

**Matthew K. Segers**  
Assistant General Counsel  
  
EP9628  
701 Ninth Street NW  
Washington, DC 20068-0001

Office 202.428.1220  
Fax 202.331.6767  
pepco.com  
mksegers@pepcoholdings.com

**PUBLIC**

April 11, 2025

Andrew S. Johnston  
Executive Secretary  
Maryland Public Service Commission  
William Donald Schaefer Tower  
6 St. Paul Street, 16<sup>th</sup> Floor  
Baltimore, Maryland 21202

**Re: COMAR 20.50.09.14**  
**Small Generator Interconnection Report - Update**

Dear Mr. Johnston:

In compliance with COMAR 20.50.09.14 and Order No. 86990 (Condition 16(E)), attached is Potomac Electric Power Company's updated public Small Generator Interconnection Report for the year 2024. This report contains additional information for the public filing that was mentioned in the previous cover letter.

Please feel free to contact me if you have any questions regarding this matter.

Sincerely,

*/s/ Matthew K. Segers*

Matthew K. Segers

Enclosure

cc: Lloyd Spivak, Staff Counsel  
David S. Lapp, Public Counsel

# **Annual Small Generator Interconnection Report**

**Filed Pursuant to Code of Maryland  
Regulation 20.50.09.14C  
Covering Interconnection Applications  
Received Through  
December 31, 2024**

**April 1, 2025**

**Updated April 11, 2025**



## **I. Introduction**

Pursuant to Code of Maryland Regulation (COMAR) 20.50.09 [Small Generator Interconnection Standards] and 20.50.09.14 [Record Retention and Reporting Requirements], Potomac Electric Power Company (Pepco or the Company), submits its Annual Small Generator Interconnection Report for 2024 (the 2024 Annual Report). Pursuant to Condition 16(E) of Appendix A - Order No. 86990, dated May 15, 2015 – In the Matter of the Merger between Exelon Corporation and Pepco Holdings, Inc. (PHI) – the Companies agreed to provide additional information regarding Pepco’s performance on certain matters related to the interconnection process.

## **II. Annual Small Generator Interconnection Report**

### **A. Information Required by COMAR 20.50.09.14C**

COMAR 20.50.09.14, Record Retention and Reporting Requirements, requires Pepco to submit to the Commission, on April 1 of each year, a report detailing the following: (1) the total number of and 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 evaluations of interconnections requests approved and denied using any alternate process under Level 1, Level 2, Level 3, and Level 4 reviews; (3) The fuel type, or energy storage type, total number, and total nameplate capacity of small generator facilities approved in each of the following categories: (a) Net metering, (b) Emergency standby capable of operating in parallel, (c) Behind the meter load offset, (d) Combined heat and power, (e) Energy storage devices, and (f) Other; (4) The number of interconnection requests that were not processed within the deadlines established for Level 1, Level 2, Level 3, and Level 4 reviews and permission to operate notices; (5) The total number of interconnection requests denied and the reason for each denial; (6) Each application for a proposed small generator facility that received a cost estimate or incurred an actual cost of at least \$10,000 for interconnection facilities or distribution upgrades and was completed during the reporting year, which includes: (a) A list of the nameplate capacity of the proposed small generator facility; (b) Cost variance; (c) Variance percentage; and (d) If required, a detailed explanation for any small generator facility application for which the actual cost of facilities or upgrades was at least 10% greater than the cost estimate provided; (7) The number of scoping meetings held, the number of feasibility studies, impact studies, facility studies, and combined studies performed and the total fees charged for these studies; (8) For each application for a proposed small generator facility that failed to meet Level 2 criteria according to COMAR 20.50.09..10F, a list of the queue number, reason for failure to meet Level 2 criteria, if the applying requested additional review, whether the additional review was completed within 30 days, or if the applicant decided to request interconnection under level 4 criteria; (9) The current utility status and future plans and schedule for implementation of hosting capacity reporting systems or improvements to existing hosting capacity reporting systems; (10) The total number of restricted circuits and the total number of closed circuits; (11) The number of interconnection requests totaled for Level 1, Level 2, Level 3, and Level 4 that were denied due to restricted circuits and the total number that were denied due to closed circuits; (12) The number of interconnection requests for inadvertent export totaled for Level 1, Level 2, Level 3, and Level 4 that were approved, denied, or suspended due to non-compliance; (13) The number of interconnection requests for net system capacity totaled for Level 1, Level 2, Level 3, and Level 4 that were approved, denied, or suspended due to non-compliance; (14) The number of

cancelled small generator facility projects that result in interconnection costs to subsequent small generator facility projects in the same interconnection queue; (15) The number of small generator facility projects that delay payment for a distribution system upgrade until the time a first higher small generator facility project in an interconnection queue is ready to interconnect; (16) if Volt-Watt control is implemented in a utility's default utility required inverter settings profile: (a) the number of total interconnection customer complaints about smart inverter related curtailments; (b) the number of smart inverter related curtailment interconnection customer complaints resolved by utility; (c) the number of smart inverter related curtailment interconnection customer complaints resolved by customer; and (d) the number of smart inverter related interconnection customer curtailment complaints unresolved.

**In compliance with 20.50.09.14C, the Company reports:**

**(1) The total number of and nameplate capacity of the interconnection requests received, approved, and denied under Level 1, Level 2, Level 3 and Level 4 reviews**

Pepco received 4,870<sup>1</sup> interconnection requests in 2024, with a total inverter nameplate capacity of 138,823.4 kW<sup>AC</sup>. The Company received 4,615 Level 1 requests, 238 Level 2 requests, 2 Level 3 and 15 Level 4 requests. Attachment COMAR 20.50.0914C (1) provides details on the interconnection requests received in 2024.

**(2) The number of Evaluations of Interconnections requests approved and denied using any alternate process under Level 1, Level 2, Level 3 and Level 4 reviews**

Pepco currently uses Power Flow Analysis to determine whether a request would cause adverse system impacts and a waiver for this process change was granted by the Maryland Public Service Commission. Pepco approved 4,486 level 1 requests, 220 level 2, zero level 3, and 12 level 4 applications. Pepco had zero denied requests.

**(3) The fuel type, or energy storage type, total number, and total nameplate capacity of small generator facilities approved in each of the following categories (a) Net metering, (b) Emergency standby capable of operating in parallel, (c) Behind the meter load offset, (d) Combined heat and power, (e) Energy storage devices, and (f) Other**

In 2024, Pepco approved a total of 4,719 small generator facility interconnection requests with a total nameplate capacity of 125,302.9 kW<sup>AC</sup>. The Company approved for operation 4,657 Net Metering requests with the total nameplate capacity of 57,201.8, five Aggregate Net Energy Metering with Capacity of 5,110 kWc, four Emergency standby capable of operating in parallel request with 35kWc, two behind the meter offset request with the total nameplate capacity of 18,500 kW, one Combined heat and power request with the total nameplate capacity of 75kW<sup>AC</sup>, 45 Community solar facility with application Capacity of 62,803.5kWc,

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<sup>1</sup> Of the 4,870 interconnection requests received, 1,109 were deemed incomplete and were returned to the customer/contractor and 998 resubmitted. There was a total of 4,614 advanced technical screenings; 197 withdrawn before review.

- (4) **The number of interconnection requests that were not processed within the deadlines established for Level 1, Level 2, Level 3 and Level 4 review and permission to operate notices**

**Timeliness of Review for Completeness**

Pepco completed the initial review for completeness for more than 86.06% of the 4,870 interconnection requests received during 2024 within the required timeframe of five business days. Pepco issued 3,080 approvals to operate notices, 84.38% of which were within the required timeframe of 20 business days of receiving a complete Part II application.

- (5) **The total number of interconnection requests denied and the reason for each denial.**

Pepco denied zero requests to interconnect small generator facilities in 2024.

- (6) **Each application for a proposed small generator facility that received a cost estimate or incurred an actual cost of at least \$10,000 for interconnection facilities or distribution upgrades and was completed during the reporting year**

Pepco issued 24 cost estimates for a proposed small generator facility which was at least \$10,000 and completed within the year. Attachment COMAR 20.50.14.C(6) (Confidential) provides details on the cost estimates greater than \$10,000.00.

- (7) **The number of scoping meetings held, the number of feasibility studies, impact studies, facility studies, and combined studies performed, and the total fees charged for these studies**

There were two scoping meeting, zero feasibility study, zero impact study, zero facility study, and four combined studies.

- (8) **For each application for a proposed small generator facility that failed to meet Level 2 criteria according to COMAR 20.50.09.10F, a list of the queue number, reason for failure to meet Level 2 criteria, if the applying requested additional review, whether the additional review was completed within 30 days, or if the applicant decided to request interconnection under level 4 criteria.**

The Company did not identify any proposed small generator facility that needed to be evaluated.

- (9) **The current utility status and future plans and schedule for implementation of hosting capacity reporting systems or improvements to existing hosting capacity reporting systems.**

Presently, PHI has a Hosting Capacity DER Map that performs a Hosting Capacity Calculation for individual feeders. It has been implemented since 2016. In 2024 we improved our Hosting Capacity calculation methodology that allows more consistent and accurate values that allow for

more clear availability for applications. In 2025, we have plans to improve the DER map functionality, which include differentiation on Three-Phase / Single-Phase conductors, Simplified GUI for moving between DER Maps, and adding information such as Load Data, Application Activity, and Pre-App relevant data. These changes in combination for all DER maps will enable developers to make more informed decisions and more successful applications in conjunction with changes made in 2024.

**(10) Beginning April 1, 2021, a utility shall report annually for the previous year:**

**The total number of restricted circuits and the total number of closed circuits.**

As of December 31, 2024, Pepco had zero restricted circuits and zero closed circuits.

**(a) The number of interconnection requests totaled for Level 1, Level 2, Level 3 and Level 4 that were denied due to restricted circuits and the total number that were denied due to closed circuits.**

In 2024, Pepco had zero interconnection requests which were denied due to restricted circuits or closed circuits for all levels.

**(b) The number of interconnection requests for inadvertent export totaled for Level 1, Level 2, Level 3 and Level 4 that were approved, denied or suspended due to non-compliance.**

In 2024, Pepco had zero interconnection requests for inadvertent export.

**(c) The number of interconnection requests for net system capacity totaled for Level 1, Level 2, Level 3 and Level 4 that were approved, denied or suspended due to non-compliance.**

In 2024, Pepco did not have any interconnection requests that were approved, denied, or suspended due to non-compliance.

**(d) The number of cancelled small generator facility projects that result in interconnection costs to subsequent small generator facility projects in the same interconnection queue.**

In 2024, there are not interconnection requests that meet this category.

**(e) The number of small generator facility projects that delay payment for a distribution system upgrade until the time a first higher small generator facility project in an interconnection queue is ready to interconnect.**

In 2024, Pepco does not have exclusive knowledge of why a developer may be delaying project work. The Company cannot confirm if a developer is awaiting another project to connect to avoid cost, prior to moving forward with their project.

- (11) Beginning April 1, 2024, if Volt-Watt control is implemented in a utility's default utility required inverter settings profile, a utility shall also report for the electric distribution system annually for the previous year:**

- (a) Number of total interconnection customer complaints about smart inverter related curtailments.**

Pepco did not implement Volt-Watt control in its default inverter settings profile during 2024 and therefore the following reporting questions are not applicable.

- (b) Number of smart inverter related curtailment interconnection customer complaints resolved by utility.**

Not applicable.

- (c) Number of smart inverter related curtailment interconnection customer complaints resolved by customer.**

Not applicable.

- (d) Number of smart inverter related interconnection customer curtailment complaints unresolved.**

Not applicable.

- (12) Beginning April 1, 2025, an electric utility shall report exemptions to Regulation .06R of this chapter annually for the previous year, including:**

- (a) The number of interconnection requests subject to the PJM Interconnection, LLC Tariff.**

n/a – The Company has not begun implementing COMAR 20.50.09.06R and therefore has processed no exemptions.

- (b) The number of interconnection requests in an area governed by a hosting capacity upgrade plan approved by the Commission.**

n/a – The Company has not begun implementing COMAR 20.50.09.06R and therefore has processed no exemptions.

- (c) The number of interconnection requests on a dedicated primary voltage feeder that may not benefit any other interconnection customer.**

n/a – The Company has not begun implementing COMAR 20.50.09.06R and therefore has processed no exemptions.

**(d) The number of interconnection requests on a dedicated secondary voltage facility that may not benefit any other interconnection customer.**

n/a – The Company has not begun implementing COMAR 20.50.09.06R and therefore has processed no exemptions.

**(e) The number of interconnection requests on an AC distribution grid or spot network.**

n/a – The Company has not begun implementing COMAR 20.50.09.06R and therefore has processed no exemptions.

**(f) The number of interconnection requests exempted for other good cause.**

n/a – The Company has not begun implementing COMAR 20.50.09.06R and therefore has processed no exemptions.

**(g) The reason for good cause for each interconnection request exempted from Regulation .06R of this chapter.**

n/a – The Company has not begun implementing COMAR 20.50.09.06R and therefore has processed no exemptions.

**III. Per a PHI-Exelon Merger agreement, Order No. 86990, Pepco MD tracks and reports on the number of ATIs and ATOs issued within regulatory timelines.**

**Timeliness of Approval to Install**

Pepco completed 89.25% of the 4,614 Approval to Install (ATI) within the required timeframe (15 business days for Level 1, 20 business days for Level 2 and 25 days for Level 3).

**Timeliness of Approval to Operate**

Pepco'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 MD issued 3,080 ATO letters to customers and contractors in 2024. Of these, 84.38% were successfully approved within 20 business days of receiving a complete Part II application.

**Corrective Action Plan**

The Company has already identified many of the elements it expects to include in that plan and, in most cases, has already begun implementation:



- Pepco has changed the organizational structure for the Green Power Connection team, which introduces efficiencies in interconnection application processing.
- Pepco has developed a process for prioritizing the issuance of ATI for interconnection applications that require upgrades within the required 15-day timeline.
- Pepco has updated the accumulative timer within the Connect The Grid portal where all related parties would have visibility on the remaining regulatory days to submit the review results.
- Pepco has created a Dashboard for Pending Reviews to provide more visibility on the daily progress.
- Pepco established a weekly meeting to discuss the Regulatory Metrics, monitor/evaluate the progress, and apply timely corrective action as needed.

#### **IV. Community Solar Pilot Program**

In 2024, Pepco continued the Community Solar Energy Generating System pilot program for Year 7, which provides customers who are unable to participate in traditional roof mounted systems the opportunity to receive renewable energy benefits. Customers can participate by purchasing a subscription to a CSEGS and receive credits on their Pepco bill. In 2024, Pepco received 46 CSEGS pilot program applications with an aggregate nameplate capacity of 66 Megawatts for Community Solar. By 2024 year-end, Pepco had over 42MW of install community solar in operation – serving over 5,000 subscribers.

#### **V. 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 2024, 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:

- PHI Solar and DER Collaborative Webinar, March 18, 2024
- PHI Solar and DER Collaborative Webinar, August 21, 2024
- PHI Solar and DER Collaborative Webinar, December 11, 2024

The Collaborative meets to discuss solar and other DER topics relevant to the utility industry, the Company, and Pepco customers. 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.

#### **VI. Improvements to the Interconnection Process**

Pepco is continuously evaluating ways to improve the interconnection process. Pepco made the following updates to the CTG online portal:

- **Pre-Application improvement** added notifications internal team members are automatically notified regarding application ownership. This feature provides visibility for team members, empowering them to proactively identify and address any potential issues with the application. Make essential fields mandatory such as Latitude and longitude, uploading site plans and system sizes.

# PEPCO ATTACHMENTS

**20.50.09.14C -1- The total number and the name plate capacity of interconnection requests received, approved, or denied under Level 1, Level 2, Level 3, Level 4**

	Requests Received		Requests Approved		Requests Denied		
	No. Requests Received	Total Name Plate Capacity (kW) Received	No. Approved	Total Name Plate Capacity (kW) Approved	No. Requests Denied	Total Name Plate Capacity (kW) Denied	Total Processing Fees Charged
Level 1	4,615	38,300.2	4,486	37,032.9	0	0	\$60
Level 2	238	59,569.2	220	59,615	0	0	\$1,050
Level 3	2	50	0	0	0	0	\$33,100
Level 4	15	40,904	12	28,655	0	0	\$,1000
<b>Grand Total</b>	<b>4,870</b>	<b>138,823.4</b>	<b>4,719</b>	<b>125,302.9</b>	<b>0</b>	<b>0</b>	<b>\$35,210</b>

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