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March 29, 2024

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 – Annual Interconnection Report

Dear Ms. Westbrook-Sedgwick:

Enclosed please find Potomac Electric Power Company's Annual Interconnection Report for 2023, 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 contact the undersigned if you have any questions.

Respectfully submitted,

/s/ Kimberly A. Curry

Kimberly A. Curry

Enclosure

cc: All parties of record



peperoSM

AN EXELON COMPANY

FC1050 Compliance Report for Pepero

**Covering Interconnection Applications Received
January 1, 2023, through December 31, 2023**



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 2023 (2023 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. 2023 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 15th 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 2023, the Company received and reviewed 1,082 interconnection requests that were deemed incomplete during the completeness review and returned them to customers and contractors for revisions. Of the 1,082 applications deemed incomplete, 895 were Level 1 requests, 183 were Level 2 requests, zero were Level 3 requests and 4 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 2023 reviewed, processed,

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

In 2023, Pepco processed 3,918 interconnection requests. This number of requests represents a 35% increase in interconnection requests compared to 2022.

In 2023, 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, 2023, under review on December 31, 2023, withdrawn prior to approval, denied and not resubmitted, and revised after approval to install.

2. Applications Withdrawn After Scoping Meeting

In 2023, there were no scoping meetings.

3. List of Interconnections Approved in 2023

In compliance with the Commission's requirement to provide a confidential listing of interconnection applications approved during the 2023 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^{AC,1}. 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](#)

¹ No Levels 3 or 4 applications were approved to operate in 2023.

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 264 customer calls related to the interconnection process in 2023. All 264 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.

Distribution of Response Time to Customer Calls in 2023			
Within 24 hrs.	Greater than 24 hrs. but not exceed 48hrs	Greater than 48 hrs. but not exceed 72 hrs.	Greater than 72 hrs.
134	68	23	39

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

Distribution of the Average Number of Business Days from First Submission of an Incomplete Application to Final Approval of Interconnection Applications							
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 & customer
Avg. Processing time	2.01	3.77	1.35	8.35	41.05	5.07	57.83

In 2023, Pepco issued the final authorization to operate for interconnection applications in an average 57.83 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. Improvements to the Interconnection Process

Pepco is continuously evaluating ways to improve the interconnection process. Pepco made the following updates to the ConnectTheGrid (also referred to as "CTG") online portal:

1. **DocuSign**, this allows CTG users to collect the necessary signatures at more points in the process than before, effectively streamlining the process flow.
2. **Billing Information Update**, requires customers and contractors to provide billing and invoicing information within the initial application form, streamlining the payment collection process.
3. **Pre-Applications**, this feature allows customers to easily submit a pre-application via the Connect the Grid portal. This will eliminate the need for manual document completion and allow customers to quickly pinpoint potential project issues prior to proceeding further.
4. **Help Center**, serves as a secure repository of knowledge, both assisting new users with onboarding and ensuring that vital information remains accessible even when team members transition.
5. **Notification enhancements**, Internal team members are automatically assigned to projects. This feature provides visibility for team members, empowering them to proactively identify and address any potential issues with the application.
6. **File Template Generation Search**, allows users to quickly search for file templates during the file generation process.
7. **Message center**, a centralized hub allows external users to conveniently manage all past messages across applications, while also allowing them to instantly send new communications. To preserve data security, certain filtering capabilities are not available for external users.
8. **Enhanced Dashboard**, provides a comprehensive and high-level overview of useful information such as an activity summary, application timeline and action required alerts.
9. **Duplicate Application Alerts**, This alert is designed to notify users when an application with a system address matching an existing one is submitted.

10. **Timer Configurations**, customers will now receive email notifications alerting them when they have not responded to PHI's last communication, specifically for status such as More Information Required and Conditionally Approved.

Additionally, continuous updates occur for the distribution circuit hosting capacity and heat maps in an effort to proactively monitor circuit capacity in anticipation of future interconnection, while maintaining reliability of service.

IV. Customer Education and Outreach

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

In 2023, Pepco continued its Solar and Distributed Energy Resources Collaborative (the Collaborative) to enhance 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, February 22 & 23 & 24 2023
- PHI Solar and DER Collaborative Webinar, March 17, 2023
- PHI Solar and DER Collaborative Webinar, June 28, 2023
- PHI Solar and DER Collaborative Webinar, October 25, 2023

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 2,510 ATO letters to customers in 2023, an increase of 30% from 2022. The Company issued 98.3% of the Level 1 ATOs within the 20-business day timeframe for Level 1 interconnections.

VI. Corrective Action Plan – 15 DCMR Sections 4005.8

Section 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 2023, Pepco met the regulatory timelines 76.10% of the time for Level II. Accordingly, Pepco is providing this corrective action plan. The reasons for non-compliance included:

- Applications under 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 process 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.
- Prioritizing the issuance of ATI for interconnection customers within the 15 days timeline while the company develops the cost estimate. Currently, the customer receives the ATI and cost estimate simultaneously which affects the ATI timeliness threshold.

The Company intends to conduct quarterly evaluations to determine whether the actions implemented improve the timeliness of ATIs.

EXHIBIT A

2023 Interconnection Requests and Application Statistics

Potomac Electric Power Company						
Public Service Commission of the District of Columbia						
FC1050 – Implementation of Interconnection Standards in the District of Columbia, 15 DCMR § 4008.5						
(1) Total Applications Complete and Incomplete	(2) Total Applications Approved to Install	(3) Total Denied Applications	(4) Total Applications Still Pending	(5) Total Incomplete Applications	(6) Total Applications Withdrawn Prior to Approval	(7) Total Resubmissions
3,918	3,661	0	26	1082	332	959

Status	Number Of Applications				
	Level 1	Level 2	Level 3	Level 4	Total
Received & Deemed Complete	3,260	529	0	12	3,801
Approved to Install	3,155	502	0	4	3,661
Under Review as of 12/31/23	9	14	0	3	26
Denied	0	0	0	0	0
Review Deadline Missed	15	23	0	1	39
Approval Deadline Missed	280	120	0	0	400
Scoping Meetings	0	0	0	0	0
Impact Studies	0	0	0	0	0
Facility Studies	0	0	0	0	0
Feasibility Studies	0	0	0	0	0
Combined Studies	0	0	0	1	1
Fees Charged for Studies	0	0	0	\$10,000	\$10,000
Unauthorized Interconnections	0	0	0	0	0

EXHIBIT B

2023 Incomplete Interconnection Requests and Application Statistics

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

Level	Incomplete Applications and Number of Business Days to Respond per Level						Total
	0 Days (Same Day)	1-3 Days	4-6 Days	7-9 Days	10 Days	Greater than 10 Days	
1	191	570	108	6	1	19	895
2	24	96	55	4	0	4	183
3	0	0	0	0	0	0	0
4	0	2	2	0	0	0	4
Total	215	668	165	10	1	23	1,082

(ii) Reasons for Incomplete Application Data

Reasons For Incomplete Application Data	Number of Applications
Discrepancy System Values	458
Missing Documentation	190
Missing Signature	105
Oversized	101
Missing Usage Calculator	79
Inactive Account	66
Facility Address Incorrect	36
Name Does Not Match Our Records	13
Missing Incomplete Account, No	13

Incorrect Level	9
Missing Email	7
Old Or Obsolete Form	5
Grand Total	1082

(iii) Incomplete Applications Excluding Re-Submissions:

Level	Number of Applications
1	109
2	14
3	0
4	0
Total	123

EXHIBIT C

Supplemental Interconnection Request and Application Statistics

Applications	Level 1	Level 2	Level 3	Level 4	Total
Total received and deemed complete in 2023	3,260	529	0	12	3,801
Approved to install in 2023	3,155	502	0	4	3,661
Under review as of 12/31/2022	0	0	0	0	0
Under Review as of 12/31/2023	9	14	0	3	26
Withdrawn prior to approval	198	127	0	7	332
Denied	0	0	0	0	0
Total	3362	643	0	14	4,019
Applications revised after Approval to Install	432	113	0	5	550

CERTIFICATE OF SERVICE

I hereby certify that a copy of Potomac Electric Power Company's Annual Interconnection Report for 2023 was served this March 29, 2024 on all parties in Formal Case No. 1050 by electronic mail.

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/s/ Kimberly A. Curry
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