



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE  
REFER TO OUR FILE

Docket Nos.  
M-2024-3046458  
(electricity)  
M-2024-3046459  
(natural gas)

**February 20, 2024**

TO ALL MAJOR ELECTRIC AND NATURAL GAS DISTRIBUTION COMPANIES  
REPORTING CUSTOMER SURVEY DATA FOR THE ANNUAL CUSTOMER  
SERVICE PERFORMANCE REPORT

Re: Commission Guidance on the Collection and Reporting of Uniform  
Customer Surveys pursuant to the requirements at 52 Pa. Code §§ 54.154  
and 62.34

With this Secretarial Letter, the Pennsylvania Public Utility Commission  
(Commission) provides guidance on the collection and reporting of customer service  
survey data pursuant to the requirements of 52 Pa. Code §§ 54.154 and 62.34.

**Background:**

The Electricity Generation Customer Choice and Competition Act<sup>1</sup> and the  
Natural Gas Choice and Competition Act<sup>2</sup> were promulgated, respectively, in 1996 and  
1999. Both acts require electric distribution companies (EDCs) and natural gas  
distribution companies (NGDCs) to maintain, at a minimum, the levels of customer  
service that existed prior to the effective dates of the acts.<sup>3</sup> To establish a means to  
monitor customer service, the Commission promulgated regulations for the EDCs<sup>4</sup> and  
NGDCs<sup>5</sup> that specify the information that must be reported to and analyzed by the  
Commission.

---

<sup>1</sup> 66 Pa. C.S. §§ 2801 – 2815, as amended.

<sup>2</sup> 66 Pa. C.S. §§ 2202 – 2212.

<sup>3</sup> 66 Pa. C.S. §§ 2206(a), 2807(d).

<sup>4</sup> See, *Reporting Requirements for Quality of Service Benchmarks and Standards*, effective July 11, 1998,  
28 Pa.B. 3283. Reporting began in 1999.

<sup>5</sup> See, *Reporting Requirements for Quality of Service Benchmarks and Standards*, effective December 9,  
2000, 30 Pa.B. 6346. Reporting began in 2001.

Among the data that must be submitted by the EDCs and NGDCs is information derived from surveys conducted of customers who have had recent customer-initiated contacts with the utilities. The purpose of the surveys is to assess customer perceptions regarding the most recent interaction with the EDC or NGDC. In accordance with 52 Pa. Code §§ 54.154(a)(1), 62.34(1), the survey questions shall measure access to the utility, employee courtesy, employee knowledge, promptness of the utility's response or visit, timeliness of the utility's response or visit and satisfaction with the handling of the interaction. Customer survey data is due annually to the Commission by April 1. NGDCs serving fewer than 100,000 residential accounts adhere to different customer survey requirements, as specified in 52 Pa. Code § 62.35, and must report customer survey data to the Commission by March 1. The customer survey data, along with specific utility performance data, is published annually by the Commission in the Customer Service Performance Report. The report presents quality of service data for the major EDCs<sup>6</sup> and the major NGDCs<sup>7</sup>.

### **Uniform Data Collection and Reporting:**

Pursuant to the requirements at 52 Pa. Code § 54.154(3) and § 62.34(3), the EDCs and NGDCs, respectively, are required to carry out the customer survey process using instruments and procedures that provide the Commission with uniform data that can be used to directly compare customer service performance among the EDCs and NGDCs. Customer survey work may be conducted by the utility directly or through an independent third-party. The selection of a vendor to conduct the customer survey work must support and uphold the Commission's contracting recommendations, which encourage major EDCs and NGDCs to incorporate diversity in the procurement of goods and services, as provided in the Commission's Diversity Policy Statement at 52 Pa. Code §§ 69.801 —69.809.

The following procedures are presented in this Secretarial Letter to ensure the consistency and integrity of customer survey data reported to the Commission by the major EDCs and NGDCs, or if applicable, an independent third-party. Deviations to the protocols contained in this Secretarial Letter will be considered by the Commission on a case-by-case basis.

---

<sup>6</sup> Duquesne Light Co. (Duquesne); PPL Electric Utilities Corporation (PPL); PECO Energy Co. (PECO); UGI Utilities Inc. (UGI-Electric); and the FirstEnergy companies – Metropolitan Edison Co. (Met-Ed), Pennsylvania Electric Co. (Penelec), Pennsylvania Power Co. (Penn Power) and West Penn Power Co. (West Penn).

<sup>7</sup> Columbia Gas of Pennsylvania Inc. (Columbia); National Fuel Gas Co. (NFG); Peoples – Equitable Division (Peoples-Equitable); Peoples Natural Gas Co. (Peoples) (See page 3, Treatment of Peoples Companies); Philadelphia Gas Works (PGW); UGI Penn Natural; and UGI Utilities Inc. (UGI-Gas) (See page 3, Treatment of PECO Energy).

**Survey Instrumentation:** A common survey must be used among the EDCs and NGDCs that includes interaction categories pursuant to the requirements of 52 Pa Code §§ 54.154(a)(2) and 62.34(2). The survey is subject to Commission approval and must include closed-ended questions where the customer is asked to rate the performance of the EDC or NGDC based on a scale of 1 to 10, with 10 being the most desirable response. Options allowing the individual to respond “Don’t Know” or “Refused” shall be included in the survey questionnaire, however, responses using these categories shall be removed from the base when calculating average scores, where appropriate. At the discretion of the utility, additional survey questions may be included but responses to those questions should not be reported to the Commission.

**Case Selection:** A customer or consumer being surveyed shall be contacted within 30 days of the date that the interaction with the utility took place. Individuals who were surveyed on behalf of the utility within the last year or are employed by the utility or have a household member employed by the utility within the past two years are not eligible to complete the survey.

**Sampling Procedures:** Each month, each utility must randomly select consumers who have contacted the utility within the past 30 days and transmit this list to a third-party for completion of survey work. Alternatively, utilities that plan to conduct customer surveys may use the list to initiate survey work. The third-party or the utility must remove any duplicate contacts in the survey sample as well as remove any contacts that appear on the utility’s “Do Not Call or Contact” lists or who were surveyed within the past 365 days. Transactions with consumers who use a utility’s automated telephone system exclusively, as well as those who contact their utility by personal visit, are eligible to be surveyed; however, the survey sample must exclude all transactions that result from company outbound calling programs or other correspondence.

Pursuant to the requirements at 52 Pa Code §§ 54.154(5) and 62.34(5), the sampling plan used by each utility or third-party shall be designed so that the results are statistically valid within plus or minus 5%. In adherence to this requirement, 700 surveys for each EDC or NGDC must be completed annually. The 700 completed surveys should include 200 contacts about credit and collection issues and 500 contacts about all other types of issues. The focus of the surveys should be on residential and small business customers or consumers who have recently contacted the utility.

Surveys must be completed evenly over the year to ensure results reflect both short-term and longer-term service issues. Accordingly, approximately 58-59 customer surveys must be completed per month.

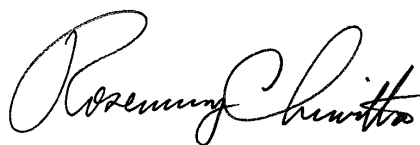
**Methods of Conducting Surveys:** A utility or a third-party shall conduct the survey by contacting the consumer by telephone. After three attempts to contact the consumer have been made and those efforts are unsuccessful, the survey can be distributed to the

consumer by electronic mail if the consumer has affirmatively consented to that method of communication delivery.

**Analysis and Reporting of Results:** Pursuant to the requirements at 52 Pa. Code §§ 54.154(c)(3) and 62.34(7)(iv), each annual report shall contain results reported by month as well as cumulative 12-month results. Survey results shall be tabulated in whole numbers and percentages for each question posed in the survey and shall be organized and presented according to the categories of “All Transactions,” “Credit and Collections” and “Non-Credit and Collections.” The data shall be submitted to the Commission in an Excel spreadsheet and in a PDF file.

Questions regarding this Secretarial Letter may be directed to Michele Tate, Bureau of Consumer Services, at 717-787-5155, [mtate@pa.gov](mailto:mtate@pa.gov) for technical or operational issues or Kriss E. Brown at [kribrown@pa.gov](mailto:kribrown@pa.gov) for legal or procedural issues.

Sincerely,

A handwritten signature in black ink, appearing to read "Rosemary Chiavetta". The signature is fluid and cursive, with the first name being more prominent.

Rosemary Chiavetta  
Secretary

cc: Kriss E. Brown, Deputy Chief Counsel, Law Bureau  
Lori Mohr, Director, Bureau of Consumer Services  
Matt Hrivnak, Chief, Policy Division, Bureau of Consumer Services  
Michele Tate, CRP Unit, Bureau of Consumer Services  
Sarah Dewey, Tracking and Quality Assurance, Bureau of Consumer Services