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To: ElectrifyDC

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

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I. Background Information

The Office of the People's Counsel for the District of Columbia (OPC) serves as the statutory ratepayer advocate for electric, gas, telecommunications, and 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, a significant number of solar-related consumer complaints that OPC has received are related to interconnection issues. Of the interconnection complaints that OPC has received, there are three different issues that residents have identified. First, the majority of interconnection complaints that OPC has received 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. 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 served to be a barrier to interconnection and some consumers were unable to move forward with their interconnection requests as a result.

Second, many consumers identified delayed interconnection timeframes, 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 small number of consumers identified administrative barriers, where they experienced setbacks due to requests from Pepco related to DC Municipal Regulations on interconnection requests.

OPC notes that this data is limited and only reflects resolutions sought and completed using OPC’s assistance. 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.

III. OPC Solar Interconnection Data Analysis

OPC has reviewed the data for consumer complaints received between 2019 through the present and has identified overarching trends below.

Table 1: OPC Solar Interconnection Complaint 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%

Table 1. Percentage of consumer interconnection complaints to OPC aggregated by Ward.

Chart 1: Percentage of Solar Interconnection Complaint by Ward

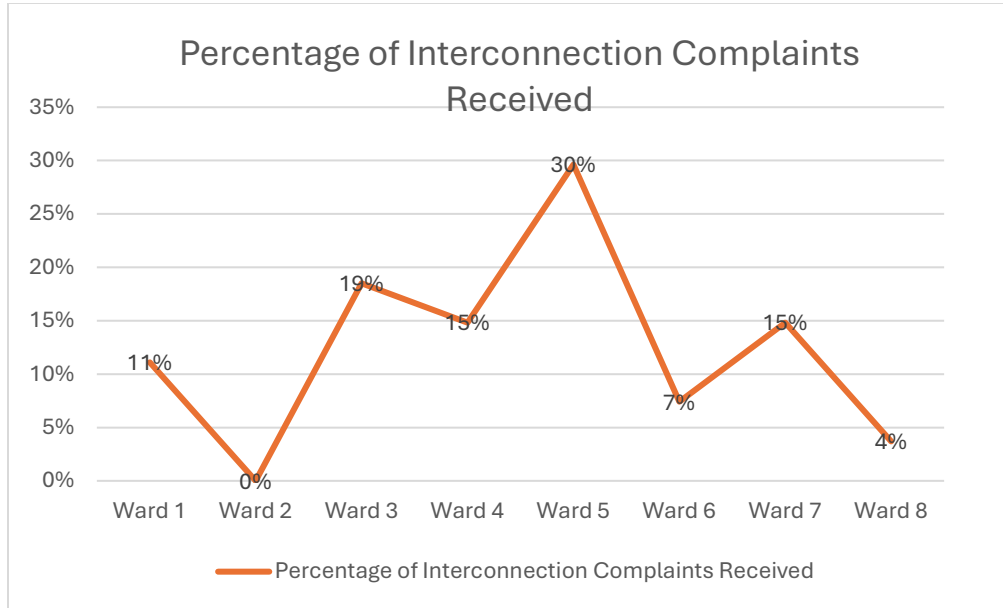


Chart 1. This chart reflects the percentage of consumer interconnection complaints to OPC aggregated by Ward. The data is the same as utilized in Table 1.

Chart 2: Percentage of Interconnection Complaint by Issue

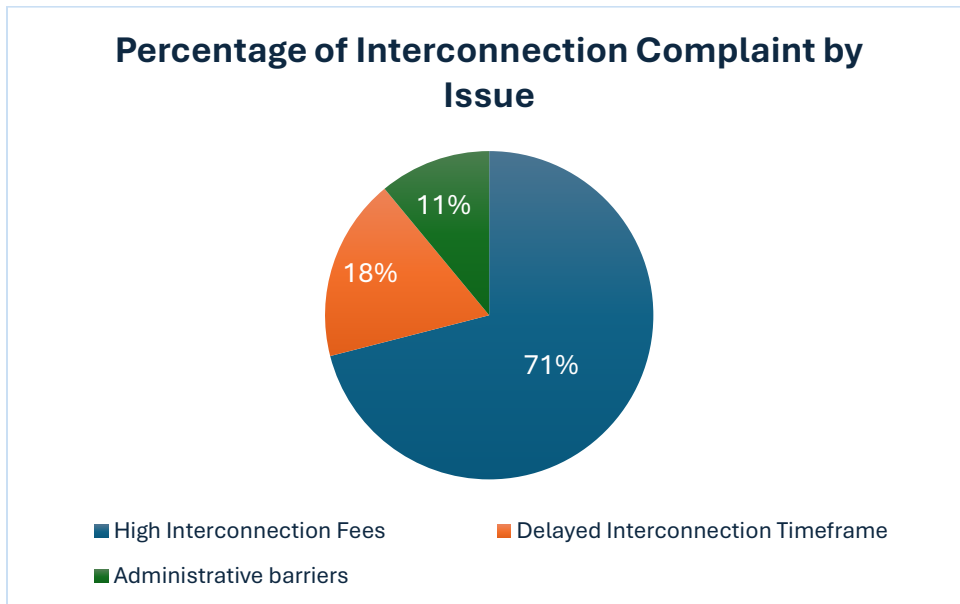


Chart 2. This chart reflects the issue identified by consumers to OPC complaints for all of the consumer interconnection complaints received between 2019 and the present.

IV. Conclusion

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