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PUBLIC SERVICE COMMISSION

December 30, 2025

Investigation of Baltimore Gas and Electric * Case No. 9850
Company’s Customer Call Center *
Inaccessibility *
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Re: In the Matter of Baltimore Gas and Electric Company’s Customer Call Center Inaccessibility—Case No. 9850

To: Baltimore Gas and Electric Company

On December 11, 2025,¹ the Commission issued a Notice for Baltimore Gas and Electric Company (“BGE” or the “Company”) to appear in response to persistent and significant complaints regarding the accessibility of its customer service call center. Following a hearing held on December 17, 2025, and upon consideration of the presentations by the Commission’s Consumer Affairs Division (“CAD”), BGE, the Office of People’s Counsel (“OPC”), and Commission Technical Staff (“Staff”), the Commission issues this Letter Order directing further action.

BACKGROUND

Between July and mid-November 2025, CAD documented over 650 customer complaints against BGE. At least 140 of these complaints specifically detailed deficiencies, even systemic failure, in BGE’s call center accessibility, including: (1) customers remaining on hold for several hours or being disconnected entirely; (2) failure of the “callback” system, where customers requested a callback but never received one; (3) multiple, unsuccessful attempts over several

¹ Maillog No. 325209.

weeks to reach call center representatives by phone; (4) removal of the option to remain on hold during high-call volume periods, forcing customers into the automated callback system; and (5) inoperability of BGE's customer self-service website and mobile application.

At the December 17 hearing, CAD summarized the surge in BGE complaints, primarily driven by customers' inability to reach the call center regarding billing charges and service terminations.² CAD observed this issue appears to be unique to BGE, as other Maryland utility customers have not complained of inaccessibility during this period. BGE admitted its call center inaccessibility is a significant problem. While the Company explained that call volume only increased by 0.2 percent year-over-year, the complexity of calls has risen, leading to longer handling and wait times, and longer queues. The Company acknowledged the strain that this places on its customers.

To address these challenges, the Company proposed a three-fold strategy focused on increased staffing, technological improvements, and expanded customer self-service. By hiring additional full-time employees and contractors, BGE aims to bolster its customer operations to better handle call volumes. Simultaneously, the Company is working to improve its callback tool to ensure more reliable callbacks while also leveraging digital resources to help customers resolve issues themselves. According to BGE, increasing customer self-service should reduce overall demand for the call center.

OPC confirmed the rise in customer calls regarding BGE's call center inaccessibility and excessive wait times. Following BGE's initial response to the Commission's information requests ("BGE Initial Response"), OPC issued a letter to BGE on December 11, 2025, seeking additional data and to clarify customer callback times and wait times. OPC requested that the Commission direct BGE to respond to the December 11 letter and submit a formal Corrective Action Plan ("CAP").³

Staff advised at the hearing that it is reviewing BGE's Initial Response but supports OPC's request for a CAP.

At the conclusion of the hearing, the Commission authorized BGE to proceed with its proposed solutions, subject to additional direction as provided in this Order.

² Service terminations include customers facing potential service shut-offs or seeking to restore utility service. As CAD noted, the Commission has received over 14,000 service termination affidavits from BGE since November 1, 2025, despite seasonal protections aimed at preventing service termination for nonpayment during the winter months.

³ OPC also called for a review of BGE's 2024 annual performance report and whether it included customer callback wait times. If the Company failed to include this metric in the filing, OPC recommended that BGE be required to resubmit a corrected report with the data requested in the December 11 letter.

COMMISSION DECISION

Under Code of Maryland Regulations 30.32.01.03B, a utility is required to investigate customer disputes or inquiries and propose any resolution or finding to the customer. BGE cannot fulfill this legal obligation if customers are unable to reach a call center representative to make the inquiry. BGE acknowledges there are systemic failings with its call center. These issues, which are anticipated to worsen over the coming weeks with increased call volumes, drive the need for immediate and corrective action.

First, the Commission hereby initiates Case No. 9850 for the purpose of housing documents and filings associated with the investigation of BGE's call center operations.

Second, the Commission reaffirms that BGE should proceed immediately with its proposed solutions as authorized during the December 17 hearing. This includes increased internal and contractual staffing as well as technological refinements to improve callback accuracy and expand customer self-service.

Third, while not addressed at the hearing, BGE committed to a plan, as presented to the Commission during a recent proceeding in Public Conference 59 (PC 59), to support customers on Maryland's Low Income Home Energy Assistance Program (LIHEAP).⁴ The Commission finds those commitments also support the overall goal of the interim customer protections discussed in this Order. BGE's PC 59 commitments protect limited-income customers from service disconnections for nonpayment and may aid in resolving the frequent issues inundating the call center. Moreover, the commitments are generally consistent with Governor Moore's recent Executive Orders prioritizing, among other things, energy affordability and assistance for low- to moderate-income households.⁵ In view of the Executive Orders, the Commission expects that BGE will maintain those commitments concerning LIHEAP customers as described in PC 59.

Fourth, BGE is directed to work with Staff and OPC to develop appropriate metrics for tracking call center performance and improvement that will be reported in Case No. 9850. The new metrics must accurately capture interactions between the Interactive Voice Response (IVR) and callback systems. Given that OPC's December 11 inquiry is germane to the parties' effective collaboration, BGE shall provide the information requested.

Fifth, BGE shall develop and file with the Commission a CAP by no later than January 20, 2026. The CAP must include the new call center metrics developed in coordination with Staff and OPC. The CAP must also describe any modifications to the IVR, callback tool, and customer queue

⁴ See PC 59, *Limited Income Mechanisms for Utility Customers*, available at <https://webpscxb.psc.state.md.us/DMS/pc/pc59> (last visited Dec. 26, 2025).

⁵ Moore, Wes, Providing Emergency Energy Assistance to Marylanders. Executive Order 01.01.2025.24, Nov. 7, 2025, available at <https://governor.maryland.gov/news/pages/executive-orders.aspx> (last visited Dec. 23, 2025); Moore, Wes, Building an Affordable and Reliable Energy Future. Executive Order 01.01.2025.27, Dec. 19, 2025, available at <https://governor.maryland.gov/news/pages/executive-orders.aspx> (last visited Dec. 23, 2025).

features—such as providing the specific number of people in queue rather than estimated wait times—that are designed to cure existing deficiencies and elevate the overall customer call center experience. Although the Commission finds merit in the suggestion that BGE operate its call center 24 hours a day, seven days a week, the Commission is cognizant there could be potentially significant costs for transitioning to such service. The Commission therefore directs BGE to include with the CAP a detailed discussion on the feasibility and costs of operating the call center 24/7. If BGE deems this model cost-prohibitive or otherwise impracticable, the Company shall identify reasonable alternatives for ensuring adequate customer support.

Sixth, to mitigate potential harm to customers while BGE corrects these deficiencies, BGE shall cease all dunning activities, including: issuance of new notifications for overdue payments; collection activities for overdue payments; and service interruptions/termination for nonpayment. This limited moratorium is effective immediately and shall remain in effect until February 28, 2026. The Commission may rescind the moratorium upon implementation of an approved CAP or extend it, if necessary.⁶ During this time, customers are still obligated to pay for service.

The Commission recognizes that certain dunning-related communications may have been generated, scheduled, or released prior to the effective date of this Order and therefore may issue notwithstanding the Company's good-faith efforts to suspend such activity. The Commission does not require BGE to recall or reverse communications that have already been released into downstream systems. However, BGE shall take all reasonable steps to halt further issuance of dunning-related notices and activities as expeditiously as practicable. The Commission further recognizes that, upon expiration or rescission of the moratorium, the orderly resumption of dunning activities will require operational planning and system adjustments. Incremental costs associated with suspending, modifying, and later reinstating dunning-related systems, workflows, and communications may be recorded in the regulatory tracker authorized below.

The Commission recognizes that this limited moratorium may effectively reduce call volume. BGE shall take this into account when developing the CAP.⁷ The Commission is mindful that there may be an increase in costs to remediate concerns related to the call center. However, it remains to be determined whether customers should be held financially responsible for costs to cure these call center issues to the extent said costs will impact BGE's rates in the future. The Commission is also cognizant that the limited moratorium carries financial implications of increased arrears, which may also implicate rates in the future. The Commission therefore authorizes BGE to establish a regulatory tracker to record incremental costs stemming from this limited moratorium, as well as call center expenses and corrective implementation costs incurred before and after this Order. To the extent BGE seeks to recover these costs in its next rate case, the Commission will examine the prudence of these expenditures at that time.

⁶ Alternatively, the Commission may determine that further action is warranted.

⁷ A drop in call volume from the temporary cessation of termination activities shall not be used as a reason to avoid permanent corrective measures.

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Finally, the Commission recognizes that customers may have experienced termination of service or paid past due penalties without the opportunity to speak to a BGE representative. The Commission hereby directs Staff to investigate whether this inability to communicate with the Company resulted in violations of the Commission's service termination and/or other regulations. If Staff determines that such violations occurred, it shall work with CAD to determine what remedies may be appropriate, including initiating a formal complaint on behalf of those customers.

By Direction of the Commission,

Andrew S. Johnston

Andrew S. Johnston
Executive Secretary