

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

NEPR
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In Re: ENERGY EFFICIENCY AND DEMAND
RESPONSE TRANSITION PERIOD PLAN

Case no. NEPR-MI-2022-0001

Subject: Support for rapid approval of
Permanent CBES Program as Proposed

**MOTION TO REQUEST RAPID APPROVAL OF THE PERMANENT CBES PROGRAM
PROPOSAL AS FILED BY LUMA**

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 respectfully states as follows:

1. On February 28th, 2025 SESA filed a motion titled “MOTION TO REQUEST A PROCEDURAL SCHEDULE FOR STAKEHOLDER PARTICIPATION AND COMMENT ON THE PERMANENT CBES PROGRAM PROPOSAL”. In this motion, SESA requested that the Honorable Energy Bureau issue a Resolution and Order (a) establishing a Technical Conference with regards to LUMA’s Permanent CBES program proposal; and (b) a procedural schedule providing ample opportunity for stakeholder participation, which SESA suggested may mirror the procedural schedule established in its February 2023 Resolution and Order.

2. However, given the utmost urgency of the current central generation deficit, and the related persistent outages, which as forecasted by LUMA, will significantly increase during the summer of 2025, SESA foregoes our prior procedural schedule request only if this Honorable Energy Bureau moves swiftly to approve LUMA’s Permanent CBES program proposal, exactly as proposed by LUMA in its filing of January 31st 2025¹.

3. Thus, If the Honorable Energy Bureau is considering any changes to LUMA’s

¹ See *Motion to Submit Permanent Customer Battery Energy Sharing Program Proposal in Compliance with Resolution and Orders of October 23, 2024 and December 5, 2024* in the instant proceeding.

Permanent CBES program proposal, then SESA fully stands by and reiterates its request for a Resolution and Order by this Honorable Energy Bureau (a) establishing a Technical Conference with regards to LUMA's Permanent CBES program proposal; and (b) a procedural schedule providing ample opportunity for stakeholder participation, prior to any changes to LUMA's Permanent CBES program proposal.

4. An Energy Bureau resolution making the current CBES 'pilot' a stable, permanent program, is the only real action that can be taken today to help ameliorate and mitigate outages during the current emergency, as well as in the near and mid-term.

5. Additionally, the current pilot status of the CBES program does not provide the stability and certainty needed for solar and battery companies to effectively educate and market the program's benefits to potential customers at the point of sale. If the Honorable Energy Bureau today approves the CBES as a permanent program, exactly as proposed by LUMA, that point-of-sale obstacle is automatically removed, and the CBES program would start growing rapidly. In this permanent CBES Program, a substantial percentage of the over 4,000 batteries installed monthly could be enrolled in the CBES every month henceforth, maximizing the program's blackout reduction benefits.

6. As no Technical Conference is required by the Honorable Energy Bureau's October 23 Resolution and Order, it is SESA's request that the Honorable Energy Bureau moves swiftly to approve LUMA's Permanent CBES program proposal exactly as filed on January 31st, 2025. A Procedural Schedule and further Stakeholder Engagement would only be fitting if the Energy Bureau were to somehow modify the terms of LUMA's January 31st proposal.

WHEREFORE, SESA respectfully requests that the Honorable Energy Bureau rapidly issues a Resolution and Order approving LUMA's Permanent CBES program proposal exactly as filed on January 31st, 2025. However, if the Honorable Energy Bureau is considering any changes to LUMA's Permanent CBES program proposal, then SESA fully stands by and reiterates its request for a Resolution and Order by this Honorable Energy Bureau (a) establishing a Technical Conference with regards to LUMA's Permanent CBES program proposal; and (b) a procedural schedule providing ample opportunity for stakeholder participation, prior to any changes to LUMA's Permanent CBES program proposal.

Respectfully submitted, on March 27, 2025, 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 hrivera@jrsp.pr.gov;

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