%	15%	**17%**

* The number of verified infractions identified by BCS as of Aug. 26, 2021.
** Electric Average does not include UGI-Electric.
\+ PECO statistics include electric and gas.

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

Percent of Major Electric Distribution Company Infractions*
2021

Category	Duquesne	Met-Ed	PECO+	Penelec	Penn Power	PPL	UGI-Electric	West Penn	Electric Average**
Billing and Payment	4%	16%	3%	15%	4%	0%	7%	5%	**7%**
Meter Reading	2%	0%	5%	0%	0%	2%	0%	2%	**1%**
Make-Up Bills	1%	3%	1%	5%	0%	0%	0%	0%	**1%**
Transfer of Accounts	0%	0%	4%	5%	0%	2%	7%	0%	**2%**
Credit Standards and Deposits	14%	11%	14%	26%	19%	7%	7%	12%	**14%**
Termination Grounds	5%	1%	4%	2%	0%	4%	0%	0%	**2%**
Termination Procedures	27%	24%	27%	9%	23%	16%	47%	22%	**24%**
Reconnection of Service	3%	3%	2%	0%	0%	4%	0%	3%	**2%**
Liability - Responsibility for Bills	1%	0%	6%	0%	0%	2%	0%	0%	**1%**
Landlord/Ratepayer	0%	1%	0%	0%	0%	0%	0%	0%	**0%**
Dispute Handling	11%	10%	24%	12%	15%	44%	13%	18%	**18%**
Other	33%	30%	12%	26%	38%	20%	20%	38%	**27%**

* The number of verified infractions identified by BCS as of May 2, 2022.
** Electric Average does not include UGI-Electric.
\+ PECO statistics include electric and gas.

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

8. Natural Gas Industry

In 2020, the Commission had jurisdiction over 22 natural gas distribution companies (NGDCs) and 21 NGDCs in 2021. The majority of Consumer Complaints and PARs are about the five major NGDCs: Columbia Gas of Pennsylvania Inc. (**Columbia**), National Fuel Gas Distribution Corp. (**NFG**), Peoples Natural Gas Co. (**Peoples**), Philadelphia Gas Works (**PGW**), and UGI Gas f/k/a UGI South (**UGI Gas**). This chapter will focus exclusively on those five utilities.

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

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

The statistics in the tables on the pages that follow depict the performance of each of the five major gas utilities in 2020 and 2021. The major gas utilities are those that have more than 100,000 residential customers.

Total Complaint Rate

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

2018-21 Residential Total Complaint Numbers/Rates
Major Natural Gas Distribution Companies

Utility	2018		2019		2020		2021	
	Number	Rate	Number	Rate	Number	Rate	Number	Rate
Columbia	1,016	2.56	852	2.13	257	0.63	639	1.57
NFG	924	4.69	895	4.55	150	0.76	355	1.79
Peoples*	1,318	3.94	1,584	4.72	477	0.81	1,344	2.27
Peoples-Equitable*	993	4.00	1,071	4.32	n/a	n/a	n/a	n/a
PGW	9,546	19.99	7,568	15.76	1,417	2.91	3,951	8.08
UGI Gas**	3,367	9.31	3,305	9.00	1,199	1.98	1,645	2.69
UGI North**	1,904	12.16	2,041	13.00	n/a	n/a	n/a	n/a
Total	**19,068**		**17,316**		**3,500**		**7,934**	
Average of Rates		**8.77**		**7.93**		**1.53**		**3.45**

* Due to the Peoples Natural Gas merger, effective Jan. 1, 2020, the Peoples data includes Peoples-Equitable.
** Due to the UGI Gas merger, effective Jan. 1, 2020, the UGI Gas data includes UGI Central and UGI North.

Consumer Complaints

During 2020, BCS handled 1,299 Consumer Complaints from residential customers of the various NGDCs (1,114) and natural gas suppliers (NGSs) (185). The five major NGDCs represented 84% (1,089) of the total Consumer Complaints.

During 2021, BCS handled 1,722 Consumer Complaints from residential customers of the various NGDCs (1,528) and natural gas suppliers (NGSs) (194). The five major NGDCs represented 87% (1,494) of the total Consumer Complaints.

Consumer Complaint Categories

The following tables show the number and percentage of 2020 and 2021 complaints in each of the 14 categories used by BCS policy analysts for compliance evaluation.

Number of Consumer Complaints by Dispute Category
2020 Complaints Evaluated*
Major Natural Gas Distribution Companies

Categories	Columbia	NFG	Peoples	PGW	UGI Gas	Gas Total
Billing Disputes	7	15	27	154	47	**250**
Personnel Problems	15	4	40	52	35	**146**
Discontinuance/Transfer	3	3	21	58	16	**101**
Service Quality	11	4	34	12	14	**75**
Termination or PAR Procedures	0	1	14	46	10	**71**
Other Payment Issues	0	1	13	33	14	**61**
Damages	7	0	19	10	16	**52**
Metering	1	3	3	23	10	**40**
Credit and Deposits	3	1	4	14	13	**35**
Service Extensions	7	5	6	3	8	**29**
Scheduling Delays	0	0	14	6	4	**24**
Rates	3	0	3	3	3	**12**
Service Interruptions	1	0	2	6	0	**9**
All Other Problems	0	0	6	37	8	**51**
Total-Number*	**58**	**37**	**206**	**457**	**198**	**956**

* Based on residential complaints opened in 2020 and evaluated by BCS as of June 4, 2021.

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

Number of Consumer Complaints by Dispute Category
2021 Complaints Evaluated*
Major Natural Gas Distribution Companies

Categories	Columbia	NFG	Peoples	PGW	UGI Gas	Gas Total
Billing Disputes	15	15	42	104	47	**223**
Personnel Problems	20	14	52	55	44	**185**
Discontinuance/Transfer	3	10	31	74	31	**149**
Termination or PAR Procedures	9	6	65	34	33	**147**
Metering	5	6	7	49	23	**90**
Other Payment Issues	7	4	22	36	11	**80**
Service Quality	4	6	16	19	15	**60**
Damages	6	0	24	10	10	**50**
Scheduling Delays	0	0	15	10	7	**32**
Rates	16	0	4	2	3	**25**
Credit and Deposits	1	0	4	12	5	**22**
Service Extensions	0	1	5	1	6	**13**
Service Interruptions	1	0	1	5	1	**8**
All Other Problems	2	2	21	40	15	**80**
Total-Number*	**89**	**64**	**309**	**451**	**251**	**1,164**

* Based on residential complaints opened in 2021 and evaluated by BCS as of Sept. 10, 2022.

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

Percent of Consumer Complaints by Dispute Category
2020 Complaints Evaluated
Major Natural Gas Distribution Companies

Categories	Columbia	NFG	Peoples	PGW	UGI Gas	Gas Average
Billing Disputes	12%	41%	13%	34%	24%	**26%**
Personnel Problems	26%	11%	19%	11%	18%	**15%**
Discontinuance/Transfer	5%	8%	10%	13%	8%	**11%**
Service Quality	19%	11%	17%	3%	7%	**8%**
Termination or PAR Procedures	0%	3%	7%	10%	5%	**7%**
Other Payment Issues	0%	3%	6%	7%	7%	**6%**
Damages	12%	0%	9%	2%	8%	**5%**
Metering	2%	8%	1%	5%	5%	**4%**
Credit and Deposits	5%	3%	2%	3%	7%	**4%**
Service Extensions	12%	14%	3%	1%	4%	**3%**
Scheduling Delays	0%	0%	7%	1%	2%	**3%**
Rates	5%	0%	1%	1%	2%	**1%**
Service Interruptions	2%	0%	1%	1%	0%	**1%**
All Other Problems	0%	0%	3%	8%	4%	**5%**
Total-Number*	**58**	**37**	**206**	**457**	**198**	**956**

*Based on residential complaints opened in 2020 and evaluated by BCS as of June 4, 2021.

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

- Of the 956 Consumer Complaints evaluated, the top three categories of NGDC complaints for 2020 account for over half (52%) of the total: 26% billing disputes, 15% personnel problems, and 11% discontinuance/transfer.

Percent of Consumer Complaints by Dispute Category
2021 Complaints Evaluated
Major Natural Gas Distribution Companies

Categories	Columbia	NFG	Peoples	PGW	UGI Gas	Gas Average
Billing Disputes	17%	23%	14%	23%	19%	**19%**
Personnel Problems	22%	22%	17%	12%	18%	**16%**
Discontinuance/Transfer	3%	16%	10%	16%	12%	**13%**
Termination or PAR Procedures	10%	9%	21%	8%	13%	**13%**
Metering	6%	9%	2%	11%	9%	**8%**
Other Payment Issues	8%	6%	7%	8%	4%	**7%**
Service Quality	4%	9%	5%	4%	6%	**5%**
Damages	7%	0%	8%	2%	4%	**4%**
Scheduling Delays	0%	0%	5%	2%	3%	**3%**
Rates	18%	0%	1%	<1%	1%	**2%**
Credit and Deposits	1%	0%	1%	3%	2%	**2%**
Service Extensions	0%	2%	2%	<1%	2%	**1%**
Service Interruptions	1%	0%	<1%	1%	<1%	**1%**
All Other Problems	2%	3%	7%	9%	6%	**7%**
Total-Number*	**89**	**64**	**309**	**451**	**251**	**1,164**

*Based on residential complaints opened in 2021 and evaluated by BCS as of Sept. 10, 2022.

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

- Of the 1,164 Consumer Complaints evaluated, the top three categories of NGDC complaints for 2021 account for nearly half (48%) of the total: 19% billing disputes, 16% personnel problems, and 13% discontinuance/transfer.

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

The following tables show the Consumer Complaint Rate, the Justified Consumer Complaint Rate, and the Percent of Justified Consumer Complaints. The Consumer Complaint rate is the number of Consumer Complaints for each 1,000 residential customers. The justified Consumer Complaint rate is the estimated number of justified Consumer Complaints for each 1,000 residential customers based on a statistically valid sampling of complaints. A complaint is considered "justified" if it is found that the utility did not comply with Commission Orders, policies, regulations, reports, Secretarial Letters, or tariffs. The percent of justified Consumer Complaints is the estimated number of justified complaints divided by the total number of complaints received (multiplied by 100). BCS evaluates a statistically valid sampling of complaints for each utility.

2020 and 2021 Residential Consumer Complaint Rates, Justified Consumer Complaint Rates, and Percent of Justified Consumer Complaints Major Natural Gas Distribution Companies

Utility	Consumer Complaint Rate	Justified Consumer Complaint Rate	Percent of Justified Consumer Complaints
2020			
Columbia	0.19	0.01	3.9%
NFG	0.26	0.03	11.8%
Peoples	0.40	0.01	2.1%
PGW	1.03	0.14	14.0%
UGI Gas	0.37	0.03	8.1%
Average	**0.45**	**0.04**	**9.4%**
2021			
Columbia	0.30	0.02	5.7%
NFG	0.37	0.03	6.8%
Peoples	0.63	0.02	3.2%
PGW	1.28	0.31	23.9%
UGI Gas	0.48	0.07	13.5%
Average	**0.61**	**0.09**	**14.3%**

- The justified Consumer Complaint rate is a normalized ratio useful for comparing utility performance among the various companies. It is not a percentage.
- The percent of justified Consumer Complaints represents a utility's individual performance.
- The following table presents the number of Consumer Complaints and Consumer Complaint rate for each major gas utility in 2018, 2019, 2020 and 2021.

2018-21 Residential Consumer Complaint Numbers/Rates
Major Natural Gas Distribution Companies

Utility	2018		2019		2020		2021	
	Number	Rate	Number	Rate	Number	Rate	Number	Rate
Columbia	159	0.40	137	0.34	76	0.19	122	0.30
NFG	112	0.57	96	0.49	51	0.26	74	0.37
Peoples*	233	0.70	227	0.68	239	0.40	374	0.63
Peoples-Equitable*	199	0.80	163	0.66	n/a	n/a	n/a	n/a
PGW	1,054	2.21	920	1.92	501	1.03	628	1.28
UGI Gas**	358	0.99	296	0.81	222	0.37	296	0.48
UGI North**	233	1.49	235	1.50	n/a	n/a	n/a	n/a
Total	**2,348**		**2,074**		**1,089**		**1,494**	
Average of Rates		**1.02**		**0.91**		**0.45**		**0.61**

* Due to the Peoples Natural Gas merger, effective Jan. 1, 2020, the Peoples data includes Peoples-Equitable.
** Due to the UGI Gas merger, effective Jan. 1, 2020, the 2020 UGI Gas data includes UGI Central and UGI North.

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

2018-21 Justified Residential Consumer Complaint Numbers/Rates
Major Natural Gas Distribution Companies

Utility	2018		2019		2020		2021	
	Number**	Rate	Number**	Rate	Number**	Rate	Number**	Rate
Columbia	3	0.01	4	0.01	3	0.01	7	0.02
NFG	9	0.05	10	0.05	6	0.03	5	0.03
Peoples***	7	0.02	3	0.01	5	0.01	12	0.02
Peoples-Equitable***	10	0.04	9	0.04	n/a	n/a	n/a	n/a
PGW	74*	0.15*	77*	0.16*	70	0.14	150*	0.31*
UGI Gas****	50	0.14	33	0.09	18	0.03	40	0.07
UGI North****	45	0.29	25	0.16	n/a	n/a	n/a	n/a
Total	**198**		**161**		**102**		**214**	
Average of Rates		**0.10**		**0.07**		**0.04**		**0.09**

* Based on a probability sample of complaints.
** Estimated based on the number of complaints in CSIS: 2018 as of June 21, 2019; 2019 as of July 10, 2020; 2020 as of June 4, 2021; and 2021 as of Sept. 10, 2022.
*** Due to the Peoples Natural Gas merger, effective Jan. 1, 2020, the 2020 Peoples data includes Peoples-Equitable.
**** Due to the UGI Gas merger, effective Jan. 1, 2020, the 2020 UGI Gas data includes UGI Central and UGI North.

- The justified Consumer Complaint rate is a normalized ratio useful for comparing utility performance among the various companies. It is not a percentage.

- In 2020, the justified Consumer Complaint rates for NFG, Peoples, PGW, and UGI Gas decreased, while the rate for Columbia remained stable from 2018 to 2020. The 2020 justified Consumer Complaint rate for PGW was greater than the 2020 industry average.

- In 2021, the justified Consumer Complaint rates for NFG and UGI Gas decreased, while the rates for Columbia, Peoples, and PGW increased. The 2021 justified Consumer Complaint Rate for PGW was greater than the 2021 industry average.

- The following table presents the percent of justified Consumer Complaints for each major gas utility in 2018, 2019, 2020 and 2021.

2018-21 Number/Percent of Justified Residential Consumer Complaints
Major Natural Gas Distribution Companies

Utility	2018		2019		2020		2021	
	Number**	Percent	Number**	Percent	Number**	Percent	Number**	Percent
Columbia	3	1.9%	4	2.9%	3	3.9%	7	5.7%
NFG	9	8.0%	10	10.4%	6	11.8%	5	6.8%
Peoples***	7	3.0%	3	1.3%	5	2.1%	12	3.2%
Peoples-Equitable***	10	5.0%	9	5.5%	n/a	n/a	n/a	n/a
PGW	74*	7.0%	77*	8.4%	70	14.0%	150*	23.9%
UGI Gas****	50	14.0%	33	11.1%	18	8.1%	40	13.5%
UGI North****	45	19.3%	25	10.6%	n/a	n/a	n/a	n/a
Total	**198**		**161**		**102**		**214**	
Average		**8.4%**		**7.8%**		**9.4%**		**14.3%**

* Based on a probability sample of complaints.
** Estimated based on the number of complaints in CSIS: 2018 as of June 21, 2019; 2019 as of July 10, 2020; 2020 as of June 4, 2021; and 2021 as of Sept. 10, 2022.
*** Due to the Peoples Natural Gas merger, effective Jan. 1, 2020, the Peoples data includes Peoples-Equitable.
**** Due to the UGI Gas merger, effective Jan. 1, 2020, the UGI Gas data includes UGI Central and UGI North.

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

2018-21 Average Response Time to BCS Residential Consumer Complaints Major Natural Gas Distribution Companies

Utility	Number of Days			
	2018	2019	2020	2021
Columbia	6.6	6.9	9.6	10.3
NFG	12.4	12.9	11.2	13.6
Peoples*	3.5	3.6	3.4	4.8
Peoples-Equitable*	3.4	3.8	n/a	n/a
PGW	17.6	14.8	10.5	21.2
UGI Gas**	16.3	11.3	8.8	7.6
UGI North**	16.0	11.9	n/a	n/a
Average	**13.9**	**11.2**	**8.4**	**13.0**

* Due to the Peoples Natural Gas merger, effective Jan. 1, 2020, the Peoples data includes Peoples-Equitable.
** Due to the UGI Gas merger, effective Jan. 1, 2020, the UGI Gas data includes UGI Central and UGI North.

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

- Average response time includes all residential NGDC Consumer Complaints except complaints processed through CURE.

- Consumer Complaint response time performance varied among the major gas utilities in 2020, from a low of 3.4 days for Peoples to a high of 11.2 days for NFG. In 2021, Consumer Complaint response time ranged from a low of 4.8 days for Peoples to a high of 21.2 days for PGW.

Payment Arrangement Requests

During 2020, BCS handled 1,421 PARs from residential gas customers of the various NGDCs (1,398) and NGSs (23). The five major NGDCs represented 98% (1,386) of the total PARs. During 2021, BCS handled 5,095 PARs from residential gas customers of the various NGDCs (5,087) and NGSs (8). The five major NGDCs represented 99% (5,035) of the total PARs.

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

The following tables show the PAR Rate, the Justified PAR Rate, and the Percent of Justified PARs. The PAR rate is the number of PARs for each 1,000 residential customers. The justified PAR rate is the estimated number of justified PARs for each 1,000 residential customers based on a statistically valid sampling of complaints. A complaint is considered "justified" if it is found that the utility did not comply with Commission Orders, policies, regulations, reports, Secretarial Letters, or tariffs. The percent of justified PARs is the number

of justified complaints divided by the number of complaints evaluated (multiplied by 100). BCS evaluates a statistically valid sampling of complaints for each utility. The percent of justified PARs is the estimated number of justified complaints divided by the total number of complaints received (multiplied by 100). BCS evaluates a statistically valid sampling of complaints for each utility.

2020 and 2021 Residential Payment Arrangement Request (PAR) Rates, Justified PAR Rates, and Percent of Justified PARs Major Natural Gas Distribution Companies

Utility	PAR Rate	Justified PAR Rate	Percent of Justified PARs
2020			
Columbia	0.15	0.00	0.0%
NFG	0.28	0.02	5.4%
Peoples	0.19	0.03	14.0%
PGW	1.08	0.08	7.8%
UGI Gas	1.04	0.11	10.4%
Average	**0.55**	**0.05**	**9.0%**
2021			
Columbia	0.83	0.03	3.8%
NFG	1.11	0.22	19.6%
Peoples	1.30	0.08	6.5%
PGW	5.47	0.55	10.1%
UGI Gas	1.69	0.11	6.6%
Average	**2.08**	**0.20**	**8.8%**

- The PAR rate equals the number of PARs for each 1,000 residential customers.
- The justified PAR rate equals the estimated number of justified PARs for each 1,000 residential customers. The justified rate is a normalized ratio useful for comparing utility performance among the various companies.
- The percent of justified PARs is the estimated number of justified complaints divided by the total number of complaints received. (BCS evaluates a statistically valid sampling of complaints for each utility.)
- The following table presents the number of PARs and the PAR rate for each major NGDC in 2018, 2019, 2020 and 2021.

2018-21 Residential Payment Arrangement Request (PAR) Numbers/Rates
Major Natural Gas Distribution Companies

Utility	2018		2019		2020		2021	
	Number	Rate	Number	Rate	Number	Rate	Number	Rate
Columbia	535	1.35	469	1.17	62	0.15	338	0.83
NFG	587	2.98	610	3.10	56	0.28	219	1.11
Peoples*	710	2.12	870	2.59	114	0.19	769	1.30
Peoples-Equitable*	616	2.48	685	2.76	n/a	n/a	n/a	n/a
PGW	6,112	12.80	4,739	9.87	526	1.08	2,676	5.47
UGI Gas**	2,305	6.37	2,330	6.35	628	1.04	1,033	1.69
UGI North**	1,418	9.06	1,505	9.58	n/a	n/a	n/a	n/a
Total	**12,283**		**11,208**		**1,386**		**5,035**	
Average of Rates		**5.31**		**5.06**		**0.55**		**2.08**

* Due to the Peoples Natural Gas merger, effective Jan. 1, 2020, the Peoples data includes Peoples-Equitable.
** Due to the UGI Gas merger, effective Jan. 1, 2020, the UGI Gas data includes UGI Central and UGI North.

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

2018-21 Justified Residential Payment Arrangement Request (PAR) Numbers/Rates
Major Natural Gas Distribution Companies

Utility	2018		2019		2020		2021	
	Number**	Rate	Number**	Rate	Number**	Rate	Number**	Rate
Columbia	9	0.02	12	0.03	0	0.00	13	0.03
NFG	45	0.23	48	0.24	3	0.02	43	0.22
Peoples***	50	0.15	63*	0.19*	16	0.03	50*	0.08*
Peoples-Equitable***	38	0.15	49	0.20	n/a	n/a	n/a	n/a
PGW	610*	1.28*	508*	1.06*	41	0.08	270*	0.55*
UGI Gas****	228*	0.63*	274*	0.75*	65	0.11	68*	0.11*
UGI North****	221*	1.41*	161*	1.03*	n/a	n/a	n/a	n/a
Total	**1,201**		**1,115**		**125**		**444**	
Average of Rates		**0.55**		**0.50**		**0.05**		**0.20**

* Based on a probability sample of complaints.
** Estimated based on the number of complaints in CSIS: 2018 as of June 21, 2019; 2019 as of July 10, 2020; 2020 as of June 4, 2021; and 2021 as of Sept. 10, 2022.
*** Due to the Peoples Natural Gas merger, effective Jan. 1, 2020, the Peoples data includes Peoples-Equitable.
****Due to the UGI Gas merger, effective Jan. 1, 2020, the UGI Gas data includes UGI Central and UGI North.

- The justified PAR rate equals the estimated number of justified PARs for each 1,000 residential customers. It is not a percentage.

- The following table presents the percent of justified PARs for each major NGDC in 2018, 2019, 2020 and 2021.

2018-21 Number/Percent of Justified Residential Payment Arrangement Requests (PARs)
Major Natural Gas Distribution Companies

Utility	2018		2019		2020		2021	
	Number**	Percent	Number**	Percent	Number**	Percent	Number**	Percent
Columbia	9	1.7%	12	2.6%	0	0.0%	13	3.8%
NFG	45	7.7%	48	7.9%	3	5.4%	43	19.6%
Peoples***	50	7.0%	63*	7.2%	16	14.0%	50*	6.5%
Peoples-Equitable***	38	6.2%	49	7.2%	n/a	n/a	n/a	n/a
PGW	610*	10.0%	508*	10.7%	41	7.8%	270*	10.1%
UGI Gas****	228*	9.9%	274*	11.8%	65	10.4%	68*	6.6%
UGI North****	221*	15.6%	161*	10.7%	n/a	n/a	n/a	n/a
Total	**1,201**		**1,115**		**125**		**444**	
Average		**9.8%**		**9.9%**		**9.0%**		**8.8%**

* Based on a probability sample of complaints.
** Estimated based on the number of complaints in CSIS: 2018 as of June 21, 2019; 2019 as of July 10, 2020; 2020 as of June 4, 2021; and 2021 as of Sept. 10, 2022.
*** Due to the Peoples Natural Gas merger, effective Jan. 1, 2020, the Peoples data includes Peoples-Equitable.
****Due to the UGI Gas merger, effective Jan. 1, 2020, the UGI Gas data includes UGI Central and UGI North.

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

2018-21 Average Response Time to BCS Residential Payment Arrangement Requests (PARs) Major Natural Gas Distribution Companies

Utility	Number of Days			
	2018	2019	2020	2021
Columbia	2.6	2.4	4.2	6.3
NFG	8.4	6.3	6.0	6.7
Peoples*	2.2	2.3	2.2	2.4
Peoples-Equitable*	2.2	2.1	n/a	n/a
PGW	11.6	7.6	4.6	15.5
UGI Gas**	9.5	6.2	5.6	2.5
UGI North**	8.8	6.3	n/a	n/a
Average	**7.6**	**4.3**	**3.2**	**10.4**

*Due to the Peoples Natural Gas merger, effective Jan. 1, 2020, the Peoples data includes Peoples-Equitable.
**Due to the UGI Gas merger, effective Jan. 1, 2020, the UGI Gas data includes UGI Central and UGI North.

- Response time is the number of days from the date BCS first contacts the utility regarding a complaint to the date on which the utility provides BCS with its initial informal complaint report. Response time quantifies the speed of a utility's response to BCS PAR complaints.
- The calculation for average response excludes undisputed PARs and CURE complaints.
- The 2020 PAR response times for the major NGDCs varied from a low of 2.2 days for Peoples to a high of 6.0 days for NFG. In 2021, PAR response time ranged from a low of 2.4 days for Peoples to a high of 15.5 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 utility to utility, 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 arrangement for the balance owed to the utility or presents a medical certificate. The tables that follow indicate the annual number of residential accounts each of the seven largest gas utilities terminated and reconnected in 2018, 2019, 2020 and 2021. The first table also presents the termination rates for each of these utilities.

Residential Service Terminations/Termination Rates
Major Natural Gas Distribution Companies

Utility	Residential Service Terminations				Termination Rates			
	2018	2019	2020	2021	2018	2019	2020	2021
Columbia	10,859	10,770	12	9,760	2.74	2.69	0.00	2.39
NFG	6,249	7,533	0	7,091	3.17	3.83	0.00	3.58
Peoples*	9,707	11,255	823	23,754	2.90	3.35	0.14	4.01
Peoples-Equitable*	8,622	9,444	n/a	n/a	3.47	3.81	n/a	n/a
PGW	25,576	29,048	0	15,669	5.36	6.05	0.00	3.21
UGI Gas**	15,924	10,657	356	23,013	4.40	2.90	0.06	3.76
UGI North**	8,243	6,652	n/a	n/a	5.27	4.24	n/a	n/a
Total	**85,380**	**85,359**	**1,191**	**79,287**				
Average of Rates					**3.90**	**3.84**	**0.04**	**3.39**

*Due to the Peoples Natural Gas merger, effective Jan. 1, 2020, the Peoples data includes Peoples-Equitable.
**Due to the UGI Gas merger, effective Jan. 1, 2020, the UGI Gas data includes UGI Central and UGI North.

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

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

Residential Service Reconnections
Major Natural Gas Distribution Companies

Utility	2018	2019	2020	2021
Columbia	6,054	6,153	235	5,503
NFG	4,224	4,926	167	5,095
Peoples*	6,658	7,648	988	18,349
Peoples-Equitable*	6,055	6,598	n/a	n/a
PGW	17,657	20,986	1,256	10,567
UGI Gas**	10,806	7,825	579	17,239
UGI North**	5,539	4,839	n/a	n/a
Total	**56,993**	**58,975**	**3,225**	**56,753**

*Due to the Peoples Natural Gas merger, effective Jan. 1, 2020, the Peoples data includes Peoples-Equitable.
**Due to the UGI Gas merger, effective Jan. 1, 2020, the UGI Gas data includes UGI Central and UGI North.

- Due to the Covid 19 pandemic, residential terminations were suspended from Mar. 13, 2020, to Mar. 31, 2021. Utilities were encouraged to reconnect residential customers for health and safety reasons. This significantly impacted 2020 numbers for both terminations and reconnections.

Compliance

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

The infraction rates in the table that follows are based on the review of informal complaints that residential consumers filed with BCS from 2018 through 2021. Infractions identified on complaints involving competition issues are included in the infraction statistics. The Infraction Category tables present detailed information about the infractions identified in complaints to the BCS.

Commission Infraction Rates
Major Natural Gas Distribution Companies

Utility	2018	2019	2020	2021
Columbia	0.01	0.00	0.00	0.03
NFG	0.05	0.07	0.06	0.16
Peoples*	0.03	0.01	0.01	0.06
Peoples-Equitable*	0.02	0.03	n/a	n/a
PGW	0.17	0.18	0.28	0.47
UGI Gas**	0.16	0.14	0.04	0.13
UGI North**	0.34	0.25	n/a	n/a

*Due to the Peoples Natural Gas merger, effective Jan. 1, 2020, the Peoples data includes Peoples-Equitable.
**Due to the UGI Gas merger, effective Jan. 1, 2020, the UGI Gas data includes UGI Central and UGI North.

- The infraction rate is the number of informally verified infractions per 1,000 residential customers. Dividing per 1,000 customers normalizes the data for comparison purposes. The infraction rate is not a percentage.
- The tables below present the actual number of infractions for 2020 and 2021 by category.
- The dispute handling category is consistently a high percentage infraction area.

Number of Major Natural Gas Distribution Company Infractions*
2020

Category	Columbia	NFG	Peoples	PGW	UGI Gas	Gas Total
Billing and Payment	1	0	0	12	1	**14**
Meter Reading	0	2	0	1	1	**4**
Make-Up Bills	1	0	0	4	1	**6**
Transfer of Accounts	0	0	0	3	1	**4**
Credit Standards and Deposits	0	0	0	35	6	**41**
Termination Grounds	0	1	1	0	0	**2**
Termination Procedures	0	3	0	3	4	**10**
Reconnection of Service	0	0	0	1	0	**1**
Liability - Responsibility for Bills	0	0	0	1	0	**1**
Landlord/Ratepayer	0	1	0	2	0	**3**
Dispute Handling	0	2	2	41	5	**50**
Other	0	2	0	31	6	**39**
Total	**2**	**11**	**3**	**134**	**25**	**175**

* The number of verified infractions identified by BCS as of Aug. 26, 2021.

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

Number of Major Natural Gas Distribution Company Infractions*
2021

Category	Columbia	NFG	Peoples	PGW	UGI Gas	Gas Total
Billing and Payment	0	0	3	10	10	**23**
Meter Reading	2	2	2	11	8	**25**
Make-Up Bills	0	0	0	7	2	**9**
Transfer of Accounts	0	1	1	11	4	**17**
Credit Standards and Deposits	0	0	1	37	1	**39**
Termination Grounds	1	1	0	12	3	**17**
Termination Procedures	1	7	6	16	12	**42**
Reconnection of Service	0	7	1	5	3	**16**
Liability - Responsibility for Bills	0	0	0	1	0	**1**
Landlord/Ratepayer	1	0	0	4	4	**9**
Dispute Handling	4	2	4	63	15	**88**
Other	4	11	19	55	20	**109**
Total	**13**	**31**	**37**	**232**	**82**	**395**

* The number of verified infractions identified by BCS as of May 2, 2022.

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

Percent of Major Natural Gas Distribution Company Infractions*
2020

Category	Columbia	NFG	Peoples	PGW	UGI Gas	Gas Average
Billing and Payment	50%	0%	0%	9%	4%	**13%**
Meter Reading	0%	18%	0%	1%	4%	**5%**
Make-Up Bills	50%	0%	0%	3%	4%	**11%**
Transfer of Accounts	0%	0%	0%	2%	4%	**1%**
Credit Standards and Deposits	0%	0%	0%	26%	24%	**10%**
Termination Grounds	0%	9%	33%	0%	0%	**8%**
Termination Procedures	0%	27%	0%	2%	16%	**9%**
Reconnection of Service	0%	0%	0%	1%	0%	**0%**
Liability - Responsibility for Bills	0%	0%	0%	1%	0%	**0%**
Landlord/Ratepayer	0%	9%	0%	1%	0%	**2%**
Dispute Handling	0%	18%	67%	31%	20%	**27%**
Other	0%	18%	0%	23%	24%	**13%**

* The number of verified infractions identified by BCS as of Aug. 26, 2021.

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

Percent of Major Natural Gas Distribution Company Infractions*
2021

Category	Columbia	NFG	Peoples	PGW	UGI Gas	Gas Average
Billing and Payment	0%	0%	8%	4%	12%	**5%**
Meter Reading	15%	6%	5%	5%	10%	**8%**
Make-Up Bills	0%	0%	0%	3%	2%	**1%**
Transfer of Accounts	0%	3%	3%	5%	5%	**3%**
Credit Standards and Deposits	0%	0%	3%	16%	1%	**4%**
Termination Grounds	8%	3%	0%	5%	4%	**4%**
Termination Procedures	8%	23%	16%	7%	15%	**14%**
Reconnection of Service	0%	23%	3%	2%	4%	**6%**
Liability - Responsibility for Bills	0%	0%	0%	0%	0%	**0%**
Landlord/Ratepayer	8%	0%	0%	2%	5%	**3%**
Dispute Handling	31%	6%	11%	27%	18%	**19%**
Other	31%	35%	51%	24%	24%	**33%**

* The number of verified infractions identified by BCS as of May 2, 2022.

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

9. Water Industry

In 2020, 75 water utilities were regulated by the PUC and 76 water utilities were regulated in 2021. Tables in this chapter present Consumer Complaint and PAR information. The water utilities are categorized into three groupings based on the amount of the utility's annual revenue, including Class A water utilities, Class B water utilities, and Class C water utilities. Some municipal water utilities are subject to PUC regulation because they operate beyond their municipal boundary; however, the data for municipal water utilities is not included in this report.

Class A water utilities generate annual revenues of $1 million or more for three consecutive years. In 2020 and 2021, nine Class A water utilities served residential customers including:

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

The number of residential customers served by these utilities in 2020 ranged from 2,439 residential customers for Veolia Water Bethel to 628,402 residential customers for PAWC. The number of residential customers served by these utilities in 2021 ranged from 2,450 residential customers for Veolia Water Bethel to 632,758 residential customers for PAWC.

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

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

In 2020, six Class B utilities were operating in Pennsylvania; in 2021, there were seven Class B utilities. These utilities had annual revenues between $200,000 and $999,999 and served 298 to 1,351 residential customers in 2020 and 298 to 1,353 in 2021.

In 2020 and 2021, there were 38 Class C utilities. The annual revenue for these utilities was less than $200,000 and they served customers ranging from one to 1,198 in 2020 and two to 550 in 2021. The upper limit of residential customers served by Class C utilities changed from 2020 to 2021, because Hidden Valley Utility Services was reclassified as a Class B water utility due to having three consecutive years of revenues greater than $200,000.

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

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

Most residential Consumer Complaints and PARs to BCS concern the Class A water utilities. The tables on the pages that follow are specific to the Class A water utilities in 2020 and 2021.

Total Complaint Rate

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

2018-21 Residential Total Complaint Numbers/Rates
Major Class A Water Utilities

Utility	2018		2019		2020		2021	
	Number	Rate	Number	Rate	Number	Rate	Number	Rate
Aqua	2,107	5.25	985	2.44	399	0.98	823	2.01
PAWC	4,908	8.06	4,116	6.71	1,435	2.28	2,459	3.89
Large Class A Total	**7,015**		**5,101**		**1,834**		**3,282**	
Large Class A Average of Rates		**6.94**		**5.01**		**1.77**		**3.15**
Audubon	2	0.73	3	1.11	11	4.18	7	2.61
Columbia	31	3.21	35	3.60	10	1.02	7	0.71
Community Utilities	14	5.34	10	3.80	35	13.26	21	7.93
Newtown Artesian	1	0.11	1	0.10	0	0.00	3	0.31
Veolia Bethel	0	0.00	0	0.00	1	0.41	0	0.00
Veolia PA	142	2.58	103	1.83	59	1.03	88	1.51
York	129	2.09	119	1.92	45	0.72	44	0.69
"Other Class A" Total	**319**		**271**		**161**		**170**	
"Other Class A" Average of Rates*		**2.23**		**1.86**		**1.10**		**1.14**
All Class A Total	**7,334**		**5,372**		**1,995**		**3,452**	
All Class A Average of Rates**		**6.36**		**4.62**		**1.69**		**2.90**

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

Consumer Complaints

During 2020, BCS handled a total of 979 Consumer Complaints from residential customers of the various water utilities. The major Class A water utilities represented 79% (772) of the total Consumer Complaints.

During 2021, BCS handled a total of 1,272 Consumer Complaints from residential customers of the various water utilities. The major Class A water utilities represented 84% (1,070) of the total Consumer Complaints.

While a majority of Consumer Complaints involved the Class A water utilities in 2020 and 2021, the Commission devoted a significant amount of attention to the smaller water utilities to help educate them about customer service and billing compliance concerns.

During 2020, BCS handled 27 complaints for small water utilities, with 33% (9 complaints) involving billing disputes. During 2021, BCS handled 22 complaints for small water utilities, with 32% (7 complaints) involving billing disputes and 32% (7 complaints) involving service complaints.

Consumer Complaint Categories

The following tables show the number and percentage of 2020 and 2021 complaints in each of the 14 categories used by BCS policy analysts for compliance evaluation.

Number of Consumer Complaints by Dispute Category
2020 Complaints Evaluated*
Major Class A Water Utilities

Categories	Aqua	PAWC	Large Class A Avg	Audubon	Columbia	Community Utilities	Newtown Artesian	Veolia Bethel	Veolia PA	York	"Other Class A" Avg**	All Class A Water Average ***
Billing Disputes	54	212	**266**	1	0	1	0	0	5	1	**8**	**274**
Service Quality	20	52	**72**	0	1	21	0	0	7	4	**33**	**105**
Metering	21	42	**63**	0	0	0	0	1	4	0	**5**	**68**
Damages	1	38	**39**	0	0	0	0	0	2	0	**2**	**41**
Termination or PAR Procedures	5	21	**26**	0	0	0	0	0	0	0	**0**	**26**
Personnel Problems	5	16	**21**	0	0	1	0	0	0	0	**1**	**22**
Service Interruptions	2	10	**12**	0	0	0	0	0	0	0	**0**	**12**
Discontinuance / Transfer	1	9	**10**	0	0	0	0	0	0	1	**1**	**11**
Service Extensions	3	8	**11**	0	0	0	0	0	0	0	**0**	**11**
Rates	8	0	**8**	0	0	0	0	0	0	0	**0**	**8**
Other Payment Issues	3	1	**4**	0	0	0	0	0	0	0	**0**	**4**
Scheduling Delays	1	1	**2**	0	0	0	0	0	0	0	**0**	**2**
Credit and Deposits	0	1	**1**	0	0	0	0	0	0	0	**0**	**1**
All Other Problems	0	8	**8**	0	0	0	0	0	0	0	**0**	**8**
Total-Number*	**124**	**419**	**543**	**1**	**1**	**23**	**0**	**1**	**18**	**6**	**50**	**593**

* Based on residential complaints opened in 2020 and evaluated by BCS as of June 4, 2021.
** Calculated based on the rate of "Other Class A" utilities as a whole.
*** Calculated based on the rates of Aqua, PAWC, and "Other Class A" utilities as a whole.

- The table above reflects the number of evaluated residential complaints filed with BCS. See Appendix D-1 for an explanation of complaint categories.

Number of Consumer Complaints by Dispute Category
2021 Complaints Evaluated*
Major Class A Water Utilities

Categories	Aqua	PAWC	Large Class A Avg	Audubon	Columbia	Community Utilities	Newtown Artesian	Veolia Bethel	Veolia PA	York	"Other Class A" Avg**	All Class A Water Average ***
Billing Disputes	103	200	**303**	0	1	0	2	0	14	4	**21**	**324**
Metering	36	55	**91**	0	0	0	0	0	9	0	**9**	**100**
Termination or PAR Procedures	30	37	**67**	0	0	0	0	0	0	0	**0**	**67**
Service Quality	20	30	**50**	2	0	0	0	0	5	1	**8**	**58**
Damages	10	25	**35**	0	0	0	0	0	3	1	**4**	**39**
Discontinuance / Transfer	7	22	**29**	0	0	0	0	0	0	2	**2**	**31**
Personnel Problems	3	22	**25**	1	0	0	0	0	1	1	**3**	**28**
Scheduling Delays	6	16	**22**	1	0	0	0	0	1	0	**2**	**24**
Credit and Deposits	4	16	**20**	0	0	0	0	0	0	0	**0**	**20**
Rates	4	11	**15**	0	0	0	0	0	0	0	**0**	**15**
Other Payment Issues	7	4	**11**	0	0	0	0	0	2	0	**2**	**13**
Service Interruptions	2	8	**10**	0	0	0	0	0	1	0	**1**	**11**
Service Extensions	3	4	**7**	0	0	0	0	0	1	0	**1**	**8**
All Other Problems	6	25	**31**	0	0	0	0	0	0	2	**2**	**33**
Total-Number*	**241**	**475**	**716**	**4**	**1**	**0**	**2**	**0**	**37**	**11**	**55**	**771**

* Based on residential complaints opened in 2021 and evaluated by BCS as of Sept. 10, 2022.
** Calculated based on the rate of "Other Class A" utilities as a whole.
*** Calculated based on the rates of Aqua, PAWC, and "Other Class A" utilities as a whole.

- The table above reflects the number of evaluated residential complaints filed with BCS. See Appendix D-1 for an explanation of complaint categories.

Percent of Consumer Complaint by Dispute Categories
2020 Complaints Evaluated*
Major Class A Water Utilities

Categories	Aqua	PAWC	Large Class A Avg	Audubon	Columbia	Community Utilities	Newtown Artesian	Veolia Bethel	Veolia PA	York	"Other Class A" Avg**	All Class A Water Average ***
Billing Disputes	44%	51%	**49%**	100%	0%	4%	0%	0%	28%	17%	**16%**	**46%**
Service Quality	16%	12%	**13%**	0%	100%	91%	0%	0%	39%	67%	**66%**	**18%**
Metering	17%	10%	**12%**	0%	0%	0%	0%	100%	22%	0%	**10%**	**11%**
Damages	1%	9%	**7%**	0%	0%	0%	0%	0%	11%	0%	**4%**	**7%**
Termination or PAR Procedures	4%	5%	**5%**	0%	0%	0%	0%	0%	0%	0%	**0%**	**4%**
Personnel Problems	4%	4%	**4%**	0%	0%	4%	0%	0%	0%	0%	**2%**	**4%**
Service Interruptions	2%	2%	**2%**	0%	0%	0%	0%	0%	0%	0%	**0%**	**2%**
Discontinuance / Transfer	1%	2%	**2%**	0%	0%	0%	0%	0%	0%	17%	**2%**	**2%**
Service Extensions	2%	2%	**2%**	0%	0%	0%	0%	0%	0%	0%	**0%**	**2%**
Rates	6%	0%	**1%**	0%	0%	0%	0%	0%	0%	0%	**0%**	**1%**
Other Payment Issues	2%	<1%	**1%**	0%	0%	0%	0%	0%	0%	0%	**0%**	**1%**
Scheduling Delays	1%	<1%	**<1%**	0%	0%	0%	0%	0%	0%	0%	**0%**	**<1%**
Credit and Deposits	0%	<1%	**<1%**	0%	0%	0%	0%	0%	0%	0%	**0%**	**<1%**
All Other Problems	0%	2%	**1%**	0%	0%	0%	0%	0%	0%	0%	**0%**	**1%**
Total-Number*	**124**	**419**	**543**	**1**	**1**	**23**	**0**	**1**	**18**	**6**	**50**	**593**

* Based on residential complaints opened in 2020 and evaluated by BCS as of June 4, 2021.
** Calculated based on the rate of "Other Class A" utilities as a whole.
*** Calculated based on the rates of Aqua, PAWC, and "Other Class A" utilities as a whole.

- The table above reflects the number of evaluated residential complaints filed with BCS. See Appendix D-1 for an explanation of complaint categories

- Of the 593 Consumer Complaints evaluated in 2020 for the Class A water utilities, approximately 46% concerned billing disputes.

Percent of Consumer Complaint by Dispute Categories
2021 Complaints Evaluated*
Major Class A Water Utilities

Categories	Aqua	PAWC	Large Class A Avg	Audubon	Columbia	Community Utilities	Newtown Artesian	Veolia Bethel	Veolia PA	York	"Other Class A" Avg**	All Class A Water Average ***
Billing Disputes	43%	42%	**42%**	0%	100%	0%	100%	0%	38%	36%	**38%**	**42%**
Metering	15%	12%	**13%**	0%	0%	0%	0%	0%	24%	0%	**16%**	**13%**
Termination or PAR Procedures	12%	8%	**9%**	0%	0%	0%	0%	0%	0%	0%	**0%**	**9%**
Service Quality	8%	6%	**7%**	50%	0%	0%	0%	0%	14%	9%	**15%**	**8%**
Damages	4%	5%	**5%**	0%	0%	0%	0%	0%	8%	9%	**7%**	**5%**
Discontinuance / Transfer	3%	5%	**4%**	0%	0%	0%	0%	0%	0%	18%	**4%**	**4%**
Personnel Problems	1%	5%	**3%**	25%	0%	0%	0%	0%	3%	9%	**5%**	**4%**
Scheduling Delays	3%	3%	**3%**	25%	0%	0%	0%	0%	3%	0%	**4%**	**3%**
Credit and Deposits	2%	3%	**3%**	0%	0%	0%	0%	0%	0%	0%	**0%**	**3%**
Rates	2%	2%	**2%**	0%	0%	0%	0%	0%	0%	0%	**0%**	**2%**
Other Payment Issues	3%	1%	**2%**	0%	0%	0%	0%	0%	5%	0%	**4%**	**2%**
Service Interruptions	1%	2%	**1%**	0%	0%	0%	0%	0%	3%	0%	**2%**	**1%**
Service Extensions	1%	1%	**1%**	0%	0%	0%	0%	0%	3%	0%	**2%**	**1%**
All Other Problems	2%	5%	**4%**	0%	0%	0%	0%	0%	0%	18%	**4%**	**4%**
Total-Number*	**241**	**475**	**716**	**4**	**1**	**0**	**2**	**0**	**37**	**11**	**55**	**771**

* Based on residential complaints opened in 2020 and evaluated by BCS as of Sept. 10, 2022.
** Calculated based on the rate of "Other Class A" utilities as a whole.
*** Calculated based on the rates of Aqua, PAWC, and "Other Class A" utilities as a whole.

- The table above reflects the number of evaluated residential complaints filed with BCS. See Appendix D-1 for an explanation of complaint categories.

- Of the 771 Consumer Complaints evaluated in 2021 for the Class A water utilities, approximately 42% concerned billing disputes.

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

The following tables show the Consumer Complaint Rate, the Justified Consumer Complaint Rate, and the Percent of Justified Consumer Complaints. The Consumer Complaint rate is the number of Consumer Complaints for each 1,000 residential customers. The justified Consumer Complaint rate is the estimated number of justified Consumer Complaints for each 1,000 residential customers based on a statistically valid sampling of complaints. A complaint is considered "justified" if it is found that the utility did not comply with Commission Orders, policies, regulations, reports, Secretarial Letters, or tariffs. The percent of justified Consumer Complaints is the estimated number of justified complaints divided by the total number of complaints received (multiplied by 100). BCS evaluates a statistically valid sampling of complaints for each utility.

2020 and 2021 Residential Consumer Complaint Rates, Justified Consumer Complaint Rates, and Percent of Justified Consumer Complaints Major Class A Water Utilities

Utility	Consumer Complaint Rate	Justified Consumer Complaint Rate	Percent of Justified Consumer Complaints
2020			
Aqua	0.40	0.07	18.3%
PAWC	0.87	0.04	5.1%
Large Class A Average	**0.64**	**0.06**	**8.1%**
Audubon	0.38	0.00	0.0%
Columbia	0.10	0.00	0.0%
Community Utilities	8.71	0.38	4.3%
Newtown Artesian	0.00	0.00	0.0%
Veolia Bethel	0.41	0.41	100.0%
Veolia PA	0.42	0.02	4.2%
York	0.14	0.00	0.0%
"Other Class A" Average*	**0.40**	**0.03**	**5.1%**
All Class A Average**	**0.56**	**0.05**	**7.9%**
2021			
Aqua	0.71	0.10	13.8%
PAWC	1.14	0.12	10.1%
Large Class A Average	**0.93**	**0.11**	**11.2%**
Audubon	1.86	0.00	0.0%
Columbia	0.10	0.00	0.0%
Community Utilities	0.00	0.00	0.0%
Newtown Artesian	0.21	0.00	0.0%
Veolia Bethel	0.00	0.00	0.0%
Veolia PA	0.65	0.12	18.4%
York	0.17	0.00	0.0%
"Other Class A" Average*	**0.38**	**0.05**	**12.3%**
All Class A Average**	**0.74**	**0.09**	**11.2%**

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

- The justified Consumer Complaint rate is a normalized ratio useful for comparing utility performance among the various companies. It is not a percentage.
- The percent of justified Consumer Complaints represents a utility's individual performance.
- The following table presents the number of Consumer Complaints and Consumer Complaint rate for each major Class A water utility in 2018, 2019, 2020 and 2021.

2018-21 Residential Consumer Complaint Numbers/Rates
Major Class A Water Utilities

Utility	2018		2019		2020		2021	
	Number	Rate	Number	Rate	Number	Rate	Number	Rate
Aqua	294	0.73	249	0.62	164	0.40	290	0.71
PAWC	755	1.24	575	0.94	549	0.87	723	1.14
Large Class A Total	**1,049**		**824**		**713**		**1,013**	
Large Class A Average of Rates		**0.99**		**0.78**		**0.64**		**0.93**
Audubon	1	0.37	2	0.74	1	0.38	5	1.86
Columbia	2	0.21	1	0.10	1	0.10	1	0.10
Community Utilities	5	1.91	2	0.76	23	8.71	0	0.00
Newtown Artesian	1	0.11	0	0.00	0	0.00	2	0.21
Veolia Bethel	0	0.00	0	0.00	1	0.41	0	0.00
Veolia PA	40	0.73	34	0.60	24	0.42	38	0.65
York	24	0.39	20	0.32	9	0.14	11	0.17
"Other Class A" Total	**73**		**59**		**59**		**57**	
"Other Class A" Avg. of Rates*		**0.51**		**0.41**		**0.03**		**0.38**
All Class A Total	**1,122**		**883**		**772**		**1,070**	
All Class A Average of Rates**		**0.83**		**0.65**		**0.56**		**0.74**

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

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

2018-21 Justified Residential Consumer Complaint Numbers/Rates
Major Class A Water Utilities

Utility	2018		2019		2020		2021	
	Number**	Rate	Number**	Rate	Number**	Rate	Number**	Rate
Aqua	64	0.16	36	0.09	30	0.07	40	0.10
PAWC	129*	0.21*	94	0.15	28	0.04	73*	0.12*
Large Class A Total	**193**		**130**		**58**		**113**	
Large Class A Average of Rates		**0.19**		**0.12**		**0.06**		**0.11**
Audubon	0	0.00	0	0.00	0	0.00	0	0.00
Columbia	0	0.00	0	0.00	0	0.00	0	0.00
Community Utilities	0	0.00	0	0.00	1	0.38	0	0.00
Newtown Artesian	1	0.11	0	0.00	0	0.00	0	0.00
Veolia Bethel	0	0.00	0	0.00	1	0.41	0	0.00
Veolia PA	8	0.15	3	0.05	1	0.02	7	0.12
York	1	0.02	1	0.02	0	0.00	0	0.00
"Other Class A" Total	**10**		**4**		**3**		**7**	
"Other Class A" Avg. of Rates* **		**0.07**		**0.03**		**0.03**		**0.05**
All Class A Total	**203**		**134**		**61**		**120**	
All Class A Average of Rates** **		**0.15**		**0.09**		**0.05**		**0.09**

* Based on a probability sample of complaints.
** Estimated based on the number of complaints in CSIS: 2018 as of June 21, 2019; 2019 as of July 10, 2020; 2020 as of June 4, 2021; and 2021 as of Sept. 10, 2022.
*** Calculated based on the rate of "Other Class A" utilities as a whole.
**** Calculated based on the rates of Aqua, PAWC, and "Other Class A" utilities as a whole.

- The justified Consumer Complaint rate is a normalized ratio useful for comparing utility performance among the various companies. It is not a percentage.

- The Large Class A average justified Consumer Complaint rate decreased from 0.19 in 2018 to 0.06 in 2020, followed by an increase to 0.11 in 2021.

- The following table presents the percent of justified Consumer Complaints for each Class A water utility in 2018, 2019, 2020 and 2021.

2018-21 Number/Percent of Justified Residential Consumer Complaints
Major Class A Water Utilities

Utility	2018		2019		2020		2021	
	Number**	Percent	Number**	Percent	Number**	Percent	Number**	Percent
Aqua	64	21.8%	36	14.5%	30	18.3%	40	13.8%
PAWC	129*	17.1%	94	16.3%	28	5.1%	73*	10.1%
Large Class A Total	**193**		**130**		**58**		**113**	
Large Class A Average		**18.4%**		**15.8%**		**8.1%**		**11.2%**
Audubon	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Columbia	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Community Utilities	0	0.0%	0	0.0%	1	4.3%	0	0.0%
Newtown Artesian	1	100.0%	0	0.0%	0	0.0%	0	0.0%
Veolia Bethel	0	0.0%	0	0.0%	1	100.0%	0	0.0%
Veolia PA	8	20.0%	3	8.8%	1	4.2%	7	18.4%
York	1	4.2%	1	5.0%	0	0.0%	0	0.0%
"Other Class A" Total	**10**		**4**		**3**		**7**	
"Other Class A" Avg.* **		**13.7%**		**6.8%**		**5.1%**		**12.3%**
All Class A Total	**203**		**134**		**61**		**120**	
All Class A Average** **		**18.1%**		**15.2%**		**7.9%**		**11.2%**

* Based on a probability sample of complaints.
** Estimated based on the number of complaints in CSIS: 2018 as of June 21, 2019; 2019 as of July 10, 2020; 2020 as of June 4, 2021; and 2021 as of Sept. 10, 2022.
*** Calculated based on the rate of "Other Class A" utilities as a whole.
**** Calculated based on the rates of Aqua, PAWC, and "Other Class A" utilities as a whole.

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

2018-21 Average Response Time to BCS Residential Consumer Complaints Major Class A Water Utilities

Utility	Number of Days			
	2018	2019	2020	2021
Aqua	17.5	22.5	14.6	13.7
PAWC	24.4	20.6	12.0	16.1
Large Class A Average	**22.4**	**21.2**	**12.5**	**15.4**
Audubon	21.0	24.5	9.0	17.6
Columbia	3.0	1.0	5.0	7.0
Community Utilities	16.6	4.5	7.4	0.0
Newtown Artesian	1.0	0.0	0.0	6.0
Veolia Bethel	0.0	0.0	27.0	0.0
Veolia PA	25.2	30.5	29.0	25.6
York	3.9	4.4	10.0	6.8
"Other Class A" Average*	**16.7**	**20.1**	**16.2**	**20.1**
All Class A Average**	**22.0**	**21.1**	**12.9**	**15.7**

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

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

- Average response time includes all residential Class A water Consumer Complaints except complaints processed through CURE.

- The Large Class A water utility average response time decreased from 22.4 days in 2018 to 12.5 days in 2020, followed by an increase to 15.4 days in 2021.

Payment Arrangement Requests

During 2020, BCS handled 668 PARs from residential water customers of the various water utilities. The major Class A water utilities represented 93% (622) of the total PARs.

During 2021, BCS handled 1,578 PARs from residential water customers of the various water utilities. The major Class A water utilities represented 97% (1,536) of the total PARs.

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

The following tables show the PAR Rate, the Justified PAR Rate, and the Percent of Justified PARs. The PAR rate is the number of PARs for each 1,000 residential customers. The justified PAR rate is the estimated number of justified PARs for each 1,000 residential customers based on a statistically valid sampling of complaints. A complaint is considered "justified" if it is found that the utility did not comply with Commission Orders, policies, regulations, reports, Secretarial Letters, or tariffs. The percent of justified PARs is the estimated number of justified complaints divided by the total number of complaints received (multiplied by 100). BCS evaluates a statistically valid sampling of complaints for each utility.

2020 - 2021 Residential Payment Arrangement Request (PAR) Rates, Justified PAR Rates, and Percent of Justified PARs Major Class A Water Utilities

Utility	PAR Rate	Justified PAR Rate	Percent of Justified PARs
2020			
Aqua	0.28	0.01	4.4%
PAWC	0.75	0.12	16.0%
Large Class A Average	**0.51**	**0.07**	**13.7%**
Audubon	0.00	0.00	0.0%
Columbia	0.61	0.20	33.3%
Community Utilities	0.76	0.00	0.0%
Newtown Artesian	0.00	0.00	0.0%
Veolia Bethel	0.00	0.00	0.0%
Veolia PA	0.19	0.00	0.0%
York	0.33	0.00	0.0%
"Other Class A" Average*	**0.27**	**0.02**	**5.0%**
All Class A Average**	**0.43**	**0.05**	**13.2%**
2021			
Aqua	0.62	0.10	15.5%
PAWC	1.93	0.21	10.9%
Large Class A Average	**1.27**	**0.15**	**11.7%**
Audubon	0.00	0.00	0.0%
Columbia	0.51	0.00	0.0%
Community Utilities	0.76	0.38	50.0%
Newtown Artesian	0.10	0.00	0.0%
Veolia Bethel	0.00	0.00	0.0%
Veolia PA	0.50	0.09	17.2%
York	0.39	0.00	0.0%
"Other Class A" Average*	**0.42**	**0.05**	**9.7%**
All Class A Average**	**0.99**	**0.12**	**11.6%**

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

- The PAR rate equals the number of PARs for each 1,000 residential customers.
- The justified PAR rate equals the estimated number of justified PARs for each 1,000 residential customers. The justified rate is a normalized ratio useful for comparing utility performance among the various companies.
- The percent of justified PARs is the estimated number of justified complaints divided by the total number of complaints received. (BCS evaluates a statistically valid sampling of complaints for each utility.)
- The following table presents the number of PARs and the PAR rate for each major Class A water utility in 2018, 2019, 2020 and 2021.

2018-21 Residential Payment Arrangement Request (PAR) Numbers/Rates Major Class A Water Utilities

Utility	2018		2019		2020		2021	
	Number	Rate	Number	Rate	Number	Rate	Number	Rate
Aqua	591	1.47	529	1.31	113	0.28	252	0.62
PAWC	3,248	5.33	2,766	4.51	469	0.75	1,222	1.93
Large Class A Total	**3,839**		**3,295**		**582**		**1,474**	
Large Class A Average of Rates		**3.40**		**2.91**		**0.51**		**1.27**
Audubon	1	0.37	0	0.00	0	0.00	0	0.00
Columbia	28	2.90	30	3.08	6	0.61	5	0.51
Community Utilities	4	1.52	2	0.76	2	0.76	2	0.76
Newtown Artesian	0	0.00	1	0.10	0	0.00	1	0.10
Veolia Bethel	0	0.00	0	0.00	0	0.00	0	0.00
Veolia PA	52	0.95	48	0.85	11	0.19	29	0.50
York	81	1.31	80	1.29	21	0.33	25	0.39
"Other Class A" Total	**166**		**161**		**40**		**62**	
"Other Class A" Avg. of Rates*		**1.16**		**1.11**		**0.27**		**0.42**
All Class A Total	**4,005**		**3,456**		**622**		**1,536**	
All Class A Average of Rates**		**2.65**		**2.31**		**0.43**		**0.99**

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

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

2018-21 Justified Residential Payment Arrangement Request (PAR) Numbers/Rates
Major Class A Water Utilities

Utility	2018		2019		2020		2021	
	Number**	Rate	Number**	Rate	Number**	Rate	Number**	Rate
Aqua	58	0.14	45	0.11	5	0.01	39	0.62
PAWC	642*	1.05*	669*	1.09*	75	0.12	133*	1.93*
Large Class A Total	**700**		**714**		**80**		**172**	
Large Class A Average of Rates		**0.60**		**0.60**		**0.07**		**1.27**
Audubon	0	0.00	0	0.00	0	0.00	0	0.00
Columbia	0	0.00	0	0.00	2	0.20	0	0.51
Community Utilities	0	0.00	0	0.00	0	0.00	1	0.76
Newtown Artesian	0	0.00	0	0.00	0	0.00	0	0.10
Veolia Bethel	0	0.00	0	0.00	0	0.00	0	0.00
Veolia PA	2	0.04	0	0.00	0	0.00	5	0.50
York	3	0.05	2	0.03	0	0.00	0	0.39
"Other Class A" Total	**5**		**2**		**2**		**6**	
"Other Class A" Avg. of Rates* **		**0.03**		**0.01**		**0.02**		**0.42**
All Class A Total	**705**		**716**		**82**		**178**	
All Class A Average of Rates** **		**0.41**		**0.41**		**0.05**		**0.99**

* Based on a probability sample of complaints.
** Estimated based on the number of complaints in CSIS: 2018 as of June 21, 2019; 2019 as of July 10, 2020; 2020 as of June 4, 2021; and 2021 as of Sept. 10, 2022.
*** Calculated based on the rate of "Other Class A" utilities as a whole.
**** Calculated based on the rates of Aqua, PAWC, and "Other Class A" utilities as a whole.

- The justified PAR rate equals the estimated number of justified PARs for each 1,000 residential customers. It is not a percentage.

- The following table presents the percent of justified PARs for each Class A water utility in 2018, 2019, 2020 and 2021.

2018-21 Number/Percent of Justified Residential Payment Arrangement Requests (PARs) Major Class A Water Utilities

Utility	2018		2019		2020		2021	
	Number**	Percent	Number**	Percent	Number**	Percent	Number**	Percent
Aqua	58	9.8%	45	8.5%	5	4.4%	39	15.5%
PAWC	642*	19.8%	669*	24.2%	75	16.0%	133*	10.9%
Large Class A Total	**700**		**714**		**80**		**172**	
Large Class A Average		**18.2%**		**21.7%**		**13.7%**		**11.7%**
Audubon	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Columbia	0	0.0%	0	0.0%	2	33.3%	0	0.0%
Community Utilities	0	0.0%	0	0.0%	0	0.0%	1	50.0%
Newtown Artesian	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Veolia Bethel	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Veolia PA	2	3.8%	0	0.0%	0	0.0%	5	17.2%
York	3	3.7%	2	2.5%	0	0.0%	0	0.0%
"Other Class A" Total	**5**		**2**		**2**		**6**	
"Other Class A" Average* **		**3.0%**		**1.2%**		**5.0%**		**9.7%**
All Class A Total	**705**		**716**		**82**		**178**	
All Class A Average** **		**17.6%**		**20.7%**		**13.2%**		**11.6%**

* Based on a probability sample of complaints.
** Estimated based on the number of complaints in CSIS: 2018 as of June 21, 2019; 2019 as of July 10, 2020; 2020 as of June 4, 2021; and 2021 as of Sept. 10, 2022.
*** Calculated based on the rate of "Other Class A" utilities as a whole.
**** Calculated based on the rates of Aqua, PAWC, and "Other Class A" utilities as a whole.

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

2018-21 Average Response Time to BCS Residential Payment Arrangement Requests (PARs) Major Class A Water Utilities

Utility	Number of Days			
	2018	2019	2020	2021
Aqua	9.5	15.6	14.4	6.2
PAWC	16.7	12.3	8.9	8.4
Large Class A Average	**15.4**	**13.0**	**7.3**	**8.5**
Audubon	8.0	0.0	0.0	0.0
Columbia	6.1	10.3	5.4	10.7
Community Utilities	11.5	5.0	3.5	3.5
Newtown Artesian	0.0	5.0	0.0	30.0
Veolia Bethel	0.0	0.0	0.0	0.0
Veolia PA	17.8	29.7	24.3	18.5
York	2.1	4.0	3.6	4.7
"Other Class A" Average*	**8.4**	**11.9**	**9.9**	**12.8**
All Class A Average**	**15.1**	**13.0**	**7.5**	**8.7**

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

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

- The calculation for average response excludes undisputed PARs and CURE complaints.

- In 2020, Aqua's response time increased by 4.9 days from 2018 to 14.4 days, while PAWC's response time decreased by 7.8 days to 8.9 days. Then in 2021, Aqua's response time decreased by 8.2 days from 2020 to 6.2 days, while PAWC's response time decreased by 0.5 days to 8.4 days.

Termination and Reconnection of Service

Each month, the water utilities report to the Commission the number of residential accounts they terminated for nonpayment during the previous month. They also report the number of previously terminated residential accounts 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 utility to utility, depending on a variety of factors. The water utility 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 arrangement for the balance owed to the utility or presents a medical certificate. The tables that follow indicate the annual number of residential accounts each

of the major Class A water utilities terminated and reconnected in 2018, 2019, 2020 and 2021. The first table also presents the termination rates for each of these utilities.

Residential Service Terminations/Termination Rates
Major Class A Water Utilities

Utility	Residential Service Terminations				Termination Rates			
	2018	2019	2020	2021	2018	2019	2020	2021
Aqua	7,415	7,125	1,255	7,070	1.85	1.76	0.31	1.70
PAWC	24,695	22,749	1,580	20,340	4.06	3.71	0.25	3.21
Large Class A Total	**32,110**	**29,874**	**2,835**	**27,410**				
Large Class A Average of Rates					**2.96**	**2.74**	**0.28**	**2.46**
Audubon	0	13	0	7	0.00	0.48	0.00	0.26
Columbia	241	240	59	132	2.49	2.47	0.60	1.34
Community Utilities	157	158	55	25	5.98	6.00	2.08	0.94
Newtown Artesian	43	33	0	18	0.46	0.34	0.00	0.19
Veolia Bethel	0	0	0	0	0.00	0.00	0.00	0.00
Veolia PA	372	534	82	367	0.68	0.95	0.14	0.63
York	1,121	883	179	495	1.82	1.42	0.29	0.78
"Other Class A" Total	**1,934**	**1,861**	**375**	**1,044**				
"Other Class A" Average of Rates*					**2.45**	**1.28**	**0.26**	**0.59**
All Class A Total	**34,044**	**31,735**	**3,210**	**28,454**				
All Class A Average of Rates**					**2.79**	**2.25**	**0.27**	**1.83**

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

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

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

Residential Service Reconnections
Major Class A Water Utilities

Utility	2018	2019	2020	2021
Aqua	5,898	5,135	619	5,090
PAWC	20,974	18,620	1,873	14,239
Large Class A Total	**26,872**	**23,755**	**2,492**	**19,329**
Audubon	0	10	0	5
Columbia	167	183	46	118
Community Utilities	59	102	51	15
Newtown Artesian	37	32	0	13
Veolia Bethel	0	0	0	0
Veolia PA	177	198	72	180
York	763	509	117	217
"Other Class A" Total	**1,203**	**1,034**	**286**	**548**
All Class A Total	**28,075**	**24,789**	**2,778**	**19,877**

- Due to the Covid 19 pandemic, residential terminations were suspended from Mar. 13, 2020, to Mar. 31, 2021. Utilities were encouraged to reconnect residential customers for health and safety reasons. This significantly impacted 2020 numbers for both terminations and reconnections.

Compliance

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

The infraction rates in the table that follows are based on the review of informal complaints that residential consumers filed with BCS from 2018 through 2021. The Infraction Category tables present detailed information about the infractions identified in 2020 and 2021 complaints to the BCS.

Commission Infraction Rates
Major Class A Water Utilities

Utility	2018	2019	2020	2021
Aqua	0.31	0.14	0.08	0.12
PAWC	0.26	0.22	0.06	0.24
Audubon	0.00	0.00	0.00	0.00
Columbia	0.10	0.00	0.10	0.00
Community Utilities	0.00	0.00	0.00	0.76
Newtown Artesian	0.11	0.00	0.00	0.00
Veolia Bethel	0.00	0.00	0.82	0.00
Veolia PA	0.18	0.12	0.02	0.22
York	0.03	0.02	0.00	0.00

- The infraction rate is the number of informally verified infractions per 1,000 residential customers. Dividing per 1,000 customers normalizes the data for comparison purposes. The infraction rate is not a percentage.
- The tables below present the actual number of infractions for 2020 and 2021 by category.
- The dispute handling category is consistently a high percentage infraction area.

Number of Major Water Utility Infractions*
2020

Category	Aqua	PAWC	Audubon	Columbia	Community Utilities	Newtown Artesian	Veolia Bethel	Veolia PA	York	Water Total
Billing and Payment	0	2	0	0	0	0	1	0	0	**3**
Meter Reading	1	0	0	0	0	0	0	0	0	**1**
Make-Up Bills	6	2	0	0	0	0	1	0	0	**9**
Transfer of Accounts	0	0	0	0	0	0	0	0	0	**0**
Credit Standards and Deposits	0	5	0	0	0	0	0	0	0	**5**
Termination Grounds	0	0	0	0	0	0	0	0	0	**0**
Termination Procedures	2	2	0	0	0	0	0	0	0	**4**
Reconnection of Service	0	2	0	1	0	0	0	0	0	**3**
Liability – Responsibility for Bills	0	0	0	0	0	0	0	0	0	**0**
Landlord/Ratepayer	0	0	0	0	0	0	0	0	0	**0**
Dispute Handling	9	21	0	0	0	0	0	0	0	**30**
Other	15	6	0	0	0	0	0	1	0	**22**
Total	**33**	**40**	**0**	**1**	**0**	**0**	**2**	**1**	**0**	**77**

* The number of verified infractions identified by BCS as of Aug. 26, 2021.

- The table above presents the actual number of infractions for 2020 by category.
- Dispute handling is generally a complaint category that has a high volume of infractions.
- Appendix B-1 provides a list of the infractions included in each infraction category.

Number of Major Water Utility Infractions*
2021

Category	Aqua	PAWC	Audubon	Columbia	Community Utilities	Newtown Artesian	Veolia Bethel	Veolia PA	York	Water Total
Billing and Payment	1	0	0	0	0	0	0	1	0	**2**
Meter Reading	2	2	0	0	0	0	0	0	0	**4**
Make-Up Bills	3	5	0	0	0	0	0	1	0	**9**
Transfer of Accounts	0	1	0	0	0	0	0	0	0	**1**
Credit Standards and Deposits	1	12	0	0	0	0	0	0	0	**13**
Termination Grounds	4	18	0	0	0	0	0	1	0	**23**
Termination Procedures	2	4	0	0	1	0	0	1	0	**8**
Reconnection of Service	2	6	0	0	0	0	0	2	0	**10**
Liability – Responsibility for Bills	0	0	0	0	0	0	0	0	0	**0**
Landlord/Ratepayer	0	4	0	0	0	0	0	0	0	**4**
Dispute Handling	19	65	0	0	0	0	0	3	0	**87**
Other	17	32	0	0	1	0	0	4	0	**54**
Total	**51**	**149**	**0**	**0**	**2**	**0**	**0**	**13**	**0**	**215**

* The number of verified infractions identified by BCS as of May 2, 2022.

- The table above presents the actual number of infractions for 2021 by category.
- Dispute handling is generally a complaint category that has a high volume of infractions.
- Appendix B-1 provides a list of the infractions included in each infraction category.

Percent of Major Water Utility Infractions*
2020

Category	Aqua	PAWC	Audubon	Columbia	Community Utilities	Newtown Artesian	Veolia Bethel	Veolia PA	York	Water Average
Billing and Payment	0%	5%	0%	0%	0%	0%	50%	0%	0%	**6%**
Meter Reading	3%	0%	0%	0%	0%	0%	0%	0%	0%	**0%**
Make-Up Bills	18%	5%	0%	0%	0%	0%	50%	0%	0%	**8%**
Transfer of Accounts	0%	0%	0%	0%	0%	0%	0%	0%	0%	**0%**
Credit Standards and Deposits	0%	13%	0%	0%	0%	0%	0%	0%	0%	**1%**
Termination Grounds	0%	0%	0%	0%	0%	0%	0%	0%	0%	**0%**
Termination Procedures	6%	5%	0%	0%	0%	0%	0%	0%	0%	**1%**
Reconnection of Service	0%	5%	0%	100%	0%	0%	0%	0%	0%	**12%**
Liability – Responsibility for Bills	0%	0%	0%	0%	0%	0%	0%	0%	0%	**0%**
Landlord/Ratepayer	0%	0%	0%	0%	0%	0%	0%	0%	0%	**0%**
Dispute Handling	27%	53%	0%	0%	0%	0%	0%	0%	0%	**9%**
Other	45%	15%	0%	0%	0%	0%	0%	100%	0%	**18%**

* The number of verified infractions identified by BCS as of Aug. 26, 2021.

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

Percent of Major Water Utility Infractions*
2021

Category	Aqua	PAWC	Audubon	Columbia	Community Utilities	Newtown Artesian	Veolia Bethel	Veolia PA	York	Water Average
Billing and Payment	2%	0%	0%	0%	0%	0%	0%	8%	0%	**1%**
Meter Reading	4%	1%	0%	0%	0%	0%	0%	0%	0%	**1%**
Make-Up Bills	6%	3%	0%	0%	0%	0%	0%	8%	0%	**2%**
Transfer of Accounts	0%	1%	0%	0%	0%	0%	0%	0%	0%	**0%**
Credit Standards and Deposits	2%	8%	0%	0%	0%	0%	0%	0%	0%	**1%**
Termination Grounds	8%	12%	0%	0%	0%	0%	0%	8%	0%	**3%**
Termination Procedures	4%	3%	0%	0%	50%	0%	0%	8%	0%	**7%**
Reconnection of Service	4%	4%	0%	0%	0%	0%	0%	15%	0%	**3%**
Liability – Responsibility for Bills	0%	0%	0%	0%	0%	0%	0%	0%	0%	**0%**
Landlord/Ratepayer	0%	3%	0%	0%	0%	0%	0%	0%	0%	**0%**
Dispute Handling	37%	44%	0%	0%	0%	0%	0%	23%	0%	**12%**
Other	33%	21%	0%	0%	50%	0%	0%	31%	0%	**15%**

* The number of verified infractions identified by BCS as of May 2, 2022.

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

Municipal Water and Sewer

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

Act 65 established a process to transition PWSA to Commission regulation. For example, the law authorized PWSA to continue to provide service to its customers in accordance with their prior tariff until a new tariff was approved and effective. On Feb. 27, 2019, the Commission entered an Opinion and Order at Docket Nos. R-2018-3002645 (water) and Docket No. R-2018-3002647 (wastewater), which approved the new PWSA tariffs, effective Mar. 1, 2019.

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

On Feb. 4, 2021, the Commission issued a final Order concluding the Stage 1 Compliance Plan review proceeding. Pursuant to direction provided in a Jan. 24, 2020, Secretarial Letter, PWSA filed covers the Stage 2 Compliance Plan: Chapters 14 & 56, Discontinuance of Services to Leased Premises Act (DSLPA) on Apr. 9, 2021, which commenced the Stage 2 review proceeding to these filings, on Jan. 20, 2022, PWSA submitted a revised Stage 2 Compliance Plan: Stormwater.

On March 7, 2022, the Commission issued an order in response to a petition from PWSA that separated stormwater compliance issues from the customer service and collections issues of the Stage 2 Compliance Plan proceeding. Relevant details from these proceedings are as follows:

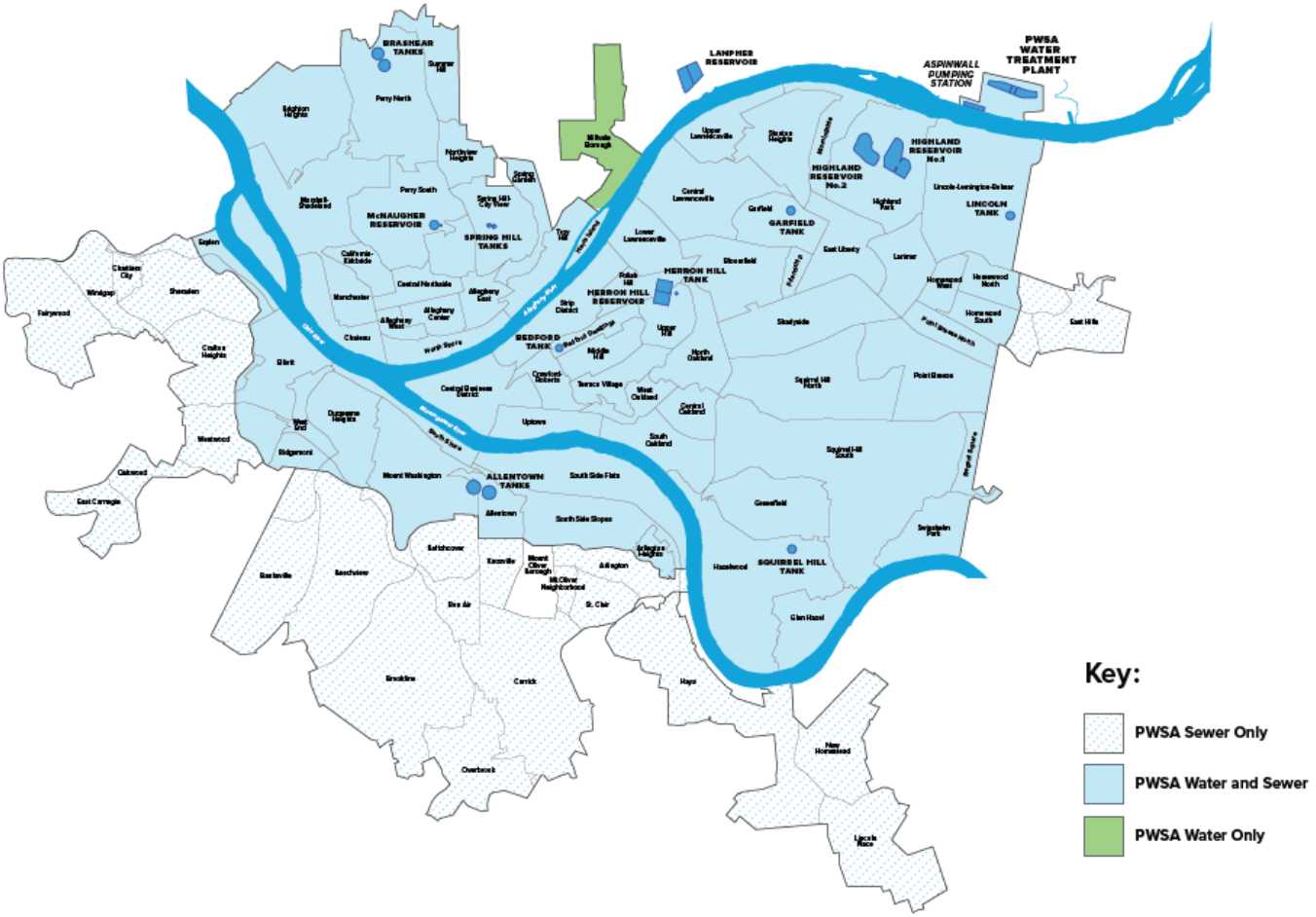
Stage 2 Compliance Plan: Chapters 14 & 56, DSLPA and Collections: On March 14, 2022, a Joint Petition for Settlement Regarding PWSA's April 9, 2021, Stage 2 Compliance Plan: Chapters 14 & 56, DSLPA and Collections was filed by the Pittsburgh Water and Sewer Authority, the PUC's Bureau of Investigation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

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

In response to the final Orders entered on July 14, 2022, and Aug. 25, 2022, as explained above, PWSA was required to submit Compliance Tariffs that reflect the stipulations in each of the final Orders. By Secretarial Letter dated Nov. 17, 2022, the PUC announced that Supplement No. 1 to Tariff Storm Water – Pa. P.U.C. No. 1 was effective on November 2, 2022. As of the date of this report, PUC action on the Supplement No. 10 to Tariff Water – Pa. P.U.C. No. 1 and Supplement No. 10 to Tariff Wastewater – Pa. P.U.C. No. 1 are pending.

PWSA is the largest combined water and sewer authority in Pennsylvania and currently serves over 97,800 residential customers throughout the City of Pittsburgh and surrounding communities. In addition to providing water and wastewater collection services, PWSA provides wastewater conveyance to city residents served by the Pennsylvania-American Water Co. and provides water to Millvale Borough residents, whose water system was acquired by the Authority in 2009. The map below provides a detailed illustration of the territory currently served by PWSA. It is important to note that PWSA also provides billing services for the ALCOSAN, whose charges for sewage treatment appear on the billing statements of PWSA customers.

PWSA Service Areas



Given its divergent services and customer base, PWSA regulation is often complex. For these reasons, the PWSA informal complaint data presented in this chapter are designated as PWSA-Water or PWSA-Sewer based upon the nature of the complaint. As an example, a PWSA-Sewer complaint may involve the sewer service, but the customer may receive both water and sewer bills or just a sewer bill from PWSA.

The data provided in the tables below include PWSA informal complaint activity for 2020 and 2021. It should be clarified that while PUC regulatory jurisdiction over PWSA was not effective until Apr. 1, 2018, BCS received contacts about PWSA prior to this effective date. Those contacts to BCS prior to Apr. 1, 2018, were tracked and categorized as FCRs. All contacts received by BCS after Apr. 1, 2018, were designated as FCRs, Consumer Complaints or PARs, depending upon the nature of the contact with BCS.

In addition to the above clarification, it is important to note that data on PWSA infractions is not provided in this section as it is for the major water utilities. PWSA's transition to PUC regulation is ongoing, as

described above; therefore, it is premature for BCS to report this data. BCS will publish PWSA infraction data in future UCARE reports.

Total Complaint Rate

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

2018-21 Residential Total Complaint Numbers/Rates
Municipal Water and Sewer Utilities

Utility	2018*		2019		2020		2021	
	Number	Rate	Number	Rate	Number	Rate	Number	Rate
PWSA-Water	440	4.60	380	3.89	273	2.79	276	2.82
PWSA-Sewer	216	2.26	128	1.31	67	0.68	47	0.48
Total	**656**		**508**		**340**		**323**	
Average of Rates		**3.43**		**2.60**		**1.74**		**1.65**

* PWSA came under the Commission's regulatory jurisdiction effective Apr. 1, 2018; therefore, the Consumer Complaint and PAR activity reflected in this table occurred on or after Apr. 1, 2018.

First Contact Resolutions (FCRs)

2018-21 Residential FCRs
Municipal Water and Sewer Utilities

Utility	2018*	2019	2020	2021
PWSA-Water	160	72	69	73
PWSA-Sewer	52	26	11	19
Average	**212**	**98**	**80**	**92**

* PWSA came under the Commission's regulatory jurisdiction effective Apr. 1, 2018; therefore, the Consumer Complaint and PAR activity reflected in this table occurred on or after Apr. 1, 2018.

- PUC regulatory jurisdiction over PWSA was not effective until Apr. 1, 2018; therefore, all contacts about PWSA prior to the effective date were tracked and categorized as FCRs. All contacts received on or after Apr. 1, 2018, were designated as FCRs, Consumer Complaints or PARs, depending upon the nature of the contact with BCS.

Consumer Complaints

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

2018-21 Residential Consumer Complaint Numbers/Rates
Municipal Water and Sewer Utilities

Utility	2018*		2019		2020		2021	
	Number	Rate	Number	Rate	Number	Rate	Number	Rate
PWSA-Water	179	1.87	192	1.96	180	1.84	180	1.84
PWSA-Sewer	87	0.91	55	0.56	37	0.38	20	0.20
Total	**266**		**247**		**217**		**200**	
Average of Rates		**1.39**		**1.26**		**1.11**		**1.02**

* PWSA came under the Commission's regulatory jurisdiction effective Apr. 1, 2018; therefore, the Consumer Complaint and PAR activity reflected in this table occurred on or after Apr. 1, 2018.

2018-21 Average Response Time to BCS
Residential Consumer Complaints
Municipal Water and Sewer Utilities

Utility	Number of Days			
	2018*	2019	2020	2021
PWSA-Water	7.1	8.4	8.8	11.1
PWSA-Sewer	8.1	10.2	8.0	10.1
Average	**7.9**	**8.7**	**8.7**	**11.1**

* PWSA came under the Commission's regulatory jurisdiction effective Apr. 1, 2018; therefore, the Consumer Complaint and PAR activity reflected in this table occurred on or after Apr. 1, 2018.

- Response time is the number of days from the date BCS first contacts the utility regarding a complaint to the date on which the utility provides BCS with its initial informal complaint report. Response time quantifies the speed of a utility's response to BCS PAR complaints.
- The calculation for average response excludes undisputed PARs and CURE complaints.
- The average response time for PWSA increased from 7.9 days in 2018 to 8.7 days in 2020, then increased to 11.1 days in 2021.

Payment Arrangement Requests

2018-21 Residential Payment Arrangement Request (PAR) Rates
Municipal Water and Sewer Utilities

Utility	2018*		2019		2020		2021	
	Number	Rate	Number	Rate	Number	Rate	Number	Rate
PWSA-Water	110	1.15	127	1.30	32	0.33	27	0.28
PWSA-Sewer	80	0.84	48	0.49	21	0.21	8	0.08
Total	**190**		**175**		**53**		**35**	
Average of Rates		**0.99**		**0.90**		**0.27**		**0.18**

* PWSA came under the Commission's regulatory jurisdiction effective Apr. 1, 2018; therefore, the Consumer Complaint and PAR activity reflected in this table occurred on or after Apr. 1, 2018.

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

2018-21 Average Response Time to BCS
Residential Payment Arrangement Requests (PARs)
Municipal Water and Sewer Utilities

Utility	Number of Days			
	2018*	2019	2020	2021
PWSA-Water	8.2	5.7	6.8	8.9
PWSA-Sewer	7.1	7.0	7.1	10.3
Average	**7.4**	**5.6**	**6.6**	**9.5**

* PWSA came under the Commission's regulatory jurisdiction effective Apr. 1, 2018; therefore, the Consumer Complaint and PAR activity reflected in this table occurred on or after Apr. 1, 2018.

- Response time is the number of days from the date BCS first contacts the utility regarding a complaint to the date on which the utility provides BCS with its initial informal complaint report. Response time quantifies the speed of a utility's response to BCS PAR complaints.
- The calculation for average response excludes undisputed PARs and CURE complaints.
- From 2018 to 2020, the average response time for PWSA decreased by 0.8 days, from 7.7 days to 6.9 days, then increased to 9.5 days in 2021.

Termination and Reconnection of Service

Residential Service Terminations/Termination Rates
Municipal Water and Sewer Utilities

Utility	Residential Service Terminations				Termination Rates			
	2018*	2019	2020	2021	2018*	2019	2020	2021
PWSA	1,622	2,437	206	177	1.70	2.49	0.21	0.18

* PWSA came under the Commission's regulatory jurisdiction effective Apr. 1, 2018; therefore, the termination and reconnection activity reflected in this table occurred on or after Apr. 1, 2018.

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

Residential Service Reconnections
Municipal Water and Sewer Utilities

Utility	2018*	2019	2020	2021
PWSA	1,261	2,029	137	257

* PWSA came under the Commission's regulatory jurisdiction effective Apr. 1, 2018; therefore, the termination and reconnection activity reflected in this table occurred on or after Apr. 1, 2018.

- The number of PWSA reconnections represents the total number of residential customers who were reconnected. This total includes customers who received combined water and sewer services, customers who only received sewer service and those customers who received water service only.
- Due to the Covid 19 pandemic, residential terminations were suspended from Mar. 13, 2020 to Mar. 31, 2021. Utilities were encouraged to reconnect residential customers for health and safety reasons. This significantly impacted 2020 numbers for both terminations and reconnections.

Programs That Assist Low-Income Customers

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

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

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

At the end of December 2020, there were 1,387 active participants in the Helping Hand program. The company provided $329,628 in arrearage forgiveness credits to 1,454 program participants.

At the end of December 2021, there were 778 active participants in the Helping Hand program. The company provided $124,900 in arrearage forgiveness credits to 1,179 program participants.

Pennsylvania American Water Co. (PAWC) – In 1991, PAWC established the "Help to Others" (H2O) program. Beginning Mar. 8, 2021, the H2O program increased the benefit to its water customers by providing an 85% discount on their monthly service fees – a savings of about $14.45 per month in 2020 and $14.88 per month in 2021 with a 10% discount on their volumetric water usage. In addition to a discount for water, PAWC increased the discount for wastewater customers. A 30% discount was provided on the total wastewater billing for customers who qualified. There were 25,428 customers in 2020 and 26,246 customers in 2021 who were billed at the discounted rate (as of March 2021 and December 2021, respectively).

The H2O program also provides water-saving devices and conservation education. Over 1,600 income-eligible customers during the 2020 calendar year and 1,700 income-eligible customers in 2021 were provided with water-saving devices.

As part of the H2O program, PAWC participates with the Dollar Energy Fund to provide cash grants of up to $500 per year for qualifying water and wastewater customers. Dollar Energy Fund is a hardship fund administrator that provides cash assistance to utility customers who need help in paying their utility bills. As of March 2021, PAWC increased its annual contribution for grants to income-eligible water customers from $400,000 to $500,000. The company's contribution for wastewater grants to income-eligible customers increased from $50,000 to $100,000.

During the 2020 calendar year, PAWC's shareholders and customers provided $337,361 in hardship fund benefits to 1,052 customers for an average benefit of $320.69. In addition, PAWC's shareholders provided $35,861 in grants for the 2020 calendar year for wastewater customers. The funds provided benefits to 112 customers for an average benefit of $320.19.

During the 2021 calendar year, PAWC's shareholders and customers provided $571,271 in hardship fund benefits to 1,583 customers for an average benefit of $360.88. In addition, PAWC's shareholders

provided $90,737 in grants for the 2021 calendar year for wastewater customers. The funds provided benefits to 227 customers for an average benefit of $399.72.

Pittsburgh Water and Sewer Authority (PWSA) – PWSA contracts with the Dollar Energy Fund to administer its several customer assistance programs. The Bill Discount Program provides a percentage-based reduction of fixed monthly water and wastewater conveyance charges for customers who are at or below 150% of the Federal Poverty Level. In 2020, bill discounts remained at 75%, and 4,228 customers were enrolled in the Bill Discount Program at a savings of $26.66 per month. In 2021, bill discounts increased to 100% of the fixed monthly water and wastewater conveyance base charges, and 5,217 customers were enrolled in the Bill Discount Program. As part of its response to the COVID-19 pandemic and PWSA's 2020 Rate Case Settlement, PWSA allowed all eligible customers to remain in the Bill Discount Program without recertification throughout 2020 and 2021, even if they had exceeded twelve months of discounts. Following this period, customers will need to recertify for the Bill Discount Program every two years.

The Hardship Grant Program extends cash grants up to $300 per year for water customers who are at or below 150% of the Federal Poverty Level. Seeing that this program was impacted by the moratorium on terminations, PWSA began to accept grant applications without a termination notice in the fourth quarter of 2020. In 2020, PWSA provided $6,607 in cash grants to 26 water customers for an average benefit of $254. In 2021, PWSA provided $80,394.90 in cash grants to 301 customers for an average benefit of $267.09.

The Winter Moratorium provides qualifying customers who are at or below 300% of the Federal Poverty Level with the assurance that their water service will not be terminated due to non-payment from December 1 through March 31. Due to its pandemic response, PWSA extended this protection to all residential customers, regardless of income, throughout 2020.

The Private Lead Line Replacement Community Environmental Project (CEP) offered private side lead line replacements for customers who are at or below 300% of the Federal Poverty Level. PWSA started CEP construction in late 2018 and the program was completed in early 2021. Private side service line materials were funded by a $1.8 million settlement with the Pennsylvania Department of Environmental Protection. During the program, PWSA worked at 732 locations, verified that 308 of these locations did not have either public or private lead service lines, and replaced 389 private and 288 public lead service lines. A total of over $4.3 million was spent on the program, including the $1.8 million associated with the private lead service lines. In October 2020, PWSA rolled out a Line Replacement Reimbursement Program. This income-based reimbursement program provides for 100% reimbursement for private side lead service line replacement costs for customers who are at or below 300% of the Federal Poverty Level, with a decreasing reimbursement percentage to 500% of the Federal Poverty Level, after which water customers are eligible for a $1,000 stipend if they hire a private plumber and replace their own private lead service line.

PWSA customers who are billed for sewage treatment are also eligible for assistance through ALCOSAN's Clean Water Assistance Fund. This program follows the same income requirements as PWSA's Bill Discount Program and allotted a $34 credit in the first three quarters of 2020 and a $35 credit in the fourth quarter of 2020, providing $172,283 in grants to 5,030 PWSA customers in 2020. In 2021, a $35 credit was allotted in the first three quarters of 2021 and a $40 credit in the fourth quarter of 2021, providing $164,000 in grants to 4,520 PWSA customers.

Veolia Water Pennsylvania (Veolia Water PA) – Veolia Water PA implemented the "Suez Cares" program in 2005. Suez 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 $150 are provided to qualifying customers who are first screened by the Salvation Army for eligibility. To be eligible for a grant, customers must have made a

nominal payment within the last 90 days. During the 2020 program year, the utility provided grants totaling $6,991 to qualifying customers. During the 2021 program year, the utility provided grants totaling $14,950 to qualifying customers.

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

The utility expended $416 in 2020 and $753 in 2021 for customer plumbing repairs and enrolled a total of four new customers in 2020 and six in 2021 in the York Water Cares program. As of program end 2020, four customers received arrearage forgiveness benefits totaling $210 for an average benefit of approximately $52 per customer. As of program end 2021, seven customers received arrearage forgiveness benefits totaling $330 for an average benefit of approximately $47 per customer. The utility anticipates an annual savings of $240 in 2020 and $420 in 2021 in costs for termination proceedings that may be avoided as a result of customer participation in the York Water Cares program.

10. Telecommunications Industry

During 2020 and 2021, BCS handled Consumer Complaints related to basic voice service, broadband, Lifeline, payment arrangement requests (PARs) and FCRs from the customers of a variety of telecommunications service providers, including incumbent local exchange carriers (ILECs), competitive local exchange carriers (CLECs), long-distance companies, resellers and wireless eligible telecommunications carriers (Wireless ETCs).

In 2020, there were 543 providers of telecommunications services with certificates of public convenience in Pennsylvania. Of these, 37 were ILECs. The ILECs included 32 non-major utilities that each served less than 50,000 residential customers and five major utilities that each served over 50,000 residential customers. In 2020, based on §64.201 reporting, Pennsylvania local exchange carriers supplied wireline service to an average of 1,005,842 residential telecommunications service access lines each month.

In 2021, there were 543 providers of telecommunications services with certificates of public convenience in Pennsylvania. Of these, 35 were ILECs. The ILECs included 30 non-major utilities that each served less than 50,000 residential customers and five major utilities that each served over 50,000 residential customers. In 2021, based on §64.201 reporting, Pennsylvania local exchange carriers supplied service to an average of 889,314 residential telecommunications service access lines each month.

Because the five major ILECs provided voice telecommunications service to the vast majority of those telecommunications access service lines (an average of 851,784 residential service lines each month in 2020 and 759,244 in 2021), this chapter will focus on the five major ILECs – CenturyLink (**CenturyLink**), Frontier Communications Commonwealth Telephone Co. (**Frontier Commonwealth**), Verizon North LLC (**Verizon North**), Verizon Pennsylvania LLC (**Verizon PA**), and Windstream Communications (**Windstream**).

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

The vast majority of broadband related informal complaints received by BCS also include a dispute regarding voice telecommunications service. For tracking and evaluative purposes, BCS assigns a telecommunications quality of service "reason for contact" code to these complaints. The complaints are tracked by placing a broadband speed, access or availability dispute code on the complaint; however, no other indication of the specific Chapter 30 issue is tracked at this time.

UCARE also provides information about the number of informal telecommunications complaints that include a Chapter 30 related broadband dispute and the percentage of those complaints compared to the ILECs total number of informal complaints. When BCS identifies instances when the ILEC may have failed to meet their Chapter 30 obligations, the ILEC is notified of the infraction. These informal infractions are reported later in this chapter in the Infraction Categories tables.

Unlike the electric, gas, and water chapters, the analyses of the five utilities that appear in this chapter include complaints about competition-related issues such as slamming, competition-related service

complaints and billing problems. This is the 18th year that competition-related complaints are included in the analyses of the telecommunications utilities.

Act 183 of 2004 replaced the original Chapter 30 that expired due to the sunset provisions included in the Act. Among other issues, it provided the opportunity for an ILEC to petition the Commission for a determination of the competitive status of its services that are also offered by other providers. On Mar. 4, 2015, the Commission entered an Opinion and Order at Docket Nos. P-2014-2446303 and P-2014-2446304, which granted competitive reclassification for basic local exchange telecommunications services in 153 of the 504 Verizon PA and Verizon North wire centers throughout the state.[11] The reclassification temporarily waived certain sections of 52 Pa. Code, Chapters 63[12] and 64[13] for a maximum of five years or until the Commission promulgates a final rulemaking addressing competitive reclassification. On Feb. 27, 2020, the Commission issued an order extending the temporary waivers from Mar. 4, 2020, to Dec. 31, 2022, or until the issuance of final-form regulations in a pending rulemaking, whichever is earlier. On Sept. 21, 2020, the Commission issued a proposed Notice of Proposed Rulemaking (NOPR) addressing the temporary waiver. The NOPR proposes further modifications of the Commission's telecommunications regulations in Chapters 53, 63 and 64.

The Automatic Customer Transfer (also known as Warm Transfer) process is a voluntary complaint resolution program. Only Verizon and Frontier telecommunications utilities participated in the Warm Transfer process during this timeframe (Verizon participated throughout 2020 and 2021; however, Frontier started participating in October 2021). When a complainant contacts BCS to file an informal complaint involving Verizon or Frontier, the customer is offered an opportunity for a "warm transfer" back to the utility to attempt to resolve the complaint one last time directly with the utility. If the utility resolves the complaint to the customer's satisfaction, the utility submits a report to BCS and the informal complaint is withdrawn or closed. BCS may ask for additional information from the utility if the customer is not satisfied and the case will be investigated further by BCS staff.

Total Complaint Rate

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

[11] See Appendix B of Docket Nos. P-2014-2446303 and P-2014-2446304, Mar. 4, 2015.
[12] See Appendix D of Docket Nos. P-2014-2446303 and P-2014-2446304, Mar. 4, 2015.
[13] See Appendix E of Docket Nos. P-2014-2446303 and P-2014-2446304, Mar. 4, 2015.

2018-21 Residential Total Complaint Numbers/Rates
Major Local Telecommunications Utilities

Utility	2018		2019		2020		2021	
	Number	Rate	Number	Rate	Number	Rate	Number	Rate
CenturyLink	231	2.02	77	0.72	75	0.74	233	2.47
Frontier Commonwealth	203	2.32	199	2.49	118	1.60	165	2.43
Verizon North	98	0.91	116	1.02	113	1.09	94	1.04
Verizon PA	1,553	3.04	1,298	2.36	1,114	2.23	1,356	3.17
Windstream	210	2.68	108	1.43	120	1.61	136	1.73
Total	**2,295**		**1,798**		**1,540**		**1,984**	
Average of Rates		**2.55**		**1.94**		**1.81**		**2.61**

Consumer Complaints

Although BCS handled Consumer Complaints about different types of telecommunications service providers in 2020 and 2021, the complaints predominantly came from the residential customers of the five major ILECs.

During 2020, BCS handled 1,238 Consumer Complaints from residential customers of the various telecommunications service providers. The five major ILECs represented 89% (1,104) of the total complaints, while 28 Consumer Complaints were received for the non-major ILECs. In 2020, 63 Consumer Complaints were from residential customers of the CLECs operating in Pennsylvania, and BCS handled 38 Consumer Complaints regarding wireless ETCs that provide Lifeline services. The remaining Consumer Complaints in 2020 were from residential customers of other telecommunications providers such as long-distance carriers, resellers and Voice over Internet Protocol (VoIP).

During 2021, BCS handled 1,566 Consumer Complaints from residential customers of the various telecommunications service providers. The five major ILECs represented 91% (1,421) of the total complaints, while 18 Consumer Complaints were received for the non-major ILECs. In 2021, 84 Consumer Complaints were from residential customers of the CLECs operating in Pennsylvania, and BCS handled 26 Consumer Complaints regarding wireless ETCs that provide Lifeline services. The remaining Consumer Complaints in 2021 were from residential customers of other telecommunications providers such as long-distance carriers, resellers, and VoIP.

Consumer Complaint Categories

The following tables show the number and percentage of 2020 and 2021 Consumer Complaints in each of the 11 categories used by BCS policy analysts for compliance evaluation.

Number of Consumer Complaints by Dispute Category
2020 Complaints Evaluated*
Major Local Telecommunications Utilities

Categories	Century-Link	Frontier Common-wealth	Verizon North	Verizon PA**	Wind-stream	Telecom-munications Total
Unsatisfactory Service	29	54	57	357	50	**547**
Service Delivery	5	6	4	40	14	**69**
Billing Disputes	3	7	4	25	3	**42**
Service Terminations	1	2	0	4	3	**10**
Discontinuance/Transfer	1	0	0	5	0	**6**
Competition	0	0	0	2	2	**4**
Annoyance Calls	1	0	0	2	0	**3**
Credit and Deposits	2	0	0	1	0	**3**
Non-Recurring Charges	0	0	1	1	0	**2**
Toll Services	0	0	0	0	0	**0**
All Other Problems	2	4	2	70	10	**88**
Total-Number*	**44**	**73**	**68**	**507**	**82**	**774**

*Based on residential complaints opened in 2020 and evaluated by BCS as of June 4, 2021.
**Based on a probability sample of complaints.

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

Number of Consumer Complaints by Dispute Category
2021 Complaints Evaluated*
Major Local Telecommunications Utilities

Categories	Century-Link	Frontier Common-wealth	Verizon North	Verizon PA**	Wind-stream	Telecom-munications Total
Unsatisfactory Service	116	75	35	277	59	**562**
Billing Disputes	6	8	9	54	8	**85**
Service Delivery	8	7	1	24	10	**50**
Service Terminations	0	2	0	12	2	**16**
Discontinuance/Transfer	0	0	1	9	0	**10**
Credit and Deposits	0	0	0	2	0	**2**
Competition	0	0	0	1	0	**1**
Non-Recurring Charges	0	0	0	1	0	**1**
Annoyance Calls	0	0	0	0	0	**0**
Toll Services	0	0	0	0	0	**0**
All Other Problems	20	12	15	85	17	**149**
Total-Number*	**150**	**104**	**61**	**465**	**96**	**876**

*Based on residential complaints opened in 2020 and evaluated by BCS as of Sept. 10, 2022.
**Based on a probability sample of complaints.

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

Percent of Consumer Complaints by Dispute Category
2020 Complaints Evaluated*
Major Local Telecommunications Utilities

Categories	Century-Link	Frontier Common-wealth	Verizon North	Verizon PA**	Wind-stream	Telecom-munications Average
Unsatisfactory Service	66%	74%	84%	70%	61%	**71%**
Service Delivery	11%	8%	6%	8%	17%	**9%**
Billing Disputes	7%	10%	6%	5%	4%	**5%**
Service Terminations	2%	3%	0%	1%	4%	**1%**
Discontinuance/Transfer	2%	0%	0%	1%	0%	**1%**
Competition	0%	0%	0%	<1%	2%	**1%**
Annoyance Calls	2%	0%	0%	<1%	0%	**<1%**
Credit and Deposits	5%	0%	0%	<1%	0%	**<1%**
Non-Recurring Charges	0%	0%	1%	<1%	0%	**<1%**
Toll Services	0%	0%	0%	0%	0%	**0%**
All Other Problems	5%	5%	3%	14%	12%	**11%**
Total-Number*	**44**	**73**	**68**	**507**	**82**	**774**

*Based on residential complaints opened in 2020 and evaluated by BCS as of June 4, 2021.
**Based on a probability sample of complaints.

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

- Of the 774 Consumer Complaints evaluated, the top category of telecommunications complaints for 2020 accounts for over two thirds of the total: 71% unsatisfactory service complaints.

Percent of Consumer Complaints by Dispute Category
2021 Complaints Evaluated*
Major Local Telecommunications Utilities

Categories	Century-Link	Frontier Common-wealth	Verizon North	Verizon PA**	Wind-stream	Telecom-munications Average
Unsatisfactory Service	77%	72%	57%	60%	61%	**64%**
Billing Disputes	4%	8%	15%	12%	8%	**10%**
Service Delivery	5%	7%	2%	5%	10%	**6%**
Service Terminations	0%	2%	0%	3%	2%	**2%**
Discontinuance/Transfer	0%	0%	2%	2%	0%	**1%**
Credit and Deposits	0%	0%	0%	<1%	0%	**<1%**
Competition	0%	0%	0%	<1%	0%	**<1%**
Non-Recurring Charges	0%	0%	0%	<1%	0%	**<1%**
Annoyance Calls	0%	0%	0%	0%	0%	**0%**
Toll Services	0%	0%	0%	0%	0%	**0%**
All Other Problems	13%	12%	25%	18%	18%	**17%**
Total-Number*	**150**	**104**	**61**	**465**	**96**	**876**

*Based on residential complaints opened in 2021 and evaluated by BCS as of Sept. 10, 2022.
**Based on a probability sample of complaints.

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

- Of the 876 Consumer Complaints evaluated, the top category of telecommunications complaints for 2021 accounts for over half of the total: 64% unsatisfactory service complaints.

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

The following tables show the Consumer Complaint Rate, the Justified Consumer Complaint Rate, and the Percent of Justified Consumer Complaints. The Consumer Complaint rate is the number of Consumer Complaints for each 1,000 residential customers. The justified Consumer Complaint rate is the estimated number of justified Consumer Complaints for each 1,000 residential customers based on a statistically valid sampling of complaints. A complaint is considered "justified" if it is found that the utility did not comply with Commission Orders, policies, regulations, reports, Secretarial Letters, or tariffs. The percent of justified Consumer Complaints is the estimated number of justified complaints divided by the total number of complaints received (multiplied by 100). BCS evaluates a statistically valid sampling of complaints for each utility.

The 2018, 2019, 2020 and 2021 Consumer Complaint figures for justified Consumer Complaint rates and response times for each of the major telecommunications utilities are presented on the following pages.

2020 and 2021 Residential Consumer Complaint Rates, Justified Consumer Complaint Rates, and Percent of Justified Consumer Complaints Major Local Telecommunications Utilities

Utility	Consumer Complaint Rate	Justified Consumer Complaint Rate	Percent of Justified Consumer Complaints
2020			
CenturyLink	0.50	0.27	52.9%
Frontier Commonwealth	1.13	0.56	49.4%
Verizon North	0.78	0.48	61.7%
Verizon PA	1.59	0.91*	57.4%
Windstream	1.26	0.56	44.7%
Average	**1.05**	**0.56**	**55.8%**
2021			
CenturyLink	1.87	1.12	60.2%
Frontier Commonwealth	1.78	0.94	52.9%
Verizon North	0.78	0.44	57.1%
Verizon PA	2.20	1.21	55.1%
Windstream	1.40	0.61	43.6%
Average	**1.61**	**0.87**	**54.8%**

* Justified Consumer Complaint rate based on a probability sample of complaints.

- The justified Consumer Complaint rate is a normalized ratio useful for comparing utility performance among the various companies. It is not a percentage.
- The percent of justified Consumer Complaints represents a utility's individual performance.
- The following table presents the number of Consumer Complaints and Consumer Complaint rate for each major telecommunications utility in 2018, 2019, 2020 and 2021.

2018-21 Residential Consumer Complaint Numbers/Rates
Major Local Telecommunications Utilities

Utility	2018		2019		2020		2021	
	Number	Rate	Number	Rate	Number	Rate	Number	Rate
CenturyLink	168	1.47	48	0.45	51	0.50	176	1.87
Frontier Commonwealth	145	1.66	138	1.73	83	1.13	121	1.78
Verizon North	69	0.64	82	0.72	81	0.78	70	0.78
Verizon PA	1,051	2.06	839	1.53	795	1.59	944	2.20
Windstream	162	2.07	85	1.12	94	1.26	110	1.40
Total	**1,595**		**1,192**		**1,104**		**1,421**	
Average of Rates		**1.58**		**1.11**		**1.05**		**1.61**

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

2018-21 Justified Residential Consumer Complaint Numbers/Rates
Major Local Telecommunications Utilities

Utility	2018		2019		2020		2021	
	Number**	Rate	Number**	Rate	Number**	Rate	Number**	Rate
CenturyLink	108	0.94	19	0.18	27	0.27	106	1.12
Frontier Commonwealth	97	1.11	93	1.16	41	0.56	64	0.94
Verizon North	39	0.36	51	0.45	50	0.48	40	0.44
Verizon PA	596*	1.17*	550*	1.00*	456*	0.91*	520*	1.21*
Windstream	111	1.42	48	0.63	42	0.56	48	0.61
Total	**951**		**761**		**616**		**778**	
Average of Rates		**1.00**		**0.69**		**0.56**		**0.87**

* Based on a probability sample of complaints.
** Estimated based on the number of complaints in CSIS: 2018 as of June 21, 2019; 2019 as of July 10, 2020; 2020 as of June 4, 2021; and 2021 as of Sept. 10, 2022.

- The justified Consumer Complaint rate is a normalized ratio useful for comparing utility performance among the various companies. It is not a percentage.

- The justified Consumer Complaint rate for Verizon North increased, while the rates decreased for the remaining major telecommunications utilities from 2018 to 2020. In 2021, the rates increased for

CenturyLink, Frontier Commonwealth, Verizon PA, and Windstream, while the rate decreased for Verizon North.

- Verizon PA had a 2020 justified Consumer Complaint rate that was higher than the industry average. In 2021, the rates for CenturyLink, Frontier Commonwealth, and Verizon PA were higher than the industry average.

- The following table presents the percent of justified Consumer Complaints for each major telecommunications utility in 2018, 2019, 2020, and 2021.

2018-21 Number/ Percent of Justified Residential Consumer Complaints Major Telecommunications Utilities

Utility	2018		2019		2020		2021	
	Number**	Percent	Number**	Percent	Number**	Percent	Number**	Percent
CenturyLink	108	64.3%	19	39.6%	27	52.9%	106	60.2%
Frontier Commonwealth	97	66.9%	93	67.4%	41	49.4%	64	52.9%
Verizon North	39	56.5%	51	62.2%	50	61.7%	40	57.1%
Verizon PA	596*	56.7%	550*	65.6%	456*	57.4%	520*	55.1%
Windstream	111	68.5%	48	56.5%	42	44.7%	48	43.6%
Total	**951**		**761**		**616**		**778**	
Average		**59.6%**		**63.8%**		**55.8%**		**54.8%**

* Based on a probability sample of complaints.
** Estimated based on the number of complaints in CSIS: 2018 as of June 21, 2019; 2019 as of July 10, 2020; 2020 as of June 4, 2021; and 2021 as of Sept. 10, 2022.

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

2018-21 Average Response Time to BCS Residential Consumer Complaints Major Local Telecommunications Utilities

Utility	Number of Days			
	2018	2019	2020	2021
CenturyLink	13.5	17.1	21.1	21.7
Frontier Commonwealth	11.4	12.9	10.3	13.0
Verizon North	15.8	14.0	13.8	13.3
Verizon PA	15.1	13.3	13.4	15.1
Windstream	17.0	16.1	12.6	15.4
Average	**14.9**	**13.6**	**13.5**	**16.7**

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

- Response time to PARs for the telecommunications utilities is calculated using all categories of PARs, including automatic customer transfers (also known as Warm Transfer).

- Frontier Commonwealth had the shortest Consumer Complaint response time in 2020, while CenturyLink took the most time to respond. In 2021, Frontier Commonwealth had the shortest response time, while CenturyLink took the most time to respond.

Payment Arrangement Requests (PARs)

Telecommunications service consists of three components: basic service, non-basic service and toll service. BCS does not handle requests for payment arrangements that involve toll or non-basic services because with respect to telecommunications payment arrangements, the PUC does not exert payment arrangement jurisdiction over competitive services. For the telecommunications industry, PARs are principally contacts to BCS or to utilities involving a request for payment terms for arrearages associated with basic service. Failure to enter into a payment arrangement or pay arrearages due for basic service may result in suspension, and subsequent termination, of basic service.[14] Suspension of basic telecommunications service involves the temporary cessation of service without the consent of the customer, while termination of basic service is the permanent cessation of service. The majority of PARs are from customers who contact BCS to request payment arrangements after they have received a suspension notice.

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

[14] Suspension or termination of basic local exchange service can also occur when a customer refuses to voluntarily transition their service from traditional copper to fiber during an ILEC's network transformation.

exists. Consequently, in this report, telecommunications complaints that involve PARs have been separated from telecommunications PARs that also involve a dispute. For the telecommunications industry, PARs that involve a dispute are classified as Consumer Complaints. During 2020, BCS handled 12 PARs from residential customers of the various telecommunications service providers. The five major telecommunications utilities represented 92% (11) of the totals PARs. During 2021, BCS handled 13 PARs from residential customers of the various telecommunications service providers. The five major telecommunications utilities represented 85% (11) of the totals PARs.

The 2018, 2019, 2020 and 2021 justified PAR rates and response times for the major telecommunications utilities are presented in the tables that follow.

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

The following tables show the PAR Rate, the Justified PAR Rate, and the Percent of Justified PARs. The PAR rate is the number of PARs for each 1,000 residential customers. The justified PAR rate is the estimated number of justified PARs for each 1,000 residential customers based on a statistically valid sampling of complaints. A complaint is considered “justified” if it is found that the utility did not comply with Commission Orders, policies, regulations, reports, Secretarial Letters, or tariffs. The percent of justified PARs is the number of justified complaints divided by the number of complaints evaluated (multiplied by 100). BCS evaluates a statistically valid sampling of complaints for each utility. The percent of justified PARs is the estimated number of justified complaints divided by the total number of complaints received (multiplied by 100). BCS evaluates a statistically valid sampling of complaints for each utility.

2020 and 2021 Residential Payment Arrangement Request (PAR) Rates, Justified PAR Rates, and Percent of Justified PARs
Major Local Telecommunications Utilities

Utility	PAR Rate	Justified PAR Rate	Percent of Justified PARs
2020			
CenturyLink	0.00	0.00	0.0%
Frontier Commonwealth	0.07	0.04	60.0%
Verizon North	0.00	0.00	0.0%
Verizon PA	0.01	0.01	100.0%
Windstream	0.04	0.00	0.0%
Average	**0.02**	**0.01**	**54.5%**
2021			
CenturyLink	0.02	0.00	0.0%
Frontier Commonwealth	0.01	0.00	0.0%
Verizon North	0.00	0.00	0.0%
Verizon PA	0.02	0.01	57.1%
Windstream	0.01	0.00	0.0%
Average	**0.01**	**0.00**	**36.4%**

- The PAR rate equals the number of PARs for each 1,000 residential customers.
- The justified PAR rate equals the estimated number of justified PARs for each 1,000 residential customers. The justified rate is a normalized ratio useful for comparing utility performance among the various companies.
- The percent of justified PARs is the estimated number of justified complaints divided by the total number of complaints received. (BCS evaluates a statistically valid sampling of complaints for each utility.)
- The following table presents the number of PARs and the PAR rate for each major telecommunications utilities in 2018, 2019, 2020 and 2021.

2018-21 Residential Payment Arrangement Request (PAR) Numbers/Rates
Major Local Telecommunications Utilities

Utility	2018		2019		2020		2021	
	Number	Rate	Number	Rate	Number	Rate	Number	Rate
CenturyLink	3	0.03	6	0.06	0	0.00	2	0.02
Frontier Commonwealth	3	0.03	2	0.03	5	0.07	1	0.01
Verizon North	2	0.02	1	0.01	0	0.00	0	0.00
Verizon PA	21	0.04	10	0.02	3	0.01	7	0.02
Windstream	3	0.04	0	0.00	3	0.04	1	0.01
Total	**32**		**19**		**11**		**11**	
Average of Rates		**0.03**		**0.02**		**0.02**		**0.01**

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

2018-21 Justified Residential Payment Arrangement Request (PAR) Numbers/Rates
Major Local Telecommunications Utilities

Utility	2018		2019		2020		2021	
	Number*	Rate	Number*	Rate	Number*	Rate	Number*	Rate
CenturyLink	0	0.00	0	0.00	0	0.00	0	0.00
Frontier Commonwealth	2	0.02	1	0.01	3	0.04	0	0.00
Verizon North	0	0.00	0	0.00	0	0.00	0	0.00
Verizon PA	1	0.00	2	0.00	3	0.01	4	0.01
Windstream	0	0.00	0	0.00	0	0.00	0	0.00
Total	**3**		**3**		**6**		**4**	
Average of Rates		**0.00**		**0.00**		**0.01**		**0.00**

* Estimated based on the number of complaints in CSIS: 2018 as of June 21, 2019; 2019 as of July 10, 2020; 2020 as of June 4, 2021; and 2021 as of Sept. 10, 2022.

- The justified PAR rate equals the estimated number of justified PARs for each 1,000 residential customers. It is not a percentage.

- The following table presents the percent of justified PARs for each major telecommunications utility in 2018, 2019, 2020 and 2021.

2018-21 Number/Percent of Justified Residential Payment Arrangement Requests (PARs) Major Local Telecommunications Utilities

Utility	2018		2019		2020		2021	
	Number*	Percent	Number*	Percent	Number*	Percent	Number*	Percent
CenturyLink	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Frontier Commonwealth	2	66.7%	1	50.0%	3	60.0%	0	0.0%
Verizon North	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Verizon PA	1	4.8%	2	20.0%	3	100.0%	4	57.1%
Windstream	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**3**		**3**		**6**		**4**	
Average		**9.4%**		**15.8%**		**54.5%**		**36.4%**

* Estimated based on the number of complaints in CSIS: 2018 as of June 21, 2019; 2019 as of July 10, 2020; 2020 as of June 4, 2021; and 2021 as of Sept. 10, 2022.

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

2018-21 Average Response Time to BCS Residential Payment Arrangement Requests (PARs) Major Local Telecommunications Utilities

Utility	Number of Days			
	2018	2019	2020	2021
CenturyLink	8.3	21.7	0.0	26.0
Frontier Commonwealth	7.7	19.0	12.4	13.0
Verizon North	7.5	1.0	0.0	0.0
Verizon PA	7.8	5.9	10.7	10.1
Windstream	15.0	0.0	3.5	8.0
Average	**8.5**	**12.0**	**10.1**	**13.1**

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

- The calculation for average response is calculated using all categories of PARs, including automatic customer transfers (also known as Warm Transfer).

- From 2018 to 2020, the average response time to PARs for Frontier Commonwealth and Verizon PA increased, while the average response time decreased for CenturyLink, Verizon North, and Windstream. In 2021, the average response time to PARs increased for CenturyLink, Frontier Commonwealth, and Windstream, while the average response time for Verizon PA decreased and Verizon North remained stable.

Termination of Service

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

Residential Service Terminations/Termination Rates
Major Local Telecommunications Utilities

Utility	Residential Service Terminations				Termination Rates			
	2018	2019	2020	2021	2018	2019	2020	2021
CenturyLink	7,188	5,736	636	326	62.72	53.36	6.28	3.45
Frontier Commonwealth	2,544	2,268	720	129	29.12	28.40	9.78	1.90
Verizon North	4,284	2,556	588	193	39.79	22.57	5.67	2.14
Verizon PA	15,852	14,232	3,288	1,128	31.07	25.87	6.59	2.63
Windstream	2,928	2,976	1,692	216	37.35	39.36	22.71	2.76
Total	**32,796**	**27,768**	**6,924**	**1,992**				
Average of Rates					**40.01**	**33.91**	**10.21**	**2.58**

- The termination rate equals the number of basic service terminations for each 1,000 residential customers.

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

Compliance

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

The infraction rates in the table that follows are based on informal complaints that residential complainants filed with BCS from 2018 through 2021. The Infraction Category tables present detailed information about the infractions identified in 2020 and 2021 complaints to the BCS.

Commission Infraction Rates
Major Local Telecommunications Utilities

Utility	2018	2019	2020	2021
CenturyLink	2.48	0.32	0.45	3.26
Frontier Commonwealth	4.42	5.84	1.58	4.06
Verizon North	1.26	1.87	1.36	1.37
Verizon PA	2.29	2.93	2.20	2.12
Windstream	5.64	2.51	0.95	2.00

- The infraction rate is the number of informally verified infractions per 1,000 residential customers. Dividing per 1,000 customers normalizes the data for comparison purposes. The infraction rate is not a percentage.
- The tables below show the actual number of infractions found for 2020 and 2021 by category.
- The category with customer trouble reports is consistently a high percentage infraction area.

Number of Major Local Telecommunications Utility Infractions*
2020

Category	CenturyLink	Frontier Commonwealth	Verizon North	Verizon PA	Windstream	Telecom-munications Total
Broadband	0	3	9	15	2	**29**
Network Modernization Plans	4	6	9	38	7	**64**
Complaint Procedures	10	14	22	199	18	**263**
Quality of Service	7	6	11	90	12	**126**
Service Records	1	54	23	241	9	**328**
Customer Trouble Reports	13	15	55	386	11	**480**
Installation of Service	0	1	0	4	0	**5**
Migration	0	0	0	0	4	**4**
Billing and Payment	3	4	0	7	1	**15**
Slamming and Cramming	0	0	5	0	0	**5**
Credit and Deposits	0	0	0	1	0	**1**
Suspension and Termination	0	1	0	5	1	**7**
Dispute Procedures	2	7	1	26	1	**37**
Other	6	5	6	84	5	**106**
Total	**46**	**116**	**141**	**1,096**	**71**	**1,470**

* The number of verified infractions identified by BCS as of Aug. 26, 2021.

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

Number of Major Local Telecommunications Utility Infractions*
2021

Category	CenturyLink	Frontier Commonwealth	Verizon North	Verizon PA	Windstream	Telecom-munications Total
Broadband	1	3	1	7	0	**12**
Network Modernization Plans	5	9	10	18	6	**48**
Complaint Procedures	44	28	24	135	25	**256**
Quality of Service	57	20	15	106	9	**207**
Service Records	62	145	33	210	46	**496**
Customer Trouble Reports	124	50	30	282	45	**531**
Installation of Service	0	0	0	3	1	**4**
Migration	0	0	0	2	1	**3**
Billing and Payment	0	0	1	25	3	**29**
Slamming and Cramming	0	0	0	0	0	**0**
Credit and Deposits	0	1	0	2	0	**3**
Suspension and Termination	0	0	0	3	1	**4**
Dispute Procedures	3	3	4	51	8	**69**
Other	12	17	6	65	12	**112**
Total	**308**	**276**	**124**	**909**	**157**	**1,774**

* The number of verified infractions identified by BCS as of May 2, 2022.

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

Percent of Major Local Telecommunications Utility Infractions*
2020

Category	CenturyLink	Frontier Commonwealth	Verizon North	Verizon PA	Windstream	Telecom-munications Average
Broadband	0%	3%	6%	1%	3%	**3%**
Network Modernization Plans	9%	5%	6%	3%	10%	**7%**
Complaint Procedures	22%	12%	16%	18%	25%	**19%**
Quality of Service	15%	5%	8%	8%	17%	**11%**
Service Records	2%	47%	16%	22%	13%	**20%**
Customer Trouble Reports	28%	13%	39%	35%	15%	**26%**
Installation of Service	0%	1%	0%	0%	0%	**0%**
Migration	0%	0%	0%	0%	6%	**1%**
Billing and Payment	7%	3%	0%	1%	1%	**2%**
Slamming and Cramming	0%	0%	4%	0%	0%	**1%**
Credit and Deposits	0%	0%	0%	0%	0%	**0%**
Suspension and Termination	0%	1%	0%	0%	1%	**0%**
Dispute Procedures	4%	6%	1%	2%	1%	**3%**
Other	13%	4%	4%	8%	7%	**7%**

* The number of verified infractions identified by BCS as of Aug. 26, 2021.

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

Percent of Major Local Telecommunications Utility Infractions*
2021

Category	CenturyLink	Frontier Commonwealth	Verizon North	Verizon PA	Windstream	Telecom-munications Average
Broadband	0%	1%	1%	1%	0%	**1%**
Network Modernization Plans	2%	3%	8%	2%	4%	**4%**
Complaint Procedures	14%	10%	19%	15%	16%	**15%**
Quality of Service	19%	7%	12%	12%	6%	**11%**
Service Records	20%	53%	27%	23%	29%	**30%**
Customer Trouble Reports	40%	18%	24%	31%	29%	**28%**
Installation of Service	0%	0%	0%	0%	1%	**0%**
Migration	0%	0%	0%	0%	1%	**0%**
Billing and Payment	0%	0%	1%	3%	2%	**1%**
Slamming and Cramming	0%	0%	0%	0%	0%	**0%**
Credit and Deposits	0%	0%	0%	0%	0%	**0%**
Suspension and Termination	0%	0%	0%	0%	1%	**0%**
Dispute Procedures	1%	1%	3%	6%	5%	**3%**
Other	4%	6%	5%	7%	8%	**6%**

* The number of verified infractions identified by BCS as of May 2, 2022.

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

Universal Service Programs

As part of its ongoing responsibilities, BCS monitors the universal service programs of local telecommunications companies and wireless companies. For the telecommunications industry, universal service programs[15] include Lifeline Service (Lifeline),[16] Lifeline 100 Service (Lifeline 100)[17] through Verizon PA and Verizon North and the Verizon PA Universal Telephone Assistance Program (UTAP). These programs ensure that low-income consumers have access to telecommunications service by providing discounts or credits for telecommunications service. The Commission approved the implementation of Pennsylvania's first

[15] With the exception of UTAP, these programs are supported fully or in part by federal universal service funds.
[16] Lifeline f/k/a/ Lifeline 135 in previous UCARE reports.
[17] Lifeline 100 f/k/a Lifeline in previous UCARE reports.

universal service program for local telecommunications companies in 1989.[18] In December 1997, the Commission approved Lifeline service plans for 44 incumbent telecommunications utilities which led to the statewide implementation of telecommunications utilities' Lifeline programs in 1998.

Lifeline

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

In August 2010, the Commission adopted the final Policy Statement on the Commonwealth of Pennsylvania Guidelines for Designation and Annual Recertification as an ETC for purposes of Federal Universal Service Support (ETC Guidelines).[22] Designation as an ETC for provision of Lifeline service permits the wireline and wireless providers to participate in the federal Universal Service Fund's (USF) Lifeline program in order to receive low-income support from the federal USF.[23]

On Mar. 2, 2012, the FCC issued a Final Rule[24] which reformed and began to modernize the federal USF Lifeline program. The reforms were intended to accomplish the following: (1) strengthen protections against waste, fraud and abuse; (2) improve program administration and accountability; (3) improve enrollment and consumer disclosures; (4) initiate modernization of the program for broadband; and (5) constrain the growth of the program to reduce the burden of all who contribute to the federal USF. In addition, the FCC identified numerous unserved census block groups in Pennsylvania where wireless ETCs were encouraged to bid to receive Mobility Fund Phase 1 support to build infrastructure over which to deliver 3G or better broadband and voice service. In October 2012, T-Mobile Northeast, LLC and NEP Cellcorp, Inc. won the bids to build the infrastructure in designated areas of Pennsylvania.

The Commission's Nov. 9, 2016, Order at Docket No. M-2016-2566383 adopted the eligibility criteria from the FCC's Lifeline and Link Up Reform and Modernization, Third Report and Order (2016 Order), WC Docket No. 11-42 released Apr. 27, 2016. Effective Dec. 2, 2016, eligibility for Lifeline support was streamlined to include the following programs: Supplemental Nutrition Assistance Program (SNAP), Medicaid, Supplemental Security Insurance (SSI), Federal Public Housing Assistance and Veterans Pension Benefits. The

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[18] The Link-Up America Program was the first universal service program. The FCC eliminated this program in 2012.

[19] 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.

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

[21] 66 Pa. C.S. §§ 3019 (f)(1-4).

[22] Docket No. M-2010-2164741, July 29, 2010, which codifies the guidelines at 52 Pa. Code § 69.2501.

[23] 47 U.S.C. §§ 214(e)(3-4) In a community where no telecommunications utility provides services supported by federal universal support mechanisms, the FCC (for interstate) and PUC (for intrastate) will determine which telecommunications utility is best able to provide such service. Any telecommunications utility ordered to provide such service will be designated as an ETC for that community and become eligible to receive universal service support. This is the carrier of last resort (COLR) obligation.

[24] 47 C.F.R. Part 54 – Universal Service

income-based eligibility (135% of Federal Poverty Guidelines) did not change. The Commission's order required ETCs designated by the Commission to adhere to all federal ETC rules, regulations and standards including: (1) broadband as a supported service; (2) minimum service standards for broadband; (3) mobile voice and mobile broadband access services;[25] (4) the establishment of a National Verifier; and (5) port freeze rules.[26]

On Dec. 1, 2017, the FCC released the Lifeline and Link Up Reform and Modernization Fourth Report and Order. In that order, the FCC determined that the disadvantages to consumers of the 2016 port freeze rules outweighed the benefits. As such effective Mar. 19, 2018, the FCC eliminated the port freeze rules. The order also clarified that Wi-Fi is not a substitute for fixed broadband or mobile broadband delivered on a 3G or better network and is not eligible for Lifeline reimbursement.

Currently Lifeline is offered by ILECs, CLECs, and some wireless carriers. As of Dec. 31, 2020, there were 333,835 low-income Pennsylvania consumers enrolled in Lifeline. Wireless carriers provided Lifeline service to 322,867 of those consumers. As of Dec. 31, 2021, there were 229,610 low-income Pennsylvania consumers enrolled in Lifeline. ETCs provide Lifeline service to 219,973 of those consumers. The vast majority of Lifeline participants (219,694) in Pennsylvania chose a wireless ETC to provide their service. The following table shows enrollment activity for the major telecommunications utilities' Lifeline programs in 2018, 2019, 2020 and 2021. Information regarding total Lifeline enrollment can be found in the Lifeline Tracking Report.

2018-21 Lifeline Service Activity

Utility	Total Number of Customers Who Received Lifeline Service				Total Number of Customers Enrolled as of December			
	2018	2019	2020	2021	2018	2019	2020	2021
CenturyLink	1,114	760	685	502	682	607	474	412
Frontier Commonwealth	1,002	848	780	602	762	733	565	528
Verizon North*	1,805	1,903	1,518	1,374	1,211	1,042	925	800
Verizon PA*	13,864	10,190	8,484	7,542	9,134	7,828	6,965	6,017
Windstream	1,571	1,220	1,053	1,204	1,018	906	923	941
Total	**19,356**	**14,921**	**12,520**	**11,224**	**12,807**	**11,116**	**9,852**	**8,698**

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

As of Dec. 1, 2020, and Dec. 1, 2021, the monthly Lifeline credit for stand-alone voice service is $5.25, or $9.25 for bundled service that meets the minimum standards for broadband. The monthly discount for the Verizon companies' Lifeline 100 is $7.75.

As of Dec. 1, 2020, and Dec. 1, 2021, the minimum broadband standard for Lifeline subscribers who receive service through an ILEC is 25 Mbps download and 3 Mbps upload, with a minimum of 1,024 GB of

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

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

usage each month. The minimum monthly usage in 2021 was 1,229 GB. If the ILEC is unable to meet minimum speed standard, the ILEC must provide the highest performing broadband service available with at least 4 Mbps download and 1 Mbps upload. For Lifeline subscribers who receive service through wireless ETCs, the minimum standard is 4.5 GB per month of 3G or better mobile data.

Universal Telephone Assistance Program

Verizon PA implemented UTAP along with its Lifeline service program as part of a settlement agreement that was approved by the Commission Aug. 4, 1995 (P-00930715, P-00950958). Verizon PA is the only utility that offers a financial assistance program that helps existing Lifeline 100 customers and qualified Lifeline 100 applicants (with a pre-existing basic service arrearage) to restore their basic telecommunications service. The Dollar Energy Fund manages UTAP and distributes funds to qualified customers and Lifeline applicants. The following table shows the number of customers enrolled in the Verizon PA Lifeline 100 program and the UTAP grants provided in 2018, 2019, 2020 and 2021.

2018-21 Verizon PA Lifeline 100 and UTAP Summary

	2018	2019	2020	2021
Total Number of Customers Enrolled as of December	3,560	3,435	2,814	2,446
Number of Customers Given Assistance	8	13	4	0
Total Amount of Funds Distributed	$451	$994	$247	$0
Average Grant Amount	$56.38	$76.46	$61.75	$0

Automatic Notification Program

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

Wireless ETC Designation

In its 2005 First Universal Service Report and Order, the FCC established minimum requirements for telecommunications carriers to be designated as ETCs and encouraged states that exercise jurisdiction over ETC designation to adopt the same requirements.[27] This order applied to both wireline and wireless carriers.

On Apr. 11, 2008, the FCC conditionally designated TracFone Wireless, Inc. (TracFone) as the first wireless ETC in PA. The FCC's designation allowed TracFone to provide Lifeline service and receive

[27] See Matter of Federal-State Joint Board of Universal Service, First Report and Order, CC Docket No. 96-45, 20 FCC Rcd 6371 (released Mar. 17, 2005).

reimbursement for Lifeline from the Federal USF but did not make the utility eligible for USF high-cost support.[28] At the time of the FCC designation, Pennsylvania had not yet exerted jurisdiction over wireless providers for the purpose of ETC designation.

On Aug. 2, 2010, the PUC entered its Final Policy Statement Order, at Docket No. M-2010-2164741. This order adopted the FCC minimum requirements for ETC designation but also established additional state specific requirements.[29] On Dec. 22, 2010, Virgin Mobile USA, LP became the first wireless ETC designated by the PA PUC.

Non-Traditional ETC Designation

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

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

To be eligible to receive support from both Auction 903 and Auction 904, each of the winning bidders must be designated as an ETC in Pennsylvania. The following table shows the ETCs approved to operate in PA as of Dec. 30, 2020.

[28] See TracFone ETC Designation Order, CC Docket No. 96-45, Order, 23 FCC Rcd 6206 (released Apr. 11, 2008).
[29] See 66 Pa. C.S. § 3019(f).

2020-2021 PA Wireless and Non-Traditional ETCs

Utility	PUC Docket #	Date of ETC Designation
Airvoice Wireless d/b/a Feel Safe Wireless	P-2013-2379431	7/9/2014
American Broadband d/b/a American Assistance	P-2013-2362571	11/5/2015
AmeriMex d/b/a Safety Net Wireless	P-2013-2369557	3/6/2014
Boomerang Wireless d/b/a enTouch Wireless	P-2014-2421056	9/1/2016
Buffalo-Lake Erie d/b/a Blue Wireless**	P-2013-2382739	11/13/2014
Centre WISP	P-2021-3024219	8/15/2021
Claverack Communications d/b/a Claverack Rural Electric Coop	P-2021-3023996	7/15/2021
Global Connection Inc. d/b/a Stand Up Wireless	P-2011-2245213	9/13/2012
iWireless d/b/a Access Wireless	P-2011-2235119	9/3/2015
Limitless Mobile	P-2012-2287339	5/24/2012
Q-Link	P-2011-2275830	4/18/2013
Sage Telecom d/b/a TruConnect	P-2013-2398807	1/15/2015
Tag Mobile	P-2011-2241542	12/5/2012
Telrite Corp d/b/a Life Wireless	P-2011-2398807	9/26/2013
T-Mobile d/b/a InReach Wireless	P-2011-2275748	5/24/2012
Time Warner Cable d/b/a Charter (cable) Spectrum (voice)	P-2021-3023594	7/15/2021
Tracfone d/b/a Safelink*	n/a	n/a
Tri-County Electric Cooperative d/b/a Tri-County Connections	P-2018-3005127	4/27/2019
Velocity.Net Communications	P-2018-3006180	1/16/2020
Viasat Carrier Services	P-2018-3004983	4/30/2020
Virgin Mobile d/b/a Assurance Wireless	P-2010-2155915	12/22/2010
Youngsville TV d/b/a Blue Fiber	P-2021-3023604	8/26/2021
YourTel America d/b/a TerraCom	P-2011-2226044	10/14/2011
Zito West d/b/a Zito Mifflin County	P-2021-3023622	9/15/2021

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

** Buffalo-Lake Erie abandoned their ETC designation as of 9/17/2020.

National Lifeline Verifier

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

On Dec. 4, 2018, the National Verifier launched in Pennsylvania. Initially, ETCs were not required to use the verifier; however, 23 Pennsylvania ETCs successfully used the verifier to obtain an eligibility decision during the first month. As of Mar. 5, 2019, applicants must receive an approved eligibility decision from the National Verifier to enroll in Lifeline. To receive an eligibility decision, applicants have the option of applying for Lifeline through the ETC of their choice, submitting the Universal Lifeline Application and Household Worksheet by mail or by applying through the consumer portal at checklifeline.org.

Chapter 30 Broadband

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

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

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

The Pennsylvania Broadband Bill of Rights directed consumers to contact BCS if their local phone company could not provide broadband or the service provided did not meet Pennsylvania requirements.

Many of the telecommunications complaints that BCS receives, also include issues with broadband speed and/or availability. In 2017, BCS began tracking complaints that contain a broadband component. The following table shows the total number of residential telecommunications informal complaints in 2018, 2019, 2020, and 2021 for each of the five major telecommunications utilities, compared to the number of complaints that included a dispute regarding broadband speed, access or availability.

2018-21 Chapter 30 Broadband Complaints
Residential Informal Complaints (Consumer Complaints and PARs)
Major Local Telecommunications Utilities

Utility	Total Number of Complaints				Total Number of Complaints with a Broadband Component				% of Complaints with a Broadband Component			
	2018	2019	2020	2021	2018	2019	2020	2021	2018	2019	2020	2021
CenturyLink	171	54	51	178	60	23	17	55	35%	43%	33%	31%
Frontier Commonwealth	148	140	88	122	88	80	31	54	59%	57%	35%	44%
Verizon North	71	83	81	70	29	26	29	26	41%	31%	36%	37%
Verizon PA	1,072	849	798	951	283	266	208	217	26%	31%	26%	23%
Windstream	165	85	97	111	49	36	42	35	30%	42%	43%	32%
Total	**1,627**	**1,211**	**1,115**	**1,432**	**509**	**431**	**327**	**387**	**31%**	**36%**	**29%**	**27%**

- Overall, in 2020, 29% of the residential informal complaints for the major telecommunications utilities included a dispute regarding broadband speed, access, or availability, compared to 31% in 2018. In 2021, it dropped to 27%.

Glossary of Terms

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

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

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

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

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

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

Customer Assistance Programs (CAPs) – Payment assistance and debt forgiveness programs for low-income households. CAPs are intended to provide more affordable monthly bills based on a set energy burden standard. CAP billing credits may be applied to ongoing usage as long as the household remains current and timely in paying its monthly CAP payments. CAP charges may take the form of a discounted price on actual usage on either all or a portion of the usage,[30] a percentage of the monthly bill,[31] or a monthly amount that is calculated upon a percentage of the household income.[32] Percentage of income plans are correlated directly to the household's income and the utility's energy burden targets. CAP's debt forgiveness feature freezes a household's unpaid past debt upon entry into the program. As long as the household remains current and timely on their future CAP payments, the past debt is not collected and is forgiven in incremental amounts over time.

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

CURE (Customer & Utility Resolution Effort) Complaint – A voluntary program designed to better manage workload, improve customer satisfaction, and reduce costs. The utility contacts the complainant and attempts to achieve a resolution. If mutual satisfaction is reached, the utility and complainant notify BCS the informal complaint can be closed without further investigation, and the utility isn't required to submit a full utility report.

Electric Distribution Company (EDC) – The owner of the power lines and equipment necessary to deliver purchased electricity to the customer.

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[30] Also referred to as "rate discount bill."
[31] Also referred to as "percent of bill."
[32] Also referred to as a "percent of income payment" (PIP).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Problem Categories – A breakdown of residential Consumer Complaints by specific problem categories such as billing, credit and deposits, service quality, rates, etc.

Response Time in Days – 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 Consumer Complaints and PARs.

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

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

List of Acronyms

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

Appendices

Appendix A

2018-21 Number of Residential Customers
Major Electric Distribution Companies

Utility	2018	2019	2020	2021
Duquesne	535,487	538,534	541,210	543,300
Met-Ed	502,110	504,685	508,753	512,216
PECO+	1,492,306	1,505,328	1,518,942	1,530,346
Penelec	501,456	500,877	501,635	501,816
Penn Power	145,285	146,018	147,020	148,138
PPL	1,227,683	1,233,837	1,243,501	1,251,196
UGI-Electric	55,225	55,131	54,969	55,084
West Penn	626,454	627,499	630,039	632,415
Total	**5,086,006**	**5,111,909**	**5,146,069**	**5,174,511**

+ PECO statistics include electric and gas.

2018-21 Number of Residential Customers
Major Natural Gas Distribution Companies

Utility	2018	2019	2020	2021
Columbia	396,835	400,044	405,653	407,892
NFG	197,108	196,778	197,945	198,007
Peoples*	334,790	335,583	591,996	593,089
Peoples-Equitable*	248,408	247,801	n/a	n/a
PGW	477,533	480,347	486,934	488,817
UGI-Gas**	361,789	367,175	604,375	611,631
UGI North**	156,555	157,025	n/a	n/a
Total	**2,173,018**	**2,184,753**	**2,286,903**	**2,299,436**

* Due to the Peoples Natural Gas merger, effective Jan. 1, 2020, the Peoples data includes Peoples-Equitable.
** Due to the UGI Gas merger, effective Jan. 1, 2020, the UGI Gas data includes UGI Central and UGI North.

Appendix A (Continued)

2018-21 Number of Residential Customers
Major Water Companies

Utility	2018	2019	2020	2021
Aqua	401,219	404,017	406,313	632,758
PAWC	608,928	613,434	628,402	409,411
Large Class A Total	**1,010,147**	**1,017,451**	**1,034,715**	**1,042,169**
Audubon	2,728	2,712	2,631	2,687
Columbia	9,663	9,733	9,778	9,838
Community Utilities[4]	2,624	2,632	2,640	2,647
Newtown Artesian	9,373	9,625	9,639	9,649
Veolia Bethel	2,432	2,462	2,439	2,450
Veolia PA	54,936	56,266	57,138	58,175
York	61,603	62,128	62,697	63,323
"Other Class A" Total	**143,359**	**145,558**	**146,962**	**148,769**
All Class A Total	**1,153,506**	**1,163,009**	**1,181,677**	**1,190,938**

2018-21 Number of Residential Customers
Municipal Water and Sewer Utilities

Utility	2018	2019	2020	2021
PWSA	95,565	97,726	97,834	97,915

2018-21 Number of Residential Customers
Major Telecommunications Companies

Utility	2018	2019	2020	2021
CenturyLink	114,601	107,497	101,327	94,357
Frontier Commonwealth	87,348	79,861	73,598	68,032
Verizon North	107,673	113,253	103,753	90,239
Verizon PA	510,221	550,138	498,595	428,220
Windstream	78,396	75,613	74,511	78,396
Total	**898,239**	**926,362**	**851,784**	**759,244**

Appendix B-1

Categories of Infractions
Electric, Gas and Water

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

Meter Reading - 56.12(1)-(6)

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

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

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

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

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

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

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

Landlord/Ratepayer - 1521-1533

Dispute Handling - 56.2-Definition of Dispute, 56.2-Definition of Initial Inquiry, 56.141-152, 56.181, and 65.3(a)

Other - 54.73, 56.1, 56.71, 56.202, 59.34, 59.36, 62.4, 65.8, 1417, 1501, Tariff, and Moratorium Order M-2020-3019244

Appendix B-2

Categories of Infractions
Telecommunications

Broadband - 3012-Definition of Broadband

Network Modernization Plans - 3014

Complaint Procedures - 63.1, 63.15, and 63.59

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

Service Records - 63.22

Customer Trouble Reports - 63.24, 63.57, and 64.52

Installation of Service - 63.58

Migration - 63.201-221

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

Slamming and Cramming - 64.23

Credit and Deposits - 64.32-34 and 64.36

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

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

Other - 63.65(4), 64.192(3), 501(c), 1501, and Moratorium Order M-2020-3019244

Appendix C

2020 and 2021 Residential Informal Complaints (Consumer Complaints and PARs) for Non-Major Utilities Not Included in Industry Chapters

Utility*	Number of Complaints		Total Number of Complaints Includes Secondary Utility Complaints **	
ELECTRIC	2020	2021	2020	2021
Pike County Light and Power (EDC)	5	0	5	0
Other Electric distribution companies (EDCs)***	1	3	1	3
4 Choice Energy (EGS)	38	35	42	36
AEP Energy (EGS)	7	10	10	13
All American Power & Gas (EGS)	42	0	46	0
Alpha Gas & Electric (EGS)	8	0	9	0
Ambit Energy (EGS)	26	42	31	43
American Power & Gas of PA (EGS)	14	12	17	12
AP Gas and Electric (EGS)	13	34	13	36
Better Buy Energy (EGS)	7	13	8	15
Cirro Energy (EGS)	8	8	9	11
Clean Choice Energy f/k/a Ethical Energy (EGS)	21	15	22	18
Cleansky Energy f/k/a Titan Gas & Power (EGS)	69	78	83	82
Clearview Electric (EGS)	11	8	11	10
Constellation Energy Power Choice (EGS)	0	0	9	5
Discount Power (EGS)	30	13	35	15
Elec-Direct Energy Services (EGS)	31	10	39	12
Eligo Energy PA (EGS)	24	46	31	49
Energy Harbor f/k/a First Energy Solutions (EGS)	25	60	29	64
Energy Plus Holdings (EGS)	8	7	8	7
Frontier Utilities Northeast (EGS)	8	35	9	39
Great American Power (EGS)	65	10	71	11
Green Mountain Energy (EGS)	25	16	26	17

*Only those non-major utilities having five or more complaints in 2020 are listed individually. Non-major utilities having less than five residential complaints in 2020 are included in the appropriate general category for their industry, i.e. “Other Electric distribution companies” or “Other CLECs,” etc.

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

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

Appendix C (Continued)

2020 and 2021 Residential Informal Complaints (Consumer Complaints and PARs) for Non-Major Utilities Not Included in Industry Chapters

Utility*	Number of Complaints		Total Number of Complaints Includes Secondary Utility Complaints **	
ELECTRIC (continued)	2020	2021	2020	2021
Greenlight Energy (EGS)	17	0	19	5
IDT Energy (EGS)	11	0	12	0
Indra Energy (EGS)	79	36	93	39
Inspire Energy Holdings (EGS)	34	42	37	44
Interstate Gas Supply (EGS)	12	16	13	17
Josco Energy USA (EGS)	8	0	8	0
Just Energy PA (EGS)	13	11	13	11
Liberty Power (EGS)	11	6	15	6
Major Energy Services (EGS)	0	12	0	12
Mpower Energy NJ (EGS)	0	0	5	0
National Gas and Electric (EGS)	0	7	0	8
New Energy Ventured - Mid Atlantic (EGS)	9	8	12	12
Nextera Energy Service PA (EGS)	12	28	13	30
Nordic Energy Services (EGS)	7	12	10	12
North American Power and Gas (EGS)	12	6	14	6
NRG Home (EGS)	72	71	82	72
Ntherm (EGS)	0	19	5	19
Park Power (EGS)	23	23	27	27
Pennsylvania Gas and Electric (EGS)	41	11	46	12
Powervine Energy (EGS)	0	10	0	10
Pure Energy USA (EGS)	33	32	36	33
Residents Energy (EGS)	16	11	18	13
Respond Power (EGS)	14	0	14	0

*Only those non-major utilities having five or more complaints in 2020 are listed individually. Non-major utilities having less than five residential complaints in 2020 are included in the appropriate general category for their industry, i.e. “Other Electric distribution companies” or “Other CLECs,” etc.

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

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

Appendix C (Continued)

2020 and 2021 Residential Informal Complaints (Consumer Complaints and PARs) for Non-Major Utilities Not Included in Industry Chapters

Utility*	Number of Complaints		Total Number of Complaints Includes Secondary Utility Complaints **	
ELECTRIC (continued)	2020	2021	2020	2021
RPA Energy (EGS)	25	5	27	5
Rushmore Energy (EGS)	0	10	0	11
SFE Energy (EGS)	49	30	59	33
Shipley Oil (EGS)	6	6	7	6
Smartenergy.com (EGS)	33	47	41	49
South Bay Energy (EGS)	7	0	8	6
Spring Power & Gas (EGS)	7	0	8	0
Statewise Energy (EGS)	22	7	22	8
Stream Energy (EGS)	17	21	21	22
Sunrise Power and Gas (EGS)	0	9	5	9
Think Energy / Engie Retail (EGS)	10	7	12	7
Tomorrow Energy (EGS)	30	26	33	30
Town Square Energy East (EGS)	0	7	0	7
TriEagle Energy (EGS)	11	6	14	6
Verde Energy USA (EGS)	94	40	100	41
Vista Energy Marketing (EGS)	8	0	8	0
WGL Energy Services f/k/a WGES (EGS)	0	7	5	7
Xoom Energy PA (EGS)	7	0	8	0
Other Electric Generation Suppliers (EGSs)***	53	53	57	49
Total Non-Major Electric	**1,289**	**1,097**	**1,491**	**1,182**

*Only those non-major utilities having five or more complaints in 2020 are listed individually. Non-major utilities having less than five residential complaints in 2020 are included in the appropriate general category for their industry, i.e. "Other Electric distribution companies" or "Other CLECs," etc.

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

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

Appendix C (Continued)

2020 and 2021 Residential Informal Complaints (Consumer Complaints and PARs) for Non-Major Utilities Not Included in Industry Chapters

Utility*	Number of Complaints		Total Number of Complaints Includes Secondary Utility Complaints **	
Gas	**2020**	**2021**	**2020**	**2021**
Peoples Gas Co. f/k/a Peoples TWP (NGDC)	33	81	33	83
Other Natural Gas Distribution Companies (NGDCs)***	4	5	4	5
Cleansky Energy f/k/a Titan Gas & Power (NGS)	9	5	10	5
Dominion Energy Solutions (NGS)	29	51	32	55
Indra Energy (NGS)	35	32	36	33
Josco Energy USA (NGS)	5	0	5	0
Novec Energy Solutions (NGS)	8	0	8	0
NRG Home (NGS)	9	15	12	15
Pennsylvania Energy	5	12	5	14
Pennsylvania Gas and Electric (NGS)	18	14	19	15
SFE Energy (NGS)	9	15	12	15
Statewise Energy (NGS)	6	0	6	0
Tomorrow Energy (NGS)	8	7	10	7
Verde Energy USA Pennsylvania (NGS)	24	0	24	0
Vista Energy Marketing (NGS)	5	0	5	0
Other Natural Gas Suppliers (NGSs)***	38	51	46	55
Total Non-Major Gas	**245**	**288**	**267**	**302**

*Only those non-major utilities having five or more complaints in 2020 are listed individually. Non-major utilities having less than five residential complaints in 2020 are included in the appropriate general category for their industry, i.e. "Other Electric distribution companies" or "Other CLECs," etc.

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

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

Appendix C (Continued)

2020 and 2021 Residential Informal Complaints (Consumer Complaints and PARs) for Non-Major Utilities Not Included in Industry Chapters

Utility*	Number of Complaints	
WATER	**2020**	**2021**
Conneaut Lake Park (WP)	0	8
Reynolds Water (WP)	6	7
Other Private Water***	18	8
City of Lancaster (WM)	5	0
Other Municipal Water***	12	14
Total Non-Major Water	**41**	**37**
TELECOMMUNICATIONS	**2020**	**2021**
Armstrong Telephone (ILEC)	9	5
Consolidated Communications f/k/a North Pgh (ILEC)	5	7
TDS Telecom (Mahanoy & Mahantango) (ILEC)	6	0
Other Incumbent Local Exchange Carriers (ILECs)***	8	7
AT&T Local (CLEC)	5	10
Atlantic Broadband (CLEC)	13	16
Frontier Communications CTSI (CLEC)	8	11
Lingo Communications f/k/a Birch Residential (CLEC)	0	6
RCN Telecom of PA (CLEC)	0	7
Windstream Communications (CLEC)	15	9
Zito Media Voice (CLEC)	5	17
Other Competitive Local Exchange Carriers (CLECs)***	17	9
Assurance Wireless (Virgin Mobile) (ETC)	6	7
Qlink Wireless (ETC)	6	9
Safelink Wireless (Tracfone) (ETC)	15	5

*Only those non-major utilities having five or more complaints in 2020 are listed individually. Non-major utilities having less than five residential complaints in 2020 are included in the appropriate general category for their industry, i.e. “Other Electric distribution companies” or “Other CLECs,” etc.

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

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

Appendix C (Continued)

2020 and 2021 Residential Informal Complaints (Consumer Complaints and PARs) for Non-Major Utilities Not Included in Industry Chapters

Utility*	Number of Complaints	
TELECOMMUNICATIONS (continued)	**2020**	**2021**
T-mobile (Inreach) (ETC)	8	0
Comcast Digital Phone (VOIP)	0	17
Other Providers of Telecommunications Services***	9	5
Total Non-Major Telecommunications	**135**	**147**

2020 and 2021 Residential Informal Complaints (Consumer Complaints and PARs) for Non-Major Utilities Not Included in Industry Chapters

Utilities with Less Than Five Residential Complaints
ELECTRIC
2020
Other EDCs: Wellsboro Electric
Other EGSs: Agway Energy Services, Arcadia Power, Astral Energy, Atlantic Energy, Brighten Energy, Central Energy – North East, Champion Energy Services, Dynegy Energy Services, Energy Co-op, Energy Rewards/Comcast/Everyday Energy, Engie Resources, Entrust Energy, Hiko Energy, Integrity Energy, Marathon Power, National Gas and Electric, New Wave Energy, Oasis Energy, Planet Energy PA, Plymouth Rock Energy, Power Choice – Pepco, Power Direct, Rushmore Energy, Santanna Energy Services, Southeast Energy Consultants, Spark Energy, Star Energy Partners, Starion Energy of PA, Town Square Energy East and Viridian Energy PA
2021
Other EDCs: Pike County Light and Power and Wellsboro Electric
Other EGSs: Agway Energy Services, All American Power and Gas, Alpha Gas and Electric, Arcadia Power, Astral Energy, Atlantic Energy, Brighten Energy, Choose Energy, Dynegy Energy Services, Energy Rewards/Comcast/Everyday Energy, Entrust Energy, First Point Power, Freepoint Energy Solutions, Hudson Energy Services, IDT Energy, Integrity Energy, Mpower Energy NJ, New Wave Energy, Planet Energy PA, Plymouth Rock Energy, Power Management Co., Public Power, Respond Power, Santanna Energy Services, Spark Energy, Starion Energy of PA, Xoom Energy PA and Yep Energy

Appendix C (Continued)

2020 and 2021 Residential Informal Complaints (Consumer Complaints and PARs) for Non-Major Utilities Not Included in Industry Chapters

Utilities with Less Than Five Residential Complaints
GAS
2020
Other NGDCs: Herman Oil and Gas, Northeast Heat and Light, and Pine-Roe Gas
Other NGSs: Agway Energy Services, Alpha Gas and Electric, Ambit Northeast, American Power and Gas of PA, Direct Energy Services, Discount Power, Frontier Utilities Northeast, Gateway Energy Services, Greenlight Energy, IDT Energy, IGS Energy (Interstate Gas Supply), Mpower Energy NJ, National Gas and Electric, New Wave Energy, North American Power and Gas, Park Power, Plymouth Rock Energy, Residents Energy, Shipley Energy (Shipley Oil Service), Snyder Brothers, Spring Power and Gas, Star Energy Partners, Stream Energy, UGI Energy Services – Energylink and WGL Energy Services f/k/a WGES
2021
Other NGDCs: Herman Oil and Gas, Northeast Heat and Light, and Pine-Roe Gas
Other NGSs: Alpha Gas and Electric, Ambit Northeast, American Power and Gas of PA, Atlantic Energy, Clearview Electric, Constellation Energy Gas Choice, Direct Energy Services, Energy Harbor, Energy Rewards/Everyday Energy, Frontier Utilities Northeast, Greenlight Energy, IDT Energy, IGS Energy (Interstate Gas Supply), Major Energy, Mpower Energy NJ, Nordic Energy Services, Novec Energy Solutions, Ntherm, Plymouth Rock Energy, RPA Energy, Santanna Energy Services, Shipley Energy (Shipley Oil Service), Snyder Brothers, Statewise Energy, Stream Energy, UGI Energy Services – Energylink, Verde Energy USA PA, Vista Energy Marketing, WGL Energy Services f/k/a WGES, Xoom Energy PA and Yep Energy
WATER
2020
Other Private Water: Appalachian Utilities, Hidden Valley Utility Services, Imperial Point Water Services, Ken-Man Water, Overbrook Water, Pocono Water, Rock Springs Water, Twin Lakes Water, and Waterflow-Pike
Other Municipal Water: Borough of Duncansville, City of Altoona, City of Bethlehem, City of Lebanon, City of Lock Haven Water Department, City of Philadelphia and Hanover Water Works
2021
Other Private Water: Appalachian Utilities, Hidden Valley Utility Services, Pocono Water, Rock Springs Water, and Springhouse Waterworks f/k/a Imperial Point
Other Municipal Water: City of Bethlehem, City of Erie, City of Lancaster, City of Lock Haven Water Department, City of Philadelphia and Hanover Water Works

Appendix C (Continued)

2020 and 2021 Residential Informal Complaints (Consumer Complaints and PARs) for Non-Major Utilities Not Included in Industry Chapters

Utilities with Less Than Five Residential Complaints
TELECOMMUNICATIONS
2020
Other ILECs: Laurel Highland Telephone, North Penn Telephone, Pennsylvania Telephone and TDS Telecom
Other CLECs: Clear Rate Communications, Full Service Network, IDT America, Lingo Communications f/k/a Birch Residential, Metropolitan Telecommunications, RCN Telecom of PA, Service Electric Telephone and Talk America Services
Other Providers of Telecommunications Services: Access Wireless (I-Wireless), Comcast Digital Phone, MCI Local, MCI/Verizon Business, Standup Wireless (Global Connections) and Truconnect Wireless
2021
Other ILECs: Citizens Telephone Co. of Kecksburg, Laurel Highland Telephone, North Penn Telephone, Pennsylvania Telephone and TDS Telecom
Other CLECs: Clear Rate Communications, Full Service Network, IDT America, Metropolitan Telecommunications, Service Electric Telephone, Sprint Communications and Tri-Co Connections
Other Providers of Telecommunications Services: T-Mobile (Inreach) and Hamilton Relay Service

Appendix D-1

Classification of Consumer Complaints
Electric, Gas and Water

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D-2

Classification of Consumer Complaints
Telecommunications

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

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

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

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

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

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

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

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

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

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

All Other Problems - All other complaints that do not fit into the above categories, including complaints about extended area of service (limited local calling area), rates (general or specific rates are too high or the customer is being billed on the incorrect rate), and sales of non-basic service (including the availability of certain services). Also included are complaints that were taken in by BCS but closed before they could be investigated because the complainant resolved the complaint with the utility or withdrew the complaint. In addition, some complaints are non-jurisdictional.

Consumer Access to the Public Utility Commission

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

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

Consumers can get help online from the virtual assistant Aiva

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

Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

Information about the PUC is available on the internet:

www.puc.pa.gov

PAPUC

Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
www.puc.pa.gov
1-800-692-7380