STATE OF MARYLAND

PUBLIC SERVICE COMMISSION

December 4, 2019

The Honorable Thomas V. "Mike" Miller, Jr.
President of the Senate
State House, H-107
Annapolis, Maryland 21401

The Honorable Adrienne A. Jones
Speaker of the House of Delegates
State House, H-101
Annapolis, Maryland 21401

Re: ***Utility Service Protection Program Annual Report for Winter 2018-2019 In Compliance with § 7-307 of the Public Utilities Article, Annotated Code of Maryland (MSAR #9420)***

Dear President Miller and Speaker Jones:

Pursuant to § 7-307 of the Public Utilities Article, *Annotated Code of Maryland*, enclosed is the Public Service Commission's *Utility Service Protection Program Annual Report for Winter 2018-2019*. It has come to the Commission's attention that you did not receive a copy of the *Utility Service Protection Program Annual Report for Winter 2017-2018* that is also enclosed.

By Direction of the Commission,

Andrew S. Johnston
Executive Secretary

ASJ:tlj

Enclosures

cc: Sarah T. Albert, Department of Legislative Services (5 copies)

PUBLIC SERVICE COMMISSION OF MARYLAND

UTILITY SERVICE PROTECTION PROGRAM

ANNUAL REPORT

WINTER 2017-2018

Submitted to the
Maryland General Assembly
Annapolis, Maryland

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

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EXECUTIVE SUMMARY

During the 2017-2018 winter heating season, 34,443 customers participated in the Utility Service Protection Program ("USPP" or "Program"), a customer enrollment decrease of 2,808 or approximately 7.5 percent reduction as compared with the 2016-2017 heating season. USPP participation continued to decrease, a trend which has been observed since the 2011-2012 winter season. In the 2017-2018 winter heating season, the USPP participation number decreased by 50,537 participants as compared with the highest enrollment of 84,826 USPP participants in the 2010-2011 winter season.

The USPP enrollment in the latest winter season represented 69 percent of the 50,259 customers statewide who are certified to receive benefits from the Maryland Energy Assistance Program ("MEAP"), two percentage points higher than the 67 percent observed during the 2016-2017 winter season. This slightly increased enrollment rate as a percentage of MEAP is due to the fact that the number of MEAP-certified residential customers decreased in the 2017-2018 winter season by 5,075 as compared with the 2016-2017 winter season. Table E1 provides each utility's USPP participants, MEAP-certified customers, and USPP enrollment as a percentage of MEAP and total residential customers the utility serves. Of the utilities listed, Baltimore Gas and Electric Company ("BGE") with approximately 89 percent, had the highest USPP enrollment rate among MEAP customers; Delmarva Power & Light Company ("DPL") and Choptank Electric Cooperative, Inc. ("Choptank") had the second and the third highest USPP enrollment rates with 84 percent and 81 percent enrollment rates among their MEAP-certified customers, respectively. Most utilities had at least a 30 percent USPP enrollment.

E 1 2017-2018 USPP PARTICIPATION INFORMATION BY UTILITY

UTILITY	USPP	MEAP Customer	USPP Enrollment as % of MEAP	Total Customer	USPP Enrollment as % of Total Customer
Baltimore Gas and Electric Company	15,558	17,414	89%	1,786,547	0.87%
Chesapeake Utilities - Cambridge Gas Division	8	319	3%	2,447	0.33%
Choptank Electric Cooperative, Inc.	806	998	81%	47,588	1.69%
Columbia Gas of Maryland, Inc.	1,141	2,106	54%	29,771	3.83%
Delmarva Power & Light Company	7,103	8,417	84%	179,103	3.97%
Easton Utilities Commission	115	561	20%	8,288	1.39%
Elkton Gas	65	261	25%	5,746	1.13%
Mayor and Council of Berlin	154	269	57%	2,361	6.52%
Potomac Electric Power Company	2,733	5,120	53%	524,557	0.52%
Southern Maryland Electric Cooperative, Inc.	2,459	5,169	48%	145,651	1.69%
The Potomac Edison Company	1,723	4,053	43%	222,016	0.78%
Washington Gas Light Company	2,578	5,572	46%	465,972	0.55%
TOTAL	**34,443**	**50,259**	**69%**	**3,420,047**	**1.01%**

As seen in the last column of Table E1, the USPP participants accounted for approximately 1.01% of the total customers that the USPP participating utilities serve, slightly lower than the 1.09% observed in the last USPP report. The USPP enrollment rate for each utility ranged from less than one percent to 6.52 percent of the utility's respective total residential customers in the State.

The primary purpose of the USPP is to minimize service terminations of low income customers during the heating season. Table E2 provides the termination number and termination rate of the USPP participants for each utility in the 2017-2018 winter heating season. Compared to the 2016-2017 heating season, the number of USPP participants' services terminated was 1,592, an increase of 269, or 20.3 percent over the preceding heating season. The statewide USPP termination rate was approximately 4.62 percent, an increase from the 3.55 percent termination rate in the previous heating season. The termination rate increase is due to the increase in terminations and the decrease in USPP participants. Table E2 indicates that five major utilities reported terminations: BGE, Choptank, DPL, Potomac Electric Power Company

("Pepco"), and The Potomac Edison Company ("PE"). BGE reported the highest termination rate among the reporting utilities in the 2017-2018 heating season. Six utilities did not report any terminations in the 2017-2018 winter season. Columbia Gas of Maryland, Inc. ("Columbia Gas") and Washington Gas Light Company ("WGL") each have a no-termination policy during the winter heating season. Some small and municipal utilities normally report no terminations, and they work with their customers to avoid termination.

E 2 2017-2018 USPP TERMINATION BY UTILITY

UTILITY	USPP Participants	Terminations	Termination Rate	Change in Terminations from Previous Heating Season
Baltimore Gas & Electric Company	15,558	1,257	8.08%	72
Chesapeake Utilities - Cambridge Gas Division	8	0	0.00%	0
Choptank Electric Cooperative, Inc.	806	65	8.06%	25
Columbia Gas of Maryland, Inc.	1,141	0	0.00%	0
Delmarva Power & Light Company	7,103	163	2.29%	91
Easton Utilities Commission	115	0	0.00%	-3
Elkton Gas	65	0	0.00%	0
Mayor and Council of Berlin	154	0	0.00%	0
Potomac Electric Power Company	2,733	100	3.66%	86
Southern Maryland Electric Cooperative, Inc.	2,459	0	0.00%	0
The Potomac Edison Company	1,723	7	0.41%	-2
Washington Gas Light Company	2,578	0	0.00%	0
TOTAL	**34,443**	**1,592**	**4.62%**	**269**

Table E3 summarizes the number of USPP participants and the terminations for the six most recent winter seasons from 2012-2013 to 2017-2018. The number of USPP participants was downward-trending during this time period, decreasing from 63,389 in the 2012-2013 winter season to 34,443 in the 2017-2018 heating season, a reduction of approximately 46 percent. The number of USPP terminations also showed a downward trend from the 2012-2013 to the 2017-2018 heating season, decreasing from 2,208 in the 2012-2013 heating season to 1,592 in the 2017-2018 heating season, a decrease of 716 or approximately 28 percent from the 2012-2013 winter season although the current reporting season had more terminations than that in the previous season.

E 3 USPP PARTICIPATION AND SERVICE TERMINATION[1]

Reporting Season	USPP Participants	USPP Service Termination	Percentage of USPP Termination
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%

BACKGROUND

On March 1, 1988, the Public Service Commission of Maryland ("Commission") issued Order No. 67999 in Case No. 8091,[2] which established the Utility Service Protection Program, as required by Article 78 §54K, which has since been recodified as Section 7-307 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 winter heating season. Regulations governing the USPP are contained in Section 20.31.05 of the Code of Maryland Regulations ("COMAR").

The USPP is available to utility customers who are eligible and have applied for a 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 heating season, which extends from November 1 to 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, based on the estimated cost of annual service to the

[1] The analyses of 2015-2016 and the 2016-2017 did not include the Poverty Level 5 data submitted by BGE, DPL, and Pepco.
[2] *In the Matter of Regulations Governing Terminations of Gas or Electric Service to Low Income Residential Customers during the Heating Season.*

household. The USPP allows customers in arrears to restore service by accepting a USPP 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 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 20.31.05.03C.

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 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.[3] Utilities serving residential customers in Maryland submitted data for this report. The Commission's May 2018 data request for the 2017-2018 heating season was similar to the

[3] The data request was issued to BGE, Chesapeake Utilities Corporation-Cambridge Gas Division ("CUC-Cambridge"), Chesapeake Utilities Corporation-Citizens Gas Division ("CUC-Citizens"), Chesapeake Utilities Corporation-Sandpiper, Choptank Electric Cooperative, Inc. ("Choptank"), Columbia Gas, DPL, Easton, Elkton Gas Company ("Elkton Gas"), WGL, Hagerstown Municipal Electric Light Plant ("Hagerstown"), Berlin, PE, Pepco, Southern Maryland Electric Cooperative, Inc. ("SMECO"), Thurmont Municipal Light Company ("Thurmont"), UGI Central Penn Gas, Inc. f/k/a PPL Gas Utilities Corporation ("UGI"), and Williamsport Municipal Light Plant ("Williamsport").

previous USPP data requests.[4] This report provides an analysis and summary of that information.

DATA COLLECTION AND ANALYSIS

Eighteen companies submitted 2017-2018 heating season USPP reports to the Commission. Among these companies, four companies did not participate in the USPP: Hagerstown does not participate in the USPP program but implements a Commission-approved alternate program;[5] two small municipal companies, Thurmont and Williamsport, and UGI reported that they did not participate in the USPP.[6] Therefore, these four companies were not included in the analyses contained in this report. Chesapeake Utilities Corporation – Citizens Gas Division did not report any USPP participants this year. Chesapeake Utilities Corporation - Sandpiper Energy did not have any USPP participants for the 2016-2017 winter and reported one participant this current winter season. Therefore, data analysis of this report also did not include these two companies. Mayor and Council of Berlin reported a total number of USPP participants, MEAP-certified non-USPP participants, and non-MEAP participants but did not provide data by poverty levels. Berlin USPP data was only included in the statewide participation but not in the analysis by poverty level. Therefore, the analyses contained in this report includes 11 companies that provided USPP poverty level data. Even so, the data provided to the Commission have variations. Some utilities indicated that the data were not available by poverty level due to accounting system limitations or was unavailable for various other reasons. The data analyses in this report were performed based on the available data of the 11 companies for the 2017-2018 heating season. The basic information for all responding utilities is in Appendix Table A1.

The data in this report provides information on Poverty Levels 1, 2, 3, and 4 grouped by household incomes measured against the federal poverty level ("FPL") as follows:

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[4] The USPP Data Request was expanded in 2007 and several small changes were made this year in the interests of clarity.

[5] 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.

[6] UGI is a Pennsylvania based company that offers limited service in Maryland.

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

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.[7] Poverty Level 5 data is comprised of participants that receive subsidized housing allowances. Because residents of subsidized housing receive an allowance to defray the cost of utilities, these participants receive a separate and lower MEAP benefit than other USPP participants.[8] Staff did not include Poverty Level 5 data as a separate poverty level in this report.

PROGRAM PARTICIPATION

Table 1 shows the number of USPP participants and USPP eligible non-participants for each utility by poverty level in the 2017-2018 heating season.[9] The number of USPP participants was 34,289 with MEAP-certified non-USPP participants of 15,701, resulting in a total number of MEAP-certified customers of 49,990.[10] The number of USPP participants decreased by 2,676, or 7.3 percent; the MEAP-certified non-USPP customers decreased by 2,306, or 13 percent; and the total number of MEAP-certified customers decreased by 4,982 or 9.1 percent when compared to the previous heating season.

[7] DPL and Pepco started reporting Poverty Level 5 as did BGE after those companies merged with Exelon Corporation since the three companies have the same parent company – Exelon.
[8] 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.
[9] The Terms "USPP eligible non-Participant," "MEAP eligible non-Participant," and "MEAP-certified non-USPP participants" are used interchangeably in this report. These persons represent the customers who are certified to receive a MEAP grant and are, therefore, eligible to enroll in USPP but who do not participate in USPP program.
[10] The numbers of USPP participants and the total MEAP customers including Berlin's numbers are shown in Table E1. However, Table 1 which shows participants by poverty level excluded Berlin's numbers. Therefore, the numbers for USPP participants and MEAP customers are different in these two tables as is the case here.

Experience varied by utility during the 2017-2018 heating season. BGE reported the largest reduction among the reporting utilities, followed by PE and SMECO as compared with the previous heating season. DPL reported the largest increase in USPP participants, with an increase of 1,181 over the previous winter season. Altogether, increases and decreases among the utilities resulted in a net decrease of 2,676 USPP participants as compared with the last reporting season. The decreases in USPP participants were observed at all poverty levels and ranged from four to seven percent.

As for the distribution of statewide USPP participants, the eight major utilities (BGE, Choptank, Columbia Gas, DPL, Pepco, SMECO, PE, and WGL) accounted for 99.45 percent of the statewide total USPP participants, slightly increased from the previous 98.76 percent in the 2016-2017 heating season. BGE accounted for the largest number of USPP participants at 45.37 percent of the state's total USPP participants, which is lower than the 50.44 percent reported in the previous heating season.

TABLE 1 NUMBER OF USPP CUSTOMERS AND ELIGIBLE NON-PARTICIPATING CUSTOMERS BY POVERTY LEVEL[11]

UTILITY	USPP Participants					% of Statewide Total	USPP Eligible Non-Participants					Grand Total
	Poverty Level						Poverty Level					
	1	2	3	4	Overall		1	2	3	4	Overall	
Baltimore Gas & Electric	5,585	3,866	4,131	1,976	15,558	45.37%	715	468	455	218	1,856	**17,414**
Chesapeake Utilities – Cambridge Gas Division	3	3	1	1	8	0.02%	122	96	68	25	311	**319**
Choptank Electric Cooperative	228	266	238	74	806	2.35%	61	61	54	16	192	**998**
Columbia Gas of Maryland	371	342	309	119	1,141	3.33%	261	283	327	94	965	**2,106**
Delmarva Power & Light	2,527	2,155	1,769	652	7,103	20.72%	391	416	384	123	1,314	**8,417**
Easton Utilities	36	39	32	8	115	0.34%	93	154	144	55	446	**561**
Elkton Gas	20	20	16	9	65	0.19%	63	61	48	24	196	**261**
Potomac Electric Power Company	1,111	729	637	256	2,733	7.97%	912	634	537	304	2,387	**5,120**
Southern Maryland Electric Cooperative	882	736	593	248	2,459	7.17%	938	796	690	286	2,710	**5,169**
The Potomac Edison Company	566	527	459	171	1,723	5.02%	712	736	666	216	2,330	**4,053**
Washington Gas Light Company	1,038	644	600	296	2,578	7.52%	1,098	782	754	360	2,994	**5,572**
TOTALS	**12,367**	**9,327**	**8,785**	**3,810**	**34,289**	**100.00%**	**5,366**	**4,487**	**4,127**	**1,721**	**15,701**	**49,990**

[11] Berlin data was not included because the municipality did not provide a breakdown of the data by poverty level. The total USPP participants are not the same as statewide USPP total.

Table 2 presents USPP participation as a percentage of the total number of MEAP-certified customers for the 2017-2018 and 2016-2017 heating seasons by company and by poverty level. The statewide USPP participation rate of MEAP-certified customers for the 2017-2018 winter heating season is 68.6 percent, slightly higher than the 67.2 percent observed in 2016-2017. This measure is an indication of MEAP-certified customers who need energy assistance and also need USPP protection in order to spread unpaid balances over the winter season to avoid their services being terminated; in other words, 68.6 percent of MEAP customers need the USPP.

The enrollment rate varied among the utilities. BGE reported the highest enrollment rate among its MEAP-certified customers at 89 percent while CUC-Cambridge reported the lowest enrollment rate at three percent. Statewide, Poverty Levels 1, 2, 3, and 4 were nearly identical at 70, 68, 68, and 69 percent, respectively. If compared to the 2016-2017 winter season's poverty levels, Poverty Levels 2, 3, and 4 were slightly lower while Poverty Level 1 increased by eight percentage points. Five utilities reported enrollment rate decreases ranging from three (WGL) to nine (PE) percentage points. Six utilities experienced USPP enrollment rate increases that ranged from less than one percentage point (DPL) to 16 percentage points (SMECO).

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

UTILITY	2017-2018 Participation					2016-2017 Participation				
	Poverty Level					Poverty Level				
	1	2	3	4	Overall	1	2	3	4	Overall
Baltimore Gas & Electric	89%	89%	90%	90%	**89%**	92%	93%	93%	93%	**93%**
Chesapeake Utilities - Cambridge Gas	2%	3%	1%	4%	**3%**	3%	5%	2%	0%	**3%**
Choptank Electric Cooperative	79%	81%	82%	82%	**81%**	75%	76%	76%	74%	**76%**
Columbia Gas of Maryland, Inc.	59%	55%	49%	56%	**54%**	59%	54%	49%	44%	**53%**
Delmarva Power & Light	87%	84%	82%	84%	**84%**	84%	83%	83%	83%	**84%**
Easton Utilities	28%	20%	18%	13%	**20%**	21%	15%	13%	13%	**16%**
Elkton Gas	24%	25%	25%	27%	**25%**	33%	32%	35%	26%	**33%**
Potomac Electric Power Company	55%	53%	54%	46%	**53%**	63%	62%	59%	59%	**61%**
Southern Maryland Electric Cooperative	48%	48%	46%	46%	**48%**	19%	47%	46%	47%	**31%**
The Potomac Edison Company	44%	42%	41%	44%	**43%**	50%	50%	55%	55%	**52%**
Washington Gas Light Company	49%	45%	44%	45%	**46%**	49%	48%	52%	47%	**49%**
TOTALS	**70%**	**68%**	**68%**	**69%**	**69%**	**62%**	**70%**	**72%**	**71%**	**67%**

Table 3 presents the USPP enrollment compared to the total customers each utility serves. During the 2017-2018 heating season, the rate of USPP participants to total utility customers statewide was one percent and decreased slightly from the previously reported 1.09 percent. Among major utilities, DPL and Columbia Gas reported the highest USPP participation rates at 3.97 percent and 3.83, respectively. BGE, PE, Pepco, WGL, and SMECO had the lowest participation rates, all below one percent.

TABLE 3 USPP PARTICIPANTS AND PERCENTAGE OF ENROLLMENT TO MEAP AND TOTAL CUSTOMERS

UTILITY	USPP	MEAP Customer	USPP Participants as a Percentage of MEAP Customer	Total Customers	USPP Participants as a Percentage of Total Customer
Baltimore Gas & Electric	15,558	17,414	89%	1,786,547	0.87%
Chesapeake Utilities - Cambridge Gas	8	319	3%	2,447	0.33%
Choptank Electric Cooperative	806	998	81%	47,588	1.69%
Columbia Gas of Maryland	1,141	2,106	54%	29,771	3.83%
Delmarva Power & Light	7,103	8,417	84%	179,103	3.97%
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Elkton Gas	65	261	25%	5,746	1.13%
Potomac Electric Power Company	2,733	5,120	53%	524,557	0.52%
Southern Maryland Electric Cooperative	2,459	5,169	48%	145,651	1.69%
The Potomac Edison Company	1,723	4,053	43%	222,016	0.78%
Washington Gas Light Company	2,578	5,572	46%	465,972	0.55%
TOTAL	34,289	49,990	68.6%	3,417,686	1.00%

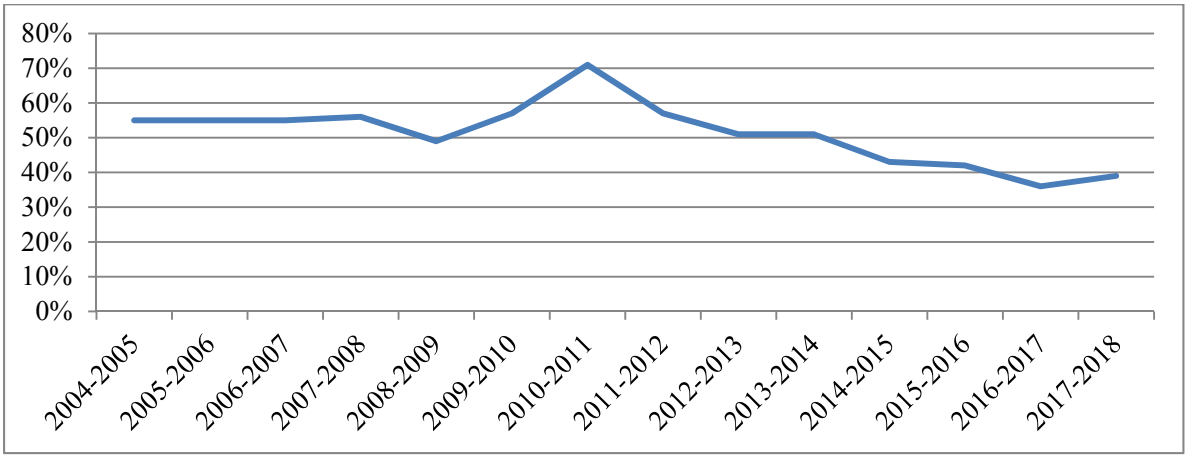
Table 4 shows the percentage of customers who were USPP participants in the 2016-2017 heating season and also participated in the 2017-2018 heating season. Overall, 39 percent of the USPP customers who participated in the 2016-2017 heating season also enrolled in the USPP during the 2017-2018 heating season. This enrollment rate of two-consecutive heating seasons is three percentage points higher than the 36 percent noted in the previous report. Figure 1 illustrates that there has been a declining rate of repeat participants since the 2010-2011 heating season. Based on data availability for the two most recent heating seasons, five utilities (BGE, Elkton Gas, Pepco, SMECO, and WGL) reported higher repeat enrollment for the two

most recent consecutive heating seasons. Choptank, DPL and PE reported lower repeat enrollment for the same two consecutive heating seasons. CUC-Cambridge, Columbia Gas, and Easton had no available data.

TABLE 4 PERCENTAGE OF 2017-2018 USPP PARTICIPANTS WHO ALSO PARTICIPATED IN THE PROGRAM DURING THE PRIOR HEATING SEASON[12]

UTILITY	Poverty Level				
	1	2	3	4	Overall
Baltimore Gas & Electric	37%	46%	44%	39%	41%
Chesapeake Utilities - Cambridge Gas	*	*	*	*	*
Choptank Electric Cooperative	52%	59%	57%	58%	57%
Columbia Gas of Maryland	*	*	*	*	*
Delmarva Power & Light	40%	46%	46%	39%	43%
Easton Utilities	*	*	*	*	*
Elkton Gas	75%	55%	63%	56%	63%
Potomac Electric Power Company	32%	33%	31%	23%	31%
Southern Maryland Electric Cooperative	38%	45%	43%	29%	41%
The Potomac Edison Company	37%	49%	48%	40%	44%
Washington Gas Light Company	27%	32%	33%	26%	30%
TOTALS	**36%**	**43%**	**42%**	**35%**	**39%**

FIGURE 1 RATE OF USPP CUSTOMERS ENROLLED IN TWO-CONSECUTIVE HEATING SEASONS



[12] * indicates either a company is not required to provide data or a company does not track data by poverty level.

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 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 number of customers who were participants in USPP and also made supplemental payments in the 2017-2018 heating season is 3,673 compared to the 6,323 customers in the 2016-2017 heating season. The percentage of USPP participants making supplemental payments was 11 percent, which is six percentage points lower than in the last reporting season. The amount of the average monthly supplemental payment balances during the 2017-2018 heating season statewide was $66.94, which is approximately a $158 decrease from the $225 reported for the 2016-2017 heating season.[13] The average monthly supplemental payment also decreased across all poverty levels for the second consecutive heating season. However, at the end of the 2017-2018 heating season, the average supplemental arrearages statewide were reported as $958, an increase of approximately $147, or 18 percent from $811 in the 2016-2017 heating season.[14] The average of supplemental arrearages increased across all poverty levels ranging from approximately 11 percent to 22 percent.

[13] This is a weighted average calculation for all poverty levels across all utilities weighted by number of USPP participants who make supplemental payment as well.
[14] *Id.*

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[15]

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	Overall	1	2	3	4	Overall	1	2	3	4	Overall
Baltimore Gas & Electric	3%	3%	3%	3%	**3%**	93	87	84	147	**97.02**	632	549	556	907	**632.50**
Chesapeake Utilities - Cambridge Gas Division	33%	0%	0%	0%	**13%**	*	*	*	*	*	*	*	*	*	*
Choptank Electric Cooperative	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*
Columbia Gas of Maryland	71%	61%	56%	50%	**62%**	18.14	19.52	27.27	31.18	**21.88**	253.26	241.67	222.66	214.33	**239.06**
Delmarva Power & Light	17%	14%	15%	21%	**16%**	72	77	91	83	**79.10**	1,719	1,681	2,083	1,683	**1,788.67**
Easton Utilities	3%	*	*	*	1%	*	*	*	*	*	*	*	*	*	*
Elkton Gas	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*
Potomac Electric Power Company	16%	13%	16%	21%	**16%**	71	80	71	81	**74.26**	1,477	1,536	1,294	1,247	**1,417.52**
Southern Maryland Electric Cooperative	22%	20%	33%	38%	**26%**	54.3	54.16	53.55	56.29	**54.33**	485.77	485.03	409.63	439.47	**454.98**
The Potomac Edison Company	18%	12%	9%	15%	**14%**	111	97	105	96	**104.45**	471	370	401	296	**411.67**
Washington Gas Light Company	2%	2%	3%	2%	**2%**	60.86	75.72	62.36	51.43	**63.73**	367.82	371.26	334.68	304.37	**352.35**
TOTALS	**11%**	**10%**	**11%**	**12%**	**11%**	**64.17**	**63.42**	**68.09**	**80.45**	**66.95**	**973.41**	**928.59**	**968.88**	**953.88**	**958.40**

[15] * indicates either a company is not required to provide data or a company does not track data by poverty level.

PARTICIPANT ARREARAGES AND PROGRAM COMPLIANCE

Table 6 presents the percentage of USPP participants, MEAP-certified non-USPP participants, and all other residential customers who were in arrears on their utility bills as of March 31, 2018. 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 2017-2018 winter heating season. Non-MEAP eligible customers exhibited the lowest percentage of customers in arrears during the 2017-2018 winter heating season. For all reporting utilities, the percentage of customers in arrears was 39 percent for USPP participants, 31 percent for MEAP-certified non-USPP participants, and 17 percent for non-MEAP-eligible customers as of March 31, 2018.

TABLE 6 PERCENTAGE OF USPP PARTICIPANTS, MEAP ELIGIBLE CUSTOMERS, AND NON-MEAP CUSTOMERS IN ARREARS BY POVERTY LEVEL[16]

UTILITY	USPP Participants					MEAP Eligible Non-Participants					Non-MEAP Customers
	Poverty Level					Poverty Level					
	1	2	3	4	Overall	1	2	3	4	Overall	
Baltimore Gas & Electric	60%	53%	55%	59%	57%	39%	36%	36%	40%	38%	19%
Chesapeake Utilities - Cambridge Gas Division	0%	0%	0%	0%	0%	53%	45%	40%	36%	46%	25%
Choptank Electric Cooperative	27%	24%	28%	32%	27%	48%	20%	28%	38%	32%	0%
Columbia Gas of Maryland	47%	29%	27%	28%	34%	13%	5%	6%	12%	8%	14%
Delmarva Power & Light	32%	25%	25%	29%	28%	36%	25%	26%	31%	29%	17%
Easton Utilities	25%	23%	25%	13%	23%	8%	4%	8%	15%	7%	3%
Elkton Gas	45%	45%	6%	11%	31%	51%	43%	23%	50%	41%	23%
Potomac Electric Power Company	22%	18%	19%	29%	21%	22%	17%	23%	26%	21%	19%
Southern Maryland Electric Cooperative	49%	41%	42%	47%	45%	54%	47%	45%	51%	49%	22%
The Potomac Edison Company	34%	12%	13%	18%	20%	25%	15%	17%	24%	19%	15%
Washington Gas Light Company	2%	2%	3%	3%	2%	41%	31%	35%	37%	36%	7%
TOTALS	**43%**	**35%**	**38%**	**43%**	**39%**	**36%**	**27%**	**28%**	**34%**	**31%**	**17%**

[16] Customer is in arrears if some monthly billing is past due on March 31, 2018.

Table 7 presents the average dollar amount of arrearages for USPP participants, MEAP-certified non-USPP participants, and non-MEAP customers. Compared to the 2016-2017 data, average arrearage balances for both USPP customers and MEAP-certified non-USPP participants decreased. For the 2017-2018 heating season, the overall average arrearage for USPP participants was $421, decreasing by $201 or about 32 percent from approximately $622 in the 2016-2017 winter season. In 2017-2018, the average arrearage balance for MEAP eligible non-USPP participants was approximately $414, decreasing by $51 or 11 percent from $465 in the 2016-2017 winter heating season. Across all poverty levels, the average arrearage balances decreased from that reported for the previous heating season. Among utilities, DPL and Pepco reported the highest average arrearages with $1,055 and $727, respectively. However, the arrearages for these two companies decreased from $1,467 and $1,038, respectively, in the last winter season.

TABLE 7 ARREARAGE FOR USPP PARTICIPANTS, MEAP-CERTIFIED NON-USPP PARTICIPANTS, AND NON-MEAP CUSTOMERS IN ARREARS BY POVERTY LEVEL[17,18]

UTILITY	USPP Participants ($)					MEAP-Certified Non-USPP Participants ($)					Non-MEAP Customers ($)
	Poverty Level					Poverty Level					
	1	2	3	4	Overall	1	2	3	4	Overall	
Baltimore Gas & Electric	524	462	482	477	486	686	605	472	514	569	291
Chesapeake Utilities - Cambridge Gas	*	*	*	*	*	*	*	*	*	*	*
Choptank Electric Cooperative	387	327	288	273	319	703	689	628	282	576	136
Columbia Gas of Maryland	126	137	126	164	138	209	144	126	165	161	196
Delmarva Power & Light	1,037	1,059	1,015	11,12	1,056	773	973	569	964	820	535
Easton Utilities	*	*	*	*	*	*	*	*	*	*	*
Elkton Gas	240	107	497	251	274	149	110	159	218	159	120
Potomac Electric Power Company	851	1059	483	515	727	563	651	565	648	607	300
Southern Maryland Electric Cooperative	482	296	351	431	390	240	227	235	237	235	151
The Potomac Edison Company	273	166	161	111	178	250	250	196	247	236	205
Washington Gas Light Company	216	237	301	129	221	368	339	359	398	366	143
TOTALS	459	428	411	385	421	438	443	368	408	414	231

[17] Customer is in arrears if any monthly billing is past due on March 31, 2018.
[18] * indicates either a company is not required to provide data or a company does not track data by poverty level.

Table 8 presents the percentage of USPP participants who complied with the payment provisions of the program for the 2017-2018 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 2017-2018 heating season. Because these companies do not enforce this provision of the program, they do not track the percentage of customers who complied with the program rules. Also, for that reason, the statewide compliance percentage of approximately 95 percent shown on Table 8 may overstate the proportion of customers that comply with the USPP payment provisions. The 95 percent compliance rate indicates only approximately five percent of USPP participants were removed from the program. When compared with the previous heating seasons, the statewide compliance rate decreased by approximately one percentage point from a 96 percent compliance rate in the 2016-2017 winter heating season. The compliance rates across all poverty levels were almost identical at 95 percent in 2017-2018.[19] Among the data reported by utilities, SMECO reported a 99 percent compliance rate, followed by WGL with a compliance rate of 97 percent. Major utilities' compliance rates were above 85 percent.

[19] 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 SEASONS[20,21]

UTILITY	Compliance 2017-2018					Compliance 2016-2017				
	Poverty Level					Poverty Level				
	1	2	3	4	Overall	1	2	3	4	Overall
Baltimore Gas & Electric	*	*	*	*	*	*	*	*	*	*
Chesapeake Utilities - Cambridge Gas	0%	100%	100%	100%	63%	25%	100%	100%	*	70%
Choptank Electric Cooperative	79%	89%	88%	89%	86%	85%	92%	96%	96%	91%
Columbia Gas of Maryland	*	*	*	*	*	*	*	*	*	*
Delmarva Power & Light	82%	87%	86%	83%	84%	91%	94%	94%	93%	93%
Easton Utilities	92%	97%	97%	100%	96%	*	*	*	*	*
Elkton Gas	80%	95%	94%	100%	91%	97%	92%	89%	80%	92%
Potomac Electric Power Company	87%	90%	89%	84%	88%	71%	75%	67%	63%	70%
Southern Maryland Electric Cooperative	99%	99%	99%	99%	99%	99%	98%	99%	100%	99%
The Potomac Edison Company	93%	83%	90%	86%	88%	94%	85%	87%	86%	88%
Washington Gas Light Company	97%	97%	97%	99%	97%	100%	100%	100%	100%	100%
TOTALS	**94%**	**95%**	**95%**	**95%**	**95%**	**96%**	**96%**	**96%**	**95%**	**96%**

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 34,289 USPP participants, Maryland's utilities collectively terminated 1,592 USPP participants, higher than the 1,323 terminations reported in the 2016-2017, but lower than the 1,718 terminations in the 2015-2016 winter season. Three major utilities (BGE, DPL, and Pepco) reported 1,520 terminations, accounting for 95 percent of the total terminations. BGE represented 1,257 terminations or approximately 79 percent of the State's

[20] BGE, Columbia Gas of Maryland do not remove customers from USPP for failure to pay the amount due on two consecutive monthly bills.
[21] * indicates data were not available.

total reported USPP terminations in the current report[22]. Two utilities (PE and Easton) reported termination reductions in the current winter heating season.

TABLE 9 NUMBER OF WINTER HEATING SEASON TERMINATIONS[23]

UTILITY	USPP Participants					MEAP-Certified Non-USPP Participants					Non-MEAP Customers
	Poverty Level					Poverty Level					
	1	2	3	4	Overall	1	2	3	4	Overall	
Baltimore Gas & Electric	501	272	306	178	1,257	50	25	31	11	117	9,275
Chesapeake Utilities - Cambridge Gas	0	0	0	0	0	0	0	0	0	0	16
Choptank Electric Cooperative	24	20	14	7	65	0	0	0	0	0	125
Columbia Gas of Maryland	*	*	*	*	*	*	*	*	*	*	58
Delmarva Power & Light	71	36	42	14	163	13	8	6	6	33	1,620
Easton Utilities	0	0	0	0	0	3	0	0	0	3	23
Elkton Gas	0	0	0	0	0	2	0	0	1	3	7
Potomac Electric Power Company	44	28	16	12	100	31	17	17	7	72	2,968
Southern Maryland Electric Cooperative	0	0	0	0	0	0	0	0	0	0	1,504
The Potomac Edison Company	5	1	1	0	7	7	0	1	0	8	129
Washington Gas Light Company	*	*	*	*	*	*	*	*	*	*	0
TOTALS	**645**	**357**	**379**	**211**	**1,592**	**106**	**50**	**55**	**25**	**236**	**15,725**

[22] BGE, DPL, and Pepco reported 459, 9, and 1 customer terminations, respectively, for Poverty Level 5 customers and these terminations were excluded.
[23] * Columbia Gas and Washington Gas each has a no-termination policy during heating season.

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.[24] 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. For the 2017-2018 heating season, approximately 38 percent of USPP participants consumed more than 135 percent of their utilities' system average usage, which was 13 percentage points higher than in 2016-2017. There is not much variation by poverty level which ranges from 36 percent to 41 percent.

TABLE 10 PERCENTAGE OF USPP PARTICIPANTS WHO CONSUMED MORE THAN 135% OF SYSTEM AVERAGE ENERGY DURING 2017-2018 HEATING SEASON[25]

UTILITY	Poverty Level				
	1	2	3	4	Overall
Baltimore Gas & Electric	44%	44%	44%	43%	44%
Chesapeake Utilities - Cambridge Gas Division	*	*	*	*	*
Choptank Electric Cooperative	*	*	*	*	*
Columbia Gas of Maryland	*	*	*	*	*
Delmarva Power & Light	29%	28%	28%	31%	28%
Easton Utilities	*	*	*	*	*
Elkton Gas	15%	10%	13%	33%	15%
Potomac Electric Power Company	29%	27%	29%	35%	29%
Southern Maryland Electric Cooperative	35%	32%	36%	45%	35%
The Potomac Edison Company	48%	45%	47%	53%	47%
Washington Gas Light Company	72%	64%	90%	67%	74%
TOTALS	**39%**	**36%**	**39%**	**41%**	**38%**

[24] The data did not include those customers with high usage who were referred to local weatherization agencies for the Weatherization Assistance Program and also do not include the small utilities serving less than 5,000 customers since they are not required to report this information.

[25] * indicates either a company is not required to provide data or a company does not track usage data by poverty level.

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 2017-2018 heating season, 71 percent of USPP customers, 63 percent of MEAP-certified non-USPP participants, and 50 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 sources decreased three percentage points compared to 74 percent in the previous heating season. The data applicable to the primary heating source vary across utilities. The percentage of USPP customers whose primary heating source was provided by the reporting utilities ranged from 27 percent to 100 percent among utilities. Two gas companies (Columbia Gas and WGL) and one electric company (Choptank) reported that they were the sole heating source for their entire customer base, the same percentages in the last winter season. DPL, an electric-only utility, reported 27 percent, seven percentage points lower than in the 2016-2017 season. Other utilities (BGE, Elkton Gas, Pepco, SMECO, and PE) report between 76 and 95 percent of USPP customers using their utilities as their major heating source.

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	Overall	1	2	3	4	Overall	
Baltimore Gas & Electric	73%	78%	79%	78%	76%	68%	71%	76%	83%	73%	49%
Chesapeake Utilities - Cambridge Gas	*	*	*	*	*	*	*	*	*	*	*
Choptank Electric Cooperative	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	7%
Columbia Gas of Maryland	100%	100%	100%	100%	100%	99%	100%	99%	100%	99%	96%
Delmarva Power & Light	24%	29%	29%	24%	27%	25%	32%	35%	31%	31%	36%
Easton Utilities	*	*	*	*	*	*	*	*	*	*	*
Elkton Gas	90%	95%	100%	100%	95%	92%	93%	92%	92%	92%	100%
Potomac Electric Power Company	78%	80%	78%	71%	78%	79%	83%	79%	85%	81%	31%
Southern Maryland Electric Cooperative	94%	96%	95%	93%	95%	0%	0%	0%	0%	0%	0%
The Potomac Edison Company	87%	86%	82%	85%	85%	86%	84%	80%	80%	83%	47%
Washington Gas Light Company	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
TOTALS	**69%**	**71%**	**72%**	**73%**	**71%**	**63%**	**62%**	**63%**	**66%**	**63%**	**50%**

[26] * Data not applicable since only BGE, DPL, and Pepco provided Poverty Level 5 data; or small utilities are not required to report data; Choptank did not provide data for non-MEAP customers and SMECO did not provide data for non-USPP and non-MEAP participants.

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' arrearage and unpaid balances in order that they may be enrolled into USPP and be eligible for alternate payment plan.[27] OHEP's benefit calculation methodology provides larger MEAP grants at poverty levels reflecting lower incomes. The data indicates that the overall average benefit was $440 in 2017-2018, slightly decreasing from $451 in 2016-2017 and $466 in the 2015-2016 season. As seen in the previous years, the size of the MEAP benefit awarded to customers decreased as the poverty level increased. Customers in Poverty Level 1, at the lowest household income level, received the highest MEAP benefit, an average of $466; those in Poverty Levels 2, 3, and 4, were reported to have received a MEAP grant of $430, $428, and $411, respectively. Customers of Columbia Gas, BGE, and WGL received the largest average grant at $570, $477, and $486, respectively, followed by SMECO and Choptank, with $470 and $459, respectively.

[27] OHEP provides customers' names, classified poverty level information, and MEAP grant to each of these customers to the utilities. Utilities will apply the MEAP grant to offset customer's arrearage/unpaid balance to reduce to $400 or below, and then calculate the rest of unpaid balance into a period of 12, 24, or 36 months alternate/supplemental payment plan according to customer's poverty level.

TABLE 12 AVERAGE MARYLAND ENERGY ASSISTANCE PROGRAM GRANT FOR USPP PARTICIPANTS BY POVERTY LEVEL FOR THE LAST TWO HEATING SEASONS[28]

UTILITY	Average 2017-2018 Grants ($)					Average 2016-2017 Grants ($)				
	Poverty Level					Poverty Level				
	1	2	3	4	Overall	1	2	3	4	Overall
Baltimore Gas & Electric	$519.00	$481.00	$447.00	$417.00	$477.48	$517.00	$478.00	$453.00	$418.00	$478.17
Chesapeake Utilities - Cambridge Gas	*	*	*	*	*	*	*	*	*	*
Choptank Electric Cooperative	$519.00	$449.00	$431.00	$404.00	$459.35	$523.00	$462.00	$453.00	$421.00	$474.41
Columbia Gas of Maryland	$579.91	$559.00	$588.84	$518.64	$569.67	$537.67	$538.38	$522.37	$526.84	$532.73
Delmarva Power & Light	$398.00	$360.00	$368.00	$375.00	$376.89	$421.00	$375.00	$381.00	$393.00	$393.94
Easton Utilities	*	*	*	*	*	*	*	*	*	*
Elkton Gas	$289.00	$301.00	$293.00	$356.00	$302.95	$239.00	$154.00	$282.00	$214.00	$227.29
Potomac Electric Power Company	$386.00	$354.00	$375.00	$377.00	$374.06	$394.00	$371.00	$405.00	$428.00	$393.69
Southern Maryland Electric Cooperative	$468.68	$450.37	$493.45	$473.71	$469.68	$507.08	$518.42	$462.26	$551.03	$503.69
The Potomac Edison Company	$327.00	$300.00	$287.00	$311.00	$306.50	$329.00	$291.00	$299.00	$311.00	$307.18
Washington Gas Light Company	$473.04	$488.29	$520.36	$453.32	$485.60	$482.13	$489.91	$516.59	$511.29	$496.39
TOTALS	**$465.91**	**$430.37**	**$428.25**	**$410.67**	**$440.46**	**$477.53**	**$441.43**	**$433.97**	**$426.40**	**$450.70**

[28] * indicates a company is not required to provide data.

CONCLUSION

The data reported to the Commission from the participating utilities for the 2017-2018 winter heating season show that the total number of USPP participants decreased from the previous heating season. The number of statewide USPP participants was 34,443 during the 2017-2018 heating season, representing 2,808 fewer participants, a 7.5 percent decrease of USPP participants from the 2016-2017 heating season. The number of USPP participants also indicated that 69 percent of MEAP customers enrolled into the USPP, representing a two percentage point increase in the USPP enrollment rate of MEAP customers as compared with the previous 2016-2017 heating season.[29] The USPP enrollment rate was 1.01 percent of the total utility residential customer base, a slight decrease from the 2016-2017's 1.09 percent USPP enrollment rate. Furthermore, 1,592 USPP customers were terminated in the 2017-2018 winter season, which represented 269 more than were terminated in the 2016-2017 winter season. In addition to the winter protections offered by the USPP to low-income customers and the financial assistance to low-income customers from the MEAP and Electric Universal Service Program, some utilities providing electric and/or gas service in Maryland operated other specific programs dedicated to assisting low-income customers during the 2017-2018 heating season. These programs vary from utility to utility, but all focus on helping low-income customers with billing and related issues.

[29] The number of USPP participants here included Berlin's USPP participants since Berlin provided its total USPP participants.

APPENDIX A1 2017-2018 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	No	≥ 5,000	Gas	No
Choptank Electric Cooperative	Yes	≥ 5,000	Electric	Yes
Columbia Gas of Maryland, Inc.	Yes	≥ 5,000	Gas	Yes
Delmarva Power and Light Company	Yes	≥ 5,000	Electric	Yes
Easton Utilities Commission[30]	Yes	≥ 5,000	Gas and Electric	Yes
Elkton Gas Company	Yes	≥ 5,000	Gas	Yes
Hagerstown Light Department	No	≥ 5,000	Electric	No
Mayor & Council of Berlin	Yes	< 5,000	Electric	No
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.	No	< 5,000	Gas	No
Washington Gas Light Company	Yes	≥ 5,000	Gas	Yes
Williamsport Municipal Electric Light Plant	No	< 5,000	Electric	No

[30] Easton Utilities has provided data as a small company although it has more than 5,000 customers.