

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

**IN RE:** INTERCONNECTION REGULATIONS

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

**SUBJECT:** Smart Inverter Default Utility  
Required Settings Profile – Stakeholder  
Comments.

**RESOLUTION AND ORDER**

**I. Relevant Factual Background**

On April 4, 2024, the Solar and Energy Storage Association of Puerto Rico (“SESA”) filed with the Energy Bureau of the Puerto Rico Public Service Regulatory Board (“Energy Bureau”) a document referenced as *Urgent Request Regarding LUMA’s Publication of a “Smart Inverter Setting Sheets-Technical”* in which it made aware that LUMA Energy ServCo, LLC and LUMA Energy, LLC (collectively “LUMA”) had posted in its website Technical Bulletin 2024-0001 Smart Inverter Settings Sheet that purported smart inverter requirements with an effective date of June 1, 2024.

On April 15, 2024, the Energy Bureau issued a Resolution and Order (“April 15 Order”) that scheduled a Technical Conference for May 16, 2024 at 10:00 a.m. to discuss supplementary interconnection study requirements and also smart inverter default utility required profiles as proposed by LUMA in its Technical Bulletin 2024-0001 Smart Inverter Settings Sheet.

On May 9, 2024, LUMA filed a document titled, *Urgent Motion to Reiterate Request to Reschedule the Technical Conference Set for May 16, 2024*, through which LUMA petitioned to reschedule the Technical Conference to June 11, 13, or 18, 2024 to facilitate participation of relevant personnel. This motion also postpones the effectiveness of Technical Bulletin 2024-0001 Smart Inverter Settings Sheet until July 1, 2024.

On May 13, 2024, the Energy Bureau issued an Order (“May 13 Order”) that rescheduled the Technical Conference to June 18, 2024 at 10:00 a.m.

On June 18, 2024, the Energy Bureau held a stakeholder workshop (“June 18 Stakeholder Workshop”) through which issues associated with the adoption of Smart Inverter Settings were discussed.

On June 21, 2024, LUMA filed a document titled *Motion to Submit Presentation Shown at Technical Conference/Stakeholder Workshop held on June 18, 2024, with correction and revised Technical Bulletin*.

On June 25, 2024, SESA filed a document titled *Request for Various Orders Regarding June 18<sup>th</sup> Conference and Technical Bulletin*.

**II. June 18 Stakeholder Workshop<sup>1</sup>**

Representatives from the Independent Consumer Protection Office (“ICPO”), the University of Puerto Rico (“UPR”), SESA, Sunrun , Enphase Energy, GENERAC, the Interstate Renewable Energy Council (“IREC”), AZ Engineering, and LUMA provided robust participation during the June 18 Stakeholder Workshop. There was consensus that the grid support provided by the autonomous functions of smart inverters can facilitate integration of renewable energy

<sup>1</sup> See Energy Bureau’s YouTube channel, available at: <https://youtu.be/MoX9M--04M8> and <https://youtu.be/XLBbQmvfISI> (last visited June 28, 2024).



and increase the stability of the electric system. Nevertheless, several stakeholders shared general concerns about adoption of the proposed Smart Inverter Default Settings Profile.

The planning/operational flexibility afforded by UL-1741-SA and SB certified inverters was also discussed regarding how this functionality could provide much needed support to the bulk power system, *e.g.*, dynamic voltage support, communications interoperability, ground fault overvoltage protection.

During the June 18 Stakeholder Workshop LUMA indicated that an updated smart inverter settings sheet was forthcoming.

### III. Stakeholder Comments

The Energy Bureau **GRANTS** stakeholders **ten (10) business days, from the notification of this Resolution and Order**, to provide detailed, specific and substantiated comments about the enablement/disablement of specific functions and its associated power requirements and UL-1741-SB and SA smart inverter certification.

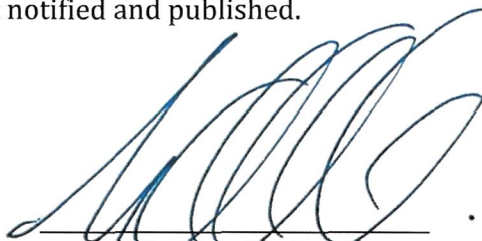
The Energy Bureau **WILL** provide guidance about the adoption of the discussed smart inverter requirements after evaluating the stakeholder comments.

LUMA **SHALL NOT** require modifications to Inverter Settings Profiles for new interconnections until the Energy Bureau provides further guidance.

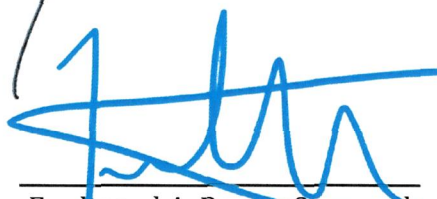
The Energy Bureau **WARNS** LUMA that:

- (i) noncompliance with this Resolution and Order, regulations and/or applicable laws may carry the imposition of fines and administrative sanctions of up to \$25,000 per day;
- (ii) any person who intentionally violates Act 57-2014, as amended, by omitting, disregarding, or refusing to obey, observe, and comply with any rule or decision of the Energy Bureau shall be punished by a fine of not less than five hundred dollars (\$500) nor over five thousand dollars (\$5,000) at the discretion of the Energy Bureau; and
- (iii) for any recurrence of non-compliance or violation, the established penalty shall increase to a fine of not less than ten thousand dollars (\$10,000) nor greater than twenty thousand dollars (\$20,000), at the discretion of the Energy Bureau.

Be it notified and published.

  
Edison Avilés Deliz  
Chairman

  
Lillian Mateo Santos  
Associate Commissioner

  
Ferdinand A. Ramos Seagaara  
Associate Commissioner

  
Antonio Torres Miranda  
Associate Commissioner



## CERTIFICATION

I certify that the majority of the members of the Puerto Rico Energy Bureau agreed on June 28, 2024. Associate Commissioner Sylvia B. Ugarte Araujo dissented with Written Opinion. Also certify that on June 28, 2024, I have proceeded with the filing of this Resolution and Order and was notified by email to mvalle@gmlex.net; arivera@gmlex.net; Valeria.belvis@us.dlapiper.com; julian.angladapagan@us.dlapiper.com; Laura.rozas@us.dlapiper.com; agustin.irizarry@upr.edu; javrua@sesapr.org; hrivera@jrsp.pr.gov; contratistas@jrsp.pr.gov; aconer.pr@gmail.com; John.jordan@nationalpfg.com; pjcleanenergy@gmail.com; cfl@mcvpr.com; gcordero@crmjv.com; Steven.rymsha@sunrun.com; jberdner@enphaseenergy.com; jalmodovar@enphaseenergy.com; markb@enphaseenergy.com; mrosenfeldt@enphaseenergy.com; gferrer@enphaseenergy.com; kkoch@tesla.com; Andrew.Cote@generac.com.

I sign this in San Juan, Puerto Rico, today, June 28, 2024.

  
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Sonia Seda Gaztambide  
Clerk





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PUERTO RICO PUBLIC SERVICE REGULATORY BOARD  
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**IN RE:** INTERCONNECTION REGULATIONS

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

**SUBJECT:** Dissenting Opinion Associate  
Commissioner Sylvia Ugarte Araujo

**Dissenting Opinion Associate Commissioner Sylvia Ugarte Araujo**

After the technical hearing held on June 18, 2024, no more time is necessary to adopt a requirement that would benefit our electric grid and promote further adoption of GDs in a safe and reliable matter. I understand that since 2022 LUMA presented its technical interconnection requirements to the public and it is more than enough time for the proponents to adopt the IEEE STD 1547-2018. In lieu that over 28 states have adopted this standard, there is no reason for Puerto Rico to not adopt such a beneficial standard immediately. The Energy Bureau has allowed reasonable time for all interested parties to express their position and for LUMA to clarify any technical aspects.

It is the responsibility of this Energy Bureau to state the date of implementation as soon as possible. This is not a matter of **if** but a matter of **when**.

I recommend that this standard be adopted immediately using a phase-in approach. For example, Volt-Var can commence immediately, and Volt-Watt can be deferred.

In San Juan, Puerto Rico, on June 28, 2024.

  
Sylvia B. Ugarte Araujo  
Associate Commissioner

