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PUBLIC

March 30, 2021

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 2020, 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/ 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, 2020 through December 31, 2020**



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 2020 (2020 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. 2020 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 2020, Pepco received and deemed complete 2,359² Level 1 requests, 275 Level 2 requests, one Level 3 requests, and one Level 4 request.

The total kWAC inverter nameplate capacity for the all requests received and deemed complete in 2020 was 69,682 kWAC. Exhibit A provides details on the interconnection requests received and deemed complete by Pepco in 2020.

b. Interconnection Requests Approved to Install

In 2020, Pepco approved 2,454³ small generator interconnection requests for installation. The total kW^{AC} inverter nameplate capacity for requests approved in 2020 was 39,288.59 kW^{AC}.

Pepco approved 2,265 Level I interconnection requests for installation in 2020, with a total inverter nameplate capacity of 13,722.50 kWAC.

The Company approved 188 Level 2 applications for installation in 2020. The total inverter nameplate capacity for all Level 2 requests approved for installation was 21,078.09 kWAC.

Pepco received and approved no Level 3 and one Level 4 approved for installation was 4,488 kWAC.

Forty-Nine Level 1 applications, 46 Level 2 applications, one Level 3 and no Level 4 applications (for a total of 96) were pending technical screening as of December 31, 2020. Exhibit A provides further details on interconnection requests approved for installation in 2020.

c. Interconnection Requests Denied

No applications were denied at any level in 2020.

² Total applications submitted and deemed complete increased 15.31% compared to 2019.

³ Includes 15 requests received in 2019. Eleven of the 15 were approved in 2020 and 4 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 99.52% of the 3,478 interconnection requests received during 2020 within the required timeframe. 28 out of 3,478 requests were not completed in the required timeframe.

b. Timeliness of Application Reviews for Approval to Install

In 2020, Pepco completed 94.4% of the 2,454⁴ Approval to installs (ATI) within the required timeframe. Fifty-Nine percent of the applications that failed to meet approval deadlines were CREF applications.

In 2020, 82 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 2020.

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 188 Community Renewable Energy Facility applications received in 2020. 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 5.6% compared to 2019.

1. Interconnection Requests Deemed Incomplete

In 2020, the Company received and reviewed 842 interconnection requests that were deemed incomplete during the completeness review and returned them to customers and contractors for revisions. Of the 842 applications deemed incomplete, 743 were Level 1 requests, 99 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 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 2020 reviewed, processed, deemed complete, approved, and unauthorized interconnections, and Exhibit B showing statistics on all incomplete requests processed.

In 2020, Pepco processed 3,478 interconnection requests (including 842 incomplete requests). This number of requests represents an 31.4% increase in interconnection requests compared to 2019.

In 2020, Pepco had no unauthorized interconnections 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, 2019, under review on December 31 2020, withdrawn prior to approval, denied and not resubmitted, and revised after approval to install.

2. Applications Withdrawn After Scoping Meeting

In 2020, 29 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 2020

In compliance with the Commission's requirement to provide a confidential listing of interconnection applications approved during the 2020 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 2,349 customer calls related to the interconnection process in 2020. Due to COVID-19, we were not in the office to take live calls. Two hundred thirty (230) calls from District customers/contractors were routed to voice mail in 2020. 229 voicemails were responded to within one business day and 1 was returned within 2 business days. 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 2020.

Distribution of Response Time to Customer Calls in 2020			
Within 24 hrs.	Greater than 24 hrs. but not exceed 48hrs	Greater than 48 hrs. but not exceed 72 hrs.	Greater than 72 hrs.
229	1	0	0

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	1.39	3.55	7.88	4.48	43.21	4.48	64.99

In 2020, Pepco issued the final authorization to operate for NEM applications in an average of 64.99 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

PHI successfully launched Connect the Grid (CTG) January 2020. Connect the Grid went live January 17, 2020. Since the go live date over 14,000 DER applications were processed through Connect the Grid. Connect the Grid is a customer facing tool where Customers, Developers and Green Power Connection Interconnection Specialist input DER applications.

Benefits of Connect the Grid include:

- Self-service tool for Customers and Developers
- Customers and developers can see real time updates regarding the status of their application through the life cycle of their DER applications
- Documents can be uploaded directly into CTG tool.
- Central repository for application status, documents, timeline and progression of an application
- Messaging capabilities between departments, while maintaining a record of the interactions
- Messaging capabilities between PHI and the Developer/Customer, while maintaining a record of the interaction

IV. Customer Education and Outreach

In 2020, PHI 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 November 12, 2020, PHI hosted an annual webinar Collaborative.

Topics included:

- Green Power Connection overview – statistics and updates
- Review of Connect the Grid benefits
- Demo of Connect the Grid
- Questions and collaboration regarding Connect the Grid
- Review of New and Important Technical Requirements
- Questions and collaboration

Recognizing the benefits of the Customer Education and outreach, PHI is continuing to host Solar and Distributed Energy Resource Collaboratives into 2021 and are implementing hosting quarterly Collaboratives. The first 2021 collaborative was held March 24, 2021

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 2,304 ATO letters to customers in 2020, a increase of 24.5% from 2020. The Company issued 98% of the Level 1 ATOs within the 20 business day timeframe for Level 1 interconnections.

EXHIBIT A

2020 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 Applications Approved to Install	(3) Total Denied Applications	(4) Total Applications Still Pending	(5) Total Incomplete Applications	(6) Total Applications Withdrawn Prior to Approval	Total Resubmissions
3,478	2,454	0	96	842	101	716

Status	Number of Interconnection Applications				
	Level 1	Level 2	Level 3	Level 4	Total
Received & Deemed Complete	2,359	275	1	1	2,636
Approved to Install ⁶	2,265	188	0	1	2,454
Under Review as of 12/31/20	49	46	1	0	96
Denied	0	0	0	0	0
Review Deadline Missed	0	28	0	0	28
Approval Deadline Missed	26	112	0	0	138
Scoping Meetings	0	0	0	0	0
Impact Studies	0	0	0	0	0
Facility Studies ⁷	0	0	1	1	0
Feasibility Studies	0	0	0	0	0
Fees Charged for Studies	\$0.00	\$0.00	\$10,000	\$10,000	\$20,000
Unauthorized Interconnections	0	0	0	0	0

Status	Nameplate Capacity (kW^{AC})				
	Level 1	Level 2	Level 3	Level 4	Total
Received	14,331.2	43,862.8	7,000	4,488	69,682
Approved	13,722.50	21,078.09	0	4,488.00	39,288.59
Denied	0	0	0	0	0

⁶ Includes 15 applications received in 2019 . Eleven were approved and four were withdrawn in 2020. Includes one L3 natural gas project and one L4 solar project...

EXHIBIT B

2020 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	136	594	13	0	0	0	743
2	14	73	7	1	0	4	99
3	0	0	0	0	0	0	0
4	0	0	0	0	0	0	0
Total	150	667	20	1	0	4	842

(ii) Reasons for Incomplete Application Data

Reasons For Incomplete Application Data ^[1]	Number of Applications
Missing or Incorrect Customer Information	482
Incorrect Inverter AC Capacity	157
Proposed AC Inverter/System is Oversized per History	114
Missing Signature/Docusign	89

(iii) Incomplete Applications Excluding Re-Submissions

Level	Number of Applications
1	79
2	23
3	0
4	0
Total	102

^[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 2020	2,359	275	1	1	2,636
Approved to install in 2020	2,265	188	0	1	2,454
Under review as of 12/31/2019	<3>	<12>	0	0	<15>
Under Review as of 12/31/2020	49	46	1	0	96
Withdrawn prior to approval	48	53	0	0	101
Denied	0	0	0	0	0
Total	2,359	275	1	1	2,636
Applications revised after Approval to Install	159	13	0	0	172

CERTIFICATE OF SERVICE

I hereby certify that a copy of Potomac Electric Power Company's Annual Interconnection Report for 2020 was served this March 30, 2021 on all parties in Formal Case No. 1050 by electronic mail.

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