

**GOBIERNO DE PUERTO RICO  
JUNTA REGLAMENTADORA DE SERVICIO PÚBLICO  
NEGOCIADO DE ENERGÍA DE PUERTO RICO**

**NEPR**

**Received:**

**May 12, 2021**

**12:54 PM**

**IN RE:** ENMIENDAS A CONTRATO DE  
COMPRAVENTA DE ENERGÍA:  
PROYECTO NO-OPERACIONAL  
(XZERTA-TEC SOLAR I, LLC)

**CASO NÚM.:** NEPR-AP-2021-0002

**ASUNTO:** Cumplimiento de Orden dictada el  
11 de mayo de 2021.

**MOCIÓN EN CUMPLIMIENTO DE ORDEN**

AL HONORABLE NEGOCIADO DE ENERGÍA:

COMPARECE la Autoridad de Energía Eléctrica de Puerto Rico a través de la representación legal que suscribe y muy respetuosamente expone y solicita:

El 17 de marzo de 2021, la Autoridad de Energía Eléctrica de Puerto Rico (la “Autoridad”) radicó ante el Negociado de Energía de la Junta Reglamentadora del Servicio Público de Puerto Rico (el “Negociado de Energía o “Negociado”) su *Petición de Aprobación a Enmiendas de Contrato de Compraventa de Energía Renovable con Xzerta Tec-Solar I* (la “Petición de Aprobación”). Mediante la Petición de Aprobación, la Autoridad solicitó al Negociado que apruebe la enmienda al acuerdo de operación o compraventa de energía (PPOA, por sus siglas en inglés) con *Xzerta Tec-Solar I* (“Xzerta”) (el “Acuerdo Enmendado”).

El 11 de mayo del 2021, el Negociado de Energía emitió *Resolución y Orden* (la “Orden”), mediante la cual aprobó el Acuerdo Enmendando sujeto a varias condiciones, y a su vez, ordenó a la Autoridad a presentar el Apéndice I (MTRs) del Acuerdo Enmendado, para su evaluación y aprobación, en o antes de cinco (5) días, contados a partir de la notificación de la Orden.

La Autoridad en cumplimiento de Orden presenta el Apéndice I del Acuerdo Enmendado y titulado *Minimum Technical Requirements for Interconecetion of Photovoltaic (PV) Facilities*. Exhibit A.

POR TODO LO CUAL, se solicita al Negociado de Energía que acepte la presente Moción y determine que la Autoridad ha cumplido con la Orden.

RESPETUOSAMENTE SOMETIDO.

En San Juan, Puerto Rico, este 12 de mayo de 2021.

/s Katuska Bolaños Lugo  
Katuska Bolaños Lugo  
kbolanos@diazvaz.law  
TSPR 18888

/s Joannely Marrero Cruz  
Joannely Marrero Cruz  
[jmarrero@diazvaz.law](mailto:jmarrero@diazvaz.law)  
TSPR 20014

DÍAZ & VÁZQUEZ LAW FIRM, P.S.C.  
290 Jesús T. Piñero Ave.  
Oriental Tower, Suite 80  
San Juan, PR 00918  
Tel. (787) 395-7133  
Fax. (787) 497-9664

Exhibit A

# MINIMUM TECHNICAL REQUIREMENTS FOR INTERCONNECTION OF PHOTOVOLTAIC (PV) FACILITIES

The Seller shall comply with the following minimum technical requirements:

## 1. VOLTAGE RIDE-THROUGH:

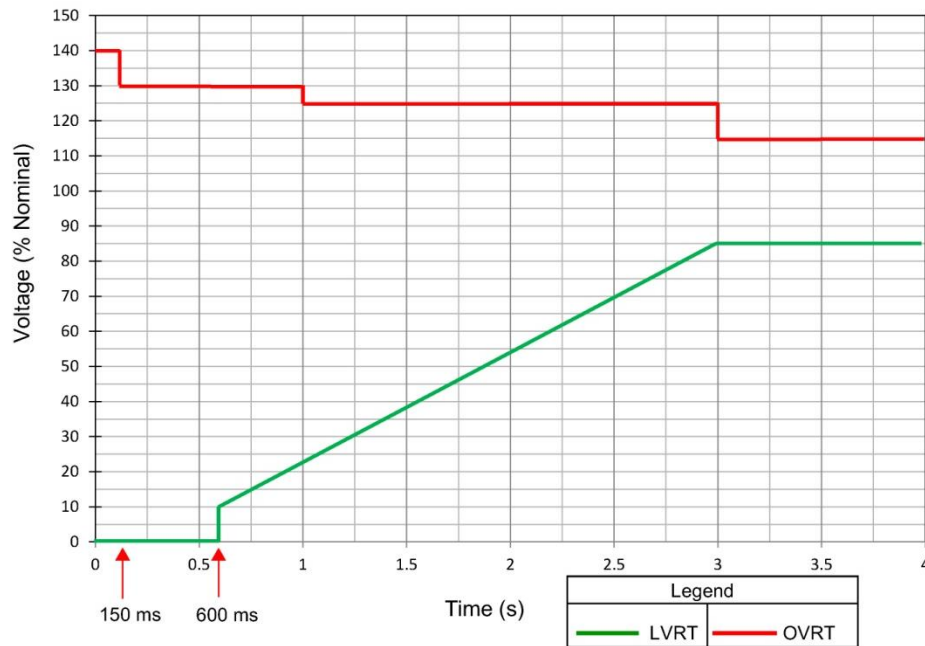


Figure 1 Voltage Ride-Through Requirements

### a. PREPA's Low Voltage Ride-Through (LVRT) Requirements:

- i. From Figure 1, PREPA requires all generation to remain online and be able to ride-through three phase and single phase faults down to 0.0 per-unit (measured at the point of interconnection), for up to 600 ms.
- ii. All generation remains online and operating during and after normally cleared faults on the point of interconnection.
- iii. All generation remains online and operating during backup-cleared faults on the point of interconnection.

iv. During the low voltage fault conditions, the PV facility shall operate on reactive current injection mode. This mode of operation shall be implemented with a reactive current droop characteristic which shall have an adjustable slope from 1 to 5%. A dead band of 15 % is required.

b. PREPA’s Overvoltage Ride-Through (OVRT) Requirements:

i. PREPA requires all generation to remain online and able to ride-through symmetrical and asymmetrical overvoltage conditions specified by the following values illustrated in Figure 1:

Overvoltage (pu)	Minimum time to remain online
1.4 – 1.3	150 ms
1.3 – 1.25	1 s
1.25 – 1.15	3 s
1.15 or lower	indefinitely

## 2. VOLTAGE REGULATION SYSTEM (VRS)

Constant voltage control shall be required. Photovoltaic System technologies in combination with Static Var Controls, such as Static Var Compensators (SVCs) and STATCOMs are acceptable options to comply with this requirement. A complete and detailed description of the VRS control strategy shall be submitted for evaluation.

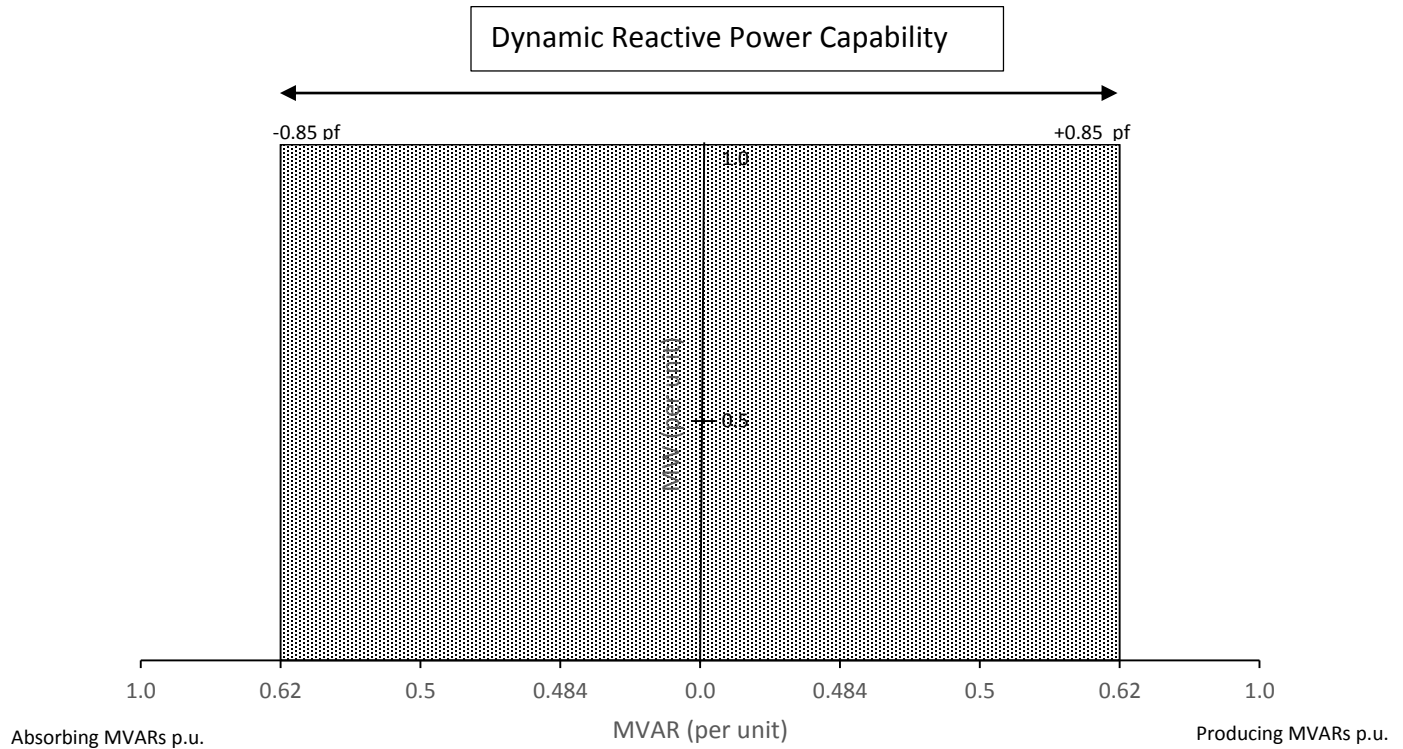
- a) Photovoltaic Facilities (PVF) must have a continuously-variable, continuously-acting, closed loop control VRS; i.e. an equivalent to the Automatic Voltage Regulator in conventional machines.
- b) The VRS set-point shall be adjustable between 95% to 105% of rated voltage at the Interconnection Facility (connection to PREPA TC, sectionalizer). The VRS set-point must also be adjustable by PREPA's Energy Control Center via SCADA.
- c) The voltage regulation at the Interconnection Facility (connection to PREPA TC or sectionalizer) shall be based in direct measurement of the Interconnection Facility (connection to PREPA TC or sectionalizer) voltage. Line drop compensation or similar strategies shall not be permitted.
- d) The VRS shall operate only in a voltage set point control mode. Controllers such as Power Factor or constant VAR are not permitted.
- e) The VRS controller regulation strategy shall be based on proportional plus integral (PI) control actions with parallel reactive droop compensation. The VRS Droop shall be adjustable from 0 to 10%.
- f) At zero percent (0%) droop, the VRS shall achieve a steady-state voltage regulation accuracy of +/- 0.5% of the controlled voltage at the Interconnection Facility (connection to PREPA TC or sectionalizer).
- g) The VRS shall be calibrated such that a change in reactive power will achieve 95% of its final value no later than 1 second following a step change in voltage. The change in reactive power should not cause excessive voltage excursions or overshoot. If a voltage overshoot is generated during a change in reactive power its value shall be less than 1%.
- h) The generator facility VRS must be in service at any time the PVF is electrically connected to the grid regardless of MW output from the PVF.
- i) The VRS dead band shall not exceed 0.1%.

### 3. REACTIVE POWER CAPABILITY AND MINIMUM POWER FACTOR REQUIREMENTS

The total power factor range shall be from 0.85 lagging to 0.85 leading at the Interconnection Facility (connection to PREPA TC or sectionalizer). The reactive power requirements are necessary to provide support to the system operation based on the voltage profile and reactive power needs. . The intent is that a PVF can ramp the reactive power from 0.85 lagging to 0.85 leading in a smooth continuous fashion at the Interconnection Facility (connection to PREPA TC or sectionalizer).

The +/- 0.85 power factor range should be dynamic and continuous at the Interconnection Facility (connection to PREPA TC or sectionalizer). This means that the PVF has to be able to respond to power system voltage fluctuations by continuously varying the reactive output of the plant within the specified limits. The previously established power factor dynamic range could be expanded if studies indicate that additional continuous, dynamic compensation is required. It is required that the PVF reactive capability meets +/- 0.85 Power Factor (PF) range based on the PVF Aggregated MW Output, which is the maximum MVar capability corresponding to maximum MW Output. It is understood that positive (+) PF is where the PVF is producing MVar and negative (-) PF is where the PVF is absorbing MVar.

This requirement of MVar capability at maximum output shall be sustained throughout the complete range of operation of the PVF as established by Figure 2. The MVar capability shall also be sustained throughout the complete Interconnection Facility (connection to PREPA TC or sectionalizer) voltage regulation range (95% to 105% of rated voltage at the Interconnection Facility).



**Figure 2 Reactive Power Capability Curve**

#### 4. SHORT CIRCUIT RATIO (SCR) REQUIREMENTS:

Short Circuit Ratio values (System Short Circuit MVA at POI/PV Facility MVA Capacity) under 5 shall not be permitted. The Seller shall be responsible for the installation of additional equipment, such as synchronous condensers, and controls necessary to comply with PREPA's minimum short circuit requirements.

#### 5. FREQUENCY RIDE THROUGH (FRT):

- 57.5 - 61.5 Hz      No tripping (continuous)
- 61.5 - 62.5 Hz      30 sec
- 56.5 - 57.5 Hz      10 sec
- < 56.5 or > 62.5 Hz      Instantaneous trip



## 6. FREQUENCY RESPONSE/REGULATION:

PV facility shall provide an immediate real power primary frequency response, proportional to frequency deviations from scheduled frequency, similar to governor response. The rate of real power response to frequency deviations shall be similar to or more responsive than the droop characteristic of 3-5% range used by conventional generators. PV facility shall have controls that provide both for down-regulation and up-regulation. PV technologies, in combination with energy storage systems such as, but not limited to battery energy storage systems (BESS), and flywheels are acceptable options to comply with PREPA's frequency response and regulation requirements.

The PV facility response shall be proportional to the frequency deviation, based on the specified 3-5% range droop characteristic. The droop shall be configurable from 3% to 5% in steps of 0.5% (3.0%, 3.5%, 4.0%, 4.5%, 5%). The frequency response dead band shall not exceed 0.02%. For large frequency deviations (for example in excess of 0.3 Hz), the PV facility shall provide an immediate real power primary frequency response of at least 10% of the maximum AC active power capacity (established in the contract). The time response (full 10% frequency response) shall be less than 1 second. Frequency response shall not be limited by, and shall be decoupled from, the ramp rate control. The frequency response of the facility shall be continuously in operation, even during ramp rate events. After the two decoupled functions are added together, the facility shall be able to simultaneously comply with both requirements.

If energy storage systems are utilized to comply with the frequency regulation requirements, and during a disturbance the system frequency stays below 59.7 Hz, the facility frequency response shall be maintained for at least 9 minutes. After the ninth minute the real power primary frequency response shall not decrease at a ramp rate higher than 10% of the maximum AC active power capacity per minute. The energy storage systems utilized to comply with the frequency regulation requirement shall be designed based on a storage capacity equivalent to at least 9.5 minutes of the 10 % AC contracted capacity measured at the Interconnection Facility (connection to PREPA TC or sectionalizer) for downward frequency events, and a similar amount for upward frequency events. This represents an equivalent of 9 minutes full participation, plus one minute ramp down complying with the ramp rate requirement. This energy will be used on a continuous basis for regulation against frequency deviations. During periods of time were the energy storage system utilized to comply with the frequency regulation requirement is completely charged (cannot absorb

more power), the PV inverters will assume the responsibility of the upward frequency events. If the energy available for frequency regulation is drained, the function shall be restored in a time period less than 10 minutes and with at least 95% of the energy capacity restored. The energy charging process shall not affect the ramp rate control requirement or the frequency regulation of the grid.

The operational range of the frequency response and regulation system shall be from 10% to 110% of the maximum AC active power capacity (established in the contract). The PV facility power output at the Interconnection Facility (connection to PREPA TC or sectionalizer) shall not exceed the maximum AC active power (established in the contract) except to comply with the frequency response requirement.

## 7. RAMP RATE CONTROL:

Ramp Rate Control is required to smoothly transition from one output level to another. The PV facility shall be able to control the rate of change of power output during some circumstances, including but not limited to: (1) rate of increase of power; (2) rate of decrease of power; (3) rate of increase of power when a curtailment of power output is released; and (4) rate of decrease in power when curtailment limit is engaged. A 10 % per minute (0.1667 % per second) rate (based on AC contracted capacity) limitation shall be enforced. This ramp rate limit applies both to the increase and decrease of power output and is independent of meteorological conditions. The ramp rate control tolerance shall be +10%.

The energy storage system utilized to comply with the ramp rate control requirement shall be designed based on a minimum storage capacity equivalent to 25 minutes of the 30 % AC contracted capacity measured at the Interconnection Facility (connection to PREPA TC or sectionalizer). The minimum nominal power output capacity of the energy storage system utilized to comply with the ramp rate control requirement shall be 30% of AC contracted capacity measured at Interconnection Facility (connection to PREPA TC or sectionalizer); and for at least one (1) minute, a minimum effective power output capacity of 45% of AC contracted capacity measured at the Interconnection Facility (connection to PREPA TC or sectionalizer). The transition from effective power output capacity to

nominal power output capacity shall not exceed the ramp rate requirement of 10% per minute.

The Frequency Response/Regulation and Ramp Rate Control functions shall be decoupled, continuously in operation and the facility shall be able to comply simultaneously with both requirements, while the PV facility is generating and injecting power to the grid. This means that the energy storage system shall include, as a minimum: 10% of the contracted capacity for Frequency Response/Regulation for at least 9.5 minutes (see section 6 for details) and 30% of contracted capacity for Ramp Rate Control for at least 25 minutes. The energy storage system shall also be able to provide a minimum effective capacity of 45% of the contracted capacity for at least one (1) minute at the Interconnection Facility (connection to PREPA TC or sectionalizer). Therefore, the minimum acceptable capacity for the energy storage system is a total combined size of 40% of contracted capacity, and for at least one (1) minute, the system has to have an effective capacity of 45% of the contracted capacity.

Rates of change in active power at the PV facility's Interconnection Facility (connection to PREPA TC or sectionalizer) in excess of the 10 % per minute rate requirement caused by the loss of generating resource (solar irradiance) that require more than the minimum storage capacity defined in this MTRs document, will not be considered in non-compliance with the ramp rate control requirement. Therefore, if the ramp is controlled within the limits specified in the requirement, or if the storage system cannot control the ramp rate because it is outside of its minimum required capabilities, but performs as specified, the PV facility will not be considered in non-compliance. However, if the energy storage system cannot control the ramp rate as required because does not perform according to at least with the minimum required capabilities specified in this MTRs document , the PV facility will be considered in non-compliance.

## 8. AUTO-CURTAILMENT

The Seller shall implement an auto-curtailment strategy for the PV facility to address and compensate deficiencies that can affect the facility compliance with the MTRs. Some of the conditions to apply auto-curtailment are:

- a. A reduction on the reactive power capacity of the facility (by example due to inverters out of service, any other condition that can reduce the required reactive power capacity of the facility).
- b. A reduction in the active power capacity of the storage system (by example loss of some of the battery strings, a BESS inverter out of service, any other condition that can reduce the required active power capacity of the energy storage system)
- c. Loss of the Interconnection Facility (connection to PREPA TC or sectionalizer) readings used for the different controls (voltage, frequency, ramp, etc.) of the facility. This can happen due to a malfunction of the equipment used for the Interconnection Facility (connection to PREPA TC or sectionalizer) readings. In this case the curtailment should be to zero.
- d. A fault in the Voltage Control, Frequency Response Control, Ramp Rate Control. In this case the facility should be curtailed to zero output.
- e. Any other condition not mentioned here but that based in the facility design can cause a non-compliance with the MTRs.

A complete and detailed description of the auto-curtailment strategy shall be submitted for evaluation.

## 9. POWER QUALITY REQUIREMENTS:

The Seller shall address, in the design of their facilities potential sources and mitigation of power quality degradation prior to interconnection. Design considerations should include applicable standards including, but not limited to IEEE Standards 142, 519, 1100, 1159, and ANSI C84.1. Typical forms of power quality degradation include, but are not limited to voltage regulation, voltage unbalance, harmonic distortion, flicker, voltage sags/interruptions and transients.

## 10. POWER MANAGEMENT

PV facility shall provide adequate technology (communicating technology and the corresponding control equipment) and implement

power management requirements (ramp rate limits, output limits, curtailment) as established by PREPA.

## 11. SPECIAL PROTECTION SCHEMES:

PV facility shall provide adequate technology and implement special protection schemes as established by PREPA in coordination with power management requirements.

## 12. GENERAL INTERCONNECTION SUBSTATION

### CONFIGURATION:

An interconnecting generation producer must interconnect at an existing PREPA switchyard, unless otherwise approved by PREPA in the contract. The configuration requirements of the interconnection depend on where the physical interconnection is to occur and the performance of the system with the proposed interconnection. The interconnection must conform, at a minimum, to the original designed configuration of the switchyard. PREPA, at its sole discretion, may consider different configurations due to physical limitations at the site.

## 13. MODELING AND VALIDATION

Once final adjustments and parameter settings related with commissioning and MTR compliance tests are completed, the Seller shall submit a PSS/e Siemens – PTI Certified mathematical model and validation report.

When referred to the mathematical model, this shall include but is not limited to PV inverters, transformers, collector systems, plant controllers, control systems and any other equipment necessary to properly model the PV facility for both steady-state and dynamic simulation modules.

The Seller shall be required to submit user manuals for both the PV inverter and the PV facility models including a complete and detailed description of the voltage regulation system (VRS) and frequency regulation system model implementation. The mathematical models shall be fully compatible with the latest and future versions of PSS/E. It is preferred that the models are PSS/E standard models. In the case that the Seller submits user written models, the Seller shall be required to

keep these models current with the future versions of the PSS/E program until such time that PSS/E has implemented a standard model. The Seller shall submit to PREPA an official report from Siemens - PTI that validates and certifies the required mathematical models, including subsequent revisions. The Seller shall be responsible of submitting the official reports and certifications from Siemens – PTI, otherwise the mathematical model shall not be considered valid.

The Seller shall be responsible to submit Siemens – PTI certified PSSE mathematical models of any kind of compensation devices (ie. SVC, STATCOMs, BESS, etc.) used on the PV facility. It is preferred that the models are standard models provided with PSS/E. In the case that the Seller submits user written models, the PV facility Seller shall be required to keep these models current with the future versions of the PSS/E program until such time that PSS/E has implemented a standard model. In its final form, the mathematical model shall be able to simulate each of the required control and operational modes available for the compensation device and shall be compatible with the latest and future versions of PSSE. The model shall reflect final adjustments and parameters settings related with the control system commissioning process and shall be incorporated to the PSSE mathematical model and tested accordingly by the PV facility Seller and PREPA system study groups. The Seller shall be responsible of submitting the official reports and certifications from Siemens – PTI, otherwise the mathematical models shall not be considered valid.

PV facility Owners that provide user written model(s) shall provide compiled code of the model and are responsible to maintain the user written model compatible with current and new releases of PSS/E until such time a standard model is provided. PREPA must be permitted by the PV facility Owner to make available PV Facility models if required to external consultants with an NDA in place.

The Seller shall submit a PSS/e model validation report. This report shall demonstrate PSS/e simulation results that show the model MTR compliance and performance, based on final adjustment and parameter settings of MTR and commissioning field tests. The Seller shall be responsible of submitting the official reports and certifications from Siemens – PTI, otherwise the mathematical models shall not be considered valid.

Additional details for the adequate PSS/e modeling and the contents of the PSS/e validation report can be found in PREPA's "Guidelines on PSS/e Mathematical Models" document.

#### **14. TRANSIENT MATHEMATICAL MODEL**

The Seller shall be responsible of providing a detailed transient model of the PV facility and to show that it is capable of complying with PREPA's transient Minimum Technical Requirements.

#### **15. DYNAMIC SYSTEM MONITORING EQUIPMENT**

The Seller of the PV facility shall be required to provide, install and commission a dynamic system monitoring equipment that conforms to PREPA's specifications.