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To: ElectrifyDC

Subject: OPC Data on Solar Interconnection Complaints Received between 2019-2024

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I. Background Information

Since 1975, the Office of the People’s Counsel for the District of Columbia (OPC) has served as the statutory ratepayer advocate for electric, gas, telecommunications, and, more recently, water matters in the District of Columbia. Over the past several years, OPC has received a number of solar interconnection complaints from District ratepayers who have sought to interconnect their solar systems to Pepco’s distribution system. Residents have faced a number of barriers to access, including significant interconnection fee requests and prolonged timeframe for processing of interconnection requests. OPC has reviewed the consumer complaints it has received and has performed data analysis, resulting in the trends shared herein.

II. OPC Interconnection Data Overview and Limitations

From 2019 until the present, OPS received 102 consumer complaints related to solar issues, 39 of which related to interconnection issues. Among the interconnection complaints, OPC was able to identify three main issues cited by residents.

First, the majority of interconnection complaints (71%) are related to high interconnection fees. After review, consumers have been quoted interconnection fees ranging between \$2,000 and \$104,000, with the majority of interconnection fees ranging between \$2,000 and \$15,000, as well as mostly being system sizes at or below 20kW. Most of the consumers who came to OPC and identified Pepco’s proposed interconnection fees as the issue of their complaints were seeking OPC’s assistance to gain clarity regarding the calculation of the proposed interconnection fees from Pepco. For many consumers, these additional interconnection costs

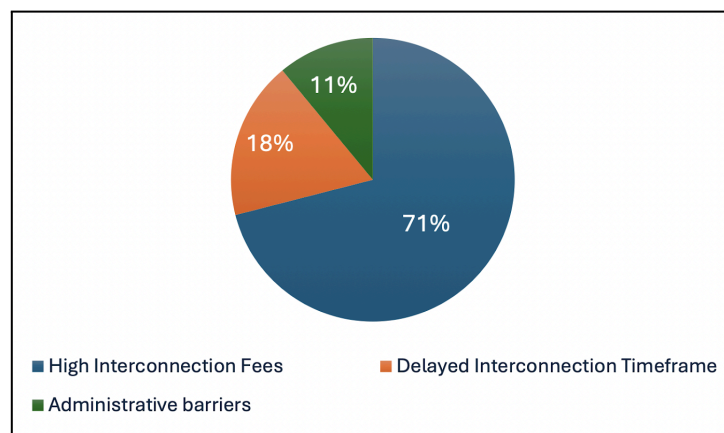
were not anticipated and, in many cases, became a barrier to interconnection resulting in some consumers being unable to move forward with their interconnection.

Second, many consumers (18%) identified delayed interconnection timeframes as the main issue with their interconnection, with reasoning including a lack of communication from Pepco and/or significant delays in communications from Pepco in processing interconnection applications. These consumers sought OPC’s assistance to communicate with Pepco regarding status updates on their interconnection applications and project status.

Lastly, a smaller number of consumers (11%) identified administrative barriers as the main issue with their interconnection, where they experienced setbacks due to requests from Pepco related to DC Municipal Regulations on interconnection requests.

This chart reflects the issue identified by consumers to OPC complaints for all of the consumer interconnection complaints received between 2019 and the present.

Chart 1: Percentage of Interconnection Complaints by Issue



Many of these complaints occurred in 2019 and 2020. OPC submits that the reasoning for this may relate to the Covid-19 pandemic and other administrative issues, as complaints related to interconnection issues have largely stagnated and have amounted to less than 5 per calendar year for years 2022, 2023, and in 2024.

OPC, however, notes that this data only reflects resolutions sought and completed using

OPC’s assistance and therefore does not include consumers who contacted OPC but ultimately chose alternative pathways to resolve their issues without OPC’s assistance, including consumers who contacted OPC and reached confidential resolutions with the respective utility company via negotiations or through the Public Service Commission.

OPC is unable to share resolutions received through negotiations or proceedings through the Public Service Commission of the District of Columbia as such results are confidential in nature. However, general trends for complaint resolutions included recalculation of proposed interconnection costs by Pepco, consumers being unable to move forward with their project due to cost barriers due to proposed interconnection costs, or consumers paying the proposed interconnection fees so as to avoid any further delays with their interconnection requests.

Table 1: OPC Solar Interconnection Complaints by Ward

<u>Ward</u>	<u>% of Complaints</u>
1	11%
2	0%
3	19%
4	15%
5	30%
6	7%
7	15%
8	4%

Conclusion

The trends identified herein reflect trends overarching trends from solar interconnection consumer complaints that OPC received between 2019 and the present.