



# 2018

## Utility Consumer Activities Report and Evaluation

Pennsylvania Public Utility Commission





# Utility Consumer Activities Report and Evaluation 2018

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Bureau of Consumer Services  
Alexis Bechtel, Director



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# 1. Consumer Contacts to the Bureau of Consumer Services

The Pennsylvania Public Utility Commission's Bureau of Consumer Services (BCS) prepared the annual assessment of the major utilities in the 2018 Utility Consumer Activities Report and Evaluation (UCARE). As in past years, this comprehensive report is developed using information collected from informal complaints received by the BCS for the electric, gas, water and telephone industries. As noted throughout the report, some of the data is based on a statistically valid sampling of the informal complaints. The report has been prepared to meet the statutory reporting requirement of 66 Pa. Code § 308(d) and to communicate to the public and the utility industry how jurisdictional utilities performed relative to informal complaint activity in 2018.

BCS began investigating and writing decisions on utility consumer complaints and service termination cases in April 1977. Since then, BCS has investigated 2,178,030 cases, which include consumer complaints and payment arrangement requests (PARs), and has received 1,702,497 opinions and requests for information (inquiries). In 2018, BCS received 141,985 contacts by consumers including 64,668 contacts that required investigation. It is important to note that BCS determined 86 percent of the 2018 customer complaints investigated and reviewed had been appropriately handled by the subject utilities before the customers brought them to the PUC.

## Case Handling

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

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

## Consumer Feedback Survey

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

## Consumer Rating of BCS Service

How would you rate the service you received from the PUC (BCS)?	2016	2017	2018
Excellent	62%	56%	54%
Good	18%	20%	22%
Fair	11%	12%	13%
Poor	9%	12%	12%

According to the survey results, 76 percent of consumers who contacted BCS in 2018 rated the BCS’s service as “excellent” or “good.” Appendix A presents more information about how consumers rated the service they received from BCS in 2016, 2017 and 2018. BCS management frequently reviews the findings of the consumer feedback survey and promptly investigates any negative trends to improve staff performance and ultimately customer service.

### Databases

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

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

### Distinctions Among Cases

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

Commercial customer contacts were also removed from the data used in the analysis. Although BCS’s regulatory authority has largely been confined to residential accounts, the Bureau handled 1,179 cases from commercial customers in 2018. Of these cases, 314 were related to loss of utility service, while the remaining 865 were consumer complaints.

With respect to the 314 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. Instead, Bureau investigators give commercial customers information regarding the company position or attempt to mediate a mutually acceptable agreement regarding the disputed matter. Many such cases are referred to the Office of Administrative Law Judge’s Mediation Unit for Alternative Dispute Resolution where an attempt is made to mediate a resolution between the utility and its customer.

The following table shows the vast majority of cases handled by BCS in 2018 involved residential utility service. Appendix B presents a comparison of the number of residential and commercial consumer complaints and PARs for 2017 and 2018.

### Total Volume of Consumer Complaints and Payment Arrangement Requests (PARs) to BCS in 2018\*

Industry	Consumer Complaints		Payment Arrangement Requests	
	Residential	Commercial**	Residential	Commercial**
Electric	9,116	442	31,299	149
Gas	2,706	129	12,912	125
Water	1,334	95	4,145	40
Telephone	1,754	190	36	0
Other***	96	9	91	0
<b>Total</b>	<b>15,006</b>	<b>865</b>	<b>48,483</b>	<b>314</b>

\* This chart represents “investigated cases” only, and not those cases handled on the first call.

\*\* All cases that involved commercial accounts were deleted from the analyses in the subsequent chapters.

\*\*\* Sewer and steam heat complaints are designated as “other” in this table and the tables that follow.

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

### Consumer Complaints

Most consumer complaints regarding the electric, gas, water, sewer and steam heat industries deal with matters covered under 52 Pa. Code, Chapter 56, Standards and Billing Practices for Residential Utility Service and/or Chapter 14 of the Public Utility Code, the Responsible Utility Customer Protection Act. For the telephone industry, most of the cases found in the consumer complaint category deal with matters covered by Chapter 30 of the Public Utility Code, Alternative Form of Regulation of Telecommunications Services, 52 Pa. Code, Chapter 64 Standards and Billing Practices for Residential Telephone Service and/or 52 Pa. Code, Chapter 63 Telephone Service. For the most part, consumer complaints represent those customers who

contacted the Commission due to the inability of the utility and the customer to reach a mutually satisfactory resolution to a dispute.

### Consumer Complaints by Industry\* 2016-18

Industry	2016	2017	2018	% Change 2016-18
Electric	6,295	8,462	9,558	52%
Gas	1,655	2,253	2,835	71%
Water	753	922	1,429	90%
Telephone	1,662	1,577	1,944	17%
Other	3	1	105	n/a**
<b>Total</b>	<b>10,368</b>	<b>13,215</b>	<b>15,871</b>	<b>53%</b>

\* Table includes both residential and commercial consumer complaints.

\*\* For the other industry, 95 of the 105 consumer complaints in 2018 were sewer-related complaints for Pittsburgh Water & Sewer Authority (PWSA), which came under PUC’s regulatory authority Apr. 1, 2018, while the remaining 10 consumer complaints were for other companies. Without PWSA, the 2016-18 percent change would be 233 percent; however, with the addition of PWSA, the 2016-18 percent change is 3,400 percent.

Electric and gas utilities accounted for 60 percent and 18 percent, respectively, of all consumer complaints investigated by BCS in 2018. Water utilities accounted for 9 percent, while telephone utilities were the subject of 12 percent.

### Justified Consumer Complaints

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

### Classification of Consumer Complaints

BCS has categorized the 2018 residential complaints into 14 categories for each of the electric, gas and water utilities and into 11 categories for each of the telephone utilities. The tables that show the percent of complaints in each category in 2018 appear in each industry chapter. The percentages shown in the tables are for all of the cases that residential consumers filed with BCS that were evaluated, not just the cases that are determined to be justified in coming to BCS. BCS analyzes the categories that generate complaints or problems for customers, even if the utility records indicate that the utility followed Commission procedures and guidelines in handling the complaint. BCS often discusses its findings with individual utilities so they can use the information to review their complaint-handling procedures in categories that seem to produce large

numbers of consumer complaints to the Commission. The four tables in Appendix E show the actual number of cases in each category in 2018.

## Payment Arrangement Requests

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

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

All of the measures pertaining to PARs are based on assessments of contacts to BCS from individual customers. As with consumer complaints, almost all customers had already contacted the utility prior to contacting BCS. During 2018, BCS handled 48,797 PARs from customers of the utilities under the Commission's jurisdiction.

Act 201 of 2004 amended Title 66 of the Public Utility Code by adding Chapter 14, the Responsible Utility Customer Protection Act, which changed the rules for terminations, reconnections and PARs. On June 9, 2011, the Commission adopted a final rulemaking order incorporating Chapter 14 into Chapter 56 of its regulations. The Independent Regulatory Review Commission (IRRC) approved these regulations on July 21, 2011. The revised Chapter 56 regulations have been in effect since Oct. 8, 2011. The law sets forth limits within which the Commission can establish payment arrangements between a public utility, customers and applicants. In addition to establishing the length of payment arrangements, Chapter 14 prohibits the Commission from establishing a second or subsequent payment arrangement, absent a decrease in income, if a customer has defaulted on a previous payment arrangement. Chapter 14 also prohibits the Commission from issuing payment arrangements involving customer assistance program arrearages.

On Oct. 22, 2014, Governor Corbett signed House Bill 939, also known as Act 155 of 2014, which among other things, reauthorized Chapter 14 for another ten years. In addition to reauthorizing Chapter 14, the General Assembly revised the law in a number of areas, including:

- Expanding the scope of the law to cover small gas companies, steam heating and wastewater utilities.
- Prohibiting termination of utility service on Fridays.
- Allowing physician assistants, along with physicians and nurse practitioners, to file medical certificates.
- Allowing all customers and applicants to pay security deposits in installments over 90 days. CAP-eligible customers are exempt from security deposit requirements.
- New utility reporting requirements concerning the use of medical certificates and high-arrearage accounts.
- A five-year PUC reporting requirement (due in December of years 2019 and 2024) on the implementation and impact of Chapter 14.

The re-authorized law went into effect in December 2014. The Commission strives to balance the needs of both consumers and utilities when implementing the new law and will provide all interested parties

with opportunities to participate in the process. The Commission’s Feb. 28, 2019, Final Rulemaking Order *Rulemaking to Amend the Provisions of 52 Pa. Code, Chapter 56 to Comply with the Amended Provisions of 66 Pa. C.S. Chapter 14* at Docket # L-2015-2508421 was published in the *Pennsylvania Bulletin* on June 1, 2019. These revised regulations are now effective upon the publication date of June 1, 2019. The Commission appreciates the opportunity to continually evaluate its regulations regarding Chapter 14 so that the goals of increasing utility account collections and eliminating the subsidization of bad debt costs by paying customers do not erode consumer protections.

In 2018, the overall volume of PARs handled by the Commission decreased by 8 percent from 2016. PARs decreased since 2016 for electric by 10 percent, gas by 6 percent and telephone by 58 percent. PARs for water increased by 8 percent since 2016.

### Payment Arrangement Requests (PARs) by Industry\* 2016-18

Industry	2016	2017	2018	% Change 2016-18
Electric	35,049	30,070	31,448	-10%
Gas	13,869	12,443	13,037	-6%
Water	3,890	3,557	4,185	8%
Telephone	85	63	36	-58%
Other	5	3	91	n/a**
<b>Total</b>	<b>52,898</b>	<b>46,136</b>	<b>48,797</b>	<b>-8%</b>

\* Table includes both residential and commercial PARs. Please note: All consumer contacts requesting a payment arrangement are taken in and classified as a PAR. However, not all customers are eligible to receive a PAR.

\*\* For the other industry, 80 of the 91 PARs in 2018 were sewer-related complaints for Pittsburgh Water & Sewer Authority (PWSA), which came under PUC’s regulatory authority Apr. 1, 2018, while the remaining 11 PARs were for other companies. Without PWSA, the 2016-18 percent change would be 120 percent; however, with the addition of PWSA, the 2016-18 percent change is 1,720 percent.

As in past years, the majority of requests for payment arrangements in 2018 involved electric or gas companies. Of the PARs, 64 percent (31,448 cases) were from electric customers, and 27 percent (13,037 cases) were from gas customers. Also, 9 percent of PARs (4,185 cases) came from customers of various water utilities. Less than 1 percent of PARs (36 cases) came from telephone customers.

### First Call Resolution and Requests for Information (Inquiries)

During 2018, BCS received 25,720 customer contacts that, for the most part, required no follow-up investigation beyond the initial contact. While many of these are actually informal complaints resolved on the first call, BCS currently classifies all of these contacts as “inquiries” for the purpose of storing them in its complaint information system. The inquiries for 2018 include contacts to the BCS Utility Customer Hotline, as well as contacts to BCS using mail service and email communication.

In large part, the contacts in 2018 related to the customer assistance programs (CAPs). BCS also classifies certain PARs as inquiries. For example, BCS does not issue payment decisions on requests to restore or avoid suspension/termination of toll or non-basic telephone service. When consumers call with these

problems, BCS classifies these requests as inquiries. Similarly, if a customer has recently been through the BCS payment arrangement process and calls again with a new request regarding the same account without experiencing a situation that would qualify that customer for a subsequent payment arrangement, BCS does not open a new PAR case. In these instances, BCS classifies the customer’s contact as an inquiry.

As in past years, BCS also has shifted some contacts that originated as consumer complaints and PARs into the inquiry category because it was not appropriate to count these contacts as informal complaints. Examples include complaints that were found to be duplicates, informal complaints filed against the wrong company, informal complaints that BCS handled in spite of the fact that customers had not previously contacted their companies about their problems and cases that the investigators verbally dismissed. These 1,135 cases accounted for 4 percent of inquiries in 2018.

BCS is able to expand its list of 79 reasons for contact as consumer reasons grow and change. Possible actions by BCS intake staff include: recording the consumer’s opinion; giving information to the consumer; referring the consumer to a utility company; and referring the consumer to an agency or organization outside of the Commission. If the contact requires further action, the intake staff refers the contact to a BCS investigator, and the contact becomes a consumer complaint or a PAR. The following table shows the various reasons for contact for the 2018 inquiries.

### Categories of 2018 Inquiries

Reason for Contact	Number	Percent
CAP inquiry/contact	5,944	23%
Unable to open new PAR – service on	4,896	19%
Termination or suspension of service	3,244	13%
PUC has no jurisdiction	2,267	9%
Rate protest	1,490	6%
Competition issues and requests for information	1,731	7%
Request for general information	1,191	5%
Billing dispute	960	4%
Applicant/deposit issue	414	2%
Service (company facilities)	396	2%
Unable to open new PAR – service off	274	1%
People-delivered company service	260	1%
Weather outage	62	<1%
Rate complaint	17	<1%
Cramming*	2	<1%
Slamming*	0	0%
Other miscellaneous reasons	1,739	7%
Reason for contact is not available	833	3%
<b>Total</b>	<b>25,720</b>	<b>100%</b>

\* Please refer to the Glossary of Terms, which immediately follows the Telephone industry chapter.

## Residential Consumer Complaints Not Included in Industry Chapters

Traditionally, the primary focus of BCS’s review of utilities’ complaint handling has been on the performance of the major electric, gas, water and telephone utilities. However, for the past several years, BCS has included a limited amount of complaint information for the non-major utilities and the other service providers in the UCARE report. In 2018, BCS experienced an increase in the overall number of residential consumer complaints for the non-major utilities since 2016. Consumer complaints increased in the electric, gas, water and telephone industries. This section presents information about the residential consumer complaints that are not included in the industry chapters that follow.

### Residential Consumer Complaints by Industry for Non-Major Companies\* 2016-18

Industry	2016	2017	2018	% Change 2016-18
Electric	1,168	1,594	1,768	51%
Gas	127	211	358	182%
Water	26	31	33	27%
Telephone	93	120	159	71%
<b>Total</b>	<b>1,414</b>	<b>1,956</b>	<b>2,318</b>	<b>64%</b>

\*See Appendix C

In 2018, BCS staff investigated consumer complaints about a variety of problems that consumers were having with the non-major companies under the Commission’s jurisdiction. The vast majority of complaints not included in the industry chapters involved electric and gas slamming.

The next-highest volume of complaints coming from residential customers of the non-major electric, gas, water and telephone companies involved billing disputes. Those two types of complaints accounted for 78 percent of the residential consumer complaints about the non-major companies in the electric industry; 73 percent of residential consumer complaints about the non-major gas companies; 30 percent of the residential consumer complaints about the non-major water companies; and 14 percent of the complaints about the non-major telecommunications companies.

Appendix C presents a summary of the residential informal complaints (consumer complaints and PARs) that are not included in the electric, gas, water and telephone chapters that follow. The table lists the non-major companies for these industries, the electric generation suppliers and natural gas suppliers and other providers of telecommunications services having five or more residential consumer complaints in 2018.

## Calls to the Commission about Electric and Gas Competition

In 2018, the Commission’s call center employees used BCS’s information system to record information from the consumer contacts about electric and gas competition. Statistics show that 91 percent of contacts about electric and gas competition are related to the electric industry, while 9 percent concern the gas

industry. Call center employees recorded information from 4,367 consumer contacts about competition in the energy industries.

### Consumer Contacts Regarding Competition by Industry 2016-18

Industry	2016	2017	2018	% Change 2016-18
Electric	3,719	3,607	3,980	7%
Gas	272	257	387	42%
<b>Total</b>	<b>3,991</b>	<b>3,864</b>	<b>4,367</b>	<b>9%</b>

Many contacts came from consumers regarding various issues associated with customer choice in the electric and gas industries. Most frequently, consumers contacted BCS about slamming and competition bill disputes (29 and 26 percent of contacts, respectively).

In most instances, BCS classified these contacts as inquiries because they required no investigation or follow-up. However, some consumer contacts required further investigation and possibly action to resolve the consumer’s concerns. In these cases, BCS classified the contact as a consumer complaint and investigated the consumer’s issue. In 2018, slamming complaints produced the largest volume of competition-related consumer complaints. Appendix D-1 explains the types of competition complaints BCS handles.

In prior years, BCS investigated a number of consumer complaints in which consumers alleged they were assigned to an electric or gas supplier without their consent or knowledge (slamming). In 2018, BCS received 930 allegations of electric slamming and 83 allegations of slamming in the gas industry. There were nine allegations of slamming in the telephone industry. With respect to slamming, the Commission has stated clearly, it “...will have zero tolerance for slamming by any means and in any form.”<sup>1</sup> The Commission views customer slamming as among the most serious violations of consumer regulations. Of the 1,022 slamming complaints received by BCS, 981 were filed by residential customers.

### Allegations of Slamming by Industry 2016-18

Industry	2016		2017		2018	
	Residential	Commercial	Residential	Commercial	Residential	Commercial
Electric	659	32	705	37	895	35
Gas	27	2	41	1	80	3
Telephone	5	2	2	1	6	3
<b>Total</b>	<b>691</b>	<b>36</b>	<b>748</b>	<b>39</b>	<b>981</b>	<b>41</b>

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

Competition-related complaints have been excluded from the data set used to prepare the tables in the electric and gas industry chapters to more accurately reflect the distribution company performance. BCS excluded 2,483 competition-related complaints from the electric industry chapter and 266 such complaints in the gas industry chapter. Some customers experience a variety of problems as they choose electric and gas suppliers. BCS found that, after investigating these complaints, it is often difficult to determine who was at fault in causing the complaint. Thus, BCS decided that it would be unfair to include competition complaints with consumer complaints about other issues when it calculates the performance measures it uses to evaluate and compare companies within the electric and gas industries. BCS continues this practice in 2018.

## Informal Compliance Process and Infractions

BCS's informal compliance process remains its primary compliance effort. This process gives each utility specific examples of apparent infractions of Chapters 14, 30, 56, 63 and 64. The informal compliance process uses consumer complaints to identify, document and notify utilities of apparent deficiencies. The utilities can use the information to pinpoint and voluntarily correct deficiencies in their customer-service operations. The process begins by BCS notifying a utility of an alleged infraction. A utility that receives notification of an allegation has an opportunity to respond. If the information about the allegation is accurate, BCS expects the utility to take action to correct the problem or address any deficiencies that led to the infraction. Corrective actions may entail: modifying a computer program; revising company procedures or the text of a notice, bill or letter; or providing additional staff training to ensure the proper use of a procedure.

If the utility states the information is inaccurate, it needs to provide specific details and supporting data to disprove the allegation. BCS always provides a final determination to the utility regarding the alleged infraction. For example, if the utility provides supporting data indicating that the information about the allegation is inaccurate, BCS, after reviewing all the information, informs the utility that, in this instance, the facts do not reflect an infraction of the regulations. On the other hand, if the company agrees the information forming the basis of the allegation is accurate, or if BCS does not find that the data supports the utility's position that the information is inaccurate, BCS informs the company that the facts reflect an infraction of a particular section of the regulations. The notification process allows utilities to receive written clarifications of Chapters 14, 30, 56, 63 or 64 provisions and the policies of the Commission and BCS.

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

## 2. Performance Measures

For the most part, BCS uses complaints it receives from customers of the major electric, gas, water and telephone utilities to assess utilities' complaint-handling performance. In nearly every case, the customer had already contacted the company about the problem prior to contacting BCS. BCS reviews the utility's record as to how the utility handled the complaint when the customer contacted the company. The review includes several classifications and assessments that form the basis of all the performance measures presented in this and the next four chapters, with the exception of the number of terminations and termination rate. The termination statistics for the electric, gas and water companies are drawn from reports required by Chapter 56 at §56.231(a)(14), while telephone termination statistics are drawn from reports required by Chapter 64 at §64.201(7). The sections that follow explain the various measures BCS employs to assess utility performance.

### Consumer Complaint Rate

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

### Justified Consumer Complaint Rate

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

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

BCS monitors the complaint rates and justified rates of the major utilities, paying particular attention to the number of justified complaints that customers file with the Commission. Justified complaints may indicate areas where BCS should discuss complaint-handling procedures with a utility so that its customers receive fair and equitable treatment when they contact the utility. When BCS encounters company case-handling performance (justified consumer complaint rate) that is significantly worse than average, there is reason to suspect that many customers who contact the utility are at risk of improper dispute handling by the utility. As part of the monitoring process, BCS compares the "justified" rates of individual utilities and industries over time and investigates significant changes when they occur. In the chapters that follow, BCS

compares the consumer complaint rates and the justified consumer complaint rates of the major utilities within the electric, gas, water and telephone industries.

## Response Time to Consumer Complaints

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

## Payment Arrangement Request Rate

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

## Justified Payment Arrangement Request Rate

Just as with consumer complaints, once a customer contacts BCS with a PAR, BCS notifies the utility. The company sends a report to BCS that details the customer's payments, usage and payment negotiation history. Many of these cases are "straight" PARs, without any other issue or complaint against the company. Those cases are processed in an automated fashion and are not evaluated in the justified rate. In cases where the utility claims ineligibility for a PUC payment plan or where there are complaints or claims in addition to the PAR, a BCS investigator considers the customer's record and makes a decision regarding the issues and amount owed and notifies the company and the customer of the decision. BCS policy analysts review a sampling of these case records to determine if the utility negotiated properly with the customer and uses this record to determine the outcome of the case. This approach evaluates companies negatively only when BCS finds appropriate payment negotiation procedures were not followed, or where the regulations have been misapplied. Specifically, a case is considered "justified" in the appeal to BCS if it is found that, prior to BCS intervention, the company did not comply with Commission regulations, reports, Secretarial Letters, tariffs or guidelines.

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

## Response Time to Payment Arrangement Requests

Once a customer contacts BCS for a PAR, BCS notifies the utility. The utility then sends BCS records that include the customer's payment history, the amount owed, prior payment arrangements and the results of the most recent payment negotiation with the customer. Response time is the number of days from the date BCS first contacts the utility regarding a PAR to the date on which the utility provides BCS with its utility report. Response time quantifies the speed of a utility's response to BCS PARs. In the following chapters, response time is presented as the average number of days that each utility took to supply BCS with its utility reports.

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

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

## Infraction Rate

During 2018, BCS continued its informal compliance notification process to improve utility compliance with applicable statutes and regulations relating to the treatment of residential accounts. To compare utilities of various sizes within an industry, BCS has calculated a measure called the infraction rate. The infraction rate is the number of informally verified infractions for each 1,000 residential customers.

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

The value of the infraction rate is to depict industry trends over time. The trend for 2018 is calculated using BCS's Compliance Tracking System (CTS) data as of Aug. 19, 2019. The 2018 trends may change if the total number of infractions increases or decreases upon review by BCS. This would occur if new infractions are discovered from customer complaints that originated in 2018 but were still under investigation by BCS when the data was retrieved from CTS. Often, the total number of infractions for the year will change from the number cited in this report. BCS will update the 2018 infraction rate in the report on 2019 complaint activity. Infraction rates for each major electric, gas, water and telephone utility company are shown for 2016, 2017 and 2018 in upcoming chapters. Appendix H shows detailed information about the infractions BCS gleaned from its review of the 2018 consumer complaints and PARs. The information presented in Appendix H shows the infractions of Chapter 56, Chapter 14 and other regulations for the major electric, gas and water companies, and the infractions of Chapters 30, 63, 64 and other regulations for the major telephone companies.

## Termination Rate

Payment over time through a mutually acceptable payment arrangement is one possible outcome when a customer owes an outstanding balance to a utility company. Termination of the utility service is another. BCS views termination of utility service as a utility's last resort when customers fail to meet their payment obligations. The calculation of the termination rate allows the reader to compare the termination activity of utilities with differing numbers of residential customers. For the electric, gas and water industries,

the termination rate is the number of service terminations divided by the number of residential customers. For the telephone industry, the termination rate is the number of terminations for each 1,000 residential customers. Any significant increase in the termination rate would indicate a trend or pattern the Commission may need to investigate.

## BCS Performance Measures and Industry Chapters

The tables in the following chapters present the data alphabetically by company name. Each chapter includes tables that show the consumer complaint rate and the justified consumer complaint rate of each major utility. Also included in the industry chapters are tables that show the prior year's justified consumer complaint rates and justified PAR rates for each of the major utilities. The tables also reflect the average rates of the major utilities within the industry for each of these measures. In addition, each industry chapter presents tables that show infraction rates, response times to consumer complaints and PARs, and the termination rates for the major utilities. In the telephone industry chapter, data regarding Chapter 30 Broadband is also presented.

It is important to note that the electric and gas industry chapters present only data from those utilities that have more than 100,000 residential customers. In the water industry chapter, the individual statistics for the Class A water utilities that have fewer than 100,000 residential customers ("Other Class A") are being presented; however, the "Other Class A" rates continue to be presented as a whole and the Class A Averages are presented based on the individual rates of the water utilities that have more than 100,000 residential customers and the "Other Class A" companies as a whole. The telephone chapter presents data from those local service providers serving more than 50,000 residential customers.

BCS has found the inclusion of statistics for the smaller utilities can skew the average of industry statistics in ways that do not fairly represent industry performance. For this reason, BCS excluded the statistics involving UGI-Electric when it calculated the 2017 and 2018 averages for the electric industry. Similar to previous years, statistics for UGI-Electric are included in the appendices of this report.

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

The Commission has a long history of involvement in electric and gas universal service and energy conservation programs that help utility consumers obtain and keep service, and conserve energy. BCS monitors and evaluates universal service and energy conservation programs. The goal in monitoring these programs is to help the Commission fulfill its oversight responsibilities by increasing the effectiveness of utility collections while protecting the public's health and safety.

The electric and gas programs include: Customer Assistance Programs; the Low-Income Usage Reduction Programs; Utility Hardship Fund Programs; and Customer Assistance and Referral Evaluation Services programs. An explanation of each of these programs is included in the Glossary of Terms. BCS's reporting on these programs is no longer included in this report.

In November 2019, the Commission released the 19th annual report on Universal Service Programs and Collections Performance. BCS prepared the report, which presents 2018 universal service and collections data for the major electric and natural gas distribution companies. The report is available on the Commission's website at: [http://www.puc.pa.gov/General/publications\\_reports/pdf/EDC\\_NGDC\\_UniServ\\_Rpt2018.pdf](http://www.puc.pa.gov/General/publications_reports/pdf/EDC_NGDC_UniServ_Rpt2018.pdf)

Water and telephone companies also offer programs to assist low-income customers. At the end of the water and telephone chapters that follow, readers will find highlights of the water and telephone programs that the Commission has supported and encouraged, not only in 2018, but in prior years as well.

## 3. Electric Industry

In 2018, the Commission had jurisdiction over 15 electric distribution companies (EDCs). However, the majority of the consumer complaints and PARs involving the electric industry were from residential customers of the seven major EDCs: Duquesne Light Co. (**Duquesne**), PECO Energy Co. (**PECO**), PPL Electric Utilities Inc. (**PPL**) and 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 companies.

Most of the complaints and PARs dealt with matters covered under Chapter 56 of our regulations or Chapter 14 of the Public Utility Code. Generally, consumer complaints and PARs represent customer appeals to the Commission resulting from the inability of the company and the customer to reach a mutually satisfactory resolution to a dispute or payment negotiation.

The statistics in the tables on the pages that follow depict the performance of each of the seven major electric utilities in 2018. The tables in the appendices also include UGI-Electric, a major EDC with fewer than 100,000 residential customers. PECO’s statistics include data for both electric and gas service. BCS investigated complaints in 2018, generated as a result of the electric choice program, which allows customers to choose an electric generation supplier (EGS). However, as mentioned in the first chapter, BCS removed these complaints from the data it used to prepare the tables on consumer complaints and PARs. Appendices F and G present 2016, 2017 and 2018 statistics on the performance of the seven largest EDCs, as well as UGI-Electric.

### Consumer Complaints

During 2018, BCS handled 7,358 consumer complaints from residential customers of the various EDCs and 1,758 consumer complaints from residential customers of EGSs. Of these residential complaints, 80 percent (7,272) were from customers of the seven largest EDCs. For the analyses in this chapter, BCS excluded a total of 387 consumer complaints about the major EDCs that involved competition issues.

### Consumer Complaint Categories

The following table shows the percentage of 2018 complaints from residential customers of the seven largest EDCs in each of the 14 categories used by BCS policy analysts. Appendix E, Tables 1 and 2, provides the actual number of cases that fell into each category in 2018.

## Consumer Complaint Categories: 2018 Major Electric Distribution Companies

Categories	Duquesne	Met-Ed**	PECO+**	Penelec**	Penn Power	PPL**	West Penn**	Electric Average
Billing Disputes	17%	14%	16%	21%	22%	24%	17%	<b>18%</b>
Termination or PAR Procedures	26%	7%	13%	12%	16%	16%	8%	<b>14%</b>
Personnel Problems	13%	12%	14%	13%	10%	12%	13%	<b>13%</b>
Service Interruptions	3%	20%	24%	7%	4%	4%	11%	<b>11%</b>
Credit and Deposits	8%	12%	8%	13%	19%	3%	11%	<b>10%</b>
Metering	5%	12%	2%	9%	2%	9%	16%	<b>9%</b>
Damages	2%	4%	7%	5%	8%	6%	9%	<b>6%</b>
Discontinuance/ Transfer	10%	4%	4%	3%	6%	10%	3%	<b>6%</b>
Service Quality	3%	8%	6%	5%	2%	4%	4%	<b>5%</b>
Other Payment Issues	7%	2%	3%	5%	7%	3%	3%	<b>4%</b>
Scheduling Delays	2%	2%	1%	1%	0%	2%	1%	<b>1%</b>
Service Extensions	<1%	2%	<1%	2%	1%	1%	2%	<b>1%</b>
Rates	1%	0%	<1%	1%	1%	1%	<1%	<b>1%</b>
All Other Problems	2%	1%	3%	2%	4%	2%	2%	<b>2%</b>
<b>Total-Number*</b>	<b>401</b>	<b>490</b>	<b>466</b>	<b>441</b>	<b>194</b>	<b>430</b>	<b>497</b>	<b>2,919</b>

\*Based on residential complaints opened in 2018 and evaluated by BCS as of June 21, 2019.

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

+PECO statistics include electric and gas.

- Categories are for all residential complaints filed with BCS that were evaluated, whether or not they were found to be justified. See Appendix D-1 for an explanation of complaint categories and Appendix E, Table 1, for the number of cases in each category.
- In 2018, billing disputes accounted for 18 percent, termination or PAR procedures accounted for 14 percent and personnel problems accounted for 13 percent of the consumer complaints for the major EDCs. These three categories accounted for 45 percent of consumer complaints about the major EDCs.

**2018 Residential Consumer Complaint Rates/  
Justified Consumer Complaint Rates  
Major Electric Distribution Companies**

<b>Company</b>	<b>Consumer Complaint Rate</b>	<b>Justified Consumer Complaint Rate</b>
Duquesne	1.11	0.14
Met-Ed	2.36	0.20*
PECO+	1.25	0.16*
Penelec	1.87	0.10*
Penn Power	1.76	0.15
PPL	0.93	0.09*
West Penn	2.05	0.16*
<b>Average</b>	<b>1.62</b>	<b>0.14</b>

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

+ PECO statistics include electric and gas.

- The consumer complaint rate equals the number of consumer complaints for each 1,000 residential customers. The justified consumer complaint rate equals the number of justified consumer complaints for each 1,000 residential customers.
- For the major EDCs, the average of the consumer complaint rates was over 11 times greater than the average of the justified consumer complaint rates.
- Appendix F, Table 1, presents the number of consumer complaints, the consumer complaint rate, the number of justified consumer complaints and the justified consumer complaint rate for each major EDC in 2016, 2017 and 2018.

**2016-18 Justified Residential  
Consumer Complaint Rates  
Major Electric Distribution Companies**

<b>Company</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>
Duquesne	0.09	0.08	0.14
Met-Ed*	0.17	0.26	0.20
PECO*+	0.05	0.05	0.16
Penelec*	0.15	0.26	0.10
Penn Power	0.22	0.18	0.15
PPL*	0.04	0.07	0.09
West Penn*	0.15	0.20	0.16
<b>Average</b>	<b>0.13</b>	<b>0.16</b>	<b>0.14</b>

\* Based on a probability sample of cases.

+ PECO statistics include electric and gas.

- The justified consumer complaint rate equals the number of justified consumer complaints for each 1,000 residential customers.
- The average of the justified consumer complaint rates for the major electric distribution companies increased from 0.13 in 2016 to 0.14 in 2018. Of the seven major EDCs, four had justified consumer complaint rates that were higher than the industry average.
- The justified consumer complaint rates for Duquesne, Met-Ed, PECO, PPL and West Penn increased from 2016 to 2018, while the rates for Penelec and Penn Power decreased.
- Appendix F, Table 1, presents the number of consumer complaints, the consumer complaint rate, the number of justified consumer complaints and the justified consumer complaint rate for each major EDC in 2016, 2017 and 2018.

**2016-18 Average Response Time to BCS  
Residential Consumer Complaints  
Major Electric Distribution Companies**

Company	Number of Days 2016	Number of Days 2017	Number of Days 2018	Change in Days 2016 to 2018
Duquesne	20.7	10.2	9.0	-11.7
Met-Ed	17.7	15.9	13.6	-4.1
PECO+	13.9	16.1	17.4	3.5
Penelec	17.2	16.5	12.9	-4.3
Penn Power	14.7	14.7	12.1	-2.6
PPL	12.0	14.6	13.8	1.8
West Penn	17.7	16.2	12.8	-4.9
<b>Average</b>	<b>16.3</b>	<b>14.9</b>	<b>13.1</b>	<b>-3.2</b>

+ PECO statistics include electric and gas.

- The calculation for average response time includes all residential consumer complaints for the major electric companies.
- Overall, the average response time decreased by 3.2 days, from 16.3 days in 2016 to 13.1 days in 2018.
- Duquesne had the shortest consumer complaint response time in 2018 at 9.0 days, while PECO had the longest at 17.4 days. Duquesne had the greatest decrease, 11.7 days, in consumer complaint response time from 2016 to 2018.

### Payment Arrangement Requests

In 2018, BCS handled 31,120 PARs from residential customers of the EDCs. There were 179 PARs from residential customers of Pennsylvania’s EGSs. Of the residential PARs, 98 percent (30,638) were from customers of the seven largest EDCs. In 2018, BCS reviewed a representative sample of the PARs for the seven largest EDCs. Thus, the calculation for justified PAR rate that appears in the pages that follow is based on a subset of cases that BCS received from the customers of these utilities. BCS believes that the size of the samples gives a reasonable indication of the performance of these companies. Appendix G, Table 1, provides additional statistics regarding the PARs from residential customers of the major EDCs.

**2018 Residential Payment Arrangement Request (PAR) Rates/  
Justified PAR Rates\*  
Major Electric Distribution Companies**

Company	PAR Rate	Justified PAR Rate
Duquesne	4.07	0.37
Met-Ed	7.07	0.83
PECO+	4.25	0.63
Penelec	8.10	1.09
Penn Power	7.51	1.01
PPL	7.40	0.83
West Penn	6.40	0.57
<b>Average</b>	<b>6.49</b>	<b>0.76</b>

\* All companies have justified PAR rates based on a probability sample of cases.

+ PECO statistics include electric and gas.

- The PAR rate equals the number of PARs for each 1,000 residential customers. The justified PAR rate equals the number of justified PARs for each 1,000 residential customers.
- On average, there were more than six PARs to BCS for each 1,000 residential customers of the major EDCs in 2018. There was less than one justified PAR for each 1,000 residential customers.
- Appendix G, Table 1, presents the number of PARs, the PAR rate, the number of justified PARs and the justified PAR rate for each major EDC in 2016, 2017 and 2018.

**2016-18 Justified Residential  
Payment Arrangement Request (PAR) Rates\*  
Major Electric Distribution Companies**

<b>Company</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>
Duquesne	0.23	0.23	0.37
Met-Ed	1.01	1.00	0.83
PECO+	0.28	0.41	0.63
Penelec	0.91	0.89	1.09
Penn Power	0.98	0.91	1.01
PPL	0.67	0.94	0.83
West Penn	0.33	0.37	0.57
<b>Average</b>	<b>0.63</b>	<b>0.68</b>	<b>0.76</b>

\* All companies have justified PAR rates based on a probability sample of cases.

+ PECO statistics include electric and gas.

- The justified PAR rate equals the number of justified PARs for each 1,000 residential customers.
- The average of the justified PAR rates for the seven major EDCs increased from 0.63 in 2016 to 0.76 in 2018.
- The justified PAR rates increased for six of the seven major EDCs from 2016 to 2018. Four of the major EDCs had justified PAR rates greater than the 2018 industry average while three of the major EDCs had justified PAR rates below the industry average.
- Appendix G, Table 1, presents the number of PARs, the PAR rate, the number of justified PARs and the justified PAR rate for each major EDC in 2016, 2017 and 2018.

**2016-18 Average Response Time to BCS  
Residential Payment Arrangement Requests (PARs)  
Major Electric Distribution Companies**

Company	Number of Days 2016	Number of Days 2017	Number of Days 2018	Change in Days 2016 to 2018
Duquesne	15.7	5.7	3.8	-11.9
Met-Ed	12.5	11.6	8.2	-4.3
PECO+	4.9	5.5	5.4	0.5
Penelec	13.1	12.0	8.6	-4.5
Penn Power	13.0	12.4	9.1	-3.9
PPL	7.5	7.2	5.4	-2.1
West Penn	14.6	12.6	9.1	-5.5
<b>Average</b>	<b>11.6</b>	<b>9.6</b>	<b>7.1</b>	<b>-4.5</b>

+ PECO statistics include electric and gas.

- The calculation for average response time includes PARs from customers of the major electric companies whose service has been terminated, who have a dispute with the company, or who have previously had a BCS payment arrangement for the amount that they owe.
- The average response time for the seven major EDCs decreased by 4.5 days. The average response time went from 11.6 days in 2016 to 7.1 days in 2018.
- There was a wide range of PAR response times among the major EDCs in 2018, from a low of 3.8 days for Duquesne to a high of 9.1 days for Penn Power and West Penn.

### Termination and Reconnection of Service

Each month, the electric companies report to the Commission the number of residential accounts that they terminated for non-payment during the previous month. They also report the number of previously terminated residential accounts that they reconnected during the month. Some EDCs maintain a fairly consistent pattern of termination behavior, while others fluctuate from year to year. The number of reconnections varies from year to year and from company to company, depending on a variety of factors. The EDC reconnects a customer's terminated service when a customer either pays their debt in full or makes a significant payment on the debt and agrees to a payment arrangement for the balance owed to the company. The following tables indicate the annual number of residential accounts each of the seven largest EDCs terminated and reconnected in 2016, 2017 and 2018. The first table also presents the termination rates for each of these companies.

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

Company	Residential Service Terminations				Termination Rates		
	2016	2017	2018	% Change 2016-18	2016	2017	2018
Duquesne	12,726	21,777	26,119	105%	2.42	4.09	4.88
Met-Ed	25,276	23,870	24,099	-5%	5.10	4.78	4.80
PECO+	85,937	90,145	85,583	-<1%	5.86	6.10	4.37
Penelec	22,121	21,096	19,949	-10%	4.41	4.21	3.98
Penn Power	4,651	4,360	4,089	-12%	3.24	3.02	2.81
PPL	40,849	42,216	44,971	10%	3.32	3.45	3.66
West Penn	14,878	14,234	13,577	-9%	2.38	2.28	2.17
<b>Total</b>	<b>206,438</b>	<b>217,698</b>	<b>218,387</b>	<b>6%</b>			
<b>Average of Rates</b>					<b>3.82</b>	<b>4.35</b>	<b>3.81</b>

+ PECO statistics include electric and gas.

- The termination rate is the number of service terminations divided by the number of residential customers, expressed as a percent.
- Overall, the seven major EDCs terminated 6 percent more residential accounts in 2018 than in 2016.

## Residential Service Reconnections Major Electric Distribution Companies

Company	2016	2017	2018	% Change 2016-18
Duquesne	8,710	14,961	19,522	124%
Met-Ed	20,811	19,554	19,916	-4%
PECO+	70,228	74,421	71,705	2%
Penelec	16,942	15,919	14,882	-12%
Penn Power	4,201	3,415	3,186	-24%
PPL	30,669	31,280	31,666	3%
West Penn	11,744	10,783	10,104	-14%
<b>Total</b>	<b>163,305</b>	<b>170,333</b>	<b>170,981</b>	<b>5%</b>

+ PECO statistics include electric and gas.

- Overall, the seven major EDCs reconnected 5 percent more residential accounts in 2018 than in 2016.

## Compliance

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

The infraction rates in the table that follows are based on informal complaints that residential consumers filed with BCS from 2016 through 2018. Infractions identified on complaints involving competition issues are included in the infraction statistics. Appendix H, Table 1, presents detailed information about the infractions identified in 2018 cases to the BCS.

### Commission Infraction Rates Major Electric Distribution Companies

Company	2016	2017	2018
Duquesne	0.11	0.09	0.21
Met-Ed	0.13	0.11	0.12
PECO+	0.06	0.01	0.03
Penelec	0.07	0.12	0.11
Penn Power	0.17	0.12	0.21
PPL	0.05	0.06	0.11
West Penn	0.07	0.09	0.14

+ PECO statistics include electric and gas.

- The infraction rate is the number of informally verified infractions per 1,000 residential customers.
- The infraction rates from 2016 to 2018 for Duquesne, Penelec, Penn Power, PPL and West Penn increased, while the rates for Met-Ed and PECO decreased.
- Appendix H, Table 1, presents the actual number of infractions for 2018 categorized by infraction category.
- As shown in Appendix H, Table 1, the dispute handling category is noteworthy due to both high volume and high percentage of the total number of infractions.

## 4. Natural Gas Industry

In 2018, the Commission had jurisdiction over 25 natural gas distribution companies (NGDCs). However, the majority of the consumer complaints and PARs involving the gas industry came from residential customers of the seven major NGDCs: Columbia Gas of Pennsylvania Inc. (**Columbia**), National Fuel Gas Distribution Corp. (**NFG**), Peoples Natural Gas Co. (**Peoples**), Peoples-Equitable Division (**Peoples-Equitable**), Philadelphia Gas Works (**PGW**), UGI Utilities Inc.-Gas (**UGI-Gas**) and UGI Penn Natural Gas (**UGI Penn Natural**). This chapter will focus exclusively on those seven utilities.

As with the electric industry, most of the complaints and PARs dealt with matters covered under Chapter 56 of our regulations or Chapter 14 of the Public Utility Code. Generally, those consumer complaints and PARs represent customer appeals to the Commission resulting from the inability of the company and the customer to reach a mutually satisfactory resolution to a dispute or payment negotiation.

The statistics in the tables on the pages that follow depict the performance of each of the seven major gas utilities in 2018. Appendices F and G provide statistics for these utilities from 2016, 2017 and 2018.

### Consumer Complaints

During 2018, BCS handled 2,522 consumer complaints from residential customers of the various NGDCs and 184 consumer complaints from residential customers of natural gas suppliers (NGSs). Of these residential complaints, 93 percent (2,348) were from customers of the seven largest NGDCs. For the analyses of the seven major gas companies that appear in this chapter, BCS excluded 49 consumer complaints that involved competition issues.

### Consumer Complaint Categories

The following table shows the percentage of 2018 complaints from residential customers of the seven major gas utilities in each of the 14 categories used by BCS policy analysts. Appendix E, Table 2, provides the actual number of cases that fell into each category in 2018.

**Consumer Complaint Categories: 2018**  
**Major Natural Gas Distribution Companies**

Categories	Columbia	NFG	Peoples	Peoples-Equitable	PGW**	UGI-Gas	UGI Penn Natural	Gas Average
Termination or PAR Procedures	18%	24%	16%	16%	15%	20%	23%	<b>18%</b>
Personnel Problems	24%	12%	20%	23%	22%	14%	9%	<b>18%</b>
Billing Disputes	19%	12%	12%	10%	20%	17%	21%	<b>17%</b>
Discontinuance/Transfer	3%	9%	4%	7%	16%	5%	7%	<b>9%</b>
Other Payment Issues	4%	4%	5%	10%	8%	14%	6%	<b>8%</b>
Metering	3%	21%	7%	3%	6%	5%	17%	<b>8%</b>
Service Quality	8%	3%	17%	11%	<1%	7%	4%	<b>6%</b>
Damages	8%	1%	6%	8%	3%	4%	3%	<b>4%</b>
Scheduling Delays	2%	6%	4%	5%	2%	5%	2%	<b>3%</b>
Credit and Deposits	2%	3%	2%	3%	3%	3%	3%	<b>3%</b>
Service Extensions	5%	4%	1%	2%	<1%	3%	3%	<b>2%</b>
Rates	3%	0%	1%	0%	1%	1%	1%	<b>1%</b>
Service Interruptions	1%	1%	2%	2%	0%	0%	1%	<b>1%</b>
All Other Problems	2%	1%	3%	1%	1%	2%	1%	<b>2%</b>
<b>Total-Number*</b>	<b>110</b>	<b>78</b>	<b>172</b>	<b>145</b>	<b>427</b>	<b>288</b>	<b>188</b>	<b>1,408</b>

\*Based on residential complaints opened in 2018 and evaluated by BCS as of June 21, 2019.

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

- Categories are for all residential complaints filed with BCS that were evaluated, whether or not they were found to be justified. See Appendix D-1 for an explanation of complaint categories and Appendix E, Table 2, for the number of cases in each category.
- In 2018, termination or PAR procedures and personnel problems each generated 18 percent of the complaints about the major gas companies. Complaints about billing disputes accounted for 17 percent of residential consumer complaints about the major gas companies.

**2018 Residential Consumer Complaint Rates/  
Justified Consumer Complaint Rates  
Major Natural Gas Distribution Companies**

<b>Company</b>	<b>Consumer Complaint Rate</b>	<b>Justified Consumer Complaint Rate</b>
Columbia	0.40	0.01
NFG	0.57	0.05
Peoples	0.70	0.02
Peoples-Equitable	0.80	0.04
PGW	2.21	0.15*
UGI-Gas	0.99	0.14
UGI Penn Natural	1.49	0.29
<b>Average</b>	<b>1.02</b>	<b>0.10</b>

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

- The consumer complaint rate equals the number of consumer complaints for each 1,000 residential customers. The justified consumer complaint rate equals the number of justified consumer complaints for each 1,000 residential customers.
- In 2018, the average of the consumer complaint rates was over 10 times the average of the justified consumer complaint rates for the seven major gas companies.
- Appendix F, Table 2, presents the number of consumer complaints, the consumer complaint rate, the number of justified consumer complaints and the justified consumer complaint rate for each major gas company in 2016, 2017 and 2018.

**2016-18 Justified Residential  
Consumer Complaint Rates  
Major Natural Gas Distribution Companies**

<b>Company</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>
Columbia	0.02	0.01	0.01
NFG	0.02	0.04	0.05
Peoples	0.02	0.00	0.02
Peoples-Equitable	0.04	0.01	0.04
PGW*	0.37	0.14	0.15
UGI-Gas	0.02	0.03	0.14
UGI Penn Natural	0.03	0.04	0.29
<b>Average</b>	<b>0.07</b>	<b>0.04</b>	<b>0.10</b>

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

- The justified consumer complaint rate equals the number of justified consumer complaints for each 1,000 residential customers.
- The average justified consumer complaint rate for the major gas companies increased from 0.07 in 2016 to 0.10 in 2018.
- The justified consumer complaint rates for Columbia and PGW decreased, while the rates for NFG, UGI-Gas and UGI Penn Natural increased from 2016 to 2018. The 2018 justified consumer complaint rates for PGW, UGI-Gas and UGI Penn Natural were greater than the 2018 industry average.
- Appendix F, Table 2, presents the number of consumer complaints, the consumer complaint rate, the number of justified consumer complaints and the justified consumer complaint rate for each major gas company in 2016, 2017 and 2018.

**2016-18 Average Response Time to BCS  
Residential Consumer Complaints  
Major Natural Gas Distribution Companies**

<b>Company</b>	<b>Number of Days 2016</b>	<b>Number of Days 2017</b>	<b>Number of Days 2018</b>	<b>Change in Days 2016 to 2018</b>
Columbia	5.2	5.5	6.6	1.4
NFG	5.4	9.6	12.4	7.0
Peoples	4.3	3.0	3.5	-0.8
Peoples-Equitable	2.1	3.0	3.4	1.3
PGW	17.9	19.9	17.6	-0.3
UGI-Gas	5.0	5.8	16.3	11.3
UGI Penn Natural	8.3	7.4	16.0	7.7
<b>Average</b>	<b>6.9</b>	<b>7.8</b>	<b>10.8</b>	<b>3.9</b>

- The calculation for average response time includes all residential consumer complaints for the major gas companies.
- The average response time for the major gas companies increased from 6.9 days in 2016 to 10.8 days in 2018.
- Consumer complaint response time performance varied among the major gas companies in 2018, from a low of 3.4 days for Peoples-Equitable to a high of 17.6 days for PGW.

### Payment Arrangement Requests

In 2018, BCS handled 12,891 PARs from residential customers of the NGDCs. There were 21 PARs from residential customers of Pennsylvania’s NGSs. Of the residential PARs, 95 percent (12,283) were from customers of the seven major NGDCs. In 2018, BCS reviewed a representative sample of the PARs for case outcome for PGW and UGI-Gas. Thus, the calculation for justified PAR rate that appears in the pages that follow is based on a subset of cases that BCS received from customers of these utilities. BCS believes that the size of the samples gives an adequate indication of the performance of these companies. Appendix G, Table 2, provides additional statistics regarding the PARs from residential customers of the major NGDCs.

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

Company	PAR Rate	Justified PAR Rate
Columbia	1.35	0.02
NFG	2.98	0.23
Peoples	2.12	0.15
Peoples-Equitable	2.48	0.15
PGW	12.80	1.28*
UGI-Gas	6.37	0.63*
UGI Penn Natural	9.06	1.41*
<b>Average</b>	<b>5.31</b>	<b>0.55</b>

\* Based on a probability sample of cases.

- The PAR rate equals the number of PARs for each 1,000 residential customers. The justified PAR rate equals the number of justified PARs for each 1,000 residential customers.
- On average, there were more than five PARs to BCS for each 1,000 residential customers of the major NGDCs in 2018. There was less than one justified PAR for each 1,000 residential customers.
- Appendix G, Table 2, presents the number of PARs, the PAR rate, the number of justified PARs and the justified PAR rate for each major gas company in 2016, 2017 and 2018.

**2016-18 Justified Residential  
Payment Arrangement Request (PAR) Rates\*  
Major Natural Gas Distribution Companies**

Company	2016	2017	2018
Columbia	0.03	0.02	0.02
NFG	0.07	0.11	0.23
Peoples	0.05	0.07	0.15
Peoples-Equitable	0.13	0.09	0.15
PGW*	0.62	0.80	1.28
UGI-Gas*	0.37	0.28	0.63
UGI Penn Natural	0.94	0.28	1.41
<b>Average</b>	<b>0.31</b>	<b>0.23</b>	<b>0.55</b>

\* Based on a probability of sample of cases.

- The justified PAR rate equals the number of justified PARs for each 1,000 residential customers.
- The average of the justified PAR rates for the seven major gas utilities increased from 0.31 in 2016 to 0.55 in 2018. Six of the seven major gas companies had increases in their justified PAR rates.
- The 2018 justified PAR rates among the major NGDCs ranged from a low of 0.02 for Columbia to a high of 1.41 for UGI Penn Natural.
- Appendix G, Table 2, presents the number of PARs, the PAR rate, the number of justified PARs and the justified PAR rate for each major gas company in 2016, 2017 and 2018.

**2016-18 Average Response Time to BCS  
Residential Payment Arrangement Requests (PARs)  
Major Natural Gas Distribution Companies**

Company	Number of Days 2016	Number of Days 2017	Number of Days 2018	Change in Days 2016 to 2018
Columbia	2.4	2.2	2.6	0.2
NFG	2.9	3.2	8.4	5.5
Peoples	1.5	0.9	2.2	0.7
Peoples-Equitable	1.3	1.7	2.2	0.9
PGW	10.0	12.0	11.6	1.6
UGI-Gas	1.6	1.7	9.5	7.9
UGI Penn Natural	1.7	1.8	8.8	7.1
<b>Average</b>	<b>3.0</b>	<b>3.4</b>	<b>6.5</b>	<b>3.5</b>

- The calculation for average response time includes PARs from customers of the major NGDCs whose service has been terminated, who have a dispute with the company, or who have previously had a BCS payment arrangement for the amount that they owe.
- From 2016 to 2018, the average response time for the major gas companies increased by 3.5 days.
- The 2018 PAR response times for the major NGDCs varied from a low of 2.2 days for Peoples and Peoples-Equitable to a high of 11.6 days for PGW.

### Termination and Reconnection of Service

Each month, the gas utilities report to the Commission the number of residential accounts that they terminated for nonpayment during the previous month. They also report the number of previously terminated residential accounts that they reconnected during the month. Historically, utilities have shown a varied pattern of termination behavior, from a consistent pattern to one that fluctuates from year to year. The number of reconnections varies from year to year and from company to company, depending on a variety of factors. The NGDC reconnects a customer's terminated service either when a customer pays his/her debt in full or makes a significant payment on the debt and agrees to a payment arrangement for the balance owed to the company. The tables that follow indicate the annual number of residential accounts each of the seven largest gas utilities terminated and reconnected in 2016, 2017 and 2018. The first table also presents the termination rates for each of these companies.

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

Company	Residential Service Terminations				Termination Rates		
	2016	2017	2018	% Change 2016-18	2016	2017	2018
Columbia	9,945	10,728	10,859	9%	2.55	2.73	2.74
NFG	1,422	5,490	6,449	354%	0.72	2.79	3.27
Peoples	7,536	9,744	9,707	29%	2.27	2.92	2.90
Peoples-Equitable	5,845	7,757	8,622	48%	2.40	3.13	3.47
PGW	25,805	27,443	25,576	-1%	5.46	5.78	5.36
UGI-Gas	12,029	8,580	15,924	32%	3.48	2.43	4.40
UGI Penn Natural	6,826	4,840	8,243	21%	4.47	3.14	5.27
<b>Total</b>	<b>69,408</b>	<b>74,582</b>	<b>85,380</b>	<b>23%</b>			
<b>Average of Rates</b>					<b>3.05</b>	<b>3.46</b>	<b>3.92</b>

- The termination rate is the number of service terminations divided by the number of residential customers, expressed as a percent.
- Overall, the seven major gas companies terminated 23 percent more residential accounts in 2018 than in 2016.

**Residential Service Reconnections  
Major Natural Gas Distribution Companies**

Company	2016	2017	2018	% Change 2016-18
Columbia	5,199	5,881	6,054	16%
NFG	913	4,578	4,224	363%
Peoples	5,081	5,884	6,658	31%
Peoples-Equitable	4,006	5,171	6,055	51%
PGW	16,771	18,324	17,657	5%
UGI-Gas	7,556	4,816	10,806	43%
UGI Penn Natural	4,318	2,799	5,539	28%
<b>Total</b>	<b>43,844</b>	<b>47,453</b>	<b>56,993</b>	<b>30%</b>

- Overall, the seven major NGDCs reconnected 30 percent more residential accounts in 2018 than in 2016.

## Compliance

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

The infraction rates in the table that follows are based on the review of informal complaints that residential consumers filed with BCS from 2016 through 2018. Infractions identified on complaints involving competition issues are included in the infraction statistics. Appendix H, Table 2, presents detailed information about the infractions identified in 2018 cases to the BCS.

### Commission Infraction Rates Major Natural Gas Distribution Companies

Company	2016	2017	2018
Columbia	0.01	0.00	0.01
NFG	0.02	0.03	0.05
Peoples	0.02	0.00	0.03
Peoples-Equitable	0.03	0.00	0.02
PGW	0.49	0.12	0.16
UGI-Gas	0.01	0.02	0.15
UGI Penn Natural	0.04	0.06	0.33

- The infraction rate is the number of informally verified infractions per 1,000 residential customers.
- From 2016 to 2018, infraction rates decreased for Peoples-Equitable and PGW. Infraction rates increased for NFG, Peoples, UGI-Gas and UGI Penn Natural, while the infraction rate for Columbia remained stable.
- Appendix H, Table 2, presents the actual number of infractions for 2018 categorized by infraction category.
- As shown in Appendix H, Table 2, the dispute handling category is noteworthy due to both high volume and high percentage of the total number of infractions.

## 5. Water Industry

In 2018, the Commission had jurisdiction over 84 water companies, including 23 municipal water utilities. The Commission categorizes the non-municipal water companies into one of three classifications: A, B and C. Those three classifications are based on the amount of the company's annual revenues.

The non-municipal water companies with the largest annual revenues are classified as Class A water companies. Class A water companies must have annual revenues of \$1 million or more for three years in a row. In 2018, nine Class A water companies served residential customers. The number of residential customers for these companies ranged from 2,432 for SUEZ Water Bethel to 608,928 residential customers for Pennsylvania American Water Co. (**PAWC**).

In 2018, the Class A water companies were Aqua Pennsylvania Inc. (**Aqua**), Audubon Water Co. (**Audubon**), Columbia Water Co. (**Columbia**), Community Utilities of PA (**Community Utilities**), Newtown Artesian Water Co. (**Newtown Artesian**), PAWC, SUEZ Water Bethel f/k/a United Water Bethel (**SUEZ Bethel**), SUEZ Water PA f/k/a United Water of Pennsylvania Inc. (**SUEZ PA**) and York Water Co. (**York**). In 2018, Community Utilities was reclassified from a Class B water company to a Class A water company, following three consecutive years of revenues over \$1 million.

In this chapter, in addition to the statistics for the two largest companies, PAWC and Aqua, the individual statistics for the "Other Class A" companies are being presented; however, the "Other Class A" rates continue to be presented as a whole and the Class A averages are presented based on the individual rates of PAWC, Aqua and the "Other Class A" companies as a whole.

The other classes of water companies have lower annual revenues and, typically, fewer residential customers. In 2018, seven Class B companies were operating. Class B water companies have annual revenues between \$200,000 and \$999,999. In 2018, the number of residential customers for the Class B companies ranged from 287 to 1,362. There were 43 Class C companies in 2018. Class C water companies have annual revenues of less than \$200,000. The number of residential customers for the Class C companies ranged from one to 1,198 in 2018.

The municipal water and sewer utilities are owned by municipalities. The Commission's jurisdiction is limited to regulating the rates and service of customers served by the municipal water and sewer utilities that are outside the boundaries of the municipalities. However, 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 the Pittsburgh Water & Sewer Authority (PWSA) coming under PUC's regulatory jurisdiction, effective Apr. 1, 2018. Although PWSA is a municipal authority water and sewer utility, 66 Pa. C.S.A. § 3202 provides that Commission laws, regulations, orders, etc. shall apply to PWSA in the same manner as a public utility. A Municipal Water and Sewer section appears later in this chapter of the report in order to separate and distinguish municipal water and sewer data from the data of the major water companies.

The majority of residential consumer complaints and PARs to BCS came from customers of the Class A water companies. Most of the complaints and PARs from water customers dealt with matters covered by Chapter 56 of our regulations or Chapter 14 of the Public Utility Code. These consumer complaints and PARs represent customer appeals to the Commission resulting from the inability of the company and the customer to reach a mutually satisfactory resolution to a dispute or payment negotiation.

The tables on the pages that follow depict the performance of the Class A water companies in 2018. Appendices F and G also present statistics about the performance of the Class A water companies in 2016, 2017 and 2018.

## Consumer Complaints

During 2018, BCS handled a total of 1,334 consumer complaints from residential customers of the various water companies. Of those complaints, 98 percent (1,301) were from customers of the major water companies, including 179 PWSA-Water complaints. The remaining 2 percent were from customers of smaller water companies. While a majority of consumer complaints involved the Class A water companies in 2018, the Commission devoted a significant amount of attention to the smaller water companies. Sometimes the amount of time BCS spends on a few complaints from customers of a smaller company exceeds the amount of time it spends addressing complaints filed against one of the larger companies. This is because larger companies typically have more resources to respond appropriately to complaints and PARs as compared to smaller water companies with limited resources.

In 2018, customers of the small water companies filed complaints with BCS for a variety of reasons. Of the 33 consumer complaints filed about the “Non-Class A” water companies, 45 percent (15 cases) involved billing disputes.

## Consumer Complaint Categories

The following table shows the percentage of 2018 complaints from residential customers of the Class A water companies in each of the 14 categories used by BCS policy analysts. Appendix E, Table 3, provides the actual number of cases that fell into each category in 2018.

## Consumer Complaint Categories: 2018 Major Water Companies

Categories	Aqua	PAWC **	Large Class A Avg	Audubon	Columbia	Community Utilities+	Newtown Artesian	SUEZ Bethel	SUEZ PA	York	“Other Class A” Avg***	All Class A Water Average ****
Billing Disputes	36%	23%	<b>28%</b>	0%	50%	80%	0%	0%	41%	57%	<b>48%</b>	<b>30%</b>
Termination or PAR Procedures	15%	20%	<b>18%</b>	0%	0%	20%	100%	0%	0%	14%	<b>7%</b>	<b>17%</b>
Service Quality	11%	17%	<b>15%</b>	100%	0%	0%	0%	0%	24%	5%	<b>16%</b>	<b>15%</b>
Metering	16%	7%	<b>11%</b>	0%	0%	0%	0%	0%	14%	5%	<b>9%</b>	<b>10%</b>
Damages	5%	12%	<b>9%</b>	0%	0%	0%	0%	0%	5%	0%	<b>3%</b>	<b>9%</b>
Discontinuance / Transfer	4%	5%	<b>5%</b>	0%	0%	0%	0%	0%	3%	14%	<b>6%</b>	<b>5%</b>
Service Interruptions	2%	6%	<b>4%</b>	0%	0%	0%	0%	0%	5%	0%	<b>3%</b>	<b>4%</b>
Personnel Problems	3%	4%	<b>4%</b>	0%	0%	0%	0%	0%	0%	5%	<b>1%</b>	<b>4%</b>
Rates	3%	1%	<b>2%</b>	0%	0%	0%	0%	0%	3%	0%	<b>1%</b>	<b>2%</b>
Other Payment Issues	1%	1%	<b>1%</b>	0%	0%	0%	0%	0%	5%	0%	<b>3%</b>	<b>1%</b>
Credit and Deposits	2%	1%	<b>1%</b>	0%	0%	0%	0%	0%	0%	0%	<b>0%</b>	<b>1%</b>
Scheduling Delays	<1%	1%	<b>1%</b>	0%	0%	0%	0%	0%	0%	0%	<b>0%</b>	<b>1%</b>
Service Extensions	<1%	<1%	<b>&lt;1%</b>	0%	0%	0%	0%	0%	0%	0%	<b>0%</b>	<b>&lt;1%</b>
All Other Problems	1%	1%	<b>1%</b>	0%	50%	0%	0%	0%	0%	0%	<b>1%</b>	<b>1%</b>
<b>Total-Number*</b>	<b>248</b>	<b>428</b>	<b>676</b>	<b>1</b>	<b>2</b>	<b>5</b>	<b>1</b>	<b>0</b>	<b>37</b>	<b>21</b>	<b>67</b>	<b>743</b>

\* Based on residential complaints opened in 2018 and evaluated by BCS as of June 21, 2019.

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

\*\*\* Calculated based on the rate of “Other Class A” companies as a whole.

\*\*\*\* Calculated based on the rates of Aqua, PAWC and “Other Class A” companies as a whole.

+ Community Utilities was reclassified as a Class A water company in 2018.

- Categories are for all residential complaints filed with BCS that were evaluated, whether or not they were found to be justified. See Appendix D-1 for an explanation of complaint categories and Appendix E, Table 3, for the number of cases in each category.
- Of residential complaints filed against the Class A water companies, 30 percent involved billing disputes.

**2018 Residential Consumer Complaint Rates/  
Justified Consumer Complaint Rates  
Major Water Companies**

<b>Company</b>	<b>Consumer Complaint Rate</b>	<b>Justified Consumer Complaint Rate</b>
Aqua	0.73	0.16
PAWC	1.24	0.21*
<b>Large Class A Average</b>	<b>0.99</b>	<b>0.19</b>
Audubon	0.37	0.00
Columbia	0.21	0.00
Community Utilities+	1.91	0.00
Newtown Artesian	0.11	0.11
SUEZ Bethel	0.00	0.00
SUEZ PA	0.73	0.15
York	0.39	0.02
<b>“Other Class A” Average**</b>	<b>0.51</b>	<b>0.07</b>
<b>All Class A Average***</b>	<b>0.83</b>	<b>0.15</b>

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

\*\* Calculated based on the rate of “Other Class A” companies as a whole.

\*\*\* Calculated based on the rates of Aqua, PAWC and “Other Class A” companies as a whole.

+ Community Utilities was reclassified as a Class A water company in 2018.

- The consumer complaint rate equals the number of consumer complaints for each 1,000 residential customers. The justified consumer complaint rate equals the number of justified consumer complaints for each 1,000 residential customers.
- The Large Class A consumer complaint rate is over five times greater than the justified consumer complaint rate.
- Appendix F, Table 3, presents the number of consumer complaints, the consumer complaint rate, the number of justified consumer complaints and the justified consumer complaint rate for each Class A water company in 2016, 2017 and 2018.

**2016-18 Justified Residential  
Consumer Complaint Rates  
Major Water Companies**

Company	2016	2017	2018
Aqua	0.11	0.19	0.16
PAWC	0.12	0.14	0.21*
<b>Large Class A Average</b>	<b>0.12</b>	<b>0.17</b>	<b>0.19</b>
Audubon	0.77	0.00	0.00
Columbia	0.00	0.00	0.00
Community Utilities+	n/a	n/a	0.00
Newtown Artesian	0.00	0.00	0.11
SUEZ Bethel	0.00	0.00	0.00
SUEZ PA	0.04	0.02	0.15
York	0.02	0.00	0.02
<b>“Other Class A” Average**</b>	<b>0.04</b>	<b>0.01</b>	<b>0.07</b>
<b>All Class A Average***</b>	<b>0.09</b>	<b>0.11</b>	<b>0.15</b>

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

\*\* Calculated based on the rate of “Other Class A” companies as a whole.

\*\*\* Calculated based on the rates of Aqua, PAWC and “Other Class A” companies as a whole.

+ Community Utilities was reclassified as a Class A water company in 2018.

- The justified consumer complaint rate equals the number of justified consumer complaints for each 1,000 residential customers.
- The Large Class A average justified consumer complaint rate increased from 0.12 in 2016 to 0.19 in 2018.
- Appendix F, Table 3, presents the number of consumer complaints, the consumer complaint rate, the number of justified consumer complaints and the justified consumer complaint rate for each Class A water company in 2016, 2017 and 2018.

**2016-18 Average Response Time to BCS  
Residential Consumer Complaints  
Major Water Companies**

Company	Number of Days 2016	Number of Days 2017	Number of Days 2018	Change in Days 2016 to 2018
Aqua	19.5	18.6	17.5	-2.0
PAWC	23.0	23.5	24.4	1.4
<b>Large Class A Average</b>	<b>21.3</b>	<b>21.1</b>	<b>20.9</b>	<b>-0.4</b>
Audubon	12.0	0.0	21.0	9.0
Columbia	2.5	4.0	3.0	0.5
Community Utilities+	n/a	n/a	16.6	n/a
Newtown Artesian	1.0	0.0	1.0	0.0
SUEZ Bethel	0.0	0.0	0.0	0.0
SUEZ PA	16.2	25.5	25.2	9.0
York	5.5	5.1	3.9	-1.6
<b>“Other Class A” Average*</b>	<b>11.4</b>	<b>17.3</b>	<b>16.6</b>	<b>5.2</b>
<b>All Class A Average**</b>	<b>18.0</b>	<b>19.8</b>	<b>19.5</b>	<b>1.5</b>

\* Calculated based on the rate of “Other Class A” companies as a whole.

\*\* Calculated based on the rates of Aqua, PAWC and “Other Class A” companies as a whole.

+ Community Utilities was reclassified as a Class A water company in 2018.

- The calculation for average response time includes all residential consumer complaints for the Class A water companies.
- The average response time for Aqua decreased by 2.0 days from 2016 to 2018. The average response time for PAWC increased 1.4 days, from 23.0 days in 2016 to 24.4 days in 2018.

## Payment Arrangement Requests

In 2018, BCS handled 4,145 PARs from residential customers of the water industry. Of the residential PARs, 99 percent (4,115) were from customers of the major water companies, including 110 PWSA-Water PARs. As in past years, for the companies with the largest volume of requests, BCS policy analysts reviewed a representative sample of PARs for case outcome. In 2018, BCS reviewed a sample of the PARs for PAWC. Thus, the calculation for justified PAR rate that appears in the pages that follow is based on a subset of cases that BCS received from customers of these companies. BCS believes the size of the sample gives a reasonable indication of the performance. Appendix G, Table 3, provides additional statistics regarding the PARs from residential customers of the Class A water companies.

**2018 Residential Payment Arrangement Request (PAR) Rates/  
Justified PAR Rates  
Major Water Companies**

Company	PAR Rate	Justified PAR Rate
Aqua	1.47	0.14
PAWC	5.33	1.05*
<b>Large Class A Average</b>	<b>3.40</b>	<b>0.60</b>
Audubon	0.37	0.00
Columbia	2.90	0.00
Community Utilities+	1.52	0.00
Newtown Artesian	0.00	0.00
SUEZ Bethel	0.00	0.00
SUEZ PA	0.95	0.04
York	1.31	0.05
<b>“Other Class A” Average**</b>	<b>1.16</b>	<b>0.03</b>
<b>All Class A Average***</b>	<b>2.65</b>	<b>0.41</b>

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

\*\* Calculated based on the rate of “Other Class A” companies as a whole.

\*\*\* Calculated based on the rates of Aqua, PAWC and “Other Class A” companies as a whole.

+ Community Utilities was reclassified as a Class A water company in 2018.

- The PAR rate equals the number of PARs for each 1,000 residential customers. The justified PAR rate equals the number of justified PARs for each 1,000 residential customers.
- On average, there were over two PARs to BCS for each 1,000 residential customers of the Class A water companies in 2018. There was less than one justified PAR for each 1,000 residential customers.
- Appendix G, Table 3, presents the number of PARs, the PAR rate, the number of justified PARs and the justified PAR rate for each Class A water company in 2016, 2017 and 2018.

**2016-18 Justified Residential  
Payment Arrangement Request (PAR) Rates  
Major Water Companies**

Company	2016	2017	2018
Aqua	0.11	0.13	0.14
PAWC*	0.60	0.76	1.05
<b>Large Class A Average</b>	<b>0.35</b>	<b>0.45</b>	<b>0.60</b>
Audubon	0.00	0.00	0.00
Columbia	0.00	0.00	0.00
Community Utilities+	n/a	n/a	0.00
Newtown Artesian	0.00	0.00	0.00
SUEZ Bethel	0.00	0.00	0.00
SUEZ PA	0.04	0.08	0.04
York	0.08	0.00	0.05
<b>“Other Class A” Average**</b>	<b>0.06</b>	<b>0.03</b>	<b>0.03</b>
<b>All Class A Average***</b>	<b>0.26</b>	<b>0.31</b>	<b>0.41</b>

\* Based on a probability sample of cases.

\*\* Calculated based on the rate of “Other Class A” companies as a whole.

\*\*\* Calculated based on the rates of Aqua, PAWC and “Other Class A” companies as a whole.

+ Community Utilities was reclassified as a Class A water company in 2018.

- The justified PAR rate equals the number of justified PARs for each 1,000 residential customers.
- Between 2016 and 2018, the justified PAR rates increased for Aqua, from 0.11 to 0.14, and PAWC, from 0.60 to 1.05.
- Appendix G, Table 3, presents the number of PARs, the PAR rate, the number of justified PARs and the justified PAR rate for each Class A water company in 2016, 2017 and 2018.

**2016-18 Average Response Time to BCS  
Residential Payment Arrangement Requests (PARs)  
Major Water Companies**

Company	Number of Days 2016	Number of Days 2017	Number of Days 2018	Change in Days 2016 to 2018
Aqua	11.2	9.9	9.5	-1.7
PAWC	12.5	15.6	16.7	4.2
<b>Large Class A Average</b>	<b>11.8</b>	<b>12.8</b>	<b>13.1</b>	<b>1.3</b>
Audubon	0.0	46.0	8.0	8.0
Columbia	4.2	4.0	6.1	1.9
Community Utilities+	n/a	n/a	11.5	n/a
Newtown Artesian	0.0	0.0	0.0	0.0
SUEZ Bethel	0.0	0.0	0.0	0.0
SUEZ PA	10.3	19.7	17.8	7.5
York	2.4	3.3	2.1	-0.3
<b>“Other Class A” Average*</b>	<b>5.3</b>	<b>9.1</b>	<b>17.2</b>	<b>11.9</b>
<b>All Class A Average**</b>	<b>9.6</b>	<b>11.6</b>	<b>11.1</b>	<b>1.5</b>

\* Calculated based on the rate of “Other Class A” companies as a whole.

\*\* Calculated based on the rates of Aqua, PAWC and “Other Class A” companies as a whole.

+ Community Utilities was reclassified as a Class A water company in 2018.

- The calculation for average response time includes PARs from customers of the Class A water companies whose service has been terminated, who have a dispute with the company, or who have previously had a BCS payment arrangement for the amount that they owe.
- Aqua’s response time decreased from 2016 by 1.7 days to 9.5 days in 2018. PAWC’s response time increased 4.2 days, from 12.5 days in 2016 to 16.7 days in 2018.

## Termination and Reconnection of Service

Each month, the water utilities report to the Commission the number of residential accounts that they terminated for nonpayment during the previous month. They also report the number of previously terminated residential accounts that they reconnected during the month. Historically, utilities have shown a varied pattern of termination behavior, from a consistent pattern to one that fluctuates from year to year. The number of reconnections varies from year to year and from company to company, depending on a variety of factors. The water company reconnects a customer’s terminated service either when a customer pays his/her debt in full or makes a significant payment on the debt and agrees to a payment arrangement for the balance owed to the company. The tables that follow indicate the annual number of residential accounts each of the water utilities terminated and reconnected in 2016, 2017 and 2018. The first table also presents the termination rates for each of these companies.

**Residential Service Terminations/Termination Rates  
Major Water Companies**

Company	Residential Service Terminations				Termination Rates		
	2016	2017	2018	% Change 2016-18	2016	2017	2018
Aqua	6,735	5,912	7,415	10%	1.70	1.48	1.85
PAWC	17,796	21,475	24,695	39%	2.97	3.54	4.06
<b>Large Class A Total</b>	<b>24,531</b>	<b>27,387</b>	<b>32,110</b>	<b>31%</b>			
<b>Large Class A Average of Rates</b>					<b>2.34</b>	<b>2.73</b>	<b>2.96</b>
Audubon	0	0	0	0%	0.00	0.00	0.00
Columbia	183	197	241	32%	1.93	2.05	2.49
Community Utilities+	n/a	n/a	157	n/a	n/a	n/a	5.98
Newtown Artesian	50	62	43	-14%	0.52	0.65	0.46
SUEZ Bethel	0	0	0	0%	0.00	0.00	0.00
SUEZ PA	725	501	372	-49%	1.35	1.00	0.68
York	1,113	953	1,121	1%	1.86	1.56	1.82
<b>“Other Class A” Total</b>	<b>2,071</b>	<b>1,713</b>	<b>2,083</b>	<b>1%</b>			
<b>“Other Class A” Average of Rates*</b>					<b>0.94</b>	<b>1.27</b>	<b>2.45</b>
<b>All Class A Total</b>	<b>26,602</b>	<b>29,100</b>	<b>34,193</b>	<b>29%</b>			
<b>All Class A Average of Rates**</b>					<b>1.87</b>	<b>2.10</b>	<b>2.79</b>

\* Calculated based on the rate of “Other Class A” companies as a whole.

\*\* Calculated based on the rates of Aqua, PAWC and “Other Class A” companies as a whole.

+ Community Utilities was reclassified as a Class A water company in 2018.

- The termination rate is the number of service terminations divided by the number of residential customers, expressed as a percent.
- Overall, the Class A water companies terminated 29 percent more residential accounts in 2018 than in 2016.

## Residential Service Reconnections Major Water Companies

Company	2016	2017	2018	% Change 2016-18
Aqua	4,815	4,734	5,898	22%
PAWC	15,601	18,947	20,974	34%
<b>Large Class A Total</b>	<b>20,416</b>	<b>23,681</b>	<b>26,872</b>	<b>32%</b>
Audubon	0	0	0	0%
Columbia	118	137	167	42%
Community Utilities+	n/a	n/a	59	n/a
Newtown Artesian	47	49	37	-21%
SUEZ Bethel	0	0	0	0%
SUEZ PA	467	364	177	-62%
York	820	585	763	-7%
<b>“Other Class A” Total</b>	<b>1,452</b>	<b>1,135</b>	<b>1,247</b>	<b>-14%</b>
<b>All Class A Total</b>	<b>21,868</b>	<b>24,816</b>	<b>28,119</b>	<b>29%</b>

+ Community Utilities was reclassified as a Class A water company in 2018.

- Overall, the Class A water companies reconnected 29 percent more residential accounts in 2018 than in 2016.

## Compliance

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

The infraction rates in the table that follows are based on the review of informal complaints that residential consumers filed with BCS from 2016 through 2018. Appendix H, Table 3, presents detailed information about the infractions identified in 2018 cases to the BCS.

### Commission Infraction Rates Major Water Companies

Company	2016	2017	2018
Aqua	0.20	0.36	0.31
PAWC	0.18	0.16	0.25
Audubon	0.77	0.00	0.00
Columbia	0.00	0.00	0.10
Community Utilities+	n/a	n/a	0.00
Newtown Artesian	0.00	0.00	0.11
SUEZ Bethel	0.00	0.00	0.00
SUEZ PA	0.04	0.02	0.18
York	0.00	0.00	0.03

+ Community Utilities was reclassified as a Class A water company in 2018.

- The infraction rate is the number of informally verified infractions per 1,000 residential customers.
- The infraction rate for Audubon decreased from 2016 to 2018, while the infraction rates for Aqua, PAWC, Columbia, Newtown Artesian, SUEZ PA and York increased. The rate for SUEZ Bethel remained stable.
- Appendix H, Table 3, presents the actual number of infractions for 2018 categorized by infraction category.
- As shown in Appendix H, Table 3, the dispute handling category is noteworthy due to both high volume and high percentage of the total number of infractions.

## Municipal Water and Sewer

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

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

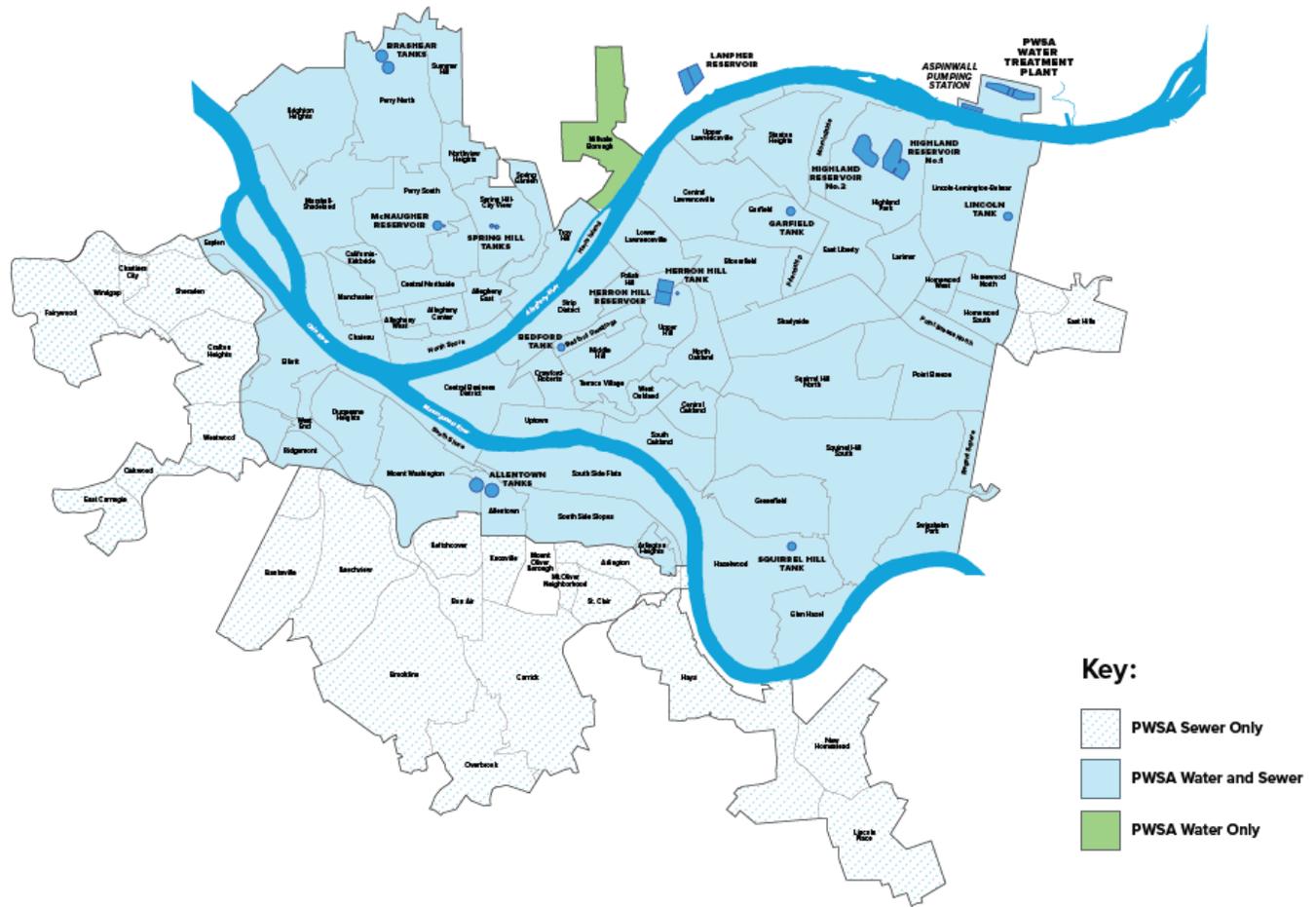
Act 65 also required PWSA to file a Compliance Plan with the PUC detailing how the authority would bring its existing operating systems and procedures into compliance with applicable rules, regulations and orders of the Commission. The law mandates the PUC conduct an in-depth review of PWSA's Compliance Plan to ensure the Authority's compliance with the Public Utility Code and the Commission's regulations. 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), is ongoing by the PUC at the time of this report.

In order to assist PWSA in the transition to PUC regulation, BCS provided extensive training to both PWSA and PUC staff. BCS conducted several on-site trainings in Pittsburgh to instruct PWSA staff on Commission regulations and policies. BCS staff also worked closely with PWSA management to review their practices and procedures to ensure they comply with applicable PUC laws and regulations. In addition to the training provided to PWSA, BCS provided training to its call center staff and investigators so they could best assist PWSA customers. Given the applicability of PWSA's prior tariff during its transition to PUC regulatory jurisdiction, BCS staff were trained on the prior tariff and instructed on the proper regulations to apply when investigating an informal PWSA complaint.

As a measure to provide consistent and uniform guidance to PWSA, BCS directed that all informal PWSA cases be reviewed by seasoned PUC managers. As cases were reviewed, BCS staff communicated directly with PWSA management to explain BCS decisions and to address compliance concerns. PWSA staff continue to cooperate with the PUC and are receptive to the Commission's feedback to ensure a smooth transition to PUC regulation.

PWSA is the largest combined water and sewer authority in Pennsylvania and currently serves over 95,000 residential customers throughout the City of Pittsburgh and surrounding communities. In addition to providing water and wastewater collection services, PWSA provides wastewater conveyance to city residents served by the Pennsylvania-American Water Company 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 Allegheny County Sanitary Authority (ALCOSAN), whose charges for sewage treatment appear on the billing statements of PWSA customers.

# PWSA Service Areas



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

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

In addition to the above clarification, it is important to note that data on PWSA infractions is not provided in this section as it is similarly provided for the major water companies. Since PWSA’s transition to PUC regulation is ongoing, as described above, it is premature for BCS to report this data. BCS will publish PWSA infraction data in future UCARE reports when all compliance transition activities are completed, including the PUC’s review of the PWSA Compliance Plan.

**Informal Complaint Activity: 2018  
Municipal Water and Sewer**

Company	Inquiries	Residential Consumer Complaints*	Residential PARs*	Total Activity
PWSA-Water	160	179	110	449
PWSA-Sewer	52	87	80	219
<b>Total</b>	<b>212</b>	<b>266</b>	<b>190</b>	<b>668</b>

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

**2018 Average Response Time to BCS  
Residential Informal Complaints  
Municipal Water and Sewer Utilities**

Company	Consumer Complaints	Payment Agreement Requests
	Number of Days 2018	Number of Days 2018
PWSA-Water*	7.1	8.2
PWSA-Sewer*	8.1	7.1
<b>Average</b>	<b>7.6</b>	<b>7.7</b>

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

- The calculation for average response time for PARs includes customers whose service has been terminated, who have a dispute with the company, or who have previously had a BCS payment arrangement for the amount that they owe.

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

Company	Residential Service Terminations	Termination Rate	Reconnections
	2018	2018	2018
PWSA*	1,622	1.70	1,261

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

- The termination rate is the number of service terminations divided by the number of residential customers, expressed as a percent.
- For 2018, the number of PWSA terminations and reconnections represents the total number of residential customers who were terminated and reconnected in 2018. 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.

### Programs That Assist Low-Income Customers

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

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

Helping Hand is for customers at or below 200 percent of the federal poverty level. On April 1, 2009, in recognition of the current economic climate, the company eased the remaining minimum requirements. The company reduced the minimum past amount due from \$150 to \$110, and the minimum number of days past due from 30 to 21. Each household enrolled in the Helping Hand program receives a plumbing inspection, including minor repairs, and/or a conservation kit, containing water-saving devices. The customer also receives water usage and conservation information. Customers who make their payments on time and in full receive a credit of \$20 per month applied to their arrearage.

At the end of 2018, 179 active participants were enrolled in the Helping Hand program. During the year, Aqua spent \$73,678 to complete eligibility interviews and household audits. In addition, the company provided \$11,700 in arrearage forgiveness credits to 176 program participants.

Pennsylvania American Water Co. (PAWC) – In 1991, PAWC established the “Help to Others” (H2O) program. Beginning Jan. 1, 2018, the H2O program increased its benefit to customers by providing customers with an 85 percent discount on their monthly service fees – a savings of about \$14 per month. The program also provides water-saving devices and conservation education. As of March 2019, there were 22,395 customers billed the discounted rate.

In addition to a discount for water, the company also offers a discount for wastewater customers. Beginning Jan. 1, 2018, this discount was increased. It now offers a 20 percent discount off the total wastewater billing for those who qualify. As of March 2019, there were 2,068 customers billed the discount for wastewater.

As part of the H2O program, PAWC also participates with the Dollar Energy Fund to provide cash grants of up to \$500 per year for those water and wastewater customers listed above. Dollar Energy Fund is a hardship fund administrator that provides cash assistance to utility customers who need help in paying their utility bills. During the 2017-18 program year, PAWC's shareholders and customers provided \$449,745 in hardship fund benefits to 1,800 customers for an average benefit of \$250. In addition, PAWC's shareholders provided \$47,472 for the 2017-18 program year for their wastewater customers. The funds provided benefits to 156 customers for an average benefit of \$304.

PWSA participates with the Dollar Energy Fund to provide several customer assistance programs. The Bill Discount Program provides a percentage-based reduction of fixed monthly water and wastewater conveyance charges for customers at or below 150 percent of the Federal Poverty Level. In 2018, 2,530 customers were enrolled in the Bill Discount Program at a 50 percent reduction. In 2019, discounts were raised to 75 percent.

The Hardship Cash Assistance Program extends cash grants up to \$300 per year for customers who are at or below 150 percent of the Federal Poverty Level. During 2018, PWSA provided \$21,932 in cash grants to 91 water customers for an average benefit of \$241.

The Private Lead Line Replacement Community Environmental Project (CEP) offers private side lead line replacements for customers who are at or below 250 percent of the Federal Poverty Level. PWSA started CEP construction in late 2018. During 2018, PWSA performed work at 18 locations, 10 of which were verified to have had lead in some portion of the service line. By the end of 2018, seven of those locations were replaced, having spent around \$80,000. Approximately \$30,000 of this amount was related to the private side of the service lines where funds from the \$1.8 million allocated in the DEP settlement could be used.

PWSA customers are also eligible for assistance through the Allegheny County Sanitary Authority's (ALCOSAN) Clean Water Assistance Fund. This program provides a \$32 credit every three months to help qualifying low-income customers pay their wastewater treatment bills. This program provided \$48,090 in grants to 1,603 PWSA customers in 2018.

Suez Water Pennsylvania f/k/a United Water of Pennsylvania Inc. (Suez Water PA) – Suez Water PA implemented the "Suez Cares" f/k/a "UW Cares" program in 2005. Suez Cares is a nonprofit 501(c)(3) organization that provides financial assistance to customers who experience a temporary financial crisis caused by such occurrences as a job loss, severe illness, casualty or extensive military service. Cash grants up to \$100 are provided to qualifying customers who are first screened by the Salvation Army for eligibility. To be eligible for a grant, customers must have made a nominal payment within the last 90 days. During the 2018 program year, the company provided grants totaling \$4,394 to qualifying customers.

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

During 2018, the company expended \$224 for customer plumbing repairs and enrolled a total of three new customers in the York Water Cares program. As of program end 2018, five customers received arrearage

forgiveness benefits totaling \$345 for an average benefit of approximately \$69 per customer. The company anticipates an annual savings of \$300 in costs for termination proceedings that may be avoided as a result of customer participation in the York Water Cares program.

## 6. Telephone Industry

During 2018, BCS handled consumer complaints, payment agreement requests (PARs) and inquiries from the customers of a variety of telecommunications service providers, including incumbent local exchange carriers (ILECs), competitive local exchange carriers (CLECs), long-distance companies, resellers and wireless eligible telecommunications carriers (Wireless ETCs).

In 2018, there were 610 providers of telecommunications services with certificates of public convenience in Pennsylvania. Of these, 37 were ILECs. The ILECs included 32 non-major utilities that each served less than 50,000 residential customers and five major utilities that each served over 50,000 residential customers.

In 2018, Pennsylvania local exchange carriers supplied voice service to an average of 1,017,362 residential service lines each month. Because the five major ILECs provided voice service to the vast majority of those service lines (an average of 898,239 residential service lines each month), this chapter will focus on the five major ILECs – CenturyLink (**CenturyLink**), Frontier Communications Commonwealth Telephone Co. (**Frontier Commonwealth**), Verizon North LLC (**Verizon North**), Verizon Pennsylvania LLC (**Verizon PA**) and Windstream Communications (**Windstream**).

Unlike the electric, gas and water chapters, the analyses of the five companies that appear in this chapter include complaints about competition-related issues such as slamming, competition-related service complaints and billing problems. This is the 16<sup>th</sup> year that BCS included competition-related complaints in its analyses of the telephone companies.

Act 183 of 2004, the Nov. 30, 2004 amendment to Chapter 30, addressed allowing a local exchange carrier to petition the Commission for a determination of whether a protected or retail non-competitive service was competitive based on the availability of like or substitute services offered by other providers. On Mar. 4, 2015, the Commission entered the Opinion and Order at Docket Nos. P-2014-2446303 and P-2014-2446304, which granted competitive reclassification in 153 Verizon PA and Verizon North wire centers for which competitive reclassification was sought for basic local exchange telephone services.<sup>2</sup> The reclassification waived certain sections of 52 Pa. Code, Chapters 63<sup>3</sup> and 64<sup>4</sup> for a maximum of 5 years or a final rulemaking.

### Consumer Complaints

Although BCS handled consumer complaints about different types of telecommunications service providers in 2018, the complaints predominantly came from the residential customers of the five major ILECs. Overall, BCS handled 1,754 consumer complaints from residential customers of telecommunications service providers in 2018. Of those complaints, 1,595 were from residential customers of the five major ILECs, while 21 consumer complaints were received for the non-major ILECs. Meanwhile, 63 consumer complaints were from residential customers of the CLECs operating in Pennsylvania. Additionally, BCS handled 57 consumer complaints regarding wireless ETCs that provide Lifeline services in Pennsylvania, and the remaining 18

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<sup>2</sup> See Appendix B of Docket Nos. P-2014-2446303 and P-2014-2446304, Mar. 4, 2015.

<sup>3</sup> See Appendix D of Docket Nos. P-2014-2446303 and P-2014-2446304, Mar. 4, 2015.

<sup>4</sup> See Appendix E of Docket Nos. P-2014-2446303 and P-2014-2446304, Mar. 4, 2015.

consumer complaints were from residential customers of other telecommunications providers such as long-distance carriers, resellers and Voice over Internet Protocol (VoIP) providers.

## Consumer Complaint Categories

The following table shows the percentage of 2018 consumer complaints from residential customers of the major telephone companies in each of the 11 categories used by BCS policy analysts to categorize consumer complaints about telephone companies.

### Consumer Complaint Categories: 2018 Major Local Telephone Companies

Categories	Century-Link	Frontier Commonwealth	Verizon North	Verizon PA**	Windstream	Telephone Average
Unsatisfactory Service	82%	69%	78%	68%	90%	<b>75%</b>
Billing Disputes	4%	8%	10%	10%	2%	<b>8%</b>
Service Delivery	4%	7%	0%	6%	2%	<b>5%</b>
Service Terminations	2%	2%	2%	2%	1%	<b>2%</b>
Competition	0%	1%	0%	2%	1%	<b>1%</b>
Discontinuance/Transfer	0%	4%	0%	<1%	0%	<b>1%</b>
Non-Recurring Charges	0%	2%	3%	<1%	0%	<b>1%</b>
Credit and Deposits	1%	1%	0%	0%	0%	<b>&lt;1%</b>
Toll Services	0%	1%	2%	0%	0%	<b>&lt;1%</b>
Annoyance Calls	0%	0%	0%	0%	0%	<b>0%</b>
All Other Problems	6%	7%	5%	11%	4%	<b>8%</b>
<b>Total-Number*</b>	<b>143</b>	<b>129</b>	<b>58</b>	<b>427</b>	<b>142</b>	<b>899</b>

\*Based on residential complaints opened in 2018 and evaluated by BCS as of June 21, 2019.

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

- Categories are for all residential complaints filed with BCS, whether or not they were found to be justified. See Appendix D-2 for an explanation of complaint categories and Appendix E, Table 4, for the number of cases in each category.
- Of all complaints for the major telephone companies, 88 percent fall into one of three complaint categories: unsatisfactory service, billing disputes or service delivery.
- Unsatisfactory service complaints account for 75 percent of the total number of consumer complaints for the five major telephone companies in 2018. In 2017, unsatisfactory service accounted for 57 percent of all consumer complaints for the major telephone companies.

The 2016, 2017 and 2018 consumer complaint figures for justified consumer complaint rates and response times for each of the major telephone companies are presented on the following pages. Appendix F, Table 4, provides additional statistics about the consumer complaints from residential customers of the five major local telephone companies.

**2018 Residential Consumer Complaint Rates/  
Justified Consumer Complaint Rates  
Major Local Telephone Companies**

Company	Consumer Complaint Rate	Justified Consumer Complaint Rate
CenturyLink	1.47	0.94
Frontier Commonwealth	1.66	1.11
Verizon North	0.64	0.36
Verizon PA	2.06	1.17*
Windstream	2.07	1.42
<b>Average</b>	<b>1.58</b>	<b>1.00</b>

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

- The consumer complaint rate equals the number of consumer complaints for each 1,000 residential customers. The justified consumer complaint rate equals the number of justified consumer complaints for each 1,000 residential customers.
- For the five major telephone companies, the average consumer complaint rate is slightly higher than the average justified consumer complaint rate.
- Appendix F, Table 4, presents the number of consumer complaints, the consumer complaint rate, the number of justified consumer complaints and the justified consumer complaint rate for each major telephone company in 2016, 2017 and 2018.

**2016-18 Justified Residential  
Consumer Complaint Rates  
Major Local Telephone Companies**

Company	2016	2017	2018
CenturyLink	0.23	0.31	0.94
Frontier Commonwealth	0.46	0.78	1.11
Verizon North	0.25	0.16	0.36
Verizon PA*	0.49	0.60	1.17
Windstream	0.69	1.18	1.42
<b>Average</b>	<b>0.42</b>	<b>0.61</b>	<b>1.00</b>

\* Based on a probability sample of cases.

- The justified consumer complaint rate equals the number of justified consumer complaints for each 1,000 residential customers.
- The justified consumer complaint rates for all five of the major telephone companies increased from 2016 to 2018.
- Frontier Commonwealth, Verizon PA and Windstream had 2018 justified consumer complaint rates that were higher than the industry average.
- Appendix F, Table 4, presents the number of consumer complaints, the consumer complaint rate, the number of justified consumer complaints and the justified consumer complaint rate for each major telephone company in 2016, 2017 and 2018.

**2016-18 Average Response Time to BCS  
Residential Consumer Complaints  
Major Local Telephone Companies**

Company	Number of Days 2016	Number of Days 2017	Number of Days 2018	Change in Days 2016 to 2018
CenturyLink	9.9	10.0	13.5	3.6
Frontier Commonwealth	20.5	11.6	11.4	-9.1
Verizon North	14.1	13.4	15.8	1.7
Verizon PA	14.9	13.9	15.1	0.2
Windstream	26.3	23.0	17.0	-9.3
<b>Average</b>	<b>17.1</b>	<b>14.4</b>	<b>14.6</b>	<b>-2.5</b>

- For the five major telephone companies, the average response time to consumer complaints decreased from 17.1 days in 2016 to 14.6 days in 2018.
- The average response times for Frontier Commonwealth and Windstream decreased by over 9 days since 2016.

**Payment Agreement Requests**

Telephone service consists of three components: basic service, non-basic service and toll service. BCS does not handle customer requests for payment agreements that involve toll or non-basic services because with respect to telephone payment agreements, the PUC’s jurisdiction is limited to basic voice service. For the telephone industry, PARs are principally contacts to BCS or to companies involving a request for payment terms for arrearages associated with basic service. Failure to enter into a payment agreement or pay arrearages due for basic service may result in suspension, and subsequent termination, of basic service.<sup>5</sup> Suspension of basic telephone 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 agreements after they have received a suspension notice.

Under Chapter 64, a customer contact in response to a suspension notice is a dispute (as the term is defined in Section 64.2) only if the contact includes a disagreement with respect to the application of a provision of Chapter 64. Where telephone cases involving telephone service suspension are concerned, failure to negotiate a payment agreement does not in itself mean that a dispute exists. Consequently, in this report, telephone cases that involve PARs have been separated from telephone PARs that also involve a dispute. For the telephone industry, PARs that involve a dispute are classified as consumer complaints. During 2018, BCS handled 36 PARs from residential customers of telecommunications service providers. Of these PARs, 32 were from residential customers of the five major telephone companies.

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<sup>5</sup> Suspension or termination of basic local exchange service can also occur when a consumer refuses to voluntarily transition their service from traditional copper to fiber during an ILEC’s network transformation.

The 2016, 2017 and 2018 justified PAR rates and response times for the major telephone companies are presented in the tables that follow.

**2018 Residential Payment Agreement Request (PAR) Rates/  
Justified PAR Rates  
Major Local Telephone Companies**

Company	PAR Rate	Justified PAR Rate
CenturyLink	0.03	0.00
Frontier Commonwealth	0.03	0.02
Verizon North	0.02	0.00
Verizon PA	0.04	0.00
Windstream	0.04	0.00
<b>Average</b>	<b>0.03</b>	<b>0.00</b>

- The PAR rate equals the number of PARs for each 1,000 residential customers. The justified PAR rate equals the number of justified PARs for each 1,000 residential customers.
- On average, there was less than one PAR to BCS for each 1,000 residential customers of the major telephone companies in 2018. Frontier Commonwealth was the only telephone company with a statistically significant justified PAR rate.
- Appendix G, Table 4, presents the number of PARs, the PAR rate, the number of justified PARs and the justified PAR rate for each major telephone company in 2016, 2017 and 2018.

**2016-18 Justified Residential  
Payment Agreement Request (PAR) Rates  
Major Local Telephone Companies**

<b>Company</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>
CenturyLink	0.02	0.01	0.00
Frontier Commonwealth	0.02	0.01	0.02
Verizon North	0.00	n/a*	0.00
Verizon PA	0.02	0.00	0.00
Windstream	0.01	0.02	0.00
<b>Average</b>	<b>0.01</b>	<b>0.01*</b>	<b>0.00</b>

\* No PARs were received for Verizon North in 2017, so its justified PAR rate could not be calculated; therefore, the calculation of the 2017 industry average excludes Verizon North.

- The justified PAR rate equals the number of justified PARs for each 1,000 residential customers.
- The average justified PAR rate for the five major telephone companies decreased from 0.01 in 2016 to 0.00 in 2018. Frontier Commonwealth had a justified PAR rate greater than the 2018 industry average.
- Three of the five major telephone companies had justified PAR rates that decreased from 2016 to 2018, while one remained stable.
- Appendix G, Table 4, presents the number of PARs, the PAR rate, the number of justified PARs and the justified PAR rate for each major telephone company in 2016, 2017 and 2018.

**2016-18 Average Response Time to BCS  
Residential Payment Agreement Requests (PARs)  
Major Local Telephone Companies**

Company	Number of Days 2016	Number of Days 2017	Number of Days 2018	Change in Days 2016 to 2018
CenturyLink	5.4	6.6	8.3	2.9
Frontier Commonwealth	16.8	3.1	7.7	-9.1
Verizon North	27.0	n/a*	7.5	-19.5
Verizon PA	13.5	8.6	7.8	-5.7
Windstream	19.3	21.6	15.0	-4.3
<b>Average</b>	<b>16.4</b>	<b>10.0*</b>	<b>9.3</b>	<b>-7.1</b>

\* No PARs were received for Verizon North in 2017, so its response time could not be calculated; therefore, the calculation of the 2017 industry average excludes Verizon North.

- The average response time to PARs for the five major telephone companies decreased from 16.4 days in 2016 to 9.3 days in 2018.
- The response time to PARs for CenturyLink increased from 2016 to 2018, while the other four major telephone companies decreased.

## Termination of Service

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

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

Company	Residential Service Terminations				Termination Rates		
	2016	2017	2018	% Change 2016-18*	2016	2017	2018
CenturyLink	9,588	8,232	7,188	n/a	74.40	64.56	62.72
Frontier Commonwealth	2,388	3,168	2,544	n/a	23.62	33.30	29.12
Verizon North	4,056	3,060	4,284	n/a	27.07	23.84	39.79
Verizon PA	25,404	18,132	15,852	n/a	33.97	28.92	31.07
Windstream	3,132	3,240	2,928	n/a	34.51	38.71	37.35
<b>Total</b>	<b>44,568</b>	<b>35,832</b>	<b>32,796</b>	<b>n/a</b>			
<b>Average of Rates</b>					<b>38.71</b>	<b>37.86</b>	<b>40.01</b>

\*The percent change comparison of the number of residential terminations is not applicable to the telephone industry because it does not accurately reflect the reduction in the number of regulated service lines between 2016 and 2018.

- The termination rate equals the number of basic service terminations for each 1,000 residential customers.
- Overall, the average residential service termination rate for the major telephone companies increased from 38.71 in 2016 to 40.01 in 2018.

### Compliance

The informal compliance notification process enables BCS to provide companies with written clarifications and explanations of Chapters 30, 63 and 64 provisions and other Commission regulations and policies. The informal compliance process is specifically designed to identify systemic errors. Companies can then investigate the scope of the problem and take corrective action. Appropriate corrective action usually involves modifying a computer program; revising the text of a notice, a billing or a letter; changing a company procedure; or providing additional staff training to ensure the proper implementation of a sound procedure.

Each year, BCS retrieves infraction data from the BCS Compliance Tracking System and produces tables that present infraction statistics for the major telephone companies reviewed in this chapter. The infraction statistics are drawn from cases that residential consumers filed with BCS in 2016, 2017 and 2018. Appendix H, Table 4, presents detailed information about the infractions identified in 2018 cases to the BCS.

## Commission Infraction Rates Major Local Telephone Companies

Company	2016	2017	2018
CenturyLink	0.50	0.92	2.48
Frontier Commonwealth	1.42	2.84	4.41
Verizon North	1.11	0.51	1.26
Verizon PA	1.20	1.52	2.28
Windstream	2.91	5.60	5.69

- The infraction rate is the number of informally verified infractions per 1,000 residential customers.
- Since 2016, the infraction rates for all five of the major telephone companies increased.
- Appendix H, Table 4, presents the actual number of infractions found on 2018 informal complaints for the major local telephone companies by infraction category.

### Universal Service Programs

As part of its ongoing responsibilities, BCS monitors the universal service programs of local telephone companies and wireless companies. For the telephone industry, universal service programs<sup>6</sup> include Lifeline Service (Lifeline),<sup>7</sup> Lifeline 100 Service (Lifeline 100)<sup>8</sup> 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 telephone service by providing discounts or credits for telephone service. The Commission approved the implementation of Pennsylvania’s first universal service program for local telephone companies in 1989.<sup>9</sup> In December 1997, the Commission approved Lifeline service plans for 44 incumbent telephone companies which led to the statewide implementation of telephone companies’ 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.<sup>10</sup> The Final Order added an income-only based factor (income at or below 135 percent of the federal poverty guidelines) as a new criterion for Pennsylvania’s Lifeline program eligibility. Second, the Final Order directed all jurisdictional Eligible Telecommunication Carriers (ETCs)<sup>11</sup> to implement the Lifeline

<sup>6</sup> With the exception of UTAP, these programs are supported fully or in part by federal universal service funds.

<sup>7</sup> Lifeline f/k/a/ Lifeline 135 in previous UCARE reports

<sup>8</sup> Lifeline 100 f/k/a as Lifeline in previous UCARE reports

<sup>9</sup> The Link-Up America Program was the first universal service program. The FCC eliminated this program in 2012.

<sup>10</sup> FCC Report and Order and Further Notice of Proposed Rulemaking in the Matter of Lifeline and Link-Up, at CC Docket No. 04-87, WC Docket No. 03-109.

<sup>11</sup> Jurisdictional ETCs include all ILECs and other providers of communications services that have obtained ETC designation from the state commission or the FCC. ETCs may receive universal service funding.

provisions contained in Chapter 30. Under these provisions,<sup>12</sup> ETCs are to inform new and existing customers about the availability of Lifeline services. They also must permit eligible Lifeline service customers to purchase any number of optional services (i.e. call waiting) at the tariffed rates for these services.

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).<sup>13</sup> 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.<sup>14</sup>

On Mar. 2, 2012, the FCC issued a Final Rule<sup>15</sup> which reformed and began to modernize the federal USF Lifeline program. The reforms were intended to accomplish the following: (1) strengthen protections against waste, fraud and abuse; (2) improve program administration and accountability; (3) improve enrollment and consumer disclosures; (4) initiate modernization of the program for broadband; and (5) constrain the growth of the program to reduce the burden of all who contribute to the federal USF. In addition, the FCC identified numerous unserved census block groups in Pennsylvania where wireless ETCs were encouraged to bid to receive Mobility Fund Phase 1 support to build infrastructure over which to deliver 3G or better broadband and voice service. In October 2012, T-Mobile Northeast, LLC and NEP Cellcorp, Inc. won the bids to build the infrastructure in designated areas of Pennsylvania.

The Commission's Nov. 9, 2016, Order at Docket No. M-2016-2566383 adopted the eligibility criteria from the FCC's Lifeline and Link Up Reform and Modernization, Third Report and Order (2016 Order), WC Docket No. 11-42 released Apr. 27, 2016. Effective Dec. 2, 2016, eligibility for Lifeline support was streamlined to include the following programs: Supplemental Nutrition Assistance Program (SNAP), Medicaid, Supplemental Security Insurance (SSI), Federal Public Housing Assistance and Veterans Pension Benefits. The income-based eligibility (135 percent of Federal Poverty Guidelines) did not change. The Commission's order required jurisdictional ETCs 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;<sup>16</sup> (4) the establishment of a National Verifier; and (5) port freeze rules.<sup>17</sup>

On Dec. 1, 2017, the FCC released the Lifeline and Link Up Reform and Modernization Fourth Report and Order. In that order, the FCC determined that the disadvantages to consumers of the 2016 port freeze rules outweighed the benefits. As such effective Mar. 19, 2018, the FCC eliminated the port freeze rules. The

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<sup>12</sup> 66 Pa. C.S. §§ 3019 (f)(1-4).

<sup>13</sup> Docket No. M-2010-2164741, July 29, 2010, which codifies the guidelines at 52 Pa. Code § 69.2501.

<sup>14</sup> 47 C.F.R. §§ 214(e)(3-4) In a community where no telephone company provides services supported by federal universal support mechanisms, the FCC (for interstate) and PUC (for intrastate) will determine which telephone company is best able to provide such service. Any telephone company 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.

<sup>15</sup> 47 CFR Part 54 – Universal Service

<sup>16</sup> As of Dec. 1, 2018, 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.

<sup>17</sup> 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.

order also clarified that Wi-Fi is not a substitute for fixed broadband or mobile broadband delivered on a 3G or better network and is not eligible for Lifeline reimbursement.

Currently Lifeline is offered by ILECs, CLECs and some wireless carriers. As of Dec. 31, 2018, there were 403,790 low income Pennsylvania consumers enrolled in Lifeline. Wireless carriers provide Lifeline service to 389,408 of those consumers. The following table shows enrollment activity for the major telephone companies' Lifeline programs in 2016, 2017 and 2018.

### 2016-18 Lifeline Service Activity

Company	Total Number of Customers Who Received Lifeline Service			Total Number of Customers Enrolled as of December		
	2016	2017	2018	2016	2017	2018
CenturyLink	1,586	1,325	1,114	1,037	951	682
Frontier Commonwealth	1,292	1,159	1,002	1,016	917	762
Verizon North*	2,591	2,036	1,805	1,669	1,496	1,211
Verizon PA*	19,117	14,981	13,864	12,003	10,896	9,134
Windstream	2,641	1,939	1,571	1,550	1,389	1,018
<b>Total</b>	<b>27,227</b>	<b>21,440</b>	<b>19,356</b>	<b>17,275</b>	<b>15,649</b>	<b>12,807</b>

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

As of July 1, 2018, the monthly credit is \$9.25 for the Lifeline program, and \$11.75 for the Verizon companies' Lifeline 100 program.

### Universal Telephone Assistance Program

Verizon PA implemented a Universal Telephone Assistance Program (UTAP) along with its Lifeline service program as part of a settlement agreement that was approved by the Commission Aug. 4, 1995 (P-00930715, P-00950958). Verizon PA is the only company 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 telephone 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 2016, 2017 and 2018.

### 2016-18 Verizon PA Lifeline 100 and UTAP Summary

	2016	2017	2018
Total Number of Customers Enrolled as of December	4,341	4,144	3,560
Number of Customers Given Assistance	56	42	8
Amount of Funds Distributed	\$3,027	\$2,418	\$451
Average Grant Amount	\$54.05	\$57.57	\$56.38

## 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 company 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 companies that offer Lifeline programs.

## Wireless ETC Designation

In its 2005 First Universal Service Report and Order, the FCC established minimum requirements for telecommunications carriers to be designated as ETCs and encouraged states that exercise jurisdiction over ETC designation to adopt the same requirements.<sup>18</sup> 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 Universal Service Fund (USF) but did not make the company eligible for USF high-cost support.<sup>19</sup> 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.<sup>20</sup> On Dec. 22, 2010, Virgin Mobile USA, LP became the first wireless ETC designated by the PA PUC. The following table shows the wireless ETCs that operated in PA in 2018.

## National Lifeline Verifier

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

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

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<sup>18</sup> 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).

<sup>19</sup> See TracFone ETC Designation Order, CC Docket No. 96-45, Order, 23 FCC Rcd 6206 (released April 11, 2008).

<sup>20</sup> See 66 Pa. C.S. § 3019(f).

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](http://checklifeline.org).

### 2018 PA Wireless ETCs

Company	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
Blue Jay Wireless*	P-2012-2325045	8/29/2013
Boomerang Wireless d/b/a enTouch Wireless	P-2014-2421056	9/1/2016
Buffalo-Lake Erie d/b/a	P-2013-2382739	11/13/2014
Budget Prepay**	P-2011-2269524	6/21/2012
Global Connection Inc. d/b/a Stand Up Wireless	P-2011-2245213	9/13/2012
iWireless d/b/a Access Wireless	P-2011-2235119	9/3/2015
Limitless Mobile	P-2012-2287339	5/24/2012
Q-Link	P-2011-2275830	4/18/2013
Sage Telecom d/b/a TruConnect	P-2013-2398807	1/15/2015
Tag Mobile	P-2011-2241542	12/5/2012
Telrite Corp d/b/a Life Wireless	P-2011-2398807	9/26/2013
T-Mobile d/b/a InReach Wireless	P-2011-2275748	5/24/2012
Tracfone d/b/a Safelink***	n/a	n/a
Virgin Mobile d/b/a Assurance Wireless	P-2010-2155915	12/22/2010
YourTel America d/b/a TerraCom	P-2011-2226044	10/14/2011

\* On Oct. 11, 2018, the Commission issued a final order cancelling the ETC designation of Blue Jay Wireless.

\*\*Budget Prepay relinquished its ETC status effective Aug. 10, 2017.

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

## Chapter 30 Broadband

Act 183 of 2004 also addressed balancing the mandated deployment of broadband facilities without jeopardizing the provision of Universal Service. By this act, all ILECs were required to provide 100 percent broadband availability to their retail access lines by Dec. 31, 2015.

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 days of the request for broadband service and the service must meet the following speed requirements:

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

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

During 2017, BCS began tracking broadband complaints. The following table shows the total number of residential informal complaints in 2017 and 2018 for each of the five major telephone companies, compared to the number of complaints that included a dispute regarding broadband speed, access or availability.

**2017-18 Chapter 30 Broadband Complaints  
Residential Informal Complaints (Consumer Complaints and PARs)  
Major Local Telephone Companies**

Company	Total Number of Complaints		Total Number of Complaints with a Broadband Component		% of Complaints with a Broadband Component	
	2017	2018	2017	2018	2017	2018
CenturyLink	97	171	11	60	11%	35%
Frontier Commonwealth	121	148	25	88	21%	59%
Verizon North	52	71	8	29	15%	41%
Verizon PA	915	1,072	89	283	10%	26%
Windstream	150	165	28	49	19%	30%
<b>Total</b>	<b>1,335</b>	<b>1,627</b>	<b>161</b>	<b>509</b>	<b>12%</b>	<b>31%</b>

- Overall in 2018, 31 percent of the residential informal complaints for the major telephone companies included a dispute regarding broadband speed, access, or availability, compared to 12 percent in 2017.

# Glossary of Terms

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

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

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

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

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

**Customer Assistance Programs (CAPs)** - Payment assistance and debt forgiveness programs for payment-troubled households. CAPs are intended to provide affordable monthly bills based on a set energy burden standard. These lower rates are applied to ongoing usage as long as the household remains current and timely paying its monthly customer assistance payments. CAP rates may take the form of a discounted price on actual usage on either all or a portion of the usage, a percentage of the monthly bill, or a monthly amount that is calculated upon a percentage of the household income. Percentage of income plans are correlated directly to the household's income and the Commission-determined allowable energy burden percentage. 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 payments, the past debt is not collected and is eventually 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.

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

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

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

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

**Infraction** - A misapplication or infringement of a Commission 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** - Consumer contacts to BCS that, for the most part, require no follow-up investigation beyond the initial contact.

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

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

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

**Low-Income Usage Reduction Program (LIURP)** - 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.

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

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

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

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

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

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

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

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

# Appendices

## Appendix A

### Consumer Ratings of BCS Service

How quickly did the PUC handle your request?			
	2016	2017	2018
Very quickly	54%	42%	43%
Fairly quickly	27%	35%	31%
Not very quickly	8%	11%	12%
Not at all quickly	9%	9%	10%
Don't recall	1%	2%	1%
Have not heard from PUC	2%	1%	3%
How easy to understand was the information the PUC gave you about the outcome of the problem?			
	2016	2017	2018
Very easy	53%	47%	46%
Fairly easy	20%	19%	20%
Not very easy	3%	4%	4%
Not at all easy	2%	2%	3%
Don't recall	3%	4%	4%
Did not receive any information	19%	24%	23%
How polite was the first person you talked with at the PUC?			
	2016	2017	2018
Very polite	76%	76%	74%
Fairly polite	15%	15%	16%
Not very polite	3%	2%	2%
Not at all polite	2%	1%	2%
Don't recall	1%	1%	1%
Did not speak to anyone	4%	5%	5%
How interested in helping you was the first person you talked with at the PUC?			
	2016	2017	2018
Very interested	69%	66%	64%
Fairly interested	19%	21%	21%
Not very interested	4%	6%	7%
Not at all interested	4%	3%	3%
Don't recall	1%	1%	1%
Did not speak to anyone	2%	3%	4%
If you had another problem with a utility, would you contact the PUC again?			
	2016	2017	2018
Yes	85%	81%	79%
No	6%	9%	8%
Not sure	9%	10%	13%

## Appendix B

### Total Volume of Consumer Complaints and Payment Arrangement Requests to BCS in 2016-18

Industry	Consumer Complaints								Payment Arrangement Requests							
	Residential				Commercial				Residential				Commercial			
	2016	2017	2018	% Change 2016-18	2016	2017	2018	% Change 2016-18	2016	2017	2018	% Change 2016-18	2016	2017	2018	% Change 2016-18
Electric	5,890	8,038	9,116	55%	405	424	442	9%	34,812	29,942	31,299	-10%	237	128	149	-37%
Gas	1,566	2,126	2,706	73%	89	127	129	45%	13,796	12,399	12,912	-6%	73	44	125	71%
Water	714	873	1,334	87%	39	49	95	144%	3,864	3,543	4,145	7%	26	14	40	54%
Telephone	1,470	1,398	1,754	19%	192	179	190	-1%	81	60	36	-56%	4	3	0	-100%
Other*	3	1	96	3,100%	0	0	9	n/a	5	3	91	1,720%	0	0	0	0%
<b>Total</b>	<b>9,643</b>	<b>12,436</b>	<b>15,006</b>	<b>56%</b>	<b>725</b>	<b>779</b>	<b>865</b>	<b>19%</b>	<b>52,558</b>	<b>45,947</b>	<b>48,483</b>	<b>-8%</b>	<b>340</b>	<b>189</b>	<b>314</b>	<b>-8%</b>

\* Sewer and steam heat complaints are designated as "other."

## Appendix C

### 2018 Residential Informal Complaints (Consumer Complaints and PARs) for Companies Not Included in Industry Chapters

Company*	Number of Complaints	Total Number of Complaints Includes Secondary Company Complaints **
<b>ELECTRIC</b>		
Pike County Light and Power (EDC)	9	9
Other Electric Distribution Companies (EDCs)***	14	14
4 Choice Energy (EGS)	14	15
AEP Energy (EGS)	12	19
Agway Energy Services (EGS)	10	16
Alpha Gas & Electric (EGS)	0	8
Ambit Energy (EGS)	13	17
American Power & Gas of PA (EGS)	48	62
AP Gas and Electric (EGS)	36	50
Atlantic Energy (EGS)	12	14
Champion Energy Services (EGS)	5	5
Cirro Energy (EGS)	7	14
Clean Choice Energy (EGS)	6	12
Clearview Electric (EGS)	13	16
Discount Power (EGS)	9	11
Elec-Direct Energy Services (EGS)	48	67
Eligo Energy PA (EGS)	40	54
Energy Plus Holdings (EGS)	21	28
First Energy Solutions (EGS)	25	43
Frontier Utilities Northeast (EGS)	36	43
Great American Power (EGS)	10	21

\*Only those non-major companies having five or more complaints in 2018 are listed individually. Non-major companies having less than five residential complaints in 2018 are included in the appropriate general category for their industry, i.e. "Other Electric Distribution Companies" or "Other CLECs," etc.

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

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

## Appendix C (Continued)

### 2018 Residential Informal Complaints (Consumer Complaints and PARs) for Companies Not Included in Industry Chapters

Company*	Number of Complaints	Total Number of Complaints Includes Secondary Company Complaints **
<b>ELECTRIC (continued)</b>		
Green Mountain Energy (EGS)	67	86
Greenlight Energy (EGS)	9	10
IDT Energy (EGS)	11	16
Indra Energy (EGS)	30	37
Inspire Energy Holdings (EGS)	36	48
Interstate Gas Supply (EGS)	24	44
Josco Energy USA (EGS)	13	16
Just Energy PA (EGS)	0	6
Liberty Power (EGS)	14	16
Life Energy (EGS)	40	56
Mpower Energy NJ (EGS)	6	9
National Gas and Electric (EGS)	55	63
New Energy Ventured - Mid Atlantic (EGS)	18	34
Nextera Energy Service PA (EGS)	17	24
North American Power and Gas (EGS)	62	83
NRG Solutions (EGS)	121	158
Oasis Energy (EGS)	97	124
Park Power (EGS)	25	31
Pennsylvania Gas and Electric (EGS)	160	198
Planet Energy PA (EGS)	19	22
Public Power (EGS)	10	16

\*Only those non-major companies having five or more complaints in 2018 are listed individually. Non-major companies having less than five residential complaints in 2018 are included in the appropriate general category for their industry, i.e. "Other Electric Distribution Companies" or "Other CLECs," etc.

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

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

## Appendix C (Continued)

### 2018 Residential Informal Complaints (Consumer Complaints and PARs) for Companies Not Included in Industry Chapters

Company*	Number of Complaints	Total Number of Complaints Includes Secondary Company Complaints **
<b>ELECTRIC (continued)</b>		
Residents Energy (EGS)	14	19
Respond Power (EGS)	36	47
RPA Energy (EGS)	0	5
Rushmore Energy (EGS)	22	23
SFE Energy (EGS)	50	71
Shipleigh Oil Company (EGS)	10	12
Smartenergy.com (EGS)	27	45
Spark Energy (EGS)	17	23
Spring Power & Gas (EGS)	0	5
Star Energy Partners (EGS)	8	10
Starion Energy of PA (EGS)	21	28
Stream Energy (EGS)	44	56
Think Energy/Engie Retail (EGS)	26	30
Titan Gas and Power (EGS)	40	62
Tomorrow Energy (EGS)	119	141
Town Square Energy East (EGS)	19	24
TriEagle Energy (EGS)	28	35
Verde Energy USA (EGS)	94	137
Viridian Energy PA (EGS)	7	8
Vista Energy Marketing (EGS)	69	79

\*Only those non-major companies having five or more complaints in 2018 are listed individually. Non-major companies having less than five residential complaints in 2018 are included in the appropriate general category for their industry, i.e. "Other Electric Distribution Companies" or "Other CLECs," etc.

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

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

## Appendix C (Continued)

### 2018 Residential Informal Complaints (Consumer Complaints and PARs) for Companies Not Included in Industry Chapters

Company*	Number of Complaints	Total Number of Complaints Includes Secondary Company Complaints **
Xoom Energy PA (EGS)	32	42
YEP Energy (EGS)	14	19
Other Electric Generation Suppliers (EGSs)***	41	31
<b>Total Non-Major Electric</b>	<b>1,960</b>	<b>2,587</b>
<b>GAS</b>		
Peoples Gas Co. f/k/a Peoples TWP (NGDC)	151	151
UGI Central Penn Gas (NGDC)	622	633
Other Natural Gas Distribution Companies (NGDCs)***	9	10
Atlantic Energy (NGS)	0	7
Direct Energy Services (NGS)	0	5
Dominion Energy Solutions (NGS)	60	76
IGS Energy (Interstate Gas Supply) (NGS)	0	6
Indra Energy (NGS)	8	8
Major Energy (NGS)	12	14
North American Power & Gas (NGS)	6	8
NRG Home (NGS)	7	10
Pennsylvania Gas and Electric (NGS)	34	36
SFE Energy (NGS)	15	20
Vista Energy Marketing (NGS)	12	17
Other Natural Gas Suppliers (NGSs)***	51	50
<b>Total Non-Major Gas</b>	<b>987</b>	<b>1,051</b>

\*Only those non-major companies having five or more complaints in 2018 are listed individually. Non-major companies having less than five residential complaints in 2018 are included in the appropriate general category for their industry, i.e. "Other Electric Distribution Companies" or "Other CLECs," etc.

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

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

## Appendix C (Continued)

### 2018 Residential Informal Complaints (Consumer Complaints and PARs) for Companies Not Included in Industry Chapters

Company*	Number of Complaints
<b>WATER</b>	
Overbrook Water (WP)	9
Rock Springs Water (WP)	7
Other Private Water***	20
City of Lancaster (WM)	11
City of Philadelphia (WM)	6
Other Municipal Water***	10
<b>Total Non-Major Water</b>	<b>63</b>

\*Only those non-major companies having five or more complaints in 2018 are listed individually. Non-major companies having less than five residential complaints in 2018 are included in the appropriate general category for their industry, i.e. "Other Electric Distribution Companies" or "Other CLECs," etc.

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

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

## Appendix C (Continued)

### 2018 Residential Informal Complaints (Consumer Complaints and PARs) for Companies Not Included in Industry Chapters

Company*	Number of Complaints
<b>TELEPHONE</b>	
Frontier Communications ILEC Group	10
Other Incumbent Local Exchange Carriers (ILECs)***	12
AT&T Local (CLEC)	7
Frontier Communications CTSI (CLEC)	17
Full Service Network (CLEC)	8
Service Electric Telephone (CLEC)	6
Talk America Services (CLEC)	8
Other Competitive Local Exchange Carriers (CLECs)***	18
Assurance Wireless (Virgin Mobile) (ETC)	7
Comcast Digital Phone (VOIP)	5
Comcast Long Distance	5
Entouch Wireless (Boomerang) (ETC)	6
QLink Wireless (ETC)	7
Safelink Wireless (Tracfone) (ETC)	28
T-mobile (Inreach) (ETC)	5
Other Providers of Telecommunications Services***	14
<b>Total Non-Major Telephone</b>	<b>163</b>

\*Only those non-major companies having five or more complaints in 2018 are listed individually. Non-major companies having less than five residential complaints in 2018 are included in the appropriate general category for their industry, i.e. "Other Electric Distribution Companies" or "Other CLECs," etc.

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

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

## Appendix C (Continued)

### 2018 Residential Informal Complaints (Consumer Complaints and PARs) for Companies Not Included in Industry Chapters

Companies with Less Than Five Residential Complaints
<b>ELECTRIC</b>
<u>Other EDCs:</u> Borough of Schuylkill Haven, Borough of St. Clair, Citizens Electric Co. of Lewisburg and Wellsboro Electric
<u>Other EGSs:</u> Alpha Gas & Electric, Amerigreen Energy, Astral Energy, Bluerock Energy, Choose Energy, Constellation Energy Power Choice, Energy Co-Op, Energy Rewards/Comcast/Everyday Energy, Gateway Energy, Insight Energy, Just Energy Solutions, National Choice Energy, New Wave Energy, Santanna Energy Services, Southeast Energy Consultants and WGL Energy
<b>GAS</b>
<u>Other NGDCs:</u> Chartiers Natural Gas, Herman Oil & Gas, Pike County Light & Power, Pine-Roe Gas, Riemer Natural Gas and Valley Energy
<u>Other NGSs:</u> Agway Energy Services, Alpha Gas & Electric, Ambit Northeast, American Power & Gas of PA, Bluerock Energy, Frontier Utilities Northeast, Gateway Energy Services, Green Mountain Energy, Hiko Energy, IDT Energy, Josco Energy USA, Ntherm, Oasis Power, Pegasus Energy, Planet Energy, RPA Energy, Residents Energy, Shipley Energy, Stream Energy, Think Energy, Titan Gas & Power, Tomorrow Energy, Verde Energy USA PA, WGL Energy Services, Xoom Energy PA and Yep Energy
<b>WATER</b>
<u>Other Private Water:</u> Appalachian Utilities, Clyde A. Scott, Fairview Water, Imp. Pt. Water Services, Manwalamink Water, Oregon Hill Water/Sewer, Pennsylvania Utility Co., Plummer Water, Reynolds Water, Twin Lakes Water, W. Hickory Water and Winola Water Co.
<u>Other Municipal Water:</u> Borough of Dover, Borough of Phoenixville, Borough of Schuylkill Haven, City of Bethlehem, City of Erie and Hanover Water Works
<b>TELEPHONE</b>
<u>Other ILECs:</u> Armstrong Telephone Co., Consolidated Communications, Ironton Telephone, Laurel Highland Telephone, North Penn Telephone, North-Eastern PA Telephone and TDS Telecom
<u>Other CLECs:</u> ACN Communications Services, Atlantic Broadband, Clear Rate Communications, Lackawaxen Telephone, Level 3 Communications, Lingo Communications, Metropolitan Telecommunications, RCN Telecom of PA, Talk America and Zito Media Voice
<u>Other Providers of Telecommunications Services:</u> Access Wireless, AT and T, Budget Prepay, Life Wireless, MCI Local, NEP Cellcorp, Penteledata Limited Partnership, Sprint, Standup Wireless, Tag Mobile and Vartec Telecom

# Appendix D-1

## Classification of Consumer Complaints

### Electric, Gas & Water

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

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

**Credit & Deposits** - Complaints about a company's requirements to provide service: 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 company to return a deposit to the customer.

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

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

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

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

**Personnel Problems** - Complaints about performance by company personnel: a company representative did not finish the job correctly; a meter reader entered a customer's home to read the meter without knocking; company personnel will not perform a requested service; business office personnel treated the customer rudely; and 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 company's CAP program or procedures.

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

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

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

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

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

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

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

## Appendix D-2

### Classification of Consumer Complaints Telephone

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

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

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

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

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

**Non-Recurring Charges** - Complaints about one-time charges for installation of basic &/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 agreement.

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

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

**All Other Problems** - All other complaints that do not fit into the above categories, including complaints about audiotex (special phone entertainment or information services), excessive coin-phone rates, 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 consumer resolved the complaint with the company or because the consumer changed their mind about filing the complaint. In addition, some complaints, during investigation, were found to not fall under the PUC's jurisdiction.

## Appendix E - Table 1

### Consumer Complaint Categories: 2018\*

#### Major Electric Distribution Companies

Categories**	Duquesne	Met-Ed ***	PECO ***+	Penelec ***	Penn Power	PPL ***	UGI- Electric	West Penn***	Electric Total
Billing Disputes	68	71	73	94	42	105	22	83	558
Termination or PAR Procedures	105	34	62	54	32	68	11	39	405
Personnel Problems	51	61	63	59	19	53	6	63	375
Service Interruptions	12	96	111	29	8	19	0	54	329
Credit and Deposits	33	61	37	56	36	15	3	56	297
Metering	20	58	7	41	4	40	4	78	252
Damages	7	21	33	23	15	27	0	46	172
Discontinuance/Transfer	42	19	20	14	11	45	4	14	169
Service Quality	12	37	27	20	4	19	3	22	144
Other Payment Issues	29	10	13	24	13	15	3	16	123
Scheduling Delays	7	8	3	5	0	8	1	4	36
Service Extensions	1	10	2	9	1	3	0	10	36
Rates	5	0	2	4	1	4	2	2	20
All Other Problems	9	4	13	9	8	9	1	10	63
<b>Total</b>	<b>401</b>	<b>490</b>	<b>466</b>	<b>441</b>	<b>194</b>	<b>430</b>	<b>60</b>	<b>497</b>	<b>2,979</b>

\* Categories are for residential complaints opened in 2018 and evaluated by BCS as of June 21, 2019.

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

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

+ PECO statistics include electric and gas.

**Appendix E - Table 2**  
**Consumer Complaint Categories: 2018\***  
**Major Natural Gas Distribution Companies**

Categories**	Columbia	NFG	Peoples	Peoples-Equitable	PGW***	UGI-Gas	UGI Penn Natural	Gas Total
Termination or PAR Procedures	20	19	27	23	66	59	43	<b>257</b>
Personnel Problems	26	9	35	33	96	40	16	<b>255</b>
Billing Disputes	21	9	20	15	86	48	40	<b>239</b>
Discontinuance/Transfer	3	7	7	10	70	15	13	<b>125</b>
Other Payment Issues	4	3	9	14	34	40	12	<b>116</b>
Metering	3	16	12	4	27	14	32	<b>108</b>
Service Quality	9	2	29	16	2	20	8	<b>86</b>
Damages	9	1	10	11	14	11	5	<b>61</b>
Scheduling Delays	2	5	7	7	9	14	3	<b>47</b>
Credit and Deposits	2	2	4	5	12	10	6	<b>41</b>
Service Extensions	5	3	2	3	2	9	6	<b>30</b>
Rates	3	0	1	0	4	2	1	<b>11</b>
Service Interruptions	1	1	3	3	0	0	2	<b>10</b>
All Other Problems	2	1	6	1	5	6	1	<b>22</b>
<b>Total</b>	<b>110</b>	<b>78</b>	<b>172</b>	<b>145</b>	<b>427</b>	<b>288</b>	<b>188</b>	<b>1,408</b>

\* Categories are for residential complaints opened in 2018 evaluated by BCS as of June 21, 2019.

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

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

## Appendix E - Table 3

### Consumer Complaint Categories: 2018\*

#### Major Water Companies

Categories**	Aqua	PAWC ***	Large Class A Total	Audubon	Columbia	Community Utilities+	Newtown Artesian	SUEZ Bethel	SUEZ PA	York	"Other Class A" Total	All Class A Water Total
Billing Disputes	90	99	189	0	1	4	0	0	15	12	32	221
Termination or PAR Procedures	38	86	124	0	0	1	1	0	0	3	5	129
Service Quality	28	73	101	1	0	0	0	0	9	1	11	112
Metering	39	32	71	0	0	0	0	0	5	1	6	77
Damages	13	51	64	0	0	0	0	0	2	0	2	66
Discontinuance/Transfer	10	21	31	0	0	0	0	0	1	3	4	35
Service Interruptions	4	26	30	0	0	0	0	0	2	0	2	32
Personnel Problems	8	17	25	0	0	0	0	0	0	1	1	26
Rates	7	5	12	0	0	0	0	0	1	0	1	13
Other Payment Issues	3	5	8	0	0	0	0	0	2	0	2	10
Credit and Deposits	4	4	8	0	0	0	0	0	0	0	0	8
Scheduling Delays	1	3	4	0	0	0	0	0	0	0	0	4
Service Extensions	1	2	3	0	0	0	0	0	0	0	0	3
All Other Problems	2	4	6	0	1	0	0	0	0	0	1	7
<b>Total</b>	<b>248</b>	<b>428</b>	<b>676</b>	<b>1</b>	<b>2</b>	<b>5</b>	<b>1</b>	<b>0</b>	<b>37</b>	<b>21</b>	<b>67</b>	<b>743</b>

\* Categories are for residential complaints opened in 2018 and evaluated by BCS as of June 21, 2019.

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

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

+ Community Utilities was reclassified as a Class A water company in 2018.

**Appendix E - Table 4**  
**Consumer Complaint Categories: 2018\***  
**Major Local Telephone Companies**

Categories**	CenturyLink	Frontier Common-wealth	Verizon North	Verizon PA***	Windstream	Telephone Total
Unsatisfactory Service	117	89	45	292	128	<b>671</b>
Billing Disputes	6	10	6	44	3	<b>69</b>
Service Delivery	6	9	0	25	3	<b>43</b>
Service Terminations	3	2	1	8	2	<b>16</b>
Competition	0	1	0	7	1	<b>9</b>
Discontinuance/Transfer	0	5	0	2	0	<b>7</b>
Non-Recurring Charges	0	2	2	2	0	<b>6</b>
Credit and Deposits	2	1	0	0	0	<b>3</b>
Toll Services	0	1	1	0	0	<b>2</b>
Annoyance Calls	0	0	0	0	0	<b>0</b>
All Other Problems	9	9	3	47	5	<b>73</b>
<b>Total</b>	<b>143</b>	<b>129</b>	<b>58</b>	<b>427</b>	<b>142</b>	<b>899</b>

\* Categories are for residential complaints opened in 2018 and evaluated by BCS as of June 21, 2019.

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

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

## Appendix F - Table 1

### 2016-18 Residential Consumer Complaint Statistics Major Electric Distribution Companies

Company Name	2018 Residential Customers	Residential Consumer Complaints to BCS				Consumer Complaint Rates <sup>1</sup>			Justified Consumer Complaints					
		2016	2017	2018	% Change in # 2016-18	2016	2017	2018	Numbers <sup>2</sup> / Rates <sup>3</sup> 2016		Numbers <sup>2</sup> / Rates <sup>3</sup> 2017		Numbers <sup>2</sup> / Rates <sup>3</sup> 2018	
Duquesne	535,487	590	583	596	1%	1.12	1.10	1.11	46	0.09	41	0.08	76	0.14
Met-Ed	502,110	747	1,093	1,185	59%	1.51	2.19	2.36	86*	0.17*	132*	0.26*	102*	0.20*
PECO <sup>5</sup>	1,492,306	929	1,308	1,869	101%	0.63	0.88	1.25	78*	0.05*	69*	0.05*	237*	0.16*
Penelec	501,456	677	1,014	938	39%	1.35	2.02	1.87	77*	0.15*	128*	0.26*	49*	0.10*
Penn Power	145,285	323	230	255	-21%	2.25	1.59	1.76	32	0.22	26	0.18	22	0.15
PPL	1,227,683	617	1,057	1,146	86%	0.50	0.86	0.93	52*	0.04*	84*	0.07*	109*	0.09*
UGI-Electric	55,225	36	39	76	111%	0.65	0.70	1.38	1	0.02	5	0.09	15	0.27
West Penn	626,454	803	1,120	1,283	60%	1.29	1.79	2.05	92*	0.15*	127*	0.20*	98*	0.16*
<b>Total</b>	<b>5,086,006</b>	<b>4,722</b>	<b>6,444</b>	<b>7,348</b>	<b>56%</b>				<b>464</b>		<b>609</b>		<b>708</b>	
<b>Average of Rates</b>						<b>1.24<sup>4</sup></b>	<b>1.49<sup>4</sup></b>	<b>1.62<sup>4</sup></b>		<b>0.13<sup>4</sup></b>		<b>0.16<sup>4</sup></b>		<b>0.14<sup>4</sup></b>

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

<sup>2</sup> Estimated based on the number of cases in CSIS as of June 21, 2019.

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

<sup>4</sup> Does not include UGI-Electric.

<sup>5</sup> PECO statistics include electric and gas.

\* Based on a probability sample of cases.

**Appendix F - Table 2**  
**2016-18 Residential Consumer Complaint Statistics**  
**Major Natural Gas Distribution Companies**

Company Name	2018 Residential Customers	Residential Consumer Complaints to BCS				Consumer Complaint Rates <sup>1</sup>			Justified Consumer Complaints					
		2016	2017	2018	% Change in # 2016-18	2016	2017	2018	Numbers <sup>2</sup> / Rates <sup>3</sup> 2016		Numbers <sup>2</sup> / Rates <sup>3</sup> 2017		Numbers <sup>2</sup> / Rates <sup>3</sup> 2018	
Columbia	396,835	126	179	159	26%	0.32	0.45	0.40	8	0.02	3	0.01	3	0.01
NFG	197,108	54	112	112	107%	0.27	0.57	0.57	3	0.02	7	0.04	9	0.05
Peoples	334,790	159	206	233	47%	0.48	0.62	0.70	6	0.02	1	0.00	7	0.02
Peoples-Equitable	248,408	118	150	199	69%	0.48	0.61	0.80	9	0.04	3	0.01	10	0.04
PGW	477,533	776	980	1,054	36%	1.64	2.06	2.21	173*	0.37*	66*	0.14*	74*	0.15*
UGI-Gas	361,789	130	178	358	175%	0.38	0.50	0.99	6	0.02	9	0.03	50	0.14
UGI Penn Natural	156,555	76	110	233	207%	0.50	0.71	1.49	5	0.03	6	0.04	45	0.29
<b>Total</b>	<b>2,173,018</b>	<b>1,439</b>	<b>1,915</b>	<b>2,348</b>	<b>63%</b>				<b>210</b>		<b>95</b>		<b>198</b>	
<b>Average of Rates</b>						<b>0.58</b>	<b>0.79</b>	<b>1.02</b>		<b>0.07</b>		<b>0.04</b>		<b>0.10</b>

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

<sup>2</sup> Estimated based on the number of cases in CSIS as of June 21, 2019.

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

\* Based on a probability sample of cases.

## Appendix F - Table 3

### 2016-18 Residential Consumer Complaint Statistics

#### Major Water Companies

Company Name	2018 Residential Customers	Residential Consumer Complaints to BCS				Consumer Complaint Rates <sup>1</sup>			Justified Consumer Complaints					
		2016	2017	2018	% Change in # 2016-18	2016	2017	2018	Numbers <sup>2</sup> / Rates <sup>3</sup> 2016		Numbers <sup>2</sup> / Rates <sup>3</sup> 2017		Numbers <sup>2</sup> / Rates <sup>3</sup> 2018	
Aqua	401,219	207	255	294	42%	0.52	0.64	0.73	45	0.11	76	0.19	64	0.16
PAWC	608,928	420	542	755	80%	0.70	0.89	1.24	72	0.12	85	0.14	129*	0.21*
<b>Large Class A Total</b>	<b>1,010,147</b>	<b>627</b>	<b>797</b>	<b>1,049</b>	<b>67%</b>				<b>117</b>		<b>161</b>		<b>193</b>	
<b>Large Class A Average of Rates</b>						<b>0.61</b>	<b>0.77</b>	<b>0.99</b>		<b>0.12</b>		<b>0.17</b>		<b>0.19</b>
Audubon	2,728	3	0	1	-67%	1.15	0.00	0.37	2	0.77	0	0.00	0	0.00
Columbia	9,663	3	3	2	-33%	0.32	0.31	0.21	0	0.00	0	0.00	0	0.00
Community Utilities <sup>4</sup>	2,624	n/a	n/a	5	n/a	n/a	n/a	1.91	n/a	n/a	n/a	n/a	0	0.00
Newtown Artesian	9,373	1	0	1	0%	0.10	0.00	0.11	0	0.00	0	0.00	1	0.11
SUEZ Bethel	2,432	0	0	0	0%	0.00	0.00	0.00	0	0.00	0	0.00	0	0.00
SUEZ PA	54,936	31	27	40	29%	0.58	0.54	0.73	2	0.04	1	0.02	8	0.15
York	61,603	23	15	24	4%	0.38	0.25	0.39	1	0.02	0	0.00	1	0.02
<b>"Other Class A" Total</b>	<b>143,359</b>	<b>61</b>	<b>45</b>	<b>73</b>	<b>20%</b>				<b>5</b>		<b>1</b>		<b>10</b>	
<b>"Other Class A" Avg. of Rates<sup>5</sup></b>						<b>0.44</b>	<b>0.33</b>	<b>0.51</b>		<b>0.04</b>		<b>0.01</b>		<b>0.07</b>
<b>All Class A Total</b>	<b>1,153,506</b>	<b>688</b>	<b>842</b>	<b>1,122</b>	<b>63%</b>				<b>122</b>		<b>162</b>		<b>203</b>	
<b>All Class A Average of Rates<sup>6</sup></b>						<b>0.56</b>	<b>0.62</b>	<b>0.83</b>		<b>0.09</b>		<b>0.11</b>		<b>0.15</b>

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

<sup>2</sup> Estimated based on the number of cases in CSIS as of June 21, 2019.

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

<sup>4</sup> Community Utilities was reclassified as a Class A water company in 2018.

<sup>5</sup> Calculated based on the rate of "Other Class A" companies as a whole.

<sup>6</sup> Calculated based on the rates of Aqua, PAWC and "Other Class A" companies as a whole.

\* Based on a probability sample of cases.

**Appendix F - Table 4**  
**2016-18 Residential Consumer Complaint Statistics**  
**Major Local Telephone Companies**

Company Name	2018 Residential Customers	Residential Consumer Complaints to BCS				Consumer Complaint Rates <sup>1</sup>			Justified Consumer Complaints					
		2016	2017	2018	% Change in # 2016-18	2016	2017	2018	Numbers <sup>2</sup> / Rates <sup>3</sup> 2016		Numbers <sup>2</sup> / Rates <sup>3</sup> 2017		Numbers <sup>2</sup> / Rates <sup>3</sup> 2018	
CenturyLink	114,601	62	92	168	171%	0.48	0.72	1.47	29	0.23	39	0.31	108	0.94
Frontier Commonwealth	87,348	85	113	145	71%	0.84	1.19	1.66	47	0.46	74	0.78	97	1.11
Verizon North	107,673	68	52	69	1%	0.45	0.41	0.64	37	0.25	20	0.16	39	0.36
Verizon PA	510,221	1,070	877	1,051	-2%	1.43	1.40	2.06	366*	0.49*	379	0.60	596	1.17
Windstream	78,396	92	144	162	76%	1.01	1.72	2.07	63	0.69	99	1.18	111	1.42
<b>Total</b>	<b>898,239</b>	<b>1,377</b>	<b>1,278</b>	<b>1,595</b>	<b>16%</b>				<b>542</b>		<b>611</b>		<b>951</b>	
<b>Average of Rates</b>						<b>0.84</b>	<b>1.09</b>	<b>1.58</b>		<b>0.42</b>		<b>0.61</b>		<b>1.00</b>

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

<sup>2</sup> Estimated based on the number of cases in CSIS as of June 21, 2019.

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

\* Based on a probability sample of cases.

## Appendix G - Table 1

### 2016-18 Residential Payment Arrangement Request (PAR) Statistics Major Electric Distribution Companies

Company Name	2018 Residential Customers	Residential PARs to BCS				PAR Rates <sup>1</sup>			Justified PARs					
		2016	2017	2018	% Change in # 2016-18	2016	2017	2018	Numbers <sup>2</sup> / Rates <sup>3</sup> 2016		Numbers <sup>2</sup> / Rates <sup>3</sup> 2017		Numbers <sup>2</sup> / Rates <sup>3</sup> 2018	
Duquesne	535,487	2,284	1,784	2,178	-5%	4.34	3.35	4.07	120	0.23	125	0.23	198	0.37
Met-Ed	502,110	4,433	3,706	3,865	-13%	8.94	7.42	7.07	503	1.01	500	1.00	418	0.83
PECO <sup>5</sup>	1,492,306	6,034	5,831	6,349	5%	4.12	3.94	4.25	410	0.28	605	0.41	933	0.63
Penelec	501,456	4,644	4,042	4,061	-13%	9.25	8.06	8.10	458	0.91	446	0.89	547	1.09
Penn Power	145,285	1,575	1,169	1,091	-31%	10.97	8.10	7.51	140	0.98	131	0.91	147	1.01
PPL	1,227,683	11,528	9,445	9,084	-21%	9.36	7.72	7.40	831	0.67	1,149	0.94	1,014	0.83
UGI-Electric	55,225	540	348	469	-13%	9.68	6.25	8.49	35	0.63	30	0.54	57	1.03
West Penn	626,454	3,254	3,425	4,010	23%	5.22	5.48	6.40	208	0.33	234	0.37	355	0.57
<b>Total</b>	<b>5,086,006</b>	<b>34,292</b>	<b>29,750</b>	<b>31,107</b>	<b>-9%</b>				<b>2,705</b>		<b>3,220</b>		<b>3,669</b>	
<b>Average of Rates</b>						<b>7.46<sup>4</sup></b>	<b>6.30<sup>4</sup></b>	<b>6.49<sup>4</sup></b>		<b>0.63<sup>4</sup></b>		<b>0.68<sup>4</sup></b>		<b>0.76<sup>4</sup></b>

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

<sup>2</sup> With the exception of UGI-Electric, each company's number of justified PARs is estimated based on a probability sample of cases. The number of justified PARs for all EDCs is based on the number of cases in CSIS as of June 21, 2019.

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

<sup>4</sup> Does not include UGI-Electric.

<sup>5</sup> PECO statistics include electric and gas.

## Appendix G - Table 2

### 2016-18 Residential Payment Arrangement Request (PAR) Statistics Major Natural Gas Distribution Companies

Company Name	2018 Residential Customers	Residential PARs to BCS				PAR Rates <sup>1</sup>			Justified PARs					
		2016	2017	2018	% Change in # 2016-18	2016	2017	2018	Numbers <sup>2</sup> / Rates <sup>3</sup> 2016		Numbers <sup>2</sup> / Rates <sup>3</sup> 2017		Numbers <sup>2</sup> / Rates <sup>3</sup> 2018	
Columbia	396,835	684	553	535	-22%	1.75	1.41	1.35	12	0.03	6	0.02	9	0.02
NFG	197,108	332	540	587	77%	1.68	2.74	2.98	13	0.07	21	0.11	45	0.23
Peoples	334,790	698	661	710	2%	2.10	1.98	2.12	16	0.05	23	0.07	50	0.15
Peoples-Equitable	248,408	445	524	616	38%	1.83	2.11	2.48	31	0.13	22	0.09	38	0.15
PGW	477,533	7,558	7,701	6,112	-19%	15.98	16.21	12.80	293*	0.62*	381*	0.80*	610*	1.28*
UGI-Gas	361,789	2,182	1,310	2,305	6%	6.31	3.71	6.37	129*	0.37*	98*	0.28*	228*	0.63*
UGI Penn Natural	156,555	1,358	721	1,418	4%	8.89	4.67	9.06	143*	0.94*	43	0.28	221*	1.41*
<b>Total</b>	<b>2,173,018</b>	<b>13,257</b>	<b>12,010</b>	<b>12,283</b>	<b>-7%</b>				<b>637</b>		<b>594</b>		<b>1,201</b>	
<b>Average of Rates</b>						<b>5.51</b>	<b>4.69</b>	<b>5.31</b>		<b>0.31</b>		<b>0.23</b>		<b>0.55</b>

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

<sup>2</sup> The number of justified PARs for all NGDCs is based on the number of cases in CSIS as of June 21, 2019.

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

\* Estimated based on a probability sample of cases.

## Appendix G - Table 3

### 2016-18 Residential Payment Arrangement Request (PAR) Statistics Major Water Companies

Company Name	2018 Residential Customers	Residential PARs to BCS				PAR Rates <sup>1</sup>			Justified PARs					
		2016	2017	2018	% Change in # 2016-18	2016	2017	2018	Numbers <sup>2</sup> / Rates <sup>3</sup> 2016		Numbers <sup>2</sup> / Rates <sup>3</sup> 2017		Numbers <sup>2</sup> / Rates <sup>3</sup> 2018	
Aqua	401,219	701	639	591	-16%	1.77	1.60	1.47	43	0.11	52	0.13	58	0.14
PAWC	608,928	2,907	2,687	3,248	12%	4.85	4.43	5.33	359*	0.60*	463*	0.76*	642*	1.05*
<b>Large Class A Total</b>	<b>1,010,147</b>	<b>3,608</b>	<b>3,326</b>	<b>3,839</b>	<b>6%</b>				<b>402</b>		<b>515</b>		<b>700</b>	
<b>Large Class A Average of Rates</b>						<b>3.31</b>	<b>3.02</b>	<b>3.40</b>		<b>0.35</b>		<b>0.45</b>		<b>0.60</b>
Audubon	2,728	0	1	1	n/a	0.00	0.39	0.37	0	0.00	0	0.00	0	0.00
Columbia	9,663	30	29	28	-7%	3.16	3.02	2.90	0	0.00	0	0.00	0	0.00
Community Utilities <sup>4</sup>	2,624	n/a	n/a	4	n/a	n/a	n/a	1.52	n/a	n/a	n/a	n/a	0	0.00
Newtown Artesian	9,373	0	1	0	0%	0.00	0.10	0.00	0	0.00	0	0.00	0	0.00
SUEZ Bethel	2,432	0	0	0	0%	0.00	0.00	0.00	0	0.00	0	0.00	0	0.00
SUEZ PA	54,936	84	51	52	-38%	1.56	1.02	0.95	2	0.04	4	0.08	2	0.04
York	61,603	106	98	81	-24%	1.77	1.61	1.31	5	0.08	0	0.00	3	0.05
<b>"Other Class A" Total</b>	<b>143,359</b>	<b>220</b>	<b>180</b>	<b>166</b>	<b>-25%</b>				<b>7</b>		<b>4</b>		<b>5</b>	
<b>"Other Class A" Avg. of Rates<sup>5</sup></b>						<b>1.60</b>	<b>1.34</b>	<b>1.16</b>		<b>0.06</b>		<b>0.03</b>		<b>0.03</b>
<b>All Class A Total</b>	<b>1,153,506</b>	<b>3,828</b>	<b>3,506</b>	<b>4,005</b>	<b>5%</b>				<b>409</b>		<b>519</b>		<b>705</b>	
<b>All Class A Average of Rates<sup>6</sup></b>						<b>2.74</b>	<b>2.46</b>	<b>2.65</b>		<b>0.26</b>		<b>0.31</b>		<b>0.41</b>

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

<sup>2</sup> Estimated based on a probability sample of cases and the number of cases in CSIS as of June 21, 2019.

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

<sup>4</sup> Community Utilities was reclassified as a Class A water company in 2018.

<sup>5</sup> Calculated based on the rate of "Other Class A" companies as a whole.

<sup>6</sup> Calculated based on the rates of Aqua, PAWC and "Other Class A" companies as a whole.

\* Based on a probability sample of cases.

## Appendix G - Table 4

### 2016-18 Residential Payment Agreement Request (PAR) Statistics Major Local Telephone Companies

Company Name	2018 Residential Customers	Residential PARs to BCS				PAR Rates <sup>1</sup>			Justified PARs					
		2016	2017	2018	% Change in # 2016-18	2016	2017	2018	Numbers <sup>2</sup> / Rates <sup>3</sup> 2016		Numbers <sup>2</sup> / Rates <sup>3</sup> 2017		Numbers <sup>2</sup> / Rates <sup>3</sup> 2018	
CenturyLink	114,601	11	5	3	-73%	0.09	0.04	0.03	2	0.02	1	0.01	0	0.00
Frontier Commonwealth	87,348	6	8	3	-50%	0.06	0.08	0.03	2	0.02	1	0.01	2	0.02
Verizon North	107,673	1	0	2	100%	0.01	0.00	0.02	0	0.00	0	n/a <sup>4</sup>	0	0.00
Verizon PA	510,221	56	38	21	-63%	0.07	0.06	0.04	14	0.02	1	0.00	1	0.00
Windstream	78,396	4	6	3	-25%	0.04	0.07	0.04	1	0.01	2	0.02	0	0.00
<b>Total</b>	<b>898,239</b>	<b>78</b>	<b>57</b>	<b>32</b>	<b>-59%</b>				<b>19</b>		<b>5</b>		<b>3</b>	
<b>Average of Rates</b>						<b>0.05</b>	<b>0.05</b>	<b>0.03</b>		<b>0.01</b>		<b>0.01<sup>4</sup></b>		<b>0.00</b>

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

<sup>2</sup> Estimated based on the number of cases in CSIS as of June 21, 2019.

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

<sup>4</sup> No PARs were received for Verizon North in 2017, so its justified PAR rate could not be calculated; therefore, the calculation of the industry average excludes Verizon North.

**Appendix H – Table 1**  
**Chapter 56, Chapter 14 and Other Infraction Categories: 2018\***  
**Major Electric Distribution Companies**

Description	Duquesne		Met-Ed		PECO+		Penelec		Penn Power		PPL		UGI-Electric		West Penn	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Billing and Payment (56.2-Def. of Billing Month, 56.2-Def. of Billing Period, 56.11, 56.12(7), 56.15, 56.21, 56.22, 56.24 and 56.25)	4	4%	3	5%	0	0%	5	9%	1	3%	34	26%	2	11%	6	7%
Meter Reading (56.12(1)-(6))	0	0%	3	5%	1	2%	0	0%	0	0%	16	12%	2	11%	11	13%
Make-Up Bills (56.14, 57.24, 59.22 and 65.9)	5	5%	1	2%	0	0%	1	2%	3	10%	15	11%	2	11%	4	5%
Transfer of Accounts (56.16, 56.36(b)(3) and 56.72)	1	1%	3	5%	0	0%	1	2%	0	0%	0	0%	2	11%	4	5%
Credit Standards and Deposits (56.31-35, 56.36(b)(1)-(2), 56.37, 56.41, 56.42, 56.51, 56.53 and 1404)	8	7%	7	12%	6	14%	8	15%	7	23%	2	2%	0	0%	14	16%
Termination Grounds (56.2-Def. of Delinquent Acct., 56.81-83 and 56.100)	8	7%	2	3%	4	9%	2	4%	1	3%	9	7%	1	6%	0	0%
Termination Procedures (56.91-97, 56.112, 56.114 and 1406)	11	10%	1	2%	4	9%	1	2%	3	10%	4	3%	1	6%	0	0%
Reconnection of Service (56.115 and 56.191(a)-(c))	0	0%	2	3%	5	11%	3	5%	2	6%	5	4%	0	0%	2	2%
Liability - Responsibility for Bills (56.2-Def. of Applicant, 56.2-Def. of Customer, 56.191(d)-(e) and 56.285)	2	2%	0	0%	0	0%	2	4%	0	0%	0	0%	0	0%	0	0%
Landlord/Ratepayer (1521-1533)	0	0%	0	0%	0	0%	0	0%	0	0%	3	2%	0	0%	0	0%
Dispute Handling (56.2-Def. of Dispute, 56.2-Def. of Initial Inquiry, 56.141-152 and 56.181)	70	63%	32	54%	18	41%	28	51%	13	42%	33	25%	8	44%	27	31%
Other (54.73, 56.1, 56.202, 57.20, 1410.1, 1417 and 1501)	2	2%	5	8%	6	14%	4	7%	1	3%	12	9%	0	0%	19	22%
<b>Total</b>	<b>111</b>		<b>59</b>		<b>44</b>		<b>55</b>		<b>31</b>		<b>133</b>		<b>18</b>		<b>87</b>	

\* # equals the number of verified infractions identified by BCS as of Aug. 19, 2019.  
 % equals the percent of the total number of infractions for a particular company.  
 + PECO statistics include electric and gas.

## Appendix H – Table 2

### Chapter 56, Chapter 14 and Other Infraction Categories: 2018\* Major Natural Gas Distribution Companies

Description	Columbia		NFG		Peoples		Peoples-Equitable		PGW		UGI – Gas		UGI Penn Natural	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Billing and Payment (56.2-Def. of Billing Month, 56.2-Def. of Billing Period, 56.11, 56.12(7), 56.15, 56.21, 56.22, 56.24 and 56.25)	0	0%	0	0%	1	9%	0	0%	12	16%	11	20%	11	22%
Meter Reading (56.12(1)-(6))	0	0%	0	0%	1	9%	0	0%	0	0%	0	0%	0	0%
Make-Up Bills (56.14, 57.24, 59.22 and 65.9)	0	0%	1	11%	0	0%	0	0%	7	9%	5	9%	2	4%
Transfer of Accounts (56.16, 56.36(b)(3) and 56.72)	0	0%	1	11%	1	9%	2	33%	3	4%	1	2%	2	4%
Credit Standards and Deposits (56.31-35, 56.36(b)(1)-(2), 56.37, 56.41, 56.42, 56.51, 56.53 and 1404)	0	0%	1	11%	1	9%	2	33%	6	8%	3	5%	1	2%
Termination Grounds (56.2-Def. of Delinquent Acct., 56.81-83 and 56.100)	0	0%	1	11%	0	0%	0	0%	5	7%	12	21%	1	2%
Termination Procedures (56.91-97, 56.112, 56.114 and 1406)	0	0%	0	0%	1	9%	0	0%	1	1%	3	5%	1	2%
Reconnection of Service (56.115 and 56.191(a)-(c))	0	0%	0	0%	1	9%	0	0%	7	9%	3	5%	1	2%
Liability - Responsibility for Bills (56.2-Def. of Applicant, 56.2-Def. of Customer, 56.191(d)-(e) and 56.285)	0	0%	0	0%	0	0%	1	17%	1	1%	2	4%	0	0%
Landlord/Ratepayer (1521-1533)	0	0%	0	0%	1	9%	0	0%	0	0%	0	0%	0	0%
Dispute Handling (56.2-Def. of Dispute, 56.2-Def. of Initial Inquiry, 56.141-152 and 56.181)	0	0%	5	56%	4	36%	1	17%	28	37%	16	29%	32	63%
Other (56.1, 62.4, 1410.1 and 1501)	2	100%	0	0%	0	0%	0	0%	6	8%	0	0%	0	0%
<b>Total</b>	<b>2</b>		<b>9</b>		<b>11</b>		<b>6</b>		<b>76</b>		<b>56</b>		<b>51</b>	

\* # equals the number of verified infractions identified by BCS as of Aug. 19, 2019.

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

## Appendix H - Table 3

### Chapter 56, Chapter 14 and Other Infraction Categories: 2018\* Major Water Companies

Description	Aqua		PAWC		Audubon		Columbia		Community Utilities+		Newtown Artesian		SUEZ Bethel		SUEZ PA		York	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Billing and Payment (56.2-Def. of Billing Month, 56.2-Def. of Billing Period, 56.11, 56.12(7), 56.15, 56.21, 56.22, 56.24 and 56.25)	2	2%	5	3%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Meter Reading (56.12(1)-(6))	0	0%	3	2%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Make-Up Bills (56.14, 57.24, 59.22 and 65.9)	11	9%	5	3%	0	0%	0	0%	0	0%	0	0%	0	0%	2	20%	0	0%
Transfer of Accounts (56.16, 56.36(b)(3) and 56.72)	1	1%	1	1%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Credit Standards and Deposits (56.31-35, 56.36(b)(1)-(2), 56.37, 56.41, 56.42, 56.51, 56.53 and 1404)	4	3%	2	1%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Termination Grounds (56.2-Def. of Delinquent Acct., 56.81-83 and 56.100)	6	5%	14	9%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Termination Procedures (56.91-97, 56.112, 56.114 and 1406)	2	2%	5	3%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Reconnection of Service (56.115 and 56.191(a)-(c))	1	1%	4	3%	0	0%	1	100%	0	0%	0	0%	0	0%	0	0%	0	0%
Liability - Responsibility for Bills (56.2-Def. of Applicant, 56.2-Def. of Customer, 56.191(d)-(e) and 56.285)	1	1%	1	1%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Landlord/Ratepayer (1521-1533)	1	1%	6	4%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Dispute Handling (56.2-Def. of Dispute, 56.2-Def. of Initial Inquiry, 56.141-152 and 56.181)	91	73%	90	60%	0	0%	0	0%	0	0%	1	100%	0	0%	7	70%	2	100%
Other (56.1, 56.71, 56.202, 65.8, 1501 and Tariff)	4	3%	15	10%	0	0%	0	0%	0	0%	0	0%	0	0%	1	10%	0	0%
<b>Total</b>	<b>124</b>		<b>151</b>		<b>0</b>		<b>1</b>		<b>0</b>		<b>1</b>		<b>0</b>		<b>10</b>		<b>2</b>	

\* # equals the number of verified infractions identified by BCS as of Aug. 19, 2019.

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

+ Community Utilities was reclassified as a Class A water company in 2018.

**Appendix H – Table 4**  
**Chapter 30, Chapter 63, Chapter 64 and Other Infraction Categories: 2018\***  
**Major Local Telephone Companies**

Description	CenturyLink		Frontier Commonwealth		Verizon North		Verizon PA		Windstream	
	#	%	#	%	#	%	#	%	#	%
Broadband (3012-Def. of Broadband)	1	<1%	5	1%	2	1%	7	1%	4	1%
Network Modernization Plans (3014)	6	2%	12	3%	2	1%	11	1%	4	1%
Complaint Procedures (63.1, 63.15 and 63.59)	54	19%	63	16%	29	21%	191	16%	85	19%
Quality of Service (63.14, 63.23, 63.53 and 63.63)	8	3%	5	1%	8	6%	58	5%	38	9%
Service Records (63.22)	73	26%	110	29%	29	21%	242	21%	137	31%
Customer Trouble Reports (63.24 and 63.57)	113	40%	99	26%	55	40%	517	44%	152	34%
Installation of Service (63.58)	4	1%	1	<1%	1	1%	4	<1%	1	<1%
Migration (63.201-221)	1	<1%	2	1%	0	0%	5	<1%	0	0%
Billing and Payment (53.85, 64.1, 64.12-14, 64.16, 64.18-19, 64.24 and 64.53)	0	0%	25	6%	0	0%	8	1%	0	0%
Slamming and Cramming (64.23)	0	0%	2	1%	0	0%	8	1%	0	0%
Credit and Deposits (64.32-34 and 64.36)	0	0%	0	0%	0	0%	0	0%	0	0%
Suspension and Termination (64.61, 64.63, 64.71-74, 64.81, 64.101, 64.102, 64.121-123, 64.133 and 64.181)	1	<1%	4	1%	0	0%	9	1%	0	0%
Dispute Procedures (64.2 Def. of Dispute, 64.141, 64.142, 64.153 and 64.191)	5	2%	33	9%	5	4%	60	5%	4	1%
Other (63.21, 501(c) and 1501)	18	6%	24	6%	5	4%	44	4%	21	5%
<b>Total</b>	<b>284</b>		<b>385</b>		<b>136</b>		<b>1,164</b>		<b>446</b>	

\* # equals the number of verified infractions identified by BCS as of June 20, 2019.  
 % equals the percent of the total number of infractions for a particular company.

## Consumer Access to the Public Utility Commission

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

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

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

Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120

Information about the PUC is available on the Internet:

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



