

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

NEPR

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IN RE:	CASO NO. NEPR-MI-2019-0016
INFORMES DE PROGRESO DE INTERCONEXIÓN DE LA AUTORIDAD DE ENERGIA ELECTRICA DE PUERTO RICO	SUBJECT: Motion Submitting LUMA's Interconnections Progress Report for October through December 2024 and Supporting Materials

WINDMAR RENEWABLE ENERGY, INC. /PV PROPERTIES COMMENTS TO LUMA'S MOTION SUBMITTING INTERCONNECTIONS PROGRESS REPORT FOR OCTOBER THOUGH DECEMBER 2024 AND SUPPORTING MATERIALS

NOW COMES, Windmar Renewable Energy, Inc./PV Properties (Windmar) represented by appearing counsel and respectfully alleges and prays:

1. Once more LUMA in its ***Interconnections Progress Reports Docket NEPR-MI-2019-0016 February 14, 2025 Motion Submitting Interconnections Progress Report for October through December 2024 and Supporting Material Asunto: Exhibit 1 Motion Subm Int Conn Progress Report TAB x-UPDATE*** claims for Cartera de Energia Renovable-Año Natural 2024, what is better know as Compliance with the legally mandated Renewable Portfolio Standard (RPS), 640 GWH, the equivalent of 640,000 RECs from Net-metering Distributed Generation Customers. LUMA has not paid for the RECs from the DG Net-Metering customers it claims for compliance with the RPS.

2. Furthermore, in its 2.0. Annual Compliance Report, a screen shot of which appears in the x-UPDATE Tab, LUMA claims it only pays \$10.01 per REC (\$4,966,805 divided

by 492,830 RECs). This number is incorrect unless LUMA is paying the value of the RECs when it pays for the Net Energy Output of some of its Utility Scale PPOA. This is not allowed by LAW. The NEO and the REC price are two distinct costs.

3. LUMA purchased from the PPOA's RECs equivalent to 2.3% of distributed energy sales. The RPS for 2024 required 25%. The PPOAs were not able to generate sufficient RECs for compliance. PV Properties offered LUMA the RECs from its DG net-metering generation. LUMA has refused to purchase this Puerto Rico market generated RECs even though it has fallen substantially short of its percentage RPS compliance requirements.

4. By including the DG Net Metering customers' product in the report, LUMA is claiming and exercising ownership of RECs generated by net-metering customers that were exported to the Grid, for which, it has not paid

5. LUMA in the 2.0. Annual Compliance Report claims the 657,769 RECs that Net metering Customers exported to the Grid had a cost of \$122.42 (\$80,524,526 divided by 657,769 RECs).

Who did LUMA pay this \$80 million dollars to, certainly not to the DG Net Metering prosumers.

6. LUMA on exhibit I Tab labeled "Report" indicates the nameplate capacity of the net-metering systems during 2024. The average is 894 MW. Using a yield factor of 1,500 kW/Kwh that capacity is estimated to generate 1,341,344 RECs. Based on that estimated potential generation the net metering customers exported to the Grid 49% of their generation and self-consumed the remaining 51%. The RECs from self-consumption are also available for RPS compliance.

The Number of RECs available for RPS compliance are:

From PPOAs	397,000	or 2.3% of Total Energy Sold
From DG Exported	640,000	or 3.7 % of Total Energy Sold
From DG self-consumed	657,000	or 3.8 % of Total Energy Sold

7. In summary PPOAs and DG customers generated 1,694,000 RECs equivalent to 9.86% of Total Energy Sold.

LUMA has a legal obligation to acquire and pay for the RECs available in the Puerto Rico market up to the percentage of compliance mandated by LAW. LUMA only acquired and paid the RECs from the PPOAs, LUMA acquired and has not paid the RECs that the DG net-metering customers exported, LUMA has refused to purchase the RECs self-consumed by net metering customers.

WHEREFORE, it is respectfully requested:

- a) that the report be amended with the data included, in order to correct included statements
- b) That LUMA provide what it paid for the RECs it purchased from each PPOA supplier,
- c) that LUMA explain how it established the \$85 million cost of net-metering RECs, and;
- d) that it justifies its refusal to pay for the net metering customers exported RECs and its refusal to purchase RECs from net-metering customers.

CERTIFY: I certify that in February 24, 2025 a copy of this motion was notified by electronic mail to jmargarita.mercado@us.dlapiper.com, yahaira.delarosa@dlapiper.com, lionel.santa@prepa.pr.gov, hrivera@jrsp.pr.gov, contratistas@jrsp.pr.gov.

In San Juan, Puerto Rico, on February 24, 2025.

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