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OF MARYLAND**

UTILITY SERVICE PROTECTION PROGRAM (USPP)

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EXECUTIVE SUMMARY

The just-completed 2008-2009 winter heating season was colder than normal, which, in conjunction with higher gas and electricity prices, generated much higher utility bills for the State's consumers. Those high utility bills occurred during the same period that consumers were already feeling the financial stress from the national credit crisis and the resulting poorer economic conditions in the State. As a result of all of these factors, the number of customers that were terminated by their gas and electric providers was about twice the level of utility terminations during the previous year. In the face of these dire circumstances, the much larger allocation of public assistance funds from the federal Low Income Home Energy Assistance Program ("LIHEAP") served to contain the level of customer terminations and arrearages.

The data collected for the 2008-2009 winter heating season show that the Utility Service Protection Program ("USPP") continues to accomplish its goal of minimizing the number of service terminations among low-income customers despite increasing numbers of customers participating in the program. Only 1.42% of the USPP population was terminated during the 2008-2009 winter heating season. While that figure is larger than the previous year's termination rate (0.8%), it is small in absolute terms. Overall, the average arrearage for participating customers decreased by 31% from \$578 in 2007-2008 to \$399 in 2008-2009. This decline was made possible by a substantial increase in Maryland Energy Assistance Program ("MEAP") funds provided by the federal LIHEAP program. There were 70,644 USPP participants for the 2008-2009 winter heating season, which is 4.0% more than the 67,916 USPP participants in the 2007-2008 winter heating season, and 91% more than the 37,079 USPP participants in the 1997-1998 winter heating season. The average MEAP grant provided to USPP participants during 2008-2009 was \$294 compared with \$332 in 2007-2008.

The primary purpose of the USPP is to minimize service terminations during the winter, and the 2008-2009 data reported by the participating utility companies indicate that the percentage of terminations among the USPP population was low, although higher

than the prior heating season. The low percentage of terminations indicates that the USPP is effective in keeping low-income customers' service connected during the winter. Results for the 2008-2009 winter heating season reflect the capability of the USPP and the utilities managing the program to provide this benefit to low-income customers.

The data in this USPP report and the USPP report for the previous heating season provide information on Poverty Levels 1, 2, 3 and 4¹ while USPP reports filed previously provided data on Poverty Levels 1, 2, and 3.² These changes are consistent with changes in the poverty levels used by the Department of Human Resources ("DHR") to establish eligibility for grants from MEAP. Comparisons between the 2008-2009 winter heating season and the previous season are consistent while comparisons with previous heating seasons are not consistent due to the change in poverty level definitions.

As was the case last year, Baltimore Gas and Electric Company's ("BGE") data response reported information on USPP participants for a fifth poverty level category, which is not positively identified as one of the abovementioned Poverty Levels, but which could not be excluded from the analysis for the 2008-2009 heating season.³ Data recorded for this additional poverty level category was included in the analysis to be consistent with the data magnitudes in previous reports.⁴ In addition to this characteristic, the BGE data is also unique among the reporting utilities in that it alone combines electric and natural gas customers.

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

² Poverty Levels 1, 2 and 3 previously represented households with incomes measured against the federal poverty levels as follows: 0-50%, <50-100% and <100-150%, respectively.

³ 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 special state funding for approximately two years.

⁴ 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 Poverty Level 1 through Poverty Level 4 data.

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 § 7-307 of the Public Utility Companies Article (“PUC Article”), *Annotated Code of Maryland*. PUC Article §7-307 provides for the promulgation by the Commission of 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 20.31.05 of the Code of Maryland Regulations (“COMAR”).

In response to numerous customer complaints and inquiries related to high energy bills during the most recent heating season, the Commission initiated an investigation into the utilities’ practices in handling customers’ arrearages, requests for payment plans, collection practices and termination policies.⁵ 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. In order to protect residential consumers from having their electric or gas service terminated following the lapse of the winter restrictions provided for in COMAR Section 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.⁶ The temporary moratorium on customer terminations was removed by Commission Order No. 82628 which was issued on April 24, 2009 in Case No. 9175.

⁵ Notice Initiating Proceeding And Notice of Procedural Schedule issued on January 30, 2009 in Case No. 9175: *In the Matter of Arrearage Collection and Termination Practices of Maryland Electric, Gas, or Electric and Gas Utilities*.

⁶ Order No. 82509: Order Temporarily Delaying Terminations of Residential Gas and Electric Service Pending Work Group on the Appropriate Structure of Payment Plans, issued on March 11, 2009 in Case No. 9175.

The USPP is available to utility customers who are eligible and have applied for a grant from the Maryland Energy Assistance Program administered by the Office of Home Energy Programs (“OHEP”) of the Department of Human Resources. 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 down to \$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.

PUC Article §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 customers consuming more than 135% of the system average for the heating season; and 9) the average cost of actual usage for the heating season. This report provides an analysis and summary of that information.

DATA REPORTING

Utilities serving residential customers in Maryland submitted data for this report. The Commission's March 2009 data request contained the same questions as those in the USPP Data Request issued for the 2007-2008 heating season and was similar to all USPP data requests since the 1990-1991 reporting season. The eligible income brackets are separated into four categories: Poverty Level 1; Poverty Level 2; Poverty Level 3; and Poverty Level 4, with Poverty Level 1 being the lowest income bracket. The poverty levels are based on Federal Guidelines. Some of the questions in this year's data request were broken down to include snapshot data (as of March 31, 2009) and cumulative data (for the period November 1, 2008 through March 31, 2009). Some companies were unable to differentiate the responses for this year, and, therefore, did not provide responses for cumulative data. Such occurrences are indicated in the respective tables.

Pursuant to COMAR 20.31.05.01C, Hagerstown Electric Light Plant ("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.

PROGRAM PARTICIPATION

Table 1 shows the number of USPP participants. The data collected show that during the 2008-2009 heating season, there were 70,664 participants in the USPP program. That figure represents the number of MEAP-eligible customers that actually enrolled in the USPP. This represents an increase of 4.0% over that recorded for the 2007-2008 heating season, and an increase of 90.6% compared to the USPP participation in the 1997-1998 winter heating season.

BGE accounted for 40,082 or 56.7% of all the 2008-2009 USPP participants. This represents an increase of 2.9% when compared with the number of USPP participants reported by BGE during the 2007-2008 heating season. Of all utility companies, BGE also had the highest percentage of eligible non-participants for the 2008-2009 heating season, which was 28.5%.

The Potomac Electric Power Company (“Pepco”) enrolled 9,803 customers in the USPP, which was the second highest number enrolled by any utility company. This number represented 13.9% of all USPP 2008-2009 participants, and it was an increase of 10.7% compared with the number enrolled in the 2007-2008 heating season. Delmarva Company (“Delmarva”) had the third highest USPP participation level, with 9,749 customers enrolled for the 2008-2009 winter heating season, representing 13.8% of the total number enrolled by all companies, and an increase of 45.1% compared to the number enrolled in the 2007-2008 heating season. Southern Maryland Electric Cooperative’s (“SMECO”) participation by 987 customers during 2008-2009 is 15.9% higher than its enrollment of 852 customers in 2007-2008.

Washington Gas Light Company–Maryland Division and the Potomac Edison Company d/b/a Allegheny Power (“Potomac Edison”) both recorded large decreases in USPP enrollments from the prior heating season. For the 2008-2009 heating season, Washington Gas Light Company–Maryland Division enrolled 2,835 customers in the USPP, a decrease of 29% from the 2007-2008 level of 3,995. Potomac Edison recorded 2,101 customers enrolled in the USPP during the 2008-2009 heating season which was a decrease of 41% from the 3,584 recorded during the 2007-2008 heating season.

Table 2 presents USPP participation as a percentage of the total number of MEAP-eligible customers for 2008-2009 and 2007-2008. The overall rate of customer participation in the USPP for all utility companies for the 2008-2009 winter heating season was 82%, which is two percentage points lower than the 2007-2008 results, and 7 percentage points lower than the 2006-2007 results. The overall participation rate in 2008-2009 was thirteen percentage points higher compared to the participation rate in the

1997-1998 winter heating season. One hundred percent of eligible Pepco, Choptank Electric Cooperative (“Choptank”), and Somerset Rural Electric Cooperative (“Somerset”) customers participated in the USPP while 98% of eligible Washington Gas Light Company–Maryland Division customers, 90% of eligible BGE customers, and 76% of Delmarva customers participated in the USPP program. There were lower participation rates of eligible customers during the 2008-2009 heating season when compared to the prior heating season among some of the other utilities. Most notable was the 52% participation rate for Potomac Edison in 2008-2009 compared to the 93% participation rate in 2007-2008.

Table 3 shows the percentage of USPP participants in the 2008-2009 heating season who were also enrolled in the program during the 2007-2008 heating season. Overall, there was a seven percentage point decrease in the “consecutive year participation rate.” Forty-nine percent of the USPP participants during the 2008-2009 heating season were also enrolled in the USPP during the 2007-2008 heating season. That figure is down from the 56% of USPP participants that enrolled in both the 2007-2008 and 2006-2007 heating seasons. The highest percentages of consecutive year enrollments were recorded by Pepco (79%) and Washington Gas-Maryland Division (65%). Significant decreases in consecutive year enrollments were recorded by BGE, which was down to 48% compared to 57% last heating season and for Delmarva which was down from 72% last heating season to 41% during the 2008-2009 heating season. Those season-to-season decreases were offset to some extent by the significant increase in the consecutive year enrollment rates of Washington Gas-Maryland Division which increased from 36% the prior season to 65% during 2008-2009.

EQUAL MONTHLY PAYMENTS AND ACTUAL HEATING SEASON USAGE

Table 4 provides a comparison of the average equal monthly billings to actual usage for USPP participants. The average monthly payments are calculated based on the previous year’s actual usage. The actual monthly payments are an average of five billing months, November 2008 – March 2009. For all USPP participants, the average monthly

payment was \$141.60 while the overall average monthly usage for the 2008-2009 heating season was \$257.31. During the 2007-2008 winter heating season, the overall average monthly payment was \$119.94 and the overall average monthly usage was \$128.20. The overall average monthly payment for the 1997-1998 winter heating season was \$85.92, with an overall average actual monthly usage of \$83.84. The differences between the average monthly usage and the average monthly payment amounts represent unpaid utility bill balances and result in arrearages if not covered by the average monthly payment during the spring and summer. As indicated by the data referenced above and as shown in Table 7, utility arrearages have increased significantly during the most recent heating season.

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” which led to those payments. The USPP encourages utilities to offer customers who have outstanding arrearages with the utility 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. While the deferred payment arrangements vary across utilities, all utilities provide for automatic enrollment in supplemental payment plans. Placing outstanding arrearages in such 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 average monthly supplemental payment for Poverty Level 1 as of March 31, 2009 was \$54.16 and the average total supplemental arrearage amount for the same period was \$765.33. Thirty-four percent of Poverty Level 1 USPP recipients for all utilities make supplemental payments, while 30% of Poverty Level 2 customers, 31% of Poverty Level 3 customers, and 38% of Poverty Level 4 customers make supplemental payments. As of March 31, 2009, the average monthly supplemental payment for

Poverty Levels 2, 3 and 4 were \$49.70, \$53.79 and \$53.62, respectively; while the average supplemental arrearage amounts were \$660.85, \$702.11 and \$752.83, respectively.

The percentage of customers making supplemental payments, the average monthly supplemental payment amounts and the average supplemental arrearage for the 2008-2009 heating season were all significantly higher than levels recorded for the prior heating season. Indeed, during the 2008-2009 heating season, approximately double the proportion of customers across all poverty levels made supplemental payments: in 2007-2008, 18% of Poverty Level 1 customers, 17% of Poverty Level 2 customers, 16% of Poverty Level 3 customers and 18% of Poverty Level 4 customers made supplemental payments.

The supplemental payment amounts for each poverty level during the 2008-2009 heating season were approximately 50% higher than their levels during the previous heating season. The average monthly payment for Poverty Level 1 customers was \$54.16 in 2008-2009 (compared to \$34.95 in 2007-2008), and for poverty levels 2 through 4, the respective average monthly supplemental payment amounts were \$49.70 (compared to \$30.62 in 2007-2008), \$53.79 (compared to \$35.93 in 2007-2008) and \$53.62 (compared to \$40.45 in 2007-2008).

Average supplemental arrearage balances during the 2008-2009 heating season were approximately 30% higher for all poverty levels than the comparable amounts that were recorded for the prior heating season. Poverty Level 1 customers had an average supplemental arrearage balance of \$765.33 during 2008-2009 compared to \$561.14 in 2007-2008, while the average supplemental arrearage balances for Poverty Level 2, 3, and 4 participants were \$660.85 in 2008-2009 (compared to \$510.94 in 2007-2008), \$702.11 (compared to \$513.59) and \$752.83 (compared to \$635.23) respectively.

As a comparison, data collected for the 1997-1998 heating season shows that 53% of Poverty Level 1 customers, 41% of Poverty Level 2 customers and 40% of Poverty

Level 3 customers were making supplemental payments. The average monthly amounts of the supplemental payments were \$13.51 for Poverty Level 1 customers, \$16.02 for Poverty Level 2 customers and \$20.38 for Poverty Level 3 customers. The average supplemental arrearages were \$427.16, \$333.45 and \$321.31 for Poverty Levels 1, 2, and 3 respectively.

PARTICIPANT ARREARAGES AND PROGRAM COMPLIANCE

Table 6 presents the percentage of USPP participants, MEAP-eligible non-participants, and all other utility residential customers that were in arrears on their utility bills as of March 31, 2009. In the case of USPP participants, this means that the customer has failed to pay the total amount due on at least one equal monthly billing.

During 2008-2009 USPP participants were less likely to be in arrears to the utility than eligible non-participants, while non-MEAP eligible customers were the least likely to be in arrears on their utility bills. For all utilities, 25% of USPP participants were in arrears while for eligible non-participants, the figure was 35% and that for non-MEAP eligible customers was 18%. In comparison with the 2007-2008 winter heating season, the proportion of USPP participants that were in arrears was significantly lower while the proportion of eligible non-participants remained about the same.

Of the largest utilities, BGE is the only utility that reported significant decreases in the proportion of USPP participants that were in arrears. In 2008-2009, BGE reported that 22% of its USPP participants were in arrears, which is significantly less than the 57% reported for the 2007-2008 heating season. In contrast, Washington Gas (Frederick and Maryland divisions), and Potomac Edison all reported that significantly higher proportions of their respective USPP participants were in arrears when compared to the prior heating season. Specifically, Washington Gas-Frederick Division reported that 31% of its USPP participants were in arrears in 2008-2009 while the comparable figure for the prior heating season was 3%. Similarly, for Washington Gas-Maryland Division, 12% of USPP participants were in arrears in 2008-2009 compared to 3% in 2007-2008. For

Potomac Edison, 30% of USPP participants were in arrears in 2008-2009 compared to 12% in 2007-2008.

Table 7 presents the average dollar amount of arrearages for USPP participants, eligible non-participants, and non-eligible customers currently in arrears. The data for the 2008-2009 heating season indicated that the average arrearage balance among customers with arrearages fell significantly for USPP participants, but rose for both eligible non-participants as well as for non-MEAP customers. The overall average arrearage for USPP participants for the 2008-2009 heating season was \$398.83, which is a decrease of 31% over the 2007-2008 overall arrearage amount of \$578.54. For MEAP-eligible non-participants, the overall average arrearage was \$626.17, which is an increase of 18.5% compared to the 2007-2008 overall arrearage amount of \$528.48. Similarly, the average arrearage level for non-MEAP customers that were in arrears increased by 27.2% from \$318.11 to \$404.52

SMECO recorded the highest overall average arrearage for USPP customers during the 2008-2009 heating season. During that period of time, SMECO's average arrearage balance was \$764.05. The next highest average arrearage balance for USPP customers was recorded by Choptank (\$647.18) followed by Delmarva (\$556.71) and BGE (\$421.10). The highest average arrearage balance for MEAP-eligible non-participants was recorded by BGE (\$955.62) followed by Delmarva (\$789.78) and SMECO (\$686.75). BGE and Delmarva also recorded the highest and second highest average arrearage balance for non-MEAP customers during the 2008-2009 heating season. The average arrearage balances for non MEAP customers was \$634 for BGE and \$439.68 for Delmarva.

Table 8 presents the percentage of USPP participants who complied with the payment provisions of the program for the 2008-2009 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. The most recently available data indicates

that there were no meaningful differences in the compliance percentage for the 2008-2009 heating season and the prior year. The compliance percentage for the 2008-2009 and 2007-2008 heating seasons were 93% and 92%, respectively. Compliance rates for each of the last two heating seasons were measurably higher than the 81% compliance achieved during the 2006-2007 heating season.

As was the case during the prior heating season, the compliance percentage during 2008-2009 did not vary by material amounts across poverty levels. During 2008-2009, the compliance percentage ranged from 89% for Poverty Level 4 participants to 92% for Poverty Level 2 participants. During the previous heating season, the compliance rate ranged from 86% for Poverty Level 4 participants to 91% for Poverty Level 2 participants. Several other features of the compliance rates are worth noting. First, Somerset and Potomac Edison achieved 100% compliance with the USPP payment obligations during the 2008-2009 heating season. Second, as was the case during the previous heating season, BGE reported that it did not remove customers from the program if the customer fell out of the compliance with the USPP payment rules. Because, it does not enforce this provision of the program, BGE reported that it does not track the percentage of customers that complied with the program rules.

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. More than one-half of the utilities for which data is available did not terminate any USPP participants during the 2008-2009 winter heating season. The utilities with no USPP terminations were Columbia Gas of Maryland, Easton Utilities (electric and gas divisions), Washington Gas (Frederick and Maryland Gas divisions), Mayor & Council-Berlin, Potomac Edison, Somerset and SMECO.

During the 2008-2009 winter heating season, 1,003 USPP participants, 230 MEAP eligible non-participants, and 9,419 non-MEAP customers had their service

terminated. During the 2007-2008 heating season, the utility service of 526 USPP participants, 128 MEAP eligible non-participants, and 6,560 non-MEAP customers was terminated. Data from 1997-1998 show that 324 USPP participants, 164 MEAP eligible non-participants, and 7,954 non-MEAP customers had their service terminated during the winter heating season.

Four utilities accounted for 98% of the terminations of USPP participants during the 2008-2009 heating season. Of the total number of USPP terminations, BGE terminated 374 USPP participants (37% of total USPP participant terminations); Pepco terminated 313 USPP participants (representing 31% of the total number of USPP participant terminations); Delmarva terminated 159 USPP participants (16% of the total) and Choptank terminated 133 USPP participants (representing 13% of the total).

Of the total number of USPP participants (70,664), Maryland's utilities collectively terminated 1,003 USPP participants. This is equivalent to 1.4% or approximately one termination for every 70 customers who were enrolled in the USPP program. BGE's termination rate was .9% (0.0093) of its USPP participants. That termination rate is equivalent to one termination for every 107 USPP participants. The termination rate for Pepco was 3.2%, while those for Delmarva and Choptank were 1.6% and 5.5%, respectively.

There were no MEAP eligible non-participant terminations for Choptank, Columbia Gas of Maryland, Easton Utilities–Gas Division, Washington Gas (Frederick and Maryland divisions), Berlin, Potomac Edison, Pepco, Somerset and SMECO. Of the number of each utility's MEAP eligible non-participants, Chesapeake Utilities-Citizens Gas Division terminated 8.2%, Delmarva terminated 4.1%, and BGE terminated 1.0%.

HIGH ENERGY CONSUMPTION

Table 10 presents the percentage of USPP participants who consumed more than 135% of the respective utility's system average use. For the 2008-2009 heating season,

29% of USPP participants consumed more than 135% of the respective utility's system average usage. That figure is down from the 33% reported for the prior heating season. The proportion of USPP customers reporting more than 135% of system average use does not vary much across poverty levels. Consumption exceeding 135% of system average use was reported by 33% of Poverty Level 1 participants, 32% of Poverty Level 2 participants, 33% of Poverty Level 3 participants and 34% of Poverty Level 4 participants. Potomac Edison, Pepco, Delmarva and BGE had the highest overall percentages of USPP customers consuming more than 135% of the system average in 2008-2009.

PRIMARY HEAT SOURCE

Table 11 presents the percentage of USPP participants, eligible non-participants, and non-MEAP customers whose primary heat source is the energy provided by the indicated utility. Overall, for all utilities in 2008-2009, 78% of USPP customers, 62% of eligible non-participants, and 87% 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. The overall 2007-2008 results indicated that 74% of USPP customers and 63% of eligible non-participants receive their primary heat source from the utility. The ten year comparison shows that the primary heat source of 65% of USPP participants, 60% of eligible non-participants and 63% of non-MEAP customers is provided by the utility. Chesapeake Utilities–Citizens Gas Division, Easton Utilities (gas and electric divisions), Elkton Gas Service and Washington Gas (Frederick and Maryland divisions) reported that 100% of both USPP participants and eligible non-participants received their primary heat source from the utility during 2008-2009.

MEAP GRANTS

Table 12 presents the average MEAP grant payable to the utility at the time of customer enrollment. The overall average 2008-2009 MEAP grant for all utilities was \$293.56 compared with \$331.76 in 2007-2008, \$358.73 in 2006-2007 and \$206.33 in

1997-1998. In each of the last two heating seasons, the average monthly level of assistance decreases as the degree of poverty becomes less severe. For example, disaggregating the overall figure of \$293.56 for 2008-2009 by poverty level indicated that the level of assistance declined from \$345.84 for Poverty Level 1 participants to \$194.71 for participants in the Poverty Level 2 category. Viewed from the perspective of specific utilities, the data show that customers of Columbia Gas of Maryland received the highest level of monthly assistance (\$568.98) followed by BGE (\$522.86).

CONCLUSION

The data collected for the winter 2008-2009 winter heating season show that the Utility Service Protection Program continues to accomplish its goal of minimizing the number of service terminations, even though the numbers of customers participating in the program increased. Of the 70,664 USPP participants during the 2008-2009 heating season, 1.42% or 1,003 customers were terminated. The low number of terminations indicates that the USPP is effective in keeping low-income customers' service connected during the winter. In addition, the overall average arrearage for participating customers decreased by 31% from \$578.54 in 2007-2008 to \$398.83 in 2008-2009. During the same period, the average level of arrearage for eligible non-participants rose by 18% from \$528.48 to \$626.17.

In addition to the financial assistance to low income customers from the USPP, MEAP, and EUSP programs, utilities providing electric or gas service in Maryland have other specific programs dedicated to assisting low-income customers. These programs vary from utility to utility, but all are focused on helping low-income customers with billing or other related issues. The survey results of the 2008-2009 heating season reflect the capability of the Utility Service Protection Program, and the utilities managing the program, to benefit low income customers.

TABLE 1

NUMBER OF 2008 - 2009 USPP CUSTOMERS AND ELIGIBLE NON-PARTICIPATING CUSTOMERS BY POVERTY LEVEL⁷

	USPP Participants					Eligible Non-Participants					Overall
	Level 1	Level 2	Level 3	Level 4	Total	Level 1	Level 2	Level 3	Level 4	Total	Total
Baltimore Gas & Electric	8,374	6,004	6,093	2,957	40,082	1,755	875	874	374	4,519	44,601
Chesapeake Utilities-Cambridge Gas Division	26	14	6	3	49	183	90	60	25	358	407
Chesapeake Utilities-Citizens Gas Division	65	48	38	14	165	188	193	134	48	563	728
Choptank Electric Cooperative	751	785	662	222	2,420	*	*	*	*	2	2,422
Columbia Gas of Maryland	431	428	396	157	1,412	262	360	384	172	1,178	2,590
Delmarva Power & Light	3,673	2,820	2,355	901	9,749	1,183	711	864	287	3,045	12,794
Easton Utilities-Electric	78	52	64	19	213	53	86	81	38	258	471
Easton Utilities-Gas	39	33	24	13	109	35	29	20	10	94	203
Elkton Gas Service	*	*	*	*	386	*	*	*	*	144	530
Washington Gas-Frederick Gas Division	89	62	59	22	232	123	71	72	32	298	530
Hagerstown Municipal Electric	**	**	**	**	**	256	342	226	77	901	901
Washington Gas - Maryland Division	1,062	720	726	327	2,835	105	68	53	38	264	3,099
Mayor & Council - Berlin	*	*	*	*	*	*	*	*	*	*	*
Potomac Edison	792	600	516	193	2,101	816	613	486		1,915	4,016
Potomac Electric Power Company	3,672	2,450	2,470	1,211	9,803	0	0	0	0	0	9,803
Somerset Rural Electric Cooperative	37	30	36	18	121	0	0	0	0	0	121
Southern Maryland Electric Cooperative	358	268	274	87	987	969	729	619	215	2,532	3,519
TOTALS:	19,447	14,314	13,719	6,144	70,664	5,928	4,167	3,873	1,316	16,071	86,735

* Not available or not available by poverty level

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

⁷ 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, 2008 - 2009⁸ AND 2007 - 2008

UTILITY	2008 - 2009 Participation					2007 - 2008 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	83%	87%	87%	89%	90%	85%	91%	92%	90%	91%
Chesapeake Utilities-Cambridge Gas Division	12%	13%	9%	11%	12%	43%	26%	29%	35%	36%
Chesapeake Utilities-Citizens Gas Division	26%	20%	22%	23%	23%	38%	16%	24%	34%	28%
Choptank Electric Cooperative	*	*	*	*	100%	100%	100%	100%	100%	100%
Columbia Gas of Maryland	62%	54%	51%	48%	55%	63%	59%	52%	54%	57%
Delmarva Power & Light	76%	80%	73%	76%	76%	75%	79%	77%	75%	77%
Easton Utilities-Electric	60%	38%	44%	33%	45%	35%	36%	46%	44%	34%
Easton Utilities-Gas	53%	53%	55%	57%	54%	40%	36%	44%	67%	42%
Elkton Gas Service	*	*	*	*	73%	*	*	*	*	66%
Washington Gas-Frederick Gas Division	42%	47%	45%	41%	44%	59%	57%	53%	61%	57%
Hagerstown Municipal Electric	**	**	**	**	**	**	**	**	**	**
Washington Gas - Maryland Division	91%	91%	93%	90%	91%	77%	72%	75%	70%	75%
Mayor & Council - Berlin	*	*	*	*	*	50%	31%	45%	43%	42%
Potomac Edison	49%	49%	51%	100%	52%	92%	93%	93%	0%	93%
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	27%	27%	31%	29%	28%	27%	29%	30%	41%	30%
TOTALS:	77%	77%	78%	82%	81%	84%	86%	87%	82%	84%

* Not available or not available by poverty level

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

⁸ BGE provides data categorized into 5 poverty levels. The "Overall" column is a weighted average of all 5 poverty levels.

TABLE 3
PERCENTAGE OF 2008 - 2009 USPP PARTICIPANTS WHO ALSO PARTICIPATED IN
THE PROGRAM DURING THE 2007-2008 HEATING SEASON⁹

UTILITY	Poverty Level				
	Poverty Level 1	Poverty Level 2	Poverty Level 3	Poverty Level 4	Overall
Baltimore Gas & Electric	39%	49%	44%	38%	48%
Chesapeake Utilities-Cambridge Gas Division	*	*	*	*	*
Chesapeake Utilities-Citizens Gas Division	28%	23%	16%	21%	23%
Choptank Electric Cooperative	35%	36%	31%	33%	34%
Columbia Gas of Maryland	*	*	*	*	*
Delmarva Power & Light	38%	47%	41%	30%	41%
Easton Utilities-Electric	53%	44%	48%	42%	48%
Easton Utilities-Gas	23%	58%	29%	31%	36%
Elkton Gas Service	0%	0%	0%	0%	0%
Washington Gas-Frederick Gas Division	18%	42%	22%	23%	26%
Hagerstown Municipal Electric	**	**	**	**	**
Washington Gas - Maryland Division	65%	79%	58%	54%	65%
Mayor & Council - Berlin	***	***	***	***	***
Potomac Edison	40%	40%	40%	40%	40%
Potomac Electric Power Company	74%	90%	84%	66%	79%
Somerset Rural Electric Cooperative	*	*	*	*	*
Southern Maryland Electric Cooperative	15%	19%	14%	26%	17%
TOTALS:	45%	54%	49%	0%	49%

* 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

⁹ 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 PAYMENTS AND AVERAGE ACTUAL MONTHLY HEATING SEASON USAGE
FOR 2008 - 2009 USPP PARTICIPANTS BY POVERTY LEVEL¹⁰**

UTILITY	Average Monthly Payments (\$)					Average Actual Monthly Usage (\$)*				
	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	154.00	154.00	147.00	192.00	156.98	322.71	316.14	309.18	320.93	318.01
Chesapeake Utilities-Cambridge Gas Division	**	**	**	**	**	**	**	**	**	**
Chesapeake Utilities-Citizens Gas Division	96.00	101.00	96.00	119.00	99.41	209.20	193.00	197.40	189.00	199.12
Choptank Electric Cooperative	112.00	98.00	117.00	163.00	113.50	0.00	0.00	0.00	0.00	172.53
Columbia Gas of Maryland	66.84	72.16	78.25	89.17	74.14	186.79	172.76	184.33	189.95	182.16
Delmarva Power & Light	153.52	140.12	151.80	168.21	150.59	204.57	188.73	200.38	215.52	200.71
Easton Utilities-Electric	269.00	175.00	135.00	294.00	208.02	98.00	147.00	119.00	202.00	136.24
Easton Utilities-Gas	150.00	164.00	225.00	270.00	185.06	185.00	220.00	302.00	378.00	241.22
Elkton Gas Service	**	**	**	**	61.00	**	**	**	**	0.00
Washington Gas-Frederick Gas Division	76.00	75.00	75.00	74.00	75.29	135.40	141.80	139.00	131.40	137.37
Hagerstown Municipal Electric	***	***	***	***	***	***	***	***	***	***
Washington Gas - Maryland Division	86.37	82.94	97.85	105.26	90.62	164.12	155.61	166.49	177.57	164.34
Mayor & Council - Berlin	****	****	****	****	****	****	****	****	****	****
Potomac Edison	144.00	125.00	137.00	141.00	136.58	92.20	81.40	87.00	93.60	87.42
Potomac Electric Power Company	96.00	92.00	111.00	134.00	103.47	179.00	214.00	191.00	196.00	195.00
Somerset Rural Electric Cooperative	**	**	**	**	**	**	**	**	**	**
Southern Maryland Electric Cooperative	186.40	191.63	187.83	199.14	189.34	124.17	120.76	124.32	126.40	123.41
TOTALS:	135.30	130.16	134.93	166.52	141.60	232.62	227.38	228.22	246.06	257.29

* Average monthly usage for five billing months of Nov.-March

** 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

¹⁰ BGE provides data categorized into 5 poverty levels. Therefore the entries shown for the first 4 poverty levels do not sum to the total.

BGE data includes data for both gas and electric.

TABLE 5

PERCENTAGE OF 2008-2009 USPP CUSTOMERS MAKING SUPPLEMENTAL PAYMENTS*, THE AVERAGE DOLLAR AMOUNT OF THOSE PAYMENTS, AND THE AVERAGE ARREARAGE REQUIRING PAYMENTS BY POVERTY LEVEL¹¹

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	31%	27%	28%	35%	82.00	76.00	78.00	76.00	1072.00	992.00	1010.00	1025.00
Chesapeake Utilities-Cambridge Gas Division	4%	21%	33%	33%	**	**	**	**	**	**	**	**
Chesapeake Utilities-Citizens Gas Division	15%	17%	8%	21%	52.00	43.00	54.00	67.00	291.00	248.00	251.00	400.00
Choptank Electric Cooperative	**	**	**	**	**	**	**	**	**	**	**	**
Columbia Gas of Maryland	68%	52%	49%	59%	28.70	27.69	29.17	31.34	297.58	293.63	274.99	286.58
Delmarva Power & Light	50%	42%	44%	59%	10.69	11.05	14.34	15.68	577.84	512.95	547.94	602.24
Easton Utilities-Electric	55%	62%	67%	47%	133.00	179.00	128.00	237.00	277.00	302.00	267.00	298.00
Easton Utilities-Gas	54%	55%	88%	54%	121.00	141.00	156.00	262.00	234.00	274.00	202.00	172.00
Elkton Gas Service	**	**	**	**	**	**	**	**	**	**	**	**
Washington Gas-Frederick Gas Division	11%	10%	14%	18%	25.00	16.00	17.00	12.00	301.00	188.00	210.00	150.00
Hagerstown Municipal Electric	***	***	***	***	***	***	***	***	***	***	***	***
Washington Gas - Maryland Division	2%	2%	2%	5%	133.82	114.68	95.84	90.26	532.45	414.85	384.87	393.62
Mayor & Council - Berlin	**	**	**	**	**	**	**	**	**	**	**	**
Potomac Edison	44%	62%	64%	72%	55.00	51.00	43.00	41.00	156.00	89.00	69.00	66.00
Potomac Electric Power Company	34%	32%	33%	36%	61.00	50.00	56.00	49.00	748.00	626.00	682.00	682.00
Somerset Rural Electric Cooperative	**	**	**	**	**	**	**	**	**	**	**	**
Southern Maryland Electric Cooperative	47%	41%	43%	45%	58.65	60.19	60.41	41.68	574.42	588.21	604.29	430.37
TOTALS:	34%	30%	31%	38%	54.16	49.70	53.79	53.62	765.33	660.85	702.11	752.83

* Under COMAR 20.31.01.08

** Not available or not available by poverty level

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

¹¹ BGE provides data categorized into 5 poverty levels. The "Overall" column is a weighted average of all 5 poverty levels.

TABLE 6

**PERCENTAGE OF 2008 - 2009 USPP PARTICIPANTS, MEAP ELIGIBLE CUSTOMERS AND NON-MEAP CUSTOMERS IN ARREARS*
BY POVERTY LEVEL¹²**

UTILITY	USPP Participants					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	47%	7%	39%	7%	22%	48%	46%	47%	54%	41%	18%
Chesapeake Utilities-Cambridge Gas Division	15%	14%	0%	33%	14%	55%	41%	47%	48%	50%	27%
Chesapeake Utilities-Citizens Gas Division	2%	4%	0%	7%	2%	55%	47%	45%	50%	49%	20%
Choptank Electric Cooperative	7%	7%	6%	14%	7%	0%	0%	0%	0%	50%	14%
Columbia Gas of Maryland	36%	21%	17%	17%	24%	19%	13%	11%	17%	14%	19%
Delmarva Power & Light	33%	27%	29%	41%	31%	58%	46%	50%	58%	53%	15%
Easton Utilities-Electric	0%	12%	3%	0%	4%	26%	15%	7%	13%	15%	30%
Easton Utilities-Gas	0%	3%	0%	0%	1%	14%	38%	10%	20%	21%	NA
Elkton Gas Service	**	**	**	**	49%	**	**	**	**	33%	28%
Washington Gas-Frederick Gas Division	37%	34%	20%	32%	31%	48%	42%	44%	44%	45%	NA
Hagerstown Municipal Electric	***	***	***	***	***	30%	15%	16%	19%	20%	18%
Washington Gas - Maryland Division	11%	14%	12%	13%	12%	114%	65%	113%	89%	98%	10%
Mayor & Council - Berlin	**	**	**	**	**	**	**	**	**	**	**
Potomac Edison	38%	24%	24%	33%	30%	1%	1%	1%	0%	1%	14%
Potomac Electric Power Company	35%	32%	33%	34%	34%	0%	0%	0%	0%	0%	24%
Somerset Rural Electric Cooperative	**	**	**	**	**	**	**	**	**	**	18%
Southern Maryland Electric Cooperative	56%	45%	51%	48%	51%	31%	29%	24%	33%	29%	37%
TOTALS:	38%	18%	32%	20%	25%	40%	30%	33%	44%	34%	18%

* 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

¹² 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 2008 - 2009 USPP PARTICIPANTS, MEAP ELIGIBLE CUSTOMERS AND NON-MEAP
CUSTOMERS IN ARREARS* BY POVERTY LEVEL ¹³

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	587.00	123.00	555.00	151.00	421.10	1,051.00	884.00	878.00	855.00	955.62	634.00
Chesapeake Utilities-Cambridge Gas Division	**	**	**	**	**	**	**	**	**	**	**
Chesapeake Utilities-Citizens Gas Division	80.00	86.00	0.00	165.00	104.25	247.00	199.00	240.00	255.00	230.64	215.60
Choptank Electric Cooperative	703.00	685.00	588.00	567.00	647.18	0.00	0.00	0.00	0.00	0.00	253.34
Columbia Gas of Maryland	250.14	179.20	202.90	328.99	227.95	186.47	234.43	160.24	207.73	196.27	253.34
Delmarva Power & Light	584.45	516.01	541.07	579.09	556.71	770.39	858.97	755.70	822.52	789.78	439.68
Easton Utilities-Electric	0.00	176.00	332.00	0.00	215.00	414.00	318.00	322.00	387.00	363.08	309.00
Easton Utilities-Gas	0.00	225.00	0.00	0.00	225.00	173.00	192.00	215.00	313.00	201.65	**
Elkton Gas Service	**	**	**	107.00	**	**	**	**	182.00	**	160.00
Washington Gas-Frederick Gas Division	258.00	193.00	207.00	168.00	222.29	286.00	159.00	268.00	314.00	256.41	87.00
Hagerstown Municipal Electric	***	***	***	***	***	373.00	412.00	472.00	332.00	400.68	370.00
Washington Gas - Maryland Division	83.91	80.01	95.56	116.22	89.83	281.99	340.25	448.42	334.88	337.60	257.75
Mayor & Council - Berlin	**	**	**	**	**	**	**	**	**	**	**
Potomac Edison	247.00	222.00	245.00	189.00	235.28	337.00	128.00	553.00	261.00	283.55	**
Potomac Electric Power Company	237.00	224.00	248.00	260.00	239.39	**	**	**	**	**	303.00
Somerset Rural Electric Cooperative	**	**	**	**	**	**	**	**	**	**	**
Southern Maryland Electric Cooperative	784.91	738.75	766.44	729.01	764.05	796.64	571.70	632.92	667.95	686.76	232.10
TOTALS:	471.13	263.96	450.27	261.16	398.83	689.33	530.48	607.96	618.23	622.58	404.52

* 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

¹³ 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 8
PERCENTAGE OF USPP PARTICIPANTS WHO COMPLIED WITH PROGRAM PAYMENT PROVISIONS 2008 - 2009 and 2007 - 2008
BY POVERTY LEVEL¹⁴

UTILITY	Compliance 2008-2009					Compliance 2007-2008				
	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	***	***	***	***	***	***	***	***	***	***
Chesapeake Utilities-Cambridge Gas Division	54%	36%	83%	33%	51%	39%	50%	33%	67%	44%
Chesapeake Utilities-Citizens Gas Division	58%	54%	42%	71%	55%	56%	67%	65%	43%	64%
Choptank Electric Cooperative	84%	90%	89%	83%	87%	81%	87%	91%	86%	86%
Columbia Gas of Maryland	*	*	*	*	*	*	*	*	*	*
Delmarva Power & Light	82%	86%	83%	79%	83%	68%	79%	75%	66%	76%
Easton Utilities-Electric	55%	62%	67%	47%	60%	83%	75%	95%	79%	83%
Easton Utilities-Gas	54%	55%	88%	54%	61%	0%	80%	73%	100%	79%
Elkton Gas Service	**	**	**	**	92%	**	**	**	**	93%
Washington Gas-Frederick Gas Division	72%	82%	85%	59%	77%	57%	59%	67%	71%	63%
Hagerstown Municipal Electric	**	**	**	**	**	**	**	**	**	**
Washington Gas - Maryland Division	90%	86%	88%	76%	87%	90%	88%	90%	83%	91%
Mayor & Council - Berlin	*	*	*	*	*	*	*	*	*	*
Potomac Edison	100%	100%	100%	100%	100%	94%	97%	96%	*	96%
Potomac Electric Power Company	74%	81%	77%	71%	76%	68%	76%	69%	62%	69%
Somerset Rural Electric Cooperative	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Southern Maryland Electric Cooperative	97%	98%	96%	99%	97%	99%	99%	98%	95%	98%
TOTALS:	90%	92%	91%	89%	93%	87%	91%	90%	86%	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

¹⁴ BGE provides data categorized into 5 poverty levels. The "Overall" column is a weighted average of all 5 poverty levels.

TABLE 9
NUMBER OF 2008 - 2009 WINTER HEATING SEASON TERMINATIONS¹⁵

UTILITY	USPP Participants					MEAP Eligible Non-Participants					Non-MEAP
	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	Customers
Baltimore Gas & Electric	140	55	73	43	374	19	8	10	6	45	3634
Chesapeake Utilities-Cambridge Gas Division	1	0	0	0	1	8	1	1	0	10	37
Chesapeake Utilities-Citizens Gas Division	7	5	4	3	19	16	16	12	2	46	171
Choptank Electric Cooperative	47	35	41	10	133	0	0	0	0	0	71
Columbia Gas of Maryland	0	0	0	0	0	0	0	0	0	0	24
Delmarva Power & Light	79	36	26	18	159	62	20	36	6	124	1135
Easton Utilities-Electric	0	0	0	0	0	1	2	0	0	3	7
Easton Utilities-Gas	0	0	0	0	0	0	0	0	0	0	0
Elkton Gas Service	*	*	*	*	4	*	*	*	*	1	40
Washington Gas-Frederick Gas Division	0	0	0	0	0	0	0	0	0	0	0
Hagerstown Municipal Electric	**	**	**	**	**	**	**	**	**	**	12
Washington Gas - Maryland Division	0	0	0	0	0	0	0	0	0	0	0
Mayor & Council - Berlin	0	0	0	0	0	0	0	0	0	0	0
Potomac Edison	0	0	0	0	0	0	0	0	0	0	183
Potomac Electric Power Company	139	59	69	46	313	0	0	0	0	0	3622
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	483
TOTALS:	413	190	213	120	1003	106	47	59	14	230	9419

* Not available or not available by poverty level

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

¹⁵ 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 FOR NOVEMBER 2008 - MARCH 2009¹⁶

UTILITY	Poverty Level				
	Poverty Level 1	Poverty Level 2	Poverty Level 3	Poverty Level 4	Overall
Baltimore Gas & Electric	40%	40%	38%	37%	30%
Chesapeake Utilities-Cambridge Gas Division	*	*	*	*	*
Chesapeake Utilities-Citizens Gas Division	26%	38%	24%	21%	28%
Choptank Electric Cooperative	7%	6%	6%	9%	7%
Columbia Gas of Maryland	*	*	*	*	*
Delmarva Power & Light	34%	30%	35%	38%	33%
Easton Utilities-Electric	0%	0%	0%	0%	0%
Easton Utilities-Gas	0%	0%	0%	0%	0%
Elkton Gas Service	*	*	*	*	17%
Washington Gas-Frederick Gas Division	21%	18%	17%	12%	18%
Hagerstown Municipal Electric	**	**	**	**	**
Washington Gas - Maryland Division	2%	3%	2%	7%	3%
Mayor & Council - Berlin	***	***	***	***	***
Potomac Edison	76%	86%	85%	79%	81%
Potomac Electric Power Company	32%	30%	35%	37%	33%
Somerset Rural Electric Cooperative	*	*	*	*	*
Southern Maryland Electric Cooperative	4%	2%	4%	2%	3%
TOTALS:	33%	32%	33%	34%	29%

* 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

¹⁶ BGE provides data categorized into 5 poverty levels. The "Overall" column is a weighted average of all 5 poverty levels.

TABLE 11
PERCENTAGE OF 2008 - 2009 USPP PARTICIPANTS, MEAP ELIGIBLE CUSTOMERS, AND NON-MEAP CUSTOMERS WHOSE
PRIMARY HEAT SOURCE IS PROVIDED BY THE UTILITY BY POVERTY LEVEL¹⁷

UTILITY	USPP Participants					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	96%	93%	95%	95%	91%	79%	77%	79%	81%	79%	79%
Chesapeake Utilities-Cambridge Gas Division	*	*	*	*	*	*	*	*	*	*	*
Chesapeake Utilities-Citizens Gas Division	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	91%
Choptank Electric Cooperative	44%	40%	38%	43%	41%	*	*	*	*	100%	*
Columbia Gas of Maryland	100%	100%	100%	100%	100%	42%	40%	49%	40%	43%	93%
Delmarva Power & Light	55%	56%	55%	53%	55%	89%	90%	89%	84%	89%	90%
Easton Utilities-Electric	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	94%
Easton Utilities-Gas	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	94%
Elkton Gas Service	*	*	*	*	100%	*	*	*	*	100%	90%
Washington Gas-Frederick Gas Division	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	98%
Hagerstown Municipal Electric	**	**	**	**	**	*	*	*	*	*	*
Washington Gas - Maryland Division	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	99%
Mayor & Council - Berlin	***	***	***	***	***	***	***	***	***	***	***
Potomac Edison	100%	100%	100%	3%	100%	72%	85%	84%	0%	79%	96%
Potomac Electric Power Company	36%	40%	38%	33%	37%	0%	0%	0%	0%	0%	97%
Somerset Rural Electric Cooperative	*	*	*	*	*	*	*	*	*	*	*
Southern Maryland Electric Cooperative	80%	83%	81%	86%	82%	0%	0%	0%	0%	0%	0%
TOTALS:	75%	75%	76%	0%	78%	61%	58%	62%	59%	62%	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

¹⁷ 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 GRANT* FOR 2008-2009¹⁸ AND 2007-2008 USPP PARTICIPANTS BY POVERTY LEVEL

UTILITY	Average 2008-2009 Grant (\$)					Average 2007-2008 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	646.00	539.00	442.00	308.00	522.86	543.00	443.00	347.00	300.00	366.28
Chesapeake Utilities-Cambridge Gas Division	**	**	**	**	**	**	**	**	**	**
Chesapeake Utilities-Citizens Gas Division	480.00	412.00	337.00	208.00	404.21	362.00	350.00	237.00	234.00	322.57
Choptank Electric Cooperative	331.00	298.00	301.00	275.00	306.95	329.00	304.00	286.00	289.00	306.41
Columbia Gas of Maryland	658.45	618.98	507.46	342.20	568.98	513.83	440.35	370.87	321.44	427.59
Delmarva Power & Light	**	**	**	**	281.00	**	**	**	**	266.00
Easton Utilities-Electric	176.00	168.00	142.00	161.00	162.49	235.00	266.00	211.00	260.15	180.21
Easton Utilities-Gas	362.00	318.00	309.00	203.00	318.05	327.00	208.00	190.00	158.00	231.99
Elkton Gas Service	**	**	**	**	251.00	**	**	**	**	258.25
Washington Gas-Frederick Gas Division	293.00	303.00	289.00	201.00	285.93	242.00	243.00	234.00	217.00	238.32
Hagerstown Municipal Electric	***	***	***	***	***	***	***	***	***	***
Washington Gas - Maryland Division	425.77	386.06	404.03	324.69	398.46	389.71	378.46	353.87	326.14	371.11
Mayor & Council - Berlin	**	**	**	**	**	**	**	**	**	**
Potomac Edison	191.00	155.00	167.00	163.00	172.25	162.00	143.00	156.00	***	154.60
Potomac Electric Power Company	*	*	*	*	320.00	*	*	*	*	300.00
Somerset Rural Electric Cooperative	**	**	**	**	**	**	**	**	**	**
Southern Maryland Electric Cooperative	265.34	264.30	242.60	231.00	255.72	345.91	225.41	266.76	254.93	280.64
TOTALS:	345.84	295.84	261.36	194.71	293.56	318.87	264.34	232.00	208.57	331.76

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

** Not available or not available by poverty level

*** Offers and approved alternative USPP to all MEAP eligible customers

¹⁸ BGE provides data categorized into 5 poverty levels. Therefore the entries shown for the first 4 poverty levels do not sum to the total.