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March 31, 2020

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 2019, 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,

A handwritten signature in blue ink, appearing to read "Andrea H. Harper".

Andrea H. Harper

Enclosures

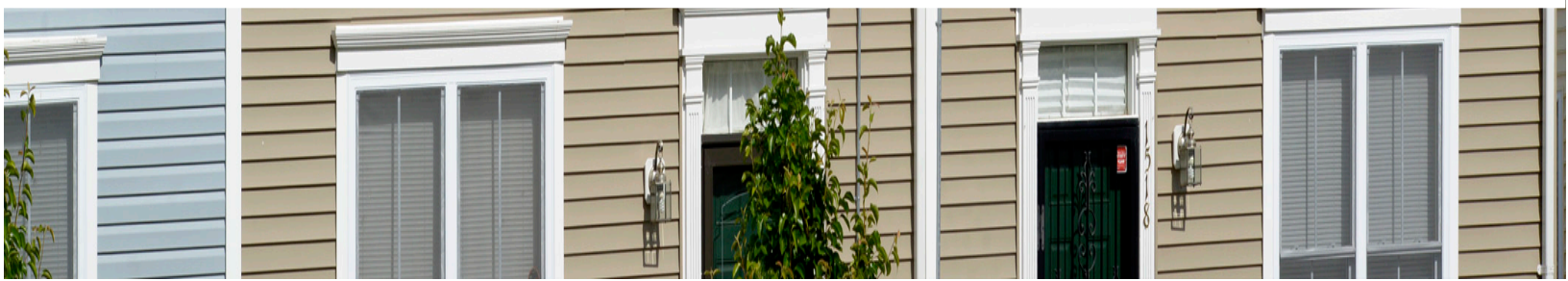
cc: All Parties of Record



An Exelon Company



**F.C. 1050 - Compliance Report for Pepco Covering Interconnection Applications
Received January 1, 2019 through December 31, 2019**



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 2019 (2019 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. On March 29, 2013, Pepco filed its Annual Interconnection Report for 2012 (2012 Report). On February 12, 2015, the Commission issued Order No. 17379, accepting Pepco's 2012 Report and directing certain modifications to Pepco's Annual Interconnection Report for 2013 and subsequent reports.

On February 29, 2016, the Commission issued Order No. 18113, directing Pepco to make certain modifications to its Annual Report, beginning with the March 30, 2016 report.

On March 23, 2016, in Formal Case No. 1119, the Commission issued Order No. 18148 which approved the merger of Pepco and Exelon and accepted settlement commitments to improve the interconnection process in the District.¹ On March 30, 2016, Pepco filed its Annual Interconnection Report for 2016 (2016 Report). On October 17, 2016, the Commission issued Order No. 18575, directing Pepco to make certain modifications to its Annual Report, beginning with the March 30, 2017 report. The aforementioned modifications required by Order Nos. 17379, 18113 and 18575 and commitments made in the merger proceeding are included in this report.

III. 2019 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 See Order No. 18148, Attachment B, Paragraph 123

1. In compliance with § 4008.5 (a) the Company reports, the total number of and nameplate capacity of complete interconnection requests received, approved, and denied under Level 1, Level 2, Level 3, and Level 4 reviews:

a. Interconnection Requests Received and Deemed Complete

In 2019, Pepco received and deemed complete 2,024² Level 1 requests, 244 Level 2 requests, 0 Level 3 requests, and 0 Level 4 requests.

The total kWAC inverter nameplate capacity for the all requests received and deemed complete in 2019 was 48,282.64 kWAC. Exhibit A provides details on the interconnection requests received and deemed complete by Pepco in 2019.

b. Interconnection Requests Approved to Install

In 2019, Pepco approved 2,324³ small generator interconnection requests for installation. The total kW^{AC} inverter nameplate capacity for requests approved in 2019 was 39,219.53 kW^{AC}.

Pepco approved 2,087 Level I interconnection requests for installation in 2019, with a total inverter nameplate capacity of 12,201.65 kWAC.

The Company approved 237 Level 2 applications for installation in 2019. The total inverter nameplate capacity for all Level 2 requests approved for installation was 27,017.89 kWAC.

Pepco received and approved no Level 3 nor Level 4 applications for installation in 2019.

Three Level 1 applications, 12 Level 2 and no Level 3 or 4 applications (for a total of 15) were pending technical screening as of December 31, 2019. Exhibit A provides further details on interconnection requests approved for installation in 2019.

c. Interconnection Requests Denied

No applications were denied at any level in 2019.

² Total applications submitted and deemed complete increased 34.1% compared to 2018.

³ Includes 76 requests received in 2018 and approved in 2019, and 23 requests received in 2019 and withdrawn prior to approval.

2. In compliance with § 4008.5(b), the Company reports the number of interconnection requests not processed within the timelines established in the rules:

a. Timeliness of Application Reviews for Completeness

Pepco completed the initial review for completeness for 99.77% of the 2,646 interconnection requests received during 2019 within the required timeframe. Six out of 2,646 requests were not completed in the required timeframe.

b. Timeliness of Application Reviews for Approval to Install

In 2019, Pepco completed 89.46% of the 2,324⁴ Approval to installs (ATI) within the required timeframe. Fifty-Six percent of the applications that failed to meet approval deadlines were CREF applications.

In 2019, 139 CREF applications failed to meet approval to install deadlines. The Company and other stakeholders are working together to develop CREF-specific rules with appropriate timelines through the Commission working group. Exhibit A provides further details on interconnection requests approved for installation in 2019

3. In compliance with § 4008.5(c) the Company reports, the numbers of scoping meetings held and feasibility studies, impact studies, and facilities studies performed and any fees charged for such studies:

Scoping meetings and studies are only necessary if an internal Pepco review determines that a specific interconnection request may cause an adverse impact on either Pepco's distribution system or on the reliability of electric service for customers on Pepco's distribution system.

Pepco held scoping meetings for 155 Community Renewable Energy Facility applications received in 2019. These meetings typically occur within the first week of the application receipt at no cost to the customer/developer.

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.

⁴ Total application reviews for Approval to Install increased 51.8% compared to 2018.

1. Interconnection Requests Deemed Incomplete

In 2019, the Company received and reviewed 360 interconnection requests that were deemed incomplete during the completeness review and returned them to customers and contractors for revisions. Of the 360 applications deemed incomplete, 317 were Level 1 requests, 43 were Level 2 requests, and 0 were Level 3 or 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 received; (4) provide the total number of applications approved to install; (5) provide the total number of applications denied; (6) provide the total number of applications still under review; and (7) provide the total number of applications withdrawn prior to approval. 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 2019 reviewed, processed, deemed complete, approved, and unauthorized interconnections, and Exhibit B showing statistics on all incomplete requests processed.

In 2019, Pepco processed 2,646 interconnection requests (including 360 incomplete requests). This number of requests represents an 34% increase in interconnection requests compared to 2018.

In 2019, Pepco had no unauthorized interconnection 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.

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, 2018, under review on December 31 2019, withdrawn prior to approval, denied and not resubmitted, and revised after approval to install.

2. Applications Withdrawn After Scoping Meeting

In 2019, 11 CREF applications were withdrawn after the scoping meetings. The scoping meetings for CREF projects is initiated during the first week preceding receipt of an application. These CREF projects continued through technical screening and subsequently withdrew after receiving approval to install.

3. List of Interconnections Approved in 2019

In compliance with the Commission's requirement to provide a confidential listing of interconnection applications approved during the 2019 reporting year, Pepco has provided Exhibit D (CONFIDENTIAL), which identifies the approved Level 2 and Level 4 requests by customer name, address, fuel type, and kWAC.⁵

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 3,144 customer calls related to the interconnection process in 2019. Seventy-three percent of, or 2,306 of, these calls were answered live by a member of the appropriate process group on the GPC team. Two hundred thirty seven (237) from District customers/contractors were routed to voice mail in 2019. Voicemail messages were responded to in two business days on average. Customers are typically routed to voicemail when attempting to contact the GPC team outside of normal business hours or during periods of high call volume when all Account Representatives are assisting other customers. The following table provides a distribution of response times to customer calls that were routed to voicemail.

⁵ No Levels 3 applications were approved to operate in 2019.

Distribution of Response Time to Customer Calls in 2019			
Within 24 hrs.	Greater than 24 hrs. but not exceed 48hrs	Greater than 48 hrs. but not exceed 72 hrs.	Greater than 72 hrs.
163	35	12	27

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

Distribution of the Average Number of Business Days from First Submission to Final Approval of NEM 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 and Customer
Avg. Processing time	1.09	13.77	1.08	4.47	44.45	3.86	68.72

In 2019, Pepco issued the final authorization to operate for NEM applications in an average of 68.72 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 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 successfully launched several new online tools as a part of the Exelon Utilities Digital Solar Toolkit (DST) initiative. The DST features included:

- Solar Calculator – an interactive experience that helps customers evaluate their potential for rooftop solar, including financial implications and available incentives to offset initial investment.

- Hire Right – offers tools, tips and resources to help customers identify/select qualified solar contractors.
- Energy Dashboard – provides overview of customers’ energy usage, consumption and savings.
- Community Solar Portal – enables Subscriber Organizations to manage their customer subscriptions online.
- Contractor’s Portal – consolidated educational resources and solar insights to support installers in their solar business.
- Interconnections/Project Tracker (launched Q1 2020) – online workflow enabling utility, contractor, and customers to track interconnection projects from application submission through completion.

IV. Customer Education and Outreach

In 2019, Pepco continued its Solar and Distributed Energy Resources Collaborative (the Collaborative) and its ongoing stakeholder 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). On October 2, 2019, Pepco hosted its Collaborative. Topics included:

- Green Power Connection General Update
- Digital Solar Toolkit Feature Review
- Interconnection/Project Tracker Demo
- Utility Evolution Discussion
- Interactive Circuit Map Demo
- Non-wire Alternatives
- Utility of the Future and Smart Grid Projects Overview
- Roadmap to Connected Communities
- Electric Vehicle Perspectives

The Collaborative formally meets at least annually to discuss solar and other DER topics relevant to the utility industry, the Company, and Pepco customers. The Company uses feedback, 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 mailed to the Customer.

Pepco issued 1,851 ATO letters to customers in 2019, a increase of 107% from 2018. The

Company issued 97% of the Level 1 ATOs within the 20 business day timeframe for Level 1 interconnections.

EXHIBIT A

2019 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 Received Complete and Incomplete	(2) Total Applicati ons Approved to Install	(3) Total Denied Applicati ons	(4) Total Applications Still Pending	(5) Total Incomplet e Applicatio ns	(6) Total Application s Withdrawn Prior to Approval	Total Resubmissi ons
2,646	2,324	0	15	360	23	333

Status	Number of Interconnection Applications				
	Level 1	Level 2	Level 3	Level 4	Total
Received & Deemed Complete	2,042	244	0	0	2,286
Approved to Install ⁶	2,087	237	0	0	2,324
Under Review as of 12/31/19	3	12	0	0	15
Denied	0	0	0	0	0
Review Deadline Missed	1	5	0	0	6
Approval Deadline Missed	105	140	0	0	245
Scoping Meetings	0	151	0	0	0
Impact Studies	0	0	0	0	0
Facility Studies	0	0	0	0	0
Feasibility Studies	0	2	0	0	0
Fees Charged for Studies	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Unauthorized Interconnections	0	0	0	0	0

Status	Nameplate Capacity (kW ^{AC})				
	Level 1	Level 2	Level 3	Level 4	Total
Received	11,913.66	36,368.98	0	0	48,282.64
Approved	12,201.65	27,017.89	0	0	39,219.53
Denied	0	0	0	0	0

⁶ Includes 15 applications received in 2019 and approved in 2020.

EXHIBIT B

2019 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						
	0 Days (Same Day)	1-3 Days	4-6 Days	7-9 Days	10 Days	Greater than 10 Days	Total
1	66	249	2	0	0	0	317
2	9	31	3	0	0	0	43
3	0	0	0	0	0	0	0
4	0	0	0	0	0	0	0
Total	75	280	5	0	0	0	360

(ii) Reasons for Incomplete Application Data

Reasons For Incomplete Application Data ^[1]	Number of Applications
Missing or Incorrect Customer Information	31
Incorrect Inverter AC Capacity	143
Duplicate or Erroneous Submission	14
Proposed AC Inverter/System is Oversized per History	75
Wrong Application Form Used	7

(iii) Incomplete Applications Excluding Re-Submissions

Level	Number of Applications
1	24
2	3
3	0
4	0
Total	27

^[1] Screening results for interconnection applications may be deemed incomplete for more than one (or a combination of) reasons shown. Therefore, these requests do not equal the total number of application deemed incomplete as shown in table (i).

EXHIBIT C

Supplemental Interconnection Request and Application Statistics

Applications	Level 1	Level 2	Level 3	Level 4	Total
Total received and deemed complete in 2018	2,042	244	0	0	2,286
Approved to install in 2019	2,087	237	0	0	2,324
Under review as of 12/31/2018	<48>	<28>	0	0	<76>
Under Review as of 12/31/2019	3	12	0	0	15
Withdrawn prior to approval	0	23	0	0	23
Denied	0	0	0	0	0
Total	2,042	244	0	0	2,286
Applications revised after Approval to Install	76	10	0	0	86

CERTIFICATE OF SERVICE

I hereby certify that a copy of Potomac Electric Power Company's Annual Interconnection Report for 2019 was served this March 31, 2020 on all parties in Formal Case No. 1050 by electronic mail.

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A handwritten signature in blue ink, reading "Andrea H. Harper". The signature is written in a cursive style with a large, stylized 'A' and 'H'.

Andrea H. Harper