

**COMMONWEALTH OF PUERTO RICO
PUBLIC SERVICE REGULATORY BOARD
PUERTO RICO ENERGY BUREAU**

IN RE:
INFORMES DE PROGRESO DE
INTERCONEXIÓN DE LA AUTORIDAD
DE ENERGÍA ELÉCTRICA DE PUERTO
RICO

Case no. NEPR-MI-2019-0016

Subject: Submittal of Interconnection
Progress Reports and Technical
Conference

In response to the PREPA partial filing May 12th 2021, of the Quarterly Compliance Report for the February through April 2021 timeframe, the Solar and Energy Storage Association of Puerto Rico (SESA) respectfully submits these comments and requests for consideration of the Energy Bureau in an effort to encourage full compliance with all Net Metering and Interconnection requirements of Law 17, as well as a smooth transition regarding these matters from PREPA to LUMA leadership.

I. CORRECTING ERRONEOUS DATA (Exhibit B, tab “Mensuales”)

The following data appears to be erroneous (highlighted in the chart below): D137:D139, G137:G139, I137:I139, K137:K139, M137:M139

Datos Facturados					
Mes/Año	Cuentas Facturadas	Energía Exportada	Consumo Sistema AEE	Consumo Facturado al Cliente	Cantidad \$ Facturada
8/1/20	16,884	9,189,112	24,295,467	16,423,328	3,154,677
9/1/20	17,334	12,749,749	25,491,201	17,197,050	3,293,357
10/1/20	18,186	8,815,341	29,690,485	21,686,306	3,956,561
11/1/20	18,659	9,458,581	23,173,490	15,495,915	3,008,639
12/1/20	19,816	8,537,141	23,015,984	15,433,971	3,001,597
1/1/21	20,622	9,115,420	23,017,898	15,183,420	3,084,045
2/1/21	21,407	12,636,671	22,148,611	13,499,788	9,052,462
3/1/21	22,285	17,290,325	21,935,432	12,477,020	12,942,308
4/1/21	23,206	16,365,587	23,114,363	12,449,920	16,821,844

Cantidad \$ Facturada	Capacidad clientes facturados	Registrados ¹		Comporta	
		Capacidad Clientes Registrados	Clientes Registrados	Capacidad Promedio por Cliente Facturado (kW/Cliente)	Capacidad Promedio por Cliente Registrado (kW/Cliente)
3,154,677	168,491	184,781	18,803	10	10
3,293,357	171,443	188,448	19,384	10	10
3,956,561	176,128	194,118	20,298	10	10
3,008,639	180,497	198,265	21,136	9	10
3,001,597	183,144	203,014	21,831	9	9
3,084,045	186,463	207,193	22,588	9	9
9,052,462	191,965	2,781,690	23,712	117	117
12,942,308	196,648	2,628,264	24,712	106	106
16,821,844	199,783	2,813,440	25,476	110	110

SESA Request: We respectfully request that PREB order PREPA to correct these apparent errors, double check any other errors resulting from these apparent errors, double check all other data, and resubmit updated worksheets.

II. ADDING BREAKDOWN BY CUSTOMER CLASS AND/OR SYSTEM SIZE

While the data included in these reports is very illustrative of the growth of Distributed Generation overall and contains a wealth of useful information, it would add significant additional value if this data was also broken down between customer classes and / or by system size .

SESA Request: We respectfully request that PREPA order PREPA to include a breakdown of the amount of MW installed and MWh generated, on a monthly basis if possible, as broken down by residential, commercial, and industrial customers; and/or to require a breakdown of under 25kW, 25kW to 1MW, and 1MW to 5MW size solar installations.

III. IMPROPER CLAIMING OF “COMPLIANCE” (Exhibit A, tab “ x ”)

As stated in SESA’s previous filing in this docket dated May 5th 2021, it is not legal for a utility company to claim “Compliance” with a Renewable Portfolio Standard without having actually “Cancelled” or “Retired” the Renewable Energy Credits (RECs) associated with renewable energy generated.

PREPA's filing of May 12th, Exhibit A tab "x" shows the following chart:

Cartera de Energía Renovable - Año Natural 2020

Energía Renovable Adquirida (GWh) :	
PPOA's	411,120.79
DG	110,427.79
Total	521,548.58
Energía distribuida a los clientes (GWh)	
Energía Distribuida	16,035,294.28
Hidro	50,203.49
Total	15,985,090.79
% de Cumplimiento	3.26%
CER's Adquiridos	411,120.79

Note the PREPA filing uses the term- ***"% de Cumplimiento"*** .

PREPA claims it achieved 3.26% of the required RPS percentage of the RPS mandate; what they are referring to as ***"Cumplimiento"*** .

"% de Cumplimiento" or compliance with the RPS has to be evidenced by "Retired" or "Cancelled" RECs. PREPA indicates in this filing that they "Acquired" 411,120.79 RECs, but they do not indicate whether or how they "Retired" or "Cancelled" these RECs.

To-date, to our knowledge, PREPA has not yet complied with its legal obligations to buy RECs from DG sources. Without having acquired and also cancelled/retired the RECs associated with Distributed Generation, it is not legal for PREPA to publicly state that such energy constitutes a "% of Compliance" with a Renewable Energy Standard law.

SESA Request: We respectfully request that PREB order PREPA to cease using the term *"% de Cumplimiento"*** in this potentially misleading way.**

IV. MANAGEMENT TRANSITION CONTINUITY CONCERNS

Given the consistent historical pattern of noncompliance with net metering and interconnection requirements, we suggest requiring that a clear gameplan be presented on PREPA's part of how to bring the situation into compliance, and on LUMA's part of the

processed planned for achieving 100% compliance - ie for all overdue / backlog of customers to have Net Metering applied to their bills, and looking forward, for all customers to have Net Metering within 30 days of Notification of System Interconnection, as required by law.

If PREPA was in full compliance, it would be important for the Energy Bureau to ensure that lessons learned by PREPA were transferred to LUMA leadership. Since PREPA has to date not demonstrated being anywhere near compliance, it could be of utmost importance to ensure a full knowledge transfer take place between PREPA and LUMA, and that the Energy Bureau provide public transparency and adequate opportunity for stakeholder input to help ensure this process goes as well as possible.

SESA Request: We respectfully request that PREB hold a public hearing soon, before June 1st, wherein both PREPA and LUMA personnel acknowledge and clarify the current status of Net Metering and Interconnection, and present an adequate specific plan for knowledge transfer from PREPA to LUMA, and for ensuring that whatever backlog of customers waiting longer than 30 days is worked through (those customers waiting for Net Metering to be applied to their bills) expeditiously, and also that a clear gameplan exists for ensuring full compliance with these important legal requirements as soon as possible.

CONCLUSION

We express our sincere gratitude for attention to these important matters during this sensitive time.

Sincerely,

PJ Wilson
Presidente, SESA-PR
info@sesapr.org