

**PENNSYLVANIA PUBLIC UTILITY COMMISSION**  
**Harrisburg, Pennsylvania 17120**

**PA Public Utility Commission et al.**  
**vs.**  
**Philadelphia Gas Works**

**Public Meeting of November 9, 2023**  
**3037933-OSA**  
**Docket No. R-2023-3037933**  
**C-2021-3029259 et al.**

**STATEMENT OF VICE CHAIR KIMBERLY BARROW**

The overall result of this rate case has many positive attributes and I commend the Administrative Law Judges (ALJs) and the Parties involved for litigating the issues to a full conclusion. This case has illuminated some issues that still warrant attention by Philadelphia Gas Works (PGW).

**Customer Service – Call Center Metrics**

PGW has been directed to submit a report to the Bureau of Consumer Services (BCS) outlining plans for improving customer satisfaction, as measured through call center metrics. Completion of this plan will be a condition in the next base rate case filed by PGW. To ensure successful implementation of the plan, I recommend that PGW informally report call center metrics to BCS staff during existing quarterly meetings between PGW and BCS. In particular, I request a close review of call center metrics comparing winter moratorium months (December through March) with statistics captured during months when terminations are permitted. BCS should consider including a short discussion of the results of this comparison in the Consumer Service Performance Report for 2024 and subsequent years, as appropriate.

**Customer Service – Quality Control Reviews**

PGW is also directed through this Order to review adverse decisions of the Commission on a quarterly basis. While this Order only requires a review of Initial Decisions, I believe that tracking trends in informal complaints would also be a worthwhile endeavor that could be tracked through call center system programming and quality control reviews of a representative sampling of complaints. The benefit of tracking trends from inception outweighs the costs of initiating the programming necessary to monitor these trends.

**Failure to Negotiate Payment Arrangements**

With respect to the assertion that PGW payment arrangements fail to consider the individual situation of payment troubled customers, I have concerns about the affordability of the utility's payment arrangements. While the Commission is constrained by the formulaic requirements of Chapter 14, my hope is that utilities use their ability to set more flexible payment terms that customers are able to pay, considering their individual circumstances. While a formulaic electronic system may be more efficient for PGW, it is not the most beneficial service for customers and my hope is that PGW takes this into consideration.

## **Closing of In-Person Customer Service Centers**

I find it particularly troubling that PGW has closed its in-person customer service centers, opting to move in-person payments to local retailers. In a large city like Philadelphia, in-person services are essential, as customers may need assistance that is not available via telephone or online services. I encourage PGW to work closely and form partnerships with local community groups to train their staff and provide avenues for direct access to PGW's customer service staff to assist customers to meet their specific individual needs.

## **Identification Requirements to Establish Service**

The practice of requesting two forms of identification from an applicant to establish service is contrary to Chapter 56 and produces barriers that can significantly slow down the process of obtaining essential utility service for certain individuals. Chapter 56 clearly articulates that applicants who provide one government-issued photo identification have satisfied the requirement to prove their identity.<sup>1</sup> There are other ways to confirm identification for the purpose of establishing service while protecting against fraud. Utilities have access to a number of public record resources to confirm identity that do not unnecessarily burden customers.

Finally, I note that this proceeding once again raises the issue of the correct forum for consideration of universal service programs. It is my hope that the Commission will undertake a holistic review of whether our currently bifurcated rate case and universal service proceedings are comprehensively and efficiently addressing this vital component of utility service.

**November 9, 2023**

**Date**

  
**Kimberly Barrow, Vice Chair**

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<sup>1</sup> 52 Pa. Code § 56.32(c).