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OF MARYLAND**

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Annotated Code of Maryland

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EXECUTIVE SUMMARY

Consumers' energy bills during the 2010-2011 winter heating season were generally lower than in recent years. Consumers felt this modicum of relief from higher heating bills due to lower gas and electricity prices and to weather conditions that were slightly warmer than normal. Consumers, however, entered the 2010-2011 heating season under considerable financial stress caused by general economic conditions and from much larger energy bills experienced over the past several years. As a result, the number of customers who received energy assistance grew slightly higher than in the previous year. The number of customers whose energy service was terminated in 2010-2011 fell lower than during the previous year. The total Maryland Energy Assistance Program ("MEAP") funding, the number of plan participants and the size of MEAP grants were all higher in 2010-2011 as compared to the 2009-2010 heating season. Plan participants emerged from the heating season with higher arrearage levels.

The primary purpose of the Utility Service Protection Program ("USPP") is to minimize service terminations during the winter, and the 2010-2011 data reported by the participating utility companies indicate that the percentage of terminations among the USPP population was low, despite increasing numbers of customers participating in the program. Service for less than one percent of the USPP population was terminated during the 2010-2011 winter heating season, compared to 1.2 percent in 2009-2010 and 1.4 percent during the 2008-2009 heating season. In 2010-2011, the number of USPP customers whose service was terminated was 819, which was 23 percent fewer than the 1,061 USPP customer terminations during the 2009-2010 heating season. Arrearage balances for participating customers rose from \$399 in 2008-2009 to \$584 during the

2009-2010 heating season, and rose to \$811 in 2010-2011. There were 84,826 USPP participants for the 2010-2011 winter heating season, compared to 84,538 last year, 70,644 in 2008-2009 and 67,916 in 2007-2008. The average MEAP grant provided to USPP participants during 2010-2011 was \$418, compared to \$276 in 2009-2010 and \$470 in 2008-2009.

The data in this USPP report and the USPP report for the previous two heating seasons provide information on Poverty Levels 1, 2, 3 and 4.¹ As was the case for each of the three previous years, Baltimore Gas and Electric Company's ("BGE") reported information on USPP participants for a fifth poverty level category, which is not identified as one of the above-mentioned Poverty Levels.² Data recorded for this additional poverty level category were included in the analysis to be consistent with previous reports.³ In addition to this characteristic, the BGE data are also unique among the reporting utilities in that it alone has gas and electric customers and combines the data for these customers.

BACKGROUND

On March 1, 1988, the Maryland Public Service Commission ("Commission") issued Order No. 67999 in Case No. 8091, which established the Utility Service Protection Program, as required by Article 78, § 54K, which has been recodified as § 7-

¹ Poverty Levels 1, 2, 3, and 4 represent households with incomes measured against the federal poverty levels as follows: 0% up to 75%; more than 75% up to 110%; more than 110% up to 150%; and more than 150% up to 175%, respectively.

² The fifth Poverty Level extends to households with gross income between 175% and 200% of the federal poverty level. This income group received energy assistance through "Project Heat Up," which was funded through general state funds for approximately two years. [Percent symbol used in first footnote; changed to keep consistent footnote style.]

³ The Poverty Level 5 data reported by BGE is included in the "Total" columns in each of the tables, but do not appear as a separate poverty level category. As a result, the figures reported in the "Total" columns for BGE in the tables are not equal to the summation of data for Poverty Levels 1 through 4.

307 of the Public Utilities Article (“PUA”), *Annotated Code of Maryland*. PUA § 7-307 directed 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 heating season. Regulations governing the USPP are contained in COMAR 20.31.05.

In response to numerous customer complaints and inquiries related to high energy bills during the 2008-2009 heating season, the Commission initiated an investigation into the utilities’ practices in handling customers’ arrearages, requests for payment plans, collection practices, and termination policies.⁴ Data provided by the utilities indicated dramatic increases in the number of customers with arrearages, average arrearage balances, and potential customer terminations following the end of the 2008-2009 heating season. To protect residential consumers from having their electric or gas service terminated following the lapse of the winter restrictions under COMAR 20.31.03.03, the Commission issued an Order directing all utilities to refrain from terminating a residential customer’s gas or electric service for delinquent payment or outstanding balances.⁵ The temporary delay of customer terminations was lifted by Commission Order No. 82628, issued April 24, 2009. However, the Commission ordered the large investor-owned utilities to offer alternate payment plans to all customers prior to termination.

The USPP is available to utility customers who are eligible and have applied for a

⁴ Case No. 9175: *In the Matter of Arrearage Collection and Termination Practices of Maryland Electric, Gas, or Electric and Gas Utilities*. See Notice Initiating Proceeding and Notice of Procedural Schedule, January 30, 2009

⁵ *See Re Arrearage, Collection and Termination Practices of Maryland Electric, Gas, or Electric and Gas Utilities*, 100 MD PSC 49, Order No. 82509, issued March 11, 2009 (Case No. 9175).

grant from the Maryland Energy Assistance Program, which is administered by the Office of Home Energy Programs (“OHEP”). The USPP is designed to protect eligible low-income residential customers from utility service termination during the winter. The USPP helps low-income customers avoid the accumulation of arrearages, which could lead to service terminations, by requiring timely equal monthly utility payments for participants based on the estimated cost of annual service to the household. The USPP allows customers in arrears to restore service by accepting the USPP equal payment plan and by bringing outstanding arrearages to no more than \$400. The program 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. *See* COMAR 20.31.05.03.

PUA § 7-307 requires the Commission to submit an annual report to the General Assembly addressing terminations of service during the previous heating season. To facilitate the compilation of this report, the Commission directs all gas and electric utilities to collect specific data (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, MEAP eligible non-participants, total utility customers, and current participants who also participated 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.⁶ Utilities serving residential customers in Maryland submitted data for this report. The Commission's March 2011 data request contained the same questions as those in the USPP Data Request issued for the 2009-2010 heating season and was similar to previous USPP data requests.⁷ This report provides an analysis and summary of that information.⁸

PROGRAM PARTICIPATION

Table 1 shows the number of USPP participants for each utility by Poverty Level. There were 84,826 participants in the USPP program during the 2010-2011 heating season. This represents an increase of 288 customers over the participation level recorded last year (84,538) and 13,874 or 20 percent over the participation level recorded for the 2008-2009 heating season (70,664). The number of eligible non-participants statewide decreased to 17,681 or by over 250 customers from last year (18,219).

⁶ The data request was issued to BGE, Chesapeake Utilities-Cambridge Gas Division ("Cambridge"), Chesapeake Utilities-Citizens Gas Division ("Citizens"), Choptank Electric Cooperative ("Choptank"), Columbia Gas of Maryland ("Columbia"), Delmarva Power & Light ("Delmarva" or "DPL"), Easton Utilities Commission-Electric ("Easton-Electric"), Easton Utilities Commission-Gas ("Easton-Gas"), Elkton Gas Service ("Elkton"), Washington Gas Light Company ("Washington Gas"), Hagerstown Municipal Electric ("Hagerstown"), Mayor & Council of Berlin ("Berlin"), The Potomac Edison Company ("Potomac Edison"), Potomac Electric Power Company ("Pepco"), Somerset Rural Electric Cooperative ("Somerset"), and Southern Maryland Electric Cooperative ("SMECO").

⁷ The USPP Data Request was expanded in 2007.

⁸ 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. Similarly, Berlin, Somerset, Williamsport, UGI, and Thurmont are municipality-owned utilities 5,000 customers or less. As such, those utilities were required to provide a limited amount of data.

The largest increase in USPP participation during the 2010-2011 heating season was recorded by BGE, whose participant numbers rose by 3,396, to 54,707 from 50,674 during the previous year. In 2010-2011, BGE's 54,070 USPP participants accounted for 64 percent of all the 2010-2011 USPP participants. Delmarva enrolled 9,647 customers in the USPP during 2010-2011, which was the second highest number enrolled by any utility company. This number represented 11.4 percent of all USPP 2010-2011 participants. Pepco had the third highest USPP participation level, with 7,239 customers enrolled for the 2010-2011 winter heating season, representing 8.5 percent of the total number enrolled by all companies. WGL reported participation by 4,215 customers or 5.0 percent of the total. Thus, the two largest utilities enrolled 75 percent of the USPP customers and the four largest utilities accounted for 89 percent of USPP enrollment.

Table 2 presents USPP participation as a percentage of the total number of MEAP-eligible customers for the 2010-2011 and 2009-2010 heating seasons. The overall rate of customer participation in the USPP for all utility companies for the 2010-2011 winter heating season was 83 percent, one percentage point higher than in 2009-2010. As was the case for the 2009-2010 heating season, Pepco, Choptank, and Somerset reported that one hundred percent of eligible customers participated in the USPP during 2010-2011. Ninety-four percent of eligible BGE customers participated in the USPP program during 2010-2011, compared to 93 percent in 2009-2010.

Table 3 shows the percentage of customers that were USPP participants in the 2010-2011 and 2009-2010 heating seasons. Overall, there was a 14 percentage point increase in the "consecutive year participation rate." Seventy-one percent of the USPP participants during the 2010-2011 heating season were also enrolled in the USPP during

the 2009-2010 heating season. That figure is up from the 57 percent consecutive year participation rate recorded last year and the 49 percent rate recorded in the 2008-2009 heating season. Among the major utilities, the highest percentages of consecutive year enrollments were recorded by BGE (89 percent), and Washington Gas (51 percent). As noted in last year's report, the smaller utilities recorded the highest consecutive year enrollment participation rates. For example, Easton-Electric and Easton-Gas recorded consecutive-year participation rates of 75 percent and 73 percent, respectively, whereas Choptank recorded a consecutive-year participation rate of 74 percent during the most recent heating season.

EQUAL MONTHLY PAYMENTS AND ACTUAL HEATING SEASON USAGE

Table 4 compares the average equal monthly billings to actual energy usage measured in dollars for USPP participants. The average monthly billings represent customers' payment obligations and are based on the average usage during the five billing months of the prior year heating season. The differences between the average monthly usage and the average monthly payment obligations represent the fact that the USPP attempts to keep heating bills affordable during the heating season. Unpaid utility bill balances that accrue during the heating season must be paid during the non-heating season to keep arrearage levels from increasing. While average monthly usage and average monthly payment obligation levels fell across all Poverty Levels in the 2010-2011 heating season, the difference between those figures increased.

Average monthly usage for USPP participants fell by approximately 6 percent during the 2010-2011 heating season from the level one year earlier, and was 16 percent lower than 2008-2009 levels. During the 2010-2011 heating season, average monthly

usage for USPP participants fell to \$215 on a statewide basis, from average monthly usage of \$228 during the 2009-2010 heating season and from \$257 during the 2008-2009 heating season. Year-over-year declines in usage were reported across all Poverty Levels. Among the major utilities, decreases were recorded for BGE, WGL, DPL, and Pepco, whereas Potomac Edison recorded a small increase. On a Poverty Level basis, usage fell by 11 percent for Poverty Level 4 participants, by 9 percent for Poverty Level 3 participants, and by 8 percent for participants in Poverty Levels 2 and 1. Among the major utilities, usage by USPP participants in BGE's service territory fell by 5.5 percent to \$259 from \$274 in 2009-2010 and from \$318 in 2008-2009. Similarly, DPL recorded a decline in usage among USPP participants of 32 percent to \$122 from \$179 last year, and from \$200 in 2008-2009. Usage by USPP participants for WGL fell by 7 percent from \$126 last year to \$117 in 2010-2011. Pepco recorded a decrease of 11.7 percent from \$188 in 2009-2010 to \$166 in 2010-2011. Usage by Potomac Edison's customers rose by 3 percent from \$96 in 2009-2010 to \$99 in 2010-2011.

Average monthly payment obligations by USPP participants fell for all Poverty Levels by approximately 13.4 percent from \$149 in 2009-2010 to \$129 in 2010-2011. With the exception of Potomac Edison, average monthly payment obligations fell for each of the major utilities in 2010-2011 as compared with the 2009-2010 heating season. Average monthly payment obligations made by WGL's USPP customers fell by 32.3 percent to \$84 from \$124. The next largest decrease was reported by BGE whose USPP customers realized a 16.3 percent decrease in average monthly payment obligations to \$134 from \$160. Comparable figures for DPL and Pepco were -13.3 percent and -1.8

percent, respectively. Average monthly payment obligations made by Potomac Edison's USPP customers rose during 2010-2011 by 6.3 percent from \$144 to \$153.

SUPPLEMENTAL PAYMENTS AND 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 utilities to offer customers who have outstanding arrearages to place all or part of those arrearages in a special agreement or an alternate payment plan, to be paid off over an extended period of time. Although the deferred payment arrangements vary, all utilities provide for enrollment in supplemental payment plans. Placing outstanding arrearages in special agreements allows customers to enroll in USPP and to 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.

The data indicated that at the end of the 2010-2011 heating season, the average supplemental arrearage levels were lower than for the previous year for all Poverty Levels, while the monthly supplemental payments were higher for all Poverty Levels, and the percentage of USPP participants making supplemental payments was either higher or the same. Average supplemental arrearage balances during the 2010-2011 heating season were approximately 3.6 percent lower for all Poverty Levels, whereas the average monthly supplemental payments across all Poverty Levels in 2010-2011 were 7.3 percent higher. As previously indicated, the percentage of USPP participants making supplemental payments increased on a year-over-year basis during the 2010-2011 heating season. Twenty-four percent of Poverty Level 1 USPP recipients for all utilities made

supplemental payments in 2010-2011, whereas 25 percent of Poverty Level 2 participants, 27 percent of Poverty Level 3 participants, and 32 percent of Poverty Level 4 USPP customers made supplemental payments. Those figures are 0 to 3 percentage points higher than comparable Poverty Level figures recorded during the prior heating season.

PARTICIPANT ARREARAGES AND PROGRAM COMPLIANCE

Table 6 presents the percentage of USPP participants, MEAP-eligible non-participants, and all other utility residential customers who were in arrears on their utility bills as of March 31, 2011. This means that the customer had failed to pay the total amount due on at least one equal monthly billing.

As in previous years, USPP participants during 2010-2011 were less likely to be in arrears to the utility than eligible non-participants, but much more likely to be in arrears than non-MEAP-eligible customers. For all utilities, 31 percent of USPP participants, 39 percent of eligible non-participants, and 16 percent of non-MEAP-eligible customers were in arrears as of March 31, 2011. In comparison with the 2009-2010 winter heating season, the proportion of USPP participants that were in arrears on March 31, 2011, was lower by five percentage points, whereas the proportion of eligible non-participants and non-MEAP customers in arrears remained about the same.

With the exception of Pepco, each of the major electric utilities recorded lower proportions of USPP participants that were in arrears on March 31, 2011, when compared to the same date last year. Pepco reported that 73 percent of USPP participants were in arrears in 2010-2011, compared to 44 percent in 2009-2010. In contrast, BGE reported that 30 percent of its USPP participants were in arrears, which is 10 percentage points

lower than the 40 percent reported for the 2009-2010 heating season. Similarly, 20 percent of DPL's USPP customers (compared to 28 percent in 2009-2010), 1 percent of WGL's USPP customers (compared to 4 percent in 2009-2010) and 35 percent of Potomac Edison's USPP customers (compared to 41 percent in 2009-2010) were in arrears on March 31, 2011.

Table 7 presents the average dollar amount of arrearages for USPP participants, eligible non-participants, and non-eligible customers who are in arrears. Average arrearage balances for USPP customers rose from prior year levels, whereas average arrearage balances decreased for non-MEAP eligible customers and non-MEAP customers. For the 2010-2011 heating season, the overall average arrearage for USPP participants were \$811, an increase of 39 percent over the 2009-2010 amount of \$584 and more than double the 2008-2009 level of \$399. In 2010-2011, the average arrearage balance for non-MEAP eligible customers who were in arrears decreased by 12 percent, from \$612 in 2009-2010 to \$539 in 2010-2011, whereas the arrears for non-MEAP customers fell by 3.5 percentage points, from \$425 to \$410. Among the major utilities, the average arrearage balance for USPP participants rose for BGE and WGL and decreased for DPL, Potomac Edison, and Pepco. The highest average arrearage balance for USPP participants was recorded by BGE (\$1,273), followed by DPL (\$536) and SMECO (\$531). BGE and DPL also recorded the highest and second highest average arrearage balances for MEAP eligible non-participants, as well as for non-MEAP eligible customers during the 2010-2011 heating season. Average arrearage balances for eligible non-participants for BGE and DPL were \$851 and \$775, respectively, and for non-MEAP customers were \$611 and \$446, respectively.

Table 8 presents the percentage of USPP participants who complied with the payment provisions of the program for the 2010-2011 heating season and compares that data to the previous year'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 was the case for the 2009-2010 heating season, BGE reported that, as a matter of company policy, it did not remove customers from the program if the customer fell out of compliance with the USPP payment rules during the 2010-2011 heating season. Because it does not enforce this provision of the program, BGE does not track the percentage of customers who complied with the program rules. Also, for that reason, the statewide compliance percentage of approximately 92 percent shown on Table 8, overstates the proportion of customers whose continuity of service is at risk as a result of payment issues.

The most recently available data indicate that there were no meaningful differences in the compliance percentage for the 2010-2011 heating season and the prior year. The overall compliance percentages for the 2010-2011 and 2009-2010 heating seasons were 92 percent. Also, as was the case during the prior heating season, the compliance percentage during 2010-2011 did not vary by material amounts across poverty levels. During 2010-2011, the compliance percentages ranged from 87 percent for Poverty Level 4 to 90 percent for Poverty Level 2 participants. During the previous heating season, the compliance rates ranged from 89 percent for Poverty Levels 2 and 4 participants to 91 percent for Poverty Level 2 participants. Somerset achieved 100 percent compliance with the USPP payment obligations during 2010-2011 and 2009-

2010, whereas Potomac Edison, Elkton, and SMECO all reported compliance rates that were very close to 100 percent.

HEATING SEASON TERMINATIONS

Table 9 presents the number of USPP participants, eligible non-participants, and non-MEAP customers who had their service terminated during the heating season. The primary purpose of the USPP is to prevent service terminations during the heating season. The data indicate that the USPP program was successful in mitigating utility service terminations.

Of the total number of USPP participants (84,826), Maryland's utilities collectively terminated 819 USPP participants. This is equivalent to 0.97 percent of the USPP participant population or approximately one termination for every 103 customers enrolled in the USPP program. The number of participants terminated and the percentage of participants terminated both fell during the 2010-2011 heating season compared to the 2009-2010 heating season. Also, the percentage of terminations for plan participants was lower than the percentage of termination in the MEAP eligible non-participant group in both of the last two heating seasons.

As indicated in Table 9, seven of the 16 utilities for which data are available did not terminate any USPP participants during the 2010-2011 winter heating season. The utilities with no USPP terminations were: Columbia, Easton-Electric and Easton-Gas, Berlin, Potomac Edison, Somerset, and SMECO. Four utilities; BGE, Potomac Edison, Choptank, and DPL accounted for 98 percent of the USPP participant terminations during the 2010-2011 heating season. BGE terminated 443 USPP participants during the 2010-2011 heating season, which represented .82 percent of BGE's total number of plan

participants and accounted for 54 percent of all USPP participant terminations during the 2010-2011 heating season. Pepco's 137 USPP participant terminations represented a termination rate 1.89 percent and accounted for 17 percent of the total number of USPP participant terminations during the 2010-2011 heating season. Choptank terminated 127 USPP participants, which represented a 3.97 percent termination rate and accounted for 16 percent of the total number of terminations. DPL's 94 USPP participant terminations represented .97 percent of its plan participants and accounted for 11 percent of all USPP participant terminations.

HIGH ENERGY CONSUMPTION

Table 10 presents the percentage of USPP participants who consumed more than 135 percent of the respective utility's system average use. Data in this table show the proportions of USPP customers by Poverty Level who consume higher than average levels of energy. These consumers will have higher than average heating bills and will place a higher than average burden on the USPP.

For the 2010-2011 heating season, 38 percent of USPP participants consumed more than 135 percent of the respective utility's system average usage. That figure is up from the 35 percent reported during the 2009-2010 heating season and the 29 percent reported for the prior heating season. The proportion of USPP customers reporting more than 135 percent of system average use does not vary much across poverty levels. Consumption exceeding 135 percent of system average use was reported by 40 percent of Poverty Level 1 participants, 39 percent of Poverty Level 2 participants, 39 percent of Poverty Level 3 participants, and 42 percent of Poverty Level 4 participants. Potomac

Edison, Pepco, and BGE reported the highest overall percentages of USPP customers consuming more than 135 percent of the system average in 2010-2011.

PRIMARY HEAT SOURCE

Table 11 presents the percentage of USPP participants, eligible non-participants, and non-MEAP customers whose primary heat source is provided by the indicated utility. Although the data reported for this statistic vary greatly across the utilities, they do not vary much over time for any utility.

For all utilities in 2010-2011, 80 percent of USPP customers, 71 percent of eligible non-participants, and 87 percent of non-MEAP customers receive their primary heat source from the utility responding to the data request. These results for the most recent heating season are very similar to the prior season's percentage of customers obtaining the primary heat source from the serving utility. Citizens, Columbia, Easton-Electric, Easton-Gas, Elkton, WGL, and Potomac Edison reported that all or very nearly all of both USPP participants and eligible non-participants received their primary heat source from the utility during 2010-2011. BGE provides the primary heat source to 84 percent of its USPP participants, 82 percent of its eligible non-participants, and 80 percent of its non-MEAP customers. DPL provides the primary heat source for approximately 68 percent of its USPP customers, whereas the percentage for Pepco is approximately 55 percent.

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. OHEP's benefit calculation methodology

provides for larger MEAP grants because a customer's poverty level reflects lower income.

The data indicate that the overall level of benefit rose to \$418 per USPP customer in 2010-2011 from \$276 in 2009-2010. As seen in previous years, the size of the MEAP benefit awarded to customers in 2010-2011 decreased as the Poverty Level increased. Customers in Poverty Level 1 received an average MEAP benefit of \$506, whereas those in Poverty Levels 2, 3, and 4 received benefit amounts of \$428, \$351, and \$272, respectively. Viewed from the perspective of specific utilities, the data show that customers of Choptank and Pepco received the largest average MEAP benefit of all utilities (\$663 and \$605, respectively), whereas customers of SMECO and DPL received MEAP grants of \$593 and \$585, respectively, followed by customers of Easton-Electric (\$445) and BGE (\$410).

CONCLUSION

The data collected for the winter 2010-2011 winter heating season show that the Utility Service Protection Program continues to minimize the number of service terminations among eligible consumers, even though the numbers of customers participating in the program increased. There were 84,826 USPP participants during the 2010-2011 heating season, which is an increase of 288 or 0.3 percent above the 2009-2010 level of 84,538. Of that total, 0.97 percent, or 819 customers, were terminated during the 2010-2011 heating season. The percentage of terminations for USPP participants during 2010-2011 was lower than for eligible non-participants. The relatively low number of terminations indicates that the USPP is helping to keep low-income customers' service connected during the winter. However, the overall average

arrears for participating customers increased by 39 percent from \$584 in 2009-2010 to \$812 in 2010-2011, although the average arrears level for MEAP eligible non-participants during the same period fell by 11.9 percent, from \$612 to \$539.

In addition to the winter protections offered by USPP to low-income customers and the financial assistance to low-income customers from the MEAP and Electric Universal Service Program, utilities providing electric or gas service in Maryland operated other specific programs dedicated to assisting low-income customers during the 2010-2011 heating season. These programs varied from utility to utility, but all are focused on helping low-income customers with billing or related issues. In addition, the Commission has taken other specific actions, particularly in Case No. 9175 to protect consumers during the heating season. The survey results of the 2010-2011 heating season reflect the capability of the USPP, as well as other Commission and Commission-approved initiatives, to benefit low-income customers.

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

	USPP Participants					MEAP Eligible Non-Participants					Overall
	Poverty Level 1	Poverty Level 2	Poverty Level 3	Poverty Level 4	Total	Poverty Level 1	Poverty Level 2	Poverty Level 3	Poverty Level 4	Total	Total
Baltimore Gas & Electric¹	11,407	7,098	7,746	3,924	54,070	1,340	614	610	250	3,362	57,432
Chesapeake Utilities-Cambridge Gas Division	72	43	35	9	159	93	60	34	20	207	366
Chesapeake Utilities-Citizens Gas Division	20	15	7	5	47	299	292	195	90	876	923
Choptank Electric Cooperative	1,000	940	902	359	3,201	5	2	2	0	9	3,210
Columbia Gas of Maryland	465	481	414	151	1,511	271	298	375	137	1,081	2,592
Delmarva Power & Light	3,563	2,916	2,338	830	9,647	1,206	782	746	316	3,050	12,697
Easton Utilities-Electric	55	50	55	13	173	86	105	133	45	369	542
Easton Utilities-Gas	26	20	19	8	73	35	48	40	12	135	208
Elkton Gas Service	*	*	*	*	319	*	*	*	*	73	392
Washington Gas	1,653	1,063	1,025	474	4,215	689	468	506	250	1,913	6,128
Hagerstown Municipal Electric	**	**	**	**	**	147	157	98	26	428	428
Mayor & Council - Berlin	70	66	37	14	204	13	10	8	6	33	237
The Potomac Edison Company	885	734	654	266	2,539	976	832	787	265	2,860	5,399
Potomac Electric Power Company	2,282	1,710	2,112	1,135	7,239	0	0	0	0	0	7,239
Somerset Rural Electric Cooperative	*	*	*	*	132	0	0	0	0	0	132
Southern Maryland Electric Cooperative	554	328	305	110	1,297	1,347	872	769	297	3,285	4,582
TOTALS:	22,052	15,464	15,649	7,298	84,826	6,507	4,540	4,303	1,714	17,681	102,507

* Not available or not available by poverty level.

** Offers an approved alternate USPP to all MEAP eligible customers.

¹ BGE provides data categorized into 5 poverty levels. Therefore the entries shown for the first 4 poverty levels do not sum to the total.

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

UTILITY	2010 - 2011 Participation					2009 - 2010 Participation				
	Poverty Level 1	Poverty Level 2	Poverty Level 3	Poverty Level 4	Overall	Poverty Level 1	Poverty Level 2	Poverty Level 3	Poverty Level 4	Overall
Baltimore Gas & Electric ¹	89%	92%	93%	94%	94%	88%	92%	92%	93%	93%
Chesapeake Utilities-Cambridge Gas Division	44%	42%	51%	31%	43%	48%	53%	50%	36%	49%
Chesapeake Utilities-Citizens Gas Division	6%	5%	3%	5%	5%	17%	9%	13%	11%	13%
Choptank Electric Cooperative	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Columbia Gas of Maryland	63%	62%	52%	52%	58%	61%	60%	51%	53%	57%
Delmarva Power & Light	75%	79%	76%	72%	76%	75%	79%	74%	74%	76%
Easton Utilities-Electric	39%	32%	29%	22%	32%	35%	36%	37%	32%	36%
Easton Utilities-Gas	43%	29%	32%	40%	35%	35%	37%	23%	30%	32%
Elkton Gas Service	*	*	*	*	81%	*	*	*	*	87%
Washington Gas	71%	69%	67%	65%	69%	69%	69%	69%	67%	69%
Hagerstown Municipal Electric	**	**	**	**	**	**	**	**	**	**
Mayor & Council - Berlin	*	*	*	*	*	*	*	*	*	*
The Potomac Edison Company	48%	47%	45%	50%	47%	51%	46%	45%	47%	48%
Potomac Electric Power Company	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Somerset Rural Electric Cooperative	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Southern Maryland Electric Cooperative	29%	27%	28%	27%	28%	35%	35%	37%	35%	36%
TOTALS:	77%	77%	78%	81%	83%	77%	78%	79%	82%	82%

* Not available or not available by poverty level.

** Offers an approved alternate USPP to all MEAP eligible customers.

¹ BGE provides data categorized into 5 poverty levels. The "Overall" column is a weighted average of all 5 poverty levels.

TABLE 3
PERCENTAGE OF 2010-2011 USPP PARTICIPANTS WHO ALSO PARTICIPATED IN THE PROGRAM DURING THE PRIOR HEATING SEASON

UTILITY	Poverty Level				
	Poverty Level 1	Poverty Level 2	Poverty Level 3	Poverty Level 4	Overall
Baltimore Gas & Electric¹	81%	81%	80%	76%	89%
Chesapeake Utilities-Cambridge Gas Division	*	*	*	*	*
Chesapeake Utilities-Citizens Gas Division	30%	20%	14%	0%	21%
Choptank Electric Cooperative	73%	78%	74%	73%	74%
Columbia Gas of Maryland	*	*	*	*	*
Delmarva Power & Light	38%	48%	47%	38%	43%
Easton Utilities-Electric	73%	86%	71%	62%	75%
Easton Utilities-Gas	85%	75%	58%	63%	73%
Elkton Gas Service	0%	0%	0%	0%	0%
Washington Gas	52%	56%	46%	44%	51%
Hagerstown Municipal Electric	**	**	**	**	**
Mayor & Council - Berlin	***	***	***	***	***
The Potomac Edison Company	47%	45%	44%	31%	44%
Potomac Electric Power Company	17%	26%	21%	20%	21%
Somerset Rural Electric Cooperative	*	*	*	*	*
Southern Maryland Electric Cooperative	22%	39%	31%	31%	30%
TOTALS:	60%	61%	59%	57%	71%

* Not available or not available by poverty level.

** Offers an approved alternate USPP to all MEAP eligible customers.

*** Municipality owned utility having less than 5,000 customers and is not required to submit data.

¹ BGE provides data categorized into 5 poverty levels.

The "Overall" column is a weighted average of all 5 poverty levels.

TABLE 4

**AVERAGE EQUAL MONTHLY PAYMENT OBLIGATIONS AND AVERAGE ACTUAL MONTHLY HEATING SEASON USAGE
FOR USPP PARTICIPANTS BY POVERTY LEVEL**
**AVERAGE EQUAL MONTHLY PAYMENT OBLIGATION AND AVERAGE ACTUAL MONTHLY HEATING SEASON USAGE
FOR USPP PARTICIPANTS BY POVERTY LEVEL**

UTILITY	Average Monthly Payment Obligation (\$)					Average Actual Monthly Usage (\$) ²				
	Poverty Level 1	Poverty Level 2	Poverty Level 3	Poverty Level 4	Overall	Poverty Level 1	Poverty Level 2	Poverty Level 3	Poverty Level 4	Overall
Baltimore Gas & Electric ¹	131.00	137.00	127.00	153.00	134.25	260.39	257.91	256.88	256.65	258.76
Chesapeake Utilities-Cambridge Gas Division	**	**	**	**	**	**	**	**	**	**
Chesapeake Utilities-Citizens Gas Division	121.00	121.00	128.00	126.00	122.57	180.80	161.40	182.00	140.40	170.45
Choptank Electric Cooperative	152.79	131.41	146.23	167.12	146.27	**	**	**	**	180.95
Columbia Gas of Maryland	48.36	49.92	57.83	66.33	53.25	179.20	175.59	183.34	192.80	181.36
Delmarva Power & Light	127.00	122.00	143.00	145.00	130.91	121.00	121.00	124.00	125.00	122.15
Easton Utilities-Electric	142.00	150.00	223.00	205.00	174.80	318.00	345.00	266.00	325.00	307.79
Easton Utilities-Gas	247.00	210.00	175.00	298.00	223.71	342.00	275.00	209.00	347.00	279.21
Elkton Gas Service	**	**	**	**	40.00	**	**	**	**	74.00
Washington Gas	77.84	84.58	91.16	88.57	83.99	114.82	116.19	120.29	121.22	117.44
Hagerstown Municipal Electric	***	***	***	***	***	***	***	***	***	***
Mayor & Council - Berlin	****	****	****	****	****	****	****	****	****	****
The Potomac Edison Company	156.00	147.00	152.00	168.00	153.63	102.20	94.20	97.60	110.40	99.37
Potomac Electric Power Company	94.00	105.00	119.00	137.00	110.63	157.00	166.00	166.00	175.00	166.00
Somerset Rural Electric Cooperative	**	**	**	**	**	**	**	**	**	**
Southern Maryland Electric Cooperative	206.63	177.62	212.75	194.36	199.69	109.62	97.21	104.17	111.12	105.19
TOTALS:	124.00	124.47	127.77	145.24	128.96	191.09	181.16	188.19	198.05	214.71

** Not available or not available by peoverty levelby poverty level.

*** Offers an approved alternate USPP to all MEAP eligible customers.

**** Municipality owned utility having less than 5,000 customers and is not required to submit data.

¹ BGE provides data categorized into 5 poverty levels. The "Overall" column is a weighted average of all 5 poverty levels.

² Average monthly usage for five billing months of November 2009 - March 2010.

TABLE 5

PERCENTAGE OF USPP CUSTOMERS MAKING SUPPLEMENATAL PAYMENTS*, THE AVERAGE DOLLAR AMOUNT OF THOSE PAYMENTS, AND THE AVERAGE ARREARAGE REQUIRING PAYMENTS BY POVERTY LEVEL

UTILITY	Percentage of USPP Customers Making Supplemental Payments				Average Monthly Amount of Supplemental Payments (\$)				Average Supplemental Arrearage (\$)			
	Poverty Level 1	Poverty Level 2	Poverty Level 3	Poverty Level 4	Poverty Level 1	Poverty Level 2	Poverty Level 3	Poverty Level 4	Poverty Level 1	Poverty Level 2	Poverty Level 3	Poverty Level 4
Baltimore Gas & Electric	12%	12%	14%	20%	120.00	111.00	112.00	107.00	1397.00	1213.00	1334.00	1184.00
Chesapeake Utilities-Cambridge Gas Division	1%	0%	3%	0%	**	**	**	**	**	**	**	**
Chesapeake Utilities-Citizens Gas Division	15%	13%	71%	20%	65.00	0.00	32.00	0.00	400.00	0.00	146.00	0.00
Choptank Electric Cooperative	**	**	**	**	**	**	**	**	**	**	**	**
Columbia Gas of Maryland	58%	45%	42%	60%	17.09	17.41	21.35	20.02	242.72	229.43	208.25	193.68
Delmarva Power & Light	44%	39%	47%	54%	9.65	11.57	14.93	17.33	559.00	510.00	526.00	562.00
Easton Utilities-Electric	16%	10%	22%	0%	175.00	225.00	101.00	212.00	128.00	298.00	359.00	108.00
Easton Utilities-Gas	8%	30%	5%	13%	238.00	58.00	72.00	113.00	376.00	172.00	138.00	453.00
Elkton Gas Service	**	**	**	**	**	**	**	**	**	**	**	**
Washington Gas	6%	6%	6%	7%	130.63	133.57	101.58	89.13	400.22	407.57	412.70	320.16
Hagerstown Municipal Electric	***	***	***	***	***	***	***	***	***	***	***	***
Mayor & Council - Berlin	**	**	**	**	**	**	**	**	**	**	**	**
The Potomac Edison Company	47%	55%	56%	58%	101.00	91.00	93.00	109.00	91.00	25.00	28.00	50.00
Potomac Electric Power Company	59%	65%	62%	67%	64.00	59.00	60.00	58.00	936.00	913.00	905.00	908.00
Somerset Rural Electric Cooperative	**	**	**	**	**	**	**	**	**	**	**	**
Southern Maryland Electric Cooperative	43%	41%	48%	43%	61.59	66.21	50.13	54.69	512.88	532.00	455.60	504.00
TOTALS:	24%	25%	27%	32%	64.19	58.98	63.38	68.99	809.60	707.18	788.91	832.12

* Under COMAR 20.31.01.08.

** Not available or not available by poverty level.

*** Offers an approved alternate USPP to all MEAP eligible customers.

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

UTILITY	USPP Participants					MEAP Eligible Non-Participants					Non-MEAP Customers
	Poverty Level 1	Poverty Level 2	Poverty Level 3	Poverty Level 4	Overall	Poverty Level 1	Poverty Level 2	Poverty Level 3	Poverty Level 4	Overall	
Baltimore Gas & Electric ¹	67%	20%	19%	22%	30%	48%	43%	41%	42%	44%	16%
Chesapeake Utilities-Cambridge Gas Division	3%	5%	6%	0%	4%	58%	40%	41%	40%	48%	35%
Chesapeake Utilities-Citizens Gas Division	0%	0%	0%	0%	0%	44%	33%	34%	39%	38%	17%
Choptank Electric Cooperative	4%	3%	4%	6%	4%	40%	0%	50%	0%	33%	13%
Columbia Gas of Maryland	35%	16%	18%	18%	23%	32%	14%	14%	16%	19%	15%
Delmarva Power & Light	21%	17%	20%	27%	20%	60%	53%	48%	56%	55%	13%
Easton Utilities-Electric	16%	26%	18%	15%	20%	17%	14%	14%	42%	18%	35%
Easton Utilities-Gas	27%	25%	5%	38%	22%	40%	35%	45%	58%	41%	NA
Elkton Gas Service	**	**	**	**	37%	**	**	**	**	26%	26%
Washington Gas	1%	1%	1%	1%	1%	37%	25%	33%	35%	33%	NA
Hagerstown Municipal Electric	***	***	***	***	***	37%	13%	18%	12%	22%	13%
Mayor & Council - Berlin	**	**	**	**	**	**	**	**	**	**	**
The Potomac Edison Company	41%	28%	31%	42%	35%	1%	1%	0%	0%	1%	14%
Potomac Electric Power Company	74%	73%	70%	73%	73%	0%	0%	0%	0%	0%	20%
Somerset Rural Electric Cooperative	**	**	**	**	**	**	**	**	**	**	**
Southern Maryland Electric Cooperative	71%	62%	65%	69%	67%	76%	70%	67%	69%	72%	31%
TOTALS:	50%	24%	25%	29%	31%	46%	36%	35%	39%	39%	16%

* Customer is in arrears if some monthly billing is past due on March 31, 2008.

** Not Available or not available by poverty level.

*** Operates approved alternate USPP to all MEAP eligible customers.

¹ BGE provides data categorized into 5 poverty levels. The "Overall" column is a weighted average of all 5 poverty levels.

TABLE 7

AVERAGE ARREARAGE FOR USPP PARTICIPANTS, MEAP ELIGIBLE CUSTOMERS, AND NON-MEAP CUSTOMERS IN ARREARS* BY POVERTY LEVEL

UTILITY	USPP Participants (\$)					MEAP Eligible Non-Participants (\$)					Non-MEAP Customers (\$)
	Poverty Level 1	Poverty Level 2	Poverty Level 3	Poverty Level 4	Overall	Poverty Level 1	Poverty Level 2	Poverty Level 3	Poverty Level 4	Overall	
Baltimore Gas & Electric ¹	774.00	2,157.00	2,386.00	2,400.00	1,273.16	906.00	799.00	797.00	774.00	851.25	611.00
Chesapeake Utilities-Cambridge Gas Division	**	**	**	**	**	**	**	**	**	**	**
Chesapeake Utilities-Citizens Gas Division	0.00	0.00	0.00	0.00	0.00	227.00	209.00	203.00	195.00	213.53	166.00
Choptank Electric Cooperative	485.67	365.79	436.24	444.29	435.10	326.00	0.00	443.00	0.00	365.00	152.53
Columbia Gas of Maryland	128.49	172.20	121.45	124.16	136.66	211.81	209.35	191.35	199.19	204.72	180.09
Delmarva Power & Light	553.00	517.00	524.00	551.00	536.57	786.00	740.00	832.00	697.00	775.20	446.00
Easton Utilities-Electric	255.00	229.00	165.00	256.00	218.65	492.00	310.00	378.00	315.00	370.43	303.00
Easton Utilities-Gas	178.00	302.00	225.00	345.00	251.00	196.00	195.00	275.00	212.00	223.09	**
Elkton Gas Service	**	**	**	**	98.00	**	**	**	**	126.00	147.00
Washington Gas	120.99	134.85	103.40	44.69	107.11	299.49	245.45	252.50	216.63	265.29	240.00
Hagerstown Municipal Electric	***	***	***	***	***	767.00	805.00	411.00	493.00	700.00	579.00
Mayor & Council - Berlin	**	**	**	**	**	**	**	**	**	**	**
The Potomac Edison Company	294.00	250.00	297.00	236.00	277.23	195.00	615.00	339.00	746.00	454.14	**
Potomac Electric Power Company	NA	NA	NA	NA	NA	**	**	**	**	**	354.00
Somerset Rural Electric Cooperative	**	**	**	**	**	**	**	**	**	**	**
Southern Maryland Electric Cooperative	575.45	485.05	495.12	520.24	531.20	512.51	466.22	454.66	516.77	488.25	176.18
TOTALS:	400.37	990.07	1,181.03	1,290.44	811.54	543.44	527.33	479.65	521.27	538.64	409.55

* Customer is in arrears if some monthly billing is past due on March 31, 2008.

** Not available or not available by poverty level.

*** Offers an approved alternate USPP to all MEAP eligible customers.

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

UTILITY	Compliance 2010-2011					Compliance 2009-2010				
	Poverty Level 1	Poverty Level 2	Poverty Level 3	Poverty Level 4	Overall	Poverty Level 1	Poverty Level 2	Poverty Level 3	Poverty Level 4	Overall
Baltimore Gas & Electric ¹	***	***	***	***	***	***	***	***	***	***
Chesapeake Utilities-Cambridge Gas Division	76%	79%	74%	89%	77%	40%	59%	41%	58%	46%
Chesapeake Utilities-Citizens Gas Division	55%	73%	86%	80%	68%	42%	61%	69%	56%	53%
Choptank Electric Cooperative	76%	85%	87%	87%	83%	79%	86%	85%	80%	83%
Columbia Gas of Maryland	*	*	*	*	*	*	*	*	*	*
Delmarva Power & Light	74%	82%	77%	77%	78%	79%	85%	81%	80%	81%
Easton Utilities-Electric	36%	46%	65%	54%	50%	29%	54%	63%	36%	49%
Easton Utilities-Gas	62%	30%	58%	50%	51%	14%	40%	33%	0%	26%
Elkton Gas Service	**	**	**	**	96%	**	**	**	**	96%
Washington Gas	95%	92%	91%	82%	92%	94%	90%	89%	81%	90%
Hagerstown Municipal Electric	**	**	**	**	**	**	**	**	**	**
Mayor & Council - Berlin	*	*	*	*	*	*	*	*	*	*
The Potomac Edison Company	99%	99%	99%	98%	99%	99%	98%	99%	100%	99%
Potomac Electric Power Company	54%	58%	52%	46%	53%	62%	67%	68%	67%	65%
Somerset Rural Electric Cooperative	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Southern Maryland Electric Cooperative	97%	98%	97%	97%	97%	98%	99%	97%	99%	98%
TOTALS:	89%	90%	88%	87%	92%	89%	91%	90%	89%	92%

* Not available or not available by poverty level.

** Offers an alternative USPP program to all MEAP eligible customers.

*** BGE does not remove customers from USPP for failure to pay the amount due on two consecutive monthly bills.

¹ BGE provides data categorized into 5 poverty levels. The "Overall" column is a weighted average of all 5 poverty levels.

TABLE 9
NUMBER OF WINTER HEATING SEASON TERMINATIONS

UTILITY	USPP Participants					MEAP Eligible Non-Participants					Non-MEAP Customers
	Poverty Level 1	Poverty Level 2	Poverty Level 3	Poverty Level 4	Total	Poverty Level 1	Poverty Level 2	Poverty Level 3	Poverty Level 4	Total	
Baltimore Gas & Electric ¹	181	57	75	55	443	22	4	1	1	29	3060
Chesapeake Utilities-Cambridge Gas Division	3	1	0	0	4	4	3	4	1	12	39
Chesapeake Utilities-Citizens Gas Division	3	1	0	1	5	37	22	17	9	85	148
Choptank Electric Cooperative	48	38	31	10	127	0	0	0	0	0	NA
Columbia Gas of Maryland	0	0	0	0	0	0	0	0	0	0	100
Delmarva Power & Light	42	22	21	9	94	24	12	13	6	55	773
Easton Utilities-Electric	0	0	0	0	0	0	0	0	0	5	10
Easton Utilities-Gas	0	0	0	0	0	0	0	0	0	0	0
Elkton Gas Service	*	*	*	*	1	*	*	*	*	0	3
Washington Gas	2	1	0	5	8	4	1	0	0	5	41
Hagerstown Municipal Electric	**	**	**	**	**	**	**	**	**	**	67
Mayor & Council - Berlin	0	0	0	0	0	0	0	0	0	0	0
The Potomac Edison Company	0	0	0	0	0	0	0	0	0	0	11
Potomac Electric Power Company	49	32	36	20	137	0	0	0	0	0	513
Somerset Rural Electric Cooperative	0	0	0	0	0	0	0	0	0	0	0
Southern Maryland Electric Cooperative	0	0	0	0	0	0	0	0	0	0	904
TOTALS:	328	152	163	100	819	91	42	35	17	191	5669

* Not available or not available by poverty level.

** Offers an approved alternate USPP to all MEAP eligible customers.

¹ BGE provides data categorized into 5 poverty levels. Therefore the entries shown for the first 4 poverty levels do not sum to the total.

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

UTILITY	Poverty Level				
	Poverty Level 1	Poverty Level 2	Poverty Level 3	Poverty Level 4	Overall
Baltimore Gas & Electric ¹	45%	44%	43%	43%	40%
Chesapeake Utilities-Cambridge Gas Division	*	*	*	*	*
Chesapeake Utilities-Citizens Gas Division	**	**	**	**	**
Choptank Electric Cooperative	8%	6%	5%	8%	7%
Columbia Gas of Maryland	*	*	*	*	*
Delmarva Power & Light	34%	34%	36%	37%	35%
Easton Utilities-Electric	0%	0%	0%	0%	0%
Easton Utilities-Gas	0%	0%	0%	0%	0%
Elkton Gas Service	*	*	*	*	11%
Washington Gas	11%	14%	15%	15%	13%
Hagerstown Municipal Electric	**	**	**	**	**
Mayor & Council - Berlin	***	***	***	***	***
The Potomac Edison Company	92%	95%	95%	89%	93%
Potomac Electric Power Company	52%	56%	55%	61%	55%
Somerset Rural Electric Cooperative	*	*	*	*	*
Southern Maryland Electric Cooperative	14%	5%	13%	15%	12%
TOTALS:	40%	39%	39%	42%	38%

* Not available or not available by poverty level.

** Offers an alternative USPP program to all MEAP eligible customers.

*** Municipality-owned utility with less than 5,000 customers.

¹ BGE provides data categorized into 5 poverty levels. The "Overall" column is a weighted average of all 5 poverty levels

TABLE 11

**PERCENTAGE OF USPP PARTICIPANTS, MEAP ELIGIBLE CUSTOMERS, AND NON-MEAP CUSTOMERS
WHOSE PRIMARY HEAT SOURCE IS PROVIDED BY THE UTILITY BY POVERTY LEVEL**

UTILITY	USPP Participants					MEAP Eligible Non-Participants					Non-MEAP
	Poverty Level 1	Poverty Level 2	Poverty Level 3	Poverty Level 4	Overall	Poverty Level 1	Poverty Level 2	Poverty Level 3	Poverty Level 4	Overall	Customers
Baltimore Gas & Electric ¹	81%	84%	84%	85%	84%	81%	83%	83%	86%	82%	80%
Chesapeake Utilities-Cambridge Gas Division	*	*	*	*	*	*	*	*	*	*	*
Chesapeake Utilities-Citizens Gas Division	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	88%
Choptank Electric Cooperative	46%	41%	40%	40%	42%	*	*	*	*	100%	*
Columbia Gas of Maryland	100%	100%	100%	100%	100%	99%	96%	97%	98%	98%	91%
Delmarva Power & Light	72%	67%	66%	65%	68%	83%	83%	84%	83%	83%	88%
Easton Utilities-Electric	100%	100%	100%	100%	100%	100%	100%	98%	100%	99%	93%
Easton Utilities-Gas	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	0%
Elkton Gas Service	*	*	*	*	99%	*	*	*	*	100%	93%
Washington Gas	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	99%
Hagerstown Municipal Electric	**	**	**	**	**	*	*	*	*	*	*
Mayor & Council - Berlin	***	***	***	***	***	***	***	***	***	***	***
The Potomac Edison Company	100%	100%	100%	100%	100%	98%	99%	99%	98%	99%	94%
Potomac Electric Power Company	49%	58%	55%	66%	55%	0%	0%	0%	0%	0%	97%
Somerset Rural Electric Cooperative	*	*	*	*	*	*	*	*	*	*	*
Southern Maryland Electric Cooperative	87%	91%	88%	95%	89%	NA	NA	NA	NA	NA	NA
TOTALS:	78%	78%	77%	80%	80%	68%	70%	73%	74%	71%	87%

* Not Available or not available by poverty level.

** Offers an approved alternate USPP to all MEAP eligible customers.

*** Municipality owned utility with less than 5,000 customers.

¹ BGE provides data categorized into 5 poverty levels. The "Overall" column is a weighted average of all 5 poverty levels.

TABLE 12
AVERAGE MARYLAND ENERGY ASSISTANCE PROGRAM GRANT² FOR USPP PARTICIPANTS
BY POVERTY LEVEL FOR THE LAST TWO HEATING SEASONS

UTILITY	Average 2010-2011 Grant (\$)					Average 2009-2010 Grant (\$)				
	Poverty Level 1	Poverty Level 2	Poverty Level 3	Poverty Level 4	Overall	Poverty Level 1	Poverty Level 2	Poverty Level 3	Poverty Level 4	Overall
Baltimore Gas & Electric ¹	507.00	420.00	336.00	258.00	410.26	329.00	275.00	234.00	188.00	270.67
Chesapeake Utilities-Cambridge Gas Division	**	**	**	**	**	**	**	**	**	**
Chesapeake Utilities-Citizens Gas Division	313.00	277.00	190.00	158.00	266.70	196.00	203.00	124.00	109.00	174.68
Choptank Electric Cooperative	811.00	660.00	584.00	460.00	663.33	418.00	360.00	358.00	343.00	375.91
Columbia Gas of Maryland	388.42	352.35	273.97	226.60	329.41	305.79	277.75	239.57	155.31	261.84
Delmarva Power & Light	**	**	**	**	575.00	**	**	**	**	287.00
Easton Utilities-Electric	482.00	408.00	446.00	431.00	445.34	234.00	226.00	240.00	211.00	231.75
Easton Utilities-Gas	230.00	245.00	160.00	131.00	205.04	154.00	145.00	151.00	70.00	141.14
Elkton Gas Service	**	**	**	**	123.00	**	**	**	**	94.00
Washington Gas	335.62	344.05	292.42	240.06	316.49	256.07	263.19	248.34	194.87	249.10
Hagerstown Municipal Electric	***	***	***	***	***	***	***	***	***	***
Mayor & Council - Berlin	**	**	**	**	**	**	**	**	**	**
The Potomac Edison Company	396.00	336.00	299.00	261.00	339.53	226.00	194.00	184.00	190.00	203.13
Potomac Electric Power Company	**	**	**	**	605.00	**	**	**	**	339.00
Somerset Rural Electric Cooperative	**	**	**	**	**	**	**	**	**	**
Southern Maryland Electric Cooperative	735.65	538.20	470.87	371.79	592.59	411.57	345.20	358.31	366.34	376.60
TOTALS:	505.85	427.75	351.45	271.81	417.98	323.17	278.50	246.98	200.56	275.85

** Not available or not available by poverty level.

*** Offers an approved alternative USPP to all MEAP eligible customers.

¹ BGE provides data categorized into 5 poverty levels. The "Overall" column is a weighted average of all 5 poverty levels.

² Average grant payable to the utility at the time of customer enrollment plus supplemental awards (if any).