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

IN RE:	**CASE NO. NEPR-MI-2019-0009**
INTERCONNECTION REGULATIONS	**SUBJECT: LUMA's Comments on Subjects Discussed During Smart Inverter Working Group Meetings**

MOTION TO SUBMIT LUMA'S COMMENTS ON SUBJECTS DISCUSSED DURING SMART INVERTER WORKING GROUP MEETINGS

TO THE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy ServCo, LLC and **LUMA Energy, LLC** (collectively "LUMA"), through the undersigned legal counsel, and respectfully state and request the following:

I. Introduction

LUMA is submitting herein its comments on various topics discussed during the third meeting of the Smart Inverter Working Group ("SIWG") held on March 14, 2025, while taking the opportunity to also submit comments on some of the subjects discussed during the first and second meetings of this group, held on February 11, and April 3, 2025, respectively, to support a more complete record in this process. The SWIG was formed, pursuant to a directive of the Puerto Rico Energy Bureau ("Energy Bureau"), to address the implementation and possible modifications of the Smart Inverter Settings Sheets submitted by LUMA to the Energy Bureau on November 15, 2024, and which entered into effect on January 1, 2025. With this objective, the SIWG meetings were scheduled by the Energy Bureau for stakeholders to discuss various subjects set forth by the Energy Bureau relating to these settings.

The Smart Inverter Settings Sheets are a technical guidance aligned with the IEEE 1547-2018 standard for interconnection and interoperability of distributed energy resources ("DERs") and designed to enhance compliance with the Regulation to Interconnect Generators to the Electric Distribution System of the Electric Power Authority dated February 6, 2017, Regulation No. 8915. These settings were established to ensure smart inverters meet standards for grid support and operational efficiency and include adjustments to default settings, which aim to improve the integration and functionality of DERs within Puerto Rico's electric distribution system. These settings are part of a much-needed integrated approach to maintain grid safety and reliability.

I. Relevant Procedural History

1. On November 7, 2024, the Energy Bureau issued a Resolution and Order ("November 7th Order") approving, among others, the Smart Inverter Settings Sheets submitted by LUMA on September 17, 2024[1], with the following modification:

> LUMA shall modify the Table 2-7 (Volt-Watt Settings) to reflect as "Activated" and shall modify the corresponding footnote (3) to read as follows:
>
> > (3) Will remain Deactivated for at least 6 months. Not earlier than June 30, 2025, the Energy Bureau will consider approving, through Resolution, the activation of this function after considering: (i) recommendations from LUMA and Working Group regarding system performance, (ii) implementation of adequate reporting and tracking requirements for customer curtailment, and (iii) LUMA has developed an effective plan to manage distribution voltage, that relies on Volt-Watt functionality as a last resort mechanism to temporarily correct voltage issues.

See November 7th Order, p. 6. The Energy Bureau also ordered LUMA to, within five (5) business days of the notification of the November 7th Order, file the final version of the Smart Inverter

[1] *See Motion to Submit Revised Technical Bulletin regarding Smart Inverter Settings Sheets and Request to Substitute Exhibits 1 and 2 Submitted on September 13, 2024.*

Settings Sheets reflecting the above modification and to make the modified Smart Inverter Settings effective January 1, 2025. *See id*.

2. In the November 7th Order, the Energy Bureau also established a "Smart Inverter Working Group [("SIWG")] process […,] to address the implementation and possible modifications to the approved Smart Inverter Settings Profile" and directed the SIWG to discuss a list of issues set forth in the November 7th Order in three virtual meetings to be held on November 21, 2024, January 14, 2025, and March 11, 2025, respectively. *See id*., pp. 6-7. The Energy Bureau set forth the following general subjects for discussion during these meetings: the EPRI common file format (IEEE 1547.1-2020, Annex B) and customer protections for system curtailment, during the first meeting; high voltage management, normal ramp up rate specifications, and the development of site-specific utility-required settings profiles, during the second meeting; and the compensation structure for grid services, during the third meeting. See id., pp. 6-7. The Energy Bureau also indicated that it would timely issue an agenda before these virtual meetings and established the deadlines of December 11, 2024, February 4, 2025, and April 1, 2025, to submit comments following each meeting, respectively. *See id*.

3. On November 15, 2025, LUMA submitted to the Energy Bureau the final version of LUMA's Technical Bulletin 2024-0001 regarding the Smart Inverter Settings Sheets in compliance with the November 7th Order and requested the agenda for the first SIWG meeting. *See Motion to Submit Final Technical Bulletin Regarding Smart Inverter Settings Sheets in Compliance with Resolution and Order of November 7, 2025, and Request for Agenda for Workshop Scheduled for November 21, 2024*.

4. On November 18, 2024, the Energy Bureau notified the agenda of the first SIWG virtual meeting scheduled for November 21, 2024, via Notice to LUMA and other stakeholders.

5. On November 21, 2025, the first SWIG meeting was held.

6. On January 13, 2025, the Energy Bureau issued a Resolution ("January 13th Resolution") rescheduling the second SIWG virtual meeting to February 11, 2025, and changing the associated deadline to submit comments to March 4, 2025, while maintaining the date of March 11, 2025 for the third virtual meeting. *See* January 13th Resolution, p. 1.

7. On February 11, 2025, the second SIWG meeting was held.

8. On March 10, 2025, the Energy Bureau issued a Resolution ("March 10th Resolution") in which it rescheduled the third SIWG virtual meeting to April 2, 2025 and provided an agenda for the meeting. *See id*., p. 1. The Energy Bureau also revised the deadline to submit comments following this third meeting to April 25, 2025. *See id.* In addition, the Energy Bureau explained that once the cycle of meetings concludes, "the Energy Bureau will evaluate all submitted comments and make any determination to postpone or modify smart inverter settings based on the record." *See id*.

9. On April 2, 2025, the third SIWG virtual meeting was held.

II. Submittal of Comments

8. In accordance with the November 7th Order and March 10th Resolution, LUMA submits its comments on the subjects discussed during the third SIWG virtual meeting held on April 2, 2025, as well as related subjects discussed in the first and second SIWG virtual meetings, held on February 11, and April 3, 2025, respectively. *See Exhibit 1*. LUMA is also including comments on some of the subjects discussed during these previous meetings to ensure a more complete record in this process, given that some of these subjects are related to matters discussed during the third meeting and/or LUMA has developed a more concrete position on these subjects following the conclusion of all mandated workshops. LUMA respectfully submits that, with this

wholistic set of comments, the Energy Bureau will have a more robust record of information on which to base its determinations. LUMA may submit additional comments on this topic at a later date.

WHEREFORE, LUMA respectfully requests this Honorable Energy Bureau to **take notice** of the above and **accept** LUMA's comments on the subjects discussed during the third SIWG meeting held on April 3, 2025, as well as some of the subjects discussed during the first and second SWIG meetings held on February 11, and April 3, 2025, respectively, included in *Exhibit 1* herein.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 25th day of April 2025.

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 will be notified to hrivera@jrsp.pr.gov; arivera@gmlex.net; mvalle@gmlex.net; agustin.irizarry@upr.edu; javrua@sesapr.org; contratistas@jrsp.pr.gov; aconer.pr@gmail.com; john.jordan@nationalpfg.com; cfl@mcvpr.com; and mqs@mcvpr.com.

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Exhibit 1

LUMA's Comments on Subjects Discussed during SIWG Meetings

Comments on Smart Inverter Settings Workshop

NEPR-MI-2019-0009

April 25, 2025

Introduction

The Smart Inverter Working Group (SIWG) was established by the Puerto Rico Energy Bureau through a Resolution and Order, requiring LUMA's participation to support the implementation of enhanced inverter requirements for distributed energy resources. Central to this effort is the Smart Inverter Technical Bulletin 2024-001 (*Technical Bulletin 2024-001*), submitted by LUMA on November 15, 2024, and made effective on January 1, 2025. This bulletin formalizes the adoption of default smart inverter settings based on IEEE Std. 1547-2018 and provides the technical foundation for the interconnection of inverter-based DERs in Puerto Rico. The SIWG workshops have focused on evaluating these settings, addressing stakeholder feedback, identifying high-voltage concerns, and advancing strategies to strengthen grid reliability in response to increasing distributed generation penetration.

LUMA submits comments addressing certain matters discussed during the three SIWG workshops, all of which were scheduled pursuant to the Energy Bureau's Resolution and Order of November 7, 2024. As mandated, stakeholders, including LUMA, engaged in structured discussions concerning the adoption of default smart inverter settings, high-voltage management and site-specific inverter configurations.

This filing sets forth LUMA's position on key issues discussed during the SIWG workshops, including the basis for non-purchase of power needed to protect the grid, the need for additional transparency of operational data, and the justification for refining smart inverter settings.

Through this filing, LUMA seeks to clarify its approach, reaffirm its commitment to compliance with applicable requirements, and contribute meaningfully to the continued enhancement of Puerto Rico's energy infrastructure. By actively participating in these proceedings, LUMA supports the responsible integration of Distributed Energy Resources (DER) while safeguarding system stability, reliability, and safety.

1.0 Smart Inverter Settings and Implementation Timeline

1.1 Statement of Position

LUMA acknowledges that the default settings outlined in the Technical Bulletin 2024-001 may require updates to better reflect site-specific system conditions. LUMA supports revisions and a phased implementation approach, provided these changes are informed by actual system data and aligned with technical feasibility.

1.2 Discussion and Rationale

Stakeholders recommended a phased or delayed implementation of the default smart inverter settings. LUMA recommended revisiting certain settings six months after the implementation of Technical Bulletin 2024-001, which formally adopted the IEEE 1547-2018 default settings for Puerto Rico. LUMA acknowledges that certain IEEE 1547-2018 default settings require tailoring to the unique operational characteristics of Puerto Rico's grid and will propose targeted revisions accordingly. This effort aligns with broader proposals LUMA has submitted in related proceedings, where LUMA recommended updating DER study thresholds and integrating inverter settings as part of a long-term grid planning strategy[1].

At present, the LUMA distribution grid hosts over 145,000 Distributed DER systems interconnected at the distribution voltage level, representing more than 1 GW of installed capacity. These resources constitute the largest source of uncontrollable, must-take energy on the island, significantly exceeding the contribution from utility-scale renewable generation.

The growth of DER installations has accelerated noticeably over the past three years, under the regulatory framework established under Act 17-2019, which grants automatic interconnection rights to DER systems under 25 kW. No other U.S. jurisdiction grants this level of interconnection access without prior engineering review. As a direct result, these small-scale systems comprise approximately 99.5% of all DER interconnections to date.

LUMA has made substantial progress in studying the operational impacts of DER integration. Using a feeder-based clustering methodology, LUMA has conducted impact assessments on approximately 70,624 DER installations across 769 feeders, as of April 1, 2025. These results, summarized in *Table 1,* highlight the scope of system upgrades needed to mitigate feeder-level violations attributable to DER proliferation[2].

[1] *See Motion to Submit LUMA's Position Regarding Modification of Threshold to Require Supplemental Studies under Regulation 8915, NEPR-MI-2019-0009 (Sept. 5, 2024).*

[2] The final number will vary, as field-inspections are made to perform estimates and make corrections of the model.

Comments on Smart Inverter Settings Workshop

Table 1: Total Identified Upgrades, as of April 1, 2025

Upgrade	Quantity
Service Transformers	772
Capacitor Banks (replace with communicating, controllable devices)	652
Voltage Regulators	17
Feeder Segment	12
Switch	4

These identified upgrades illustrate the significant infrastructure adjustments necessary to accommodate continued DER growth while maintaining system reliability. Proper implementation of smart inverter settings, including Volt-Var, and frequency ride-through modes, is necessary to prevent DER systems from exacerbating existing voltage and reliability challenges. Compliance with these settings ensures that these systems mitigate their operational impacts rather than contribute to system violations. Therefore, smart inverter compliance is an essential requirement to maintain grid stability as DER penetration continues to increase. As an example, *Figure 1* and *Table 2* illustrate and summarize the conditions that were observed in one of the feeders during feeder impact studies.

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Figure 1: Sample Feeder Output Voltage During MNL Conditions showing high voltage (red)

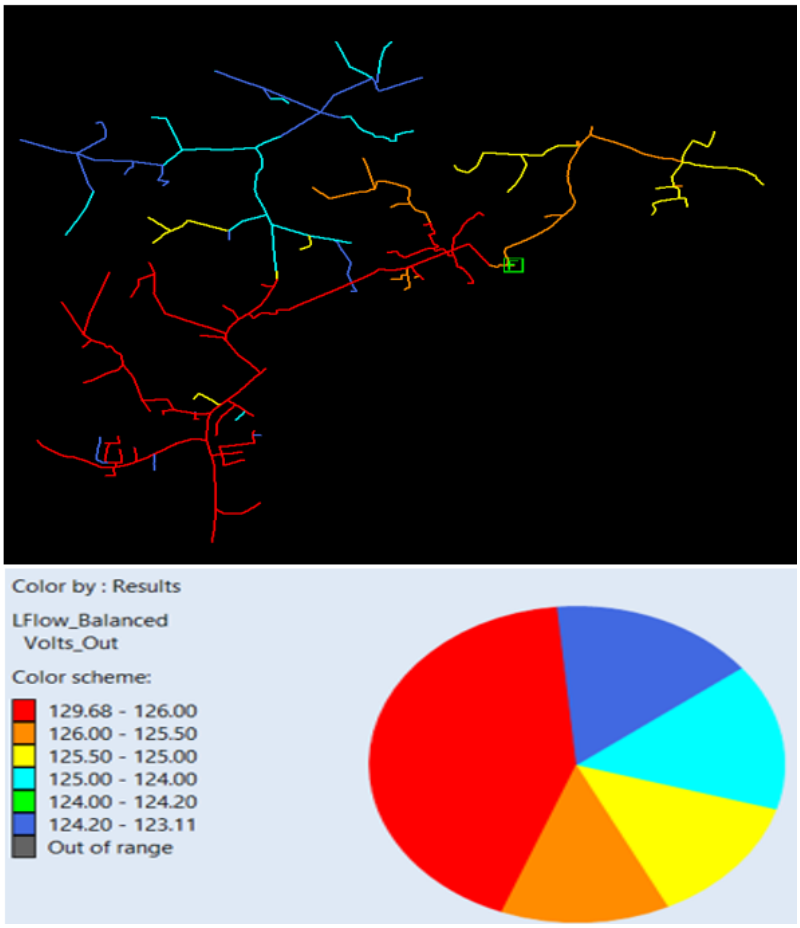

Table 2: Sample Feeder Output Voltage - Study Results Summary

Study Results - Summary	
Feeder Voltage Level	7.2 kV
Total Feeder Length	23.1 miles
Total Aggregated DER AC Capacity	759 kW
Total DERs Studied	128
DER Penetration Level	34%

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Study Results - Summary	
Feeder Peak Demand	2258 kVA
Minimum Noontime Load (MNL)	719 kVA
Overloaded Service Transformers (Y/N)	Yes. • 25 kVA transformer overloaded by 12%
Stiffness Factor	Stiffness factor = Utility Fault Current / DER Aggregate Fault Current = 122 *Note - Nearly Insignificant: Very little concern unless DG is started/stopped frequently or has unusual fluctuations
Voltage Violations? (Y/N)	Yes. • 306 sections present an overvoltage of up to 129.68V
Feeder Reverse Power Flow Observations	DER AggrCap > MNL, this may be an indication of reverse power flow at feeder level.
Hosting Capacity	According to the Stochastic and Incremental HC analysis, this feeder cannot support additional DGs under the existing conditions

The preliminary results indicate that existing DER installations are causing several violations, predominantly related to service transformer overloads and overvoltage conditions during Minimum Daytime Load (MDL) periods. This trend is expected to persist, as DER interconnections continue at a rate of approximately 4,200 new systems per month across the system, adding approximately 32 MW of capacity monthly.

LUMA has collaborated with stakeholders to adopt Smart Inverter Settings consistent with IEEE Std. 1547-2018. These requirements supersede the technical standards previously referenced in Regulation 8915 and have been formally adopted through Technical Bulletin 2024-001. The new settings became effective on January 1, 2025, with mandatory compliance for all notified new DER interconnections required by April 1, 2025. As of said month, DERs compliant with Smart Inverter Settings constitute just over 4% of total installations.

Recognizing the operational importance of these settings, LUMA is actively reviewing and refining certain parameters based on stakeholder feedback and field experience. Revisions are being considered for abnormal voltage and frequency ride-through settings, enter service thresholds, and associated delay periods. These revisions will adhere to three guiding principles: (1) values must remain within the adjustable ranges specified in Technical Bulletin 2024-001; (2) settings must reflect Puerto Rico's observed system conditions; and (3) settings must not compromise established industry safety standards.

2.0 High Voltage Management

2.1 Statement of Position

LUMA is proactively addressing the challenges posed by high voltage conditions on the grid, recognizing the need for comprehensive infrastructure upgrades and enhanced data transparency. As part of its ongoing efforts to mitigate the impacts of DERs, LUMA recommends the retroactive application of smart inverter settings as a critical step within a broader, coordinated strategy to strengthen grid reliability and operational resilience.

2.2 Discussion and Rationale

Stakeholders expressed concerns regarding voltage fluctuations associated with DER proliferation. LUMA acknowledges these concerns and emphasizes that resolving voltage violations requires infrastructure upgrades at the distribution level and DER smart settings that manage voltage fluctuations at the point of interconnection, mostly voltage rise resulting from the injection of solar at the customer premise.

DER systems, if non-compliant, exacerbate existing voltage variability, complicating system stability efforts. Ensuring DER compliance through smart inverter settings (specifically the inverter Volt/VAR settings) enables the DER to control its point of injection voltage, thus preventing impacts to neighboring customers who may be affected by the voltage rise. LUMA can then isolate other causes of voltage variability and better plan corrective actions to maintain grid voltage. The need for voltage management upgrades aligns with the list of system improvements previously identified and disclosed by LUMA to the Energy Bureau during stabilization proceedings.

The voltage profile of each feeder is inherently unique, shaped by physical design, conductor specifications, length, loading conditions, and customer characteristics. No two feeders show identical voltage behavior.

LUMA currently uses a traditional suite of voltage regulation equipment to manage circuit voltage and reactive power demand, including:

- **On-Load Tap Changer (LTC)-equipped transformers** at substations, typically set around 1.05 p.u.
- **Voltage regulators** along feeders, providing ±10% voltage adjustments
- **Capacitor banks** offering downstream voltage support and power factor correction
- **Distribution transformer taps** near customer entrances
- **Additional measures** such as higher-capacity conductors and load balancing

While effective, under traditional centralized generation flows, this equipment was not originally designed for the bidirectional power flows introduced by DER systems. DERs inject energy at multiple points, increasing localized voltages at Points of Interconnection (POI) and, if concentrated enough, creating system-wide operational challenges and safety risks. In addition, current Puerto Rico laws that allow most DERs to interconnect automatically inhibit proactive voltage management planning because utilities cannot predict exactly where or when DERs will interconnect. While efforts are ongoing, full benefits of grid modernization, including AMI deployment, are expected to materialize over a three (3) to five (5) year horizon.

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LUMAs ability to monitor localized voltage conditions is further constrained by the lack of real-time metering at the service transformer or customer level. This limitation, and the anticipated benefits of AMI deployment, were also discussed in relation to threshold-setting and DER impact analysis in prior regulatory proceedings[3].

Until the AMI system is fully deployed, LUMA must rely largely on customer feedback to identify localized anomalies. During this time, DER equipment providers have real-time visibility into the performance of the system (voltage, current, frequency, and energy production) through their own monitoring platforms. While LUMA recognizes that integrating this data into utility operations would require coordination and effort, even limited or aggregated visibility could offer value in addressing certain operational challenges, particularly in the context of voltage management and system planning. To date, despite outreach efforts, no structured data-sharing arrangements have been established.

Technical Bulletin 2024-001 prescribes several measures to manage high-voltage conditions through Volt-Var and Volt-Watt functionalities, prioritizing Volt-Var as the primary tool. Without wide adoption of smart settings, the immediate system-wide impact will be limited.

Accordingly, LUMA recommends applying Smart Inverter Settings retroactively to all inverter-capable DER systems installed after 2018. Based on available technical information, equipment providers can likely apply these settings remotely (“over-the-air”).

[3] *Supra, at pp. 5–6.*

3.0 Data Collection and Visibility

3.1 Statement of Position

LUMA emphasizes that visibility into DER operations is essential for effective system monitoring, compliance verification, and the ongoing refinement of smart inverter settings. Accordingly, LUMA recommends that developers provide real-time access to operational data and supports the adoption of standardized documentation practices, such as the Common File Format (Common File) developed by the Electric Power Research Institute (EPRI), as a mandatory requirement for all DER projects.

3.2 Discussion and Rationale

LUMA emphasizes that an improvement in system visibility is essential for the effective implementation and validation of smart inverter settings. Without site-level metering or AMI, post-installation verification of inverter performance and compliance with technical requirements is not feasible.

A fundamental prerequisite for leveraging DERs as reliable and controllable system assets is the ability to monitor and manage their operation in real time. As previously outlined in Section 2.2, LUMA's existing infrastructure does not provide the necessary visibility at the transformer secondary level or at individual customer connection points. The current metering infrastructure lacks real-time measurement capabilities, requiring customer-initiated reports to identify and address localized system conditions like high voltage.

LUMA is actively implementing a system-wide AMI deployment, which will enable real-time visibility and communication for localized system monitoring; deployment is expected to be completed within approximately three (3) to five (5) years, which will allow for later implementation of additional initiatives. LUMA has emphasized that AMI will also enable periodic reassessment of DER study thresholds and enhance proactive voltage management[4].

Access to improved data transparency from developers during this time is critical to understanding DER behavior and system impacts. Also, having near real-time operational data will facilitate timely adjustment or refinement of smart inverter settings, ensuring that decisions are grounded on transparent, data-driven analyses. Most inverters installed after 2018 possess the capability to monitor parameters such as voltage, current, frequency, and energy production at high resolution. Equipment providers typically keep access to this information through their monitoring platforms.

Given these existing capabilities, LUMA believes that developers should provide ongoing access to DER operational data through their monitoring networks. This access would enable LUMA to validate system conditions, assess compliance with operational settings, and ensure the effectiveness of mitigation strategies.

In support of standardizing and streamlining the validation process, LUMA recognizes the value of adopting the Common File developed by the EPRI. The Common File provides a standardized method for documenting inverter settings and verifying their correct implementation across diverse equipment types. To maximize the effectiveness and reliability of the smart inverter implementation process, LUMA

[4] *Id. at p. 6.*

recommends that the use of the Common File be made mandatory for all developers. Furthermore, developers should be required to provide evidence of the applied settings upon request, enabling ongoing monitoring and validation of DER compliance with technical requirements.

4.0 Compensation for Curtailment

4.1 Statement of Position

Compensation is limited to actual net energy delivered to the grid, as established under Act 114-2007, Regulations 8915 and 8916, and standard interconnection agreements. The applicable legal, regulatory, and contractual framework does not create a right to compensation for non-exported energy and authorizes LUMA to limit energy exports when necessary to protect the electric power system.

4.2 Discussion and Rationale

Technical Bulletin 2024-001 introduces Volt-Var and Volt-Watt functionalities, which enable dynamic voltage regulation and, in certain cases, automatically reduce the amount of energy a DER can export to the grid. These functionalities were designed to safeguard system stability and reliability by mitigating voltage fluctuations that could adversely affect system operators, other grid users, and overall network integrity. Considering these export limitations, some stakeholders participating in the SIWG workshop argued that customers should be compensated for potential revenue losses resulting from reduced energy exports due to these functionalities. LUMA makes reference to the terms defined under the applicable regulatory framework and individual Net Energy Metering (NEM) agreements, which maintain that compensation is strictly limited to net measured energy exports. This framework does not create an obligation to compensate customers for energy not exported due to curtailment necessary for operational reliability, voltage control, or public safety.

Specifically, the Puerto Rico Net Metering Program Act, Act No. 114-2007, as amended (Act 114), which governs the interconnection and NEM framework for DER systems, establishes clear eligibility and operational requirements. Under Section 2(c) and (i) of Act 114, a customer-generator must conduct operations compatible with the electric utility's existing transmission and distribution facilities and must meet the interconnection and operational standards established by the relevant regulations. Furthermore, Section 5(c) of Act 114 specifies that a NEM customer is entitled to receive a credit per kilowatt-hour of energy supplied to the grid, based on the rate or compensation mechanism authorized by the Puerto Rico Energy Bureau.

In mandating the issuance of interconnection regulations, Act 114 further requires that such regulations must be consistent with the public policy objectives established under Section 9 of the Act, particularly ensuring the reliability and safety of the electric power system. [5]

Pursuant to Act 114, both Regulation 8915 (Regulation on Interconnection of Distributed Generators) and Regulation 8916 (Regulation to Interconnect Generators to the Electric Transmission and Sub-transmission Systems and Participate in the NEM Programs, adopted February 6, 2017) explicitly authorize curtailment when necessary to maintain system reliability, voltage stability, or operational safety. Regulation 8915, Section III, Article Q, and Regulation 8916, Section VI, Article D, expressly recognize LUMA's right to limit injections under these circumstances.

[5] See Puerto Rico Net Metering Act, Act No. 114-2007, as amended, § 10.

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Moreover, both regulations consistently define NEM credits based solely on actual energy exported to the grid. Regulation 8915, Section II, Articles N (definition of “Credit for Energy Exportation”) and AA (definition of “Net Exportation”), and Regulation 8916, Section II, Articles L and X, reinforce that only verifiable net exports are eligible for crediting purposes. Neither statute nor regulation contemplate compensation for energy that could have been exported but was curtailed to protect system integrity.

Consistent with these regulatory requirements, PREPA’s standard Agreement to Interconnect Generators further conditions interconnection on compliance with technical standards and grants the utility the right to require modifications, install protective devices, or disconnect customer systems, if necessary, to maintain grid stability. The agreement also explicitly states that compensation is based on actual net energy exported as measured by approved metering equipment.

Puerto Rico weather is highly variable with frequent instances of cloud-cover which leads to reductions in output of the solar PV system. LUMA’s position is that the inherent variability will cause much more reduction in annual energy output than potential reductions from advanced inverter functions. LUMA also expects that application of advanced inverter functions are not designed to limit export from the individual customer’s DER, and that any action that results in reduction of energy production or export is treated as a protective function of the inverter and system connected. For example, if grid voltage is high enough to cause an inverter with a Volt/Watt setting to reduce output, an emergent condition that leads to high voltage actively occurring; importantly, if Volt/Watt was not implemented, the inverter would be required to disconnect from the grid at that high voltage. Therefore, LUMA concludes that the Volt/Watt function has as much benefit to keeping the system online during a high voltage scenario (an inverter that should have already been offline), so the customer is already seeing benefit by staying connected for a longer period and potentially never totally disconnecting.

5.0 Closing Statement

Through active participation in the SIWG discussions, stakeholder workshops, and ongoing technical refinement efforts, LUMA continues to demonstrate its commitment to supporting the responsible integration of DERs while safeguarding the safety, reliability, and operational integrity of Puerto Rico's electric power system.

LUMA remains committed to collaborating with stakeholders and addressing evolving challenges on the grid. Current efforts are focused on refining smart inverter settings to reflect the island's unique system characteristics, advancing data transparency and validation through standardized formats, and supporting the infrastructure upgrades needed to manage voltage conditions associated with growing DER penetration.

LUMA may provide additional updates as work progresses and remains engaged in ongoing coordination with the Energy Bureau.