

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

**NEPR**

**Received:**

**Apr 9, 2024**

**4:24 PM**

**IN RE:**

**INTERCONNECTION REGULATIONS**

**CASE NO. NEPR-MI-2019-0009**

**SUBJECT: Notice of Intent to Submit Response to  
Urgent Request filed by SESA on April 4, 2024**

**NOTICE OF INTENT TO SUBMIT RESPONSE TO URGENT REQUEST FILED BY  
SESA ON APRIL 4, 2023**

**TO THE PUERTO RICO ENERGY BUREAU:**

**COME NOW LUMA Energy ServCo, LLC and LUMA Energy, LLC** (collectively “LUMA”), through the undersigned legal counsel, and respectfully state and request the following:

1. On April 4, 2024, the Solar and Energy Storage Association of Puerto Rico (“SESA”) submitted to this Puerto Rico Energy Bureau of the Public Service Regulatory Board (“Energy Bureau”) a letter regarding an *Urgent Request Regarding LUMA’s Publication of a “Smart Inverter Settings Sheets- Technical Bulletin”/ NEPR-MI-2019-0009* (“SESA’s Request”). In it, SESA objects to the validity of a Technical Bulletin published by LUMA on April 1, 2024 in its official website titled “Smart Inverter Settings Sheets- Technical Bulletin” (the “Technical Bulletin”) in which LUMA requires compliance by distributed generators with the IEEE 1547-2018 standard for smart distributed energy resources settings. SESA also requests the Energy Bureau to intervene and grant the remedies described in SESA’s Request. SESA further urges the Energy Bureau to take action on or before Friday April 5, 2024 to ensure a “smooth and equitable implementation process” of the IEEE 1547-2018 standard.

2. LUMA respectfully submits that, although it values SESA’s input and collaboration, it disagrees with SESA’s conclusion on the validity of the Technical Bulletin and

objects to the proposed actions SESA proposes. LUMA would like to have an opportunity to provide its position on this matter, including explaining the basis for the Technical Bulletin and providing proper context on its implementation. LUMA respectfully understands it is important for this honorable Energy Bureau to take into account this information before acting upon SESA's Request. LUMA intends to meet with SESA today to clarify questions on said Technical Bulletin.

3. For such purposes, LUMA is in the process of preparing a Response to SESA's Request, which LUMA anticipates will be submitting to the Energy Bureau within the next seven (7) business days. LUMA emphasizes the need for this Honorable Energy Bureau to review LUMA's forthcoming response and for LUMA to have an opportunity to be heard before any action regarding SESA's Request is taken.

**WHEREFORE**, LUMA respectfully requests the Energy Bureau to (i) **take notice** of the aforementioned; and (ii) **grant** LUMA until April 18, 2024 to file its response to SESA's Request.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 9<sup>th</sup> day of April 2024.

We hereby certify that we filed this motion using the electronic filing system of this Puerto Rico Energy Bureau and that copy of this motion was notified to SESA at javrua@sesapr.org.



**DLA Piper (Puerto Rico) LLC**  
500 Calle de la Tanca, Suite 401  
San Juan, PR 00901-1969  
Tel. 787-945-9147  
Fax 939-697-6147

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