

**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

June 8th, 2021

The Solar and Energy Storage Association of Puerto Rico (SESA-PR) is a nonprofit trade association with the mission of advancing solar and storage in Puerto Rico at all scales (residential, commercial, industrial, microgrid, virtual power plant, and utility-scale).

In response to the PREPA partial filing May 12th 2021, of the Quarterly Compliance Report for the February through April 2021 timeframe, and the subsequent PREPA filing of May 26th in this docket, SESA-PR 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.

We welcome the ongoing utility transformation, and see this as a time to ensure the best formatting and completeness of these Quarterly Compliance Reports are in place now, to set the stage for complete compliance occurring as soon as possible.

Comments of SESA-PR

Please see our filing in this docket of May 20th, 2021. Our concerns and requests from this filing are ongoing, including request for Energy Bureau oversight to ensure:

- I. Correcting apparently Erroneous Data
- II. Adding requirement for data breakdown by Customer Class and/or System Size
- III. Correcting erroneous use of the word "Compliance"

IV. Ensuring smooth management and knowledge transfer during the LUMA transition

Additionally, we would like to request additional attention to the matters listed below.

- A. Many of our member companies are reporting customers who have been awaiting Net Metering for over one year.

The information required in these Net Metering Quarterly Compliance Reports is very useful. However, regarding timeframe of customers, it's not transparent the number of customers who have been waiting over 180 days for Net Metering.

One concern is that throughout the multiple changes over the last two years (Law 17's passage in April 2019, PREPA Comunicado 19-02, PREPA Comunicado 20-01, multiple upgrades to the Net Metering Portal, and now the LUMA transition), that some customers' files could have been lost or overlooked along the way.

SESA Request: Please require an update to the current Compliance filing which lists all pending customers awaiting Net Metering, and includes the number of days elapsed between the original date of customer application or notification of Net Metering, and the apparent reason

Additionally, please require that the number of customers waiting be aggregated in timeframes, ie:

- Waiting less than 30 days
- Waiting between 30 days and 60 days
- Waiting between 60 days and 90 days
- Waiting between 90 days and 120 days
- Waiting between 120 days and 150 days
- Waiting between 150 days and 180 days
- Waiting over 180 days
- Waiting over 1 year

- B. It is not clear who within the utility is currently responsible for processing Net Metering and Interconnection as of today, nor how impacted customers or companies should get in touch with utility personnel.

SESA Request: Please require public posting, and regular updating of, the names, titles, email addresses and work phone numbers of all PREPA and/or LUMA employees, as well as any contracted entities, involved in the Net Metering & Interconnection process, and a description of what their role is in the process.

- C. There have been reports of many days when the Net Metering Portal has been entirely nonfunctional.

SESA Request: Please require future Net Metering Compliance Reports to include the number of days, and specific days, when the Net Metering Portal is partially or entirely nonfunctional.

- D. Average time to “authorize interconnection” is erroneous.

PREPA’s May 26th filing in this docket says the following, in section II. 4. C (ii):

“El tiempo promedio para autorizar la interconexión de los sistemas de GD completados del período fue de 32 días. Anejo I.”

This states that the average was 32 days customer solar systems that, in the previous compliance reporting period, which both a) notified the utility during the compliance period of the existence of their systems, and also b) had Net Metering applied to their bills during the same compliance period.

This gives the false impression that the utility is somehow “close to being in compliance with” Law 17’s requirement that all customers have Net Metering on their bill within 30 days of notification of the utility.

The report also appears to state in Section II. 4. C (i) that of the 3,642 notifications received in the compliance period, only 452 actually had Net Metering applied to their bill, meaning around 88% of customers who notified the utility of their solar systems did not receive Net Metering on their bill at all during the timeframe included in this report.

The report also states in Section II. 4. C (i) that:

“Además de éstos, se completaron 2,005 casos de generación distribuida (GD) que se encontraban pendientes.”

The report does not appear to indicate the specific or aggregated average amount of time that it took for those systems that were part of the “backlog” at the beginning of the reporting period to be processed.

SESA Request: Please require that this Compliance Report be updated to reflect the following categories:

- i. Cases submitted and processed within the compliance timeframe reported upon.**
- ii. Cases submitted during previous compliance periods and processed during the**

compliance timeframe reported upon.

iii. Cases submitted during the current compliance timeframe and not finished processing.

iv. Cases submitted during previous compliance timeframes and not finished processing.

v. The blended total of the above categories.

Note: Since Law 17 requires that all customers received Net Metering within 30 days of notification of utility, "Compliance" could only be deemed to have occurred if the numbers in all of the categories above is 30 or less.

E. Data in Anejos was submitted in a format not able to be analyzed.

SESA Request: Please require that the data presented in PREPA's filing from May 26th in Ajenos 1, 2, 3 and 4 be also publicly posted in native spreadsheet file format.

F. "Compliance" is erroneously claimed in two sections.

In addition to the error specified in SESA's filing from May 20th, of the erroneous use of the term "% cumplimiento" in Exhibit A, tab x, the term is used in another location erroneously as well.

Note PREPA's filing from May 12th, in both:

- Exhibit B, tab "mensuales", columns X, Y, Z, and AA
- Exhibit B, tab "anuales", columns X, Y, Z, and AA

In both areas of the report, the heading is:

"Cumplimiento en Cartera según Leyes Vigentes"

There are two fundamental problems with this reporting:

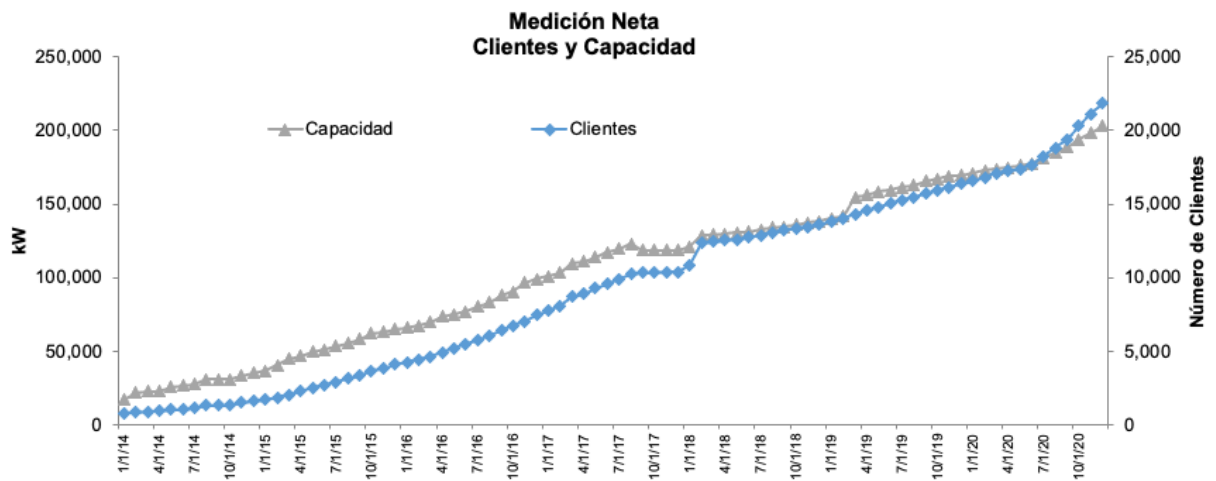
- i. There is no current "Ley Vigente" which requires compliance in year 2021 whatsoever. The first compliance year of the current Renewable Energy Standard is the year 2022.
- ii. It is not legal to claim "compliance" with a Renewable Energy Standard without the utility having acquired, and then cancelled (or "retired") the Renewable Energy Credits (RECs) associated with renewable energy generated.

SESA Request: Please order the correction of this report so that it does not erroneously state "% Compliance" in any section, including:

- Exhibit B, tab “mensuales”, columns X, Y, Z, and AA
- Exhibit B, tab “anuales”, columns X, Y, Z, and AA
- Exhibit A, tax “x”

G. Some graphs are not updated.

For example, in Exhibit B, tab “gráficos”, none of the data from the current Compliance Reporting Period appears to have been included in the graphs, with all data shown being extended only to December 2020 or January 2021 (whereas the current Reporting Period goes through April 2021). Here is one example:



SESA Request: Please order all graphs in Exhibit B, tab “gráficos” to be updated with associated data through the end of the Compliance Reporting Period.

H. There is a concern regarding shortage of Meters needed for Net Metering customers.

Historically, there have been times in PREPA’s past when a lack of modern customer meters was given as a reason for months-long delays for granting customers Net Metering. In 2019, PREPA placed an order for 10,000 meters to be dedicated specifically for Net Metered customers.

This report seems to indicate that those meters are almost all used already, and that there may be insufficient supply of meters not dedicated for Net Metering to meet already-installed systems on the island, yet alone to be sufficient to meet projected demand for the coming months and years.

PREPA's May 26th report states, in Section 5. C (vi):

“Al presente la Autoridad tiene separados exclusivamente para casos de medición neta 1,200 medidores bidireccionales en reserva. En adición, existen 2,400 medidores de uso diario para medición neta en el almacén en Juncos. Al momento, cada oficina Comercial y/o distrito tiene un inventario para suplir las necesidades de los servicios y los cambios que sean aprobados para la medición neta.”

SESA Request: Please order PREPA / LUMA to order an additional 20,000 meters to be dedicated to new Net Metering customers, to ensure a shortage of meters does not become a bottleneck that prohibits customers from being able to attain Net Metering within 30 days as required by Law 17.

CONCLUSION

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

Sincerely,

/ SIGNED /

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