Considerations for Energization Timeline Tracking

October 2025

Many electric distribution utilities are receiving significant increases in applications for service, including from EV charging stations, building electrification, and new building construction. The process of connecting these customers to a utility's grid, referred to throughout this document as energization, includes all necessary actions for that customer to receive service including administrative and contracting requirements, any necessary distribution grid upgrades, and completion of the customer's individual service connection.

Energizing customers is a fundamental utility obligation, performed millions of times a year in the US. Yet many utilities (and their regulators) lack processes to monitor or manage distribution utilities' energization performance – including, for example, how long a utility takes to energize customers.[1] There are several reasons regulators may want to track energization timelines. Energization timelines that extend beyond customers' requested energization date may drive customer dissatisfaction and complaints. In states and territories with transportation or building electrification goals, regulators may want to ensure that utilities' energization processes are aligned with those goals. Or utility customers may similarly be facing regulatory obligations that are driving energization needs, and regulators should ensure that a utility's actions don't inhibit the customer's compliance. Regulators may also wish to establish targets and incentives or enforcement mechanisms to drive improved utility performance.

Tracking Timelines – Utilities collect and report timeline data	Example: average, median, and maximum timelines
Setting Targets – Regulators set targets for energization timelines utilities are expected to achieve	Example: average timelines <150 days, maximum timelines <300 days
Creating Incentives – Regulators incentivize utilities to improve their timelines	Example: 5 basis points added to approved ROE for meeting an average timeline of <150 days

Irrespective of how regulators may choose to use energization timeline data, as an initial matter, such data should be tracked. That which is not measured cannot be managed. The remainder of this document discusses relevant questions and considerations for regulators setting energization timeline tracking requirements for the electric utilities they regulate.

[1] In contrast, generation interconnections and transmission-voltage customer energization receive a disproportionate level of regulator attention.

What energization criteria do you want to track?

At the outset of a tracking regime, regulators should decide how to segment customer energization timelines for measurement purposes. Lumping all customers together for purposes of tracking energization timelines will probably not yield useful data. Instead, for example, regulators may choose to apply tracking by:

- Customer rate class;
- End use, e.g., for EV charging, buildings, etc.;
- Geography, e.g., for applications in certain towns or counties

Targeted tracking may be useful where there are known issues affecting a particular group of customers, and the intent is to focus attention on addressing those issues. Broader tracking, or tracking of all service application timelines, may be more appropriate when a wider array of customers across customer types are experiencing extended energization timelines. Widespread tracking can also be useful for regulators and utilities to establish a baseline understanding of whether energization timelines are a problem for any customers and how those problems may be distributed across customer types.

Regulators can also require utilities to track across several customer types, and to collect and share data on each customer's characteristics. This can be useful for investigating the particular causes of extended timelines for a customer type. For example, EV charging station developers may be experiencing energization timelines significantly longer than other commercial customers in the same customer class with a similarly sized capacity request. This could suggest that it is not the scale of the grid capacity requested that is causing the extended timeline, but potentially an application requirement unique to EV charging.

What timeline are you tracking?

Starting the Clock

Regulators must decide on the relevant time to start the clock for purposes of timeline tracking. Reasonable starting points could be the date of submission of the service application, or the date that application is deemed complete by the utility. Starting the clock on the date of submission encourages utilities to process applications in a timely manner but may also encourage customers to submit incomplete applications to start their energization clock as soon as possible. On the other hand, starting the clock once a utility finds an application to be complete incentivizes customers to submit high quality applications from the start, but may allow a utility to drag its feet in initial application processing because that time is not subject to tracking.

Recommendation: *Regulators should begin by tracking timelines from the date applications are submitted to allow for comprehensive information collection on how quickly utilities process applications. To the extent they consider implementing incentive mechanisms, regulators may prefer to base these off the date of completed applications to avoid misaligning interests between the utility and customer.*

An additional wrinkle to this question is the treatment of any pre-application process. In some utility territories, customers have the option of submitting pre-application information to the utility, and/or requesting the utility analyze the available grid capacity at a site before the

customer submits a full application. Regulators may exclude these steps from tracked timelines because they are optional, or may choose to include them if they are widely used and are a common part of the interconnection process, or if the regulator is seeking to understand the impact of pre-application steps on the total timeline.

Single timeline versus step-by-step

The simplest timeline to track is a single timeline that covers the whole energization process, which may be paired with a single timeline target, e.g., 150 days from the date of application to the date the customer can energize their equipment. More complex frameworks may track specific steps in the energization process and set corresponding targets, e.g., 10 days to process applications, 20 days for a service determination, 20 days for engineering and design, etc.

One benefit of a single-timeline framework is the relative ease of implementation, particularly for those utilities that may not have the software systems in place to collect and report more detailed information. Another benefit is that it allows utilities the flexibility to find and address inefficiencies wherever they may lie. For example, a utility may find it can shorten energization timelines the most by focusing excess resources on the processing of applications, while putting minimal additional effort into engineering work. This structure is also most closely aligned with the typical customer's desire for a fast energization process regardless of the pace of the individual steps to get them service.

In contrast, step-by-step timelines can give regulators greater insight into the specific parts of the process that are slowing customers' energization, and greater control over where utilities must focus their attention to accelerate it. This can be more useful when regulators have a clear understanding of whether and how a utility's energization process is delaying customer's energization, or when a utility has already shown an unwillingness to address known issues causing delays. But step-by-step timelines can make it more difficult to compare timelines across utilities (where regulators oversee multiple utilities), as each utility is likely to have a unique way of defining and implementing each part of the interconnection process.

Recommendation: *Regulators should start with simpler end-to-end timelines, and subsequently consider developing a uniform framework of the steps in the energization process that would allow for consistent step-by-step timeline tracking across utilities.*

Utility and customer responsibilities

The energization process includes separate steps that are the responsibility of the utility and the customer. The question for regulators is which of these steps to include. They may, for example, choose to track a single timeline for all steps in the energization process, track only steps within the utility's control, or track customer and utility steps in separate timelines.

Similar to the benefits of a single timeline discussed above, applying timelines to both utility and customer responsibilities has the benefit of greater simplicity, as the clock only starts and stops once. And again, this structure is more closely aligned with customers' interest in faster energization generally. Tracking both utility and customer responsibilities also recognizes that things not within a utility's exclusive control may still be subject to their influence. For example,

customers may be taking longer than expected to review and approve their utility's engineering and design plan before permitting and construction can start. While this task is the customer's responsibility, the utility may also have a role in influencing its timeline. Delays may be partially attributable to the clarity of the utility's communications with the customer, or the format of the plan itself. Excluding the customer's review from the timeline would obscure the utility's relevant performance, and would miss opportunities to improve overall outcomes.

Tracking those specific steps within the utility's control is more complex, as it requires clear delineation of each step in the energization process and who is responsible for that step. This may be a useful exercise, however, particularly where the utility has yet to clearly articulate what the energization process entails. Utilities may also be more open to timeline tracking that focuses on those steps under the utility's control, particularly when their regulator pairs the tracking requirement with targets or incentives. Lastly, focusing timelines on utility responsibilities may be appropriate where the regulator already knows that it is the utility, or even particular steps within the utility process, that are causing energization delays.

Recommendation: *At minimum, regulators should track a single end-to-end timeline inclusive of utility and customer responsibilities. As they add complexity over time, and potentially consider creating incentives based on these timelines, they can add more granular, utility-responsibility tracking if desired.*

Treatment of upstream upgrades

For every utility, some share of customers' service applications will require system capacity upgrades such as new or upsized circuits, transformers, and substations. While necessary to serve the customer who triggered the capacity deficiency, not all distribution grid upgrades add one customer's worth of capacity at a time.[2] The question for regulators is how to treat these upgrades that are necessary for a customer's energization but built to serve the needs of several new or upgrading loads in the future.

One option for regulators is to separate capacity upgrades from energization timelines. This can be done by simply stopping the clock when a utility identifies a capacity upgrade need as part of the customer energization process and restarting it when the utility completes the upgrade and the energization process can continue. This may be most relevant when regulators are interested in the energization process itself, rather than the full timeline on which customers receive service.

Regulators may also choose to track a separate timeline for capacity upgrades, stopping the energization timeline clock when the utility identifies a capacity upgrade need and starting the capacity upgrade clock. When the utility completes the upgrade, the capacity upgrade clock stops and the energization timeline clock restarts. A benefit of this method is that it adds focus on how

[2] Some system upgrades, such as service drops and service transformers are typically sized to serve a single interconnection request. Others, such as circuit extensions and upgrade, can be sized to a single customer or multiple. And some, such as new or upgrade substations, will almost always be sized for to serve additional growth beyond that of a single customer.

long utilities take to complete system upgrades, which can be particularly important for utilities where such upgrade needs frequently accompany energization applications.

Finally, regulators may prefer to simply include capacity upgrades within the energization timeline. This will result in more variation in timelines—two similar projects may see significant differences in their total energization timeline if only one triggers a capacity upgrade need—but this framework is more reflective of the customer experience. This option can also incentivize utilities to be more forward-looking in identifying and completing capacity upgrades needed to serve new and/or anticipated load. This is in contrast with tracking capacity upgrades separately, which can encourage utilities to shorten construction timelines but not necessarily to begin that construction in advance of customer applications.

Recommendation: *Given its simplicity and connection to the customer experience, regulators should, at minimum, track total end-to-end timelines that include any required grid upgrades. As regulators and utilities gain experience with the tracking process, they should consider what additional complexities are needed to track and target specific problem areas, but should continue tracking upgrade-inclusive timelines regardless.*

Additional Considerations

Customer and utility reporting

As part of setting timeline tracking requirements, regulators must decide how they want to utilities to report the data they collect. Relevant questions include the reporting interval (e.g., quarterly or annual reporting), whether the utilities must share only summary statistics (e.g., average timeline for each customer category) or the underlying data used to create those statistics, and what portions of reported data will be made public.

Regulators may also decide to create a customer reporting mechanism for customers dissatisfied with their energization process. These reports may go through the utility or directly to the regulators or other public entity, and can serve as an additional source of information on the cause of extended energization timelines.

Bridging solutions

Several utilities have proposed or begun offering bridging solutions that can energize customers faster than would be possible through the traditional energization process but may involve a temporary reduced level of service. These are typically used when the customer's energization would require an upstream grid upgrade with an extended construction timeline. Examples include flexible interconnection programs and mobile battery storage units. Where utilities offer bridging solutions, regulators must consider how to account for their use in timeline tracking. For example, where a customer agrees to a temporary flexible interconnection, is the date of energization when the customer receives this temporary service or when they later receive service at their full requested capacity?