

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

NEPR

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IN RE:
INTERCONNECTION REGULATIONS

CASE NO.: NEPR-MI-2019-0009

SUBJECT: Request for Extension to Submit Additional
Comments and of Attendant Public Comment Period

**MOTION REQUESTING EXTENSION TO SUBMIT ADDITIONAL COMMENTS AND
OF ATTENDANT PUBLIC COMMENT PERIOD**

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:

1. On July 15, 2021, this Puerto Rico Energy Bureau of the Public Service Regulatory Board (“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 Interconnection Regulation Draft”) to govern the interconnection of distributed generators and inviting LUMA and other stakeholders to provide comments to this Preliminary Interconnection Regulation Draft, on or before July 30, 2021, before initiating a formal rulemaking procedure.

2. On July 30, 2021, LUMA submitted preliminary comments to the Preliminary Interconnection Regulation Draft. See LUMA’s *Motion Submitting LUMA’s Comments to Preliminary Draft of Proposed Generating Facility and Microgrid Interconnection Regulation* of that date.

3. On November 15, 2021, LUMA submitted additional comments to the Preliminary Interconnection Regulation Draft which were included as proposed revisions or narrative comments marked on the draft.¹ See LUMA’s *Motion to Submit Additional Comments to Preliminary Draft of Proposed Generating Facility and Microgrid Interconnection Regulation* of that date (“November 15th Motion”). LUMA proposed that the provisions containing detailed technical requirements for interconnection be removed from the Preliminary Interconnection Regulation Draft and be included in a separate document of “Technical Interconnection Requirements” (“TIR”) and submitted a preliminary draft of this proposed document (“Preliminary Draft TIR”). See November 15th Motion, pages 3-4.

4. On May 19, 2022, LUMA submitted to the Energy Bureau a more comprehensive draft TIR (“Proposed Comprehensive TIR”). See *Motion Submitting Complete Version of Technical Interconnection Requirements Document* of that date (“May 19th Motion”). LUMA explained that, although the Proposed Comprehensive TIR addressed the subject of smart inverters, further elaboration was required to address the complex subject of smart inverter settings in this document. LUMA also informed this Energy Bureau that after going through the rigorous process of drafting the Proposed Comprehensive TIR as a complementary document to the Preliminary Interconnection Regulation Draft, LUMA had additional comments to the Preliminary Interconnection Regulation Draft, particularly with respect to the subjects of DG evaluations,

¹ On October 15, 2021, LUMA had requested this Energy Bureau, to provide LUMA until November 15, 2021, to submit additional and more detailed comments to the Preliminary Interconnection Regulation Draft. See LUMA’s *Motion Requesting Additional Time to Submit Additional Comments to Preliminary Draft of Proposed Generating Facility and Microgrid Interconnection Regulation* of that date.

supplemental study cost values, and DG interconnection capacity cap per feeder and that LUMA planned to submit these comments at the appropriate time.

5. On September 9, 2022, the Energy Bureau issued a Resolution and Order (“September 9th Order”) requiring LUMA to file the additional comments mentioned by LUMA in the May 19th Motion “regarding the subjects of DG evaluations, supplemental study cost values, and DG interconnection capacity cap per feeder” (“Additional Comments”) on or before October 7, 2022. In addition, the Energy Bureau requested stakeholders and other interested persons to provide comments on the version of the Preliminary Interconnection Regulation Draft containing LUMA’s comments, the Proposed Comprehensive TIR document and the Additional Comments by October 21, 2022.

6. Following receipt of the September 9th Order, LUMA diligently commenced the coordination efforts to prepare the Additional Comments. However, as the Energy Bureau is aware, on Thursday, September 15, 2022, the announcement of the imminent passage of then Tropical Storm Fiona (later classified as a hurricane) through Puerto Rico was made by the United States National Weather Services and, as a result, LUMA’s Emergency Operations Center (LEOC) was activated in compliance with LUMA’s Emergency Response Plan. The activation of the LEOC requires the engagement of many key personnel and components of the company in response to the emergency situation. LUMA personnel involved in the preparation of the Additional Comments form part of the LEOC; therefore, their activation required them to devote their attention primarily to the emergency and resulted in encumbering their ability to finalize the tasks associated with the preparation of the Additional Comments. Given the unrelenting urgency to complete restoration of electric service to all customers, the LEOC continued activated after the

passage of Hurricane Fiona and remains activated to this date. In total, as of this date, the LEOC has been in continuous state of activation for twenty-five (25) days, and this situation will likely persist for some time. This situation substantially reduced the time LUMA personnel had available to prepare the Additional Comments.

7. As a result of the aforementioned unavoidable delay, LUMA respectfully anticipates that it will need at least twenty-five (25) additional days to complete the Additional Comments in a thorough and responsible manner. Therefore, LUMA respectfully requests this honorable Energy Bureau to grant LUMA until November 1, 2022 to submit the Additional Comments. LUMA also requests this honorable Energy Bureau to extend the attendant deadline to submit public comments to the Preliminary Interconnection Regulation Draft, the TIR and the Additional Comments to thirty (30) days following the extended deadline for the submittal of the Additional Comments.

WHEREFORE, LUMA respectfully requests this honorable Energy Bureau to **take notice** of the above, and grant LUMA until November 1, 2022 to file the Additional Comments and to extend the attendant deadline for public comments on the Preliminary Interconnection Regulation Draft, TIR and Additional comments for thirty (30) days thereafter.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 7th day of October 2022.

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



DLA Piper (Puerto Rico) LLC
500 Calle de la Tanca, Suite 401

San Juan, PR 00901-1969
Tel. 787-945-9107
Fax 939-697-6147

/s/ Laura T. Rozas
Laura T. Rozas
RUA Núm. 10,398
Laura.rozas@us.dlapiper.com