



Enhancing Customer Payment Approaches to Better Serve Residential and Small Business Customers

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JD Power and other studies show that customers highly value choice in payment options and that includes digital options. Year over year, data show that electric company customers continue to shift from using paper checks to digital payment options (e.g., website, app, text, electronic bank payment, credit cards, and debit cards, Apple Pay, and Google Pay). As customer preferences continue to change, the electric power industry increasingly is expanding its digital payment channels and accepted payment methods beyond credit and debit cards to include Apple Pay, Amazon Pay, PayPal, and Venmo to provide the payment options that customers want. As a result, electric companies are looking to put all payment options on a level playing field for customers by eliminating fees for certain payment options such as credit and debit card fees.¹ Today, at least 31 investor-owned electric companies have regulatory approval for some type of cost recovery to support fee-free credit and debit card payments.

Offering fee-free payment options improves customer satisfaction, aligns electric companies with payment trends of other industries, and supports the growing number of customers who prefer the convenience of digital payments but are disgruntled by having to pay a “fee” when using a credit or debit card for payment. For the roughly five percent of unbanked customers in the United States

¹ Joint Companies Testimony on Fee Free D.P.U. 20-91 Exhibit JC-Testimony-1 March 8, 2021, Page 20 of 49. <https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/13232062>

who rely on pre-paid cards that act like a debit or credit card to pay their bills, eliminating these fees provides direct benefits to this population.²

This issue brief discusses emerging digital payment trends, the benefits of expanding fee-free payment options, the types of customers using different payment options, and why creating a level playing field across payment options makes sense. It also provides an overview of the current regulatory treatment for digital payment options.

Digital Payment Trends: The New Normal

Today's residential and small business customers expect bill payment options from electric companies to be consistent with what they experience in other areas of their lives and business interactions; customers want digital payment options. According to McKinsey & Company's **2021 Digital Payments Consumer Survey**, in 2021, 82 percent of Americans used a digital payment channel – defined to include browser-based or in-app online purchases, in-store checkout using a mobile phone and/or QR code, and person-to-person payments compared to 78 percent in 2020, and 72 percent five years ago.³

Figure 1 illustrates 2021 consumer survey results from Fiserv, an industry leader in payment card processing, on customer preferences for various bill pay options.⁴ When asked how important it is to offer different ways to pay, 84 percent say paying by credit card is either a “must have” or “nice to have” and 79 percent say the same for debit card payments. For younger customers (millennials or Gen Z) the results are even more dramatic: 94 percent say payment by debit cards is a “must have” or “nice to have.” Most customers say digital methods such as digital payment apps and mobile wallets are a “must have” or “nice to have.”

Digital payments are the new normal. A 2019 study by The Federal Reserve Bank of Boston showed that growth in the use of credit and debit-card transactions increased by almost **nine percent per year** on average between 2015 and 2018.⁵ One example of this trend is the U.S. federal government, which is moving toward electronic payments and away from checks and

² Federal Deposits Insurance Corporation. October 2020. “How America Banks: Household Use of Banking and Financial Services.” <https://www.fdic.gov/analysis/household-survey/>

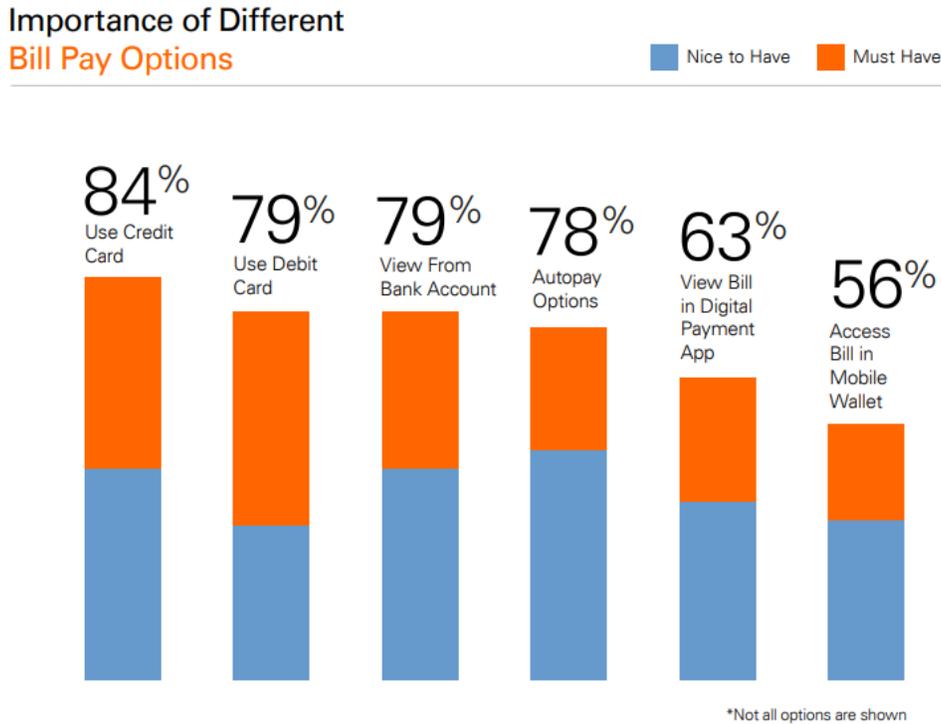
³ McKinsey & Company. Oct 2021. “New Trends in US Consumer Digital Payments.” <https://www.mckinsey.com/industries/financial-services/our-insights/banking-matters/new-trends-in-us-consumer-digital-payments>

⁴ Fiserv. Feb 2021. “Consumer Payments.” https://www.fiserv.com/content/dam/fiserv-ent/final-files/graphics/infographics/EE_Consumer_Payments_Executive_Summary_0221.pdf

⁵ Board of Governors of the Federal Reserve System. Dec 2019. “The 2019 Federal Reserve Payments Study”. <https://www.federalreserve.gov/paymentsystems/2019-December-The-Federal-Reserve-Payments-Study.htm>

cash. Individuals can now choose to receive their Social Security benefits through debit cards and some individuals received their COVID-19 federal stimulus payments on a Visa prepaid debit card.

Figure 1. Consumer Survey on Importance of Different Bill Pay Options (Fiserv 2021)



Source: Fiserv Consumer Payments (February 2021)

Despite this trend, electric company customers often have limited access or fee-based access to digital payment options. These customers often complain about digital payment fees because they do not see these fees for other purchases. Based on Eversource’s recent Billing & Payments survey in Massachusetts, approximately 41 percent of the customers surveyed indicated that the only reason they do not pay their utility bill with a credit or debit card is because of the fee.⁶ And, approximately 16 percent of dissatisfied customer comments (related to Billing & Payments) are dissatisfaction with credit and debit card fees.

In instances when electric companies offer digital options to customers without additional fees, more customers choose to use digital payments. Fiserv conducted research for electric companies comparing bill payment methods with and without fees. The results show that companies that

⁶ Joint Companies Testimony on Fee Free D.P.U. 20-91 Exhibit JC-Testimony-1 March 8, 2021, Page 20 of 49. <https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/13232062>

offered fee-free bill payment methods experienced at least double the year-over-year increase in the number of credit card transactions than those that offered fee-based bill payment methods.⁷

In 2018, a Con Edison quarterly customer experience survey included the question: “How can we improve your overall experience with Con Edison?” One of the top responses to this question was that Con Edison should allow for fee-free credit card/debit card payments. In 2020, Con Edison responded by offering fee-free digital payment options to residential and small commercial customers. Credit card usage increased from five percent in 2019 to 10 percent in 2021 after dropping the credit and debit card fees.

In 2018, in a filing to the South Carolina Public Service Commission, Duke Energy cited its monthly residential customer transaction surveys.⁸ When asked what they liked least about their billing and payment experience, customers noted:

- *“Take away the service charge. I just don’t understand why you want to charge somebody \$1.50.”*
- *“The only thing that I can say is I think they want to penalize you. If you want to pay a certain way, they charge you extra.”*

Duke Energy responded in 2019 by offering fee-free credit and debit card payments for residential customers in South Carolina. Despite an overall decline in total payment volumes stemming from the COVID-19 pandemic in 2020 and 2021, Duke Energy still experienced an increase of approximately 7 percent in card payments in South Carolina. Duke Energy has recently expanded its residential fee-free offering to North Carolina and Florida.

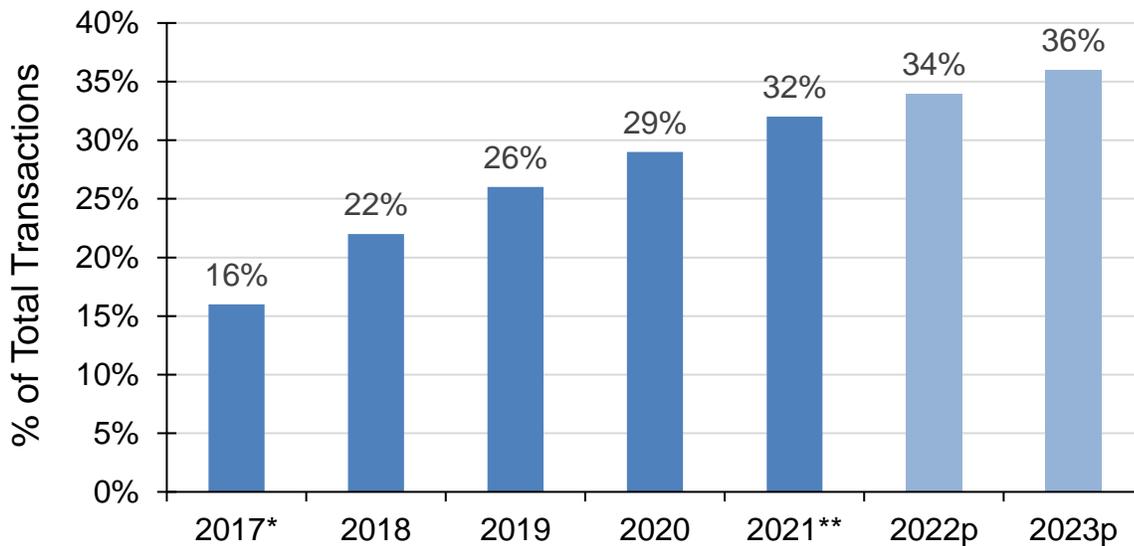
In January 2017, Consumers Energy removed credit and debit card payment fees. The use of credit and debit cards as a percent of total transactions increased from 16 percent in January of 2017 to 22 percent in 2018. Today, residential and business customer card use accounts for 32 percent of customer payments (see Figure 2).⁹ Consumers Energy expects credit card transactions to continue to grow.

⁷ DOCKET NO. 2018-319-E, Lesley Quick Testimony. <https://dms.psc.sc.gov/Attachments/Matter/c259ab6b-0131-4a40-9a5b-8999beeb46fb>

⁸ Ibid.

⁹ Consumers Energy. Case No. U-20697 “Direct Testimony of Michael A. Torrey”. February 2020. <https://mi-psc.force.com/sfc/servlet.shepherd/version/download/068t000000AEOofAAH>

Figure 2. Consumers Energy: Residential and Business Customer Credit Card Payments 2017-2023 (Percent of Total Payment Transactions)



*Credit Card fees removed in Jan 2017

**2021 includes actual usage through August and forecasted data from Sept. to Dec.

Source: Consumers Energy

More customers, particularly younger customers, are using payment options such as PayPal, Amazon Pay, Google Pay, and Apple Pay. At least seven electric companies offer these digital payment methods. Giving customers the option to pay by their method of choice, without incurring additional transaction fees, leads to greater customer satisfaction.

An Eversource and National Grid joint 2021 filing in Massachusetts cited the importance of convenient payment options to customer satisfaction. Specifically, they referred to a prior filing where the Massachusetts Department of Public Utilities stated that it “recognizes the importance of maintaining customer satisfaction by offering convenient payment options to customers.”¹⁰

Types of Residential Customers Using Digital Payment Options

All types of customers, including low-income customers and small business customers, benefit from having access to fee-free digital payment methods to pay electric company bills.

¹⁰ Joint Companies Testimony on Fee Free D.P.U. 20-91 Exhibit JC-Testimony-1 March 8, 2021, Page 16. <https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/13232062>

- At Eversource in Connecticut, low-income customers made up about 17 percent of all residential customer credit card payments in 2021 but represent only about 7 percent of the residential customer base. Hence, low-income customers are more likely to pay by credit card than other residential customers.
- For Alliant Energy, a recent survey of credit card transactions in three months of 2021 showed that customers receiving LIHEAP funds represented about 6 percent of all credit card transactions (whereas customers receiving LIHEAP funds in 2021 represented about 5 percent of Alliant Energy’s residential customers base).
- At Portland General Electric (PGE), as of 2021, 10 percent of all payments are made using debit or credit cards.¹¹
- At Con Edison, data from a 2019 filing shows that approximately 8 percent of customers enrolled in low-income programs pay their bill using credit or debit cards.¹²

In 2012, the National Association of State Utility Consumer Advocates (NASUCA) published a resolution highlighting the negative impacts of convenience fees for payment methods used by low-income customers.¹³ Specifically, NASUCA noted:

- “Some individuals, particularly those who lack access to bank accounts and to credit, by one estimate numbering roughly 50 to 70 million, are unable to write traditional checks or to direct electronic transfers and are therefore finding it difficult to pay utility bills without incurring additional charges.”
- “...against the backdrop of a continuing high national poverty level, a decline in median household income, and an increasing incidence of arrearages, the convenience fees for debit and credit card payments are adding unnecessarily to the expense of paying for utility services.”
- “...the convenience fees are making it unnecessarily costly for utility customers, especially low-income customers and customers struggling financially due to illness, layoffs, or other reasons, to meet their payment obligations and hence to maintain essential utility services.”
- “...the convenience fees make it hard for low-income customers, when paying utility bills, to use the payment method that is often most available to them, namely, prepaid debit cards.”
- “...convenience fees imposed on debit card use undercut the policy objectives of federal programs (for example, social security) and state programs (for example, child support and unemployment compensation) that issue prepaid debit cards to beneficiaries as an effective

¹¹ Portland General Electric. Case UE 394. “Direct Testimony of Bekkedahl/McFarland.” July 2021. <https://edocs.puc.state.or.us/efdocs/HTB/ue394htb155528.pdf>

¹² Con Edison. 2019 Base Rate: EXHIBIT_(CO-13). <https://documents.dps.ny.gov/public/MatterManagement/CaseMaster.aspx?Mattercaseno=19-E-0065>

¹³ NASUCA. July 2012. *Urging Utilities to Eliminate “Convenience” Fees for Paying Utility Bills with Debit and Credit Cards and Urging Appropriate State Regulatory Oversight.* <https://www.nasuca.org/2012-07-urging-utilities-to-eliminate-convenience-fees-for-paying-utility-bills-with-debit-and-credit-cards-and-urging-appropriate-state-regulatory-oversight/>

and cost-efficient way to manage operational expenses, by eroding the purchasing power of such cards.”

The same holds true today. Convenience fees for credit and debit cards (and other digital payment methods such as Amazon Pay, PayPal, and Venmo) hurt low-income and under/unbanked customers because it makes it harder for these customers to pay electricity bills using a method convenient to them, and potentially increases the risk of arrearages. In fact, according to a 2021 Pew Research Center survey, Americans with lower incomes are relying more on smartphones for online access and 76 percent of households with income less than \$30,000 have a smartphone.¹⁴

While it is important that electric companies make payments easier for customers by removing convenience fees, electric companies are not promoting credit and debit cards over other methods. Credit and debit card payments can pose a risk if customers end up paying interest and late fees.

Creating a Level Playing Field Across Payment Options Makes Sense

When most electric companies had brick-and-mortar offices where customers could make payments, the administrative costs of operating those facilities were recovered via rates. Digital payments, including credit and debit card transactions and other digital options, are today’s equivalent of the physical office. Hence, the fees associated with processing digital payment options should be recovered in rates. Why does this make sense?

1. First, the transaction and administrative costs associated with traditional forms of bill payment (i.e., paper checks, Automated Clearing House (ACH), wire transfer payments, etc.) are recovered through rates. Since digital payment options are preferred by many customers and often replace paper bills and paper checks (which are costly to process), any associated third-party fees should also be recovered in rates.
2. Second, when an electric company negotiates the payment fees associated with digital transactions rather than the customer, the electric company typically negotiates a significantly lower cost-per-transaction with the payment network such as VISA or MasterCard. For example, Avista Utilities negotiated a fee of about \$1.50 per-transaction versus the \$3.50 charge per-transaction fee paid by customers for credit and debit cards.¹⁵ Other electric companies such as Alliant Energy, Eversource, and Minnesota Power have negotiated similar favorable transaction fees.

¹⁴ Pew Research Center. June 22, 2021. “Digital divide persists even as Americans with lower incomes make gains in tech adoption.” <https://www.pewresearch.org/fact-tank/2021/06/22/digital-divide-persists-even-as-americans-with-lower-incomes-make-gains-in-tech-adoption/>

¹⁵ Avista. March 2016. DOCKET UE-160071, ORDER 01. <https://www.utc.wa.gov/casedocket/2016/160071/orders>

Snapshot of Payment Options Available & Regulatory Treatment of Fees

In response to customer preferences for digital payment options and aligning with the payment trends of other industries, electric companies have increased payment options available to customers including credit and debit cards and other digital payment options. Offering payment options that customers want increases customer satisfaction.¹⁶

In 2021 and early 2022, EEI developed a snapshot of customer payment options available today across the industry based on member company input. Figure 3 provides a summary of the types of digital (including fee-free credit and debit cards) and non-digital payment options that several EEI members are providing to customers. More specific details including the types of customers that fee-free credit and debit cards apply to, whether other digital payment options include fees, and links to associated regulatory filings are provided in Appendix A.

Overall highlights include:

- As of April 2022, at least 31 investor-owned electric companies offer fee-free credit and debit card payments across 22 states.
- Of the electric companies offering fee-free credit card payments, only 13 offer this service to all customers. Many of these offerings have been approved for residential customers only. In more recent regulatory approvals, fee-free credit and debit card payments are available to small business customers.
- In addition to the option to make payments on electric company websites, some electric companies have regulatory approval for expanded digital payment channels and methods including electric company mobile app, Amazon Pay, Amazon Alexa, Apple Pay, Google Assistant, Google Pay, PayPal, Pay-by-Text, Paymentus Digital Wallet, and Venmo. However, in some cases, these new digital payment offerings still include fees to the customer.
- Fees for payments at electric company-owned kiosks and at in-person locations vary. Electric companies are partnering with national retailers (e.g., Walmart), Western Union, local grocers and gas stations, and others to allow customers to make in-person bill payments at these locations.

As shown in Figure 3, electric companies are offering multiple digital payment options to their residential customers. However, regulatory approval for the recovery of fees varies across these options. In many cases, regulatory approval for cost recovery of fees is limited to specific types of payment methods, limited to specific customer types, or capped at a specific amount.

¹⁶ Joint Companies Testimony on Fee Free D.P.U. 20-91 Exhibit JC-Testimony-1 March 8, 2021, Page 16. <https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/13232062>

Figure 3. Snapshot of Customer Payment Channels and Methods Including Fee-Free Credit and Debit Cards, Digital Options, and Non-Digital Options (April 2022)

Electric Company & State		Digital Payment Options Available (with and without fees)									Non-Digital Payment Channels Available (with and without fees)		
Company	State	*Fee Free Credit / Debit Card Payments	Amazon Pay	Apple Pay	Google Pay	PayPal	Venmo	Mobile App	Pay-By-Text	Voice Assistant	Pay Stations/ APA	Walk-in Locations	Kiosks
AEP (Indiana Michigan Power)	IN MI	✓						✓			✓		
Alabama Power	AL		** Pending	✓			✓						
Alliant Energy (Interstate Power and Light Company)	IA	✓						✓	✓		✓		
Alliant Energy (Wisconsin Power and Light Company)	WI	✓						✓	✓		✓		
Ameren Illinois	IL	✓						✓			✓		
Ameren Missouri	MO	✓						✓			✓		
Arizona Public Service	AZ	*✓	✓			✓	✓	✓			✓		✓
Avista	ID WA	✓						✓	✓		✓		
Baltimore Gas & Electric	MD	✓						✓		✓		✓	
Central Hudson	NY	✓						✓			✓	✓	
ComEd	IL	✓	** Pending			✓		✓		✓		✓	✓
Con Edison	NY	✓		** Pending			** Pending	✓		✓	✓	✓	✓
Consumers Energy	MI	✓							✓		✓		
Dominion Energy	VA NC		✓			✓		✓				✓	
Dominion Energy	SC	✓						✓				✓	
DTE Energy	MI	✓						✓			✓		✓
Duke Energy	NC	✓						✓			✓		
Duke Energy	SC	✓						✓			✓		
Duke Energy	FL	✓						✓			✓		
Eergy	KS	✓						** Pending	✓	✓	✓	** Pending	✓
Eergy	MO	✓						** Pending	✓	✓	✓	✓	✓
Eversource	CT	✓							✓		✓		
Eversource	MA	** Pending							✓		✓		
Eversource	NH	✓							✓		✓		
Florida Power & Light	FL							✓			✓		
Georgia Power	GA	✓	** Pending	✓			✓						
Madison Gas & Electric	WI	✓							✓		✓		
Minnesota Power	MN	✓							✓		✓		
Mississippi Power	MS	✓	** Pending				✓						
National Grid	MA NY	** Pending						✓			✓	✓	✓

Note: All EEI member companies are not included.

* See Appendix for details on customer types.

** Pending regulatory approval.

Figure 3. Snapshot of Customer Payment Channels and Methods Including Fee-Free Credit and Debit Cards, Digital Options, and Non-Digital Options (April 2022) [continued]

Electric Company & State		Digital Payment Options Available (with and without fees)									Non-Digital Payment Channels Available (with and without fees)		
Company	State	*Fee Free Credit / Debit Card Payments	Amazon Pay	Apple Pay	Google Pay	PayPal	Venmo	Mobile App	Pay-By-Text	Voice Assistant	Pay Stations/ APA	Walk-in Locations	Kiosks
NorthWestern Energy	MT SD				** Pending	✓	** Pending		✓		✓	✓	
NV Energy	NV							✓		✓	✓		✓
NY State Electric & Gas	NY	✓						✓			✓	✓	✓
Orange & Rockland	NJ NY	✓								✓	✓	✓	✓
Pacific Gas & Electric	CA										✓		
Portland General Electric	OR	✓	✓	** Pending	** Pending	✓		✓			✓	✓	
PPL Corporation (LGE, KU, ODP)	KY VA		✓			✓	✓	✓	✓		✓	✓	
PPL Corporation	PA		** Pending	✓	** Pending	✓							
Public Service Enterprise Group	NJ		** Pending	✓	✓	✓	✓	✓					
Public Service Company of New Mexico	NM			** Pending	** Pending						✓	✓	
Puget Sound Energy	WA	✓						✓			✓		
Rochester Gas & Electric	NY	✓						✓			✓	✓	✓
Southern California Edison	CA							** Pending			✓		
Superior Water, Light & Power Company	WI	✓							✓		✓		
TECO	FL										✓		
Xcel Energy	MN, ND NM, SD TX			✓	✓			✓			✓		

Note: All EEI member companies are not included.

* See Appendix for details on customer types.

** Pending regulatory approval.

Examples highlighting how some electric companies are managing fees for digital payments are summarized below (see Appendix A for more details).

- ALLETE, Alliant Energy’s Wisconsin Power & Light, and Consumers Energy have regulatory approval for full cost recovery of debit and credit card fees for all types of customers.^{17 18 19}
- APS currently offers fee-free credit and debit card options for low-income customers enrolled in their Energy Support program and offers Amazon Pay, PayPal, and Venmo to customers for a fee.
- PGE currently offers fee-free credit and debit card payments for residential customers with the total dollar amount of cost recovery capped and has a pending filing for full cost recovery and to expand fee-free credit and debit cards to include small business customers. In addition, PGE offers other digital payment methods such as Amazon Pay and PayPal without fees. Filings to include Apple Pay and Google Pay are pending.²⁰
- Con Edison offers fee-free debit/credit payments to residential and small business customers. The credit and debit card offerings are available through multiple channels, including web, mobile app, and virtual assistant. Filings to include Apple Pay, Google Pay, and Venmo are pending.²¹
- DTE Energy and Puget Sound Energy offer fee-free credit and debit cards to residential and small business customers with full cost recovery.^{22 23}
- AEP’s Indiana Michigan Power, Avista, and Duke Energy offer fee-free credit and debit card payments for residential customers and have regulatory approval for full cost recovery.²⁴

¹⁷ Minnesota Power. Docket No. E015/GR-16-664. “*Direct Testimony Tina S. Koecher.*” Nov 2016. <https://efiling.web.commerce.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId=%7BE5CAB510-43AD-46C2-87A1-AD29EC26DD64%7D&documentTitle=201611-126219-03>

¹⁸ Wisconsin Power & Light. Docket No 6680-TE-103. “*Final Decision.*” Dec 2018. <https://apps.psc.wi.gov/ERF/ERFview/viewdoc.aspx?docid=%20355685>

¹⁹ Consumers Energy. Case No. U-20697 “*Direct Testimony of Michael A. Torrey.*” February 2020. <https://mi-psc.force.com/sfc/servlet.shepherd/version/download/068t000000AEOofAAH>

²⁰ Portland General Electric. Case UE 394. “*Direct Testimony of Bekkedahl/McFarland.*” July 2021. <https://edocs.puc.state.or.us/efdocs/HTB/ue394htb155528.pdf>

²¹ Con Edison. “*2019 Base Rate: EXHIBIT___(CO-13).*” <https://documents.dps.ny.gov/public/MatterManagement/CaseMaster.aspx?Mattercaseno=19-E-0065>

²² DTE Energy. “*Case No. U-20561.*” May 2020. <https://mi-psc.force.com/sfc/servlet.shepherd/version/download/068t000000BXp59AAD>

²³ Puget Sound Energy. “*Docket UE-160203, Order 01.*” March 2016. <https://www.utc.wa.gov/casedocket/2016/160203/orders>

²⁴ Indiana Michigan Power. Cause No. 44967-NONE “*Submission of Direct Testimony of Toby L. Thomas*” July 2017. https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/c7f09b82-23ee-ea11-a813-001dd8018921/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=PETITIONER%201%20030718.pdf

- Eversource offers fee-free credit and debit cards payments to residential customers in Connecticut with full cost recovery up to a predefined limit. In Massachusetts, Eversource has a pending filing for recovery of credit and debit card fees.²⁵

Conclusions

Today's residential customers expect bill payment options from electric companies to be consistent with what they experience in other areas of their lives. The electric power industry increasingly is expanding its digital payment channels and accepted payment methods to provide the payment options that customers want. For the roughly 5 percent of unbanked customers in the United States that rely on pre-paid cards to pay their bills, eliminating associated fees provides direct benefits to this population.

Over the past several years, aligning with payment trends of other industries, electric companies have increased customer choice in payment options by establishing digital, fee-free options, and other convenient channels. At least 31 investor-owned electric companies have gained regulatory approval to offer fee-free credit and debit card payments, but these approvals vary with respect to cost recovery (partial vs. full cost recovery) and the types of customers who are eligible. In addition, there are many other digital payment options that customers use beyond credit and debit cards such as Apple Pay, Amazon Alexa, PayPal, and Venmo.

Today's customers expect a range of digital payment options. Digital payments are the new normal and are used by all types of customers. It makes sense for electric companies to provide a range of fee-free digital payment options (including credit and debit cards) to their customers and for them to recover the associated costs.

²⁵ Eversource. D.P.U. 20-91 "Joint Direct Testimony of Penelope M. Conner and Richard D. Chin". March 2021. <https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/13232062>

Appendix

Table A1. Electric Company Payment Options for Customers: Summary (April 2022)

Electric Company & State		Credit and Debit Card Payment Details					Additional Payment Options (Digital and Non-Digital)		
Company	State	Fee/No Fee	Year Implemented / Year Updated	Customer Eligibility	Cost Recovery (Full/Partial/None)	Regulatory Filing	Other Digital Payment Options *(fees indicated)	Non-Digital Payment Options *(with or without fees)	
AEP (Indiana Michigan Power)	IN MI	No Fee	2018	Residential	Full	Cause No. 44967-NONE DIRECT TESTIMONY OF TOBY L. THOMAS	Mobile App	Pay Stations including Wal-Mart, Kroger, and various merchants/retailers (no fee)	
Alabama Power	AL	Fee	Does not apply					Paymentus Digital Wallet includes Amazon Pay, Apple Pay, Google Pay, PayPal, and Venmo (all pending)	Authorized Payment Locations managed by Western Union, Check Free Pay, PayGo, Fidelity Express, U.S. Payments PaySite Kiosk (no fee)
Alliant Energy (Interstate Power and Light Company)	IA	No Fee	2020	All	Partial	RPU-2019-0001 Direct Testimony of Zachary D. Fields (pg 17-18)	Mobile App Pay-By-Text	Western Union Convenience Pay Outlets (fee)	
Alliant Energy (Wisconsin Power and Light Company)	WI	No Fee	2019	All	Full	-PSC REF#: 348278 6680-TE-103 -COMMENTS OF THE CITIZENS UTILITY BOARD ON COMMISSION STAFF'S MEMORANDUM -FINAL DECISION	Mobile App Pay-By-Text	Western Union Convenience Pay Outlets (fee)	
Ameren Illinois	IL	No Fee	2021	All	Full	PA 102-0662 (Illinois law) signed September 15, 2021, specifically the Public Utilities Act, found at 220 ILCS 5/8-201.9	Website Mobile App IVR ACH	In-person Authorized Agents (fee)	
Ameren Missouri	MO	No Fee	2022	All	Full	ER-2021-0240: Direct Testimony of Mitchell Lansford	Mobile App	In-person Authorized Agents (fee)	
Arizona Public Service	AZ	No Fee	2021	Low Income	Full (Accounting deferral - pending review at next Rate Case)	Docket #E-01345A-19-0236, p. 86-87	APS App & website ACH (fee or no fee depends on payment type) PayPal (fee) Venmo (fee) Amazon Pay (fee)	Check mail in payments (no fee) Cash, check and card kiosks at retail stores (fee) Authorized walk up options at various locations managed by Fiserv and Moneygram (with and without fee - varies by location) Interactive Voice Recognition (IVR) - ACH (no fee)	
Avista	ID WA	No Fee	2016	Residential	Full	DOCKET UE-160071, ORDER 01	Mobile App Pay-By-Text	Check, Cash, Pay Station, ACH	
Baltimore Gas & Electric	MD	Fee using Paymentus	Does not apply					Through Paymentus: PayPal App Bill Pay (no fee) and Amazon Alexa smart Speaker (fee)	Third Party Vendor payment locations operated by ACE Cash Express, Western Union, Walmart and coming in 2022, Fidelity Express (fee)

Note: Standard payment options such as mail-in, website, auto-enroll, wire transfer, etc. are offered by electric companies and not captured in this table. All EEI member companies are not included.

* See regulatory filing or company website for specific details.

Table A1. Electric Company Payment Options for Customers: Summary (April 2022) [continued]

Electric Company & State		Credit and Debit Card Payment Details					Additional Payment Options (Digital and Non-Digital)	
Company	State	Fee/No Fee	Year Implemented / Year Updated	Customer Eligibility	Cost Recovery (Full/Partial/None)	Regulatory Filing	Other Digital Payment Options *(fees indicated)	Non-Digital Payment Options *(with or without fees)
Central Hudson	NY	No Fee	2018	All	Full	Cases 17-E-0459	Mobile App Pay-By-Text	Walk-In Centers (no fee) Payment locations at various Wal-Mart, grocery stores, pharmacies, and gas stations (Cash or debit card payments only)
ComEd	IL	No Fee	2021	All	Full	Public Act 102-0662 SB2408 Enrolled	Mobile App Paypal AI Chatbot Amazon Alexa (pending)	Check mail in payments (no fee) Authorized walk up options at various locations managed by Firsttech and CheckFreePay (fee), Kiosks (fee)
Con Edison	NY	No Fee	2020	Residential & Small Commercial	Full	Case 19-E-0065, EXHIBIT (CO-13)	Mobile App Voice Assistant Venmo (pending) Apple Pay (pending)	Walk In Locations, Pay Stations, Kiosks, and Field Assitant (no fee)
Consumers Energy	MI	No Fee	2017	All	Full	Case No. U-20697 DIRECT TESTIMONY OF MICHAEL A. TORREY	Mobile App Pay-By-Text	8 Direct Payment Offices (Lobbies) throughout Michigan **In-Payment Network including Wal-Mart, Kroger, and K-Mart (7-11, Dollar General, CVS, and Speedway pending)
Dominion Energy	VA NC	Fee				Does not apply	Mobile App Paypal (fee) Amazon Pay (fee)	Walk-in payments at Authorized Payment Centers such as Walmart, Harris Teeter, and Kroger (fee)
Dominion Energy	SC	No Fee	2009	Residential Customers (enrolled in paperless billing)	Full (company-borne costs through each normal rate case)	Docket No. 2020-125-E	Mobile App	Walk-in payments at Authorized Payment Centers such as Walmart, Kroger, and Piggly Wiggle (no fee)
DTE Energy	MI	No Fee	2019 2021	Residential & Small Commercial	Full	Case U-20162: Eliminate Credit Card Option for Specific C&I Rate Types Case U-20561: Further Restrict Credit Card Option to only C&I customers with aggregate bill < \$75,000	Mobile App	Cash payments at network of Authorized Pay Agents (fee/no fee varies) Cash payments at Company-owned Kiosks (no fee)
Duke Energy	NC	No Fee	2021	Residential	Full (Capped)	DOCKET NO. E-7, SUB 1214, Jim Henning Testimony DOCKET NO. E-7, SUB 1219, Jim Henning Testimony	Mobile App	Preferred payment locations including big box stores, grocery stores, convenience stores, and various smaller retailers (fee/no fee varies)
Duke Energy	SC	No Fee	2019	Residential	Full (Capped)	DOCKET NO. 2018-319-E, Leslev Quick Testimony DOCKET NO. 2018-318-E, Leslev Quick Testimony	Mobile App	Preferred payment locations including big box stores, grocery stores, convenience stores, and various smaller retailers (fee/no fee varies)
Duke Energy	FL	No Fee	2022	Residential	Full (Capped)	DOCKET NO. 20210016-EI	Mobile App	Preferred payment locations including big box stores, grocery stores, convenience stores, and various smaller retailers (fee/no fee varies)

Note: Standard payment options such as mail-in, website, auto-enroll, wire transfer, etc. are offered by electric companies and not captured in this table. All EEI member companies are not included.

* See regulatory filing or company website for specific details.

Table A1. Electric Company Payment Options for Customers: Summary (April 2022) [continued]

Electric Company & State		Credit and Debit Card Payment Details					Additional Payment Options (Digital and Non-Digital)		
Company	State	Fee/No Fee	Year Implemented / Year Updated	Customer Eligibility	Cost Recovery (Full/Partial/None)	Regulatory Filing	Other Digital Payment Options *(fees indicated)	Non-Digital Payment Options *(with or without fees)	
Evergy	KS	No Fee	2007 (KS Metro) 2014 (KS Central)	Residential	Full	Docket Details (ks.gov)	Mobile App (pending) Pay-By-Text	Pay Stations (free) Kiosk (free)	
Evergy	MO	No Fee	2007 (MO Metro) 2011 (MO West)	Residential	Full	Docket Sheet (mo.gov) - Evergy Metro Docket Sheet (mo.gov) - Evergy MO West	Mobile App (pending) Pay-By-Text	Pay Stations (fee) Kiosk (fee)	
Eversource	CT	No Fee	2019	Residential	Full (Capped)	Docket No. 17-10-46	Mobile App Pay-By-Text	Pay Stations with Authorized Agents within the State (no fee)	
Eversource	MA	No Fee	Pending Approval (filed 2021)	Residential	Full	D.P.U. 20-91, Exhibit JC-Testimony-1	Mobile App Pay-By-Text	Pay Stations with Authorized Agents within the State (no fee)	
Eversource	NH	No Fee	2021	Residential	Full (Capped)	Docket No. DE 19-057 Testimony of Penelope McLean Conner	Mobile App Pay-By-Text	Pay Stations with Authorized Agents within the State (no fee)	
Florida Power & Light	FL	Fee using Speedpay	Does not apply					Mobile App Bank Bill Pay Pay-By-Phone	Mail-in (no fee) Walk-in at various locations managed by Western Union and CheckFree (fee/no fee varies)
Georgia Power	GA	No Fee	2020	All	Full	(See Filing for Mississippi Power)	Paymentus Digital Wallet includes Amazon Pay, Apple Pay, Google Pay, and PayPal Venmo (all pending)	Authorized Payment Locations managed by Western Union, Check Free Pay, PayGo, Fidelity Express, U.S. Payments PaySite Kiosk (no fee)	
Madison Gas & Electric	WI	No Fee	2020	All	Full	Docket No. 5-UI-120 (temporary Covid Relief) Docket No. 3270-UR-123 (2021 Base Rates)	Pay-By-Text	Pay stations (no fee) Retail payment locations (no fee)	
Minnesota Power	MN	No Fee	2016	Retail	Full	Docket No. E015/GR-19-442 Frederickson Case Overview Direct Docket No. E015/GR-16-664 Direct Testimony Tina S. Koecher Docket No. E015/GR-16-664 Rebuttal Testimony Tina S. Koecher	Pay-By-Text	Pay at any Wal-Mart location (fee)	
Mississippi Power	MS	No Fee	2021	All	Full	DOCKET NO. 2019-UN-219	Paymentus Digital Wallet includes Amazon Pay, Apple Pay, Google Pay, PayPal, and Venmo (all pending)	Authorized Payment Locations managed by Western Union, Check Free Pay, PayGo, Fidelity Express, U.S. Payments PaySite Kiosk (no fee)	
National Grid	MA	No Fee	Pending Approval (filed 2021)	Residential	Full	D.P.U. 20-91, Exhibit JC-Testimony-1	Mobile App	Western Union walk-in locations (no fee) Western Union Expanded Network walk-in Locations (fee)	

Note: Standard payment options such as mail-in, website, auto-enroll, wire transfer, etc. are offered by electric companies and not captured in this table. All EEI member companies are not included.

* See regulatory filing or company website for specific details.

Table A1. Electric Company Payment Options for Customers: Summary (April 2022) [continued]

Electric Company & State		Credit and Debit Card Payment Details					Additional Payment Options (Digital and Non-Digital)	
Company	State	Fee/No Fee	Year Implemented / Year Updated	Customer Eligibility	Cost Recovery (Full/Partial/None)	Regulatory Filing	Other Digital Payment Options *(fees indicated)	Non-Digital Payment Options *(with or without fees)
National Grid	NY	Fee using Speedpav			Does not apply		Mobile App	Western Union walk-in locations (no fee) Western Union Expanded Network walk-in Locations (no fee) Kiosk Cash and Checks only (no fee) (Brooklyn) National Grid Walk-in offices Cash and Checks only (NYC and Long Island Only) (no fee)
NorthWestern Energy	MT SD	Fee using Paymentus			Does not apply		Pay-By-Text (no fee) Paymentus Digital Wallet	Walk-in customer service centers and any Western Union locations (fee), Paymentus IVR (ACH-no fee & Card-fee)
NV Energy	NV	Fee using Speedpav			Does not apply		Mobile App	Cash, check, and credit/debit card at various kiosks locations managed by U.S. Payments. (cash, check - no fee, credit/debit card - fee) Authorized walk up options at various Shop & Pay locations managed by Western Union Convenience Pay (no fee)
NY State Electric & Gas	NY	No Fee	2016	All		Case 15-E-0283	Mobile App	Pay Stations, Wal-Mart and Kmart (Nationwide) CheckFree Day, and Western Union (fee varies)
Orange & Rockland	NJ NY	No Fee	2019	Residential	Full	Case No. 18-E-0067	Amazon Alexa Google Assistant	Walk-In Centers and Authorized Payment Agents (no fee)
Pacific Gas & Electric	CA	Fee using Kubra			Does not apply		Mobile Autopay with Credit Card (pending) Secure eMail Payment	Authorized Neighborhood Payment Centers (no fee)
Portland General Electric	OR	No Fee	2015; Pending Approval- Small Business (filed 2021)	Residential; Small Businesses (pending)	Capped at \$1.5M; Full (Pending)	Commission Order No.14-422 (2015) UE 394 / PGE / 500 Bekkedahl - McFarland / 17 (2021)	Mobile App PayPal Amazon Pay Google Pay (pending) Apple Pay (pending)	Walk In Centers with WesternUnion and CheckFree Day (no fee)
PPL Corporation (LGE, KU, ODP)	KY VA	Fee for 3rd party vendors - Paymentus (credit/debit) FiServ (debit only)			Does not apply		Mobile App Pay-By-Text	Walk-In Business Offices - cash or check (free) Retailers/FiServ - cash (fee)
PPL Corporation	PA	Fee using Paymentus			Does not apply		Mobile App (pending) Amazon Pay (pending) Apple Pay (pending) Google Pay (pending) PayPal (pending) Venmo (pending)	Walk-In centers with Western Union and Check Free Pay (fee)

Note: Standard payment options such as mail-in, website, auto-enroll, wire transfer, etc. are offered by electric companies and not captured in this table. All EEI member companies are not included.

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Table A1. Electric Company Payment Options for Customers: Summary (April 2022) [continued]

Electric Company & State		Credit and Debit Card Payment Details					Additional Payment Options (Digital and Non-Digital)	
Company	State	Fee/No Fee	Year Implemented / Year Updated	Customer Eligibility	Cost Recovery (Full/Partial/None)	Regulatory Filing	Other Digital Payment Options *(fees indicated)	Non-Digital Payment Options *(with or without fees)
Public Service Enterprise Group	NJ	Fee				Does not apply	Mobile App Pay-By-Text Voice Assistants, Apple Pay (pending) Google Pay (pending) Venmo (pending) Paypal (pending)	Walk-In Centers (fee)
Public Service Company of New Mexico	NM	Fee using KUBRA EZ-PAY				Does not apply	Apple Pay (pending) Google Pay (pending)	PNM Payment Centers. Western Union Authorized Payment Agents (CPAY) (fee)
Puget Sound Energy	WA	No Fee	2016	Residential & Small Businesses	Full	Docket UE-160203_Order 01	Mobile App	Authorized Pay Stations including Wal-Mart, Fred Meyer, and Quality Food Centers (no fee)
Rochester Gas & Electric	NY	No Fee	2016	All	Full	Case 15-E-0283	Mobile App	Pay Stations, Wal-Mart and Kmart (Nationwide) CheckFree Day, and Western Union (fee)
Southern California Edison	CA	Fee				Does not apply	Mobile App (pending)	Authorized Payment Locations managed by Fiserv (no fee)
Superior Water, Light & Power Company	WI	No Fee	2019	All	Full	Docket No. 5820-UR-115 DIRECT SWLP SANDSTORM	Pay-By-Text	Pay at any Wal-Mart location (fee)
TECO	FL	Fee using KUBRA EZ-PAY				Does not apply		Pay at any locations nationwide offered through Western Union (fee)
Xcel Energy	CO, MI, MN, ND, NM, SD, TX	Fee using KUBRA EZ-PAY				Does not apply	Mobile App Apple Pay Google Pay	Pay Stations (fee)

Note: Standard payment options such as mail-in, website, auto-enroll, wire transfer, etc. are offered by electric companies and not captured in this table. All EEI member companies are not included.

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