

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

NEPR

Received:

Jun 3, 2021

4:19 PM

IN RE:

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

CASE NO. NEPR-MI-2019-0016

SUBJECT:

Motion Submitting LUMA's Presentation for the
June 8th Compliance Hearing.

**MOTION SUBMITTING PRESENTATION FOR COMPLIANCE HEARING SET FOR
JUNE 8, 2021**

TO THE PUERTO RICO ENERGY BUREAU:

COME NOW, LUMA ENERGY, LLC as Management Co., and **LUMA ENERGY SERVCO, LLC** (collectively, LUMA), through the respective undersigned legal counsel and respectfully state and submit the following:

1. The captioned proceeding involves oversight by this honorable Puerto Rico Energy Bureau ("Energy Bureau") of procedures to handle requests for interconnections of distributed generation systems and microgrids to the Transmission and Distribution System ("T&D System"), pursuant to Acts 57-2014 and 17-2019.

2. Since July 2020, this honorable Energy Bureau has required that the Puerto Rico Electric Power Authority ("PREPA") submit quarterly progress reports on interconnections. *See* Resolution and Order of July 21, 2020. The docket of this proceeding also reveals that the Energy Bureau has held several compliance hearings.

3. Pursuant to a Resolution and Order issued by this Energy Bureau on January 15, 2021, a compliance hearing was set for May 17, 2021. On May 7, 2021, the Energy Bureau postponed the May 17th compliance hearing to June 8, 2021 ("May 7th Resolution and Order").

4. In the May 7th Resolution and Order, this honorable Energy Bureau took notice of the transition process underway between LUMA and PREPA. On June 1st, 2021, LUMA assumed its role as Operator of the T&D System per the terms of the Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement dated as of June 22, 2020 as supplemented by the Puerto Rico Transmission and Distribution System Supplemental Terms Agreement.

5. In the May 7th Resolution and Order the Energy Bureau ordered that LUMA shall appear at the June 8th compliance hearing and directed that, prospectively, LUMA shall file the quarterly progress reports that the Energy Bureau has required in this proceeding. *See* May 7th Resolution and Order at page 1.

6. The May 7th Resolution and Order also stated that in the compliance hearing set for June 8th, PREPA shall inform on the progress achieved during each relevant period. *Id.* The Energy Bureau directed, in turn, that LUMA “should be prepared to explain, in detail, the process of orderly transition between PREPA and LUMA to continue efforts for the interconnection of distributed generation systems.” *Id.*

7. In compliance with the May 7th Order, LUMA hereby submits the presentation to be offered during the June 8th compliance hearing. *See* Exhibit 1. The presentation outlines LUMA’s framework and efforts for the transition of operations with regards to interconnections of distributed generation systems, as well as LUMA’s initiatives to improve existing processes.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned and **accept** the presentation to be offered by LUMA at the June 8th compliance hearing, which is submitted as Exhibit 1 to this Motion.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this June 3rd, 2021.

I hereby certify that I filed this motion using the electronic filing system of this Energy Bureau and that I will send an electronic copy of this motion to the attorneys for PREPA, Joannely Marrero-Cruz, jmarrero@diazvaz.law; and Katiuska Bolaños-Lugo, kbolanos@diazvaz.law. Notice will also be sent to the Office of the Independent Consumer Protection Office, Lcda. Hannia Rivera Diaz, hrivera@jrsp.pr.gov and to counsel for the Puerto Rico Solar Energy Industries Association Corp. (“SESA”), javrua@sesapr.org.



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Compliance Hearing on transition of operations for interconnection of distributed generation

NEPR-MI-2019-0016
June 8, 2021

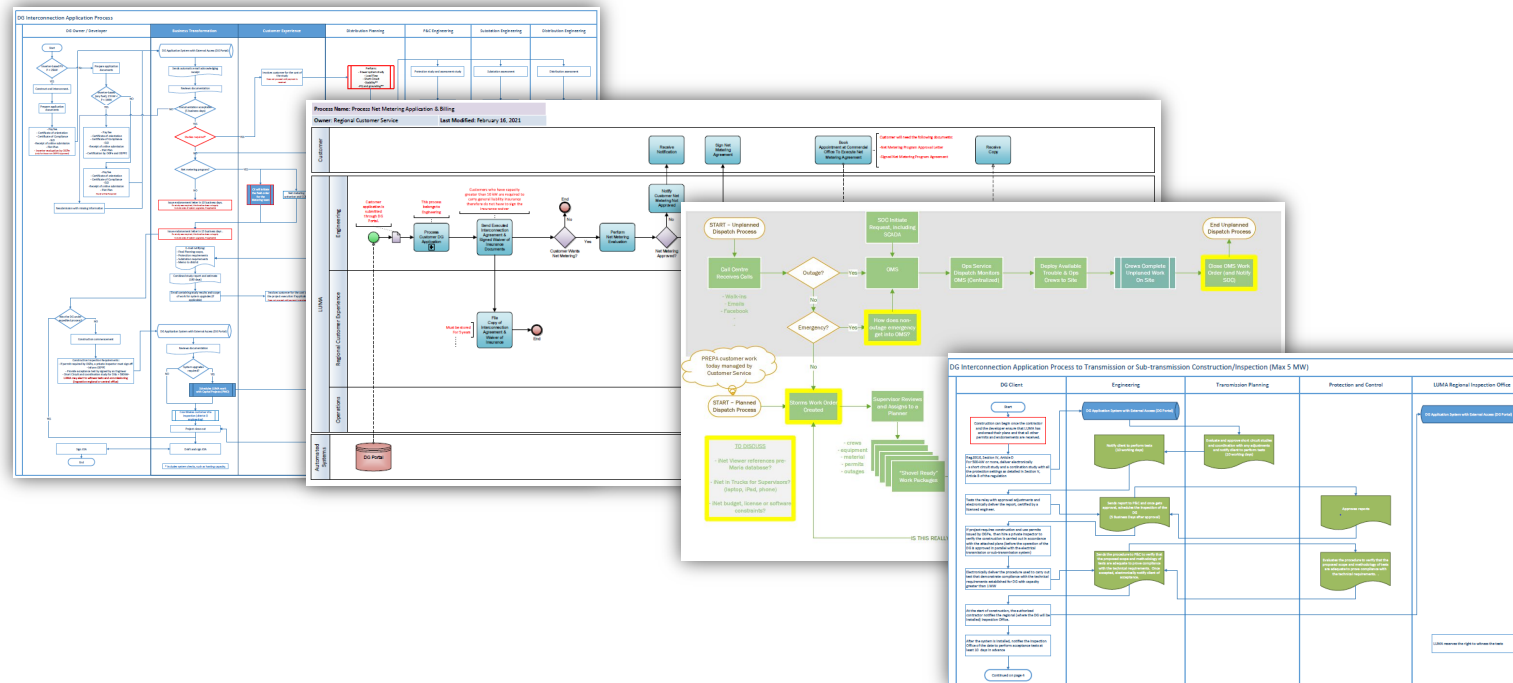
Processes and plans for interconnection of distributed generation

Agenda

- Transition of Operations from PREPA to LUMA
- Opportunities for Improvement

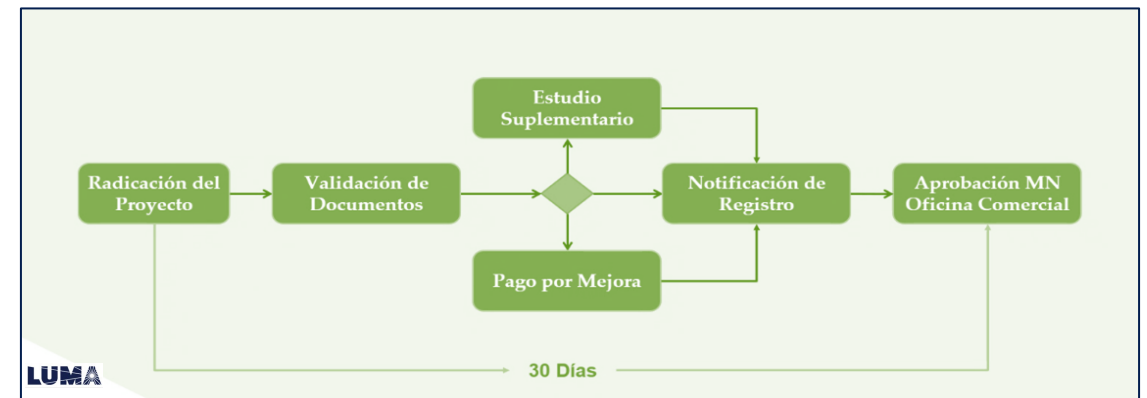
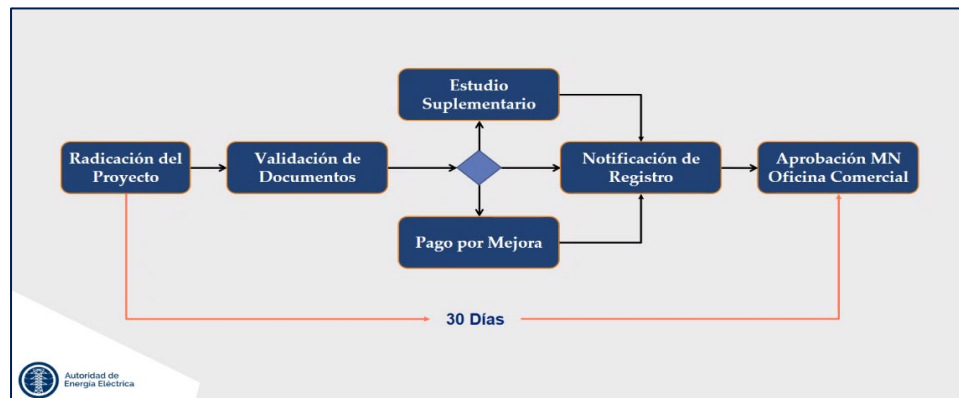
Pre-Commencement Activities

LUMA has conducted extensive interviews with PREPA staff, engaged local industry stakeholders, reviewed NREL reports on PREPA's process, considered industry best practices, and reviewed statistics on current applications to identify near-term process improvements. LUMA has studied the existing processes in detail and will update/revise procedure manuals as needed. LUMA has also hired key PREPA staff and external contractors.



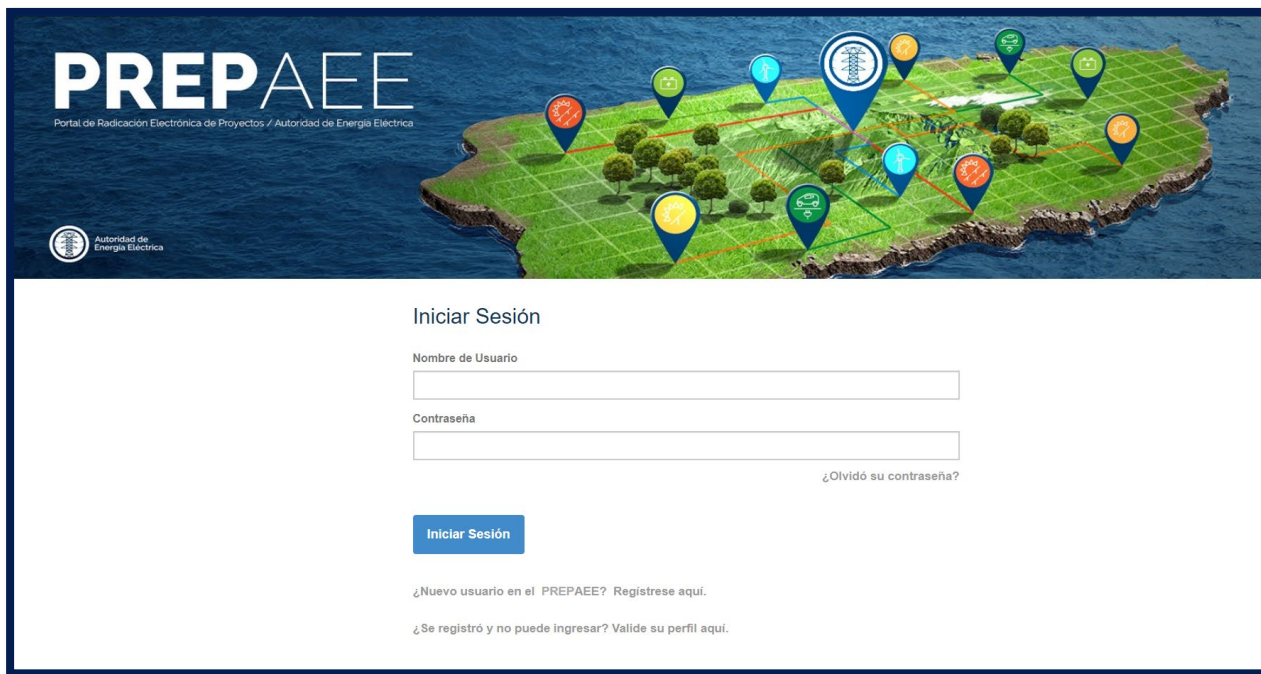
LUMA's Approach – Day 1

- LUMA will maintain continuity of existing processes on Day 1 to prevent disruption and confusion.
- LUMA has also identified opportunities to streamline and improve the process in the near term.
- LUMA will focus on steadily improving management of the process by introducing new administrative systems and tools.



Application Portal Continuity

- In order to facilitate a smooth transition, “front end” of the portal will not change.
- Customers applying through the DG Portal will not notice any difference in registering an application.



The screenshot shows the login page for PREPAEE (Portal de Radicación Electrónica de Proyectos / Autoridad de Energía Eléctrica). The header features the PREPAEE logo and a banner image of a map of Puerto Rico with various icons representing different services. Below the banner, the login form is titled 'Iniciar Sesión'. It includes input fields for 'Nombre de Usuario' and 'Contraseña', a '¿Olvidó su contraseña?' link, and a blue 'Iniciar Sesión' button. At the bottom, there are links for new users to register and for existing users to validate their profile.

PREPAEE
Portal de Radicación Electrónica de Proyectos / Autoridad de Energía Eléctrica

Autoridad de Energía Eléctrica

Iniciar Sesión

Nombre de Usuario

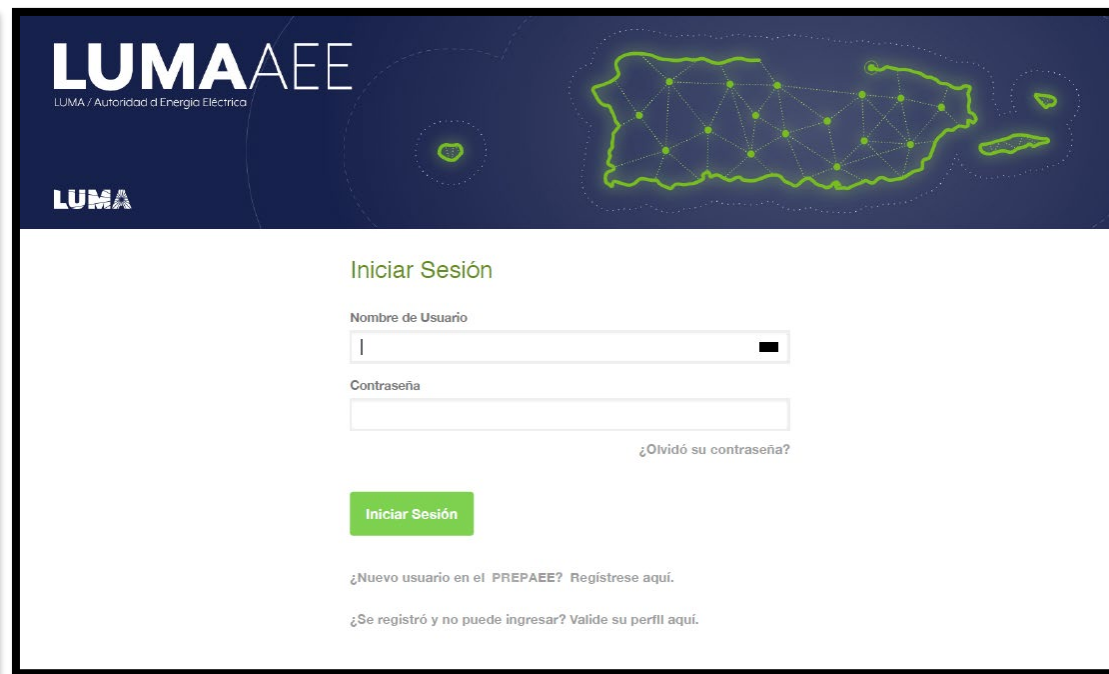
Contraseña

[¿Olvidó su contraseña?](#)

Iniciar Sesión

[¿Nuevo usuario en el PREPAEE? Regístrese aquí.](#)

[¿Se registró y no puede ingresar? Valide su perfil aquí.](#)



The screenshot shows the login page for LUMA AEE (LUMA / Autoridad de Energía Eléctrica). The header features the LUMA AEE logo and a banner image of a map of Puerto Rico with a network diagram overlay. Below the banner, the login form is titled 'Iniciar Sesión'. It includes input fields for 'Nombre de Usuario' and 'Contraseña', a '¿Olvidó su contraseña?' link, and a green 'Iniciar Sesión' button. At the bottom, there are links for new users to register and for existing users to validate their profile.

LUMA AEE
LUMA / Autoridad de Energía Eléctrica

LUMA

Iniciar Sesión

Nombre de Usuario

Contraseña

[¿Olvidó su contraseña?](#)

Iniciar Sesión

[¿Nuevo usuario en el PREPAEE? Regístrese aquí.](#)

[¿Se registró y no puede ingresar? Valide su perfil aquí.](#)

DG Interconnection – Organization Transition for DAY 1

LUMA will maintain continuity of existing processes and organizational responsibilities on Day 1 to prevent disruption and confusion.

Key Interconnection Activities	Pre-Commencement Organizational Responsibility	Post-Commencement Organizational Responsibility
Application Intake Customer submission	<ul style="list-style-type: none"> • PREPA Application Portal 	<ul style="list-style-type: none"> • LUMA Application Portal
Application Validation Completeness review	<ul style="list-style-type: none"> • PREPA Regional Distribution Engineering • Supplemented by contractor 	<ul style="list-style-type: none"> • LUMA Regional Distribution Engineering • LUMA Business Transformation Dept. • Supplemented by contractor
Technical Validation Review project and system specifications	<ul style="list-style-type: none"> • PREPA Regional Distribution Engineering 	<ul style="list-style-type: none"> • LUMA Regional Distribution Engineering • LUMA Business Transformation Dept.
Supplementary Studies For feeders above 15% capacity	<ul style="list-style-type: none"> • PREPA T&D Planning 	<ul style="list-style-type: none"> • LUMA T&D Planning
Customer Experience Metering, payment, billing	<ul style="list-style-type: none"> • PREPA Regional Customer Service 	<ul style="list-style-type: none"> • LUMA Customer Experience • LUMA Operations Dept.
Reporting Collect and manage statistics for regulatory reporting	<ul style="list-style-type: none"> • PREPA T&D Planning • PREPA Regional Customer Service 	<ul style="list-style-type: none"> • LUMA Regulatory • LUMA Customer Experience • LUMA Business Transformation Dept.

COLOR KEY

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Transition – Next Steps

- LUMA has reviewed current processes and hired key PREPA staff and contractors to ensure continuity on Day 1.
- Our team will be working to streamline administrative processes in the near term to operate more efficiently and systematically, with a focus on continuous improvement.
- The following slides offer opportunities for improvement that LUMA will begin developing and implementing upon commencement.

Summary of Improvement Opportunities

Findings	Actions
Applications are handled in a regional setting where there are competing priorities and differing levels of resources, which makes it difficult to ensure applications are consistently processed on time.	Centralize and standardize application management, coordinated through a dedicated team.
NEM customers require meter change and tariff change. This is currently done at the end of the process, after complete review.	With some modifications to the process and system, meter/tariff change request can be initiated earlier and processed in parallel, to streamline this process.
The 10+ attachments required for application submission are not fillable documents with error checking or electronic signature capability.	Consolidate the documents as much as possible and make them fillable with error checking, with user helps and e-signatures that can be automatically checked to reduce processing time.
Over 100 circuits have hit 15% penetration and require supplemental study.	Utilize hosting capacity calculation pro-actively for the respective circuits.
Multiple people are involved in processing each application introducing delays in processing.	Processing of all applications less than or equal to 25kW, that do not require further technical review, will be conducted by a single processor/person, reducing sequential and redundant processing.
5-8 circuits have reverse power at the substation. No substation transformer experienced reverse power yet.	Monitor past circuit SCADA values and determine if a circuit may experience reverse flow and add protection scheme if necessary.
Smart inverter features have not been utilized.	Investigate how to use absorbing PF, volt/var control, volt/watt control and other control strategies to allow more or larger systems further out on the feeder at different penetration level scenarios.

DG Interconnection – 30/60/90 Organization Transition

Key Activities	Pre-Commencement	First 30 Days	> 60/90 Days
Application Intake Customer submission	<ul style="list-style-type: none"> PREPA Application Portal 	<ul style="list-style-type: none"> LUMA rebranded the DG Application Portal, but there will be no impact to new or in-progress customer applications 	<ul style="list-style-type: none"> LUMA will engage the third-party IT firm that supports the DG portal to begin implementing system improvements as needed
Application Validation Completeness review	<ul style="list-style-type: none"> PREPA Regional Distribution Engineering Supplemented by contractor 	<ul style="list-style-type: none"> LUMA regional distribution engineering and contractors will continue validating applications, supplemented with additional staff from Business Transformation 	<ul style="list-style-type: none"> LUMA Business Transformation team will centrally manage the DG application validation process and will be supplemented by contractor LUMA Business Transformation will implement enhancements found during detailed process review
Technical Validation Review project and system specifications	<ul style="list-style-type: none"> PREPA Regional Distribution Engineering 	<ul style="list-style-type: none"> LUMA will continue technical validation with a regional distribution engineering model and will be supplemented by contractor 	<ul style="list-style-type: none"> LUMA Business Transformation team will centrally manage the DG technical validation process with support from distribution engineering Hosting capacity analysis tools will help streamline the technical validation process
Supplementary Studies For feeders above 15% capacity	<ul style="list-style-type: none"> PREPA T&D Planning 	<ul style="list-style-type: none"> LUMA T&D Planning will continue to perform supplementary studies 	<ul style="list-style-type: none"> LUMA hosting capacity analysis tools and process improvements will help streamline the supplementary study process
Customer Experience Metering, payment, billing	<ul style="list-style-type: none"> PREPA Regional Customer Service 	<ul style="list-style-type: none"> LUMA Customer Experience will continue to coordinate meter change and billing system update processes 	<ul style="list-style-type: none"> LUMA will streamline meter/tariff change requests to reduce project completion time.
Reporting Collect and manage statistics for regulatory reporting	<ul style="list-style-type: none"> PREPA T&D Planning PREPA Regional Customer Service 	<ul style="list-style-type: none"> LUMA Business Transformation team will manage data and statistics, working with the Regulatory team to prepare reports 	<ul style="list-style-type: none"> LUMA will monitor application tracking data to systematically identify and remove bottlenecks and improve forecasting capabilities.

Conclusion

- LUMA has reviewed current processes and regulations, hired key PREPA staff, engaged local industry stakeholders, reviewed NREL reports, and reviewed statistics on current applications to identify near-term process improvements.
- LUMA will maintain continuity of existing processes on Day 1 to prevent disruption and confusion.
- Our team will be working to streamline administrative processes to operate more efficiently and systematically in the near term, with a focus on continuous improvement, by steadily improving administrative systems and tools.





Thank you

