

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF THE DISTRICT OF COLUMBIA**

In the Matter of the Investigation of the Implementation of Interconnection
Standards in the District of Columbia

Formal Case No. 1050

INTRODUCTORY TESTIMONY

of

JASON CUMBERBATCH

on behalf of the

**OFFICE OF THE PEOPLE'S COUNSEL
FOR THE DISTRICT OF COLUMBIA**

July 21, 2015

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THE DISTRICT OF COLUMBIA
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I. INTRODUCTION

Good morning, Madam Chair, Commissioners, Staff, and today's participants.

My name is Jason Cumberbatch. I am an electrical engineer with the Office of the People's Counsel for the District of Columbia ("OPC" or "Office"). I have more than 5 years of utility engineering experience in the areas of AMI technology, energy systems testing & integration, transmission & distribution of energy systems, engineering analysis and technical support. I received a Bachelor of Science in Mechanical Engineering from Howard University in 2006.

On behalf of the People's Counsel, who is in the hearing room today, I would like to thank you for inviting the Office to appear before you today to

discuss the various issues that have emerged since the Commission in 2009 established rules for customers with on-site generation to interconnect with the Potomac Electric Power Company's ("Pepco" or "Company") distribution system and to help identify solutions thereto.

The Office is eager to participate in this proceeding as the interconnection process is the means by which consumers can transform from solely being users of electricity to being producers and sellers of electricity.

In order for this critical process to be successful, a number of components must be in place. First, there must be clear rules in place to govern this process. Second, there must be an education process that explains how the interconnection process works and a team of personnel who can answer consumers' questions and address concerns. Last, there must be a method of measuring the effectiveness of the interconnection process in order to be able to make adjustments to ensure consumers are served.

OPC is keenly aware of the interconnection issues District consumers have been experiencing with Pepco. Over the course of the past several months, Net Energy Metering ("NEM") customers have sought the Office's help with ascertaining answers to their questions about the interconnection process. To date, some of the most frequent complaints the Office has received from NEM customers are:

1. Pepco's Green Power Connection ("GPC") team has been non-responsive to their calls and emails; and
2. Confusion regarding the Company's metering and software capabilities (or the lack thereof) to calculate NEM generation, usage, the number of kWhs back to the grid, and the determination/calculation of credits for kWh generation.

As the Commission correctly noted in its July 15, 2015 Public Notice issued in this proceeding, the Office has propounded several Data Requests on Pepco to investigate these issues. Based on our analysis of the responses received from the Company to date, it appears Pepco's GPC team has been unable to consistently (1) process customer interconnection applications and clearly explain the interconnection process to customers and (2) provide sufficient avenues and methods for consumer education and awareness of the interconnection process. Furthermore, because many NEM consumers remain confused about Pepco's interconnection process, persistent confusion, coupled with GPC's poor responsiveness to its customers, contributes to the increasing customer confusion about whether their usage has increased since the installation of their solar array.

I would like to speak, in brief, about specific issues the Office has identified with Pepco's interconnection application process and customer education efforts and propose solutions for how they can be best addressed. I'll start with Pepco's interconnection application process.

II. DEFICIENCIES WITH PEPCO'S INTERCONNECTION APPLICATION PROCESS

Like the Commission, OPC finds the number of customer applications Pepco has failed to process within the Commission's prescribed deadlines and the number of incomplete interconnection customer applications wholly unacceptable. Based on the foregoing, it is readily apparent the interconnection application process must be overhauled. For example, transitioning to a digital application process would enhance the application process by making it more efficient.

Currently, Pepco requires NEM customers to complete an application by downloading it from the internet and filling it out by hand. To increase accountability and allow customers to continuously track their applications in an easy and efficient manner, the application process should be upgraded to an online system where customers can begin an online application and have the option to save their application and return to it at a later date and time in the event they do not have all the information needed to submit a complete application.

As required by the Commission's Small Generator Interconnection Rules ("DCSGIR"), Pepco uses its NEM database to report performance on the processing of interconnection requests as well as to track the Company's progress toward the annual regulatory requirements, as mandated by the Commission.

However, Pepco should consider upgrading its current NEM database to improve the tracking of NEM applications. Pepco should not only use its NEM database to capture information and track applications for small generating systems interconnected to the electric grid. The Company should also utilize it as a tracking system or “follow-up” on its current and existing NEM customers to measure, record, and analyze customer service and satisfaction. Although Pepco’s GPC team has clearly shown statistics on its NEM-related inquiries received and the type of NEM inquiries, there is no tracking system in place for resolution time/effectiveness or customer satisfaction. This should be immediately addressed as these metrics measure efficiency and reliability, which can give Pepco and the Commission some insight as to the progression, success and areas of focus in the interconnection process.

However, digitizing the application process and making better use of the NEM database is only a start. Pepco needs to improve its communication with NEM customers.

III. DEFICIENCIES IN CUSTOMER COMMUNICATION

As stated previously, the Office believes existing deficiencies with Pepco’s GPC, responsible for processing interconnection applications and disseminating information about the interconnection process, contribute to customer confusion, and discontent. Pepco has stated to OPC that as of June 16, 2015 the GPC team

has received more than 8,500 calls from customers, contractors, and other stakeholders across Pepco regions this year. Roughly one-third of these inquiries were application-status requests; another third were billing related; and the remaining third were other non-NEM related issues. In Pepco's responses to OPC's data requests, the Company stated the GPC team consists of the following 9 staff members: 1 GPC Program Manager, 1 Customer Relation Supervisor, 1 GPC Lead Technical Consultant, 1 GPC Lead Consultant, 1 Analyst, and 4 Account Coordinators. This handful of GPC staff is responsible for serving and communicating with a vital, exponentially growing sector of today's solar utility market for the District, Maryland, New Jersey, and Delaware. While the Office is sensitive to the potential revenue impact of adding additional GPC staff. In order to minimize any potential upward pressure on rates, the Office believes Pepco should consider reallocating existing staff to the GPC or making more efficient use of its current staff to communicate with NEM customers.

Now, I'd like to provide some concrete ways Pepco can improve its interconnection process, by first identifying failures regarding Pepco's GPC team.

IV. WAYS TO IMPROVE PEPCO'S INTERCONNECTION PROCESS

Currently, I believe Pepco's GPC team does not effectively and efficiently:

- Process the increasing number of interconnection applications;
- Respond to potential Interconnection customers; and

- Explain/describe and validate the interconnection process, including explaining at what stage customers are in the interconnection process, as well as providing accurate consumer education to new customers, customer billing issues and other technical issues with the interconnection process.

In addition to making more effective use of its GPC staff, Pepco needs to implement a more aggressive strategy to deliver GPC communications and address consumer confusion about net metering and the interconnection process. An effective communication program and consumer education plan are quintessential components of any successful interconnection plan. Pepco has indicated to OPC that throughout 2014 and into 2015, it is establishing a new NEM communications strategy that includes an extensive outreach plan to educate customers, contractors, stakeholders, and Pepco employees on the process for interconnecting solar and other renewable generating systems. However, the Office's review of statistics provided by Pepco reflects very minimal or poor methods of customer education. The Office believes two distinct actions should be taken by the Company.

First, the GPC team should place greater efforts on detailed and layman promotional methods for customer education on the interconnection process (*e.g.*, providing a more detailed explanation and/or additional "steps" included in the current 'Interconnection Checklist' Pepco provides to customers).

Second, GPC should again harness the power of online technology to reach consumers. For example GPC online literature, illustrations, and consumer

education should incorporate more “How To” videos and pictures that show a step & step dialogue of the application and interconnection process. The GPC team should also incorporate frequent trainings and workshops in its new communication strategy for consumers, advocacy groups, solar installers, and stakeholder agencies such as OPC, the PSC and the District Department of the Environment (“DDOE”), so each respective group is continuously informed about the interconnection process and any pertinent updates and developments.

Finally, it is imperative that Pepco immediately take steps to clarify consumers’ confusion about the capabilities of its AMI meters to record and measure net metering data.

I’d like to add that the Office reiterates its commitment to work with net metering customers, Pepco, other District agencies, and all other stakeholders to ensure that the interconnection process is streamlined and truly works for the District’s self-generating consumers.

Again, thank you Commissioners for allowing the Office to testify here today. I welcome your questions.