

**PUBLIC SERVICE COMMISSION
OF MARYLAND**

UTILITY SERVICE PROTECTION PROGRAM

ANNUAL REPORT

WINTER 2023-2024

Submitted to the
Maryland General Assembly
Annapolis, Maryland

in compliance with §7-307 of
Public Utilities Article,
Annotated Code of Maryland

William Donald Schaefer Tower
6 Saint Paul Street
Baltimore, Maryland 21202
www.psc.state.md.us

TABLE OF CONTENTS

LIST OF TABLES	ii
LIST OF FIGURES	iii
EXECUTIVE SUMMARY	1
BACKGROUND OF THE USPP	8
DATA COLLECTION AND ANALYSIS	10
PROGRAM PARTICIPATION	12
SUPPLEMENTAL PAYMENTS AND SUPPLEMENTAL ARREARAGES.....	20
PARTICIPANT ARREARAGES AND PROGRAM COMPLIANCE	24
HEATING SEASON TERMINATIONS.....	31
HIGH ENERGY CONSUMPTION	32
PRIMARY HEAT SOURCE	34
MEAP GRANTS	36
CONCLUSION	38
APPENDIX A1: 2023-2024 HEATING SEASON REPORTING UTILITIES BASIC INFORMATION.....	39
APPENDIX A2: DATA REQUEST	40

LIST OF TABLES

TABLE E1: 2023-2024 USPP PARTICIPATION BY UTILITY COMPARED WITH MEAP AND TOTAL 4

TABLE E2: 2023-2024 USPP TERMINATION BY UTILITY 6

TABLE E3: USPP PARTICIPATION AND SERVICE TERMINATION 7

TABLE 1: NUMBER OF USPP CUSTOMERS AND ELIGIBLE NON-PARTICIPATING CUSTOMERS BY POVERTY LEVEL..... 14

TABLE 2: USPP PARTICIPATION AS A PERCENT OF TOTAL ELIGIBLE FOR EACH POVERTY LEVEL FOR EACH OF THE LAST TWO HEATING SEASONS 16

TABLE 3: USPP ENROLLMENT AS A PERCENTAGE OF MEAP AND TOTAL CUSTOMERS 17

TABLE 4: PERCENTAGE OF 2023-2024 USPP PARTICIPANTS WHO ALSO PARTICIPATED IN THE PROGRAM DURING THE PRIOR HEATING SEASON 18

TABLE 5: PERCENTAGE OF USPP CUSTOMERS MAKING SUPPLEMENTAL PAYMENTS, THE AVERAGE DOLLAR AMOUNT OF THOSE PAYMENTS, AND THE AVERAGE ARREARAGE REQUIRING PAYMENTS BY POVERTY LEVEL 22

TABLE 6: PERCENTAGE OF USPP PARTICIPANTS, MEAP-ELIGIBLE CUSTOMERS, AND NON-MEAP CUSTOMERS IN ARREARS BY POVERTY LEVEL 26

TABLE 7: AVERAGE ARREARAGE BALANCE FOR USPP PARTICIPANTS, MEAP-CERTIFIED NON-USPP PARTICIPANTS, AND NON-MEAP CUSTOMERS IN ARREARS BY POVERTY LEVEL 28

TABLE 8: PERCENTAGE OF USPP PARTICIPANTS WHO COMPLIED WITH PROGRAM PAYMENT PROVISIONS BY POVERTY LEVEL DURING THE LAST TWO HEATING SEASONS 30

TABLE 9: NUMBER OF WINTER HEATING SEASON TERMINATIONS 32

TABLE 10: PERCENTAGE OF USPP PARTICIPANTS WHO CONSUMED MORE THAN 135% OF SYSTEM AVERAGE ENERGY DURING THE MOST RECENT HEATING SEASON 33

TABLE 11: PERCENTAGE OF PARTICIPANTS, MEAP-CERTIFIED NON-USPP PARTICIPANTS, AND NON-MEAP CUSTOMERS WHOSE PRIMARY HEAT SOURCE IS PROVIDED BY THE UTILITY BY POVERTY LEVEL 35

TABLE 12: AVERAGE MARYLAND ENERGY ASSISTANCE PROGRAM GRANT FOR USPP PARTICIPANTS BY POVERTY LEVEL FOR THE LAST TWO HEATING SEASONS 37

LIST OF FIGURES

FIGURE 1: USPP PARTICIPANTS BY HEATING SEASON 2

FIGURE 2: USPP ENROLLMENT BY UTILITY FOR PAST THREE HEATING SEASONS..... 3

FIGURE 3: USPP TERMINATION RATE BY HEATING SEASON 5

FIGURE 4: USPP AVERAGE SUPPLEMENTAL ARREARAGE BY POVERTY LEVEL IN THREE CONSECUTIVE WINTER SEASONS 8

FIGURE 5: USPP PARTICIPATION COMPARISON BY POVERTY LEVEL FOR WHAT ARE THE NON-STATEWIDE CATEGORIES FOR THREE-CONSECUTIVE HEATING SEASONS 15

FIGURE 6: USPP CUSTOMERS REPEATED ENROLLMENT IN TWO CONSECUTIVE HEATING SEASONS BY UTILITY FOR THREE YEARS (2021–2024) 19

FIGURE 7: STATEWIDE RATE OF USPP CUSTOMERS ENROLLED IN TWO-CONSECUTIVE HEATING SEASONS SINCE 2011-2012 HEATING SEASON 20

FIGURE 8: AVERAGE MONTHLY SUPPLEMENTAL PAYMENT BY USPP PARTICIPANTS BY POVERTY LEVEL FOR 2021-2022, 2022-2023, AND 2023-2024 23

FIGURE 9: AVERAGE SUPPLEMENTAL ARREARAGE BALANCE BY POVERTY LEVEL FOR 2021–2024 24

FIGURE 10: AVERAGE USPP ARREARAGE BALANCE BY POVERTY LEVEL FOR THREE CONSECUTIVE HEATING SEASONS FOR CUSTOMERS MAKING EQUAL PAYMENTS 27

FIGURE 11: SERVICE TERMINATIONS BY POVERTY LEVEL FOR THE RECENT FOUR HEATING SEASONS 31

EXECUTIVE SUMMARY

The 2023-2024 winter heating season was the fourth heating season since the onset of the COVID-19 pandemic in 2020. The data showed continued signs of recovery from the circumstances associated with COVID-19, while also indicating structural changes in USPP participation independent of COVID-19. For example, while the number of USPP participants rebounded from the pandemic low to 2016-2017 levels, the past decade's steady decreasing trend in USPP participation appears to be reversing in response to inflation pressures borne by ratepayers. Compared with last season, terminations have increased statewide by only about 2.9 percent, but the average supplemental arrearage has increased for the first time, after having been decreasing for the three prior winter seasons.

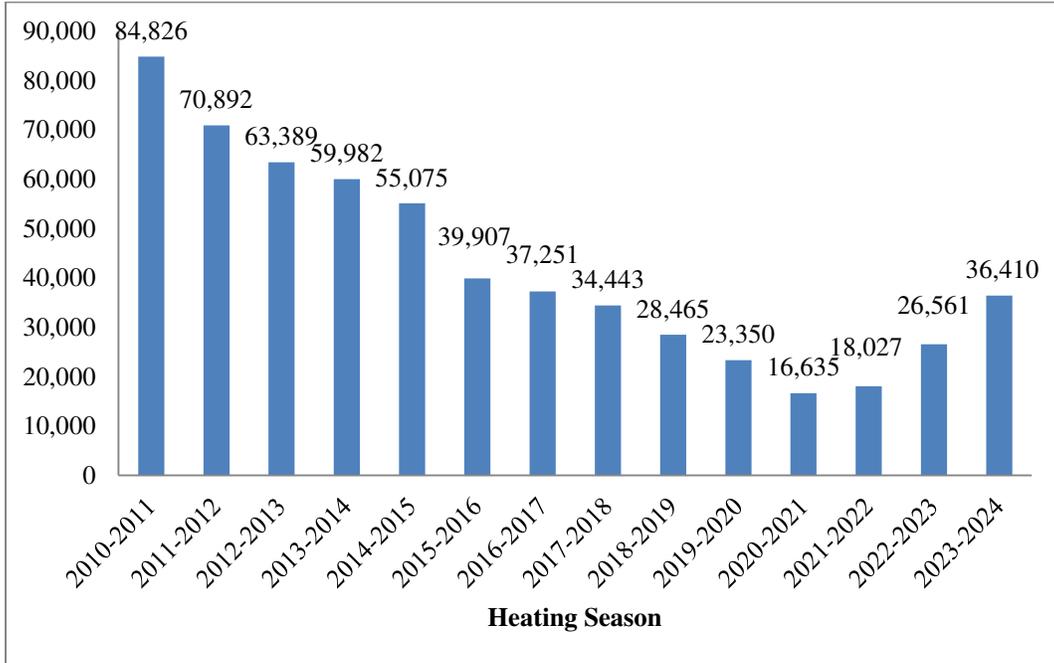
During the 2023-2024 winter heating season, 36,410 customers participated in the Utility Service Protection Program (USPP). Customer enrollment in the USPP increased by 9,849 or approximately 37 percent from the 26,561 USPP participants in the 2022-2023 heating season. The low USPP participation during the 2020-2021 and 2021-2022 heating seasons was the result of the Governor's Executive Order and the Commission's orders, which mandated that utilities not disconnect service even if customers did not pay their bills due to circumstances related to COVID-19.¹ Under the moratorium, some utilities established their own parallel policies to prevent service disconnections.² When comparing the three most recent heating seasons, the current 36,410 enrollments demonstrate a steady recovery in USPP participation. As seen in *Figure 1*, USPP participation has declined since 2010 by 48,416 enrollments, or 57 percent compared with the highest enrollment of 84,826 USPP participants during the winter of 2010.

¹ On March 16, 2020, Governor Larry Hogan issued an Executive Order prohibiting the termination of residential utility services and the imposition of late fees during the COVID-19 state of emergency. This prohibition was set to expire on August 1, 2020. On July 31, 2020, Governor Hogan extended the utilities' termination restrictions on residential customers to September 1, 2020.

The Commission initiated *PC53: Impacts of COVID-19 Pandemic on Maryland's Gas and Electric Utility Operations and Customer Experiences* and issued five orders in PC53, on August 31, 2020. The five motions prohibited the public utilities from terminating service to residential customers through November 15, 2020. The motions required a 45-day notice to customers prior to service disconnection.

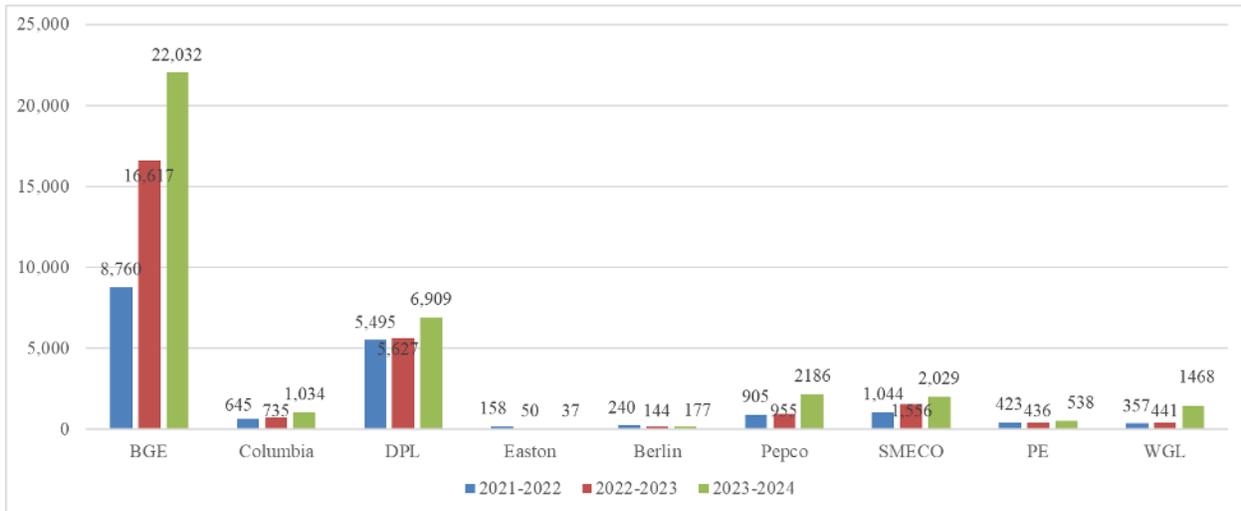
² Four subsidiaries of the Chesapeake Utilities Corporate ("CUC,") CUC-Cambridge Gas Division ("CUC-Cambridge,") CUC-Citizen Gas Division ("CUC-Citizen,") CUC-Sandpiper Energy ("CUC-Sandpiper,") and Elkton Gas ("Elkton") implemented a policy that there would be no terminations during the 2020-2021 heating season due to the COVID-19 pandemic.

Figure 1: USPP Participants by Heating Season



At the utility level, eight utilities reported an increase of 9,862 participants in 2023-2024, while one utility reported a decrease of 13 USPP participants from the previous heating season. Thus, the net increase in USPP participants was 9,849 from the previous season. *Figure 2* provides a three-year comparison of the USPP enrollment by utilities. The changes among the three heating seasons varied for each of the reporting utilities, but generally showed increases. BGE had the highest nominal participation for the third consecutive year with 22,032 USPP customers. BGE also showed the largest increase in participation, up 33 percent from 16,617 enrollments last season. Together, BGE and DPL accounted for 79 percent of the statewide total USPP participants.

Figure 2: USPP Enrollment by Utility for Past Three Heating Seasons



The USPP enrollment rate in the latest winter season represented 59 percent of the 61,353 customers statewide who were certified to receive benefits from the Maryland Energy Assistance Program (MEAP) during that period, approximately one percentage point lower than the 60 percent observed during the previous winter season. *Table E1* provides each utility’s USPP participants, MEAP-certified customers, and total customers, as well as each utility’s USPP enrollment as a percentage of MEAP, and total residential customers served. Of the utilities listed, BGE, at approximately 89 percent, had the highest USPP enrollment rate among its MEAP customers, followed by Berlin at 71 percent, and Delmarva Power and Light at 66 percent. The rest of the utilities had an enrollment rate below 50 percent. Using USPP enrollment as a percentage of total customers as a metric, a little less than half of the utilities (BGE, Columbia, Delmarva, Berlin, Pepco, SMECO, PE, and WGL) reported their USPP enrollment rate increased while the other half (Cambridge, Citizens, Sandpiper, Elkton, Hagerstown, Thurmont, and UGI) reported no change in their USPP enrollment rate from the previous heating season. Only Easton reported a decrease in enrollment.

Table E1: 2023-2024 USPP Participation by Utility Compared with MEAP and Total ³

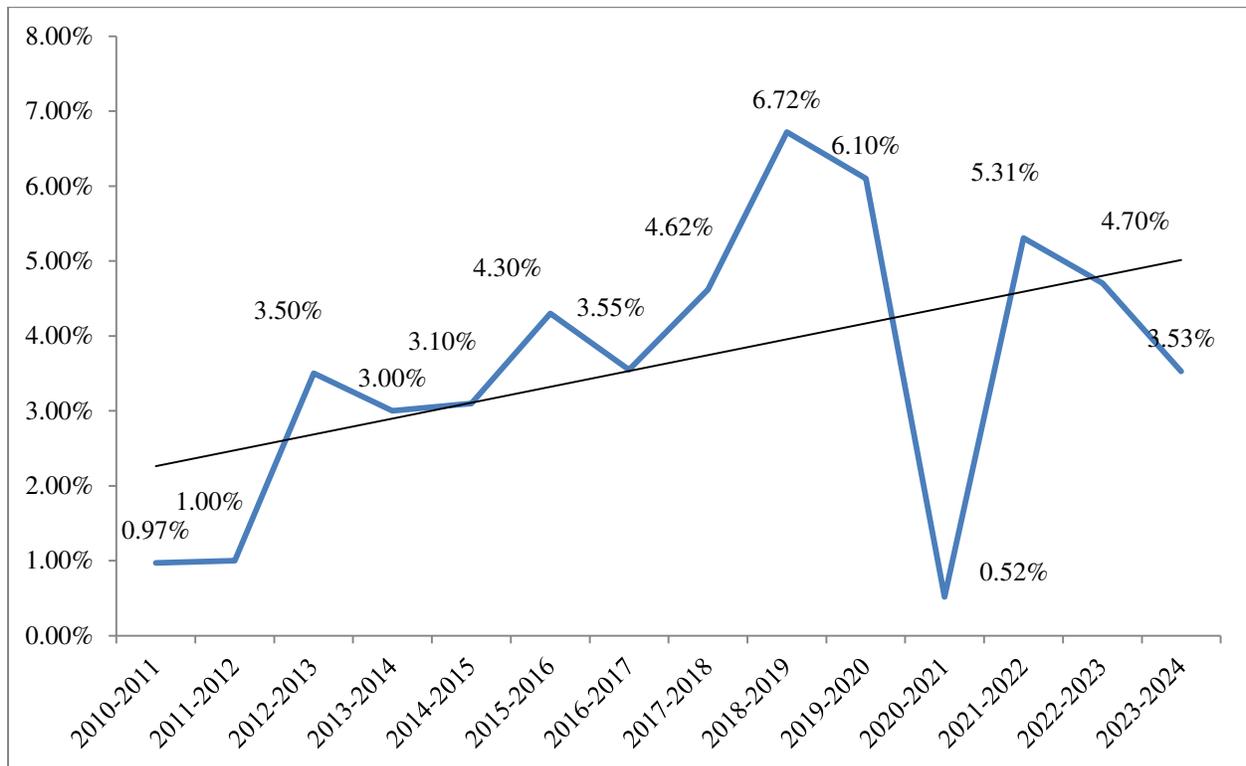
UTILITY	USPP	MEAP Customer	USPP Participants as a Percentage of MEAP Customer	Total Customers	USPP Participants as a Percentage of Total Customer
Baltimore Gas and Electric	22,032	24,751	89%	1,856,809	1.19%
Chesapeake Utilities - Cambridge Gas Division	-	314	0%	2,840	0.00%
Chesapeake Utilities - Citizens Gas Division	-	601	0%	9,414	0.00%
Chesapeake Utilities - Sandpiper Energy	-	74	0%	10,355	0.00%
Columbia Gas of Maryland	1,034	2,308	45%	30,661	3.37%
Delmarva Power & Light	6,909	10,454	66%	194,716	3.55%
Easton Utilities	37	567	7%	9,111	0.41%
Elkton Gas	-	352	0%	6,303	0.00%
Hagerstown	-	412	0%	15,117	0.00%
Mayor & Council of Berlin	177	249	71%	2,483	7.13%
Potomac Electric Power Company	2,186	7,272	30%	557,162	0.39%
Southern Maryland Electric Power Cooperative, Inc.	2,029	4,147	49%	155,148	1.31%
The Potomac Edison Company	538	2,981	18%	241,047	0.22%
Thurmont	-	27	0%	2,870	0.00%
UGI Utilities, Inc.	-	1	0%	472	0.00%
Washington Gas Light Company	1,468	6,843	21%	484,317	0.30%
Williamsport	N/A	N/A	N/A	N/A	N/A
Grand Total	36,410	61,353	59%	3,578,825	1.02%

As seen in the last column of *Table E1*, the statewide USPP participants accounted for approximately 1.02 percent of the total customer base that the USPP participating utilities serve, higher than the 0.75 percent in the previous 2022-2023 USPP report, and higher than the 0.68 percent observed in the 2020-2021 USPP report. The USPP enrollment rate for each utility as a percentage of total customers ranged from less than one percent to a high of 7.13 percent for Berlin.

³ Williamsport did not provide USPP data for this current heating season and, therefore, excluded from the data analysis.

The primary purpose of the USPP is to minimize service terminations of low-income customers during the cold winter season. *Table E2* provides the termination number and termination rate of USPP participants for each utility. The number of USPP participants' services terminated this last season was 1,285, a minimal increase of 36 from 1,249 of the previous year, which itself was a modest increase as compared with the year before. This season's statewide USPP termination rate was approximately 3.53 percent, compared to 4.70 percent in 2022-2023, and 5.31 percent in 2021-2022. The decrease in termination rate was driven largely by an increase in USPP participants, which increased by almost 10,000, while terminations increased by just 36.

Figure 3: USPP Termination Rate by Heating Season



The lowest customer terminations in the last decade, seen during the 2020-2021 heating season, reflected the impact of the COVID-19 pandemic and the implementation of the Commission's termination moratorium policy and motions in the Commission's PC53.⁴ The termination rate in

⁴ The Commission initiated *PC53: Impacts of COVID-19 Pandemic on Maryland's Gas and Electric Utility Operations and Customer Experiences* and issued five motions in the PC53, August 31, 2020. The Commission's

this report showed a decrease from a peak in 2018-2019 but is comparable to earlier seasons between 2014 and 2018. If the trendline holds, termination rates may nevertheless see increases during future heating seasons.

Table E2: 2023-2024 USPP Termination by Utility

UTILITY	USPP Participants	Termination	Termination Rate	Terminations from Previous Heating Season
Baltimore Gas and Electric	22,032	1,111	5.0%	1,243
Chesapeake Utilities - Cambridge Gas Division	-	-	0.0%	-
Chesapeake Utilities - Citizens Gas Division	-	-	0.0%	-
Chesapeake Utilities - Sandpiper Energy	-	-	0.0%	-
Columbia Gas of Maryland	1,034	-	0.0%	-
Delmarva Power & Light	6,909	139	2.0%	4
Easton Utilities	37	1	2.7%	-
Elkton Gas	-	-	0.0%	-
Hagerstown	-	-	0.0%	-
Mayor & Council of Berlin	177	-	0.0%	-
Potomac Electric Power Company	2,186	30	1.4%	2
Southern Maryland Electric Power Cooperative, Inc.	2,029	-	0.0%	-
The Potomac Edison Company	538	4	0.7%	-
Thurmont	-	-	N/A	-
UGI Utilities, Inc.	-	-	0.0%	-
Washington Gas Light Company	1,468	-	0.0%	-
Williamsport	-	-	N/A	-
Statewide Total	36,410	1,285	3.5%	1,249

Table E2 reports the terminations for each of the utilities during the 2023-2024 heating season. Of the total 1,249 terminations, only five utilities terminated customers. BGE terminated the lion's share at 1,111 accounts, while Delmarva terminated 139 customers and Pepco terminated

orders directed a moratorium on terminations until November 15, 2020, and the Commission required that the utilities send a termination notice 45 days in advance to customers as of October 1, 2020. These actions included but were not limited to USPP customers.

30. BGE serves the largest number of residential customers in the state and its terminations accounted for the largest total amount, at 86 percent of all terminations across the state. This is a decrease from last year, where BGE accounted for 99 percent of all statewide terminations. As in the previous heating seasons, some utilities observed no-termination policies. Primary among those observing no-termination policies were the municipal utilities, which work with their customers to avoid termination.

Table E3 summarizes the number of USPP participants shown in *Figure 1* and summarizes USPP terminations shown in *Figure 3* for 13 winter seasons from 2010-2011 to 2023-2024. The number of USPP participants trends downward, while the number of USPP terminations fluctuates but trends upward during the same period. The lowest termination rate, 0.52 percent of the 2020-2021 termination rate is an outlier due to the COVID-19 pandemic. Put together, the uptrend termination rate is correlated with the decline in USPP participation.

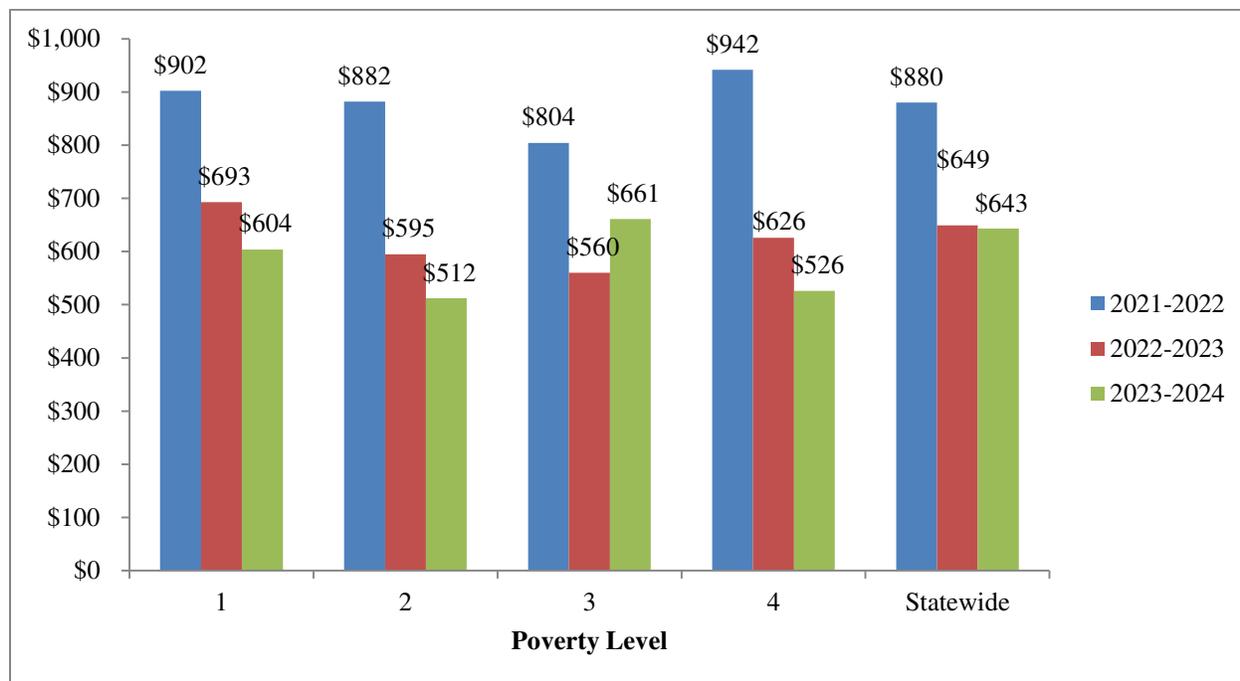
Table E3: USPP Participation and Service Termination

Reporting Season	USPP Participants	USPP Service Termination	Percentage of USPP Termination
2010-2011	84,826	819	0.97%
2011-2012	70,892	708	1.00%
2012-2013	63,389	2,208	3.50%
2013-2014	59,982	1,788	3.00%
2014-2015	55,075	1,721	3.10%
2015-2016	39,907	1,718	4.30%
2016-2017	37,251	1,323	3.55%
2017-2018	34,443	1,592	4.62%
2018-2019	28,465	1,913	6.72%
2019-2020	23,647	1,442	6.10%
2020-2021	16,635	86	0.52%
2021-2022	18,072	959	5.31%
2022-2023	26,561	1,249	4.70%
2023-2024	36,410	1,285	3.53%

Another key metric is the statewide average supplemental arrearage by poverty level. The arrearage skyrocketed during the 2020-2021 winter season and has been decreasing since. During the 2020-2021 heating season, the statewide average supplemental arrearage was \$1,254, which was a radical departure from the \$373 average supplemental arrearage in the pre-

pandemic 2019-2020 winter heating season. At the poverty level of analysis, the average supplemental arrearage at each poverty level decreased for the past three consecutive winter seasons, with the exception of level 3 which increased over the last year.⁵ *Figure 4* illustrates the average supplemental arrearage in the three consecutive heating seasons by poverty level.

Figure 4: USPP Average Supplemental Arrearage by Poverty Level in Three Consecutive Winter Seasons



Therefore, the data shows recovery from the unprecedented effects of the pandemic, while also demonstrating an upward trend in terminations explained by the decreasing participation levels in the USPP. As a result, average supplemental arrearage is also higher than pre-pandemic averages, though less acute than what was experienced during the peak in 2020 and 2021.

BACKGROUND OF THE USPP

On March 1, 1988, the Maryland Public Service Commission issued Order No. 67999 in Case No. 8091,⁶ which established the Utility Service Protection Program, as required by Article 78

⁵ The poverty level definitions can be found in Staff’s Data Request to the Utilities, attached to this report at Appendix A2 (p.40).

⁶ *In the Matter of Regulations Governing Terminations of Gas or Electric Service to Low Income Residential Customers During the Heating Season.*

§54K. This has since been recodified as §7-307 of the Public Utilities Article (PUA), *Annotated Code of Maryland*. PUA §7-307 directs the Commission to promulgate regulations relating to when, and under what conditions there should be a prohibition against or a limitation upon the authority of a public service company to terminate, for nonpayment, gas or electric service to low-income residential customers during the winter heating season. Regulations governing the USPP are contained in the Code of Maryland Regulations (COMAR) 20.31.05.

The USPP is available to utility customers who are eligible and have applied for a grant from the Maryland Energy Assistance Program (MEAP), which is administered by the Office of Home Energy Programs (OHEP), a division of the Maryland Department of Human Services. The USPP is designed to protect eligible low-income residential customers from utility service termination during the winter heating season, which extends from November 1 through March 31. The USPP is intended to help low-income customers avoid the accumulation of arrearages, which could lead to service terminations, by requiring timely equal monthly utility payments for participants, also known as “budget billing plans,” based on the estimated cost of annual service to participating households. The USPP allows customers in arrears to restore service by accepting an equal payment plan and by requiring that any outstanding arrearages be lowered to no more than \$400 prior to the beginning of the winter heating season. The USPP encourages the utility to establish a supplemental monthly payment plan for customers with outstanding balances to reduce those arrearages. Maryland’s gas and electric utilities are required to publicize and offer the USPP prior to November of each year. For more information, see COMAR 20.31.05.03C.

PUA §7-307 requires the Commission to submit an annual report to the General Assembly addressing terminations of service during the previous winter heating season. To facilitate the compilation of this report, the Commission directs all gas and electric utilities to collect specific data under COMAR 20.31.05.09. Through a data request issued by Commission Staff, the utilities are asked to report the following: (1) the number of USPP participants, USPP eligible non-participants among MEAP certified customers, total utility customers, and current USPP participants who also participated in the previous year; (2) the number of customers for whom the utility’s service is the primary heating source; (3) the number of customers making

supplemental payments, average supplemental payment amounts, and the amount of arrearage leading to those payments; (4) the number of USPP participating and eligible non-participating customers in arrears, the amount of the arrearage, and the amount of the average monthly payment obligations; (5) the average MEAP grant amount; (6) the number of customers dropped from the USPP for non-payment of bills; (7) the number of service terminations for USPP participants; (8) the number of USPP customers consuming more than 135 percent of the system average for the heating season; and (9) the average cost of actual usage for the heating season.⁷ Utilities serving residential customers in Maryland submitted data for this report. The Commission's April 2024 data request for the 2023-2024 heating season was similar to previous USPP data requests.⁸ This report provides an analysis and summary of that information.

DATA COLLECTION AND ANALYSIS

Sixteen companies submitted 2023-2024 heating season USPP reports to the Commission.⁹ Among these companies, three companies did not participate in the USPP: Hagerstown does not participate in the USPP program but implements a Commission-approved alternate program;¹⁰ one small municipal company—Thurmont—did not participate; and one other small municipal company—Williamsport—did not respond to the data request and is not included in this report. The analysis contained in this report includes 16 companies that provided USPP poverty level data. However, the four subsidiaries of Chesapeake Utilities Corporation—Cambridge, Citizen, Sandpiper, and Elkton—did not have USPP enrollments. Neither did UGI Utilities. The data provided to the Commission by the nine remaining companies have variations. For example, some utilities indicated that available data was not differentiated by poverty level or was unavailable for various other reasons. The basic information for all responding utilities is

⁷ The data request was issued to BGE, CUC-Cambridge, CUC-Citizens, CUC-Sandpiper, Columbia Gas, Delmarva, Easton, Elkton, WGL, Hagerstown Municipal Electric Light Plant, Berlin, Pepco, SMECO, Potomac Edison, Thurmont Municipal Light Company, UGI Utilities, Inc., Washington Gas and Light, and Williamsport Municipal Light Plant.

⁸ The USPP Data Request was expanded in 2007 and several small changes were made in 2018 in the interests of clarity.

⁹ Choptank is no longer subject to COMAR 20.31.05.09 and does not provide data responses since the 2020-2021 heating season.

¹⁰ Pursuant to COMAR 20.31.05.01C, Hagerstown operates an approved alternative program that allows MEAP-eligible customers to receive USPP-type assistance as needed during the heating season. As such, Hagerstown does not distinguish between USPP participants and all MEAP-eligible customers and does not maintain records indicating the number of individual customers who received assistance beyond that provided under MEAP.

contained in Appendix A1, which indicates that utilities should provide all data in the Commission Data Request if they serve more than 5,000 customers or a limited set of data if they serve 5,000 or fewer customers.

The data in this report provides information on Poverty Levels 1, 2, 3, 4, and 5 (PL1, PL2, PL3, PL4, PL5) as applicable. Customers are grouped by household incomes measured against the federal poverty level (FPL) guidelines as follows:

Poverty Level Classification

Poverty Level	Household Income
Poverty Level 1	0%-75% of the FPL
Poverty Level 2	>75%-110% of the FPL
Poverty Level 3	>110%-150% of the FPL
Poverty Level 4	>150%-175% of the FPL
Poverty Level 5	Subsidized Housing

Each USPP customer’s poverty level is determined by the Office of Home Energy Programs after OHEP receives the customer’s MEAP application. OHEP provides the list of customer poverty level to each utility which serves the approved MEAP customers.

A special note regarding the treatment of Poverty Level 5 in this report is required. Poverty Level 5 data previously was reported only by Baltimore Gas and Electric Company; however, since the 2015-2016 reporting season, DPL and Pepco also have provided data for Poverty Level 5.¹¹ Poverty Level 5 data is comprised of participants that receive subsidized housing allowances. In the 2021-2022 data responses, almost all utilities had poverty level 5 customers, even though some utilities did not provide data for this poverty level. Because residents of subsidized housing may receive an allowance to defray the cost of utilities, these participants receive a separate and lower MEAP benefit than do other USPP participants.¹²

The report presents an analysis of the USPP data provided by the utilities in the order of the tables. In the previous USPP reports, the analysis focused on the changes by utilities and poverty levels between the current winter reporting season and the previous heating season. In this report,

¹¹ DPL and Pepco started reporting Poverty Level 5 as BGE did after those companies merged with Exelon Corporation.

¹² Energy assistance is available to residents of subsidized housing who are directly responsible for paying their own heating costs and who meet all other eligibility criteria for the MEAP.

the analysis focuses on the data from 2023-2024 and provides a comparison for the three previous consecutive heating seasons: (1) the 2020-2021 heating season, which was the COVID-19 pandemic peak season; (2) the 2021-2022 heating season, which was the “recovery” heating season but still in the pandemic, and (3) the 2022-2023 heating season, which was after the main pandemic. The report also includes some trend analyses.

PROGRAM PARTICIPATION

Table 1 shows the number of USPP participants and USPP eligible non-participants for each utility by poverty level in the 2023-2024 heating season.¹³ The number of USPP participants was 36,410, with MEAP-certified, non-USPP participants of 24,943, resulting in a total number of MEAP-certified customers of 61,353. Compared with the previous 2022-2023 heating season, USPP participants increased by 9,859, or approximately 37 percent; the non-USPP MEAP customers increased by 7,309 or 41 percent; and the total number of MEAP-certified customers increased by 17,168, or 39 percent.¹⁴ The previous year’s figures all showed an increase from the prior 2021-2022 heating season, with a change in customers of 8,524, -4,067, and 4,457 for USPP, non-USPP/MEAP, and total MEAP customers respectively. When compared to the COVID 2020-2021 heating season, the current heating season had 35,018 more USPP participants—indicating a return to pre-pandemic enrollment figures.

Experience varied by utility during the 2023-2024 heating season. Of the reporting utilities, eight utilities—BGE, Columbia, DPL, Berlin, Pepco, SMECO, PE, and WGL—reported USPP enrollment increases and one utility—Easton—reported a decrease in the USPP participants in the current heating season as compared with the previous heating season. As for the distribution of statewide USPP participants, BGE reported 22,032 USPP participants, accounting for 61 percent of the State’s total USPP participants. DPL, Pepco, and SMECO followed in top participation at 6,909 (or 19 percent), 2,186 (or 6 percent), and 2,029 (or 5.6 percent)

¹³ The USPP participants are a subset of MEAP certified customers. Another subset of MEAP certified customers are non-USPP participants. The terms “USPP eligible non-Participant,” “MEAP eligible non-USPP Participant,” and “MEAP certified non-USPP customer” are used interchangeably in this report. These persons represent the customers who are eligible to receive a MEAP grant and are, therefore, eligible to enroll in USPP but who do not participate in the USPP program.

¹⁴ Since 2020-2021 heating season, Choptank Cooperative has not reported its USPP data to the Commission, and the USPP report no longer includes Choptank data.

respectively. The remaining utilities made up less than nine percent of Maryland's total USPP enrollments.

Table 1: Number of USPP Customers and Eligible Non-participating Customers by Poverty Level

UTILITY	USPP Participants						% of USPP Total	USPP Eligible Non-Participants						USPP + MEAP Total
	Poverty Level							Poverty Level						
	1	2	3	4	5	Overall		1	2	3	4	5	Overall	
Baltimore Gas and Electric	5,633	3,728	3,597	1,968	7,106	22,032	61%	553	100	111	1689	266	2,719	24,751
Chesapeake Utilities - Cambridge Gas	0	0	0	0	0	0	0%	24	280	8	1	1	314	314
Chesapeake Utilities - Citizens Gas	0	0	0	0	0	0	0%	76	513	7	3	2	601	601
Chesapeake Utilities - Sandpiper Energy	0	0	0	0	0	0	0%	15	36	18	5	0	74	74
Columbia Gas of Maryland	240	367	305	101	21	1,034	3%	250	467	419	138	0	1,274	2,308
Delmarva Power & Light	2,098	2,123	1,667	869	152	6,909	19%	756	1120	918	451	300	3,545	10,454
Easton Utilities	4	18	9	5	1	37	0%	105	202	162	52	9	530	567
Elkton Gas	0	0	0	0	0	0	0%	34	297	18	3	0	352	352
Hagerstown	0	0	0	0	0	0	N/A	73	174	121	33	11	412	N/A
Mayor & Council of Berlin	49	76	52	0		177	0%	18	37	17	0		72	249
Potomac Electric Power Company	677	624	467	256	162	2,186	6%	1441	1403	1014	559	669	5,086	7,272
Southern Maryland Electric Power Coop., Inc.	578	681	492	278	0	2,029	6%	469	792	572	285	0	2,118	4,147
The Potomac Edison Company	158	169	135	76	0	538	1%	607	724	606	506	0	2,443	2,981
Thurmont	0	0	0	0	0	0	0%	27	0	0	0	0	27	27
UGI Utilities	0	0	0	0	0	0	0%	1	0	0	0	0	1	1
Washington Gas Light Company	355	527	379	171	36	1,468	4%	1,404	1709	1430	679	153	5,375	6,843
Williamsport	0	0	0	0	0	0	0%	0	0	0	0	0	-	0
TOTALS	9,792	8,313	7,103	3,724	7,478	36,410	100%	5,853	7,854	5,421	4,404	1,411	24,943	61,353

Looking across all utilities, *Figure 5* illustrates USPP participation by poverty level for the most recent three heating seasons. Note that the lower the poverty level, the greater the percentage of USPP enrollment.

Figure 5: USPP Participation Comparison by Poverty Level for what are the non-statewide categories for Three-Consecutive Heating Seasons

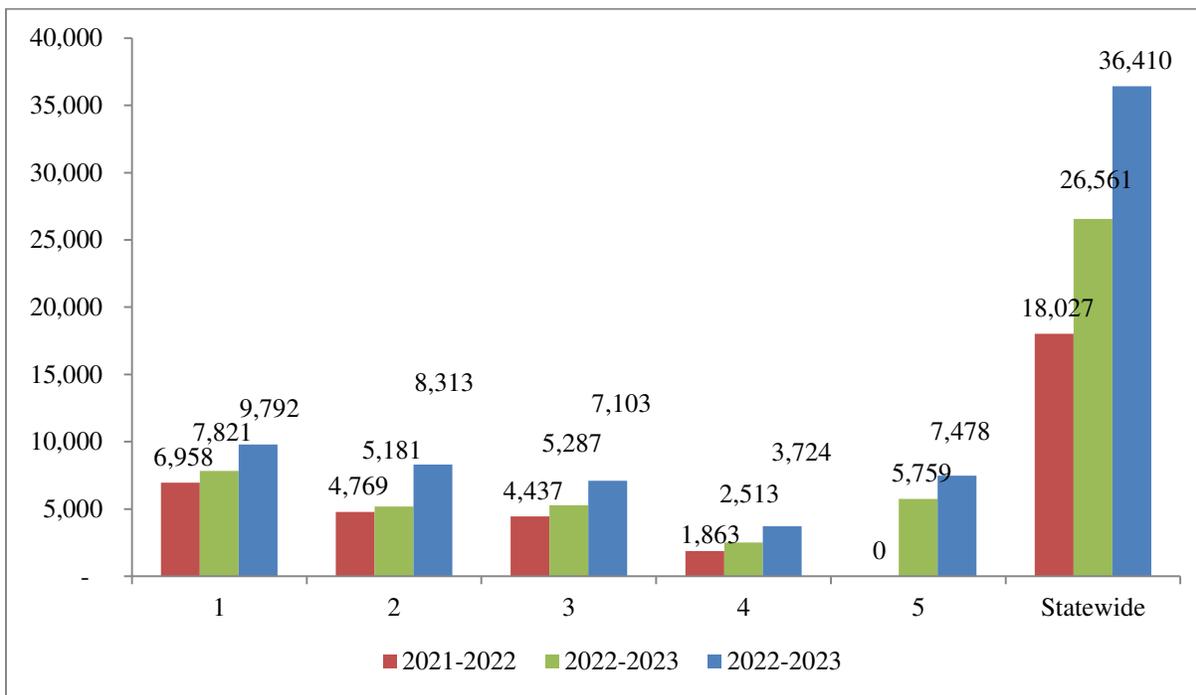


Table 2 presents USPP participation as a percentage of the total number of MEAP-certified customers for the 2022-2023 and 2023-2024 heating seasons by company and by poverty level. The statewide USPP participation rate of MEAP-certified customers for the 2023-2024 heating season was 59 percent, comparable to the past few seasons where the USPP participation rate was 60 percent, 45 percent, 49 percent, and 64 percent for the 2022-2023, 2021-2022, 2020-2021, and 2019-2020 heating seasons, respectively. This measure is normally an indicator of MEAP-certified customers who need energy assistance and need USPP protection to spread unpaid balances over the winter season to avoid service termination.

BGE reported the highest enrollment rates of MEAP customers in USPP at more than 89 percent across all poverty levels. This was followed by Berlin at 71 percent and Delmarva at 66 percent. All enrollments have remained similar to their 2022-2023 season levels.

Table 2: USPP Participation as a percent of Total Eligible for each Poverty Level for each of the last Two Heating Seasons ¹⁵

UTILITY	2023-2024 Participation						2022-2023 Participation					
	Poverty Level						Poverty Level					
	1	2	3	4	5	Overall 1	1	2	3	4	5	Overall 1
Baltimore Gas and Electric	91%	97%	97%	54%	96%	89%	95%	94%	95%	93%	97%	95%
Chesapeake Utilities - Cambridge Gas	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Chesapeake Utilities - Citizens Gas Division	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Chesapeake Utilities - Sandpiper Energy	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Columbia Gas of Maryland, Inc.	49%	44%	42%	42%	100%	45%	50%	47%	43%	49%	100%	48%
Delmarva Power & Light	74%	65%	64%	66%	34%	66%	77%	73%	73%	73%	46%	74%
Easton Utilities	4%	8%	5%	9%	10%	7%	8%	10%	9%	16%	0%	10%
Elkton Gas	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Hagerstown	0%	0%	0%	0%	0%	0%	N/A	N/A	N/A	N/A	N/A	N/A
Mayor & Council of Berlin	73%	67%	75%	0%	0%	71%	83%	84%	87%	0%	0%	84%
Potomac Electric Power Company	32%	31%	32%	31%	19%	30%	17%	16%	19%	16%	14%	17%
Southern Maryland Electric Cooperative, Inc.	55%	46%	46%	49%	0%	49%	43%	43%	43%	44%	0%	43%
The Potomac Edison Company	21%	19%	18%	13%	0%	18%	23%	20%	22%	21%	0%	21%
Thurmont	0%	0%	0%	0%	0%	0%	N/A	N/A	N/A	N/A	N/A	N/A
UGI Utilities, Inc.	0%	0%	0%	0%	0%	0%	N/A	N/A	N/A	N/A	N/A	N/A
Washington Gas Light Company	20%	24%	21%	20%	19%	21%	14%	11%	14%	12%	20%	13%
Williamsport	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Statewide	63%	51%	57%	46%	84%	59%	58%	48%	58%	58%	89%	60%

¹⁵ N/A indicates that a company did not participate in USPP. 0% indicates that the company reported 0% enrollment for USPP data so the calculation for this table resulted in 0% participation.

Table 3 presents the USPP enrollment compared to the USPP-eligible MEAP customers and the total residential customers each utility serves. During the 2023-2024 heating season, the rate of USPP participants compared to total utility customers statewide was up to 1.02 percent from the previous 0.75 percent in the 2022-2023 heating season, 0.52 percent in the 2021-2022, and 0.48 percent in the 2020-2021 report.

Table 3: USPP Enrollment as a Percentage of MEAP and Total Customers¹⁶

UTILITY	USPP	MEAP Customer	USPP Participants as a Percentage of MEAP Customer	Total Customers	USPP Participants as a Percentage of Total Customer
Baltimore Gas and Electric	22,032	24,751	89%	1,856,809	1.19%
Chesapeake Utilities - Cambridge Gas Division	-	314	0%	2,840	0.00%
Chesapeake Utilities - Citizens Gas Division	-	601	0%	9,414	0.00%
Chesapeake Utilities - Sandpiper Energy	-	74	0%	10,355	0.00%
Columbia Gas of Maryland	1,034	2,308	45%	30,661	3.37%
Delmarva Power & Light	6,909	10,454	66%	194,716	3.55%
Easton Utilities	37	567	7%	9,111	0.41%
Elkton Gas	-	352	0%	6,303	0.00%
Hagerstown	-	412	0%	15,117	0.00%
Mayor & Council of Berlin	177	249	71%	2,483	7.13%
Potomac Electric Power Company	2,186	7,272	30%	557,162	0.39%
Southern Maryland Electric Power Cooperative, Inc.	2,029	4,147	49%	155,148	1.31%
The Potomac Edison Company	538	2,981	18%	241,047	0.22%
Thurmont	-	27	0%	2,870	0.00%
UGI Utilities, Inc.	-	1	0%	472	0.00%
Washington Gas Light Company	1,468	6,843	21%	484,317	0.30%
Williamsport	N/A	N/A	N/A	N/A	N/A
Grand Total	36,410	61,353	59%	3,578,825	1.02%

At the utility level, DPL reported 3.55 percent USPP participation rate (the highest USPP participation rate among major utilities) of its total residential customers, followed by Columbia

¹⁶ N/A indicates that a company did not participate in USPP. 0% indicates that the company reported 0% enrollment for USPP data so the calculation for this table resulted in 0% participation.

at 3.37 percent, SMECO at 1.31 percent, and BGE at 1.19 percent. Of the municipal utilities, Berlin stands out at 7.13 percent of total customers enrolled in USPP. The remaining utilities each had a participation rate below one percent.

Table 4 shows the percentage of customers who were USPP participants in the 2023-2024 heating season and also participated in the 2022-2023 heating season. Overall, approximately 34 percent of the USPP customers who participated this year also enrolled last year.

Table 4: Percentage of 2023-2024 USPP Participants who also participated in the Program during the prior Heating Season ¹⁷

UTILITY	Poverty Level					Overall
	1	2	3	4	5	
Baltimore Gas and Electric	23%	32%	30%	19%	40%	31%
Chesapeake Utilities - Cambridge Gas	0%	0%	0%	0%	0%	0%
Chesapeake Utilities - Citizens Gas Division	0%	0%	0%	0%	0%	0%
Chesapeake Utilities - Sandpiper Energy	0%	0%	0%	0%	0%	0%
Columbia Gas of Maryland, Inc.	0%	0%	0%	0%	0%	0%
Delmarva Power & Light	54%	64%	59%	44%	35%	56%
Easton Utilities	0%	0%	0%	0%	0%	0%
Elkton Gas	0%	0%	0%	0%	0%	0%
Hagerstown	0%	0%	0%	0%	0%	0%
Mayor & Council of Berlin	0%	0%	0%	0%	0%	0%
Potomac Electric Power Company	43%	55%	51%	30%	33%	46%
Southern Maryland Electric Cooperative, Inc.	30%	21%	28%	18%	0%	25%
The Potomac Edison Company	28%	27%	30%	22%	0%	28%
Thurmont	0%	0%	0%	0%	0%	0%
UGI Utilities	0%	0%	0%	0%	0%	0%
Washington Gas Light Company	11%	14%	13%	8%	0%	12%
Williamsport	0%	0%	0%	0%	0%	0%
TOTALS	30%	38%	35%	25%	40%	34%

This statewide enrollment rate of 34 percent is higher than the previous season (2022-2023) at 28 percent, equal to the season before that (2021-2022) at 34 percent, and lower than the season before that (2020-2021) at 45 percent. It is also lower than pre-pandemic levels of around 36 and 35 percent repeat enrollment for 2018-2019 and 2019-2020 respectively.

¹⁷ N/A indicates that a company did not participate in USPP. 0% indicates that the company reported 0% enrollment for USPP data so the calculation for this table resulted in 0% participation.

Figure 6 shows the three years of repeat enrollments by the utilities. All utilities with data show an increasing trend for repeat enrollment, with Pepco showing the most drastic increase from around 14 percent back to 46 percent in just two seasons. Pepco’s repeat enrollment prior to 2021 was around 40 percent.

Figure 6: USPP Customers Repeated Enrollment in Two Consecutive Heating Seasons by Utility for Three Years (2021–2024)

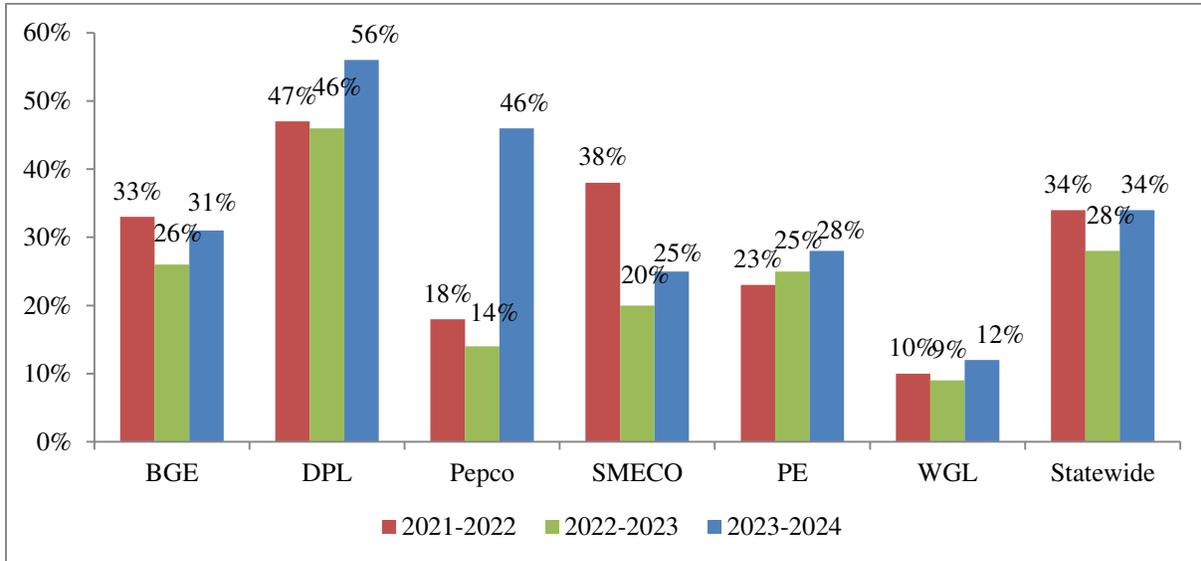
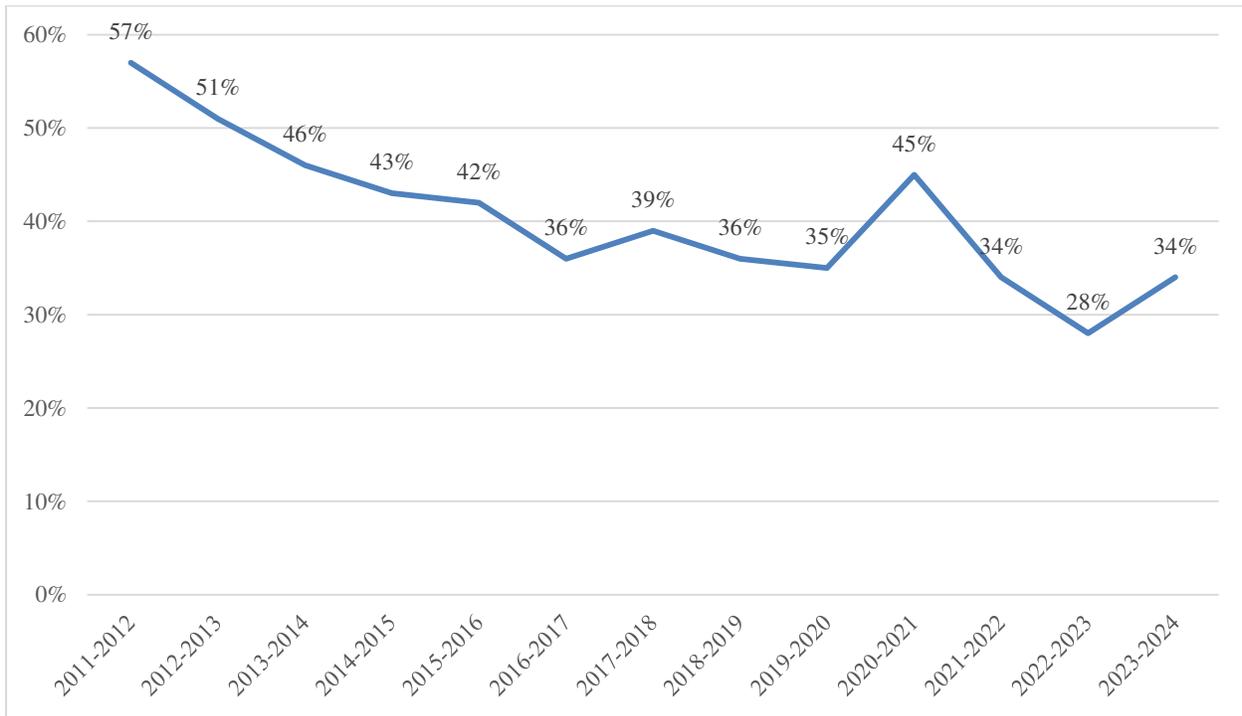


Figure 7 illustrates a trend line for the repeat participation rates from 2011 to the instant heating season. Repeat participation has been steadily decreasing, with the exception of the pandemic year in 2020 where repeat USPP enrollments increased slightly.

Figure 7: Statewide Rate of USPP Customers Enrolled in Two-Consecutive Heating Seasons Since 2011-2012 Heating Season



SUPPLEMENTAL PAYMENTS AND SUPPLEMENTAL ARREARAGES

Table 5 shows the percentage of USPP participants making supplemental payments (also known as alternate payments), the average monthly amount of those payments, and the average “supplemental arrearage” that led to those payments. The USPP encourages the utilities to offer customers with outstanding arrearages the opportunity to place all or part of those arrearages in a special agreement to be paid off over an extended period. Although the deferred payment arrangements vary, all utilities provide for enrollment in supplemental payment plans. For example, BGE requires that all USPP participants enroll in a Budget Billing Plan. Columbia Gas allows USPP customers to make 12-, 24-, and 36- months’ equal monthly payments of existing arrearages according to their USPP customers’ incomes. Placing outstanding arrearages in special agreements allows customers to enroll in USPP and be considered current in their utility payments as long as they continue to make their USPP equal monthly payments and their supplemental payments in a timely fashion. During the previous heating season, the Commission required the utilities to enter into payment arrangements on customers’ unpaid bills for a

minimum payment plan period of 12 months, or 24 months for those customers receiving energy assistance from OHEP.¹⁸

The number of customers who were participants in USPP and made supplemental payments in the 2023-2024 heating season was 4,128, compared to 2,236 in 2022-2023, 1,486 in 2021-2022, 3,139 in 2020-2021 and 1,769 in 2019-2020. The percentage of USPP participants making supplemental payments was approximately 11 percent of total USPP participants, which was an increase from eight percent in 2022-2023, eight percent in 2021-2022, and equivalent to the 11 percent required in 2020-2021.

¹⁸ The Commission initiated *PC53: Impacts of COVID-19 Pandemic on Maryland's Gas and Electric Utility Operations and Customer Experiences* and issued five motions in the PC53, August 31, 2020.

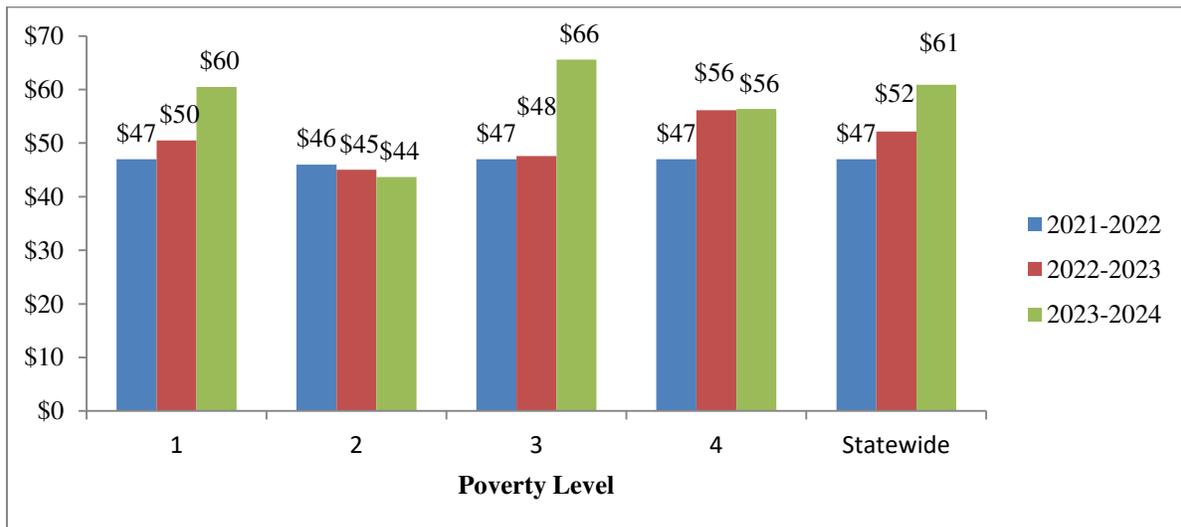
Table 5: Percentage of USPP Customers making Supplemental Payments, the Average Dollar Amount of those Payments, and the Average Arrearage Requiring Payments by Poverty Level ¹⁹

Utility	Percentage of USPP Customers Making Supplemental Payments						Average Monthly Amount of Supplemental Payments (\$)						Average Supplemental Arrearage (\$)					
	Poverty Level						Poverty Level						Poverty Level					
	1	2	3	4	5	Overall	1	2	3	4	5	Overall	1	2	3	4	5	Overall
Baltimore Gas & Electric	7%	6%	7%	9%	8%	8%	78.00	69.00	74.00	90.00	73.00	76.80	852.00	781.00	839.00	1019.00	830.00	864.20
Chesapeake Utilities - Cambridge Gas	0%	0%	0%	0%	0%	0%	0	0	0	0	0	-	0	0	0	0	0	-
Chesapeake Utilities - Citizens Gas Division	0%	0%	0%	0%	0%	0%	0	0	0	0	0	-	0	0	0	0	0	-
Chesapeake Utilities - Sandpiper Energy	0%	0%	0%	0%	0%	0%	0	0	0	0	0	-	0	0	0	0	0	-
Columbia Gas of Maryland, Inc.	23%	17%	8%	6%	19%	15%	17.47	21.85	49.66	51.00	121.75	52.35	456.95	353.89	368.91	301.43	1000.76	496.39
Delmarva Power & Light	20%	15%	17%	27%	42%	19%	105.00	115.00	103.00	104.00	75.00	100.40	1381.00	1417.00	1285.00	1370.00	1358.00	1,362.20
Easton Utilities	0%	6%	0%	0%	0%	3%	0	0	0	0	0	-	0	0	0	0	0	-
Elkton Gas	0%	0%	0%	0%	0%	0%	0	0	0	0	0	-	0	0	0	0	0	-
Hagerstown	0%	0%	0%	0%	0%	0%	0	0	0	0	0	-	0	0	0	0	0	-
Mayor & Council of Berlin	0%	0%	0%	0%	0%	0%	0	0	0	0	0	-	0	0	0	0	0	-
Potomac Electric Power Company	20%	14%	23%	28%	34%	21%	94.00	79.00	91.00	105.00	113.00	96.40	1155.00	1390.00	1259.00	1366.00	1582.00	1,350.40
Southern Maryland Electric Cooperative	28%	23%	21%	23%	0%	24%	93.23	72.28	74.51	61.55	0.00	75.39	828.44	578.57	665.41	407.87	#DIV/0!	620.07
The Potomac Edison Company	8%	3%	5%	7%	0%	5%	148.00	36.00	196.00	97.00	0.00	119.25	602.00	62.00	1477.00	182.00	#DIV/0!	580.75
Thurmont	0%	0%	0%	0%	0%	0%	0	0	0	0	0	-	0	0	0	0	0	-
UGI Utilities	0%	0%	0%	0%	0%	0%	0	0	0	0	0	-	0	0	0	0	0	-
Washington Gas Light Company	2%	2%	1%	2%	3%	2%	69.18	43.81	67.57	55.29	94.85	66.14	762.7	534.38	718.68	617.31	1145.05	755.62
Williamsport	0%	0%	0%	0%	0%	0%	0	0	0	0	0	-	0	0	0	0	0	-
TOTALS	12%	11%	11%	15%	9%	11%	60.49	43.69	65.57	56.38	95.52	60.87	603.81	511.68	661.30	526.36	1183.16	643.27

¹⁹ N/A indicates that a company did not participate in USPP. 0% indicates that the company reported 0% enrollment for USPP data so the calculation for this table resulted in 0% participation.

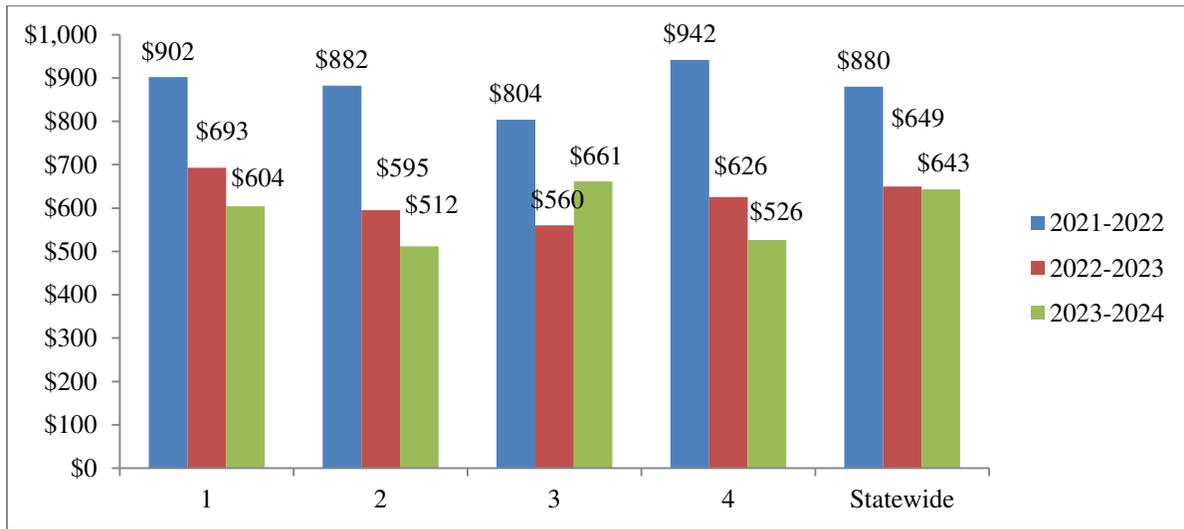
A comparison by poverty level for the recent three heating seasons reveals that the average monthly supplemental payments have fluctuated since the 2020-2021 heating season, where they averaged \$56, and decreased to \$47 in 2021-2022, but have increased steadily to \$52 in 2022-2023, and finally \$61 during 2023-2024. The supplemental payment comparison by poverty level for three consecutive heating seasons is shown in *Error! Not a valid bookmark self-reference..*

Figure 8: Average Monthly Supplemental Payment by USPP Participants by Poverty Level for 2021-2022, 2022-2023, and 2023-2024



The last section of *Table 5* is the average supplemental arrearage balance by poverty level and by utility. The 2023-2024 statewide average supplemental arrearage for USPP participants was \$643, a decrease from \$649 in 2022-2023, which continues the descent from a high of \$1,254 in 2020-2021. This trend is illustrated by *Figure 9*.

Figure 9: Average Supplemental Arrearage Balance by Poverty Level for 2021–2024



The high arrearage balances seen during 2019 were due to the effects of the pandemic. This is because unpaid bills were deferred into the supplemental arrearages which were larger than the pre-pandemic heating season. When compared with pre-pandemic heating seasons such as 2019-2020, the current season’s average supplemental arrearage balance is almost double what it was in 2019—\$373. Prior to the pandemic, there had been a decreasing trend since 2015, and supplemental arrearages reached their lowest point in 2019, but this trend was interrupted by COVID-19’s effect on the wider economy. If the previous decline of average supplemental arrearages from 2015-2016 to 2019-2020 indicated an improvement of the national economic conditions after the 2008 economic recession, then the current decline in average supplemental arrearages indicates that the ongoing pandemic recovery is slowly but surely mitigating the hardship borne by low-income customers for the past three years.

PARTICIPANT ARREARAGES AND PROGRAM COMPLIANCE

Table 6 presents the percentage of USPP participants, MEAP-certified non-USPP participants, and all other non-MEAP residential customers who were in arrears on their utility bills as of March 31, 2024, which is a snapshot scenario. As was the pattern experienced over the previous heating seasons, USPP participants were more likely to be in arrears than either MEAP-certified

non-USPP participants or non-MEAP customers of the utility in the winter heating season. For all data reporting utilities, the percentage of customers in arrears was 39 percent for USPP participants, 33 percent for MEAP-certified non-USPP participants, and 17 percent for non-MEAP-eligible customers as of March 31, 2024. The proportion of USPP participants who were in arrears was about four percentage points higher than the 35 percent observed in the previous period.

Table 6: Percentage of USPP Participants, MEAP-Eligible Customers, and Non-MEAP Customers in Arrears by Poverty Level ²⁰

UTILITY	USPP Participants						MEAP-Eligible Non-Participants						Non-MEAP Customers
	Poverty Level						Poverty Level						
	1	2	3	4	5	Overall	1	2	3	4	5	Overall	
Baltimore Gas and Electric	56%	41%	43%	54%	51%	50%	61%	38%	41%	60%	67%	59%	15%
Chesapeake Utilities – Cambridge Gas Division	0%	0%	0%	0%	0%	0%	42%	28%	38%	0%	100%	30%	21%
Chesapeake Utilities – Citizens Gas Division	0%	0%	0%	0%	0%	0%	28%	21%	86%	100%	100%	23%	15%
Chesapeake Utilities – Sandpiper Energy	0%	0%	0%	0%	0%	0%	27%	22%	22%	40%	0%	24%	5%
Columbia Gas	53%	36%	33%	36%	33%	39%	34%	13%	12%	14%	0%	17%	16%
Delmarva Power & Light	23%	14%	16%	16%	12%	17%	40%	27%	28%	29%	42%	32%	15%
Easton Utilities	50%	11%	22%	40%	0%	22%	30%	13%	20%	29%	44%	21%	16%
Elkton Gas	0%	0%	0%	0%	0%	0%	15%	26%	22%	100%	0%	25%	24%
Hagerstown	0%	0%	0%	0%	0%	0%	14%	8%	7%	9%	18%	9%	22%
Mayor & Council of Berlin	0%	0%	0%	0%	0%	0%	33%	38%	29%	0%	0%	35%	2%
Potomac Electric Power Company	41%	27%	33%	40%	49%	36%	37%	24%	29%	39%	39%	32%	19%
Southern Maryland Electric Cooperative, Inc.	48%	36%	37%	54%	0%	42%	50%	31%	35%	59%	0%	40%	23%
The Potomac Edison Company	34%	15%	13%	28%	0%	22%	25%	15%	16%	22%	0%	19%	14%
Thurmont	0%	0%	0%	0%	0%	0%	22%	0%	0%	0%	0%	22%	23%
UGI Utilities	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	18%
Washington Gas Light Company	5%	5%	3%	6%	8%	5%	42%	27%	35%	41%	47%	36%	21%
Williamsport	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Statewide	45%	29%	32%	41%	50%	39%	40%	24%	28%	44%	46%	33%	17%

²⁰ A USPP customer is considered in arrears if some monthly billing is past due on March 31, 2023.

Table 7 presents the average dollar amount in arrearage balance for USPP participants, MEAP-certified non-USPP participants, and non-MEAP customers making equal payments (instead of supplemental payments). Similar to other USPP arrearages, the current heating season shows a decreasing trend from a pandemic spike but remains elevated above pre-pandemic levels. Currently, the average USPP participant arrearage is \$530, the non-USPP MEAP arrears average \$516, and non MEAP customers average \$335. During the 2022-2023 heating season, the arrears were \$510, \$522, and \$388 respectively. The 2021-2023 heating season before that averaged \$585, \$519, and \$410 respectively. Arrearage levels are fluctuating, but remain elevated when compared to their pre-pandemic levels. Figure 10 illustrates the trend in average arrearage balance borne by low-income customers.

Figure 10: Average USPP Arrearage Balance by Poverty Level for Three Consecutive Heating Seasons for Customers making Equal Payments



Table 7: Average Arrearage Balance for USPP Participants, MEAP-Certified Non-USPP Participants, and Non-MEAP Customers in Arrears by Poverty Level ²¹

UTILITY	USPP Participants						MEAP-Eligible Non-Participants						Non-MEAP Customers
	Poverty Level						Poverty Level						
	1	2	3	4	5	Overall	1	2	3	4	5	Overall	
Baltimore Gas & Electric	\$ 630	\$ 574	\$ 617	\$ 682	\$ 582	\$ 617	\$ 813	\$ 938	\$ 847	\$ 883	\$ 760	\$ 848	\$ 446
Chesapeake Utilities – Cambridge Gas Division	\$ -	\$ -	\$ -	\$ -	N/A	\$ -	\$ -	\$ -	\$ -	\$ -	N/A	\$ -	N/A
Chesapeake Utilities – Citizens Gas Division	\$ -	\$ -	\$ -	\$ -	N/A	\$ -	\$ 458	\$ 178	\$ 374	\$ 413	\$ 117	\$ 308	\$ 318
Chesapeake Utilities – Sandpiper Energy	\$ -	\$ -	\$ -	\$ -	N/A	\$ -	\$ 457	\$ 228	\$ 389	\$ 409	N/A	\$ 371	\$ 228
Columbia Gas of Maryland, Inc.	\$ 225	\$ 158	\$ 250	\$ 273	\$ 268	\$ 235	\$ 394	\$ 434	\$ 343	\$ 445	N/A	\$ 404	\$ 284
Delmarva Power & Light	\$ 1,860	\$ 1,714	\$ 1,666	\$ 1,881	\$ 1,722	\$ 1,769	\$ 905	\$ 744	\$ 751	\$ 894	\$ 1,456	\$ 950	\$ 487
Easton Utilities	\$ -	\$ -	\$ -	\$ -	N/A	\$ -	\$ -	\$ -	\$ -	\$ -	N/A	\$ -	N/A
Elkton Gas	\$ -	\$ -	\$ -	\$ -	N/A	\$ -	\$ 222	\$ 134	\$ 249	\$ 167	\$ -	\$ 154	\$ 188
Hagerstown	\$ -	\$ -	\$ -	\$ -	N/A	\$ -	\$ 209	\$ 233	\$ 233	\$ 175	\$ 138	\$ 198	\$ 234
Mayor & Council of Berlin	\$ -	\$ -	\$ -	\$ -	N/A	\$ -	\$ -	\$ -	\$ -	\$ -	N/A	\$ -	N/A
Potomac Electric Power Company	\$ 1,134	\$ 982	\$ 929	\$ 1,205	\$ 1,089	\$ 1,068	\$ 1,078	\$ 919	\$ 1,052	\$ 1,119	\$ 1,191	\$ 1,072	\$ 459
Southern Maryland Electric Cooperative	\$ 709	\$ 558	\$ 501	\$ 701	N/A	\$ 617	\$ 217	\$ 197	\$ 220	\$ 222	N/A	\$ 214	\$ 396
The Potomac Edison Company	\$ 395	\$ 259	\$ 297	\$ 265	N/A	\$ 304	\$ 483	\$ 334	\$ 292	\$ 343	N/A	\$ 363	\$ 251
Thurmont	\$ -	\$ -	\$ -	\$ -	N/A	\$ -	\$ -	\$ -	\$ -	\$ -	N/A	\$ -	N/A
UGI Utilities	\$ -	\$ -	\$ -	\$ -	N/A	\$ -	\$ -	\$ -	\$ -	\$ -	N/A	\$ -	N/A
Washington Gas Light Company	\$ 430	\$ 496	\$ 218	\$ 331	\$ 228	\$ 341	\$ 651	\$ 561	\$ 609	\$ 681	\$ 768	\$ 654	\$ 397
Williamsport	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Statewide	\$ 538	\$ 474	\$ 448	\$ 534	\$ 778	\$ 530	\$ 535	\$ 445	\$ 487	\$ 523	\$ 633	\$ 516	\$ 335

²¹ N/A indicates that a company did not participate in USPP. 0% indicates that the company reported 0% enrollment for USPP data so the calculation for this table resulted in 0% participation.

Table 8 presents the percentage of USPP participants who complied with the payment provisions of the program for the 2022-2023 heating season and compares those rates to the previous season's results.

According to the USPP provisions, a customer can be removed from the program and a customer's service may be terminated if the amount due on two consecutive monthly bills is not paid. As in previous years, BGE and Columbia Gas reported that, as a matter of company policy, neither removed customers from the program if the customer did not comply with the USPP payment rules during the 2022-2023 heating season. The CUC-Cambridge, CUC-Citizens, CUC-Sandpiper, and Elkton did not report any USPP participants. Therefore, their compliance data are not available. Some municipal companies do not track the percentage of customers who complied with the program rules.

The statewide compliance percentage of approximately 98 percent shown in *Table 8* is similar to the proportion of customers who complied with the USPP payment provisions in the prior 2022-2023 season as well as the 2021-2022 season where it was also 98 percent. It is an improvement from the 94 percent compliance rate in 2020-2021.

Among major utilities, BGE, Columbia, SMECO, and WGL reported 100% compliance rates. Lower compliance rates were reported by Delmarva at 94 percent, PE at 93 percent, and Pepco at 91 percent. Municipal utilities, Berlin, and Easton Utilities reported a compliance rate of 100 and 84 percent, respectively. The compliance rates across all poverty levels in 2023-2024 showed compliance rates by poverty level at 98, 98, 98 and 97 percent for Poverty Levels 1, 2, 3, and 4, respectively.²²

²² The percentage numbers are rounded up to the nearest integer.

Table 8: Percentage of USPP Participants who complied with Program Payment Provisions by Poverty Level during the Last Two Heating Seasons²³

UTILITY	Compliance 2023-2024						Compliance 2022-2023					
	Poverty Level					Overall	Poverty Level					Overall
	1	2	3	4	5		1	2	3	4	5	
Baltimore Gas & Electric	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Chesapeake Utilities - Cambridge Gas	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Chesapeake Utilities - Citizens Gas Division	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Chesapeake Utilities - Sandpiper Energy	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Columbia Gas of Maryland, Inc.	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Delmarva Power & Light	93%	94%	95%	94%	92%	94%	87%	92%	91%	88%	94%	90%
Easton Utilities	50%	94%	89%	60%	100%	84%	50%	94%	100%	89%	0%	86%
Elkton Gas	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Hagerstown	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Mayor & Council of Berlin	100%	100%	100%	0%	0%	100%	100%	100%	100%	0%	0%	100%
Potomac Electric Power Company	91%	93%	90%	88%	86%	91%	83%	92%	87%	82%	87%	86%
Southern Maryland Electric Cooperative	100%	100%	100%	100%	0%	100%	100%	100%	100%	100%	0%	100%
The Potomac Edison Company	94%	91%	95%	88%	0%	93%	96%	96%	94%	91%	0%	95%
Thurmont	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
UGI Utilities	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Washington Gas Light Company	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Williamsport	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
TOTALS	98%	98%	98%	97%	100%	98%	96%	97%	97%	96%	100%	97%

²³ BGE and Columbia Gas of Maryland do not remove customers from USPP for failure to pay the amount due on two consecutive monthly bills. N/A indicates that a company did not participate in USPP or reported 0% so the calculation for this table resulted in not applicable.

HEATING SEASON TERMINATIONS

Table 9 presents the number of USPP participants, MEAP-certified non-USPP participants, and non-MEAP customers whose services were terminated during the winter heating season. Of the 36,410 USPP participants, BGE terminated the vast majority of USPP participants at 1,111 or 86 percent of the statewide total of 1,285. While terminations in 2019-2020 were comparable at approximately 1,403, the 2020-2021 pandemic season saw just 86 terminations, followed by an uptick to 959 terminations in 2021-2022, and 1,243 terminations last year in 2022-2023. The suppressed terminations during the pandemic reflected the utilities’ implementation of the Commission’s actions regarding the disconnection moratorium. Compared to 2019-2020, terminations are approximately eight percent lower.

Figure 11 illustrates the four heating seasons’ terminations mentioned above by poverty level. For the recent four heating seasons, the highest amounts of terminations were concentrated in the lowest income customers.

Figure 11: Service Terminations by Poverty Level for the Recent Four Heating Seasons

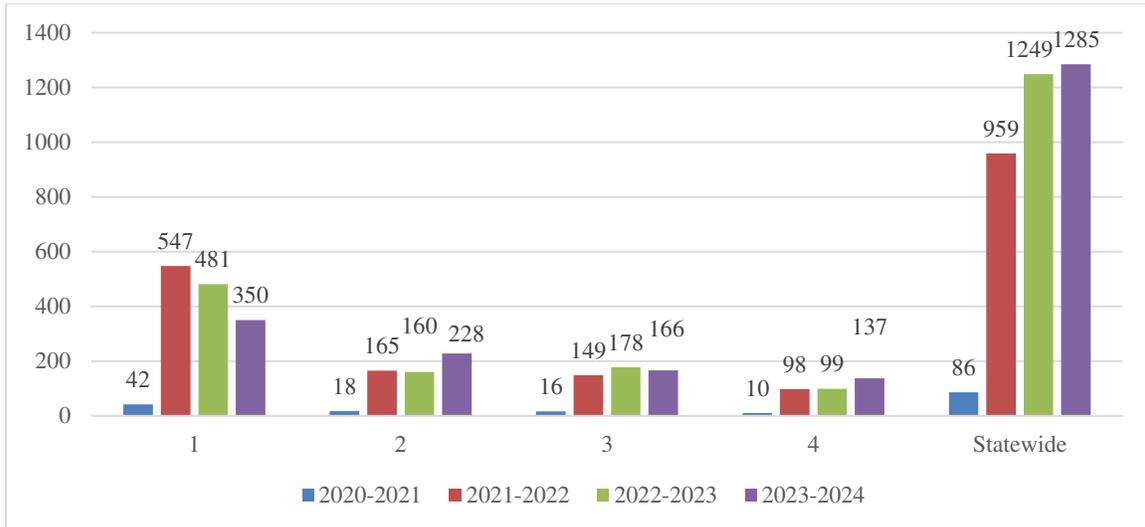


Table 9: Number of Winter Heating Season Terminations²⁴

UTILITY	USPP Participants						MEAP-Certified Non-USPP Participants						Non- MEAP Customers
	Poverty Level						Poverty Level						
	1	2	3	4	5	Overall	1	2	3	4	5	Overall	
Baltimore Gas & Electric	290	185	132	117	387	1,111	31	2	4	175	17	229	7,872
Chesapeake Utilities - Cambridge Gas	-	-	-	-	-	-	-	-	-	-	-	-	-
Chesapeake Utilities - Citizens Gas Division	-	-	-	-	-	-	-	-	-	-	-	-	-
Chesapeake Utilities - Sandpiper Energy	-	-	-	-	-	-	-	-	-	-	-	-	-
Columbia Gas of Maryland, Inc.	-	-	-	-	-	-	-	-	-	-	-	-	125
Delmarva Power & Light	48	37	26	16	12	139	23	8	17	9	43	100	1,157
Easton Utilities	-	-	-	1	-	1	2	-	-	1	-	3	13
Elkton Gas	-	-	-	-	-	-	-	-	-	-	-	-	-
Hagerstown	-	-	-	-	-	-	-	-	-	-	-	-	-
Mayor & Council of Berlin	-	-	-	-	-	-	-	-	-	-	-	-	-
Potomac Electric Power Company	10	6	8	1	5	30	64	30	29	23	28	174	4,072
Southern Maryland Electric Cooperative	-	-	-	-	-	-	-	-	-	-	-	-	578
The Potomac Edison Company	2	-	-	2	-	4	2	3	3	2	-	10	113
Thurmont	-	-	-	-	-	-	-	-	-	-	-	-	-
UGI Utilities	-	-	-	-	-	-	-	-	-	-	-	-	-
Washington Gas Light Company	-	-	-	-	-	-	-	-	-	-	-	-	28
Williamsport	-	-	-	-	-	-	-	-	-	-	-	-	-
TOTALS	350	228	166	137	404	1,285	122	43	53	210	88	516	13,958

HIGH ENERGY CONSUMPTION

Table 10 presents the percentage of USPP participants who consumed more than 135 percent of their utility system’s average usage. Data in this table show the proportions of USPP customers who consume higher-than-average levels of energy by poverty level. Due to this increased consumption, these customers will have higher-than-average heating bills. These higher bills may tend to generate greater arrearages, thereby creating a higher risk of defaulting on payment plans and a greater risk of termination. The energy usage data was not provided by all utilities, as

²⁴ Note: Columbia Gas and Washington Gas each has a no-termination policy during the heating season.

shown in *Table 10*, due to several reasons. Utilities do not need to provide the data if: 1) they have fewer than 5,000 customers, 2) they refer high usage customers to their local agency for weatherization projects, or 3) if they do not track customer usage.

For the 2023-2024 heating season, six utilities reported data. Approximately 59 percent of USPP participants across reporting utilities consumed more than 135 percent of the utilities’ system average usage, which was higher than the 53 percent observed in 2022-2023 and 2021-2022, and higher than the 25 percent observed in the 2020-2021 season prior.

All poverty levels increased by approximately 26 to 30 percentage points from the percentages reported during the 2020-2021 season.

Table 10: Percentage of USPP Participants who consumed more than 135% of System Average Energy during the Most Recent Heating Season ²⁵

UTILITY	Poverty Level					Overall
	1	2	3	4	5	
Baltimore Gas & Electric	53%	53%	54%	56%	54%	54%
Chesapeake Utilities - Cambridge Gas Division	N/A	N/A	N/A	N/A	N/A	N/A
Chesapeake Utilities - Citizens Gas Division	N/A	N/A	N/A	N/A	N/A	N/A
Chesapeake Utilities - Sandpiper Energy	N/A	N/A	N/A	N/A	N/A	N/A
Columbia Gas of Maryland, Inc.	N/A	N/A	N/A	N/A	N/A	N/A
Delmarva Power & Light	84%	91%	89%	89%	84%	88%
Easton Utilities	N/A	N/A	N/A	N/A	N/A	N/A
Elkton Gas	N/A	N/A	N/A	N/A	N/A	N/A
Hagerstown	N/A	N/A	N/A	N/A	N/A	N/A
Mayor & Council of Berlin	N/A	N/A	N/A	N/A	N/A	N/A
Potomac Electric Power Company	86%	88%	90%	92%	91%	89%
Southern Maryland Electric Cooperative	28%	29%	35%	33%	0%	31%
The Potomac Edison Company	32%	27%	41%	34%	0%	33%
Thurmont	N/A	N/A	N/A	N/A	N/A	N/A
UGI Utilities	N/A	N/A	N/A	N/A	N/A	N/A
Washington Gas Light Company	46%	29%	39%	95%	517%	55%
Statewide	59%	58%	59%	64%	58%	59%

²⁵ N/A indicates that a company did not participate in USPP.

PRIMARY HEAT SOURCE

Table 11 presents the percentage of USPP participants, MEAP-certified, non-USPP participants, and non-MEAP customers whose primary heat source is provided by the indicated utility. For all utilities in the 2023-2024 heating season, 61 percent of USPP customers, 67 percent of MEAP-certified non-USPP participants, and 52 percent of non-MEAP customers received their primary heating source from the utility responding to the data request. The percentage of USPP customers using the reporting utilities as their heating source decreased by two percentage points compared to 63 percent in the previous heating season.

The data applicable to the primary heating source vary across utilities. Out of the applicable respondents, the percentage of USPP customers whose primary heating source was provided by the reporting utilities ranged from a low of 16 percent in the case of Pepco to 100 percent for Columbia and WGL, as previously reported. BGE reported 76 percent of USPP customers using BGE as the primary heating source for the 2023-2024 heating season, which combined its electric and gas services. Pepco and PE reported 16 and 79 percent of their customers using them as the heating source, respectively. DPL, an electric-only utility, reported 34 percent.

Table 11: Percentage of Participants, MEAP-Certified Non-USPP Participants, and Non-MEAP Customers whose Primary Heat Source is Provided by the Utility by Poverty Level ²⁶

UTILITY	USPP Participants						MEAP-Certified Non-USPP Participants						Non-MEAP Customers
	Poverty Level						Poverty Level						
	1	2	3	4	5	Overall	1	2	3	4	5	Overall	
Baltimore Gas & Electric	71%	75%	78%	76%	78%	76%	75%	102%	97%	78%	88%	80%	49%
Chesapeake Utilities - Cambridge Gas	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Chesapeake Utilities - Citizens Gas Division	N/A	N/A	N/A	N/A	N/A	N/A	100%	100%	100%	100%	100%	100%	94%
Chesapeake Utilities - Sandpiper Energy	N/A	N/A	N/A	N/A	N/A	N/A	100%	100%	100%	100%	0%	100%	92%
Columbia Gas of Maryland, Inc.	100%	100%	100%	100%	100%	100%	99%	99%	100%	99%	0%	99%	96%
Delmarva Power & Light	30%	37%	26%	40%	113%	34%	42%	45%	40%	42%	37%	42%	35%
Easton Utilities	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Elkton Gas	N/A	N/A	N/A	N/A	N/A	N/A	100%	100%	100%	100%	0%	100%	96%
Hagerstown	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Mayor & Council of Berlin	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potomac Electric Power Company	16%	17%	17%	18%	7%	16%	59%	68%	64%	65%	66%	64%	41%
Southern Maryland Electric Cooperative	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
The Potomac Edison Company	75%	80%	81%	80%	0%	79%	86%	89%	86%	86%	0%	87%	51%
Thurmont	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
UGI Utilities, Inc.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Washington Gas Light Company	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Williamsport	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
TOTALS	56%	57%	58%	60%	78%	61%	66%	66%	65%	71%	67%	67%	52%

²⁶ N/A indicates that a company did not participate in USPP. 0% indicates that the company reported 0% enrollment for USPP data so the calculation for this table resulted in 0% participation.

MEAP GRANTS

Table 12 presents the average MEAP grant payable to the utility at the time of the customer's enrollment in the USPP program. Most USPP participating utilities work closely with OHEP to lower their customers' arrearages and unpaid balances so they may enroll in USPP and be eligible for an alternate payment plan. OHEP's benefit calculation methodology provides larger MEAP grants at poverty levels reflecting lower incomes. No data for Poverty Level 5 was available.

The data indicates that the overall average benefit was \$502 in the 2023-2024 heating season, \$566 in the 2022-2023 heating season, \$650 in the 2021-2022 heating season, \$432 in the 2020-2021 hearing season, and \$513 in 2019-2020 heating season. The fluctuation in benefit over the past five heating seasons shows a minimum MEAP grant during the pandemic, which rose sharply immediately after but has steadily declined since to approximately pre-pandemic levels. The size of the MEAP benefit awarded to customers decreased as the poverty level increased. In this report, customers in Poverty Level 1 received the highest MEAP benefits at approximately \$500, followed by Poverty Levels 3 and 4 at approximately \$485. Regarding utility-specific differences, Columbia, WGL, and BGE customers, received the largest average grants at \$1,049, \$941, and \$729, respectively, as was the case in the previous 2022-2023 season.

**Table 12: Average Maryland Energy Assistance Program Grant for USPP
Participants by Poverty Level for the Last Two Heating Seasons ²⁷**

UTILITY	Average 2023-2024 Grants (\$)					Average 2022-2023 Grants (\$)				
	Poverty Level					Poverty Level				
	1	2	3	4	Overall	1	2	3	4	Overall
Baltimore Gas and Electric	\$855	\$833	\$794	\$729	\$729	\$925	\$913	\$858	\$799	\$812
Chesapeake Utilities - Cambridge Gas	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Chesapeake Utilities - Citizens Gas Division	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Chesapeake Utilities - Sandpiper Energy	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Columbia Gas of Maryland, Inc.	\$996	\$1,013	\$1,054	\$1,057	\$1,049	\$992	\$1,009	\$1,068	\$1,028	\$1,071
Delmarva Power & Light	\$509	\$441	\$479	\$482	\$498	\$625	\$593	\$600	\$600	\$596
Easton Utilities	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Elkton Gas	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Hagerstown	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Mayor & Council of Berlin	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potomac Electric Power Company	\$473	\$394	\$464	\$497	\$456	\$592	\$571	\$582	\$566	\$580
Southern Maryland Electric Cooperative, Inc.	\$700	\$602	\$674	\$648	\$656	\$711	\$655	\$668	\$679	\$678
The Potomac Edison Company	\$417	\$356	\$420	\$420	\$403	\$550	\$552	\$547	\$548	\$549
UGI Utilities	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Washington Gas Light Company	\$1,011	\$737	\$950	\$1,027	\$941	\$1,023	\$972	\$1,070	\$1,030	\$1,058
TOTALS	\$496	\$438	\$484	\$486	\$502	\$542	\$526	\$539	\$525	\$566

²⁷ N/A indicates that a company did not participate in USPP. 0% indicates that the company reported 0% enrollment for USPP data so the calculation for this table resulted in 0% participation.

CONCLUSION

The data reported to the Commission from the participating utilities for the 2023-2024 winter heating season shows the USPP program is both recovering from the 2020-2021 pandemic heating season, while at the same time showing signs of structural changes due to inflationary pressure felt by low-income ratepayers.

The total number of USPP participants has increased steadily since the pandemic low, currently at around 2017 levels. The number of statewide USPP participants was 36,410 during the 2023-2024 heating season, increasing by 9,849 or 37 percent of USPP participants from the 26,561 USPP participants in the 2022-2023 report. The USPP repeat enrollment rate continues to show a decreasing trend from 2010 numbers, though it seems to have settled at about 34 percent, similar to pre-pandemic levels. The USPP enrollment rate as a percentage of total customers has increased steadily from the 2020-2021's 0.48 percent to its current 1.02 percent high.

The average supplemental arrearage at the state level decreased from a peak of \$1,254 during 2020-2021 to \$643 in the current report, which is almost the same as last season. Prior to this, there had been a downward trend where the average supplemental arrearage declined for four consecutive heating seasons since 2015-2016 and was the lowest in the 2019-2020 USPP report. The statewide MEAP grant was somewhere between the \$650 high and \$432 low during the two pandemic years. The higher MEAP grants help USPP participants to pay their unpaid bills and avoid service disconnection.

During the recent two winter heating seasons under the influence of the COVID-19 pandemic, the federal, State, including the Commission, and local governments, and utilities provided much-needed help through public policy and economic assistance. The upward trajectory of terminations in the past decade was dampened by the COVID-19 moratoriums whereby terminations in 2020-2021 were the lowest termination number in any recent period. In summary, this season has seen a mix of the effects of COVID recovery to pre-pandemic levels while also exhibiting the impacts of worsening economic conditions for low-income ratepayers.

APPENDIX A1: 2023-2024 HEATING SEASON REPORTING
UTILITIES BASIC INFORMATION

UTILITY	Participated in USPP	Serving Customers	Service Type	Included in Data Analysis
BGE	Yes	≥ 5,000	Gas and Electric	Yes
Chesapeake Utilities - Cambridge Division	Yes	< 5,000	Gas	Yes
Chesapeake Utilities - Citizens Division	Yes	≥ 5,000	Gas	Yes
Chesapeake Utilities - Sandpiper Energy	Yes	≥ 5,000	Gas	Yes
Columbia Gas of Maryland, Inc.	Yes	≥ 5,000	Gas	Yes
Delmarva Power and Light Company	Yes	≥ 5,000	Electric	Yes
Easton Utilities Commission	Yes	≥ 5,000	Gas and Electric	Yes
Elkton Gas Company	Yes	≥ 5,000	Gas	Yes
Hagerstown Light Department	No	≥ 5,000	Electric	Yes
Mayor & Council of Berlin	Yes	< 5,000	Electric	Yes
Potomac Electric Power Company	Yes	≥ 5,000	Electric	Yes
The Potomac Edison Company	Yes	≥ 5,000	Electric	Yes
Southern Maryland Electric Cooperative	Yes	≥ 5,000	Electric	Yes
Thurmont	No	< 5,000	Electric	No
UGI Utilities, Inc.	Yes	< 5,000	Gas	Yes
Washington Gas Light Company	Yes	≥ 5,000	Gas	Yes
Williamsport Municipal Electric Light Plant	No	< 5,000	Electric	No

APPENDIX A2: 2023-2024 Data Request

**TO ALL GAS AND ELECTRIC UTILITIES PARTICIPATING
IN THE UTILITY SERVICE PROTECTION PROGRAM ("USPP")**

Pursuant to Section 20.31.05.09 of the Code of Maryland Regulations (“COMAR”) entitled *Utility Data Collection*, utilities participating in the USPP are required to compile and maintain certain data, as specified by the Public Service Commission of Maryland (“Commission”), to be filed with the Commission annually. This data is to be collected for the heating season ending March 31, 2024. The data requested below should be provided to the Commission Staff no later than June 14, 2024. This data is required to enable the Commission to fulfill its statutory annual reporting requirement under Section 7-307(c) of the Public Utilities Article, *Maryland Annotated Code*.

The information requested by the Commission is listed below. The requested data pertains to the November 1, 2023 through March 31, 2024 billing months. Where data is requested by poverty level, the reported data should be segmented according to the four comparable poverty levels used by the Department of Human Resources to establish income eligibility for grants from the Maryland Energy Assistance Program (“MEAP”), consistent with COMAR 20.31.05.05.

For the period at issue, the poverty levels were as follows:

Poverty Level 1	0-75%
Poverty Level 2	76-110%
Poverty Level 3	111-150%
Poverty Level 4	151-175%

Please report the data accordingly.

Pursuant to COMAR 20.31.01.08, an alternate payment (referred to by some utilities as a supplemental payment) is defined as a payment made pursuant to a payment plan provided by the utility to the customer to avoid termination of service and to retire all outstanding charges to the utility. The responding utility should report all reasonable alternate/supplemental payment plans that were negotiated in good faith with low-income customers who were unable to pay the charges for service.

To the extent possible, where indicated, please respond to those data request questions which have been broken down as follows: **“as of March 31, 2024”** (to provide a snapshot of the data at a point in time); and **“for the period November 1, 2023 through March 31, 2024”** (to provide cumulative data during the period of analysis).

Municipally-owned utilities and gas or electric utilities with fewer than 5,000 residential customers shall report only the information requested in Section E below.

A. With regard to USPP participants, PLEASE PROVIDE THE FOLLOWING INFORMATION BY POVERTY LEVEL:

1. The total number of customers who enrolled in the USPP program prior to the end of the March 2024 billing cycle. (This number should include any customers who successfully enrolled in USPP even if the customer was later dropped from or otherwise left the program during 2023-2024 winter heating season.)
2. The number of USPP customers included in No. 1 above who were also USPP participants during the previous (**2022-2023**) heating season.
3. The number of USPP customers whose primary heating source is the electric or gas service provided by the responding utility.
4. The number of USPP customers making monthly supplemental payments pursuant to COMAR 20.31.01.08:
 - a) as of the end of the March 2024 billing cycle and please specify the end date of the March 2024 billing cycle;
5. The average dollar amount of the monthly supplemental payments for response A4:
 - a) as of the end of the March 2024 billing cycle; and
 - b) Please explain how the amounts in part a) are calculated.
6. The average dollar amount of the arrearage on which the response for A4 is based:
 - a) as of the end of the March 2024 billing cycle; and
 - b) Please explain how the amounts in part a) are calculated.
7. The number of USPP customers in arrears on monthly USPP equal monthly payments:
 - a) as of the end of the March 2024 billing cycle;
8. The average dollar amount of the arrearage in the response for A7 (this amount should not include any supplemental payments owed by customers):
 - a) as of the end of the March 2024 billing cycle;
9. The average monthly payment obligation, excluding alternate/supplemental payments calculated pursuant to COMAR 20.31.05.06.B. (or recalculated pursuant to COMAR 20.31.05.06.D) and in effect as of the March 2024 billing cycle.
10. The average Maryland Energy Assistance Program grant payable to the utility at the time of enrollment.
11. The number of customers who were dropped from the USPP during the billing months of November 2023 through March 2024 for failing to pay the amount due on two consecutive monthly bills. This number should include customers who were taken off USPP for non-compliance even if they were subsequently reinstated in the program.
12. The number of customers whose utility service was actually terminated during the billing months of November 2023 through March 2024.
13. The number of customers who consumed more than 135% of the system

average for November 2023 through March 2024 (monthly or aggregate figures). Report sample size if sample data are used. (This question need not be answered by utilities providing an alternative prioritized customer list to the Weatherization Assistance Program ["WAP"]. If this is the case, please state in your response that such a list is being provided to the WAP.)

14. The average monthly cost of actual usage by participants for the five billing months of November 2023 through March 2024. (Report sample size if sample data are used). Please provide a sample calculation for USPP participants by poverty level indicating average monthly cost of actual usage during the heating season from November 2023 through March 2024.

B. With regard to MEAP-certified customers who did not participate in the USPP, PLEASE PROVIDE THE FOLLOWING DATA BY POVERTY LEVEL.

1. The number of customers:
 - a) as of the end of the March 2024 billing cycle;
2. The number of customers whose primary heat source is the electric or gas service provided by the responding utility.
3. The number of customers who are in arrears (this should not include any supplemental payments owed by customers):
 - a) as of the end of the March 2024 billing cycle;
4. The average dollar amount of the arrearage referred to in the response to B3:
 - a) as of the end of the March 2024 billing cycle;
5. The number of customers whose utility service was actually terminated during the five billing months of November 2023 through March 2024.
6. The average monthly cost of actual usage for the five billing months of November 2023 through March 2024.

C. With regard to non-MEAP certified residential customers, please provide the following data:

1. The number of customers:
 - a) as of the end of the March 2024 billing cycle;
2. The number of customers whose primary heat source is the electric or gas service provided by the responding utility.
3. The number of customers who are in arrears (this should not include any supplemental payments owed by customers):
 - a) as of the end of the March 2024 billing cycle;
4. The average dollar value of the arrearages in the response for C3:
 - a) as of the end of the March 2024 billing cycle.
5. The number of customers whose utility service was actually terminated during the five billing months of November 2023 through March 2024.

D. With regard to all USPP- eligible customers, please answer the following:

1. a) Please provide a description of each of the utility's supplemental/alternate payment plans offered to or arranged with a USPP customer to address any arrearages.

b) Please indicate whether your company offers any form of budget billing plan to your customers. If so, please explain how the budget billing plan is calculated/determined on a monthly basis and whether the budget plan is the same or different from USPP supplemental/alternate payment plans. If different, please explain.

c) Please provide an example of an USPP participant for each of the following: (i) supplemental payment; (ii) arrearage payments; (iii) even monthly payment arrangements; and (iv) other monthly obligation payment, as they are related to A5, A6, A7, A8, and A9.
2. Please describe how each plan listed above operates, including whether a customer must request the plan or whether a customer is automatically enrolled in the supplemental /alternate payment plan.
3. Please state whether the company has added, modified, or deleted any of the types of supplemental/alternate payment plans offered or arranged during the last reporting period. If yes, please specify what has been added, modified, or deleted.
4. Please provide your comments on the 2023-2024 winter USPP program and suggestions for future USPP program improvements or changes.

E. Municipal utilities and gas or electric utilities with fewer than 5,000 residential customers are requested to provide the following information as specified in Sections A, B, C, and D above. (Responses to any additional items are at the utility's discretion.)

Section A - Items 1, 4, 7, 11, 12

Section B - Items 1, 3, 5.

Section C - Items 1, 3, 5.

Section D – Items 1, 2.