

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

IN RE: PUERTO RICO TEST FOR DEMAND
RESPONSE AND ENERGY EFFICIENCY

CASE NO: NEPR-MI-2021-0009

SUBJECT: Comments on August 23, 2021
Workshop.

RESOLUTION

On May 14, 2021, the Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") issued a Resolution and Order ("May 14 Resolution") through which it initiated this proceeding for the Puerto Rico Benefit Cost Test ("PR Test") as required by Regulation 9246.¹ The Energy Bureau established that the purpose of this proceeding is to develop a Puerto Rico specific cost-effectiveness framework to assess the benefits and costs of future demand response ("DR") and energy efficiency ("EE") programs.

As established through the June 16, 2021 Resolution in the instant case, the Energy Bureau has held several workshops on June 30, 2021, July 21, 2021, and August 23, 2021.

The Energy Bureau is interested in receiving general comments on the issues discussed as part of the August 23, 2021 Technical Workshop. Further, as discussed in the workshop, the Energy Bureau has developed a Draft Impact List for the Puerto Rico Test, which is included as Attachment A to this Resolution. The purpose of such list is for stakeholders to assess the cost-effectiveness of distributed energy resource programs based on the different impacts they can provide.

Therefore, the Energy Bureau **GRANTS** stakeholders and LUMA Energy ServCo, LLC **until September 10, 2021** to provide their comments (i) on the issues discussed in the August 23, 2021 Technical Workshop; and (ii) on Attachment A to this Resolution.

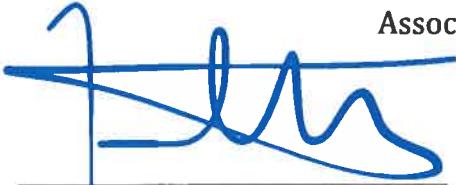
Be it notified and published.

¹ Regulation 9246, *Regulation for Demand Response*, December 21, 2020.



Handwritten blue initials: ZAA, Jm, Jm


Lillian Matedo Santos
Associate Commissioner


Ferdinand A. Ramos Soegaard
Associate Commissioner


Sylvia B. Ugarte Araujo
Associate Commissioner

CERTIFICATION

I hereby certify that the majority of the members of the Puerto Rico Energy Bureau has so agreed on August 27, 2021. President Edison Avilés Deliz did not intervene. Associate Commissioner Ángel R. Rivera de la Cruz did not intervene. I also certify that on August 27, 2021 a copy of this Resolution and Order was notified by electronic mail to the following:

astrid.rodriguez@prepa.com, lionel.santa@prepa.com,
margarita.mercado@us.dlapiper.com, kbolanos@diazvaz.law, jmarrero@diazvaz.law;
Elias.sostre@aes.com; Jesus.bolinaga@aes.com; cfl@mcvpr.com; ivc@mcvpr.com;
notices@sonnedix.com; leslie@sonnedix.com; victorluisgonzalez@yahoo.com;
tax@sunnova.com; jcmendez@reichardescalera.com; r.martinez@fonroche.fr;
gonzalo.rodriguez@gestampren.com; kevin.devlin@patternenergy.com;
fortiz@reichardescalera.com; jeff.lewis@terraform.com; mperez@prrenewables.com;
cotero@landfillpr.com; geoff.biddick@radiangen.com; hjcruz@urielrenewables.com;
carlos.reyes@ecoelectrica.com; megan.semiao@longroadenergy.com;
tracy.deguise@everstreamcapital.com; agraitfe@agraitlawpr.com;
h.bobea@fonrochepr.com; ramonluisnieves@rlnlegal.com; hrivera@jrsp.pr.gov;
info@sesapr.org; yan.oquendo@ddec.pr.gov; acarbo@edf.org; pjcleanenergy@gmail.com;
nicolas@dexgrid.io; javrua@gmail.com; JavRua@sesapr.org; lmartinez@nrdc.org;
thomas.quasius@aptim.com; rtorbert@rmi.org; lionel.orama@upr.edu;
noloseus@gmail.com; aconer.pr@gmail.com; dortiz@elpuente.us;
wilma.lopez@ddec.pr.gov; gary.holtzer@weil.com; ingridmvila@gmail.com;
rstgo2@gmail.com; agc@agcpr.com; presidente@ciapr.org; cpsmith@unidosporutuado.org;
jmenen6666@gmail.com; cpares@maximosolar.com; CESA@cleanegroup.org;
acasepr@gmail.com; secretario@ddec.pr.gov; julia.mignuccisanchez@gmail.com;
professoraviles@gmail.com; gmch24@gmail.com; ausubopr88@gmail.com;
carlos.rodriguez@valairlines.com; amaneser2020@gmail.com; acasellas@amgprlaw.com;
presidente@camarapr.net; jmarvel@marvelarchitects.com; amassol@gmail.com;
jmartin@arcainc.com; eduardo.rivera@afi.pr.gov; leonardo.torres@afi.pr.gov;
carsantini@gmail.com; directoralcaldes@gmail.com; imolina@fedalcaldes.com;
LCSchwartz@lbl.gov; thomas@fundacionborincana.org; cathykunkel@gmail.com;



joseph.paladino@hq.doe.gov; adam.hasz@ee.doe.gov; Sergio.Gonsales@patternenergy.com;
Eric.Britton@hq.doe.gov; energiaverdepr@gmail.com; Arnaldo.serrano@aes.com;
gustavo.giraldo@aes.com; accounting@everstreamcapital.com; mgrpcorp@gmail.com;
jczayas@landfillpr.com; Jeanna.steele@sunrun.com; mildred@liga.coop;
rodrigomasses@gmail.com; presidencia-secretarias@seguros multiples.com;
cpsmith@cooperativahidroelectrica.coop; maribel@cooperativahidroelectrica.coop;
apoyo@cooperativahidroelectrica.coop; larroyo@earthjustice.org;
flcaseupdates@earthjustice.org; hriviera@jrsp.pr.gov, contratistas@jrsp.pr.gov;
rstgo2@gmail.com, pedrosaade5@gmail.com, rolando@bufete-emmanuelli.com;
notificaciones@bufete-emmanuelli.com; jessica@bufete-emmanuelli.com;
rhoncat@netscape.net; Marisol.Bonnet@hq.doe.gov; ernesto.rivera-umpierre@hq.doe.gov;
elizabeth.arnold@hq.doe.gov; info@icsepr.org; john.jordan@nationalpfg.com;
info@marinsacaribbean.com; aconer.pr@gmail.com; pathart@ge.com;
contratistas@jrsp.pr.gov; Laura.rozas@us.dlapipe.com; msulejmanagic@ieefa.org;
renewableenergy@me.com; mario.hurtado@lumamc.com; wayne.stensby@lumamc.com;
Ashley.engbloom@lumamc.com; Legal@lumamc.com; jorge.flores@lumapr.com;
breanna.wise@lumapr.com; energia@ddec.pr.gov; Francisco.Berrios@ddec.pr.gov;
Laura.Diaz@ddec.pr.gov; isabel.medina@ddec.pr.gov; ialicea@sanjuanciadapatria.com;
alescudero@sanjuanciadapatria.com; oabayamon@yahoo.com;
gguevara@prsciencetrust.org; Melvin.Ayala@lumapr.com; elizabeth.arnold@hq.doe.gov;
JCuadrado@trccompanies.com; nfrick@lbl.gov; pacappers@lbl.gov;
angel.d.rodriguez@outlook.com; carrasquillo.rafael@gmail.com;
Heather.Robinson@lumamc.com. I also certify that today, August 27, 2021, I have proceeded
with the filing of the Resolution and Order issued by the Puerto Rico Energy Bureau.

For the record, I sign this in San Juan, Puerto Rico, today August 27, 2021.



Sonia Seda Gaztambide
Clerk



Attachment A

Draft Impact List for Puerto Rico Test

The table below includes the full list of impacts to include in the Puerto Rico Test (PR Test) for assessing the cost-effectiveness of DER programs.

For each impact, please assess the following:

1. Potential magnitude: what impacts may have largest effect on the benefit-cost analysis?
2. Challenge in developing impact: how difficult will it be to quantify and monetize the impact?
3. Priority: how important is the impact to Puerto Rico? Is the impact a low, medium, or high priority to quantify?

This exercise will help determine which impacts should attempt to be quantified first so that a monetized (\$ value) can be included in the PR Test. Impacts that may be a smaller priority, or difficult to quantify can be addressed qualitatively or through an adder or proxy within the test. Overtime as programs mature in Puerto Rico, quantitative values can be studied and developed.

Impacts	Potential Magnitude (Low, Medium, High)	Challenge in Developing (Low, Medium, High)	Priority (Low, Medium, High)
Utility System Impacts			
Energy Generation			
Generation Capacity			
Environmental Compliance			
Renewable Portfolio Standard Savings			
Ancillary Services			
Transmission Capacity			
Transmission System Losses			
Distribution Costs (includes capacity, O&M, voltage)			
Distribution System Losses			
Utility Program Incentives (rebates, interest rate buy-down, etc.)			



Impacts	Potential Magnitude (Low, Medium, High)	Challenge in Developing (Low, Medium, High)	Priority (Low, Medium, High)
Program Administration Costs			
Utility Performance Incentives			
Credit and Collection Costs			
Utility Rate Riders			
Risk			
Reliability			
Resilience			
Host Customer Impacts			
Host customer portion of DER costs			
Host customer transaction costs			
Interconnection fees			
Risk			
Reliability			
Resilience			
Tax Incentives			
<u>Non-Energy Impacts:</u>			
Asset Value			
Productivity			
Economic well-being			
Comfort			
Health & Safety			
Empowerment & Control			
Satisfaction & Pride			
Low-Income Host Customer Impacts			
Reduced energy burden			
Reduced O&M costs			



Impacts	Potential Magnitude (Low, Medium, High)	Challenge in Developing (Low, Medium, High)	Priority (Low, Medium, High)
Increased comfort			
Increased health & safety/reduced medical costs			
Increased productivity			
Improved aesthetics			
Property improvements			
Reduced home foreclosures			
Other Fuels Impacts			
Societal Impacts			
GHG Emissions (i.e., social cost of carbon)			
Other Environmental (land, water, non-embedded air emissions)			
Economic and Jobs			
Energy Security			

