1. **In the May 17th update, the information on the graphic on slide 5 doesn't appear to be correct (it also doesn't appear to be correct in the May 13th version). The May 17th version shows that in 2021, they had a total of 50,000 "Clientes facturados por mes en promedio". Their May 17th slide says that:**

   For the entire year of 2021, the "average per month" number of Net Metering clients was 50,000. This number is way too high.

   According to the submitted Anejo 2, tab "Mensuales", averaging their number of stated monthly net metering clients yields:

   For 2021: 25,567 average monthly "Cuentas Facturadas", and 29,775 "Clientes Registrados"

   For 2022 (thru April): 37,605 average monthly "Cuentas Facturadas" and 44,658 "Clientes Registrados"

   NOTE: It's unclear why the number of "Clientes facturados por mes en promedio" is an important or significant number. On an annual basis, what's most important is the number of clients with net metering *at the end of the year*.

2. **In the May 17th update, it appears unclear or undefined what exactly "Gran Escala" and "Mediana Escala" mean.**

   Does "Gran Escala" means utility-scale projects of 20MW or above?

   Does "Mediana Escala" mean between 1MW and 5MW?

3. Please explain all the reasons for the discrepancies between "Clientes Registrados" and "Cuentas Facturadas". There Anejo 2, "mensuales", shows a discrepancy of between 6,000 and 10,000 customers.

   Is "Cuentas Facturadas" the actual number of customers with net metering today (plus the 2,053 in the backlog)?

   Should the numbers for "Cuentas Registrados" be ignored? Or are they meaningful in some way?

4. How come the data on Anejo 2, "mensuales" shows that there were 2,384 LESS "Cuentas Facturadas" in April as compared to May? And a corresponding drop of 21,151 kW LESS "Capacidad clients facturados"?

Mes/Año	Cuentas Facturadas	Capacidad clientes facturados	Capacidad Clientes Registrados	Clientes Registrados
11/1/21	31,626	222,826	296,170	38,678
12/1/21	33,896	237,499	304,614	40,442
1/1/22	36,042	249,960	315,693	42,210
2/1/22	37,760	262,698	323,673	43,370
3/1/22	39,501	276,000	335,072	45,511
4/1/22	37,117	254,849	341,373	47,542

5. In Anejo 2, "mensuales", the data is incorrect in cells H14 and I14, which throws off much or all of the other data regarding 2021.

   The error is that the data in these cells should refer to the *end of (December) 2021*, and they erroneously refer to the *beginning of (January) 2021*.

   Specifically, the data in tab "mensuales" shows 33,896 "Cuentas Facturadas" as of December 2021, yet the number shown in cell H14 that is labeled "Cuentas Facturadas (a diciembre)" shows 20,622.

6. In Anejo 2, "gráficos", there's a chart labeled "Medicion Neta – Clientes y Capacidad"

   This chart shows almost 50,000 "Clientes" as of April 2022.

   This appears to be based on the data from tab "mensuales" in cell J151, "Clientes Registrados", which is 47,542.

   It's unclear to what extent the "Clientes Registrados" number is meaningful or meaningless. On tab "mensuales", the description in cell B151 says:

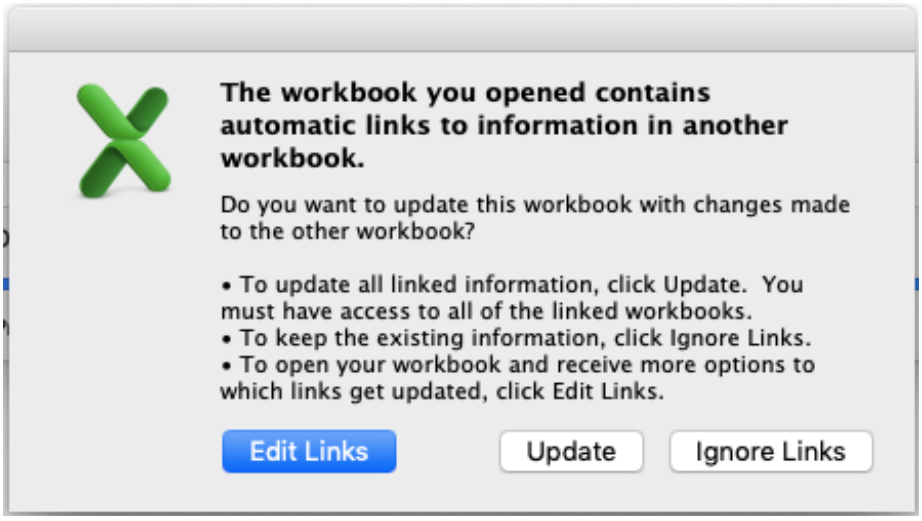
   "1. Registrados significa registrados en CC&B pero que no se facturaron en el mes por diferentes razones, tales como servicios terminados."

   …so if this number of 47,542 is either meaningless or else way less meaningful than the number of "Cuentas Facturadas", why not use the number of 37,117 from cell C151?

   Note: One question that comes up commonly is "How many net metered systems exist today in Puerto Rico".

   What's the answer to that question?

7. The file “Anejo 1 Datos-NEPR-MI-2019-0016.xlsx” appears to be corrupted. Depending on which versión of Excel the file is attempted to be opened in, various error messages pop up, including:



….this means that stakeholders either can’t access the information at all in this file, or else if they can, it’s unclear to what extent the data is accurate.

Can LUMA re-submit this file in a non-corrupted format?

8. On the file “Anejo 1”, tab “Dashboard”, rows 58-109 refer to the number and capacity of “MEDICION NETA – CLIENTES” as based on the “Clientes Registrados” data from Anejo 2.

   Is the number of “Clientes Registrados” significant at all? If it more significant than the number of “Cuentas Facturadas”? If so, why? And to what extent?

9. On the file “Anejo 1”, tab “x”, it refers to “Cumplimiento” with the “Cartera de Energia Renovable”, and shows 3.26% cumplimiento for 2020 and 3.78% cumplimiento for 2021.

   Note: The required rule for enforcement of the RPS (Cartera de Energia Renovable) has not yet been established, which would establish many important factors needed in order for compliance to be deemed, or “% compliance”. One of those necessary factors is whether the % requirement (for example the 40% - by – 2025 requirement) would be required by the first day of 2025, the last day or 2025, or an average throughout the year. Different jurisdictions define that factor, and many other factors, differently around the nation.

   But one factor that’s always required is some sort of REC registry to exist, with one REC = 1 Megawatt hour of renewable energy generated, however “renewable energy” is defined in that jurisdiction. The utility then uses RECs to demonstrate compliance by “retiring” those RECs (which they have purchased, normally from large utility scale projects as well as distributed generation), in representation of the amount of renewable energy generated on their power grid. Normally those RECs are retired in a 3rd party administered registry, which has not yet been established in Puerto Rico.

This same data presented on this slide could be presented and rephrased in a way that is useful and informative, but makes it clear that "compliance" is not being claimed.

Additionally, stating a number for "% compliance" isn't meaningful, because what it really attempting to be reflected here is "% of total generation that was renewable energy".

As an example, if it was the year 2025 and the legal requirement was for 40% renewable energy, and the utility was at 39% renewable energy, then they would be 100 – (40 – 39)/40) = 97.5% "in compliance" (if the associated RECs had been acquired and retired), not 39% "in compliance".

10. On the main presentation, Slide 12, in small text at the middle bottom of the slide it says:

> **" Nota:** De los casos pendientes entre febrero y abril; 2,007 son expeditos (97.75%). De estos, 700 casos tienen más de 30 días en espera. Casos expeditos con 30 días o más en espera representan un 34.87%. "

Question: When determining to what extent LUMA is in compliance with the Automatic Interconnection & 30-day Net Metering requirements of Law 17, which number is to be used?

If the number in this footnote is to be used, then compliance would be 100 – 34.87 = 65.13%

But if the information from the chart on slide 5 is used (which is from data on Anejo 1, tab Dashboard, cells B19, B20, and B21), then LUMA is in 92% compliance.

Promedio para autorización de interconexión	**14 días**
Clientes conectados en menos de 30 días	**92%**

11. Regarding correlating the data in this report with the update spreadsheets posted on LUMA's website, at this website: https://lumapr.com/residencial/energia-renovable/ (click on "proyectos en proceso"):

The data posted on the LUMA website is very helpful, much appreciated, and they updated often (every 2 weeks or so). In this spreadsheet report there is a column called "Visible Status", and "Recently Approved" is one of the statuses shown.

The LUMA explanation on the spreadsheet for this status is: "These cases have gone through an external process from the portal where the client will be receiving the benefit of net metering in their bill. These cases will remain open in the portal while LUMA concludes the study process of the interconnections' impacts to the grid."

Questions about this:

Once a customer has "Recently Approved" status in this LUMA report, does this mean 100% of the time that they already have net metering in place, LUMA is already tracking the kWh of solar energy being sent to the grid, and those kWh will be reflected on the customer's next electric bill? Ie, that the standard bill has at that time already been replaced for the net-metering bill which tracks sent and received kWh and credits?

If the answer is "no", what is the timeframe from the status update of "Recently Approved" on the update spreadsheet on the LUMA website, between when the status shows of "Recently Approved" and when the customer to actually has net-metering active and tracking visible on their bill (net-metering bill)?

If the answer is "not 100% of the time", then what percentage of the "Recently Approved" already have it active at the time "Recently Approved" status approves on the update spreadsheet?

12. Law 17 also requires that solar systems above 25kW in size to be approved by the utility within 90 days.

Questions:

How is LUMA doing with compliance with those systems?

Could compliance with the 90 day requirements for those size systems be added to this quarterly Net Metering & Interconnection compliance report?

For reference, from an unofficial English translation of Law 17-2019:

Section 3.9.- Section 9 of Act No. 114-2007, as amended, is hereby amended to read as follows:

"Section 9- Public Policy on Interconnection…"
… 3rd paragraph:

"Contractor shall evaluate the application for interconnection as established in the interconnection regulations. Such evaluation, however, shall not exceed ninety (90) days from the filing thereof as established in the regulations approved by the Energy Bureau. In the event of noncompliance with the term provided, the application for interconnection shall be automatically approved until the Authority, its successor, or the transmission and distribution network Contractor, as appropriate, provides the grounds for denying the interconnection or deems necessary to implement additional technical requirements and/or improvements to the electric power distribution system. In these cases, the applicant shall be entitled to challenge such a determination or findings through any of the processes provided through regulations on review resources or procedures relating to the interconnection of a distributed generator approved by the Energy Bureau.

Nothing prevents the subsequent review of the correction of the certification issued by an electrical

engineer or an expert electrician, both members of their professional associations and admitted to the practice of their profession."

Conclusion

Thank you for consideration of these questions & comments.

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