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## PUBLIC SERVICE COMMISSION

February 26, 2026

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

On January 28, 2026, the Commission issued a Follow-Up Notice for Baltimore Gas and Electric Company (“BGE” or the “Company”) to appear and address concerns raised by the Commission in response to the Corrective Action Plan (“CAP”) filed by the Company on January 20, 2026. Following a hearing held on February 4, 2026, and upon further consideration of the comments by the Commission’s Consumer Affairs Division (“CAD”), the Office of People’s Counsel (“OPC”), and Commission Technical Staff (“Staff”) (collectively, “the Agencies”) (together with BGE, the “Parties”),<sup>1</sup> 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

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<sup>1</sup> The Parties’ responses at the February 4, 2026 hearing further informed the Commission’s decisions in this Order.

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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 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 a hearing held on December 17, 2025, CAD summarized a surge in BGE complaints, primarily driven by customers’ inability to reach the call center regarding billing charges and service terminations.<sup>2</sup> CAD observed this issue appears to be unique to BGE, as other Maryland utility customers have not complained of inaccessibility during this period. OPC confirmed the rise in customer calls regarding BGE’s call center inaccessibility and excessive waiting times. BGE admitted its call center inaccessibility is a significant problem. The Company did not deny or dispute the reports presented by CAD and OPC. 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 waiting times, and longer queues. The Company acknowledged the strain placed on its customers.

On December 30, 2025, the Commission issued a Letter Order directing BGE to develop and file a CAP to remedy systemic failings regarding the accessibility of its customer service call center and to undertake additional measures to protect customers, including the immediate cessation of dunning activities until February 28, 2026.<sup>3</sup> BGE was required to coordinate with

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<sup>2</sup> 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.

<sup>3</sup> Maillog No. 325708.

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Staff and OPC to develop appropriate metrics to track call center performance and improvements.

BGE filed its CAP on January 20, 2026.<sup>4</sup>

On February 2, 2026, the Agencies filed joint comments on the CAP, highlighting specific concerns regarding, among other things as discussed below, BGE's metrics and reporting cadence.<sup>5</sup>

### **BGE'S CORRECTIVE ACTION PLAN**

BGE's CAP noted, "[b]etween July and mid-November 2025, [BGE] customers faced challenges accessing the Company's call center." To resolve issues with accessibility, the proposed CAP contained a number of proposed measures. First, the CAP outlined a list of proposed metrics and proposed to report these metrics quarterly. Proposed metrics included areas such as calls to BGE's Customer Care Center ("Care Center"), answer times, calls abandoned, and call-back times. Proposed metrics also included staffing and information on operational times, as well as information about BGE's Interactive Voice Response system and other topics related to customer service.<sup>6</sup>

In its CAP, BGE reported augmenting the staffing of its Care Center and reviewing internal processes to identify efficiencies and streamline customer interactions. Additionally, the Company reported it is promoting and expanding self-service options across its digital platforms. To address challenges with the call system itself, the CAP stated the Company is actively working with its callback system vendor, Mindful, to improve the system.<sup>7</sup>

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<sup>4</sup> Maillog No. 326418.

<sup>5</sup> Maillog No. 326791.

<sup>6</sup> Maillog No. 326418 at 2-4.

<sup>7</sup> *Id.* at 5.

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In response to the Commission's inquiry regarding the feasibility of staffing its Care Center 24 hours per day, seven days per week, BGE reported it would cost approximately \$4.7 million per year and would not necessarily address its deficiencies, the most pressing of which is staffing personnel shortages and reducing call efficiency constraints during peak call times. The Company reported it would consider extending its call center hours to 8:00 p.m. Monday through Friday (one additional hour per day),<sup>8</sup> which would cost approximately \$400,000 annually. BGE explained that peak call times are between 10:00 a.m. and 2:00 p.m., and that call volume after 7:00 p.m. is extremely low.<sup>9</sup>

#### **RESPONSES TO BGE'S CORRECTIVE ACTION PLAN**

Upon initial review of the CAP, the Commission found that further information would be required to determine the sufficiency of the proposed plan. While the CAP outlined various metrics for the Care Center and discussed actions related to staffing and technical systems, it lacked several critical components necessary for the Commission to evaluate its potential for success, including baseline values for the proposed metrics as to allow comparison of the Company's performance against historical data; specific quantitative targets or benchmarks to enable objective assessment of progress or ultimate success of the CAP; clear criteria for determining when the CAP has been successfully implemented and the deficiencies resolved; and a reporting cadence with sufficient frequency to allow for appropriate progress monitoring. Accordingly, the Commission directed the Company to appear on February 4, 2026, to address questions and concerns.<sup>10</sup>

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<sup>8</sup> Under BGE's current business model, customer service specialists in the Care Center handle business calls from 7:00 a.m. through 7:00 p.m., Monday through Friday, while emergency calls are answered 24/7. Maillog No. 326418 at 6.

<sup>9</sup> *Id.* at 6-7.

<sup>10</sup> Maillog No. 326603.

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The Agencies shared the Commission’s concerns. In their February 2, 2026 joint filing, the Agencies reported challenges coordinating with BGE to determine appropriate metrics. They also reported continued challenges customers are experiencing in trying to access BGE’s customer service systems. Notably, the joint filing states:

BGE’s proposed CAP states that “Between July and mid-November 2025, Baltimore Gas and Electric Company...customers faced challenges accessing the Company’s call center.” However, as evidenced by the December 2025 data provided by BGE, referenced above, BGE’s call center accessibility issues have persisted beyond “mid-November 2025.” Further, CAD has continued to track where complainants describe BGE customer service inaccessibility in the narrative section of their complaints. At the time of the Commission’s December 17, 2025 hearing, CAD shared that, of the 657 complaints CAD received against BGE from July 1, 2025 – November 16, 2025, 144 (21.92%) of those complaints specifically noted customer difficulty reaching BGE. From November 17, 2025 – January 18, 2026, CAD received an additional 556 complaints against BGE. In that period, 135 (24.28%) of those complaints specifically noted customer difficulty reaching BGE.<sup>11</sup>

The joint filing also details other concerns the Agencies have with the CAP. First, they agreed the CAP should include baseline values and requested data from at least the past three calendar years (2023, 2024, and 2025) to compare BGE’s recent and future performance. Second, they agreed the CAP must include quantitative target values and clear criteria to determine when the CAP has been successfully implemented and the deficiencies resolved. The Agencies recommended that the Commission order BGE to adopt the call center performance metrics outlined in their joint filing, as opposed to the call center performance metrics proposed by BGE in its CAP. The Agencies further recommended a monthly and quarterly reporting cadence, as opposed to the quarterly reporting cadence proposed in the CAP. Finally, the Agencies recommended that the Commission place BGE on notice that civil penalties may be warranted if

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<sup>11</sup> Maillog No. 326791 at 6.

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BGE does not achieve industry standards for call center performance metrics on a consistent basis, and for violations of the Code of Maryland Regulations (“COMAR.”)<sup>12</sup>

These issues were discussed at the February 4, 2026 hearing. Following the hearing, BGE and the Agencies met to reach a consensus on reporting metrics. In a Joint Stipulation Regarding Metrics Reporting filed on February 6, 2026, the Parties agreed that BGE will report the metrics and descriptions proposed by the Agencies in Exhibit A of their February 2, 2026 filing. Further, BGE will report on the proposed metrics on a monthly and quarterly basis.<sup>13</sup>

### **DISCUSSION AND COMMISSION DECISIONS**

Under COMAR 20.32.01.03B, 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. While the Commission notes the actions the Company has taken and plans to take, we remain concerned that the Company has not adequately resolved the issues that necessitated this proceeding in the first place. This is a particular concern as customers begin to grapple with the effects of winter temperatures on their bills, which may result in high call volumes. Accordingly, the Commission directs the Company to take the actions outlined below.

First, the Commission appreciates the Parties’ efforts to reach agreement on reporting metrics and the frequency of reporting. The Commission approves the agreed-upon metrics and reporting frequency as specified in the Parties’ February 6, 2026 Stipulation. BGE is directed to

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<sup>12</sup> Maillog No. 326791.

<sup>13</sup> Maillog No. 326928.

begin reporting on April 1, 2026, and monthly and quarterly thereafter. The Commission notes that, as BGE submits its regular reports, the need for additional metrics or fewer metrics may become apparent. The Commission invites the Parties to propose additions to or subtractions from the reporting metrics in the future.

Second, the Commission remains concerned that, without historic data to develop a baseline for performance, it will be difficult to compare and evaluate the Company's success or failure going forward. The Commission agrees with the Agencies' baseline span recommendation and directs BGE to include baseline values from at least the past three calendar years (2023, 2024 and 2025) with its April 1 report to allow a comparison of the Company's current performance against historical data. If BGE does not have data reaching that far back, BGE must report this to the Commission and identify the historical data that is available.

Third, the Commission also remains concerned that the CAP does not include quantitative targets or benchmarks to enable the Commission to objectively assess progress or the ultimate success of the CAP. Because BGE and the Agencies have not come to agreement on this issue, the Commission finds it is necessary to continue to mitigate potential harm to customers while BGE implements its CAP and resolves issues with its Care Center. BGE shall continue the limited moratorium on dunning activities ordered by the Commission on December 30, 2025, including: (1) issuance of new notifications for overdue payments; (2) collection activities for overdue payments; and (3) service interruptions/termination for nonpayment.<sup>14</sup> Any time after its April 1, 2026 report, the Company may petition the Commission to lift the moratorium. The Company must be able to demonstrate improved and sustained improvement of Care Center operations using

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<sup>14</sup> Maillog No. 325708.

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metrics that the Company must demonstrate as reasonable to lift the moratorium. Once a petition is submitted, the Commission will determine next steps. The Parties may consider working together to develop an alternative approach to demonstrating satisfactory call center performance and may request the Commission consider modifying this provision at that time. Any alternative approach must be able to demonstrate acceptable call center performance over a satisfactory period of time. Until the moratorium is lifted, customers are still obligated to pay for service.<sup>15</sup>

As the Commission previously stated, the continuation of the limited moratorium may effectively reduce call volume. BGE shall take this into account when reporting on its progress. The Commission remains mindful there may be an increase in costs to remediate BGE's Care Center deficiencies and that the limited moratorium carries financial implications of increased arrears, which may also implicate rates in the future. In its December 20, 2025 Letter Order, the Commission authorized BGE to establish a regulatory tracker for recording incremental costs stemming from the limited moratorium, as well as call center expenses and corrective implementation costs.<sup>16</sup> This tracker is now classified as a regulatory liability. The lack of actionable metrics and standards by which to evaluate BGE's Care Center performance during the moratorium has resulted in a situation where there is no certainty when it will be appropriate to lift the moratorium. Customers should not bear the risk from this uncertainty, and any increased costs should not accrue to the detriment of customers. 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.

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<sup>15</sup> The Commission acknowledges OPC's February 23, 2026 letter requesting the indefinite extension of the moratorium. Maillog No. 327326.

<sup>16</sup> *Id.*

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To be clear, the Commission remains concerned with the pace at which BGE appears to be applying measures to return its Care Center operations to a satisfactory level. While the Commission appreciates the Company's reported progress in the right direction, the Commission nonetheless expects faster resolution. If BGE fails to accelerate these Care Center improvements, the Commission may consider further action, including, but not limited to, civil penalties as appropriate.

Finally, the Commission reaffirms that BGE should proceed with other proposed solutions as discussed at the December 17, 2025 hearing and later outlined in the CAP. This includes increased internal and contractual staffing as well as technological refinements to improve callback accuracy and expand customer self-service.

By Direction of the Commission,

*/s/ Andrew S. Johnston*

Andrew S. Johnston  
Executive Secretary