

**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 to Reschedule Technical Conference set for May 16, 2024

**MOTION TO REQUEST THE RESCHEDULING OF THE TECHNICAL CONFERENCE
SET FOR MAY 16, 2024**

TO THE PUERTO RICO ENERGY BUREAU:

COMES NOW, LUMA ENERGY SERVCO, LLC (“LUMA”), through the undersigned legal counsel and respectfully states and requests the following:

1. On July 15, 2021, this Honorable Puerto Rico Energy Bureau (“Energy Bureau”) issued a Resolution and Order (“July 15th Order”) notifying that it had developed a draft for a new comprehensive interconnection regulation (titled *Generating Facility and Microgrid Interconnection Regulation*) (“Draft Interconnection Regulation”) to govern the interconnection of distributed generators and inviting LUMA and other stakeholders to provide comments to this Draft Interconnection Regulation.

2. On July 30, 2021, LUMA submitted preliminary comments to the Draft Interconnection Regulation. 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 Draft Interconnection Regulation. 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”). Among others, and in pertinent part, in the November 15th Motion LUMA proposed that the provisions containing detailed technical requirements for interconnection be removed from the Draft Interconnection Regulation and be included in a separate technical document, Technical Interconnection Requirements (“TIR”), for review and approval by the Energy Bureau separately from the proposed regulation. *See* November 15th Motion at pages 3-4. Accordingly, in its November 15th Motion, LUMA submitted, as Exhibit 2 thereof, a preliminary draft of the TIR document that would be proposed for separate review and approval by this Energy Bureau. *See id.*

4. On May 19, 2022, LUMA submitted to the Energy Bureau a more complete version of the TIR document. *See, Motion Submitting Complete Version of Technical Interconnection Requirements Document*, Exhibit 1.

5. Throughout the course of the case, the Energy Bureau received additional comments regarding the (“Preliminary Interconnection Regulation Draft”) and the TIR document from various associations and individuals.

6. On April 4, 2024, the Solar and Energy Storage Association of Puerto Rico (“SESA”) submitted to the 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”), objecting to the validity of a Technical Bulletin published by LUMA on April 1, 2024 in its official website with the mentioned title (the “Technical Bulletin”) and requesting the Energy Bureau to intervene and grant the remedies described in SESA’s Request.

7. On April 9, 2024, LUMA requested the Energy Bureau to provide LUMA until April 18, 2024, to submit its response to SESA’s Request. *See Notice of Intent to Submit Response to Urgent Request Filed by SESA on April 4, 2024* (“April 9th Motion”).

8. On April 15, 2024, the Energy Bureau issued a Resolution and Order (“April 15th Order”) indicating that it had received the SESA Request and LUMA’s April 9th Motion and granting LUMA and the Independent Consumer Protection Office until April 20, 2024, to present their position regarding SESA’s Request. *See* April 15th Order on pages 2 and 3.

9. In the April 15th Order, the Energy Bureau also indicated that it had received comments on the Draft Interconnection Regulation and the TIR document submitted by LUMA (referred to by the Energy Bureau as the “Manual of Technical Requirements for Interconnection” (“TIR Manual”). *See id.* at page 2. The Energy Bureau further indicated that it received a study conducted by a student in the University of Puerto Rico Mayaguez Campus “regarding the possible alternatives to prevent or postpone having to conduct improvements to feeders to mitigate the effects of DGs” and that it had made it form part of the administrative record. *See id.* at page 3. The documents relating to this study are comprised of a presentation and a thesis both titled “Increasing Hosting Capacity of Distribution Feeders Through Energy Storage and Smart Inverter Functions”. *See id.* at page 2, footnote 12.

10. Furthermore, in the April 15th Order, the Energy Bureau scheduled a Technical Conference for May 16, 2024, at 10:00 a.m. (the “Technical Conference”) “to discuss, among other things, the suitability of using the 15% criteria¹ or in the alternative any other less onerous but safe criteria, to require a supplementary study to the [Distributed Generation (“DG”)] proponents and the measures proposed by LUMA, in the [TIR] Manual and/or the [Technical] Bulletin, to reduce or manage the operational challenges of the high penetration of DGs and avoid or postpone having

¹ Presumably referring to the requirement that Supplemental Studies be required for DGs interconnecting to a feeder that exceeds 15% of its annual peak load, which is included in the Puerto Rico Electric Power Authority’s Regulation to Interconnect Generators to the Electric Distribution System of the Electric Power Authority and Participate in the Net Metering Programs, Regulation 8915 (*see* Regulation 8915, Section IV, Art. A, Parr. 4), as well as the Preliminary Interconnection Regulation Draft (*see* Draft Interconnection Regulation, Section 1.28(B)).

to make improvements in the distribution network”. *See id.* at pages 2-3 (footnote added; translation ours). The Energy Bureau also ordered LUMA to appear at the Technical Conference and to: “ensure that all the representatives involved in the pertinent documents are available; [...] that said representatives be ready to respond to questions that the Energy Bureau’s personnel and/or Commissioners may have; and [...] timely present a copy of any Power Point presentation, images or materials that LUMA may have the intention of using during the Technical Conference”. *See id.* at page 3 (translation ours).

11. In preparing for the Technical Conference, LUMA has identified the key individuals with most knowledge on technical interconnection requirements and/or involved in the preparation of the TIR Manual or the Technical Bulletin to participate in the Technical Conference, as required by the April 15th Order. Among these is a subject matter expert who has vast knowledge of the Technical Bulletin and the topics discussed in the April 15th Order. However, this subject matter expert is not expected to be available on the scheduled date of the Technical Conference because he will be on extended work leave. Given his background and knowledge, this subject matter expert’s attendance at the Technical Conference is vital to ensure LUMA is most thoroughly prepared to answer the Energy Bureau’s questions as required by the April 15th Order.

12. In view of the foregoing, LUMA respectfully requests this Honorable Energy Bureau to reschedule the Technical Conference to June 11, 2024, when LUMA’s key subject matter expert will be back from his work leave and available to attend. Although LUMA’s preferred date is June 11, 2024, at 10:00 am, LUMA provides the following alternative dates when LUMA’s team, including LUMA’s key subject matter expert, will also be available: June 13, 2024, and June 18, 2024, at 10:00 am.

WHEREFORE, LUMA respectfully requests this Honorable Energy Bureau to **take notice** of the above and **grant** LUMA's request to **reschedule** the Technical Conference to June 11, 2024, or in the alternative, for any of the remaining dates and times offered in paragraph 12 of this Motion.

RESPECTFULLY SUBMITTED.

I hereby certify that I filed this motion using the electronic filing system of this Energy Bureau and that I will send an electronic copy of this motion to agustin.irizarry@upr.edu, javrua@sesapr.org, contratistas@jrp.pr.gov, aconer.pr@gmail.com, john.jordan@nationalpfg.com, PREPA at arivera@gmlex.net and mvalle@gmlex.net and the Independent Consumer Protection Office at, hrivera@jrsp.pr.gov.

In San Juan, Puerto Rico, this 29th of April 2024.



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