

Utility Consumer Activities Report and Evaluation



2023

PENNSYLVANIA PUBLIC UTILITY COMMISSION

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



Utility Consumer Activities Report and Evaluation (UCARE) 2023

January 2025

Published by:

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

Bureau of Consumer Services

Table of Contents

- Executive Summary..... iv

- 1. Introduction 1
 - Impact of COVID-19 Pandemic..... 1

- 2. The Bureau of Consumer Services (BCS)..... 3
 - Informal Complaints Received by BCS 3
 - BCS Management of Informal Complaint Data..... 4
 - BCS Complaints Appealed 4
 - BCS Feedback Survey 4
 - Complaints Excluded from Analysis by BCS 7
 - Mediated Complaints Sent to OALJ from BCS..... 7

- 3. Categories of Residential Consumer Complaints..... 9
 - Total Volume 9
 - Consumer Complaints Analyzed by BCS 9
 - Classification of Consumer Complaints..... 12
 - Payment Arrangement Requests 12
 - Inquiries..... 14

- 4. Performance Measures..... 16
 - Informal Compliance Process and Infractions 16
 - Total Complaint Rate..... 16
 - Consumer Complaint Rate 16
 - Justified Consumer Complaint Rate..... 17
 - Percent of Justified Consumer Complaints 17
 - Response Time to Consumer Complaints 17
 - Payment Arrangement Request (PAR) Rate 18
 - Justified Payment Arrangement Request (PAR) Rate 18
 - Percent of Justified Payment Arrangement Requests (PARs)..... 18
 - Response Time to Payment Arrangement Requests 18
 - Termination Rate 19
 - Infraction Rate..... 19
 - Universal Service and Energy Conservation Programs / Other Low-Income Programs 19

- 5. Electric Industry 21
 - Total Complaint Numbers and Rates 22
 - Consumer Complaints 23
 - Consumer Complaint Categories 23
 - Consumer Complaint Rate, Justified Consumer Complaint Rate, and Percent of Justified Consumer Complaints 25
 - Consumer Complaint Response Time 28
 - Payment Arrangement Requests 29
 - PAR Rate, Justified PAR Rate, and Percent of Justified PARs..... 30
 - PAR Response Time..... 33

Termination and Reconnection of Service.....	34
Compliance.....	36
Electric Industry Chapter Summary	37
6. Natural Gas Industry	39
Total Complaint Numbers and Rates	39
Consumer Complaints.....	40
Consumer Complaint Categories	40
Consumer Complaint Rate, Justified Consumer Complaint Rate, and Percent of Justified Consumer Complaints	42
Consumer Complaint Response Time	44
Payment Arrangement Requests	45
PAR Rate, Justified PAR Rate, and Percent of Justified PARs.....	46
PAR Response Time.....	48
Termination and Reconnection of Service.....	49
Compliance.....	50
Natural Gas Industry Chapter Summary	52
7. Water Industry.....	53
Total Complaint Numbers and Rates	54
Consumer Complaints.....	55
Consumer Complaint Categories	55
Consumer Complaint Rate, Justified Consumer Complaint Rate, and Percent of Justified Consumer Complaints	57
Consumer Complaint Response Time	62
Payment Arrangement Requests	63
PAR Rate, Justified PAR Rate, and Percent of Justified PARs.....	64
PAR Response Time.....	68
Termination and Reconnection of Service.....	69
Compliance.....	71
Municipal Water, Sewer and Stormwater	73
Total Complaint Numbers and Rates	75
Inquiries.....	75
Consumer Complaints.....	75
Consumer Complaint Response Time	76
Payment Arrangement Requests	76
PAR Response Time.....	77
Termination and Reconnection of Service.....	77
Stormwater Complaints	78
Programs That Assist Low-Income Customers.....	79
Water Industry Chapter Summary	81
8. Telecommunications Industry.....	83
Total Complaint Numbers and Rates	85
Consumer Complaints.....	86
Consumer Complaint Categories	87
Consumer Complaint Rate, Justified Consumer Complaint Rate, and Percent of Justified Consumer Complaints	87

Consumer Complaint Response Time	90
Payment Arrangement Requests (PARs).....	91
PAR Rate, Justified PAR Rate, and Percent of Justified PARs.....	93
PAR Response Time.....	95
Termination of Service	96
Compliance.....	97
Universal Service Programs.....	99
Lifeline	99
Universal Telephone Assistance Program.....	101
Automatic Notification Program	101
ETC Designation	101
Non-Traditional ETC Designation	102
National Lifeline Verifier	103
Chapter 30 Broadband	104
Telecommunications Industry Chapter Summary	105
9. Non-Major Utilities	107
Electric and Natural Gas Supplier Activity.....	107
Residential Informal Complaints for Non-Major Utilities	108
Glossary of Terms	115
List of Acronyms	118
Appendix A: Number of Residential Customers	120
Appendix B-1: Categories of Infractions for Electric, Gas and Water.....	122
Appendix B-2: Categories of Infractions for Telecommunications.....	123
Appendix C-1: Classification of Consumer Complaints for Electric, Gas and Water	124
Appendix C-2: Classification of Consumer Complaints for Telecommunications	126

Executive Summary

The Bureau of Consumer Services presents its annual assessment of the major utilities in the 2023 Utility Consumer Activities Report and Evaluation (UCARE). Assembled in one comprehensive report, the UCARE focuses on case handling activity relative to the major electric, gas, water, and telecommunications utilities. The annual UCARE reports have been prepared to meet the statutory reporting requirement of 66 Pa.C.S. § 308(d) and to communicate to the public and the utility industry how jurisdictional utilities performed relative to informal complaint activity in 2023.

Starting in 2020, the number of complaints received was impacted due to both the direct and indirect effects of the COVID-19 pandemic and efforts to address the public health crisis. Other data was impacted as well, such as the Electric Distribution Companies (EDCs) and Natural Gas Distribution Companies (NGDCs) conducting fewer terminations and reconnections, compared to previous years. Although the effects lingered into the next few years, complaint levels essentially returned to pre-pandemic levels in 2023.

For the first time, industry chapter summaries appear at the end of each of the [electric](#), [gas](#), [water](#) and [telecommunications](#) industry chapters to provide an overview of industry trends, analyses and key individual utility performances.

A [Non-Major Utilities](#) chapter has been added to this edition of the UCARE report. All of the information and data for the non-major utilities previously found in the early chapters of the report have been moved into this newly-created chapter. Additionally, the table listing the non-major companies with residential informal complaints, formerly found in Appendix C, also appears in the new Non-Major Utilities chapter.

Assistance programs for the water and telecommunications industries are highlighted in Chapters [7](#) and [8](#) of this annual UCARE report. Assistance programs for the electric and gas industries are presented in the [Universal Service Programs and Collections Performance reports](#).

In 2023, BCS received a total of 142,866 contacts by consumers. Of those contacts, 60,606 needed further investigation ([Consumer Complaints](#) and [PARs](#)), which was up from the previous year and slightly higher than the pre-COVID year 2019.

BCS also received 17,301 [inquiries](#) in 2023, which is still below the 2019 pre-COVID data. These inquiries may also represent some non-jurisdictional dismissals. The top three reasons for contact were calls regarding customers that did not qualify for a new PAR to maintain their utility service, termination or suspension of service, and non-jurisdictional complaints.

Billing disputes were the number one reason for Consumer Complaints in the [electric](#), [gas](#), and [water](#) industries in 2023. The number one reason for residential [telecommunications](#) Consumer Complaints was unsatisfactory service.

Prior to 2022, BCS used a third party to conduct the [BCS Feedback Survey](#), sampling complainants who have contacted BCS. BCS took the function in-house in 2022 and found opportunities to recalibrate the survey process by changing the delivery of the surveys from USPS hard copy to electronic methods, taking advantage of new technology. This change allowed BCS to separate the Intake function, those staff who open the complaints, from the Investigative function. The survey sampling percentage and number of surveys sent were significantly increased from an annual average of approximately 5,000 total surveys to over 31,000 Intake surveys and over 28,000 Investigative surveys in 2022 and over 36,800 Intake surveys and over 32,300 Investigative surveys in 2023.

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 Act¹](#)
 - [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 2023 concerning the electric, natural gas, water and telecommunications industries under the PUC's jurisdiction. For comparative purposes, the 2023 data in this report is presented alongside data from prior years. Where appropriate, some of the data presented in this report is based on a statistically valid sampling of informal complaints and is noted as such throughout the report.

Impact of COVID-19 Pandemic

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

¹ Despite the sunset of Chapter 14 in 2024, the provisions of Chapter 14 were applicable during the timeframe in this report.

To address public health and safety concerns, on March 6, 2020, former Governor Tom Wolf issued a Proclamation of Disaster Emergency in response to the COVID-19 pandemic (*Emergency Proclamation*).² On March 13, 2020, former Chairman Gladys Brown Dutrieuille issued an *Emergency Order* which prohibited jurisdictional public utilities from terminating service during the duration of the *Emergency Proclamation* unless termination of service was necessary to ameliorate a safety emergency or unless otherwise determined by the Commission. The *Emergency Order* also encouraged utilities to reconnect previously terminated service if such action could be done safely.³

On Oct. 13, 2020, the Commission entered an Order modifying the *Emergency Order* (October 2020 Order).⁴ The October 2020 Order lifted the termination moratorium for certain customers effective Nov. 9, 2020, but continued the termination moratorium for “protected customers” at or below 300% of the Federal Poverty Income Guidelines (FPIG), under certain conditions, and established protections for certain residential and small business customers. The termination moratorium and protections established by the October 2020 Order expired on March 31, 2021.

Starting in 2020, the number of complaints received was impacted due to the direct and indirect effects of the COVID-19 pandemic and efforts to address the public health crisis. Other data was impacted as well, such as EDCs and NGDCs conducting fewer terminations and reconnections, compared to previous years. Although the effects lingered into the next few years, complaint levels essentially returned to pre-pandemic levels in 2023.

² <https://www.fmcsa.dot.gov/sites/fmcsa.dot.gov/files/2020-03/Pennsylvania%2020200306-COVID19-Digital-Proclamation.pdf>.

³ See Public Utility Service Termination Moratorium Proclamation of Disaster Emergency-COVID-19, Docket No. [M-2020-3019244](https://www.puc.pa.gov/pcdocs/1658422.pdf) (Emergency Order ratified on March 26, 2020) <https://www.puc.pa.gov/pcdocs/1658422.pdf>.

⁴ 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) <https://www.puc.pa.gov/pcdocs/1682379.doc>.

2. The Bureau of Consumer Services (BCS)

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

Informal Complaints Received by BCS

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

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

- Inquiries,
- Consumer Complaints, and
- Payment Arrangement Requests (PARs)

BCS collectively refers to Consumer Complaint and PAR categories as "informal complaints." Inquiries were resolved during the first contact or call-back. Inquiries include complaints that do not require further investigation on the part of BCS.

BCS reclassified some contacts that originated as Consumer Complaints and PARs into the Inquiry 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, complaints filed against a non-jurisdictional utility, and complaints where customers had not previously contacted their utilities. Inquiries 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 2023, BCS received 142,866 contacts from consumers including 60,606 contacts that required further investigation (Consumer Complaints and PARs) and 17,301 Inquiries. BCS determined 88% of the 2023 complaints investigated and reviewed were appropriately handled by the subject utilities prior to BCS intervention.

The primary focus of this report is 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 has 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 or the utility does not agree with the outcome or result of a BCS determination. Complainants can file a formal appeal and seek a decision from a presiding officer in the PUC's Office of Administrative Law Judge (OALJ). The following table shows the percentage of BCS informal complaints appealed to OALJ and the number of BCS informal complaints where the OALJ determined an outcome that was different from the BCS investigators' original decision. The appealed percentage is typically below 1% and the number of BCS informal complaints with different outcomes is minimal and shows the competency of the BCS investigators' work.

Informal Complaint Appeal Rate

Year	BCS Informal Complaints	BCS Informal Complaints Appealed	Percent of BCS Informal Complaints Appealed	OALJ Outcome Different than BCS
2019	59,111	511	0.87%	3
2020	13,297	401	3.02%	3
2021	28,474	244	0.86%	0
2022	47,727	403	0.85%	0
2023	60,606	474	0.79%	2

BCS Feedback Survey

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

The BCS survey sampling was significantly increased. In 2021 and prior, there were an average of approximately 5,000 surveys distributed annually. Starting in 2022, BCS has distributed over 31,000 Intake

surveys and over 28,000 Investigative surveys. These changes ensure that the surveys represent statistically valid sample sizes, accurately reflect the performance of all related staff, and align practices with more current and timely survey methods. In 2023, BCS distributed over 36,800 Intake surveys and over 32,300 Investigative surveys. The overall survey response rate in 2023 was 10.6%.

The following table presents additional information about how complainants rated the service they received from BCS intake staff in 2022 and 2023.

Ratings of BCS Service – Intake

How easy was it to reach the PUC's Bureau of Consumer Services (BCS)?		
	2022	2023
Very easy	59.6%	61.1%
Fairly easy	29.2%	28.8%
Somewhat Difficult	7.3%	6.7%
Difficult	3.5%	3.0%
Don't recall	0.2%	0.1%
Was this the first time you contacted BCS about this problem?		
	2022	2023
Yes	71.9%	75.9%
No	25.2%	21.5%
Don't recall	2.7%	2.4%
If you contacted BCS by phone, how polite was the first person who helped you?		
	2022	2023
Very polite	93.4%	92.7%
Fairly polite	4.4%	5.1%
Not very polite	0.7%	0.5%
Not at all polite	0.5%	0.6%
Don't recall	0.2%	0.3%
Did not speak to a person	0.0%	0.0%
Did the person seem interested in helping you with your problem?		
	2022	2023
Very interested	86.6%	86.1%
Fairly interested	10.2%	10.6%
Not very interested	1.6%	1.4%
Not at all interested	0.7%	0.9%
Don't recall	0.3%	0.3%
Did not speak to a person	0.3%	0.5%
Do you feel like the person you spoke with at the PUC understood your problem?		
	2022	2023
Yes	96.3%	95.8%
No	2.6%	2.9%
Don't recall	0.6%	0.4%
Did not speak to a person	0.3%	0.4%

According to the survey results for the intake staff on the table above, 97.8% of complainants who contacted BCS in 2023 rated the person they spoke with on the phone as “very polite” or “fairly polite” and 95.8% felt the BCS intake staff understood the complaint problem or issue.

The following table presents additional information about how complainants rated the service they received from BCS investigators in 2021, 2022 and 2023. As previously mentioned, the survey process was brought in-house in 2022 when the delivery methods were changed from USPS mailed hard copy versions to electronically emailed copies and survey sampling was drastically increased.

According to the survey results for the investigators on the table that follows, 57.3% of complainants who contacted BCS in 2023 rated the BCS’s service as “excellent” or “good.” When asked if they would contact the PUC again for help, 63.0% of complainants said “yes.” BCS found many factors influence the survey results. As an example, frequently those who respond to the surveys are individuals who did not receive a favorable informal decision from BCS, and they are not pleased with the outcome. Therefore, BCS takes those factors into consideration when evaluating the survey results in the tables below.

Ratings of BCS Service – Investigators

How would you rate the service you received from the PUC (BCS)?			
	2021	2022	2023
Excellent	58.4%	51.1%	44.2%
Good	24.6%	11.8%	13.1%
Fair	8.6%	10.0%	11.7%
Poor	8.4%	26.1%	29.7%
How quickly did the PUC handle your request?			
	2021	2022	2023
Very quickly	45.0%	44.3%	36.6%
Fairly quickly	35.5%	28.6%	26.8%
Not very quickly	7.5%	9.2%	12.2%
Not at all quickly	5.4%	9.6%	15.2%
Don't recall	0.6%	1.4%	1.4%
Have not heard from PUC	6.2%	6.0%	6.7%
How easy to understand was the information the PUC gave you in writing?			
	2021	2022	2023
Very easy	59.4%	38.4%	37.7%
Fairly easy	19.6%	14.4%	17.7%
Not very easy	3.6%	3.3%	3.8%
Not at all easy	2.1%	4.8%	4.6%
Don't recall	1.6%	2.5%	3.1%
Did not receive anything in writing	13.7%	35.2%	32.2%
If you had another problem with a utility, would you contact the PUC again?			
	2021	2022	2023
Yes	85.0%	69.0%	63.0%
No	5.7%	14.0%	17.6%
Not sure	9.3%	16.1%	18.6%

Complaints Excluded from Analysis by BCS

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

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

Commercial complaints were also excluded from the data used in the analyses. Although BCS's regulatory authority has largely been confined to residential accounts, the Bureau handled 1,550 complaints from commercial complainants in 2023, including 518 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			
	2021	2022	2023
Duquesne	7	12	14
Met-Ed	8	18	12
PECO+	3	27	12
Penelec	7	14	8
Penn Power	5	12	5
PPL	3	12	24
UGI-Electric	3	2	4
West Penn	11	18	18
GAS			
	2021	2022	2023
Columbia	0	2	4
NFG	1	1	1
Peoples	4	3	2
PGW	18	25	21
UGI Gas	4	23	18
WATER			
	2021	2022	2023
Aqua	6	3	3
PAWC	13	8	12
Audubon	0	0	0
Columbia	0	0	4
Community Utilities	0	0	0
Newtown Artesian	0	0	0
Veolia Bethel	0	0	0
Veolia PA	1	0	0
York	0	0	0
MUNICIPAL			
	2021	2022	2023
PWSA-Water	4	1	0
PWSA-Sewer	0	4	1
TELECOMMUNICATIONS			
	2021	2022	2023
Brightspeed f/k/a CenturyLink	0	0	0
Frontier Commonwealth	1	0	2
Verizon North	0	0	0
Verizon PA	5	3	2
Windstream	1	0	2

+ PECO statistics include electric and gas.

3. Categories of Residential Consumer Complaints

Total Volume

The following table compares the volume of all residential Consumer Complaints and PARs to the volume of all commercial Consumer Complaints and PARs handled by BCS in 2023. This table represents “investigated complaints” only and does not include 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.

Total Volume of Consumer Complaints and Payment Arrangement Requests (PARs) to BCS in 2023

Industry	Consumer Complaints		Payment Arrangement Requests	
	Residential	Commercial	Residential	Commercial
Electric	11,957	637	26,950	228
Gas	2,564	142	12,375	270
Water	1,453	92	2,519	17
Telecommunications	1,077	153	11	0
Other	84	8	66	3
Total	17,135	1,032	41,921	518

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 2021-23

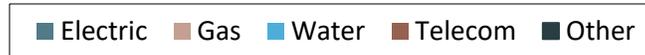
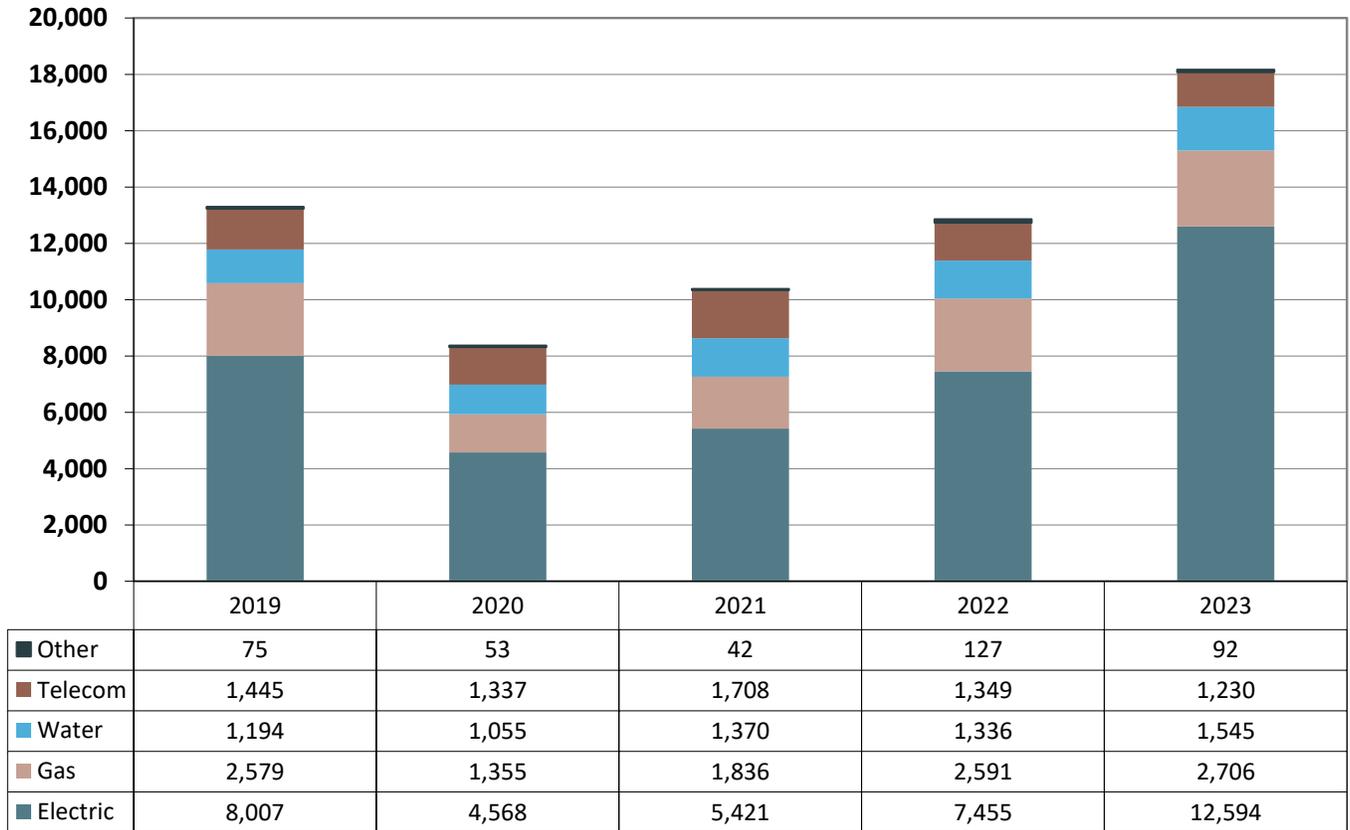
Industry	2021	2022	2023
Electric	5,421	7,455	12,594
Gas	1,836	2,591	2,706
Water	1,370	1,336	1,545
Telecommunications	1,708	1,349	1,230
Other	42	127	92
Total	10,377	12,858	18,167

The above table includes the combined total of residential and commercial Consumer Complaints. The electric and gas utilities' volume accounted for 84% of all Consumer Complaints investigated by BCS in 2023.

In 2023, 69% (12,594) of these complaints were electric and 15% (2,706) of these complaints were natural gas, while telecommunications utilities totaled approximately 7% (1,230), and water utilities accounted for 9% (1,545). The substantial increase in consumer complaints in the electric industry was largely driven by the significant billing issues at PPL in 2023, which resulted in a 942.8% increase from 566 consumer complaints for PPL in 2021 to 5,902 in 2023.⁵

⁵ On April 25, 2024, the Commission modified a settlement with PPL over consumer billing issues that impacted over 800,000 customers throughout much of 2023. The investigation centered on billing issues in response to large numbers of consumer calls and complaints about unusually high or low estimated bills, missing monthly bills, and the lack of adequate customer service support resulting in consumers being unable to reach PPL Call Center representatives to discuss their billing concerns. Docket No. [M-2023-3038060](#).

Consumer Complaints by Industry



The following table presents a comparison of the number of residential and commercial Consumer Complaints for 2021, 2022 and 2023.

Consumer Complaints to BCS in 2021-23

Industry	Consumer Complaints					
	Residential			Commercial		
	2021	2022	2023	2021	2022	2023
Electric	5,056	6,868	11,957	365	587	637
Gas	1,722	2,423	2,564	114	168	142
Water	1,272	1,234	1,453	98	102	92
Telecommunications	1,566	1,201	1,077	142	148	153
Other	41	117	84	1	10	8
Total	9,657	11,843	17,135	720	1,015	1,032

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 [electric](#), [gas](#), [water](#) and [telecommunications](#) 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 2004⁶ 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.⁷ 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.⁸ 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.⁹ BCS is required to provide a report detailing the impact of Chapter 14 every five years. The recent quinquennial report, *The Seventh 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 Dec. 20, 2024.¹⁰

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 2023, BCS handled 42,439 PARs from customers of the utilities under the Commission’s jurisdiction. This table includes both residential and commercial PARs.

⁶ 66 Pa.C.S. § 1401-1418

⁷ 66 Pa.C.S. § 1402

⁸ Small natural gas distribution utilities may voluntarily “opt in” to Chapter 14. 66 Pa.C.S. § 1403.

⁹ Docket No. [L-2015-2508421](#), published in Pennsylvania Bulletin June 1, 2019.

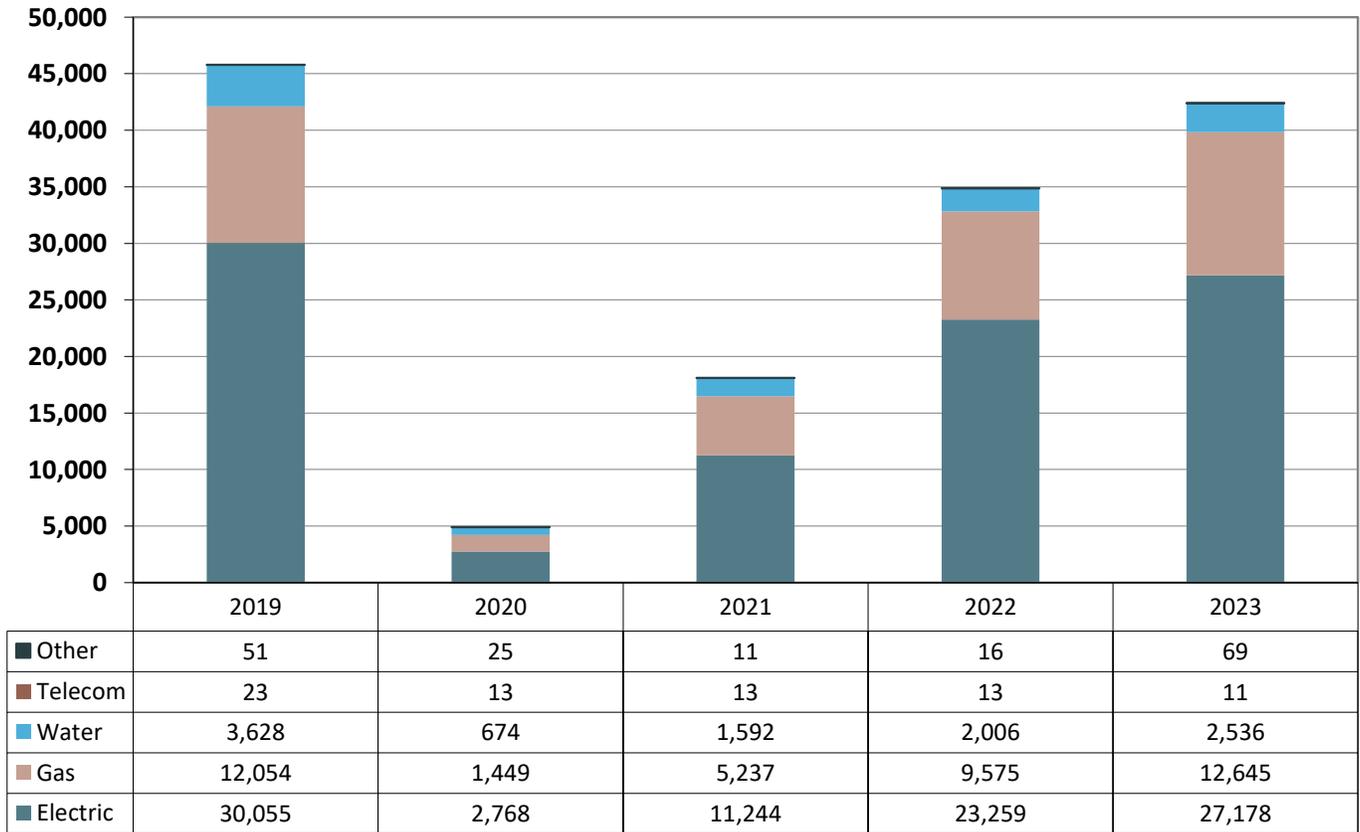
¹⁰ https://www.puc.pa.gov/media/3278/2024-chapter-14-report_final.pdf

Payment Arrangement Requests (PARs) by Industry 2021-23

Industry	2021	2022	2023
Electric	11,244	23,259	27,178
Gas	5,237	9,575	12,645
Water	1,592	2,006	2,536
Telecommunications	13	13	11
Other	11	16	69
Total	18,097	34,869	42,439

As in past years, most requests for payment arrangements in 2023 involved electric or gas utilities. As shown in the table above, 64% (27,178) of PARs in 2023 were from electric customers and 30% (12,645) were from gas customers. Also, 6% (2,536) of PARs in 2023 came from customers of various water utilities and less than 1% (11) of PARs in 2023 came from telecommunications customers. The following table presents a comparison of the number of residential and commercial PARs for 2021, 2022 and 2023.

PARs by Industry



Payment Arrangement Requests (PARs) to BCS in 2021-23

Industry	Payment Arrangement Requests					
	Residential			Commercial		
	2021	2022	2023	2021	2022	2023
Electric	11,028	23,058	26,950	216	201	228
.Gas	5,095	9,408	12,375	142	167	270
Water	1,578	1,991	2,519	14	15	17
Telecommunications	13	13	11	0	0	0
Other	10	15	66	1	1	3
Total	17,724	34,485	41,921	373	384	518

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

Inquiries

The total number of Inquiries BCS received in 2023 was 17,301. Inquiries are contacts that did not require follow-up investigation beyond the initial contact or call-back. The Inquiries for 2023 include contacts to the BCS via the Consumer Complaint Hotline, mail, website, fax and email.

BCS reclassifies certain requests for payment arrangements as Inquiries; therefore, they are not represented in the number of PARs in the tables in this report. For example, BCS does not issue payment decisions for complainants that are actively enrolled in utility Customer Assistance Programs (CAPs) or requests to restore or avoid suspension / termination of toll or non-basic telecommunications service. Similarly, if a complainant has recently been through the BCS payment arrangement process and calls again with a new request, without a change in income or significant change in circumstances¹¹, BCS does not open a new PAR complaint for investigation. In these instances, BCS dismisses the complaint at the initial contact and classifies the contact as an Inquiry.

As previously mentioned, BCS reclassified some contacts that originated as Consumer Complaints and PARs as Inquiries. The Inquiries are excluded from analysis within this report. They are not counted as informal complaints. Reclassified Inquiries (1,305 in 2023) accounted for 8% of Inquiries in 2023 and are included in the following table.

¹¹ 66 Pa.C.S. § 1402 Definitions of "Change in Income" and "Significant Change in Circumstance" in conjunction with 66 Pa.C.S. § 1405 Payment Arrangements.

Inquiry Reason for Contact Categories in 2023

Reason for Contact	Number	Percent*
Unable to open new PAR – service on	3,341	19.3%
Termination or suspension of service	3,160	18.3%
PUC has no jurisdiction	2,951	17.1%
CAP inquiry/contact	1,484	8.6%
Billing dispute	1,329	7.7%
Request for general information	840	4.9%
Rate protest	557	3.2%
Applicant/deposit issue	382	2.2%
Service (utility facilities)	363	2.1%
Competition issues and requests for information	350	2.0%
People-delivered utility service**	302	1.8%
Unable to open new PAR – service off	191	1.1%
Weather outage	22	0.1%
Cramming**	2	<1.0%
Rate complaint	0	0.0%
Slamming**	0	0.0%
Other miscellaneous reasons**	1,211	7.0%
Reason for contact is not available	816	4.7%
Total	17,301	100.1%

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

** Please refer to the Glossary of Terms.

4. 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 electric, gas, water and telecommunications industry chapters of this report¹², 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 2021, 2022 and 2023. The tables in the following electric, gas, water and telecommunications industry chapters present the data alphabetically by utility name for major utilities, as defined within the sections.

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 the 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 (Consumer Complaints, PARs, and Inquiries combined) per 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

¹² 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/>.

indicative of patterns and trends that should be investigated. BCS considers the “justified Consumer Complaint rate” (justified Consumer Complaints per 1,000 residential customers) a better indicator of a utility’s complaint handling performance.

Justified Consumer Complaint Rate

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

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

BCS monitors the complaint rates and justified rates of the major utilities. When BCS finds below-average performance, it may indicate improper dispute handling. In the electric, gas, water and telecommunications 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 electric, gas, water and telecommunications industry chapters, response time is presented as the average of a utility’s responses in the tables titled Average Response Time to BCS.

Payment Arrangement Request (PAR) Rate

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

Justified Payment Arrangement Request (PAR) Rate

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

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

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

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

Percent of Justified Payment Arrangement Requests (PARs)

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

Response Time to Payment Arrangement Requests

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

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

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

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

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

Termination Rate

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

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

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

The termination rate for the electric, gas, water and telecommunications industries is the number of service terminations divided by the number of residential customers.

Infraction Rate

BCS compares utilities of various sizes within an industry by using a measure called the infraction rate. The infraction rate is the number of verified infractions per 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 2023 infraction rates in the 2024 report.

Infraction rates are shown for 2021, 2022 and 2023 in the upcoming electric, gas, water and telecommunications industry chapters. The electric, gas, and water industry chapters show the 2023 infractions of Chapter 56, Chapter 14 and other applicable regulations. The telecommunications industry chapter shows the infractions of Chapters 30, 63, 64 and other applicable regulations.

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

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

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

In September 2024, the Commission released the 24th annual report on Universal Service Programs and Collections Performance, which presents 2023 universal service and collections data for the major electric and natural gas distribution companies. The Universal Service Programs and Collections Performance reports are available on the Commission's website at: <https://www.puc.pa.gov/filing-resources/reports/universal-service-reports/>

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

5. Electric Industry

In 2023, 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. See the [Non-Major Utilities](#) chapter for complaints regarding the non-major electric companies.

On Dec. 7, 2023, the Commission approved a joint settlement¹³ that addressed all issues related to the consolidation of Met-Ed, Penelec, Penn Power and West Penn into the FirstEnergy Pennsylvania Electric Company. Under the terms of the settlement, the current rate structure of each rate district will continue over a period covering three rate cases filed on or after Jan. 1, 2025, or ten years from the date of the Commission’s approval of the merger, whichever comes first. In the meantime, BCS has continued tracking the FirstEnergy data separately by each individual rate district.

The statistics in the tables on the pages that follow depict the performance of each of the seven major electric utilities in 2023. 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.

¹³ <https://www.puc.pa.gov/pcdocs/1808189.pdf>

Total Complaint Numbers and Rates

The following table shows the total number of all complaints, Consumer Complaints, PARs, and Inquiries combined. The total complaint rate is the total number of complaints per 1,000 residential customers.

2021-23 Residential Total Complaint Numbers/Rates Major Electric Distribution Companies

Utility	2021		2022		2023	
	Number	Rate	Number	Rate	Number	Rate
Duquesne	2,612	4.81	3,646	6.68	4,328	7.90
Met-Ed	2,132	4.16	3,977	7.72	4,930	9.51
PECO+	4,338	2.83	9,492	6.17	9,951	6.43
Penelec	2,242	4.47	4,357	8.70	5,063	10.11
Penn Power	594	4.01	1,329	8.92	1,454	9.71
PPL	4,464	3.57	7,348	5.85	13,832	10.96
UGI-Electric	278	5.05	708	12.84	964	17.47
West Penn	2,433	3.85	4,756	7.53	5,364	8.48
Total	19,093		34,905		45,886	
Industry Average*		3.68		6.79		8.71

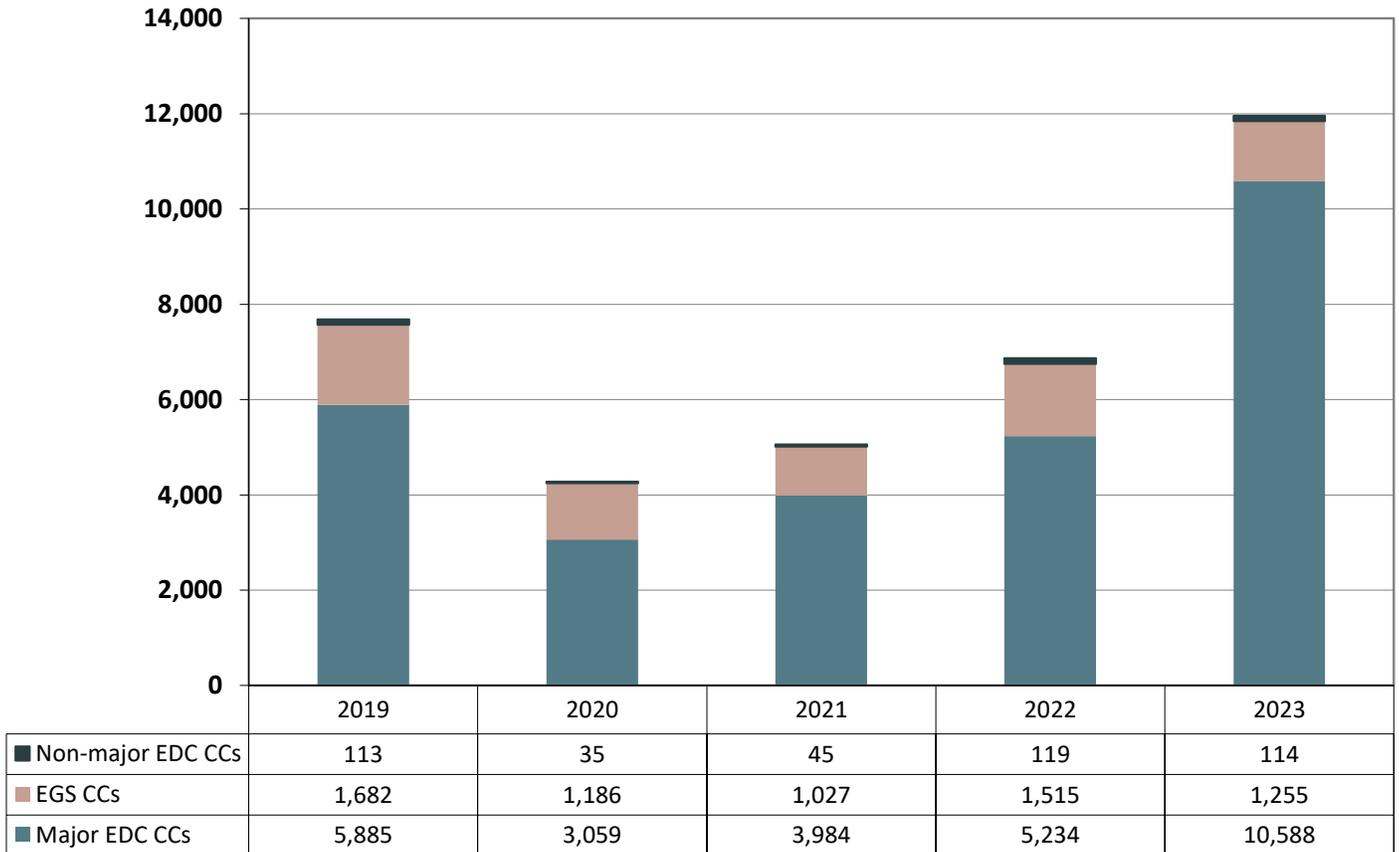
* Does not include UGI-Electric.

+ PECO statistics include electric and gas.

Consumer Complaints

During 2023, BCS handled 11,957 Consumer Complaints from residential electric consumers of the various EDCs (10,702) and EGSs (1,255). The seven major EDCs represented 89% (10,588) of the total Consumer Complaints.

Residential Consumer Complaints (CCs) - Electric



Consumer Complaint Categories

The following table shows the number and percentage of 2023 complaints in each of the 14 categories used by BCS policy analysts for compliance evaluation. These categories are based on all evaluated residential complaints filed with BCS in 2023 and evaluated by BCS as of April 12, 2024. See [Appendix C-1](#) for an explanation of the categories.

Number and Percent of Consumer Complaints by Dispute Category
2023 Complaints Evaluated
Major Electric Distribution Companies

Category	Duquesne	Met-Ed	PECO+	Penelec	Penn Power	PPL	UGI-Electric	West Penn	Electric Industry*
Billing Disputes	115	127	126	102	38	274	32	77	891
	25%	29%	25%	23%	22%	57%	36%	17%	29%
Termination or PAR Procedures	74	25	54	40	12	4	9	32	250
	16%	6%	11%	9%	7%	1%	10%	7%	8%
Credit and Deposits	12	61	49	58	24	2	4	39	249
	3%	14%	10%	13%	14%	<1%	4%	9%	8%
Service Quality	33	39	59	31	5	9	8	65	249
	7%	9%	12%	7%	3%	2%	9%	14%	8%
Service Interruptions	28	45	22	39	19	17	0	44	214
	6%	10%	4%	9%	11%	4%	0%	10%	7%
Personnel Problems	46	27	27	36	12	9	6	35	198
	10%	6%	5%	8%	7%	2%	7%	8%	6%
Metering	7	6	7	10	3	139	3	3	178
	2%	1%	1%	2%	2%	29%	3%	1%	6%
Damages	22	22	18	16	9	6	1	40	134
	5%	5%	4%	4%	5%	1%	1%	9%	4%
Discontinuance / Transfer	18	12	37	23	6	7	6	19	128
	4%	3%	7%	5%	4%	1%	7%	4%	4%
Other Payment Issues	23	20	27	22	10	3	0	10	115
	5%	4%	5%	5%	6%	1%	0%	2%	4%
Scheduling Delays	9	16	8	9	11	5	2	38	98
	2%	4%	2%	2%	6%	1%	2%	8%	3%
Rates	3	3	1	3	0	1	1	3	15
	1%	1%	<1%	1%	0%	<1%	1%	1%	<1%
Service Extensions	0	0	0	1	0	0	0	1	2
	0%	0%	0%	<1%	0%	0%	0%	<1%	<1%
All Other Problems	68	42	74	55	21	7	17	45	329
	15%	9%	15%	12%	12%	1%	19%	10%	11%
Total	458	445	509	445	170	483	89	451	3,050

* Electric Industry column does not include UGI-Electric.

+ PECO statistics include electric and gas.

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

The following tables show the Consumer Complaint Rate, the Justified Consumer Complaint Rate, and the Percent of Justified Consumer Complaints for each major EDC in 2021, 2022 and 2023. A complaint is considered “justified” if it is found that the utility did not comply with Commission Orders, policies, regulations, reports, Secretarial Letters, or tariffs. BCS evaluates a statistically valid sampling of complaints for each utility.

The Consumer Complaint rate is the number of Consumer Complaints per 1,000 residential customers. The justified Consumer Complaint numbers are estimated based on the number of Consumer Complaints when BCS closes the dataset for analyses, after all of the internal processes involving the evaluation and analysis of the data have occurred: 2021 as of Sept. 10, 2022; 2022 as of May 5, 2023; and 2023 as of April 12, 2024. The date varies each year, due to multiple factors that can impact the investigation and closure of cases and/or the evaluation of the statistically valid sampling of cases for each utility and/or the analysis of the data (e.g., caseload fluctuations, staffing fluctuations/changes, systemic issues, etc.). The justified Consumer Complaint rate is the estimated number of justified Consumer Complaints per 1,000 residential customers based on a statistically valid sampling of complaints. The justified Consumer Complaint rate is a normalized ratio useful for comparing utility performance among the various companies. It is not a percentage.

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.

The substantial increase in consumer complaints, as well as the justified consumer complaints, was largely driven by the significant billing issues at PPL in 2023, which resulted in a 942.8% increase from 566 consumer complaints for PPL in 2021 to 5,902 in 2023.

2023 Residential Consumer Complaint Rate, Justified Consumer Complaint Rates, and Percent of Justified Consumer Complaints Major Electric Distribution Companies

Utility	Consumer Complaint Rate	Justified Consumer Complaint Rate	Percent of Justified Consumer Complaints
Duquesne	1.14	0.06	5.0%
Met-Ed	1.53	0.09	6.1%
PECO+	0.99	0.08	7.9%
Penelec	1.36	0.09	6.5%
Penn Power	1.39	0.06	4.3%
PPL	4.68	1.67	35.6%
UGI-Electric	1.88	0.13	6.7%
West Penn	1.35	0.05	3.7%
Industry Average*	1.78	0.30	22.5%

* Does not include UGI-Electric.

+ PECO statistics include electric and gas.

**2021-23 Residential Consumer Complaint Numbers/Rates
Major Electric Distribution Companies**

Utility	2021		2022		2023	
	Number	Rate	Number	Rate	Number	Rate
Duquesne	565	1.04	639	1.17	624	1.14
Met-Ed	499	0.97	635	1.23	792	1.53
PECO+	1,147	0.75	1,613	1.05	1,527	0.99
Penelec	522	1.04	619	1.24	679	1.36
Penn Power	118	0.80	170	1.14	208	1.39
PPL	566	0.45	806	0.64	5,902	4.68
UGI-Electric	44	0.80	112	2.03	104	1.88
West Penn	567	0.90	752	1.19	856	1.35
Total	4,028		5,346		10,692	
Industry Average*		0.85		1.09		1.78

* Does not include UGI-Electric.

+ PECO statistics include electric and gas.

**2021-23 Justified Residential Consumer Complaint Numbers/Rates
Major Electric Distribution Companies**

Utility	2021		2022		2023	
	Number	Rate	Number	Rate	Number	Rate
Duquesne	63	0.12	67	0.12	31	0.06
Met-Ed	53	0.10	58	0.11	48	0.09
PECO+	88	0.06	187	0.12	120	0.08
Penelec	49	0.10	55	0.11	44	0.09
Penn Power	6	0.04	11	0.07	9	0.06
PPL	37	0.03	48	0.04	2,102	1.67
UGI-Electric	7	0.13	5	0.09	7	0.13
West Penn	25	0.04	73	0.12	32	0.05
Total	328		504		2,393	
Industry Average*		0.07		0.10		0.30

* Does not include UGI-Electric.

+ PECO statistics include electric and gas.

**2021-23 Number/Percent of Justified Residential Consumer Complaints
Major Electric Distribution Companies**

Utility	2021		2022		2023	
	Number	Percent	Number	Percent	Number	Percent
Duquesne	63	11.2%	67	10.5%	31	5.0%
Met-Ed	53	10.6%	58	9.1%	48	6.1%
PECO+	88	7.7%	187	11.6%	120	7.9%
Penelec	49	9.4%	55	8.9%	44	6.5%
Penn Power	6	5.1%	11	6.5%	9	4.3%
PPL	37	6.5%	48	6.0%	2,102	35.6%
UGI-Electric	7	15.9%	5	4.5%	7	6.7%
West Penn	25	4.4%	73	9.7%	32	3.7%
Total	328		504		2,393	
Industry Average*		8.1%		9.5%		22.5%

* Does not include UGI-Electric.

+ PECO statistics include electric and gas.

Consumer Complaint Response Time

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

2021-23 Average Response Time to BCS Residential Consumer Complaints Major Electric Distribution Companies

Utility	Number of Days		
	2021	2022	2023
Duquesne	14.3	16.6	15.6
Met-Ed	15.4	18.6	15.2
PECO+	16.6	16.6	16.6
Penelec	14.3	19.0	14.9
Penn Power	14.7	18.8	14.9
PPL	19.0	24.6	17.2
UGI-Electric	8.2	12.1	19.6
West Penn	14.8	18.8	15.9
Industry Average*	15.7	18.4	16.5

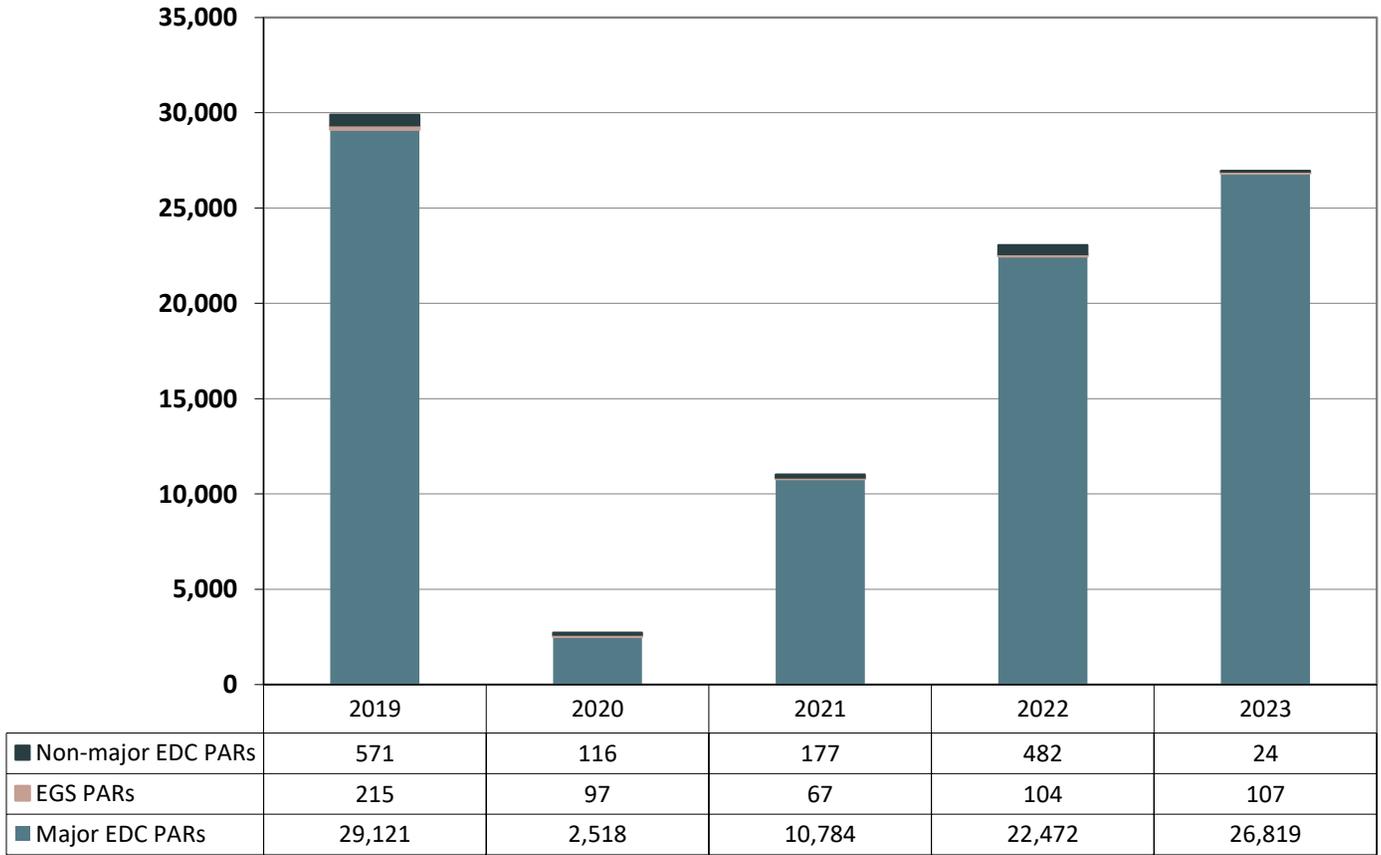
* Does not include UGI-Electric.

+ PECO statistics include electric and gas.

Payment Arrangement Requests

During 2023, BCS handled 26,950 PARs from residential electric customers of the various EDCs (26,843) and EGSs (107). The seven major EDCs represented nearly 100% (26,819) of the total PARs.

Residential PARs - Electric



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

The following tables show the PAR Rate, the Justified PAR Rate, and the Percent of Justified PARs for each major EDC in 2021, 2022 and 2023. A complaint is considered “justified” if it is found that the utility did not comply with Commission Orders, policies, regulations, reports, Secretarial Letters, or tariffs. BCS evaluates a statistically valid sampling of complaints for each utility.

The PAR rate is the number of PARs per 1,000 residential customers. The justified PAR numbers are estimated based on the number of PARs when BCS closes the dataset for analyses, after all of the internal processes involving the evaluation and analysis of the data have occurred: 2021 as of Sept. 10, 2022; 2022 as of May 5, 2023; and 2023 as of April 12, 2024. The date varies each year, due to multiple factors that can impact the investigation and closure of cases and/or the evaluation of the statistically valid sampling of cases for each utility and/or the analysis of the data (e.g., caseload fluctuations, staffing fluctuations/changes, systemic issues, etc.). The justified PAR rate is the estimated number of justified PARs per 1,000 residential customers based on a statistically valid sampling of complaints. It is not a percentage. The justified rate is a normalized ratio useful for comparing utility performance among the various companies.

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

2023 Residential Payment Arrangement Request (PAR) Rates, Justified PAR Rates, and Percent of Justified PARs Major Electric Distribution Companies

Utility	PAR Rate	Justified PAR Rate	Percent of Justified PARs
Duquesne	5.00	0.20	4.0%
Met-Ed	6.03	0.19	3.2%
PECO+	4.37	0.19	4.2%
Penelec	6.55	0.30	4.6%
Penn Power	6.53	0.31	4.7%
PPL	4.67	0.12	2.7%
UGI-Electric	12.00	0.54	4.5%
West Penn	5.32	0.14	2.6%
Industry Average*	5.50	0.21	3.6%

+ PECO statistics include electric and gas.

* Does not include UGI-Electric.

**2021-23 Residential Payment Arrangement Request (PAR) Numbers/Rates
Major Electric Distribution Companies**

Utility	2021		2022		2023	
	Number	Rate	Number	Rate	Number	Rate
Duquesne	1,523	2.80	2,334	4.28	2,743	5.00
Met-Ed	1,186	2.32	2,493	4.84	3,127	6.03
PECO+	2,126	1.39	6,072	3.95	6,773	4.37
Penelec	1,304	2.60	2,768	5.52	3,281	6.55
Penn Power	370	2.50	871	5.85	977	6.53
PPL	2,893	2.31	4,953	3.94	5,891	4.67
UGI-Electric	175	3.18	475	8.62	662	12.00
West Penn	1,382	2.19	2,981	4.72	3,365	5.32
Total	10,959		22,947		26,819	
Industry Average*		2.30		4.73		5.50

* Does not include UGI-Electric.

+ PECO statistics include electric and gas.

**2021-23 Justified Residential Payment Arrangement Request (PAR) Numbers/Rates
Major Electric Distribution Companies**

Utility	2021		2022		2023	
	Number	Rate	Number	Rate	Number	Rate
Duquesne	328	0.60	33	0.06	109	0.20
Met-Ed	175	0.34	38	0.07	101	0.19
PECO+	338	0.22	75	0.05	287	0.19
Penelec	153	0.30	61	0.12	151	0.30
Penn Power	50	0.34	21	0.14	46	0.31
PPL	335	0.27	43	0.03	157	0.12
UGI-Electric	19	0.34	22	0.40	30	0.54
West Penn	163	0.26	31	0.05	89	0.14
Total	1,561		324		970	
Industry Average*		0.33		0.08		0.21

* Does not include UGI-Electric.

+ PECO statistics include electric and gas.

**2021-23 Number/Percent of Justified Residential Payment Arrangement Requests (PARs)
Major Electric Distribution Companies**

Utility	2021		2022		2023	
	Number	Percent	Number	Percent	Number	Percent
Duquesne	328	21.5%	33	1.4%	109	4.0%
Met-Ed	175	14.8%	38	1.5%	101	3.2%
PECO+	338	15.9%	75	1.2%	287	4.2%
Penelec	153	11.7%	61	2.2%	151	4.6%
Penn Power	50	13.5%	21	2.4%	46	4.7%
PPL	335	11.6%	43	0.9%	157	2.7%
UGI-Electric	19	10.9%	22	4.6%	30	4.5%
West Penn	163	11.8%	31	1.0%	89	2.6%
Total	1,561		324		970	
Industry Average*		14.3%		1.3%		3.6%

* Does not include UGI-Electric.

+ PECO statistics include electric and gas.

PAR Response Time

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

2021-23 Average Response Time to BCS Residential Payment Arrangement Requests (PARs) Major Electric Distribution Companies

Utility	Number of Days		
	2021	2022	2023
Duquesne	8.5	8.6	8.2
Met-Ed	7.3	12.3	9.1
PECO+	8.2	6.4	6.7
Penelec	7.9	13.7	9.6
Penn Power	9.0	15.1	10.4
PPL	5.6	11.6	12.2
UGI-Electric	2.8	8.2	14.4
West Penn	7.8	13.0	9.6
Industry Average*	7.2	8.0	7.2

* Does not include UGI-Electric.

+ PECO statistics include electric and gas.

Termination and Reconnection of Service

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

The following tables indicate the annual number of residential accounts each of the seven largest EDCs terminated and reconnected in 2021, 2022 and 2023. The first table also presents the termination rates for each of these utilities. The termination rate is the number of service terminations divided by the number of residential customers, expressed as a percent.

Residential Service Terminations/Termination Rates Major Electric Distribution Companies

Utility	Residential Service Terminations			Termination Rates		
	2021	2022	2023	2021	2022	2023
Duquesne	30,945	30,467	24,820	5.70	5.58	4.53
Met-Ed	26,941	28,816	26,672	5.26	5.59	5.15
PECO+	76,487	75,689	87,488	5.00	4.92	5.65
Penelec	20,354	20,488	19,379	4.06	4.09	3.87
Penn Power	2,416	3,244	4,006	1.63	2.18	2.68
PPL	30,843	35,241	17,915	2.47	2.81	1.42
UGI-Electric	1,493	1,607	1,450	2.71	2.92	2.63
West Penn	16,147	21,021	20,188	2.55	3.33	3.19
Total	205,626	216,573	201,918			
Industry Average*				3.99	4.18	3.88

* Does not include UGI-Electric.

+ PECO statistics include electric and gas.

Residential Service Reconnections Major Electric Distribution Companies

Utility	Residential Service Reconnections			Reconnection Rates		
	2021	2022	2023	2021	2022	2023
Duquesne	24,848	23,976	19,328	80.30	78.69	77.87
Met-Ed	23,842	25,389	23,202	88.50	88.11	86.99
PECO+	66,909	62,113	75,441	87.48	82.06	86.23
Penelec	16,094	16,268	15,328	79.07	79.40	79.10
Penn Power	1,844	2,473	3,154	76.32	76.23	78.73
PPL	22,309	24,378	11,439	72.33	69.18	63.85
UGI-Electric	1,143	1,218	1,045	76.56	75.79	72.07
West Penn	12,882	17,148	16,138	79.78	81.58	79.94
Total	169,871	172,963	165,075			
Industry Average*				82.66	79.89	81.82

* Does not include UGI-Electric.

+ PECO statistics include electric and gas.

Compliance

BCS provides utilities with written notice of alleged violations or infractions of the statutes and regulations found during BCS complaint handling. Utilities are provided an 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 2021 through 2023 as of July 25, 2024. 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 2023 complaints to the BCS.

The infraction rate is the number of informally verified infractions per 1,000 residential customers. Dividing per 1,000 customers normalizes the data for comparison purposes. The infraction rate is not a percentage. [Appendix B-1](#) provides a list of the infractions included in each infraction category.

Commission Infraction Rates Major Electric Distribution Companies

Utility	2021	2022	2023
Duquesne	0.23	0.24	0.17
Met-Ed	0.18	0.13	0.19
PECO+	0.08	0.10	0.14
Penelec	0.13	0.18	0.23
Penn Power	0.18	0.17	0.19
PPL	0.04	0.04	0.90
UGI-Electric	0.27	0.31	0.45
West Penn	0.09	0.14	0.15

+ PECO statistics include electric and gas.

2023 Number and Percent of Major Electric Distribution Company Infractions

Category	Duquesne	Met-Ed	PECO+	Penelec	Penn Power	PPL	UGI-Electric	West Penn	Electric Industry*
Billing and Payment	2	7	7	7	3	448	4	6	484
	2%	7%	3%	6%	11%	39%	16%	6%	11%
Meter Reading	1	0	1	0	0	4	1	2	9
	1%	0%	<1%	0%	0%	0%	4%	2%	1%
Make-Up Bills	0	1	3	5	0	107	0	8	124
	0%	1%	1%	4%	0%	9%	0%	9%	3%
Transfer of Accounts	1	2	1	0	0	1	0	1	6
	1%	2%	<1%	0%	0%	<1%	0%	1%	1%
Credit Standards and Deposits	24	11	100	22	10	3	10	11	191
	26%	11%	47%	19%	36%	<1%	40%	12%	24%
Termination Grounds	11	9	8	6	1	3	1	7	46
	12%	9%	4%	5%	4%	<1%	4%	7%	6%
Termination Procedures	10	3	11	2	2	3	1	7	39
	11%	3%	5%	2%	7%	<1%	4%	7%	5%
Reconnection of Service	16	30	30	40	11	2	2	21	152
	17%	31%	14%	35%	39%	<1%	8%	22%	21%
Liability – Responsibility for Bills	1	0	0	0	0	0	0	0	1
	1%	0%	0%	0%	0%	0%	0%	0%	<1%
Landlord / Ratepayer	1	0	2	2	0	0	0	0	5
	1%	0%	1%	2%	0%	0%	0%	0%	1%
Dispute Handling	14	27	34	23	1	121	4	17	241
	15%	28%	16%	20%	4%	11%	16%	18%	16%
Other	11	8	18	8	0	449	2	14	510
	12%	8%	8%	7%	0%	39%	8%	15%	12%
Total	92	98	215	115	28	1,141	25	94	1,808

* Electric Average does not include UGI-Electric.

+ PECO statistics include electric and gas.

Electric Industry Chapter Summary

The overall industry residential **Total Complaint Number** for the major EDCs increased from 19,093 in 2021 to 45,886 in 2023 (140.3% higher) but was slightly less than the pre-pandemic year of 2019. Likewise, the **Total Complaint Rate** increased from 3.68 in 2021 to 8.71 in 2023 but was still less than the 2019 rate.

The total number of **Consumer Complaints** from residential electric consumers increased from 5,056 in 2021 to 11,957 in 2023 (136.5% higher) and was significantly higher than the pre-pandemic year of 2019 with 7,680.

Billing disputes was the top **Consumer Complaint Category** for the major EDCs for 2023, which accounted for 29% of the total 3,050 Consumer Complaints evaluated. The EDC with the most billing disputes was PPL with 274, which was 57% of PPL's total evaluated Consumer Complaints.

The **Consumer Complaint Number** for the seven major EDCs increased by 165.8% from 3,984 in 2021 to 10,588 in 2023. Likewise, the **Consumer Complaint Rate** increased from 0.85 in 2021 to 1.78 in 2023. The substantial increase was largely driven by the billing issues at PPL in 2023, which resulted in a 942.8% increase from 566 consumer complaints for PPL in 2021 to 5,902 in 2023.

From 2021 to 2023, the **Justified Consumer Complaint Rates** for PECO, Penn Power, PPL and West Penn increased, the rate for UGI-Electric remained stable, and the rates decreased for Duquesne, Met-Ed and Penelec. PPL's justified rate of 1.67 was significantly higher than the industry average rate of 0.30. The industry average for the **Percent of Justified Consumer Complaints** rose from 8.1% in 2021 to 22.5% in 2023.

Penelec and Penn Power had the shortest **Consumer Complaint Response Times** in 2023, taking 14.9 days to respond, while UGI-Electric and PPL took the most time to respond, with 19.6 and 17.2 days, respectively.

The total number of **PARs** from residential electric consumers increased from 11,028 in 2021 to 26,950 in 2023 (144.4% higher) but was a little less than the pre-pandemic year of 2019 with 29,907.

The **PAR Number** for the major EDCs increased by 142.6% from 10,784 in 2021 to 26,157 in 2023. Likewise, the **PAR Rate** increased from 2.30 in 2021 to 5.50 in 2023.

From 2021 to 2023, the **Justified PAR Rate** for UGI-Electric increased, Penelec's justified PAR rate remained stable, and the justified PAR rates for Duquesne, Met-Ed, PECO, Penn Power, PPL and West Penn decreased. The 2023 justified PAR rates for Penelec (0.30), Penn Power (0.31) and UGI-Electric (0.54) were higher than the 2023 industry average rate of 0.21 for the major EDCs. The industry average for the **Percent of Justified PARs** dropped from 14.3% in 2021 to 3.6% in 2023.

There was a wide range of **PAR Response Times** among the major EDCs in 2023, from a low of 6.7 days for PECO to a high of 14.4 days for UGI-Electric.

Overall, both the number of residential service **Terminations** and **Reconnections** decreased from 2021 compared to 2023, by -1.8% and -2.8%, respectively. These decreases were partially driven by PPL pausing terminations until the billing issues that occurred in 2023 were resolved; it resulted in a 41.9% decrease in terminations, from 30,843 in 2021 to 17,915 in 2023, and a subsequent 48.7% decrease in reconnections, from 22,309 in 2021 to 11,439 in 2023.

The industry average for the **Infraction Categories** of Credit Standards and Deposits (24%) and Reconnection of Service (21%) had the highest percentages in 2023. The major EDC with the most Credit Standards and Deposits infractions was PECO with 100, which was 47% of PECO's infractions.

6. Natural Gas Industry

In 2023, the Commission had jurisdiction over 21 natural gas distribution companies (NGDCs). The majority of Consumer Complaints and PARs are about the five major NGDCs: Columbia Gas of Pennsylvania Inc. (**Columbia**), National Fuel Gas Distribution Corp. (**NFG**), Peoples Natural Gas Co. (**Peoples**), Philadelphia Gas Works (**PGW**), and UGI Gas f/k/a UGI South (**UGI Gas**). This chapter will focus exclusively on those five utilities. See the [Non-Major Utilities](#) chapter for complaints regarding the non-major natural gas companies.

The statistics in the tables on the pages that follow depict the performance of each of the five major gas utilities in 2023. The major gas utilities are those that have more than 100,000 residential customers.

Total Complaint Numbers and Rates

The following table shows the total number of all complaints; Consumer Complaints, PARs, and Inquiries combined. The total complaint rate is the total number of complaints per 1,000 residential customers.

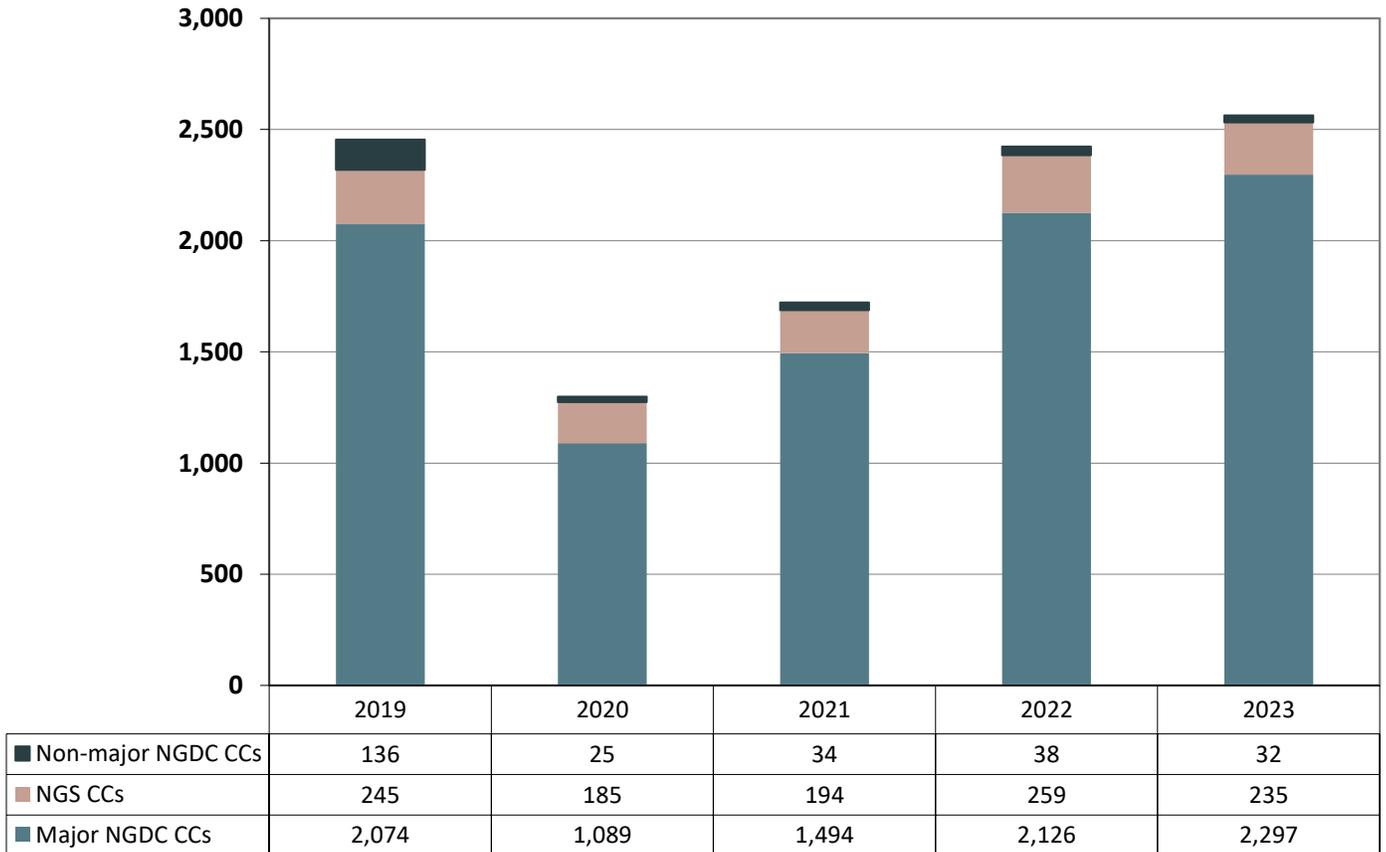
2021-23 Residential Total Complaint Numbers/Rates Major Natural Gas Distribution Companies

Utility	2021		2022		2023	
	Number	Rate	Number	Rate	Number	Rate
Columbia	639	1.57	1,004	2.45	1,070	2.60
NFG	355	1.79	522	2.65	639	3.25
Peoples	1,344	2.27	1,634	2.75	1,788	3.01
PGW	3,951	8.08	6,410	13.15	8,174	16.90
UGI Gas	1,645	2.69	4,542	7.34	5,892	9.43
Total	7,934		14,112		17,563	
Industry Average		3.45		6.12		7.60

Consumer Complaints

During 2023, BCS handled 2,564 Consumer Complaints from residential natural gas customers of the various NGDCs (2,329) and natural gas suppliers (NGSs) (235). The five major NGDCs represented 90% (2,297) of the total Consumer Complaints.

Residential Consumer Complaints (CCs) - Gas



Consumer Complaint Categories

The following table shows the number and percentage of 2023 complaints in each of the 14 categories used by BCS policy analysts for compliance evaluation. These categories are based on all evaluated residential complaints filed with BCS in 2023 and evaluated by BCS as of April 12, 2024. See [Appendix C-1](#) for an explanation of the categories.

Number and Percent of Consumer Complaints by Dispute Category
2023 Complaints Evaluated
Major Natural Gas Distribution Companies

Category	Columbia	NFG	Peoples	PGW	UGI Gas	Gas Industry
Billing Disputes	53	18	39	155	120	385
	39%	31%	15%	32%	28%	28%
Termination or PAR Procedures	17	7	35	87	52	198
	13%	12%	13%	18%	12%	15%
Personnel Problems	13	5	44	22	30	114
	10%	9%	17%	5%	7%	8%
Discontinuance / Transfer	3	4	14	57	24	102
	2%	7%	5%	12%	6%	7%
Damages	12	3	44	13	21	93
	9%	5%	17%	3%	5%	7%
Credit and Deposits	2	4	11	28	30	75
	1%	7%	4%	6%	7%	6%
Other Payment Issues	3	2	11	34	13	63
	2%	3%	4%	7%	3%	5%
Service Quality	5	1	24	12	8	50
	4%	2%	9%	3%	2%	4%
Metering	2	5	3	21	12	43
	1%	9%	1%	4%	3%	3%
Scheduling Delays	2	0	6	7	15	30
	1%	0%	2%	1%	3%	2%
Rates	4	0	0	0	14	18
	3%	0%	0%	0%	3%	1%
Service Extensions	1	1	1	0	2	5
	1%	2%	<1%	0%	<1%	<1%
Service Interruptions	0	0	2	2	0	4
	0%	0%	1%	<1%	0%	<1%
All Other Problems	19	8	26	39	91	183
	14%	14%	10%	8%	21%	13%
Total	136	58	260	477	432	1,363

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

The following tables show the Consumer Complaint Rate, the Justified Consumer Complaint Rate, and the Percent of Justified Consumer Complaints for each major NGDC in 2021, 2022 and 2023. A complaint is considered “justified” if it is found that the utility did not comply with Commission Orders, policies, regulations, reports, Secretarial Letters, or tariffs. BCS evaluates a statistically valid sampling of complaints for each utility.

The Consumer Complaint rate is the number of Consumer Complaints per 1,000 residential customers. The justified Consumer Complaint numbers are estimated based on the number of Consumer Complaints when BCS closes the dataset for analyses, after all of the internal processes involving the evaluation and analysis of the data have occurred: 2021 as of Sept. 10, 2022; 2022 as of May 5, 2023; and 2023 as of April 12, 2024. The date varies each year, due to multiple factors that can impact the investigation and closure of cases and/or the evaluation of the statistically valid sampling of cases for each utility and/or the analysis of the data (e.g., caseload fluctuations, staffing fluctuations/changes, systemic issues, etc.). The justified Consumer Complaint rate is the estimated number of justified Consumer Complaints per 1,000 residential customers based on a statistically valid sampling of complaints. The justified Consumer Complaint rate is a normalized ratio useful for comparing utility performance among the various utility companies. It is not a percentage.

The 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.

2023 Residential Consumer Complaint Rates, Justified Consumer Complaint Rates, and Percent of Justified Consumer Complaints Major Natural Gas Distribution Companies

Utility	Consumer Complaint Rate	Justified Consumer Complaint Rate	Percent of Justified Consumer Complaints
Columbia	0.49	0.02	3.4%
NFG	0.42	0.06	13.3%
Peoples	0.58	0.02	3.8%
PGW	2.32	0.39	17.0%
UGI Gas	0.87	0.07	8.3%
Industry Average	0.94	0.11	11.6%

**2021-23 Residential Consumer Complaint Numbers/Rates
Major Natural Gas Distribution Companies**

Utility	2021		2022		2023	
	Number	Rate	Number	Rate	Number	Rate
Columbia	122	0.30	168	0.41	203	0.49
NFG	74	0.37	66	0.34	83	0.42
Peoples	374	0.63	344	0.58	346	0.58
PGW	628	1.28	1,095	2.25	1,120	2.32
UGI Gas	296	0.48	453	0.73	545	0.87
Total	1,494		2,126		2,297	
Industry Average		0.61		0.86		0.94

**2021-23 Justified Residential Consumer Complaint Numbers/Rates
Major Natural Gas Distribution Companies**

Utility	2021		2022		2023	
	Number	Rate	Number	Rate	Number	Rate
Columbia	7	0.02	1	0.00	7	0.02
NFG	5	0.03	8	0.04	11	0.06
Peoples	12	0.02	13	0.02	13	0.02
PGW	150	0.31	227	0.47	190	0.39
UGI Gas	40	0.07	42	0.07	45	0.07
Total	214		291		266	
Industry Average		0.09		0.12		0.11

**2021-23 Number/Percent of Justified Residential Consumer Complaints
Major Natural Gas Distribution Companies**

Utility	2021		2022		2023	
	Number	Percent	Number	Percent	Number	Percent
Columbia	7	5.7%	1	0.6%	7	3.4%
NFG	5	6.8%	8	12.1%	11	13.3%
Peoples	12	3.2%	13	3.8%	13	3.8%
PGW	150	23.9%	227	20.7%	190	17.0%
UGI Gas	40	13.5%	42	9.3%	45	8.3%
Total	214		291		266	
Industry Average		14.3%		13.7%		11.6%

Consumer Complaint Response Time

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

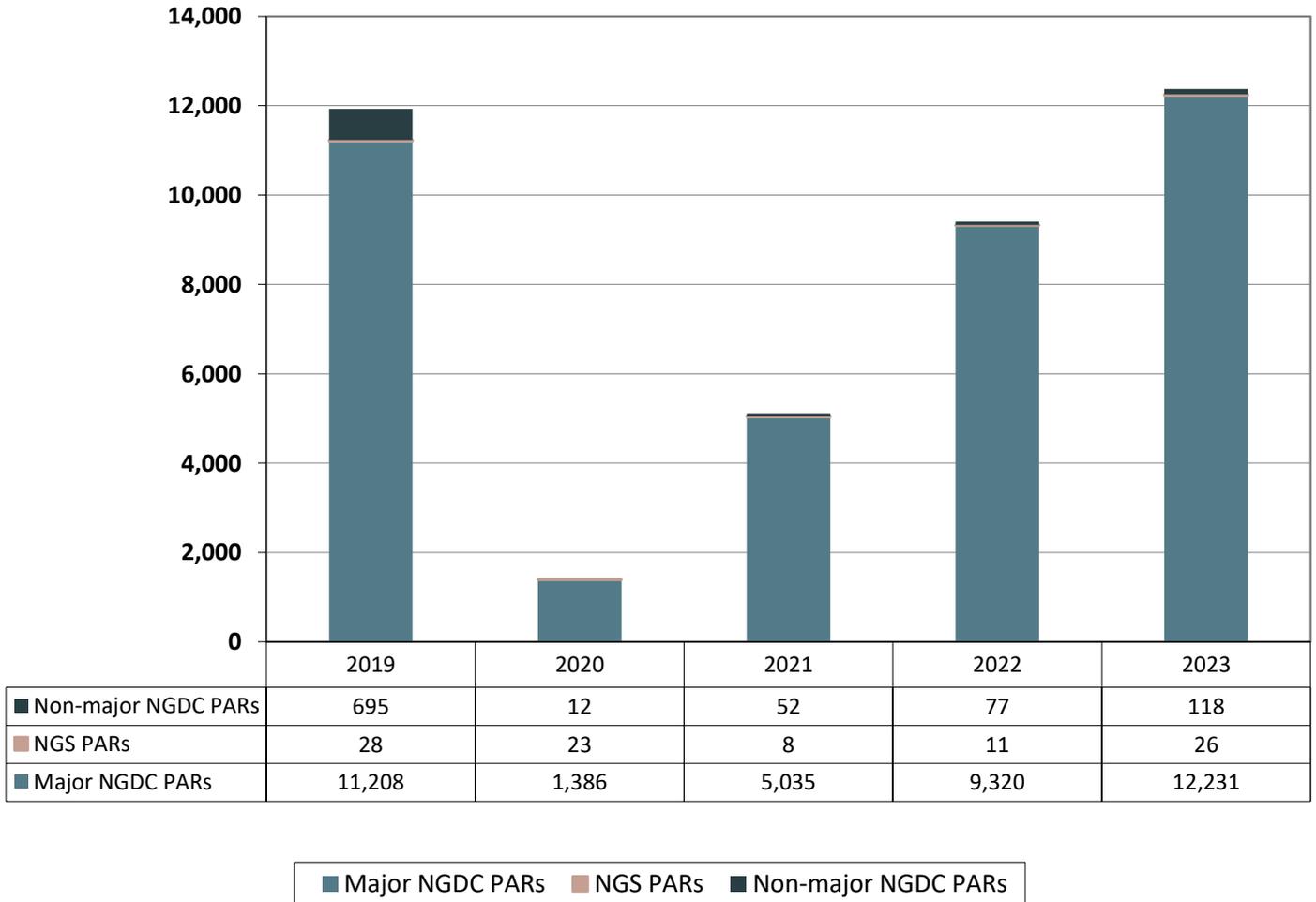
**2021-23 Average Response Time to BCS
Residential Consumer Complaints
Major Natural Gas Distribution Companies**

Utility	Number of Days		
	2021	2022	2023
Columbia	10.3	8.2	6.2
NFG	13.6	16.9	16.7
Peoples	4.8	4.6	5.3
PGW	21.2	19.8	18.4
UGI Gas	7.6	10.7	15.4
Industry Average	13.0	14.2	14.7

Payment Arrangement Requests

During 2023, BCS handled 12,375 PARs from residential natural gas customers of the various NGDCs (12,349) and NGSs (26). The five major NGDCs represented 99% (12,231) of the total PARs.

Residential PARs - Gas



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

The following tables show the PAR Rate, the Justified PAR Rate, and the Percent of Justified PARs for each major NGDC in 2021, 2022 and 2023. A complaint is considered “justified” if it is found that the utility did not comply with Commission Orders, policies, regulations, reports, Secretarial Letters, or tariffs. BCS evaluates a statistically valid sampling of complaints for each utility.

The PAR rate is the number of PARs per 1,000 residential customers. The justified PAR numbers are estimated based on the number of PARs when BCS closes the dataset for analyses, after all of the internal processes involving the evaluation and analysis of the data have occurred: 2021 as of Sept. 10, 2022; 2022 as of May 5, 2023; and 2023 as of April 12, 2024. The date varies each year, due to multiple factors that can impact the investigation and closure of cases and/or the evaluation of the statistically valid sampling of cases for each utility and/or the analysis of the data (e.g., caseload fluctuations, staffing fluctuations/changes, systemic issues, etc.). The justified PAR rate is the estimated number of justified PARs per 1,000 residential customers based on a statistically valid sampling of complaints. It is not a percentage. The justified rate is a normalized ratio useful for comparing utility performance among the various companies.

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

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

Utility	PAR Rate	Justified PAR Rate	Percent of Justified PARs
Columbia	1.47	0.06	4.3%
NFG	2.23	0.12	5.5%
Peoples	1.93	0.06	3.2%
PGW	11.65	0.61	5.2%
UGI Gas	7.05	0.13	1.9%
Industry Average	4.87	0.20	3.8%

**2021-23 Residential Payment Arrangement Request (PAR) Numbers/Rates
Major Natural Gas Distribution Companies**

Utility	2021		2022		2023	
	Number	Rate	Number	Rate	Number	Rate
Columbia	338	0.83	552	1.35	604	1.47
NFG	219	1.11	353	1.79	438	2.23
Peoples	769	1.30	1,018	1.71	1,145	1.93
PGW	2,676	5.47	4,001	8.21	5,636	11.65
UGI Gas	1,033	1.69	3,396	5.49	4,408	7.05
Total	5,035		9,320		12,231	
Industry Average		2.08		3.71		4.87

**2021-23 Justified Residential Payment Arrangement Request (PAR) Numbers/Rates
Major Natural Gas Distribution Companies**

Utility	2021		2022		2023	
	Number	Rate	Number	Rate	Number	Rate
Columbia	13	0.03	17	0.04	26	0.06
NFG	43	0.22	13	0.07	24	0.12
Peoples	50	0.08	15	0.03	37	0.06
PGW	270	0.55	699	1.43	294	0.61
UGI Gas	68	0.11	86	0.14	83	0.13
Total	444		830		464	
Industry Average		0.20		0.34		0.20

**2021-23 Number/Percent of Justified Residential Payment Arrangement Requests (PARs)
Major Natural Gas Distribution Companies**

Utility	2021		2022		2023	
	Number	Percent	Number	Percent	Number	Percent
Columbia	13	3.8%	17	3.1%	26	4.3%
NFG	43	19.6%	13	3.7%	24	5.5%
Peoples	50	6.5%	15	1.5%	37	3.2%
PGW	270	10.1%	699	17.5%	294	5.2%
UGI Gas	68	6.6%	86	2.5%	83	1.9%
Total	444		830		464	
Industry Average		8.8%		8.9%		3.8%

PAR Response Time

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

**2021-23 Average Response Time to BCS
Residential Payment Arrangement Requests (PARs)
Major Natural Gas Distribution Companies**

Utility	Number of Days		
	2021	2022	2023
Columbia	6.3	3.0	2.8
NFG	6.7	7.6	7.6
Peoples	2.4	2.4	2.7
PGW	15.5	14.4	12.9
UGI Gas	2.5	5.6	8.8
Industry Average	10.4	7.7	7.7

Termination and Reconnection of Service

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

The following tables indicate the annual number of residential accounts each of the five largest NGDCs terminated and reconnected in 2021, 2022 and 2023. The first table also presents the termination rates for each of these utilities. The termination rate is the number of service terminations divided by the number of residential customers, expressed as a percent.

Residential Service Terminations/Termination Rates Major Natural Gas Distribution Companies

Utility	Residential Service Terminations			Termination Rates		
	2021	2022	2023	2021	2022	2023
Columbia	9,760	11,380	10,454	2.39	2.78	2.54
NFG	7,091	6,861	6,981	3.58	3.49	3.55
Peoples	23,754	15,335	21,462	4.01	2.58	3.61
PGW	15,669	14,410	34,682	3.21	2.96	7.17
UGI Gas	23,013	26,882	31,066	3.76	4.35	4.97
Total	79,287	74,868	104,645			
Industry Average				3.45	3.25	4.53

Residential Service Reconnections Major Natural Gas Distribution Companies

Utility	Residential Service Reconnections			Reconnection Rates		
	2021	2022	2023	2021	2022	2023
Columbia	5,503	6,760	5,703	56.38	59.40	54.55
NFG	5,095	5,003	5,138	71.85	72.92	73.60
Peoples	18,349	11,840	17,558	77.25	77.21	81.81
PGW	10,567	9,716	24,000	67.44	67.43	69.20
UGI Gas	17,239	19,924	22,823	74.91	74.12	73.47
Total	56,753	53,243	75,222			
Industry Average				71.58	71.12	71.88

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 an 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 2021 through 2023 as of July 25, 2024. 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 2023 complaints to the BCS.

The infraction rate is the number of informally verified infractions per 1,000 residential customers. Dividing per 1,000 customers normalizes the data for comparison purposes. The infraction rate is not a percentage. [Appendix B-1](#) provides a list of the infractions included in each infraction category.

Commission Infraction Rates Major Natural Gas Distribution Companies

Utility	2021	2022	2023
Columbia	0.03	0.02	0.04
NFG	0.16	0.11	0.13
Peoples	0.06	0.02	0.06
PGW	0.47	0.83	0.83
UGI Gas	0.13	0.18	0.33

2023 Number and Percent of Major Natural Gas Distribution Company Infractions

Category	Columbia	NFG	Peoples	PGW	UGI Gas	Gas Industry
Billing and Payment	1	0	2	20	5	28
	7%	0%	6%	5%	2%	4%
Meter Reading	0	6	0	3	1	10
	0%	24%	0%	1%	<1%	5%
Make-Up Bills	1	3	0	11	1	16
	7%	12%	0%	3%	<1%	4%
Transfer of Accounts	0	0	0	7	2	9
	0%	0%	0%	2%	1%	1%
Credit Standards and Deposits	8	6	17	120	109	260
	53%	24%	52%	30%	53%	42%
Termination Grounds	0	1	3	21	19	44
	0%	4%	9%	5%	9%	5%
Termination Procedures	1	0	2	37	10	50
	7%	0%	6%	9%	5%	5%
Reconnection of Service	1	7	5	52	33	98
	7%	28%	15%	13%	16%	16%
Liability – Responsibility for Bills	0	0	2	2	0	4
	0%	0%	6%	<1%	0%	1%
Landlord / Ratepayer	0	0	0	4	2	6
	0%	0%	0%	1%	1%	<1%
Dispute Handling	3	1	1	93	16	114
	20%	4%	3%	23%	8%	12%
Other	0	1	1	32	6	40
	0%	4%	3%	8%	3%	4%
Total	15	25	33	402	204	679

Natural Gas Industry Chapter Summary

The overall industry residential **Total Complaint Number** for the major NGDCs increased from 7,934 in 2021 to 17,563 in 2023 (121.4% higher) but was slightly higher than the pre-pandemic year of 2019. Likewise, the **Total Complaint Rate** increased from 3.45 in 2021 to 7.60 in 2023 but was a little less than the 2019 rate.

The total number of **Consumer Complaints** from residential gas consumers increased from 1,722 in 2021 to 2,564 in 2023 (48.9% higher) and was slightly higher the pre-pandemic year of 2019 with 2,455.

Billing disputes was the top **Consumer Complaint Category** for the major NGDCs for 2023, which accounted for 28% of the total 1,363 Consumer Complaints evaluated. The NGDC with the most billing disputes was PGW with 155, which was 32% of PGW's total evaluated Consumer Complaints.

The **Consumer Complaint Number** for the major NGDCs increased by 53.7% from 1,494 in 2021 to 2,297 in 2023. Likewise, the **Consumer Complaint Rate** increased from 0.61 in 2021 to 0.94 in 2023.

From 2021 to 2023, the **Justified Consumer Complaint Rates** for NFG and PGW increased, while the rates remained stable for Columbia, Peoples and UGI Gas. PGW's justified rate of 0.39 was higher than the industry average rate of 0.11. The industry average for the **Percent of Justified Consumer Complaints** decreased from 14.3% in 2021 to 11.6% in 2023.

Peoples had the shortest **Consumer Complaint Response Time** in 2023, taking 5.3 days to respond, while PGW took the most time to respond, with 18.4 days.

The total number of **PARs** from residential natural gas consumers increased from 5,095 in 2021 to 12,375 in 2023 (142.9% higher) and was slightly higher than the pre-pandemic year of 2019 with 11,931.

The **PAR Number** for the major NGDCs increased by 142.9% from 5,035 in 2021 to 12,231 in 2023. Likewise, the **PAR Rate** increased from 2.08 in 2021 to 4.87 in 2023.

From 2021 to 2023, the **Justified PAR Rates** for Columbia, PGW and UGI Gas increased, while the justified PAR rates for NFG and Peoples decreased. The 2023 justified PAR rate for PGW of 0.61 was greater than the 2023 industry average rate of 0.20. The industry average for the **Percent of Justified PARs** dropped from 8.8% in 2021 to 3.8% in 2023.

There was a wide range of **PAR Response Times** among the major NGDCs in 2023, from a low of 2.7 days for Peoples to a high of 12.9 days for PGW.

Overall, both the number of residential service **Terminations** and **Reconnections** increased from 2021 compared to 2023, by 32.0% and 32.5%, respectively.

The industry average for the **Infraction Category** of Credit Standards and Deposits (42%) had the highest percentage in 2023. The NGDC with the most Credit Standards and Deposits infractions was PGW with 120, which was 30% of PGW's total infractions.

7. Water Industry

In 2023, 70 water utilities were regulated by the PUC. Tables in this chapter present Consumer Complaint and PAR information. The water utilities are categorized into three groupings based on the amount of the utility's annual revenue, including Class A water utilities, Class B water utilities, and Class C water utilities. Some municipal water utilities are subject to PUC regulation because they operate beyond their municipal boundary; however, the data for municipal water utilities is not included in this report.

Class A water utilities generate annual revenues of \$1 million or more for three consecutive years. In 2023, 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 (**Veolia Bethel**)
- Veolia Water PA (**Veolia PA**)
- York Water Co. (**York**)

The number of residential customers served by these utilities in 2023 ranged from 2,453 residential customers for Veolia Water Bethel to 649,956 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).

On July 19, 2023, at Docket No. [A-2022-3035967](#), et al., the Commission approved the merger of Veolia Water's separate Veolia PA and Veolia Bethel rate districts into a single rate district known as Veolia Water Pennsylvania, Inc., effective June 30, 2023. Therefore, the 2023 complaint data for Veolia Bethel is through June 30, 2023, and the Veolia PA complaint data includes Veolia Bethel as of July 1, 2023. However, the termination and reconnection data for Veolia Bethel was reported separately through Dec. 31, 2023. The termination and reconnection data for Veolia PA did not include Veolia Bethel until Jan. 1, 2024.

Compared to Class A water utilities, Class B and Class C water utilities have lower annual revenues and typically fewer residential customers. See the [Non-Major Utilities](#) chapter for complaints regarding the non-major water companies.

In 2023, seven Class B utilities were operating in Pennsylvania. These utilities had annual revenues between \$200,000 and \$999,999 and served 311 to 1,348 residential customers.

In 2023, there were 32 Class C utilities. The annual revenue for these utilities was less than \$200,000 and they served customers ranging from one to 558.

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

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

Most water-related 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 2023.

Total Complaint Numbers and Rates

The following table shows the total number of all complaints; Consumer Complaints, PARs, and Inquiries combined. The total complaint rate is the total number of complaints per 1,000 residential customers.

2021-23 Residential Total Complaint Numbers/Rates Major Class A Water Utilities

Utility	2021		2022		2023	
	Number	Rate	Number	Rate	Number	Rate
Aqua	823	2.01	945	2.29	933	2.25
PAWC	2,459	3.89	2,711	4.22	3,423	5.27
Large Class A Total	3,282		3,656		4,356	
Large Class A Average		3.15		3.46		4.09
Audubon	7	2.61	6	2.23	4	1.51
Columbia	7	0.71	12	1.10	9	0.79
Community Utilities	21	7.93	22	8.30	33	12.42
Newtown Artesian	3	0.31	4	0.41	1	0.10
Veolia Bethel+	0	0.00	1	0.41	1	0.41
Veolia PA+	88	1.51	76	1.29	84	1.41
York	44	0.69	106	1.58	134	2.06
“Other Class A” Total	170		227		266	
“Other Class A” Average		1.14		1.47		1.74
All Class A Total	3,452		3,883		4,622	
All Class A Industry Average		2.90		3.21		3.79

+ The Veolia PA data includes Veolia Bethel as of July 1, 2023, due to the Veolia Water merger.

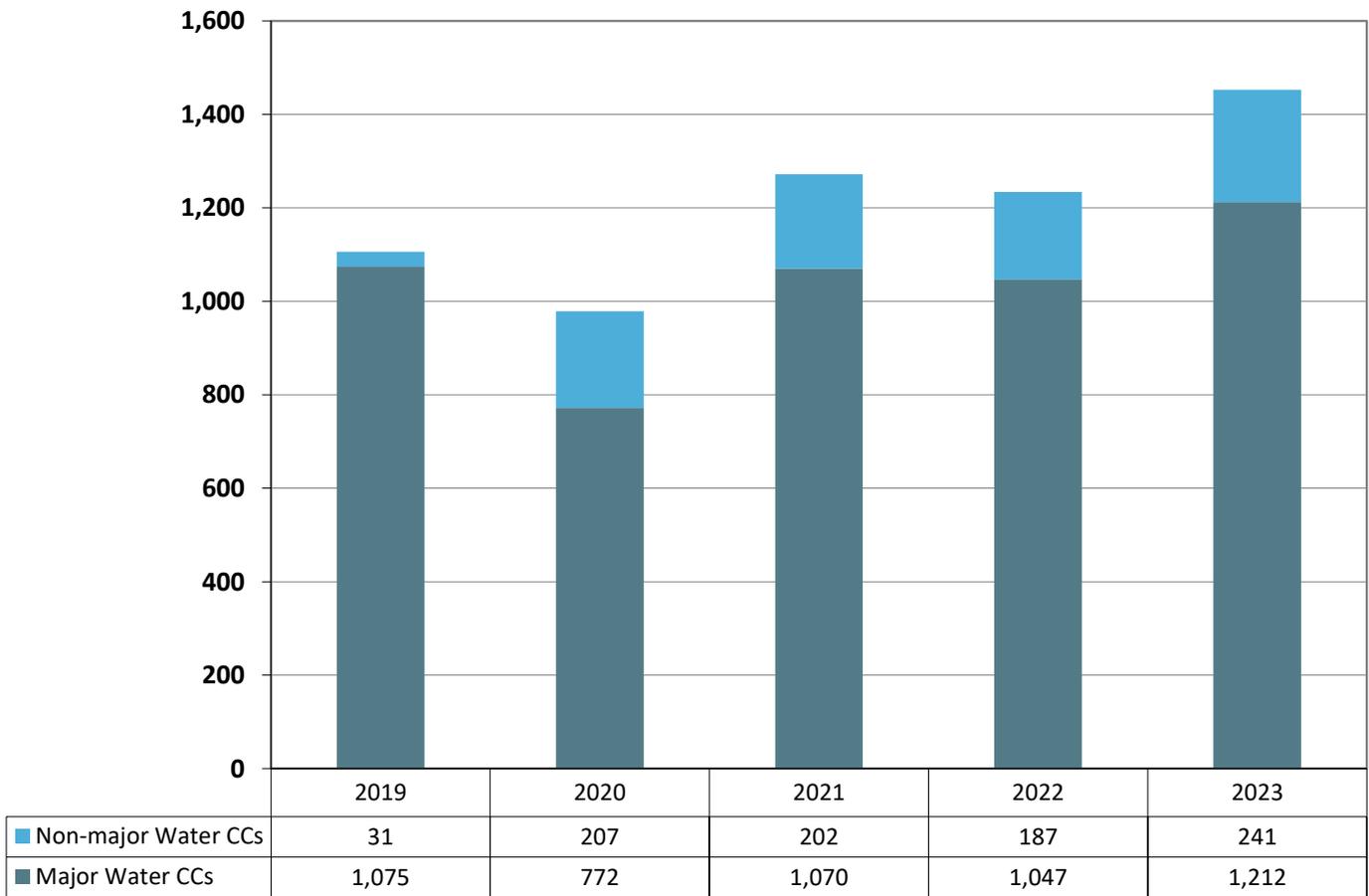
Consumer Complaints

During 2023, BCS handled a total of 1,453 Consumer Complaints from residential customers of the various water utilities. The major Class A water utilities represented 83% (1,212) of the total Consumer Complaints.

While a majority of Consumer Complaints involved the Class A water utilities in 2023, 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 2023, BCS handled 15 complaints for small water utilities, with 53% (8 complaints) involving billing disputes.

Residential Consumer Complaints (CCs) - Water



■ Major Water CCs ■ Non-major Water CCs

Consumer Complaint Categories

The following table shows the number and percentage of 2023 complaints in each of the 14 categories used by BCS policy analysts for compliance evaluation. These categories are based on all evaluated residential complaints filed with BCS in 2023 and evaluated by BCS as of April 12, 2024. See [Appendix C-1](#) for an explanation of the categories.

Number and Percent of Consumer Complaints by Dispute Category
2023 Complaints Evaluated
Major Class A Water Utilities

Category	Aqua	PAWC	Large Class A Avg	Audubon	Columbia	Community Utilities	Newtown Artesian	Veolia Bethel+	Veolia PA+	York	"Other Class A" Avg	All Class A Water
Billing Disputes	106	178	284	1	0	4	0	0	6	10	21	305
	51%	40%	44%	100%	0%	57%	0%	0%	27%	37%	36%	43%
Metering	26	76	102	0	0	0	0	0	8	2	10	112
	13%	17%	16%	0%	0%	0%	0%	0%	36%	7%	17%	16%
Termination or PAR Procedures	33	45	78	0	0	1	0	0	2	3	6	84
	16%	10%	12%	0%	0%	14%	0%	0%	9%	11%	10%	12%
Rates	5	36	41	0	1	0	0	0	0	7	8	49
	2%	8%	6%	0%	50%	0%	0%	0%	0%	26%	14%	7%
Service Quality	9	25	34	0	1	1	0	0	4	3	9	43
	4%	6%	5%	0%	50%	14%	0%	0%	18%	11%	15%	6%
Damages	5	26	31	0	0	0	0	0	1	0	1	32
	2%	6%	5%	0%	0%	0%	0%	0%	5%	0%	2%	5%
Discontinuance / Transfer	6	12	18	0	0	0	0	0	0	0	0	18
	3%	3%	3%	0%	0%	0%	0%	0%	0%	0%	0%	3%
Credit and Deposits	5	9	14	0	0	0	0	0	0	0	0	14
	2%	2%	2%	0%	0%	0%	0%	0%	0%	0%	0%	2%
Other Payment Issues	7	5	12	0	0	0	0	0	1	0	1	13
	3%	1%	2%	0%	0%	0%	0%	0%	5%	0%	2%	2%
Personnel Problems	2	5	7	0	0	0	0	0	0	1	1	8
	1%	1%	1%	0%	0%	0%	0%	0%	0%	4%	2%	1%
Service Extensions	1	6	7	0	0	0	0	0	0	0	0	7
	<1%	1%	1%	0%	0%	0%	0%	0%	0%	0%	0%	1%
Scheduling Delays	0	3	3	0	0	1	0	0	0	1	2	5
	0%	1%	<1%	0%	0%	14%	0%	0%	0%	4%	3%	1%
Service Interruptions	0	4	4	0	0	0	0	0	0	0	0	4
	0%	1%	1%	0%	0%	0%	0%	0%	0%	0%	0%	1%
All Other Problems	1	14	15	0	0	0	0	0	0	0	0	15
	<1%	3%	2%	0%	0%	0%	0%	0%	0%	0%	0%	2%
Total	206	444	650	1	2	7	0	0	22	27	59	709

+ The Veolia PA data includes Veolia Bethel as of July 1, 2023, due to the Veolia Water merger.

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

The following tables show the Consumer Complaint Rate, the Justified Consumer Complaint Rate, and the Percent of Justified Consumer Complaints for each Class A water utility in 2021, 2022 and 2023. A complaint is considered “justified” if it is found that the utility did not comply with Commission Orders, policies, regulations, reports, Secretarial Letters, or tariffs. BCS evaluates a statistically valid sampling of complaints for each utility.

The Consumer Complaint rate is the number of Consumer Complaints per 1,000 residential customers. The justified Consumer Complaint numbers are estimated based on the number of Consumer Complaints when BCS closes the dataset for analyses, after all of the internal processes involving the evaluation and analysis of the data have occurred: 2021 as of Sept. 10, 2022; 2022 as of May 5, 2023; and 2023 as of April 12, 2024. The date varies each year, due to multiple factors that can impact the investigation and closure of cases and/or the evaluation of the statistically valid sampling of cases for each utility and/or the analysis of the data (e.g., caseload fluctuations, staffing fluctuations/changes, systemic issues, etc.). The justified Consumer Complaint rate is the estimated number of justified Consumer Complaints per 1,000 residential customers based on a statistically valid sampling of complaints. The justified Consumer Complaint rate is a normalized ratio useful for comparing utility performance among the various utility companies. It is not a percentage.

The 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.

**2023 Residential Consumer Complaint Rates,
Justified Consumer Complaint Rates, and Percent of Justified Consumer Complaints
Major Class A Water Utilities**

Utility	Consumer Complaint Rate	Justified Consumer Complaint Rate	Percent of Justified Consumer Complaints
Aqua	0.62	0.20	32.0%
PAWC	1.37	0.25	18.5%
Large Class A Average	0.99	0.23	21.5%
Audubon	0.38	0.00	0.0%
Columbia	0.17	0.00	0.0%
Community Utilities	2.63	0.38	14.3%
Newtown Artesian	0.00	0.00	0.0%
Veolia Bethel+	0.41	0.00	0.0%
Veolia PA+	0.40	0.07	16.7%
York	0.46	0.03	6.7%
“Other Class A” Average	0.42	0.05	10.8%
All Class A Industry Average	0.80	0.17	21.0%

+ The Veolia PA data includes Veolia Bethel as of July 1, 2023, due to the Veolia Water merger.

**2021-23 Residential Consumer Complaint Numbers/Rates
Major Class A Water Utilities**

Utility	2021		2022		2023	
	Number	Rate	Number	Rate	Number	Rate
Aqua	290	0.71	300	0.73	259	0.62
PAWC	723	1.14	681	1.06	888	1.37
Large Class A Total	1,013		981		1,147	
Large Class A Average		0.93		0.89		0.99
Audubon	5	1.86	3	1.11	1	0.38
Columbia	1	0.10	5	0.46	2	0.17
Community Utilities	0	0.00	10	3.77	7	2.63
Newtown Artesian	2	0.21	2	0.21	0	0.00
Veolia Bethel+	0	0.00	1	0.41	1	0.41
Veolia PA+	38	0.65	24	0.41	24	0.40
York	11	0.17	21	0.31	30	0.46
“Other Class A” Total	57		66		65	
“Other Class A” Average		0.38		0.43		0.42
All Class A Total	1,070		1,047		1,212	
All Class A Industry Average		0.74		0.74		0.80

+ The Veolia PA data includes Veolia Bethel as of July 1, 2023, due to the Veolia Water merger.

**2021-23 Justified Residential Consumer Complaint Numbers/Rates
Major Class A Water Utilities**

Utility	2021		2022		2023	
	Number	Rate	Number	Rate	Number	Rate
Aqua	40	0.10	61	0.15	83	0.20
PAWC	73	0.12	171	0.27	164	0.25
Large Class A Total	113		232		247	
Large Class A Average		0.11		0.21		0.23
Audubon	0	0.00	1	0.37	0	0.00
Columbia	0	0.00	3	0.28	0	0.00
Community Utilities	0	0.00	0	0.00	1	0.38
Newtown Artesian	0	0.00	0	0.00	0	0.00
Veolia Bethel+	0	0.00	0	0.00	0	0.00
Veolia PA+	7	0.12	4	0.07	4	0.07
York	0	0.00	1	0.01	2	0.03
“Other Class A” Total	7		9		7	
“Other Class A” Average		0.05		0.06		0.05
All Class A Total	120		241		254	
All Class A Industry Average		0.09		0.16		0.17

+ The Veolia PA data includes Veolia Bethel as of July 1, 2023, due to the Veolia Water merger.

**2021-23 Number/Percent of Justified Residential Consumer Complaints
Major Class A Water Utilities**

Utility	2021		2022		2023	
	Number	Percent	Number	Percent	Number	Percent
Aqua	40	13.8%	61	20.3%	83	32.0%
PAWC	73	10.1%	171	25.1%	164	18.5%
Large Class A Total	113		232		247	
Large Class A Average		11.2%		23.6%		21.5%
Audubon	0	0.0%	1	33.3%	0	0.0%
Columbia	0	0.0%	3	60.0%	0	0.0%
Community Utilities	0	0.0%	0	0.0%	1	14.3%
Newtown Artesian	0	0.0%	0	0.0%	0	0.0%
Veolia Bethel+	0	0.0%	0	0.0%	0	0.0%
Veolia PA+	7	18.4%	4	16.7%	4	16.7%
York	0	0.0%	1	4.8%	2	6.7%
“Other Class A” Total	7		9		7	
“Other Class A” Average		12.3%		13.6%		10.8%
All Class A Total	120		241		254	
All Class A Industry Average		11.2%		23.0%		21.0%

+ The Veolia PA data includes Veolia Bethel as of July 1, 2023, due to the Veolia Water merger.

Consumer Complaint Response Time

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

2021-23 Average Response Time to BCS Residential Consumer Complaints Major Class A Water Utilities

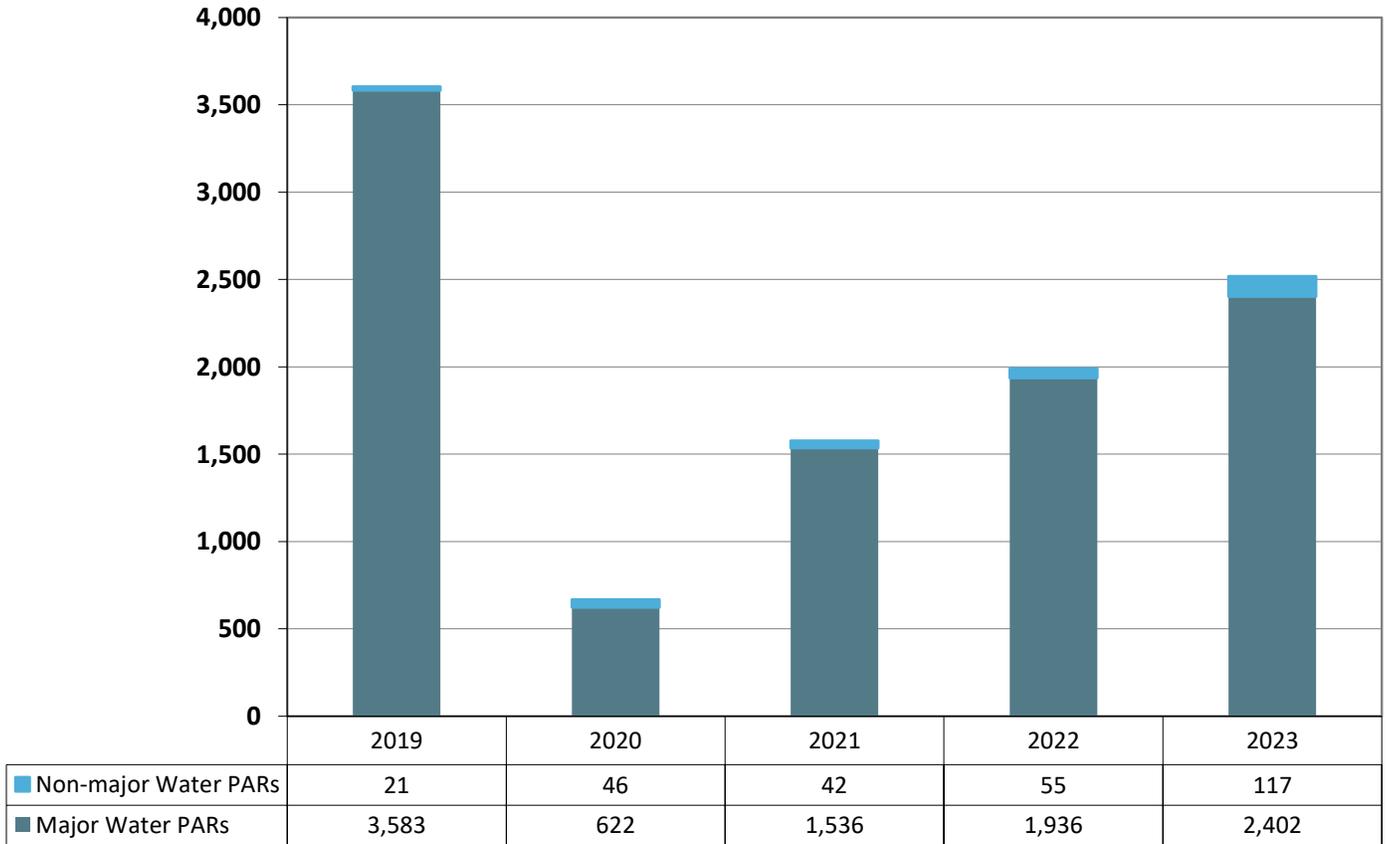
Utility	Number of Days		
	2021	2022	2023
Aqua	13.7	3.1	1.7
PAWC	16.1	15.0	14.0
Large Class A Average	15.4	11.3	11.3
Audubon	17.6	9.0	16.0
Columbia	7.0	7.0	6.0
Community Utilities	0.0	11.1	9.7
Newtown Artesian	6.0	10.5	0.0
Veolia Bethel+	0.0	20.0	70.0
Veolia PA+	25.6	24.8	32.0
York	6.8	7.1	8.7
“Other Class A” Average	20.1	14.2	18.7
All Class A Industry Average	15.7	11.5	11.7

+ The Veolia PA data includes Veolia Bethel as of July 1, 2023, due to the Veolia Water merger.

Payment Arrangement Requests

During 2023, BCS handled 2,519 PARs from residential water customers of the various water utilities. The major Class A water utilities represented 95% (2,402) of the total PARs.

Residential PARs - Water



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

The following tables show the PAR Rate, the Justified PAR Rate, and the Percent of Justified PARs for each Class A water utility in 2021, 2022 and 2023. A complaint is considered “justified” if it is found that the utility did not comply with Commission Orders, policies, regulations, reports, Secretarial Letters, or tariffs. BCS evaluates a statistically valid sampling of complaints for each utility.

The PAR rate is the number of PARs per 1,000 residential customers. The justified PAR numbers are estimated based on the number of PARs when BCS closes the dataset for analyses, after all of the internal processes involving the evaluation and analysis of the data have occurred: 2021 as of Sept. 10, 2022; 2022 as of May 5, 2023; and 2023 as of April 12, 2024. The date varies each year, due to multiple factors that can impact the investigation and closure of cases and/or the evaluation of the statistically valid sampling of cases for each utility and/or the analysis of the data (e.g., caseload fluctuations, staffing fluctuations/changes, systemic issues, etc.). The justified PAR rate is the estimated number of justified PARs per 1,000 residential customers based on a statistically valid sampling of complaints. It is not a percentage. The justified rate is a normalized ratio useful for comparing utility performance among the various utility companies.

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

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

Utility	PAR Rate	Justified PAR Rate	Percent of Justified PARs
Aqua	1.22	0.36	29.6%
PAWC	2.72	0.46	17.0%
Large Class A Average	1.97	0.41	19.8%
Audubon	0.00	0.00	0.0%
Columbia	0.52	0.00	0.0%
Community Utilities	4.89	0.75	15.4%
Newtown Artesian	0.00	0.00	0.0%
Veolia Bethel+	0.00	0.00	0.0%
Veolia PA+	0.71	0.24	33.3%
York	1.03	0.00	0.0%
“Other Class A” Average	0.84	0.09	12.5%
All Class A Industry Average	1.59	0.31	19.4%

+ The Veolia PA data includes Veolia Bethel as of July 1, 2023, due to the Veolia Water merger.

**2021-23 Residential Payment Arrangement Request (PAR) Numbers/Rates
Major Class A Water Utilities**

Utility	2021		2022		2023	
	Number	Rate	Number	Rate	Number	Rate
Aqua	252	0.62	360	0.87	507	1.22
PAWC	1,222	1.93	1,499	2.33	1,767	2.72
Large Class A Total	1,474		1,859		2,274	
Large Class A Average		1.27		1.60		1.97
Audubon	0	0.00	1	0.37	0	0.00
Columbia	5	0.51	4	0.37	6	0.52
Community Utilities	2	0.76	9	3.39	13	4.89
Newtown Artesian	1	0.10	1	0.10	0	0.00
Veolia Bethel+	0	0.00	0	0.00	0	0.00
Veolia PA+	29	0.50	31	0.53	42	0.71
York	25	0.39	31	0.46	67	1.03
“Other Class A” Total	62		77		128	
“Other Class A” Average		0.42		0.50		0.84
All Class A Total	1,536		1,936		2,402	
All Class A Industry Average		0.99		1.23		1.59

+ The Veolia PA data includes Veolia Bethel as of July 1, 2023, due to the Veolia Water merger.

**2021-23 Justified Residential Payment Arrangement Request (PAR) Numbers/Rates
Major Class A Water Utilities**

Utility	2021		2022		2023	
	Number	Rate	Number	Rate	Number	Rate
Aqua	39	0.62	99	0.24	150	0.36
PAWC	133	1.93	273	0.42	301	0.46
Large Class A Total	172		372		451	
Large Class A Average		1.27		0.33		0.41
Audubon	0	0.00	0	0.00	0	0.00
Columbia	0	0.51	0	0.00	0	0.00
Community Utilities	1	0.76	2	0.75	2	0.75
Newtown Artesian	0	0.10	0	0.00	0	0.00
Veolia Bethel+	0	0.00	0	0.00	0	0.00
Veolia PA+	5	0.50	5	0.08	14	0.24
York	0	0.39	8	0.12	0	0.00
“Other Class A” Total	6		15		16	
“Other Class A” Average		0.42		0.07		0.09
All Class A Total	178		387		467	
All Class A Industry Average		0.99		0.25		0.31

+ The Veolia PA data includes Veolia Bethel as of July 1, 2023, due to the Veolia Water merger.

**2021-23 Number/Percent of Justified Residential Payment Arrangement Requests (PARs)
Major Class A Water Utilities**

Utility	2021		2022		2023	
	Number	Percent	Number	Percent	Number	Percent
Aqua	39	15.5%	99	27.5%	150	29.6%
PAWC	133	10.9%	273	18.2%	301	17.0%
Large Class A Total	172		372		451	
Large Class A Average		11.7%		20.0%		19.8%
Audubon	0	0.0%	0	0.0%	0	0.0%
Columbia	0	0.0%	0	0.0%	0	0.0%
Community Utilities	1	50.0%	2	22.2%	2	15.4%
Newtown Artesian	0	0.0%	0	0.0%	0	0.0%
Veolia Bethel+	0	0.0%	0	0.0%	0	0.0%
Veolia PA+	5	17.2%	5	16.1%	14	33.3%
York	0	0.0%	8	25.8%	0	0.0%
“Other Class A” Total	6		15		16	
“Other Class A” Average		9.7%		19.5%		12.5%
All Class A Total	178		387		467	
All Class A Industry Average		11.6%		20.0%		19.4%

+ The Veolia PA data includes Veolia Bethel as of July 1, 2023, due to the Veolia Water merger.

PAR Response Time

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

2021-23 Average Response Time to BCS Residential Payment Arrangement Requests (PARs) Major Class A Water Utilities

Utility	Number of Days		
	2021	2022	2023
Aqua	6.2	1.5	1.0
PAWC	8.4	6.2	8.1
Large Class A Average	8.5	4.4	5.1
Audubon	0.0	2.0	0.0
Columbia	10.7	13.3	2.5
Community Utilities	3.5	12.4	4.4
Newtown Artesian	30.0	2.0	0.0
Veolia Bethel+	0.0	0.0	0.0
Veolia PA+	18.5	20.8	15.1
York	4.7	5.3	7.5
“Other Class A” Average	12.8	13.2	8.5
All Class A Industry Average	8.7	4.8	5.5

+ The Veolia PA data includes Veolia Bethel as of July 1, 2023, due to the Veolia Water merger.

Termination and Reconnection of Service

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

The following tables indicate the annual number of residential accounts each of the Class A water utilities terminated and reconnected in 2021, 2022 and 2023. The first table also presents the termination rates for each of these utilities. The termination rate is the number of service terminations divided by the number of residential customers, expressed as a percent.

It is important to note that although the 2023 complaint data for Veolia Bethel is only through June 30, 2023, the termination and reconnection data for Veolia Bethel is through Dec. 31, 2023. The termination and reconnection data for Veolia PA did not include Veolia Bethel until Jan. 1, 2024.

Residential Service Terminations/Termination Rates Major Class A Water Utilities

Utility	Residential Service Terminations			Termination Rates		
	2021	2022	2023	2021	2022	2023
Aqua	7,070	5,585	6,197	1.70	1.35	1.49
PAWC	20,340	24,625	16,368	3.21	3.83	2.52
Large Class A Total	27,410	30,210	22,565			
Large Class A Average				2.63	2.81	2.12
Audubon	7	29	31	0.26	1.08	1.17
Columbia	132	264	310	1.34	2.43	2.71
Community Utilities	25	80	94	0.94	3.02	3.54
Newtown Artesian	18	14	20	0.19	0.14	0.21
Veolia Bethel	0	0	0	0.00	0.00	0.00
Veolia PA	367	570	700	0.63	0.97	1.18
York	495	269	196	0.78	0.40	0.30
"Other Class A" Total	1,044	1,226	1,351			
"Other Class A" Average				0.70	0.79	0.88
All Class A Total	28,454	31,436	23,916			
All Class A Industry Average				2.39	2.56	1.96

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

Utility	Residential Service Reconnections			Reconnection Rates		
	2021	2022	2023	2021	2022	2023
Aqua	5,090	4,879	5,473	71.99	87.36	88.32
PAWC	14,239	16,663	10,668	70.00	69.10	65.18
Large Class A Total	19,329	21,542	16,141			
Large Class A Average				70.52	72.54	71.53
Audubon	5	25	25	71.43	86.21	80.65
Columbia	118	228	277	89.39	86.36	89.35
Community Utilities	15	55	75	60.00	68.75	79.79
Newtown Artesian	13	9	20	72.22	64.29	100.00
Veolia Bethel	0	0	0	0.00	0.00	0.00
Veolia PA	180	386	440	49.05	67.72	62.86
York	217	145	122	43.84	53.90	62.24
“Other Class A” Total	548	848	959			
“Other Class A” Average				52.49	69.17	70.98
All Class A Total	19,877	22,390	17,100			
All Class A Industry Average				69.86	72.40	71.50

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 an 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 2021 through 2023 as of July 25, 2024. The Infraction Category tables present detailed information about the infractions identified in 2023 complaints to the BCS.

The infraction rate is the number of informally verified infractions per 1,000 residential customers. Dividing per 1,000 customers normalizes the data for comparison purposes. The infraction rate is not a percentage. [Appendix B-1](#) provides a list of the infractions included in each infraction category.

Commission Infraction Rates Major Class A Water Utilities

Utility	2021	2022	2023
Aqua	0.12	0.35	0.51
PAWC	0.24	0.58	0.47
Audubon	0.00	0.00	0.00
Columbia	0.00	0.09	0.00
Community Utilities	0.76	0.38	0.75
Newtown Artesian	0.00	0.00	0.00
Veolia Bethel+	0.00	0.00	0.00
Veolia PA+	0.22	0.14	0.15
York	0.00	0.03	0.05

+ The Veolia PA data includes Veolia Bethel as of July 1, 2023, due to the Veolia Water merger.

2023 Number and Percent of Major Water Utility Infractions

Category	Aqua	PAWC	Audubon	Columbia	Community Utilities	Newtown Artesian	Veolia Bethel+	Veolia PA+	York	All Class A Water
Billing and Payment	3	29	0	0	0	0	0	0	1	33
	1%	9%	0%	0%	0%	0%	0%	0%	33%	5%
Meter Reading	20	45	0	0	0	0	0	0	0	65
	9%	15%	0%	0%	0%	0%	0%	0%	0%	3%
Make-Up Bills	25	28	0	0	0	0	0	2	0	55
	12%	9%	0%	0%	0%	0%	0%	22%	0%	5%
Transfer of Accounts	0	2	0	0	0	0	0	0	0	2
	0%	1%	0%	0%	0%	0%	0%	0%	0%	<1%
Credit Standards and Deposits	15	29	0	0	0	0	0	0	0	44
	7%	9%	0%	0%	0%	0%	0%	0%	0%	2%
Termination Grounds	20	24	0	0	0	0	0	0	0	44
	9%	8%	0%	0%	0%	0%	0%	0%	0%	2%
Termination Procedures	13	19	0	0	0	0	0	0	0	32
	6%	6%	0%	0%	0%	0%	0%	0%	0%	1%
Reconnection of Service	47	28	0	0	0	0	0	3	0	78
	22%	9%	0%	0%	0%	0%	0%	33%	0%	7%
Liability – Responsibility for Bills	0	1	0	0	0	0	0	0	0	1
	0%	<1%	0%	0%	0%	0%	0%	0%	0%	<1%
Landlord / Ratepayer	1	8	0	0	0	0	0	0	0	9
	<1%	3%	0%	0%	0%	0%	0%	0%	0%	<1%
Dispute Handling	49	65	0	0	2	0	0	3	0	119
	23%	21%	0%	0%	100%	0%	0%	33%	0%	20%
Other	18	28	0	0	0	0	0	1	2	49
	9%	9%	0%	0%	0%	0%	0%	11%	67%	11%
Total	211	306	0	0	2	0	0	9	3	531

+ The Veolia PA data includes Veolia Bethel as of July 1, 2023, due to the Veolia Water merger.

Municipal Water, Sewer and Stormwater

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

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

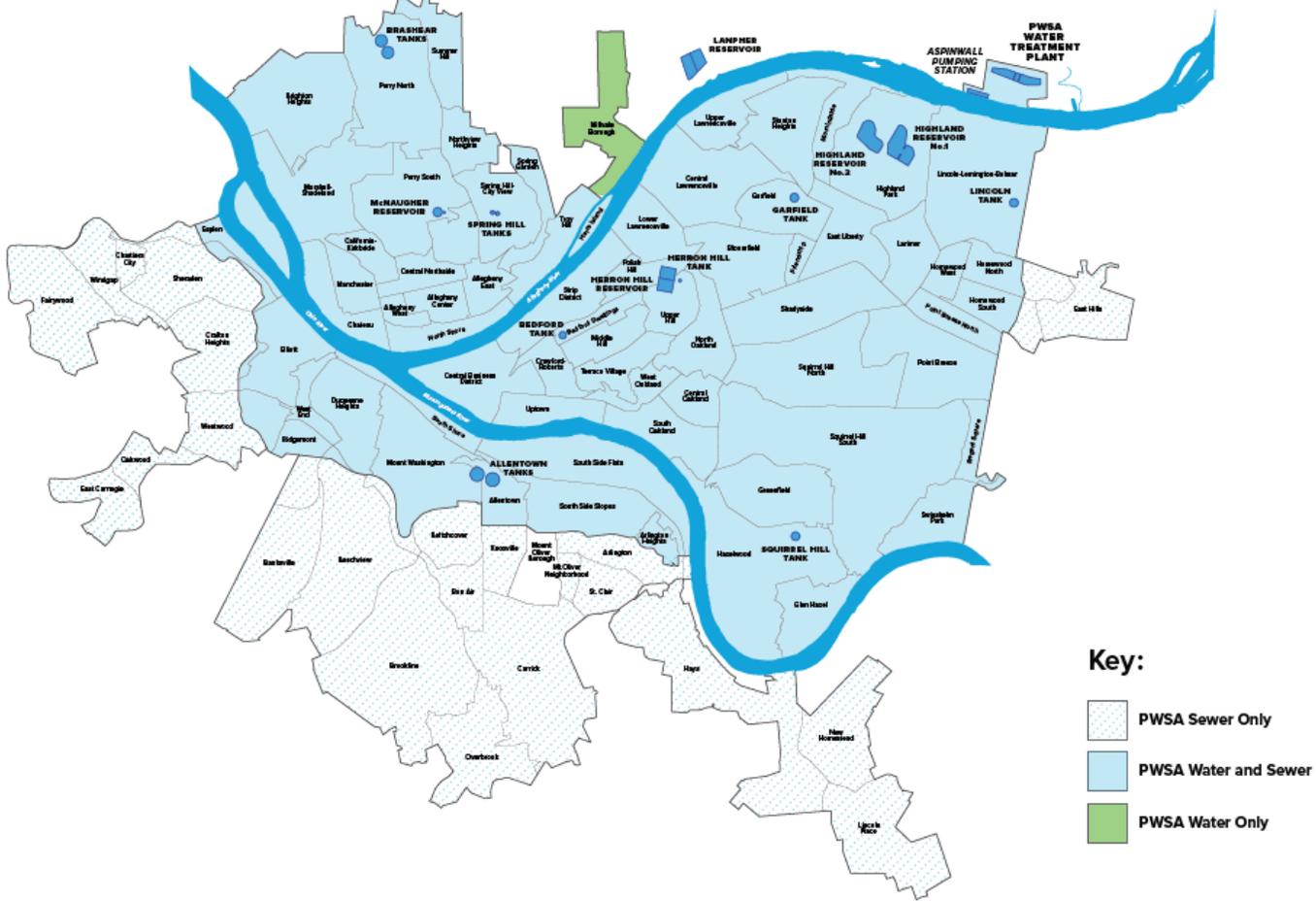
Stage 2 Compliance Plan: Chapters 14 & 56, Discontinuance of Services to Leased Premises Act (DSLPA) and Collections: On March 14, 2022, a Joint Petition for Settlement Regarding PWSA's April 9, 2021, Stage 2 Compliance Plan: Chapters 14 & 56, DSLPA and Collections was filed by the Pittsburgh Water and 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 Aug. 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. On Jan. 11, 2023, the PUC issued a Secretarial Letter approving Supplement No 2. to Tariff Storm Water – Pa. P.U.C. No. 1 with an effective date of Jan. 14, 2023.

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

PWSA Service Areas



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

The data provided in the tables below include PWSA informal complaint activity. PWSA compliance data is not provided in this section. BCS has been and will continue to monitor PWSA’s implementation of

compliance initiatives emanating from the Stage 1 and Stage 2 proceedings. BCS will publish PWSA infraction data in future UCARE reports.

Total Complaint Numbers and Rates

The following table shows the total number of all complaints, Consumer Complaints, PARs, and Inquiries combined. The total complaint rate is the total number of complaints per 1,000 residential customers.

2021-23 Residential Total Complaint Numbers/Rates Municipal Water and Sewer Utilities

Utility	2021		2022		2023	
	Number	Rate	Number	Rate	Number	Rate
PWSA-Water	276	2.82	271	2.73	369	3.65
PWSA-Sewer	47	0.48	47	0.47	76	0.75
Total	323		318		445	
Industry Average		1.65		1.60		2.20

Inquiries

The following table shows the number of residential Inquiries for PWSA.

2021-23 Residential Inquiries Municipal Water and Sewer Utilities

Utility	2021	2022	2023
PWSA-Water	73	63	55
PWSA-Sewer	19	13	17
Total	92	76	72

Consumer Complaints

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

**2021-23 Residential Consumer Complaint Numbers/Rates
Municipal Water and Sewer Utilities**

Utility	2021		2022		2023	
	Number	Rate	Number	Rate	Number	Rate
PWSA-Water	180	1.84	174	1.75	226	2.24
PWSA-Sewer	20	0.20	26	0.26	28	0.28
Total	200		200		254	
Industry Average		1.02		1.01		1.26

Consumer Complaint Response Time

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

**2021-23 Average Response Time to BCS
Residential Consumer Complaints
Municipal Water and Sewer Utilities**

Utility	Number of Days		
	2021	2022	2023
PWSA-Water	11.1	13.0	24.5
PWSA-Sewer	10.1	14.8	25.3
Industry Average	11.1	13.2	24.5

Payment Arrangement Requests

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

**2021-23 Residential Payment Arrangement Request (PAR) Rates
Municipal Water and Sewer Utilities**

Utility	2021		2022		2023	
	Number	Rate	Number	Rate	Number	Rate
PWSA-Water	27	0.28	34	0.34	90	0.89
PWSA-Sewer	8	0.08	8	0.08	32	0.32
Total	35		42		122	
Industry Average		0.18		0.21		0.60

PAR Response Time

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

**2021-23 Average Response Time to BCS
Residential Payment Arrangement Requests (PARs)
Municipal Water and Sewer Utilities**

Utility	Number of Days		
	2021	2022	2023
PWSA-Water	8.9	10.4	25.2
PWSA-Sewer	10.3	8.1	24.8
Industry Average	9.5	10.9	25.7

Termination and Reconnection of Service

The termination rate is the number of service terminations divided by the number of residential customers, expressed as a percent. The number of PWSA terminations represents the total number of residential customers who were terminated. This total includes customers who received combined water and sewer services, customers who only received sewer service, and those customers who received water service only. The number of PWSA reconnections represents the total number of residential customers who were reconnected. This total includes customers who received combined water and sewer services, customers who only received sewer service, and those customers who received water service only.

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

Utility	Residential Service Terminations			Termination Rates		
	2021	2022	2023	2021	2022	2023
PWSA	177	440	215	0.18	0.44	0.21

**Residential Service Reconnections
Municipal Water and Sewer Utilities**

Utility	Residential Service Reconnections			Reconnection Rates		
	2021	2022	2023	2021	2022	2023
PWSA	257	151	80	145.20	34.32	37.21

Stormwater Complaints

In 2022, PWSA began assessing a separate stormwater fee to fund stormwater projects and initiatives necessary to improve stormwater management in Pittsburgh. BCS tracks the number of PWSA complaints that contain a stormwater component. The following table shows the total number of residential PWSA informal complaints in 2022-2023, compared to the number of complaints that included a dispute regarding stormwater.

**2022-23 Stormwater Complaints
Residential Informal Complaints (Consumer Complaints and PARs)
Municipal Water and Sewer Utilities**

Utility	Total Number of Complaints		Total Number of Complaints with a Stormwater Component		% of Complaints with a Stormwater Component	
	2022	2023	2022	2023	2022	2023
PWSA-Water	208	316	9	8	4%	3%
PWSA-Sewer	34	60	9	5	27%	8%
Total	242	376	18	13	7%	3%

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) – Aqua recently launched a Customer Assistance Program (CAP) for its customers. Building upon the assistance provided through the former Helping Hand program, the CAP maintains the \$25 per month credit towards pre-program arrearages for timely payments made. It also incorporates a tiered discount program, providing the highest level of discount to those with the lowest incomes. Customers with incomes up to 200% of Federal Poverty Level can qualify. Customers must provide income documentation or complete a Zero Income Form to enroll and will be recertified on a recurring basis according to their income type. Customers with high usage may be identified for a conservation kit or kits can also be requested by participants. At year end 2023, Aqua’s CAP enrollment was 3,106 participants. Discounts totaling \$464,576 were provided to participants in 2023. And, \$68,974 in arrearage forgiveness benefits were provided to 1,056 customers.

Pennsylvania American Water Co. (PAWC) – In 1991, PAWC established the “Help to Others” (H2O) program to assist payment-troubled customers. The H2O program includes a bill discount program, a conservation program, and a hardship fund. Beginning Jan. 28, 2023, the H2O program changed its bill discount program to be tailored to the customer’s income level. PAWC’s bill discount program has three tiers. The program provides a discount toward the customer’s water bills of 40% to 80% on the monthly service fee and 25% to 80% on the monthly volumetric charges. The program also provides a discount of 30% to 80% on the total wastewater charges. There were approximately 29,680 customers in 2023 who were billed at the discounted rate.

The H2O program also offers a conservation program, which provides water-saving devices and conservation education to customers. In 2023, nearly 1,200 income-eligible customers were provided water-saving devices at no cost.

As part of the hardship fund, 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 PAWC’s hardship fund administrator that provides cash assistance to utility customers who need help paying their utility bills. In 2023, PAWC’s annual contributions for hardship fund grants to income-eligible water and wastewater customers were \$625,000 and \$125,000, respectively.

During the 2023 calendar year, PAWC distributed grants totaling \$1,089,958 for water customers and \$231,434 for wastewater customers. As a result, 3,144 water customers received an average hardship fund grant of \$347, and 594 wastewater customers received an average hardship grant of \$390.

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

The Bill Discount Program provides a percentage-based reduction of fixed monthly water, wastewater conveyance and stormwater charges for customers who are at or below 150% of the Federal Poverty Level. In 2023, bill discounts remained at 100% of the fixed monthly water and wastewater conveyance base charges and 85% of the stormwater charges. A total of 7,063 customers were enrolled in the Bill Discount Program. PGH2O Cares personnel proactively reach out to customers to recertify for the Bill Discount Program every two years. For customers with past due balances who are enrolled in the Bill Discount Program, PWSA credits their account in the amount of \$30 for each on-time, monthly payment in an active payment plan to assist

with reducing their arrears. In 2023, PWSA provided 9,274 Arrearage Forgiveness Credits, expunging \$278,220 in customer debt.

The Hardship Grant Program extends grants up to \$300 per year for customers who are at or below 150% of the Federal Poverty Level. In 2023, PWSA provided \$133,906 in grants to 532 customers for an average benefit of \$252.

Confirmed low-income customers who are at or below 300% of the Federal Poverty Level are provided a stay of termination for non-payment from December 1st through March 31st regardless of the heating source in the home. The PGH2O Cares team provides payment counseling and payment arrangements to those customers with past due charges.

The Lead Service Line Replacement Reimbursement Program provides for 100% reimbursement of private side lead service line replacement costs for customers who are at or below 300% of the Federal Poverty Level, with a decreasing reimbursement percentage to 500% of the Federal Poverty Level, after which water customers are eligible for a \$1,000 stipend if they hire a private plumber and replace their own private lead service line. During 2023, a total of 476 applications were approved for reimbursement, and 56 reimbursements were paid at a total cost of nearly \$444,000.

On Sept. 5, 2023, PWSA embarked on a new program offering, the Line Repair and Water Conservation Pilot Program, to provide income-qualified customers with in-home plumbing repairs and education on effective water conservation practices. After an agreement is signed by the property owner, a PWSA contractor repairs leaks on exposed plumbing, replaces failing plumbing devices, and installs low flow showerheads, toilets, and aerators. All work is covered by a one-year warranty. The PGH2O Cares team then ensures that the customer is enrolled in usage alerts within the Customer Advantage Portal so that future plumbing issues may be dealt with swiftly. In 2023, 47 customers received in-home plumbing repairs in the first four months of the program and on average achieved a 33% reduction of their monthly consumption.

PWSA customers who are billed for sewage treatment charges on behalf of the Allegheny County Sanitary Authority (ALCOSAN) are also eligible for assistance through ALCOSAN's Clean Water Assistance Fund. This program follows the same income requirements as PWSA's Bill Discount Program. In 2023, ALCOSAN provided \$93,894 in grants to 2,200 eligible PWSA customers.

Veolia Water Bethel (Veolia Bethel) – Veolia Bethel implemented the “Veolia Cares” program in 2005. Veolia Cares is a nonprofit 501(c)(3) organization that provides financial assistance to customers who experience a temporary financial crisis caused by such occurrences as a job loss, severe illness, casualty or extensive military service. Cash grants up to \$300 are provided to qualifying customers who are first screened by the Salvation Army for eligibility. To be eligible for a grant, customers must have made a nominal payment within the last 90 days. During the 2023 program year, the utility provided grants totaling \$300 to qualifying customers.

Veolia Water Pennsylvania (Veolia PA) – Veolia PA implemented the “Veolia Cares” program in 2005. Veolia Cares is a nonprofit 501(c)(3) organization that provides financial assistance to customers who experience a temporary financial crisis caused by such occurrences as a job loss, severe illness, casualty or extensive military service. Cash grants up to \$300 are provided to qualifying customers who are first screened by the Salvation Army for eligibility. To be eligible for a grant, customers must have made a nominal payment within the last 90 days. During the 2023 program year, the utility provided grants totaling \$41,592 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 \$1,029 in 2023 for customer plumbing repairs and enrolled a total of four new customers in 2023 in the York Water Cares program. As of program end 2023, six customers received arrearage forgiveness benefits totaling \$360 for an average benefit of approximately \$60 per customer. The utility anticipates an annual savings of \$1,000 in 2023 in costs for termination proceedings that may be avoided as a result of customer participation in the York Water Cares program.

Federal Low Income Household Water Assistance Program (LIHWAP) – On July 10, 2023, the LIHWAP program reopened after a successful program in 2022. In Pennsylvania, LIHWAP assisted in providing relief to residential water and wastewater customers who had difficulty paying their bills. The Federal government recognized that the COVID-19 pandemic amplified unaffordability concerns for many families. Pennsylvania received additional federal funding to reopen the program in 2023:

- issuing 52,520 LIHWAP grants, for a total of \$43,879,008;
- enrolling 912 water and wastewater vendors in the program; and,
- providing an average grant amount of \$552.

By the end of the program in 2023, the Department of Human Services (DHS) had approximately \$1.7 million in funding remaining. DHS sent approximately 46,000 supplemental grants for \$38 to vulnerable households to spend the remainder of the LIHWAP funds. As of December 2024, Congress has not allocated any additional federal funding for LIHWAP.

Water Industry Chapter Summary

The overall industry residential **Total Complaint Number** for the major Class A water utilities increased from 3,452 in 2021 to 4,622 in 2023 (33.9% higher) but was less than the pre-pandemic year of 2019. Likewise, the **Total Complaint Rate** increased from 2.90 in 2021 to 3.79 in 2023 but was less than the 2019 rate.

The total number **Consumer Complaints** from residential water consumers increased from 1,272 in 2021 to 1,453 in 2023 (14.2% higher) and was higher than the pre-pandemic year of 2019 with 1,106.

Billing disputes was the top **Consumer Complaint Category** for the major Class A water utilities for 2023, which accounted for 43% of the total of the 709 Consumer Complaints evaluated. The water utility with the most billing disputes was PAWC with 178, which was 40% of PAWC’s evaluated Consumer Complaints. Similarly, 51% of the Consumer Complaints evaluated for Aqua were billing disputes.

The **Consumer Complaint Number** for all major Class A water utilities increased by 13.3% from 1,070 in 2021 to 1,212 in 2023. Likewise, the All Class A industry average **Consumer Complaint Rate** increased from 0.74 in 2021 to 0.80 in 2023. Aqua’s rate dropped from 0.71 in 2021 to 0.62 in 2023, while PAWC’s rate rose from 1.14 in 2021 to 1.37 in 2023.

From 2021 to 2023, the **Justified Consumer Complaint Rates** increased for Aqua, from 0.10 to 0.20, and for PAWC, from 0.12 to 0.25. The All Class A industry average for the **Percent of Justified Consumer Complaints** rose from 11.2% in 2021 to 21.0% in 2023.

Aqua's **Consumer Complaint Response Time** dropped by 12.0 days, from 13.7 in 2021 to 1.7 in 2023. PAWC's time decreased 2.1 days, from 16.1 in 2021 to 14.0 in 2023.

The total number of **PARs** from residential water consumers increased from 1,578 in 2021 to 2,519 in 2023 (59.6% higher) but was still less than the pre-pandemic year of 2019 with 3,604.

The **PAR Number** for all major Class A water utilities increased by 56.4% from 1,536 in 2021 to 2,402 in 2023. Relatedly, the **PAR Rate** increased for the Large Class A water utilities from 1.27 in 2021 to 1.97 in 2023.

From 2021 to 2023, the **Justified PAR Rate** decreased for Aqua, from 0.62 to 0.36, and for PAWC from 1.93 to 0.46. However, the Large Class A average **Percent of Justified PARs** increased considerably from 11.7% in 2021 to 19.8% in 2023.

The **PAR Response Time** for Aqua dropped by 5.2 days from 6.2 in 2021 to 1.0 in 2023, and PAWC's time decreased slightly by 0.3 days, from 8.4 in 2021 to 8.1 in 2023.

Overall, both the number of residential service **Terminations** and **Reconnections** decreased for all major Class A water utilities from 2021 compared to 2023, by -15.9% and -14.0%, respectively.

The All Class A industry average for the **Infraction Category** of Dispute Handling (20%) had the highest percentage in 2023. The Dispute Handling category accounted for 49, or 23%, of Aqua's infractions, while it accounted for 65, or 21%, of the infractions for PAWC.

PWSA's residential **Total Complaint Number** increased from 323 in 2021 to 445 in 2023 (37.8% higher) but was less than the pre-pandemic year of 2019. Likewise, PWSA's **Total Complaint Rate** increased from 1.65 in 2021 to 2.20 in 2023 but was less than the 2019 rate.

The residential **Inquiries** for PWSA dropped by -21.7%, from 92 in 2021 to 72 in 2023.

The **Consumer Complaint Number** for PWSA increased by 27.0% from 200 in 2021 to 254 in 2023. Likewise, PWSA's **Consumer Complaint Rate** increased from 1.02 in 2021 to 1.26 in 2023.

PWSA's **Consumer Complaint Response Time** increased significantly, by 13.4 days, from 11.1 in 2021 to 24.5 in 2023.

The **PAR Number** for PWSA substantially increased, by 248.6%, from 35 in 2021 to 122 in 2023. Relatedly, the **PAR Rate** increased for PWSA from 0.18 in 2021 to 0.60 in 2023.

The **PAR Response Time** for PWSA increased by 16.2 days, from 9.5 in 2021 to 25.7 in 2023.

The number of residential service **Terminations** for PWSA increased by 21.5%, from 177 in 2021 to 215 in 2023. Alternatively, PWSA's **Reconnections** decreased significantly, by -68.9%, from 257 in 2021 to 80 in 2023.

PWSA received -27.8% less **Stormwater Complaints**, from 18 in 2022 to 13 in 2023, which were 7% and 3% of PWSA's total number of complaints, respectively.

8. Telecommunications Industry

During 2023, BCS handled Consumer Complaints related to basic voice service, broadband, Lifeline, payment arrangement requests (PARs) and Inquires from the customers of a variety of telecommunications service providers, including incumbent local exchange carriers (ILECs), competitive local exchange carriers (CLECs), long-distance companies, resellers and eligible telecommunications carriers (ETCs).

In 2023, there were 519 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 2023, based on § 64.201 reporting, Pennsylvania local exchange carriers supplied service to an average of 700,688 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 611,411 residential service lines each in 2023), this chapter will focus on the five major ILECs – Brightspeed f/k/a CenturyLink (**Brightspeed**), Frontier Communications Commonwealth Telephone Co. (**Frontier Commonwealth**), Verizon North LLC (**Verizon North**), Verizon Pennsylvania LLC (**Verizon PA**), and Windstream Communications (**Windstream**). See the [Non-Major Utilities](#) chapter for complaints regarding the non-major telecommunications companies.

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

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

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

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

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

153 of the 504 Verizon PA and Verizon North wire centers throughout the state.¹⁴ The reclassification temporarily waived certain sections of 52 Pa. Code, Chapters 63¹⁵ and 64¹⁶ for a maximum of five years or until the Commission promulgates a final rulemaking addressing competitive reclassification.

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

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

2021-23 Warm Transfers Completed
Residential Informal Complaints (Consumer Complaints and PARs)
Major Local Telecommunications Utilities

Utility	Total Number of Complaints			Total Number of Warm Transfers Completed			% of Warm Transfers Completed		
	2021	2022	2023	2021	2022	2023	2021	2022	2023
Frontier Commonwealth*	122	228	248	5	18	12	4%	8%	5%
Verizon North	70	29	35	13	4	3	19%	14%	9%
Verizon PA	951	593	519	160	73	45	17%	12%	9%
Total	1,432	850	802	178	95	60	12%	11%	7%

* Frontier Commonwealth began accepting warm transfers in October 2021.

¹⁴ See Appendix B of Docket Nos. [P-2014-2446303](#) and [P-2014-2446304](#), March 4, 2015.

¹⁵ See Appendix D of Docket Nos. [P-2014-2446303](#) and [P-2014-2446304](#), March 4, 2015.

¹⁶ See Appendix E of Docket Nos. [P-2014-2446303](#) and [P-2014-2446304](#), March 4, 2015.

Total Complaint Numbers and Rates

The following table shows the total number of all complaints, Consumer Complaints, PARs, and Inquiries combined. The total complaint rate is the total number of complaints per 1,000 residential customers.

2021-23 Residential Total Complaint Numbers/Rates Major Local Telecommunications Utilities

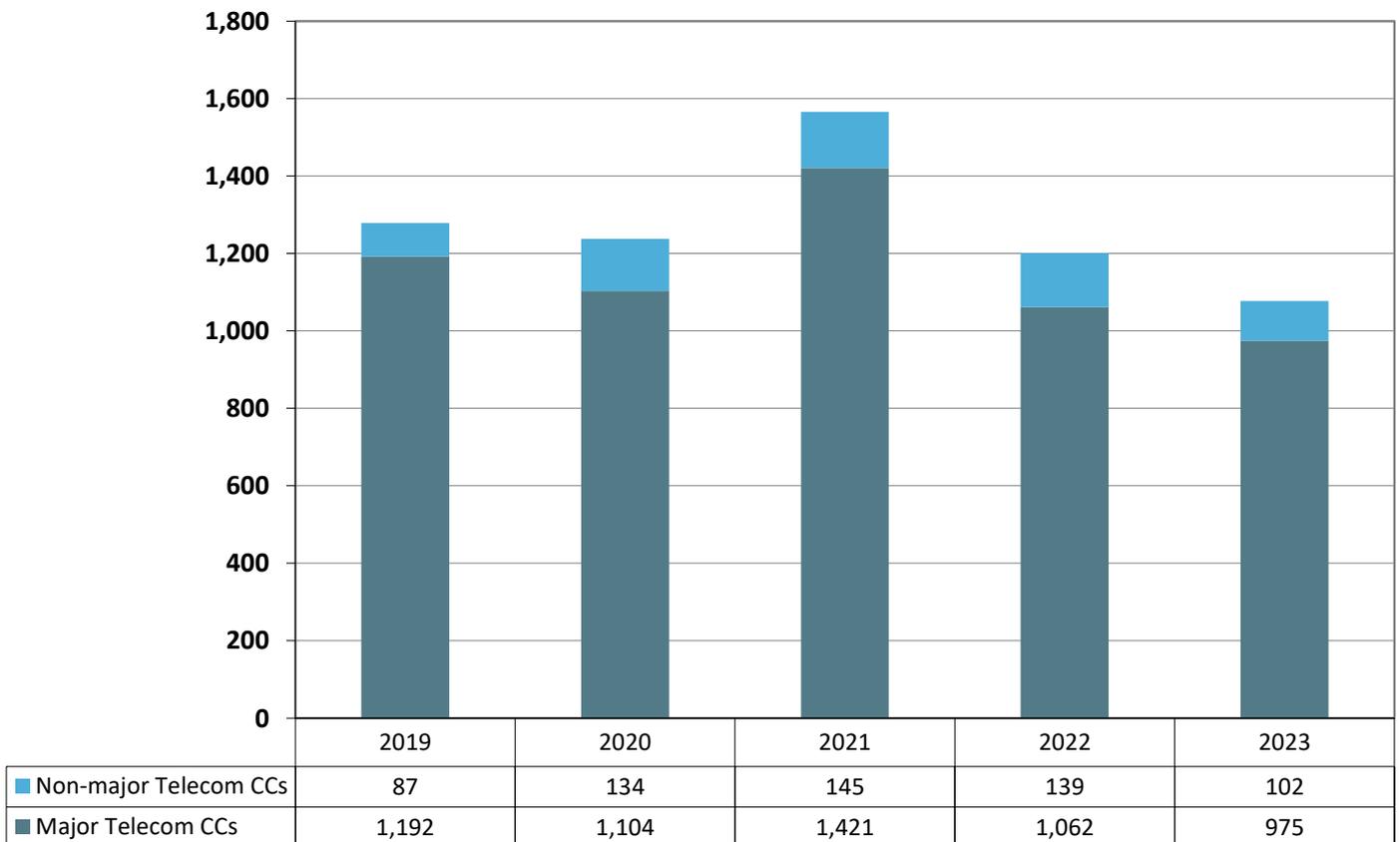
Utility	2021		2022		2023	
	Number	Rate	Number	Rate	Number	Rate
Brightspeed	233	2.47	177	2.15	115	1.55
Frontier Commonwealth	165	2.43	291	4.60	303	5.16
Verizon North	94	1.04	40	0.50	52	0.73
Verizon PA	1,356	3.17	839	2.25	819	2.47
Windstream	136	1.73	112	1.49	123	1.63
Total	1,984		1,459		1,412	
Industry Average		2.61		2.17		2.31

Consumer Complaints

Although BCS handled Consumer Complaints about different types of telecommunications service providers in 2023, the complaints predominantly came from the residential customers of the five major ILECs.

During 2023, BCS handled 1,077 total Consumer Complaints from residential customers of the various telecommunications service providers. The five major ILECs represented 91% (975) of the total Consumer Complaints, while only 12 Consumer Complaints were received for the non-major ILECs. In 2023, 48 of the total Consumer Complaints were from residential customers of the CLECs operating in Pennsylvania, and BCS handled an additional 29 Consumer Complaints regarding ETCs that provide Lifeline services. The remaining Consumer Complaints in 2023 were from residential customers of other telecommunications providers such as long-distance carriers, resellers and Voice over Internet Protocol (VoIP).

Residential Consumer Complaints (CCs) - Telecom



Consumer Complaint Categories

The following table shows the number and percentage of 2023 complaints in each of the 11 categories used by BCS policy analysts for compliance evaluation. These categories are based on all evaluated residential complaints filed with BCS in 2023 and evaluated by BCS as of April 12, 2024. See [Appendix C-1](#) for an explanation of the categories.

Number and Percent of Consumer Complaints by Dispute Category 2023 Complaints Evaluated Major Local Telecommunications Utilities

Category	Brightspeed	Frontier Commonwealth	Verizon North	Verizon PA	Windstream	Telecommunications Industry
Unsatisfactory Service	47	191	28	345	63	674
	66%	87%	97%	81%	80%	82%
Service Delivery	8	17	1	29	4	59
	11%	8%	3%	7%	5%	7%
Billing Disputes	8	6	0	32	5	51
	11%	3%	0%	7%	6%	6%
Non-Recurring Charges	4	2	0	6	2	14
	6%	1%	0%	1%	3%	2%
Discontinuance / Transfer	1	1	0	6	2	10
	1%	<1%	0%	1%	3%	1%
Service Terminations	0	1	0	3	2	6
	0%	<1%	0%	1%	3%	1%
Credit and Deposits	0	0	0	2	0	2
	0%	0%	0%	<1%	0%	<1%
Competition	1	0	0	0	0	1
	1%	0%	0%	0%	0%	<1%
Annoyance Calls	0	0	0	0	0	0
	0%	0%	0%	0%	0%	0%
Toll Services	0	0	0	0	0	0
	0%	0%	0%	0%	0%	0%
All Other Problems	2	1	0	5	1	9
	3%	<1%	0%	1%	1%	1%
Total	71	219	29	428	79	826

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

The following tables show the Consumer Complaint Rate, the Justified Consumer Complaint Rate, and the Percent of Justified Consumer Complaints for each major telecommunications utility in 2021, 2022 and

2023. A complaint is considered “justified” if it is found that the utility did not comply with Commission Orders, policies, regulations, reports, Secretarial Letters, or tariffs. BCS evaluates a statistically valid sampling of complaints for each utility.

The Consumer Complaint rate is the number of Consumer Complaints per 1,000 residential customers. The justified Consumer Complaint numbers are estimated based on the number of Consumer Complaints when BCS closes the dataset for analyses, after all of the internal processes involving the evaluation and analysis of the data have occurred: 2021 as of Sept. 10, 2022; 2022 as of May 5, 2023; and 2023 as of April 12, 2024. The date varies each year, due to multiple factors that can impact the investigation and closure of cases and/or the evaluation of the statistically valid sampling of cases for each utility and/or the analysis of the data (e.g., caseload fluctuations, staffing fluctuations/changes, systemic issues, etc.). The justified Consumer Complaint rate is the estimated number of justified Consumer Complaints per 1,000 residential customers based on a statistically valid sampling of complaints. The justified Consumer Complaint rate is a normalized ratio useful for comparing utility performance among the various utility companies. It is not a percentage.

The 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.

**2023 Residential Consumer Complaint Rates,
Justified Consumer Complaint Rates, and Percent of Justified Consumer Complaints
Major Local Telecommunications Utilities**

Utility	Consumer Complaint Rate	Justified Consumer Complaint Rate	Percent of Justified Consumer Complaints
Brightspeed	1.17	0.57	48.3%
Frontier Commonwealth	4.22	2.86	67.7%
Verizon North	0.49	0.24	48.6%
Verizon PA	1.54	0.63	40.7%
Windstream	1.22	0.37	30.4%
Industry Average	1.73	0.93	47.6%

**2021-23 Residential Consumer Complaint Numbers/Rates
Major Local Telecommunications Utilities**

Utility	2021		2022		2023	
	Number	Rate	Number	Rate	Number	Rate
Brightspeed	176	1.87	132	1.61	87	1.17
Frontier Commonwealth	121	1.78	226	3.58	248	4.22
Verizon North	70	0.78	29	0.36	35	0.49
Verizon PA	944	2.20	586	1.57	513	1.54
Windstream	110	1.40	89	1.19	92	1.22
Total	1,421		1,062		975	
Industry Average		1.61		1.66		1.73

**2021-23 Justified Residential Consumer Complaint Numbers/Rates
Major Local Telecommunications Utilities**

Utility	2021		2022		2023	
	Number	Rate	Number	Rate	Number	Rate
Brightspeed	106	1.12	77	0.94	42	0.57
Frontier Commonwealth	64	0.94	168	2.66	168	2.86
Verizon North	40	0.44	17	0.21	17	0.24
Verizon PA	520	1.21	352	0.94	209	0.63
Windstream	48	0.61	38	0.51	28	0.37
Total	778		652		464	
Industry Average		0.87		1.05		0.93

**2021-23 Number/ Percent of Justified Residential Consumer Complaints
Major Telecommunications Utilities**

Utility	2021		2022		2023	
	Number	Rate	Number	Rate	Number	Rate
Brightspeed	106	60.2%	77	58.3%	42	48.3%
Frontier Commonwealth	64	52.9%	168	74.3%	168	67.7%
Verizon North	40	57.1%	17	58.6%	17	48.6%
Verizon PA	520	55.1%	352	60.1%	209	40.7%
Windstream	48	43.6%	38	42.7%	28	30.4%
Total	778		652		464	
Industry Average		54.8%		61.4%		47.6%

Consumer Complaint Response Time

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

**2021-23 Average Response Time to BCS
Residential Consumer Complaints
Major Local Telecommunications Utilities**

Utility	Number of Days		
	2021	2022	2023
Brightspeed	21.7	25.5	25.7
Frontier Commonwealth	13.0	19.7	15.8
Verizon North	13.3	17.1	15.4
Verizon PA	15.1	14.2	15.4
Windstream	15.4	16.0	14.7
Industry Average	16.7	17.0	16.4

Payment Arrangement Requests (PARs)

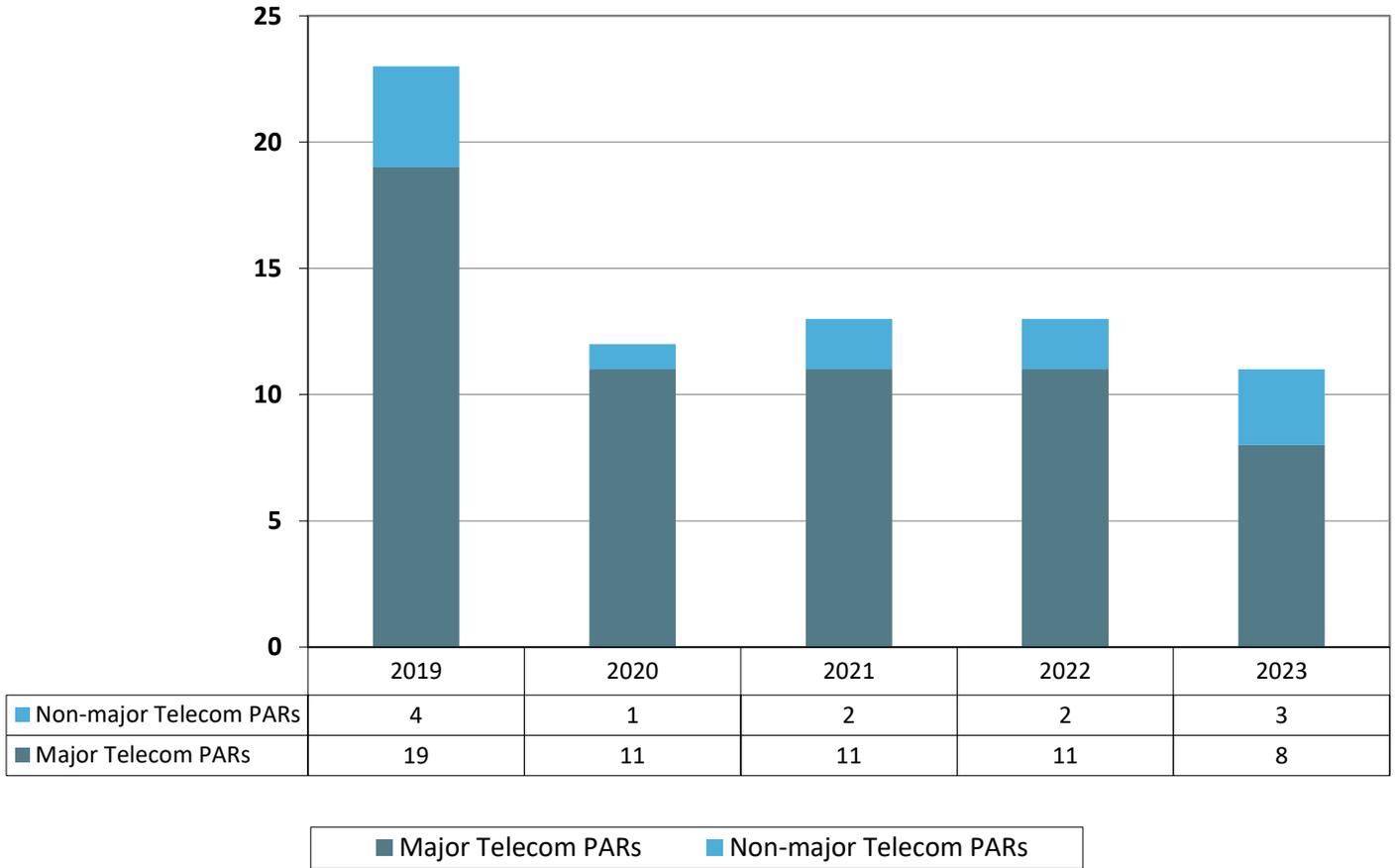
Telecommunications service consists of three components: basic service, non-basic service and toll service. BCS does not handle requests for payment arrangements that involve toll or non-basic services because with respect to telecommunications payment arrangements, the PUC does not exert payment arrangement 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.¹⁷ 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.

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.

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 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. For the reasons mentioned above regarding the limited jurisdiction of BCS, the number of contacts BCS receives related to telecommunications PARs is very low. During 2023, BCS handled 11 PARs from residential customers of the various telecommunications service providers. The five major telecommunications utilities represented 73% (eight) of the total PARs.

¹⁷ 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.

Residential PARs - Telecom



The 2021, 2022 and 2023 justified PAR rates and response times for the major telecommunications utilities are presented in the tables that follow.

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

The following tables show the PAR Rate, the Justified PAR Rate, and the Percent of Justified PARs for each major telecommunications utility in 2021, 2022 and 2023. A complaint is considered “justified” if it is found that the utility did not comply with Commission Orders, policies, regulations, reports, Secretarial Letters, or tariffs. BCS evaluates a statistically valid sampling of complaints for each utility.

The PAR rate is the number of PARs per 1,000 residential customers. The justified PAR numbers are estimated based on the number of PARs when BCS closes the dataset for analyses, after all of the internal processes involving the evaluation and analysis of the data have occurred: 2021 as of Sept. 10, 2022; 2022 as of May 5, 2023; and 2023 as of April 12, 2024. The date varies each year, due to multiple factors that can impact the investigation and closure of cases and/or the evaluation of the statistically valid sampling of cases for each utility and/or the analysis of the data (e.g., caseload fluctuations, staffing fluctuations/changes, systemic issues, etc.). The justified PAR rate is the estimated number of justified PARs per 1,000 residential customers based on a statistically valid sampling of complaints. It is not a percentage. The justified rate is a normalized ratio useful for comparing utility performance among the various utility companies.

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

2023 Residential Payment Arrangement Request (PAR) Rates, Justified PAR Rates, and Percent of Justified PARs Major Local Telecommunications Utilities

Utility	PAR Rate	Justified PAR Rate	Percent of Justified PARs
Brightspeed	0.01	0.00	0.0%
Frontier Commonwealth	0.00	0.00	0.0%
Verizon North	0.00	0.00	0.0%
Verizon PA	0.02	0.01	33.3%
Windstream	0.01	0.00	0.0%
Industry Average	0.01	0.00	25.0%

**2021-23 Residential Payment Arrangement Request (PAR) Numbers/Rates
Major Local Telecommunications Utilities**

Utility	2021		2022		2023	
	Number	Rate	Number	Rate	Number	Rate
Brightspeed	2	0.02	0	0.00	1	0.01
Frontier Commonwealth	1	0.01	2	0.03	0	0.00
Verizon North	0	0.00	0	0.00	0	0.00
Verizon PA	7	0.02	7	0.02	6	0.02
Windstream	1	0.01	2	0.03	1	0.01
Total	11		11		8	
Industry Average		0.01		0.02		0.01

**2021-23 Justified Residential Payment Arrangement Request (PAR) Numbers/Rates
Major Local Telecommunications Utilities**

Utility	2021		2022		2023	
	Number	Rate	Number	Rate	Number	Rate
Brightspeed	0	0.00	0	0.00	0	0.00
Frontier Commonwealth	0	0.00	2	0.03	0	0.00
Verizon North	0	0.00	0	0.00	0	0.00
Verizon PA	4	0.01	1	0.00	2	0.01
Windstream	0	0.00	0	0.00	0	0.00
Total	4		3		2	
Industry Average		0.00		0.01		0.00

**2021-23 Number/Percent of Justified Residential Payment Arrangement Requests (PARs)
Major Local Telecommunications Utilities**

Utility	2021		2022		2023	
	Number	Rate	Number	Rate	Number	Rate
Brightspeed	0	0.0%	0	0.0%	0	0.0%
Frontier Commonwealth	0	0.0%	2	100.0%	0	0.0%
Verizon North	0	0.0%	0	0.0%	0	0.0%
Verizon PA	4	57.1%	1	14.3%	2	33.3%
Windstream	0	0.0%	0	0.0%	0	0.0%
Total	4		3		2	
Industry Average		36.4%		27.3%		25.0%

PAR Response Time

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

**2021-23 Average Response Time to BCS
Residential Payment Arrangement Requests (PARs)
Major Local Telecommunications Utilities**

Utility	Number of Days		
	2021	2022	2023
Brightspeed	26.0	0.0	28.0
Frontier Commonwealth	13.0	8.0	0.0
Verizon North	0.0	0.0	0.0
Verizon PA	10.1	11.3	15.7
Windstream	8.0	18.5	20.0
Industry Average	13.1	9.6	17.8

Termination of Service

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

Previously the termination rate for the telecommunications industry was calculated in the UCARE reports as the number of terminations per 1,000 residential customers; however, the termination rate for the telecommunications industry is now being calculated consistent with the other industries as defined below. The 2021-2023 termination rates have been updated in the table below.

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

Residential Service Terminations/Termination Rates Major Local Telecommunications Utilities

Utility	Residential Service Terminations			Termination Rates		
	2021	2022	2023	2021	2022	2023
Brightspeed	3,912	4,308	4,920	4.15	5.24	6.64
Frontier Commonwealth	1,548	1,152	1,212	2.28	1.82	2.06
Verizon North	2,316	1,332	1,092	2.57	1.67	1.54
Verizon PA	13,536	7,308	6,204	3.16	1.96	1.87
Windstream	2,592	3,192	3,180	3.31	4.25	4.20
Total	23,904	17,292	16,608			
Industry Average				3.15	2.57	2.72

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 an 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 2021 through 2023 as of July 25, 2024. The Infraction Category tables present detailed information about the infractions identified in 2023 complaints to the BCS.

The infraction rate is the number of informally verified infractions per 1,000 residential customers. Dividing per 1,000 customers normalizes the data for comparison purposes. The infraction rate is not a percentage. [Appendix B-2](#) provides a list of the infractions included in each infraction category.

Commission Infraction Rates Major Local Telecommunications Utilities

Utility	2021	2022	2023
Brightspeed	3.26	2.08	0.81
Frontier Commonwealth	4.06	6.77	3.90
Verizon North	1.37	0.65	0.27
Verizon PA	2.12	2.89	1.20
Windstream	2.02	1.16	0.58

2023 Number and Percent of Major Local Telecommunications Utility Infractions

Category	Brightspeed	Frontier Commonwealth	Verizon North	Verizon PA	Windstream	Telecommunications Industry
Broadband	0	1	0	2	0	3
	0%	<1%	0%	1%	0%	<1%
Network Modernization Plans	0	23	2	5	4	34
	0%	10%	11%	1%	9%	6%
Complaint Procedures	15	23	2	88	6	134
	25%	10%	11%	22%	14%	16%
Quality of Service	2	14	1	15	3	35
	3%	6%	5%	4%	7%	5%
Service Records	8	4	3	69	1	85
	13%	2%	16%	17%	2%	10%
Customer Trouble Reports	13	127	4	128	14	286
	22%	55%	21%	32%	32%	32%
Installation of Service	0	0	0	0	0	0
	0%	0%	0%	0%	0%	0%
Migration	0	0	0	0	0	0
	0%	0%	0%	0%	0%	0%
Billing and Payment	2	0	0	3	1	6
	3%	0%	0%	1%	2%	1%
Slamming and Cramming	0	0	0	0	1	1
	0%	0%	0%	0%	2%	<1%
Credit and Deposits	0	0	0	0	0	0
	0%	0%	0%	0%	0%	0%
Suspension and Termination	0	0	0	1	0	1
	0%	0%	0%	<1%	0%	<1%
Dispute Procedures	5	5	2	39	6	57
	8%	2%	11%	10%	14%	9%
Other	15	32	5	47	8	107
	25%	14%	26%	12%	18%	19%
Total	60	229	19	397	44	749

Universal Service Programs

As part of its ongoing responsibilities, BCS monitors the universal service programs of local telecommunications companies and ETCs. For the telecommunications industry, universal service programs¹⁸ include Lifeline Service (Lifeline),¹⁹ Lifeline 100 Service (Lifeline 100)²⁰ through Verizon PA and Verizon North and the Verizon PA Universal Telephone Assistance Program (UTAP). These programs ensure that low-income consumers have access to telecommunications service by providing discounts or credits for telecommunications service. The Commission approved the implementation of Pennsylvania's first universal service program for local telecommunications companies in 1989.²¹ 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.²² 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)²³ to implement the Lifeline provisions contained in Chapter 30. Under these provisions,²⁴ 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).²⁵ 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.²⁶

On March 2, 2012, the FCC issued a Final Rule²⁷ 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

¹⁸ With the exception of UTAP, these programs are supported fully or in part by federal universal service funds.

¹⁹ Lifeline f/k/a/ Lifeline 135 in previous UCARE reports.

²⁰ Lifeline 100 f/k/a Lifeline in previous UCARE reports.

²¹ The Link-Up America Program was the first universal service program. The FCC eliminated this program in 2012.

²² [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.](#)

²³ 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.

²⁴ 66 Pa.C.S. § 3019 (f)(1-4)

²⁵ Docket No. [M-2010-2164741](#), July 29, 2010, which codifies the guidelines at 52 Pa. Code § 69.2501.

²⁶ 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.

²⁷ 47 C.F.R. Part 54 – Universal Service

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

The Commission’s Nov. 9, 2016, Order at Docket No. [M-2016-2566383](#) adopted the eligibility criteria from the [FCC’s Lifeline and Link Up Reform and Modernization, Third Report and Order \(2016 Order\), WC Docket No. 11-42 released Apr. 27, 2016. Effective Dec. 2, 2016](#), eligibility for Lifeline support was streamlined to include the following programs: Supplemental Nutrition Assistance Program (SNAP), Medicaid, Supplemental Security Insurance (SSI), Federal Public Housing Assistance and Veterans Pension Benefits. The income-based eligibility (135% of Federal Poverty Guidelines) did not change. The Commission’s order required ETCs designated by the Commission to adhere to all federal ETC rules, regulations and standards including: (1) broadband as a supported service; (2) minimum service standards for broadband; (3) mobile voice and mobile broadband access services;²⁸ (4) the establishment of a National Verifier; and (5) port freeze rules.²⁹ Port freeze rules were eliminated in a subsequent Lifeline order.

Currently Lifeline is offered by ILECs, CLECs, and certain wireless, cable and satellite companies. As of Dec. 31, 2023, there were 349,021 low-income Pennsylvania consumers enrolled in Lifeline. Wireless, cable, fiber, and satellite ETCs provided Lifeline service to 342,075 of those consumers. The vast majority of Lifeline participants (341,869) in Pennsylvania chose a wireless ETC to provide their service. The following table shows enrollment activity for the major telecommunications utilities’ Lifeline programs in 2021, 2022 and 2023. Information regarding total Lifeline enrollment can be found in the Lifeline Tracking Report.

2021-23 Lifeline Service Activity

Utility	Total Number of Customers Who Received Lifeline Service			Total Number of Customers Enrolled as of December		
	2021	2022	2023	2021	2022	2023
Brightspeed	502	445	391	412	369	338
Frontier Commonwealth	602	558	468	528	447	376
Verizon North*	1,374	1,186	1,012	800	668	555
Verizon PA*	7,542	6,532	5,326	6,017	4,944	4,174
Windstream	1,204	1,189	1,189	941	867	727
Total	11,224	9,910	8,386	8,698	7,295	6,170

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

As of Dec. 1, 2023, 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, 2023, the minimum broadband standard for Lifeline subscribers who receive wireline service is 25 Mbps download and 3 Mbps upload, with a minimum of 1,280 GB of usage each month. If the

²⁸ 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.

²⁹ 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.

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

Universal Telephone Assistance Program

Verizon PA implemented UTAP along with its Lifeline service program as part of a settlement agreement that was approved by the Commission Aug. 4, 1995 ([P-00930715](#), [P-00950958](#)). Verizon PA is the only utility that offers a financial assistance program that helps existing Lifeline 100 customers and qualified Lifeline 100 applicants (with a pre-existing basic service arrearage) to restore their basic telecommunications service. The Dollar Energy Fund manages UTAP and distributes funds to qualified customers and Lifeline applicants. The following table shows the number of customers enrolled in the Verizon PA Lifeline 100 program and the UTAP grants provided in 2021, 2022 and 2023.

2021-23 Verizon PA Lifeline 100 and UTAP Summary

	2021	2022	2023
Total Number of Customers Enrolled in Lifeline 100 as of December	2,446	2,282	2,772
Number of Customers Given UTAP Assistance	0	0	0
Total Amount of UTAP Funds Distributed	\$0	\$0	\$0
Average Grant Amount	\$0	\$0	\$0

Automatic Notification Program

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

ETC Designation

In its 2005 First Universal Service Report and Order, the FCC established minimum requirements for telecommunications carriers to be designated as ETCs and encouraged states that exercise jurisdiction over ETC designation to adopt the same requirements.³⁰ 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 reimbursement for Lifeline from the Federal USF but did not make the utility eligible for USF high-cost

³⁰ See Matter of [Federal-State Joint Board of Universal Service, First Report and Order, CC Docket No. 96-45, 20 FCC Rcd 6371](#) (released March 17, 2005).

support.³¹ 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.³² On Dec. 22, 2010, Virgin Mobile USA, LP became the first wireless ETC designated by the PA PUC.

Non-Traditional ETC Designation

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

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

To be eligible to receive support from both Auction 903 and Auction 904, each of the winning bidders must be designated as an ETC in Pennsylvania. The following table shows the ETCs approved to operate in PA as of Dec. 31, 2023.

³¹ See [TracFone ETC Designation Order, CC Docket No. 96-45, Order, 23 FCC Rcd 6206](#) (released April 11, 2008).

³² See 66 Pa.C.S. § 3019(f)

2023 PA Wireless and Non-Traditional ETCs

Utility	PUC Docket #	Date of ETC Designation
Airvoice Wireless d/b/a Feel Safe Wireless	P-2013-2379431	7/9/2014
American Broadband d/b/a American Assistance	P-2013-2362571	11/5/2015
AmeriMex d/b/a Safety Net Wireless	P-2013-2369557	3/6/2014
Boomerang Wireless d/b/a enTouch Wireless	P-2014-2421056	9/1/2016
Centre WISP	P-2021-3023605	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
IM Telecom, LLC, d/b/a Infiniti Mobile	P-2016-2531610	6/15/2023
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-2013-2395687	1/15/2015
Tag Mobile	P-2011-2241542	12/5/2012
Telrite Corp d/b/a Life Wireless	P-2011-2234287	9/26/2013
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.

National Lifeline Verifier

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

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

for Lifeline through the ETC of their choice, submitting the Universal Lifeline Application and Household Worksheet by mail or by applying through the consumer portal at checklifeline.org.

Chapter 30 Broadband

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

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

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

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

Many of the telecommunication complaints that BCS receives, also include issues with broadband speed and/or availability. The following table shows the total number of residential telecommunications informal complaints in 2021, 2022 and 2023 for each of the five major telecommunications utilities, compared to the number of complaints that included a dispute regarding broadband speed, access or availability. Overall, in 2023, 26% of the residential informal complaints for the major telecommunications utilities included a dispute regarding broadband speed, access, or availability, compared to 27% in 2021.

2021-23 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		
	2021	2022	2023	2021	2022	2023	2021	2022	2023
Brightspeed	178	132	88	55	54	21	31%	41%	24%
Frontier Commonwealth	122	228	248	54	106	109	44%	46%	44%
Verizon North	70	29	35	26	7	8	37%	24%	23%
Verizon PA	951	593	519	217	111	87	23%	19%	17%
Windstream	111	91	93	35	41	29	32%	45%	31%
Total	1,432	1,073	983	387	319	254	27%	30%	26%

Telecommunications Industry Chapter Summary

From 2021 to 2023, the major local telecommunications utilities that participate in the warm transfer process received -66.3% less **Warm Transfers Completed**, from 178 in 2021 to 60 in 2023, which were 12% and 7% of the total number of complaints, respectively.

The overall industry residential **Total Complaint Number** for the major telecommunications utilities decreased from 1,984 in 2021 to 1,412 in 2023 (-28.8% lower) and was less than the pre-pandemic year of 2019. Likewise, the **Total Complaint Rate** decreased from 2.61 in 2021 to 2.31 in 2023 but was higher than the 2019 rate.

The total number **Consumer Complaints** from residential telecommunications consumers decreased from 1,566 in 2021 to 1,077 in 2023 (-31.2% lower) and was less than the pre-pandemic year of 2019 with 1,279.

Unsatisfactory Service was the top **Consumer Complaint Category** for the major telecommunications utilities for 2023, which accounted for 82% of the total of the 826 Consumer Complaints evaluated. The telecommunications utility with the most unsatisfactory service complaints was Verizon PA with 345, which was 81% of Verizon PA's evaluated Consumer Complaints.

The **Consumer Complaint Number** for the major telecommunications utilities decreased by -31.4% from 1,421 in 2021 to 975 in 2023. However, the **Consumer Complaint Rate** increased from 1.61 in 2021 to 1.73 in 2023.

From 2021 to 2023, the **Justified Consumer Complaint Rate** for Frontier Commonwealth increased, while the rates decreased for Brightspeed, Verizon North, Verizon PA and Windstream. Frontier Commonwealth's justified rate of 2.86 was higher than the industry average of 0.93. The industry average for the **Percent of Justified Consumer Complaints** declined from 54.8% in 2021 to 47.6% in 2023.

Windstream had the shortest **Consumer Complaint Response Time** in 2023, taking 14.7 days to respond, while Brightspeed took the most time to respond, with 25.7 days.

The total number of **PARs** from residential telecommunications consumers decreased from 13 in 2021 to 11 in 2023 (-15.4% less) and was less than the pre-pandemic year of 2019 with 23.

The **PAR Number** for the major telecommunications utilities decreased by -27.3% from 11 in 2021 to eight in 2023. The **PAR Rate** remained stable at 0.01 in 2021 and 2023.

From 2021 to 2023, all of the **Justified PAR Rates** remained stable at 0.00. The 2023 justified PAR rate for Verizon PA of 0.01 was greater than the 2023 industry average of 0.00. The industry average for the **Percent of Justified PARs** dropped from 36.4% in 2021 to 25.0% in 2023.

There was a wide range of **PAR Response Times** among the major telecommunications utilities who had PARs in 2023, from a low of 15.7 days for Verizon PA to a high of 28.0 days for Brightspeed.

Overall, the number of residential service **Terminations** decreased from 23,904 in 2021 compared to 16,608 in 2023, by -30.5%.

The industry average for the **Infraction Category** of Customer Trouble Reports (32%) had the highest percentage in 2023. The major telecommunications utility with the most Customer Trouble Reports infractions was Verizon PA with 128, which was 32% of Verizon PA's infractions.

The total number of customers who received **Lifeline Service** decreased by -25.3%, from 11,224 in 2021 to 8,386 in 2023. Likewise, the total number of customers enrolled as of December fell from 8,698 in 2021 to 6,170 in 2023.

The total number of customers enrolled in **Lifeline 100** as of December increased by 13.3%, from 2,446 in 2021 to 2,772 in 2023. No customers were given **UTAP Assistance** in 2021 or 2023.

From 2021 to 2023, the major telecommunications utilities received -34.4% fewer **Complaints with a Broadband Component**, from 387 in 2021 to 254 in 2023, which were 27% and 26% of the total number of complaints, respectively.

9. Non-Major Utilities

Electric and Natural Gas Supplier Activity

Deregulation of the electric and natural gas supply industries occurred in Pennsylvania through the passage of the Electricity Generation Customer Choice and Competition Act in 1996 and the Natural Gas Choice and Competition Act in 1999. Prior to the enactment of these laws, customers in Pennsylvania procured their electricity and/or natural gas from utility companies that generated, transmitted and distributed the energy to the customer. Under energy competition, consumers in Pennsylvania have the choice to purchase electricity and/or natural gas from a supplier that is a different company than the utility; thereby allowing the consumer to choose their energy supply based on several factors, including price, or in the case of electricity, by the source of the power supplied to the customer. Currently, Pennsylvania has a robust competitive energy supply market, with over 450 electric generation suppliers and over 340 natural gas suppliers licensed with the Commission. In 2023, on average, over 1.5 million residential electric customers and over 400,000 natural gas customers were served by competitive suppliers.

As indicated in the following table, in 2023 BCS received 2,169 contacts related to competitive supplier issues in the energy industries.

All Competition-Related Contacts by Industry 2021-23

Industry	2021	2022	2023
Electric	1,954	2,465	1,822
Gas	294	380	347
Total	2,248	2,845	2,169

Of the 2,169 total contacts received about competitive supplier issues in 2023, 880 or 41% 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 Consumer Complaints and PARs received by BCS.

Slamming Consumer Complaints and PARs by Industry 2021-23

Industry	2021		2022		2023	
	Residential	Commercial	Residential	Commercial	Residential	Commercial
Electric	533	60	654	93	566	125
Gas	87	7	106	13	101	13
Total	620	67	760	106	667	138

There were 805 cases about slamming in 2023. Residential consumers filed 667 complaints or 83%, commercial consumers filed the remaining 138 or 17% of slamming cases. Of the residential slamming cases, 566 were from the electric industry and 101 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.³³

[Appendix C-1](#) identifies the types of competition complaints tracked by BCS. In addition to slamming, bill disputes are prevalent among competition complaints to BCS.

Residential Informal Complaints for Non-Major Utilities

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

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

In 2023, BCS observed an increase in the number of residential Consumer Complaints for the non-major electric and gas utilities when compared with 2021, while the non-major water and telecommunications utilities decreased.

Residential Consumer Complaints for Non-Major Utilities by Industry 2021-23

Industry	2021	2022	2023
Electric	1,028	1,522	1,265
Gas	228	297	264
Water	22	13	15
Telecommunications	145	139	102
Total	1,423	1,971	1,646

³³ [L-00970121](#), Public Meeting of May 21, 1998

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:

- 81% of non-major electric utility complaints
- 73% of non-major gas utility complaints
- 53% of non-major water utility complaints
- 13% of non-major telecommunications utility complaints

The following tables present a summary of the 2023 residential informal complaints (Consumer Complaints and PARs) that are not included in the analysis within the electric, gas, water and telecommunications chapters. The tables list the non-major utilities for the electric distributors (EDCs), electric suppliers (EGSs), natural gas distributors (NGDCs), natural gas suppliers (NGS), water private (WP), water municipal (WM), and providers of telecommunications services (ILECs, CLECs, ETCs and VOIP).

The Number of Complaints column includes complaints where the non-major utility is listed as the primary utility on the residential complaint. The Total Number of Complaints column includes residential complaints where the non-major utility is listed as either the primary or secondary utility. Only those non-major utilities with five or more residential complaints are listed individually. Non-major utilities with less than five residential complaints are included in the appropriate general industry category (e.g., “Other Electric Distribution Companies” or “Other CLECs,” etc.). The last table lists the names of the non-major utilities with less than five residential complaints.

Suppliers vary in size and the data for the number of customers isn’t available to BCS, so a high number of complaints may occur for a supplier with a higher number of customers but isn’t necessarily indicative of a non-compliance issue.

**2023 Residential Informal Complaints
(Consumer Complaints and PARs)
for Non-Major Utilities**

Utility	Number of Complaints	Total Number of Complaints Includes Secondary Utility Complaints
ELECTRIC		
Citizens Electric Co. of Lewisburg (EDC)	15	15
Pike County Light and Power (EDC)	12	13
Other Electric Distribution Companies (EDCs)	7	7
4 Choice Energy (EGS)	15	16
AEP Energy (EGS)	13	15
All American Power & Gas (EGS)	19	19
Ambit Energy (EGS)	14	16
American Power & Gas of PA (EGS)	35	44
AP Gas and Electric d/b/a APG&E (EGS)	38	42
Better Buy Energy (EGS)	15	15
Cirro Energy (EGS)	10	14
City Power & Gas (EGS)	0	5
CleanChoice Energy f/k/a Ethical Electric (EGS)	61	79
Cleansky Energy f/k/a Titan Gas & Power (EGS)	79	93
Clearview Electric (EGS)	29	37
Constellation Energy Power Choice (EGS)	8	12
Discount Power (EGS)	10	11
Dynegy Energy Services (EGS)	5	6
Ecoplus Power (EGS)	7	7
Elec-Direct Energy Services (EGS)	40	60
Eligo Energy PA (EGS)	12	12
Energy Harbor f/k/a First Energy Solutions (EGS)	41	65
Energy Plus Holdings (EGS)	14	16
Frontier Utilities Northeast (EGS)	23	30
Great American Power (EGS)	0	6
Green Mountain Energy (EGS)	10	15
Greenlight Energy (EGS)	6	7
IDT Energy (EGS)	7	8
Indra Energy (EGS)	30	31

**2023 Residential Informal Complaints
(Consumer Complaints and PARs)
for Non-Major Utilities (continued)**

Utility	Number of Complaints	Total Number of Complaints Includes Secondary Utility Complaints
ELECTRIC (continued)		
Inspire Energy Holdings (EGS)	100	120
Interstate Gas Supply d/b/a IGS Energy (EGS)	50	58
Just Energy PA (EGS)	22	25
Major Energy Services (EGS)	31	36
Median Energy PA (EGS)	5	8
Mpower Energy NJ (EGS)	13	14
National Gas and Electric (EGS)	14	16
New Energy Ventured - Mid Atlantic (EGS)	16	27
New Wave Energy (EGS)	5	5
Nextera Energy Service PA (EGS)	25	33
Nordic Energy Services (EGS)	13	14
NRG Home (EGS)	104	125
Ntherm (EGS)	17	20
Park Power (EGS)	14	17
Pennsylvania Gas and Electric (EGS)	13	17
Pure Energy USA (EGS)	26	29
Residents Energy (EGS)	28	33
RPA Energy d/b/a Green Choice Energy (EGS)	5	7
Rushmore Energy (EGS)	0	8
Santanna Energy Services (EGS)	0	6
SFE Energy (EGS)	54	62
Shipley Oil (EGS)	0	6
Smart Touch Energy (EGS)	0	5
Smartenergy.com (EGS)	64	81
Spark Energy (EGS)	0	6
Spring Power & Gas (EGS)	15	16
Stream Energy (EGS)	9	14
Think Energy / Engie Retail (EGS)	19	19
Tomorrow Energy (EGS)	54	65

**2023 Residential Informal Complaints
(Consumer Complaints and PARs)
for Non-Major Utilities (continued)**

Utility	Number of Complaints	Total Number of Complaints Includes Secondary Utility Complaints
ELECTRIC (continued)		
Verde Energy USA (EGS)	35	43
Vista Energy Marketing (EGS)	5	7
Xoom Energy PA (EGS)	0	5
Other Electric Generation Suppliers (EGSs)	65	54
Total Non-Major Electric	1,396	1,717
GAS		
Peoples Gas Co. f/k/a Peoples TWP (NGDC)	133	133
Other Natural Gas Distribution Companies (NGDCs)	14	14
American Power & Gas of PA (NGS)	5	8
City Power & Gas (NGS)	6	6
Cleansky Energy f/k/a Titan Gas & Power (NGS)	8	9
Direct Energy Services (NGS)	0	8
Dominion Energy Solutions (NGS)	0	8
Energy Harbor (NGS)	0	7
IGS (Interstate Gas Supply) (NGS)	60	66
Indra Energy (NGS)	11	11
Inspire Energy Holdings (NGS)	8	8
Major Energy (NGS)	0	5
Mpower Energy NJ (NGS)	11	12
NRG Home (NGS)	21	24
Pennsylvania Energy	12	13
Residents Energy (NGS)	8	9
RPA Energy d/b/a Green Choice (NGS)	6	6
SFE Energy (NGS)	34	37
Tomorrow Energy (NGS)	17	18
Verde Energy USA PA (NGS)	6	8
Other Natural Gas Suppliers (NGSs)	48	45
Total Non-Major Gas	408	455

**2023 Residential Informal Complaints
(Consumer Complaints and PARs)
for Non-Major Utilities (continued)**

Utility	Number of Complaints	Total Number of Complaints Includes Secondary Utility Complaints
WATER		
Reynolds Water (WP)	7	
Other Private Water	18	
City of Lancaster (WM)	7	
Other Municipal Water	10	
Total Non-Major Water	42	
TELECOMMUNICATIONS		
Consolidated Communications (ILEC)	5	
Other Incumbent Local Exchange Carriers (ILECs)	9	
Clear Rate Communications (CLEC)	9	
Frontier Communications CTSI (CLEC)	11	
Windstream Communications (CLEC)	14	
Other Competitive Local Exchange Carriers (CLECs)	12	
Assurance Wireless (Virgin Mobile) (ETC)	11	
Comcast Digital (VOIP)	13	
Safelink Wireless (Tracfone) (ETC)	7	
Other Providers of Telecommunications Services	14	
Total Non-Major Telecommunications	105	

**2023 Residential Informal Complaints
(Consumer Complaints and PARs)
for Non-Major Utilities (continued)**

Non-Major Utilities with Less Than Five Residential Informal Complaints
ELECTRIC
<u>Other EDCs:</u> Borough of St. Clair and Wellsboro Electric
<u>Other EGSs:</u> Alpha Gas and Electric, Arcadia Power, Astral Energy, Atlantic Energy, Brighten Energy, Champion Energy Services, Choose Energy, Energy Rewards/Comcast/Everyday Energy, Engie Resources, Freepoint Energy Solutions, Gateway Energy, Liberty Power, North American Power & Gas, Phodes Energy, Power Management, Power Up Energy, Powervine Energy, Premier Energy, Public Power, Respond Power, SmartestEnergy, South Bay Energy, Starion Energy of PA, Statewise Energy, Summer Energy, Sunrise Power and Gas, Talen Energy f/k/a PPL Energy Plus, Town Square Energy East, Trieagle Energy, Viridian Energy, WGL Energy Services, and Yep Energy
GAS
<u>Other NGDCs:</u> Chartiers Natural Gas, Northeast Heat and Light, Pike County Light & Power, Riemer Natural Gas f/k/a Herman Riemer Gas Co. and Valley Energy f/k/a PA & Southern Gas
<u>Other NGSs:</u> Alpha Gas and Electric, Ambit Northeast, Atlantic Energy, Clearview Electric, Constellation Energy Gas Choice f/k/a MxEnergy, Discount Power, Energy Co-op Assn of PA d/b/a The Energy Co-op, Frontier Utilities Northeast, Grand Energy, Green Mountain Energy Co., Greenlight Energy, Median Energy, New Wave Energy, Nordic Energy Services, Novex Energy Solutions, Ntherm, Park Power, PA Gas & Electric, Rhoads Energy, Santanna Energy Services, Shipley Energy (Shipley Oil Service), Statewise Energy, UGI Energy Services-Energylink, Vista Anergy Marketing, and Xoom Energy PA
WATER
<u>Other Private Water:</u> Appalachian Utilities, Conneaut Lake Park, Emporium Water, Fryburg Water, Manwalamink Water, Pocono Water, Quentin Water, Springhouse Waterworks f/k/a Imperial Point, Tri Valley Water (Meadowcrest Estates), and Venango Water
<u>Other Municipal Water:</u> City of Bethlehem, City of Franklin, City of Lebanon, City of Lock Haven, City of Philadelphia, and Hanover Water Works
TELECOMMUNICATIONS
<u>Other ILECs:</u> Armstrong Telephone Co., North-Eastern PA Telephone, PA Telephone Co., TDS Telecom f/k/a Sugar Valley Telephone, and TDS Telecom (Mahanoy & Mahantango)
<u>Other CLECs:</u> Armstrong Telecommunications, AT&T Local, Atlantic Broadband, Lingo Communications f/k/a Birch Residential, RCN Telecom of PA, and Shentel Telecommunications
<u>Other Providers of Telecommunications Services:</u> Fastbridge Fiber (CAP), Qlink Wireless (ETC), Safety Net Wireless (Amerimex Wireless) (ETC), T-Mobile (Inreach) (ETC), Tag Mobile (ETC), Veolcity.net Communications (ETC), Viasat Carrier Services (ETC), and Zito Media Voice (ETC)

Glossary of Terms

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

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

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

Competitive Local Exchange Carrier (CLEC) – A telecommunications provider that competes with 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,³⁴ a percentage of the monthly bill,³⁵ or a monthly amount that is calculated upon a percentage of the household income.³⁶ 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

³⁴ Also referred to as "rate discount bill."

³⁵ Also referred to as "percent of bill."

³⁶ Also referred to as a "percent of income payment" (PIP).

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

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

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

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).

Inquiries – Contacts to BCS that did not require follow-up investigation beyond the initial contact or call-back.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Other Miscellaneous Reasons for Inquiries – This category includes, but is not limited to, contacts not requiring further investigation related to sales issues, Lifeline/Link-up, healthcare facilities, etc.

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

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

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

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

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

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

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

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

List of Acronyms

<u>Acronym</u>	<u>Definition</u>
ALCOSAN	Allegheny County Sanitary Authority
BCS	Bureau of Consumer Services
CAP	Customer Assistance Program
CARES	Customer Assistance and Referral Evaluation Services
CLEC	Competitive Local Exchange Carrier
COLR	Carrier of Last Resort
CRS	Collections Reporting System
CSIS	Consumer Services Information System
CTS	Compliance Tracking System
CURE	Customer & Utility Resolution Effort
d/b/a	Doing Business As
DHS	Department of Human Services
DSLPA	Discontinuance of Services to Leased Premises Act
EDC	Electric Distribution Company
EGS	Electric Generation Supplier
ETC	Eligible Telecommunications Carrier
FCC	Federal Communications Commission
f/k/a	Formerly Known As
FPIG	Federal Poverty Income Guidelines
H2O	Help to Others
ILEC	Incumbent Local Exchange Carrier
LEC	Local Exchange Carrier
LECRS	Local Exchange Carrier Reporting System
LIHWAP	Low Income Household Water Assistance Program
LIURP	Low-Income Usage Reduction Program
Mbps	Megabits per second
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
PIP	Percent of Income Payment
PUC	Public Utility Commission
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: Number of Residential Customers

2021-23 Number of Residential Customers Major Electric Distribution Companies

Utility	2021	2022	2023
Duquesne	543,300	545,897	548,072
Met-Ed	512,216	515,226	518,166
PECO+	1,530,346	1,538,908	1,548,540
Penelec	501,816	501,009	500,775
Penn Power	148,138	148,927	149,685
PPL	1,251,196	1,256,135	1,262,117
UGI-Electric	55,084	55,122	55,185
West Penn	632,415	631,990	632,879
Total	5,174,511	5,193,214	5,215,419

+ PECO statistics include electric and gas.

2021-23 Number of Residential Customers Major Natural Gas Distribution Companies

Utility	2021	2022	2023
Columbia	407,892	409,611	411,279
NFG	198,007	196,742	196,411
Peoples	593,089	594,250	594,658
PGW	488,817	487,335	483,705
UGI-Gas	611,631	618,589	624,914
Total	2,299,436	2,306,527	2,310,967

Appendix A (Continued)

2021-23 Number of Residential Customers Major Class A Water Utilities

Utility	2021	2022	2023
Aqua	409,411	412,598	415,431
PAWC	632,758	642,776	649,956
Large Class A Total	1,042,169	1,055,374	1,065,387
Audubon	2,687	2,695	2,655
Columbia	9,838	10,886	11,460
Community Utilities	2,647	2,651	2,657
Newtown Artesian	9,649	9,658	9,684
Veolia Bethel	2,450	2,452	2,453
Veolia PA	58,175	58,926	59,452
York	63,323	67,214	64,901
“Other Class A” Total	148,769	154,482	153,262
All Class A Total	1,190,938	1,209,856	1,218,649

2021-23 Number of Residential Customers Municipal Water and Sewer Utilities

Utility	2021	2022	2023
PWSA	97,915	99,183	100,986

2021-23 Number of Residential Customers Major Local Telecommunications Utilities

Utility	2021	2022	2023
Brightspeed	94,357	82,160	74,044
Frontier Commonwealth	68,032	63,202	58,713
Verizon North	90,239	79,746	70,921
Verizon PA	428,220	372,782	332,083
Windstream	78,396	75,044	75,650
Total	759,244	672,934	611,411

Appendix B-1: Categories of Infractions for Electric, Gas and Water

Billing and Payment – 52 Pa. Code Chapter 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 – 52 Pa. Code § 56.12(1)-(6)

Make-Up Bills – 52 Pa. Code § 56.14, 57.24, 59.22, and 65.9

Transfer of Accounts – 52 Pa. Code § 56.16, 56.36(b)(3), and 56.72

Credit Standards and Deposits – 52 Pa. Code § 56.31-35, 56.36(b)(1)-(2), 56.37, 56.38, 56.41, 56.42, 56.51, 56.53, and Title 66 § 1404

Termination Grounds – 52 Pa. Code § 56.2-Definition of Delinquent Acct. and 56.81-83

Termination Procedures – 52 Pa. Code § 55.104, 56.21(6), 56.91-97, 56.99, 56.100, 56.111, 56.112, 56.114, 56.335, 56.340, and Title 66 § 1406

Reconnection of Service – 52 Pa. Code § 56.115, 56.191(a)-(c), 56.421, and 1407

Liability - Responsibility for Bills – 52 Pa. Code § 56.2-Definition of Applicant, 56.2-Definition of Customer, 56.191(d)-(e), and 56.285

Landlord / Ratepayer – Title 66 § 1521-1533

Dispute Handling – 52 Pa. Code § 56.2-Definition of Dispute, 56.2-Definition of Initial Inquiry, 56.141-152, 56.181, 59.21(f)(1), 59.21(f)(3) and 65.3(a)

Other – 52 Pa. Code § 54.73, 56.1, 56.71, 56.202, 57.172, 57.174, 59.36, 62.4, 65.8, 75.37, 75.38, Title 66 § 1501 and Utility Tariffs

Appendix B-2: Categories of Infractions for Telecommunications

Broadband – Title 66 § 3012-Definition of Broadband

Network Modernization Plans – Title 66 § 3014

Complaint Procedures – 52 Pa. Code § 63.1, 63.15, and 63.59

Quality of Service – 52 Pa. Code § 63.14, 63.23, 63.53, and 63.63

Service Records – 52 Pa. Code § 63.22

Customer Trouble Reports – 52 Pa. Code § 63.24, 63.57, and 64.52

Installation of Service – 52 Pa. Code § 63.58

Migration – 52 Pa. Code § 63.201-221

Billing and Payment – 52 Pa. Code § 53.85, 64.1, 64.12-14, 64.16, 64.18-19, 64.24, and 64.53

Slamming and Cramming – 52 Pa. Code § 64.23

Credit and Deposits – 52 Pa. Code § 64.32-34 and 64.36

Suspension and Termination – 52 Pa. Code § 64.61, 64.63, 64.71-74, 64.81, 64.101, 64.102, 64.121-123, 64.133, and 64.181

Dispute Procedures – 52 Pa. Code § 64.2 Definition of Dispute, 64.141, 64.142, 64.153, 64.171, and 64.191

Other – Title 66 § 1501

Appendix C-1: Classification of Consumer Complaints for 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 C-2: Classification of Consumer Complaints for 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, 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.



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

