

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

NEPR

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

CASE NO.: NEPR-MI-2021-0009

SUBJECT: THE INDEPENDENT
CONSUMER PROTECTION
OFFICE'S COMMENTS TO
ATTACHMENT A OF THE
ENERGY BUREAU'S AUGUST 27,
2021 RESOLUTION.

INDEPENDENT CONSUMER PROTECTION OFFICE'S
COMMENTS TO ATTACHMENT A OF THE ENERGY BUREAU'S
AUGUST 27, 2021 RESOLUTION

COMES NOW, THE INDEPENDENT CONSUMER PROTECTION OFFICE
(hereinafter, "ICPO"), through the undersigned attorneys, and very respectfully STATES
and PRAYS:

I. INTRODUCTION

1. On May 14, 2021, the Energy Bureau of the Puerto Rico Public Service
Regulatory Board (hereinafter, "Energy Bureau") issued a Resolution and Order through
which initiated this proceeding for the Puerto Rico Cost Test for Demand Response and
Energy Efficiency as required on Regulation 9246, *Regulation for Demand Response*, of
December 21st, 2020.

2. As part of the instant process, three technical workshops have been held. The first one on June 30, 2021, the second one on July 31, 2021, and the third one on August 25, 2021.

3. On August 27, 2021, the Energy Bureau issued a Resolution (hereinafter, "August 27 Resolution") granting stakeholders and LUMA Energy ServCo, LLC until September 10, 2021 to provide their comments (i) on the issues discussed in the August 25, 2021 Technical Workshop; and (ii) on Attachment A of the Resolution.

II. STANDING OF THE INDEPENDENT CONSUMER PROTECTION OFFICE ("ICPO")

4. The Independent Consumer Protection Office was created by Act 57-2014, *supra*, to educate, advise, assist, and represent customers of the services under the jurisdiction of the Puerto Rico Public Service Regulatory Board, such as power service customers in the Commonwealth of Puerto Rico.

5. Within the powers and duties enumerated in Section 6.42 of Act 57-2014, *supra*, the ICPO shall have the followings:

- (a) *Educate, inform, and provide orientation and assistance to customers on their rights and responsibilities with regard to the electric power service and the public policy on savings, conservation, and efficiency, telecommunication services, and those under the jurisdiction of the Transport and other Public Services Bureau;*
- (b) *Evaluate the impact that the rates, public policy, and any other issue may have on electric power, telecommunications, and transport services customers in Puerto Rico;*
- (c) *Defend and advocate for the interests of customers in all matters brought before the Energy Bureau, the Telecommunications Bureau, the Transport and other Public Services Bureau or being addressed by the Energy Public Policy Program of the Department of Economic Development with regard to electric power rates and charges, the quality*

of the electric power service, services provided by electric power service companies to their customers, resource planning, public policy, and any other matter of interest for customers;

(...)

- (e) Participate in the rate adoption or modification process for issues affecting electric power, telecommunications, and transport services' customers;*
 - (f) Make independent recommendations to the Bureaus regarding rates, bills, public policy, and any other issue that may affect services' customers in Puerto Rico;*
 - (g) Request and advocate for just and reasonable rates for the consumers represented by the Office;*
 - (h) Participate or appear as intervenor in any action brought before a government agency of the Government of Puerto Rico or the Federal Government with jurisdiction, in connection with rates, bills, public policy, and any other issue that may affect electric power, telecommunications, and transport services' consumers and/or customers;*
- (...)*

6. Consequently, the ICPO has the legal power and duty to submit comments for the benefit of electric power customers.

III. ICPO'S COMMENTS

7. Jointly with this motion, the ICPO hereby submits Attachment A of the August 27 Resolution, duly filled with our comments.

WHEREFORE, it is respectfully requested from the Energy Bureau to take notice of the ICPO's comments.

Respectfully submitted.

In San Juan P.R. this 9th day of September 2021.

CERTIFICATE OF ELECTRONIC FILING AND SERVICE

I HEREBY CERTIFY that on this date copy of this motion has been electronically filed with the Clerk of the Puerto Rico Energy Bureau which will give notice to all participants in the instant case.

OIPC

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7-Sep-21

ATTACHMENT A FILLED TABLE
PR TEST WORKSHOP ASSIGNMENT

Impacts	Potential Magnitude (Low, Medium, High)	Challenge in Developing (Low, Medium, High)	Priority (Low, Medium, High)
Utility System Impacts			
Energy Generation	H	L	H
Generation Capacity	H	M	H
Environmental Compliance	H	M	H
Renewable Portfolio Standard Savings	L	H	M
Ancillary Services	H	M	H
Transmission Capacity	L	L	L
Transmission System Losses	H	L	H
Distribution Costs (includes capacity, O&M, voltage)	H	H	H
Distribution System Losses	H	H	H
Utility Program Incentives (rebates, interest rate buy-down, etc.)	H	L	H
Program Administration Costs	H	L	H
Utility Performance Incentives	L	L	M
Credit and Collection Costs	H	L	H
Utility Rate Riders	H	L	H
Risk	M	L	L
Reliability	H	L	H
Resilience	H	M	H
Host Customer Impacts			
Host customer portion of DER costs	H	M	H
Host customer transaction costs	H	L	H
Interconnection fees	H	L	H
Risk	M	M	H
Reliability	H	M	H
Resilience	H	M	H
Tax Incentives	H	L	H
Non-Energy Impacts:			
Asset Value	H	L	H
Productivity	L	H	L
Economic well-being	H	H	M
Comfort	L	H	M
Health & Safety	H	M	H
Empowerment & Control	H	M	H
Satisfaction & Pride	H	M	H
Low-Income Host Customer Impacts			
Reduced energy burden	H	L	H
Reduced O&M costs	H	L	H

Increased comfort	M	M	H
Increased health & safety/reduced medical costs	H	H	M
Increased productivity	L	H	L
Improved aesthetics	L	H	L
Property improvements	M	L	M
Reduced home foreclosures	L	H	L
Other Fuels Impacts	H	L	H
Societal Impacts			
GHG Emissions (i.e., social cost of carbon)	H	L	H
Other Environmental (land, water, non-embedded air emissions)	H	L	H
Economic and Jobs	H	M	H
Energy Security	H	M	H