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Fwd: Comments

1 message

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To: Zugeily Colón Del Valle <zcolon@energia.pr.gov>

Mon, Feb 5, 2018 at 9:39 AM

Para registrar y circular.

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----- Forwarded message -----

From: **Kevin Shockey** <shockeyk@gmail.com>
Date: Sun, Feb 4, 2018 at 12:24 PM
Subject: Comments
To: comentarios@energia.pr.gov

Re: CEPR-MI-2018-0001
Proposed Regulations on Microgrid Development

From: Kevin W. Shockey
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To Whom It May Concern:

I'm sorry I missed the original call for comments, because I had neither power or Internet during that time period. First, I applaud the commission on moving quickly to address this gap in power generation need for the citizens of Puerto Rico. I have read the proposed regulations and, in general, everything looks very promising.

I am retired Software Development Director with a Masters degree in Computer Science. I hope that my experience and preparation may be of service during these turbulent and trying times. I am, unfortunately not as knowledgeable of the energy domain, if it uses a computer I understand it.

I have 3 main concerns that I did not see addressed:

1. Telecommunications connectivity is probably the grossest oversight, with the little time I had for research, all micro-grid implementations require real-time monitoring and management systems. As these grids proliferate, it seems inevitable that we will need to connect the larger grids together. And so on.

In addition, if these are systems which are connected to the main power grid, then how will the central power provider know what is their status or active power generation capability within this distributed system?

2. Very closely related, but separate is the extensive amount of reporting that is contained in the proposed regulations. Since none of this reporting exists today, one should look carefully on what are the implications of excessive amount of paper reporting. As mentioned, only a sophisticated power management system can handle the real-time management and distribution needs of a multi-user micro-grid. Many of these systems already include internal reporting systems. There must be standards to establish the electronic communication between micro-grid power systems. The effective collection and aggregation of micro-grid reports will be one of the few measurements to see overall micro-grid deployment. However, without a required connectivity aspect of these new regulations then attempting to urge this new technology into adoption and then throttling it with excessive reporting seems counter-productive and infeasible.

3. Finally, while I understand that the costs and responsibilities for all micro-grids are outside of the scope of the regulations, I wonder if there isn't already Free Libre Open Source Software (FLOSS) that might help ease implementations. Again, with such little time, I'm not sure what is out there, but stimulating the research and deployment of FLOSS solutions for micro-grid operators might improve the adoption rate.

Overall, I believe that Puerto Rico must move to distributed power generation system which merges local, regional, and national power distribution capabilities. Due to Maria, we've seen the risks involved with a centralized power generation/transmission over long haul distribution systems. With these new regulations, Puerto Rico will move away single points of failure. Unfortunately, it without telecommunications connectivity they will become a collection of localized multipoint failures. The Internet provides an excellent model to consider if the goal is to link together this collection of new power generation systems.

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Kevin Shockey

Artist, Scientist, Activist

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