

COMMONWEALTH OF PUERTO RICO  
PUBLIC SERVICE REGULATORY BOARD  
PUERTO RICO ENERGY BUREAU

NEPR

Received:

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In Re:  
INTERCONNECTION REGULATIONS

Case no. NEPR-MI-2019-0009

Subject: Technical Bulletin

REQUEST FOR VARIOUS ORDERS REGARDING  
JUNE 18<sup>TH</sup> CONFERENCE AND TECHNICAL BULLETIN

TO THE HONORABLE ENERGY BUREAU:

COMES NOW, the Puerto Rico Solar Energy Industries Association Corp. dba Solar and Energy Storage Association of Puerto Rico (“SESA”), represented by the undersigned legal counsel, and very respectfully prays and requests:

1. On May 9, 2024, LUMA filed a motion titled “URGENT MOTION TO REITERATE REQUEST TO RESCHEDULE THE TECHNICAL CONFERENCE SET FOR MAY 16, 2024” (“LUMA’s Motion 1”) in which it stated that the effective date for the Technical Bulletin would be postponed until July 1, 202[4]<sup>1</sup>. Subsequently, the Technical Bulletin with an effective date of June 1, 2024 was removed from LUMA’s website.<sup>2</sup>

2. On June 12, 2024, the Energy Bureau issued a Resolution (“PREB Resolution”) regarding the June 18<sup>th</sup> Technical Conference and Stakeholder Workshop Agenda in which PREB held that “specific provisions for **smart inverter settings may modify the way the DERs interact with the grid** and warrant coordination with non-utility actors. The orderly activation of grid support functions will require equipment compliant with the IEEE STD 1547-2018 and UL-1741-5B certification. Requiring this equipment has an impact, therefore **it is within public utility commissions jurisdiction to evaluate how and when this requirement is to be effectuated**. Usually, **state**

<sup>1</sup> See LUMA’s Motion 1, at page 7. The July 1, 2023 date referenced in the motion was evidently an error and should read July 1, 2024.

<sup>2</sup> As indicated by LUMA’s legal counsel at the June 18<sup>th</sup> Technical Conference.

**regulatory bodies** provide a forum for stakeholders to evaluate proposed equipment specifications and then adopt requirements for when interconnecting customers are to start using IEEE STD 1547-2018 compliant and UL-1741-SB certified inverters. **Currently the Energy Bureau has not yet adopted such requirement**<sup>3</sup> (emphasis added).

3. On June 17, 2024, SESA filed a motion titled “RENEWED REQUEST REGARDING LUMA’S TECHNICAL BULLETIN” in which it requested the Energy Bureau to (a) order LUMA to remove the Technical Bulletin from its website; (b) clarify that no Smart Inverter Sheets have been approved by the agency; (c) that LUMA’s July 1, 2024 implementation deadline has no effect; and (d) that any smart inverters settings will be subject to the review and approval of the Energy Bureau. The Energy Bureau has yet to rule on SESA’s motion.

4. On June 18, 2024, the Energy Bureau conducted a Technical Conference in which various stakeholders, LUMA as well as Commissioners and members of the Energy Bureau’s staff asked questions and commented several aspects of LUMA’s Technical Bulletin. During the Technical Conference, participants who included PJ Wilson, Gabriel Ferrer, Andrew Cote, Mehran Zamani, Midhat Mafasi, and Gerardo Cosme touched upon modifications that should be made to the Technical Bulletin before it is approved by the Energy Bureau. These suggested changes include the elimination of the VOLT/WATT setting from the Technical Bulletin; the postponement of the July 1 implementation date because it does not provide enough time for the appropriate changes to be made; and modifications to certain terms, among others. Furthermore, LUMA presented a redline version of its Technical Bulletin with certain changes already made, but LUMA also acknowledged that they did not completely review SESA’s commented version of the Technical Bulletin,<sup>4</sup> which of course suggests that not all of the concerns raised by SESA were addressed by LUMA.

5. While the Technical Conference presented a great opportunity to address and discuss the issues, it also showed that various key matters remain unresolved. Such

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<sup>3</sup> See PREB Resolution, at page 1-2.

<sup>4</sup> This document is already part of the proceedings.

uncertainty can adversely impact the continued, orderly deployment of solar assets in Puerto Rico.

6. Under Section 6.3 (w) the Puerto Rico Energy Transformation and RELIEF Act, Act 57-2014, as amended, the Energy Bureau has the authority to review and approve any “proposal to the interconnection regulations and minimum technical requirements (MTRs), additional technical requirements (ATRs), and any other type of requirement established for the interconnection of distributed generators and microgrids to the electric power grid and oversee compliance therewith.” Therefore, SESA respectfully requests the Energy Bureau to clarify that LUMA’s July 1, 2024 implementation deadline has no effect; and that in due course, after the Energy Bureau has received input from stakeholders and the public, it will make a determination regarding the specific smart inverter’s settings and the implementation schedule for the Technical Bulletin.

7. On June 21, 2024 LUMA filed a motion titled “Motion to Submit Presentation Shown at Technical Conference/Stakeholder Workshop Held on June 18, 2024, with Correction and Revised Technical Bulletin”, which still has the proposed July 1st implementation date. Additionally, it is imperative to highlight several unresolved issues. Firstly, despite some modifications indicated in their June 21st filing, the persistence of the Volt-Watt activation requirement remains contentious and is vehemently opposed by SESA and numerous other stakeholders. Secondly, the concerns detailed in SESA’s commented version of the Technical Bulletin, encompassing 29 specific requests for amendments to previous drafts, have yet to receive any response. These concerns range in significance from major to minor but collectively represent critical aspects that require immediate attention before the implementation of the Technical Bulletin.

8. Furthermore, it is evident that there is currently no Smart Inverter Settings document publicly available aside from LUMA's June 21st redline version. As we approach the imminent July 1st deadline, it is crucial to emphasize that the industry requires a minimum of three months following the PREB's review and approval of the Smart Inverter Settings for adequate implementation. This timeline is essential to ensure that the distributed generation industry has sufficient time to adjust and comply with the finalized regulatory framework effectively. Therefore, timely and comprehensive action

from the Honorable Energy Bureau is indispensable to facilitate a smooth and informed transition for all parties involved.

**WHEREFORE**, the Solar and Energy Storage Association respectfully requests the Honorable Energy Bureau to issue a Resolution and Order determining that (a) LUMA's July 1, 2024 implementation deadline has no effect; (b) Technical Bulletins regarding any type of distributed generator interconnection requirement shall be subject to the review and approval of the Energy Bureau; (c) any subsequent publication of LUMA's draft Technical Bulletins shall first be made in docket NEPR-MI-2019-0009; (d) a public notice shall be issued inviting stakeholders and the public to submit their comments regarding the instant Technical Bulletin, as modified and; (e) that after the Energy Bureau receives written input, it will issue a Resolution and Order with its determination regarding the smart inverter settings and the implementation schedule for the Technical Bulletin.

Respectfully submitted, on June 25, 2024, in San Juan, Puerto Rico.

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

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