

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

NEPR

Received:

Jun 7, 2024

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IN RE:

INTERCONNECTION REGULATIONS

CASE NO.: NEPR-MI-2019-0009

SUBJECT: Request for Agenda for Technical Conference
Scheduled for June 18, 2024

**MOTION REQUESTING AGENDA FOR TECHNICAL CONFERENCE SCHEDULED
FOR JUNE 18, 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 the April 15, 2024, the Puerto Rico Energy Bureau of the Public Service Regulatory Board (“Energy Bureau”) issued a Resolution and Order (“April 15th Order”) scheduling 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 supplemental study to the DG proponents and the measures proposed by LUMA in the [Manual of Technical Requirements for Interconnection submitted by LUMA in this proceeding²] and/or the [Technical Bulletin regarding Smart Inverter

¹ Presumably referring to the requirement that supplemental studies be required for distributed generators (“DG”) 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 in the proposed Generating Facility and Microgrid Interconnection Regulation (“Draft Regulation”) issued by the Energy Bureau on July 15, 2021 (*see* Draft Regulation, Section 1.28(B)).

² See LUMA’s *Motion to Submit Additional Comments to Preliminary Draft of Proposed Generating Facility and Microgrid Interconnection Regulation* filed on November 15, 2021 and LUMA’s *Motion Submitting Complete Version of Technical Interconnection Requirements Document* filed on May 19, 2022.

Settings Sheets published by LUMA on April 1, 2024³], to reduce or manage the operational challenges of the high penetration of DGs and avoid or postpone having to make improvements in the distribution network”. *See* April 15th Order on 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).

2. On April 29, 2024, LUMA filed a *Motion to Request the Rescheduling of the Technical Conference Set for May 16, 2024* (“April 29th Motion”) so that one of LUMA’s key individuals with knowledge on the technical aspects of the subjects mentioned above could be present at the Technical Conference.

3. After other procedural events, on May 13, 2024, this Energy Bureau issued a Resolution and Order (“May 13th Order”) rescheduling the Technical Conference for June 18, 2024 (“June 18th Technical Conference”), as requested by LUMA.

4. To ensure that the LUMA staff attending the June 18th Technical Conference are best prepared to address any potential Energy Bureau questions or concerns, LUMA respectfully requests that this Honorable Energy Bureau provide more specific input on the matters it is seeking to discuss during the Technical Conference, in the form of an Agenda guiding the proceedings during the conference.

³ *See* LUMA’s *Response to Urgent Request Filed by SESA on April 4, 2024* filed on April 22, 2024.

5. This Agenda will also allow LUMA to prepare a more responsive presentation, should it determine to do so, addressing this Energy Bureau's desired areas of discussion, will inure to a more effective hearing process and avoid potential additional efforts from LUMA or this Honorable Energy Bureau related to addressing post-conference any issues or questions raised during the June 18th Technical Conference.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned and **issue** an Agenda for the Technical Conference scheduled for June 18, 2024 on or before June 14, 2024 so that LUMA is afforded reasonable time to prepare for the Technical Conference.

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 7th day of June 2024.



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