

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

NEPR Received: Oct 15, 2021 9:13 PM
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IN RE:
INTERCONNECTION REGULATIONS

CASE NO.: NEPR-MI-2019-0009

SUBJECT: Request for Additional Time to Submit Additional Comments to Preliminary Draft of Proposed Generating Facility and Microgrid Interconnection Regulation

MOTION REQUESTING ADDITIONAL TIME TO SUBMIT ADDITIONAL COMMENTS TO PRELIMINARY DRAFT OF PROPOSED GENERATING FACILITY AND MICROGRID INTERCONNECTION REGULATION

TO THE PUERTO RICO ENERGY BUREAU:

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

On July 15, 2021, this Puerto Rico Energy Bureau (“Energy Bureau”) issued a Resolution and Order (the “July 15 Resolution”) notifying that it had developed a draft for a new comprehensive interconnection regulation (titled *Generating Facility and Microgrid Interconnection Regulation*) (“Preliminary Draft”) to govern the interconnection of distributed generators and microgrids. The Energy Bureau also indicated that before initiating a formal rulemaking procedure it was providing interested persons the opportunity to submit comments on the Preliminary Draft and invited LUMA and interested stakeholders to provide their comments and feedback to the Preliminary Draft on or before July 30, 2021. *See* July 15 Resolution at pp. 4-5. This Energy Bureau further indicated that “[t]he Energy Bureau’s intention is to improve the Preliminary Draft before the formal rulemaking process commences”. *See id.* at p. 4.

In the July 15 Resolution, this Energy Bureau also indicated, with respect to certain attachments referenced in the Preliminary draft, that: “As part of the Preliminary Draft, the Energy Bureau included several attachments, some of which may need to be modified. Some of the attachments to the Preliminary Draft were not included and will need to be developed. The Energy Bureau requests stakeholders to comment and suggest modifications to the included attachments as well as to propose content and format for those attachments not included.” *See id.*

On July 30, 2021, LUMA submitted comments to the Preliminary Draft, in the form of a narrative document with general comments, attached as *Exhibit 1*, and a revised Preliminary Draft with LUMA’s comments and incorporating some explicit edits, attached as *Exhibit 2*. Given the limited time frame to submit these initial comments, the comments submitted by LUMA on July 30, 2021, were mostly of a conceptual nature and did not include all the proposed explicit changes to the regulation or the proposed Attachments that may be necessary to address the conceptual comments.

On August 3, 2021, the Energy Bureau provided the Independent Consumer Protection Office and any other interested parties an additional fourteen (14) days to submit their comments to the Preliminary Draft.

On September 10, 2021, the Energy Bureau issued a Resolution publishing the Spanish version of the Preliminary Draft and granted interested parties until September 30, 2021, to submit their comments to it.

After having the benefit of examining and studying in more depth the Preliminary Draft and the comments submitted by various interested parties during this informal process, LUMA respectfully submits that it has additional and more detailed comments to provide to the

Preliminary Draft to address technical and practical issues that could arise in connection with the implementation of the proposed regulation. Among other technical comments, LUMA can provide specific proposed revisions to the text of the regulation and to the proposed Attachments to expand on LUMA's initial conceptual comments. LUMA's more detailed comments with specific proposed text will facilitate the Energy Bureau's revision of the Preliminary Draft and help yield an improved draft of the proposed regulation that the Energy Bureau will issue for the formal rulemaking process.

As operator of the transmission and distribution system, LUMA is the entity primarily charged with implementing the proposed interconnection regulation, LUMA respectfully submits that LUMA's proposed additional comments on the Preliminary Draft will ensure necessary consideration of key technical issues and ultimately lead to regulation that be implemented effectively in order to achieve the objectives of the applicable law.

WHEREFORE, LUMA respectfully requests this honorable Energy Bureau an additional timeframe, to expire on November 15, 2021, to submit additional and more specific comments to the Preliminary Draft of the *Generating Facility and Microgrid Interconnection Regulation*.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 15th day of October 2021.

We certify that We filed this motion using the electronic filing system of the Puerto Rico Energy Bureau.



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RUA Núm. 10,398