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March 29, 2023

Ms. Brinda Westbrook-Sedgwick  
Commission Secretary  
Public Service Commission  
of the District of Columbia  
1325 G Street, N.W., Suite 800  
Washington DC, 20005

**Re: Formal Case No. 1050**

Dear Ms. Westbrook-Sedgwick:

Enclosed please find Potomac Electric Power Company's Annual Interconnection Report for 2022, pursuant to Section 40085 of Title 15 of the District of Columbia Municipal Regulations, as well as Order No. 17379 issued February 12, 2014 in this proceeding by the District of Columbia Public Service Commission.

Please feel free to contact me if you have any questions regarding this matter.

Sincerely,

*/s/ Dennis P. Jamouneau*

Dennis P. Jamouneau

Enclosures

cc: All Parties of Record



# **FC1050 Compliance Report for Pepeco**

**Covering Interconnection Applications Received  
January 1, 2022, through December 31, 2022**



## **I. Introduction**

Pursuant to § 4008.5 of Title 15 of the District of Columbia Municipal Regulations (DCMR), as well as Order Nos. 17379, 18113 and 18575 issued by the Public Service Commission of the District of Columbia (Commission), Potomac Electric Power Company (Pepco or the Company) submits its Annual Interconnection Report for 2022 (2022 Report).

## **II. Background**

On February 13, 2009, the Commission promulgated the District of Columbia Small Generator Interconnection Rules (DCSGIR) setting forth the procedures and standards for customers with on-site generation to interconnect with Pepco's electric distribution system. The DCSGIR requires, among other things, that Pepco maintain and track the Company's progress in implementing interconnections in the District of Columbia. Since that time, Pepco has been filing its Annual Interconnection Report and amending the report based on Commission orders and modifications to the Commission's regulations.

## **III. 2022 Report**

### **A. Information Required by Section 4008.5**

Section 4008.5 of the DCSGIR requires Pepco to submit to the Commission, within 90 days of the close of each year, a report detailing the following: (1) the total number of and the nameplate capacity of the interconnection requests received, approved, and denied under Level 1, Level 2, Level 3, and Level 4 reviews; (2) the number of interconnection requests not processed within the timelines established in the DCSGIR; and (3) the number of scoping meetings held and the number of feasibility studies, impact studies, and facility studies performed and the fees charged for these studies.

This section is written to comply with § 4008.5 of the DCSGIR.

- 1. In compliance with § 4008.5 (a) the estimated total amount of renewable energy credits to be obtained from solar energy systems meeting the requirements of D.C. Code §43-1432 (1) for which interconnection requests have been submitted in the previous six (6) months in its Quarterly Interconnection Report filed in accordance with Commission Order No. 18575.**

Pepco has provided the estimated total amount of renewable energy credits to be obtained from solar energy systems as part of its Quarterly Interconnection Report of the previous six (6) months. These files, FC1050-342 & 355 are located at the following link; [DCPSC E-Docket System](#)

- 2. In compliance with § 4008.5(b), the Company provides a public and confidential list of interconnection approvals for renewable generators (name, address, capacity (DC and AC), and system type) on the 15<sup>th</sup> of each month, for the previous month's interconnections:**

Pepco has provided the list of interconnection approvals for renewable generators as part of its Monthly Interconnection Report, of the previous month, on the 15th of each month. This file, FC1050-353 (Public) and FC1050-354 (Confidential), is located at the following link; [DCPSC E-Docket System](#)

## **B. Requirements from Order No. 17379**

The Commission directed Pepco to separately report: (1) any applications processed through the completeness review and deemed incomplete; (2) the reason(s) why each application is incomplete; and (3) a breakdown of application level. This section is written to comply with Order No. 17379.

### **1. Interconnection Requests Deemed Incomplete**

In 2022, the Company received and reviewed 934 interconnection requests that were deemed incomplete during the completeness review and returned them to customers and contractors for revisions. Of the 934 applications deemed incomplete, 762 were Level 1 requests, 164 were Level 2 requests, zero were Level 3 requests and 8 were Level 4 requests. A complete list of incomplete application reasons is shown in Table (ii) of Exhibit B.

### **2. Exhibits A and B**

Historically, Pepco has included an Exhibit A to consolidate interconnection compliance and statistics reporting in one table. In 2015, Order No. 17379 required modifications to Exhibit A. Specifically, the Commission directed Pepco to: (1) exclude incomplete applications from the total number of applications with reviews completed within the required timeframes; (2) include only first-time applications in the total number of applications with reviews completed within the required timeframe; (3) provide the total number of applications denied; (4) provide the total number of applications still pending; (5) provide the total number of applications incomplete; (6) provide the total number of applications withdrawn prior to approval; and (7) total number of resubmissions. On January 29, 2016, Order No. 18113, the Commission also directed Pepco to include a category that captures the number of unauthorized interconnections on an annual basis.

**In compliance with the Commission's requirements to modify Exhibit A, Pepco delineated its interconnection statistics into Exhibits A and B, with Exhibit A showing all interconnection requests in 2022 reviewed, processed,**

**deemed complete, approved, and unauthorized interconnections, and Exhibit B showing statistics on all incomplete requests processed.**

**In 2022, Pepco processed 2,891 interconnection requests (including 934 incomplete requests). This number of requests represents a 12.82% Decrease in interconnection requests compared to 2021.**

**In 2022, Pepco is unaware of any unauthorized interconnections that would be required to be reported to the Commission's Office of Compliance and Enforcement.**

### **C. Requirements from Order No. 18113**

The Commission directed Pepco to: (1) add an additional table similar to that which was provided in Commission Data Request No. 5, Question 14; (2) provide more detailed information as to why customers decided not to proceed with an interconnection project after scoping meetings; and (3) submit a confidential document listing Levels 2, 3, and 4 interconnection projects approved during the reporting year. Please also refer to Exhibit C.

#### **1. Exhibit C**

In compliance with the Commission's requirement to include additional Interconnection Requests and Application statistics, Pepco has delineated supplemental interconnection statistics in Exhibit C, which identifies all interconnection requests received and deemed complete, approved to install, under review on December 31, 2022, under review on December 31, 2022, withdrawn prior to approval, denied and not resubmitted, and revised after approval to install.

#### **2. Applications Withdrawn After Scoping Meeting**

In 2022, there were no scoping meetings.

#### **3. List of Interconnections Approved in 2022**

In compliance with the Commission's requirement to provide a confidential listing of interconnection applications approved during the 2022 reporting year, Pepco has provided the list of final interconnection approvals for renewable generators, which identifies the approved Level 2, 3, and 4 requests by customer name, address, fuel type, and kW<sup>AC.1</sup> This listing of approved interconnection applications, provides approved applications from the previous month, on the 15th of each month. These files, FC1050-315 (Public) and FC1050-316 (Confidential), are located at the following link; [DCPSC E-Docket System](#)

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<sup>1</sup> No Levels 3 or 4 applications were approved to operate in 2022.

**D. Requirements from Order No. 18575**

The Commission directed Pepco to provide a distribution of response time to customer calls. In addition, with respect to incomplete applications (1) distribution of the number of days required from the first submission of an incomplete application to final approval; (2) an explanation of whether resubmitted applications have any priority compared to other new applications; and (3) additional changes Pepco plans to implement to further improve the interconnection application process.

**1. Distribution of Response Time to Customer Calls**

Pepco’s Green Power Connection (GPC) team received 801 customer calls related to the interconnection process in 2022. 252 of these calls were routed to voicemail and, on average, voicemail calls were returned within one business day.

The following table provides a distribution of response times to customer calls that were routed to voicemail.

| <b>Distribution of Response Time to Customer Calls in 2022</b> |   |   |                      |
|--|---|---|----------------------|
| Within 24 hrs.   | Greater than 24 hrs. but not exceed 48hrs | Greater than 48 hrs. but not exceed 72 hrs. | Greater than 72 hrs. |
| <b>198</b>   | <b>15</b>                                 | <b>15</b>                                   | <b>24</b>            |

**2. Distribution from First Submission of an Incomplete Application to Final Approval of Interconnection Applications**

| <b>Distribution of the Average Number of Business Days from First Submission of an Incomplete Application to Final Approval of Interconnection Applications</b> |  |              |  |                     |                      |                          |   |
|---|--|--------------|--|---------------------|----------------------|--------------------------|---|
| Process step  | Acknowledgment of Incomplete Application | Resubmission | Acknowledgment of Complete Application | Approval to Install | Submission of Part 2 | Authorization to Operate | Total Processing Time from First Submission |
| Responsibility  | Company                                  | Customer     | Company                                | Company             | Customer             | Company                  | Company and Customer                        |
| Avg. Processing time  | 1.73                                     | 4.06         | 1.91                                   | 8.28                | 44.97                | 5.83                     | 54.7  |

In 2022, Pepco issued the final authorization to operate for interconnection applications in an average 54.7 business days from the date of first submission of

an incomplete application. As shown in the table above, the interconnection process includes a number of steps for which the processing time is outside the Company's control.

### **3. Re-submitted Applications**

When an application has been deemed incomplete, the customer and/or contractor are sent an email notification identifying the deficiencies and advising the customer to reapply. Each application submission is considered a new request, and all applications (including resubmitted applications) are processed in the order received. Resubmitted applications are not processed with any priority over other newly submitted applications.

### **4. Future Improvements to the Interconnection Process**

Pepco is continuously evaluating ways to improve the interconnection process. Pepco made updates to the ConnectTheGrid (also referred to as "CTG") online portal in an effort to reduce the number of incomplete applications:

- Updates were made to the application form fields to increase clarity and decrease time spent reviewing applications
- Supplemental forms were added to provide transparency, alignment and proactive communication for application review
- Document templates were added to allow users to download prefilled application document templates necessary reducing errors and missing documents

In 2022, Pepco added dedicated project managers to support large scale projects to oversee program activities and maintain communications between customers, developers, and leadership. This includes the addition of a weekly discussion with the Department of Energy and the Environment (DOEE) and District of Columbia Sustainable Energy Utility (DCSEU) to review project status, challenges, and opportunities.

## **IV. Customer Education and Outreach**

Pepco continues to support renewable energy and partners with its customers and key stakeholders to ensure safe and reliable interconnection of renewable energy to the electric grid.

In 2022, Pepco continued its Solar and Distributed Energy Resources Collaborative (the Collaborative) with the purpose of enhancing the relationship and collaboration between the Company and stakeholders with an interest in the implementation and expansion of solar and other Distributed Energy Resources (DER). Pepco hosted several activities which included:

- ConnectTheGrid Demo, January 31, 2022

- PHI Solar and DER Collaborative Webinar, April 6, 2022
- PHI Solar and DER Collaborative Webinar, August 30, 2022
- ConnectTheGrid Demo, December 14 & 15, 2022

The Collaborative meets to discuss solar and other DER topics relevant to the utility industry, the Company, and Pepco customers while using the CTG Demo sessions to focus on the enhancements and provide refreshers on the application portal. The Company uses feedback, suggestions, and recommendations from these DER Collaborative meetings to help influence communication tactics and key messages to customers, and influence strategic direction related to DER

**V. Timeliness of Application Review for Authorization to Operate—Order No. 18148 (Merger Order)**

The Company’s application review period for authorizations to operate (ATO) is measured from the time the Company receives a completed Part II request to the time the ATO letter is issued via the CTG portal.

Pepco issued 1,927 ATO letters to customers in 2022, an increase of 0.21% from 2021. The Company issued 98.7% of the Level 1 ATOs within the 20-business day timeframe for Level 1 interconnections.

**VI. Corrective Action Plan – 15 DCMR Sections 4004.7 and 4005.8**

Sections 4004.7 (Level I) and 4005.8 (Level II) require that Pepco develop and file a corrective action plan if the Company fails to issue at least 90% of ATIs within the timelines established in the respective regulations. In 2022, Pepco met the regulatory timelines for Level I applications for ATI 87% of the time, and for Level II applications Pepco met the regulatory timelines 52% of the time. Accordingly, Pepco is providing this corrective action plan. The reasons for non-compliance included:

- Applications under Level I and Level II increased in capacity and complexity, as more projects required upgrades, and thus more in-depth reviews of coincidental impacts. The engineering department required longer timelines to review the projects to determine the most efficient path to interconnect and issue cost estimates.
- The teams involved in the interconnection processed experienced staffing challenges during the year due to turnover, which severely affected meeting the aggressive timelines to perform the necessary steps to approve the interconnection requests.

The Company has assessed the findings of the annual timeliness for ATIs and implemented the following actions to improve measures:



- The Company will assess its resources to ensure that the appropriate allocations are in place for the adherence to the timeline.
- Reinforcing interconnection processes and timelines with the involved teams by conducting recurring refresher training exercises and status meetings.
- Enhancements will be implemented to streamline the interconnection process and to reduce the handovers with internal stakeholders.

The Company intends to conduct quarterly evaluations to determine whether the actions implemented improve the timeliness of ATIs. The implementation of the improvements began in the first quarter of 2023 and will be completed in the fourth quarter of 2023.

## EXHIBIT A

### 2022 Interconnection Requests and Application Statistics

| <b>Potomac Electric Power Company</b><br><b>Public Service Commission of the District of Columbia</b><br><b>FC1050 – Implementation of Interconnection Standards in the District of Columbia, 15 DCMR § 4008.5</b> |  |  |   |  |   |                            |
|--|--|--|---|--|---|----------------------------|
| (1)<br>Total Applications-<br>Complete and<br>Incomplete   | (2)<br>Total<br>Applicati<br>ons<br>Approved<br>to Install | (3)<br>Total<br>Denied<br>Applicati<br>ons | (4)<br>Total<br>Applications<br>Still Pending | (5)<br>Total<br>Incomplet<br>e<br>Applicatio<br>ns | (6)<br>Total<br>Application<br>s<br>Withdrawn<br>Prior to<br>Approval | Total<br>Resubmissi<br>ons |
| 2,891  | 2,721  | 0  | 744   | 934  | 520   | 851                        |

| Status                        | Number of Interconnection Applications |         |         |         |              |
|-------------------------------|--|---------|---------|---------|--------------|
|                               | Level 1                                | Level 2 | Level 3 | Level 4 | Total        |
| Received & Deemed Complete    | 2,359                                  | 377     | 0       | 8       | <b>2,744</b> |
| Approved to Install           | 2,371                                  | 347     | 1       | 2       | <b>2,721</b> |
| Under Review as of 12/31/22   | 0                                      | 10      | 0       | 0       | <b>10</b>    |
| Denied                        | 0                                      | 0       | 0       | 0       | <b>0</b>     |
| Review Deadline Missed        | 30                                     | 53      | 0       | 0       | <b>83</b>    |
| Approval Deadline Missed      | 307                                    | 152     | 0       | 0       | <b>459</b>   |
| Scoping Meetings              | 0                                      | 0       | 0       | 0       | <b>0</b>     |
| Impact Studies                | 0                                      | 0       | 0       | 0       | <b>0</b>     |
| Facility Studies              | 0                                      | 0       | 0       | 0       | <b>0</b>     |
| Feasibility Studies           | 0                                      | 0       | 0       | 0       | <b>0</b>     |
| Combined Studies              | 0                                      | 0       | 0       | 0       | <b>0</b>     |
| Fees Charged for Studies      | 0                                      | 0       | 0       | 0       | <b>0</b>     |
| Unauthorized Interconnections | 0                                      | 0       | 0       | 0       | <b>0</b>     |

## EXHIBIT B

### 2022 Incomplete Interconnection Requests and Application Statistics

(i) Timeframes for total incomplete applications received (all Levels)

| Level        | Incomplete Applications and<br>Number of Business Days to Respond per Level |             |           |          |          |                            | Total      |
|--------------|---|-------------|-----------|----------|----------|----------------------------|------------|
|              | 0 Days<br>(Same<br>Day)   | 1-3<br>Days | 4-6 Days  | 7-9 Days | 10 Days  | Greater<br>than 10<br>Days |            |
| <b>1</b>     | 146   | 574         | 34        | 1        | 0        | 7                          | 762        |
| <b>2</b>     | 13  | 99          | 46        | 6        | 1        | 0                          | 165        |
| <b>3</b>     | 0   | 0           | 0         | 0        | 0        | 0                          | 0          |
| <b>4</b>     | 0   | 1           | 5         | 1        | 0        | 0                          | 7          |
| <b>Total</b> | <b>159</b>  | <b>674</b>  | <b>85</b> | <b>8</b> | <b>1</b> | <b>7</b>                   | <b>934</b> |

(ii) Reasons for Incomplete Application Data

| Reasons For Incomplete Application Data | Number of Applications |
|---|------------------------|
| Missing Documents                       | 222                    |
| Missing / Mismatched Information        | 485                    |
| Inactive/Invalid Account                | 138                    |
| Oversized System                        | 89                     |
| <b>Total</b>                            | <b>934</b>             |

(iii) Incomplete Applications Excluding Re-Submissions:

| Level        | Number of<br>Applications |
|--------------|---------------------------|
| <b>1</b>     | 52                        |
| <b>2</b>     | 23                        |
| <b>3</b>     | 0                         |
| <b>4</b>     | 1                         |
| <b>Total</b> | <b>76</b>                 |

## EXHIBIT C

### Supplemental Interconnection Request and Application Statistics

| <b>Applications</b>                            | <b>Level 1</b> | <b>Level 2</b> | <b>Level 3</b> | <b>Level 4</b> | <b>Total</b> |
|--|----------------|----------------|----------------|----------------|--------------|
| Total received and deemed complete in 2022     | 2,359          | 377            | 0              | 8              | 2,744        |
|  |                |                |                |                |              |
| Approved to install in 2022                    | 2,371          | 347            | 1              | 2              | 2,721        |
| Under review as of 12/31/2021                  | 0              | 0              | 0              | 0              | 0            |
| Under Review as of 12/31/2022 (from exhibit A) | 0              | 10             | 0              | 0              | 10           |
| Withdrawn prior to approval                    | 370            | 142            | 3              | 5              | 520          |
| Denied   | 0              | 0              | 0              | 0              | 0            |
| <b>Total</b>                                   | <b>2,741</b>   | <b>499</b>     | <b>4</b>       | <b>7</b>       | <b>3,251</b> |
|  |                |                |                |                |              |
| Applications revised after Approval to Install | 251            | 80             | 0              | 0              | 331          |

## CERTIFICATE OF SERVICE

I hereby certify that a copy of Potomac Electric Power Company's Annual Interconnection Report for 2022 was served this March 29, 2023 on all parties in Formal Case No. 1050 by electronic mail.

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