

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

NEPR

Received:

Aug 28, 2024

10:58 AM

IN RE: PLAN PRIORITARIO PARA LA  
ESTABILIZACION DE LA RED  
ELECTRICA

Case No.: NEPR-MI-2024-0005

Matter: Request for Partial Modification  
of Scheduling Order

**MOTION REQUESTING PARTICIPATION BY WINDMAR RENEWABLE ENERGY,  
INC. IN THE “PLAN PRIORITARIO PARA LA ESTABILIZACION DE LA RED  
ELECTRICA DOCKET”**

TO THE PUERTO RICO ENERGY BUREAU:

Now comes Windmar Renewable Energy, Inc. (Windmar) represented by appearing counsel and very respectfully, states and prays as follows:

1. On August 9, 2024 the PREB set a schedule in the present case.
2. Genera PR LLC (Genera) has requested modifications to the established schedule.
3. Windmar is a Puerto Rico Corporation, with a major presence in the energy market in Puerto Rico. It owns utility size solar farms, distributed energy operations in governmental and private enterprises and is the biggest installer and operator of rooftop solar solutions in Puerto Rico.
4. Neither Genera, nor LUMA represents the renewable energy sector in Puerto Rico.
5. Windmar operation includes, as mentioned, utility size, industrial distributed energy and BESS.

6. It is Windmar contention that renewable energy plus storage, BESS, provides stabilization to the Grid and is mor reliable and resilient than other options.

7. Windmar has ample experience defending the interest represented by distributed energy both in front of the PREB and on the Courts, including participation in the PROMESA cases the IRP and Rate cases, among others.

WHEREFORE, it is respectfully requested for Windmar to participate as a full party in this proceeding.

We hereby certify that this motion was filed using the electronic filing system of this Energy Bureau.

Dated: August 27, 2024.  
San Juan, Puerto Rico

Respectfully submitted.

/s/FERNANDO E. AGRAIT

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