

GOVERNMENT OF PUERTO RICO  
PUBLIC SERVICE REGULATORY BOARD  
PUERTO RICO ENERGY BUREAU

NEPR

Received:

Nov 19, 2019

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IN RE: REGULATION ON WHEELING

CASE NO.: NEPR-MI-2018-0010

SUBJECT: Request for Comments

**To the Honorable Energy Bureau:**

Comes now Sunrun, to submit additional comments regarding the above captioned matter.

**Third Additional Comments**

As Sunrun has expressed before the aggregation of residential solar-plus-storage systems into a “*virtual power plant*” or “VPP” provides a multitude of benefits to the grid including obviating or reducing, the need for new peaker plants. The benefits of aggregated solar-plus-storage systems also include distribution and transmission cost reductions, energy and wholesale market cost reductions, increased renewable energy integration, resource adequacy, system-level peak capacity and ramping services, fast-responding dispatches filling the need for spinning reserves, automated inverter-based response to frequency deviations, peak capacity in localized areas reducing the need for transmission capacity in standard or contingency operations, for example in a “mini-grid architecture”, peak capacity on the distribution grid (coincident or non-coincident with system peak), reducing strain or investment on distribution in standard or contingency operations, distribution services including voltage management, neighborhood and site-level resiliency, others. VPPs can be managed to provide fundamentally the same services that can be provided by individual larger energy installations sited on the grid.

Sunrun reaffirms its prior comments and adds the following: this Honorable Energy Bureau’s current definition of “Electric Service Company” under Regulation 8701 refers to ‘any natural or legal person that **generates** electric power through the use of fossil fuels or renewable energy sources for sale to PREPA or any other electric service company in accordance with a power purchase agreement **and** any natural or legal person that offers **electric power generation for sale in Puerto Rico through distributed generators that are interconnected to the PREPA power grid with an**

**aggregate capacity of one megawatt (1 MW) or more; and** any natural or legal person that that carries out or offers electric power transmission (wheeling) service.’ (Emphasis added.)

Regulation 8701’s definition is sufficient and future-proof for any VPP to provide energy services (including provision of energy itself) directly or via wheeling and the proposed regulation should reflect current law.

Past distinctions between scales -so called “utility scales” versus distributed and/or smaller scale solar plus storage- are being progressively erased today, and without any environmental/land use costs. There are efficient ways to achieve high penetration of solar plus storage by taking full advantage of Puerto Rico’s ample flat roof resource in governmental as well as private sites. The environmental, land-use, economic and societal benefits are self-evident, and truly further the binding pro distributed solar public policy in force under Act 17/2019. Additional regulatory categories with superior burdens that do not necessarily incentivize these clean and smart distributed solar plus storage technologies should be avoided, or strictly limited to fossil plants.

Again, our thanks for this valuable opportunity to comment.

In San Juan, Puerto Rico, today November 18th, 2019.

**Respectfully submitted,**  
[signed/ *Javier Rúa-Jovet*]

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