

**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 approval of the Customer Battery Energy Sharing+ (CBES+) Program as filed by LUMA May 8, 2025
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**SOLAR UNITED NEIGHBORS COMMENTS IN SUPPORT OF THE APPROVAL OF
“MOTION TO SUBMIT PROPOSAL FOR EXPANDED CUSTOMER BATTERY
SHARING PROGRAM” AS FILED BY LUMA ENERGY MAY 8, 2025**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW, Solar United Neighbors (“SUN”) appears in these proceedings by and through its undersigned staff representative and respectfully states the following:

1. On January 31, 2025, LUMA Energy Corp. and LUMA Energy ServCo, LLC (jointly referred to as “LUMA”) filed a permanent Customer Battery Energy Sharing (“CBES”) program, seeking approval from this Energy Bureau. On May 8, 2025, following the technical conference held on April 24, 2025, LUMA moved for approval of an Expanded CBES program, called CBES+ to meet resource adequacy needs starting this summer.
2. The CBES program, currently in a pilot phase, provides incentives to residential customers for sharing stored energy from their batteries during demand response (“DR”) events, helping LUMA to meet the peak energy demand needs of its customers. The pilot program operates through the assistance of third-party aggregators, who enroll customers, dispatch battery resources of participating customers during grid events, report performance, and compensate customers based on participation. In working through these aggregator companies, the program leverages the investment and innovation of the private sector to realize cost savings for all customers.

3. SUN is a national nonprofit organization formed in 2007. SUN works in all 50 states, Washington, D.C., and Puerto Rico, to advance the interests of solar customers and other supporters by advocating for policies and programs that grow the solar market and support a clean, resilient, and equitable energy system. SUN provides educational and consumer resources to assist customers considering investments in rooftop solar and other distributed energy resources, such as battery storage. SUN's advocacy is rooted in the premise that solar, battery storage, and other supporting distributed energy resource technologies will create thousands of good-paying local jobs, keep energy dollars local, strengthen communities, provide human health and environmental benefits, and help drive down the costs of electricity for all ratepayers.
4. SUN has approximately 60,000 supporters in Puerto Rico, including families and small business owners who have customer-sited solar energy and/or solar energy and battery storage.
5. SUN has been supportive of LUMA's pilot program. LUMA's CBES program is widely considered one of the most successful Distributed Power Plants (DPP, also known as a Virtual Power Plant or VPP) in the nation, with higher enrollment than most other pilot programs and with a successful program design relying on third-party aggregator companies to help create a positive customer experience and to achieve administrative and overhead cost savings for customers.
6. SUN therefore fully supports LUMA's intentions to expand the program through its motion for approval of CBES+. Quickly ramping up enrollment will help the program achieve its targets and goals to grow and scale the CBES program resource before summer 2025 and beyond to meet Puerto Rico's energy needs.
7. SUN also supports LUMA's proposal to transition and grow the program with minimal impact to existing customers, including through retention of program design elements such as the

existing \$1.25/kWh incentive. By not lowering incentives and keeping other elements intact, LUMA will help retain existing customers, minimizing customer loss which would detract from the goal of increasing enrollment in the program.

8. SUN joins the request of the Puerto Rico Solar Energy Industries Association DBA Solar and Energy Storage Association of Puerto Rico (“SESA”) for rapid approval of the CBES+ program proposal as filed by LUMA to allow it to be in place before the summer 2025 season. SUN also joins SESA’s request for the CBES+ program to be considered a permanent program available to meet resource adequacy needs now into the future. Notably, SUN supports SESA’s recommendation that customers remain enrolled in the program until they voluntarily unenroll. In SUN’s review of other DPP programs around the country, when utilities require customers to re-enroll when transitioning from a pilot to a permanent program or when changing a program’s key terms and conditions, this leads to a drop off in enrollment. A better approach is to keep customers enrolled so they are automatically transitioned to the new or expanded program.

9. SUN further joins the requests of SESA to modify the proposal to recognize (1) a DERMS platform is helpful but not a necessary prerequisite to deployment of CBES+ and therefore CBES+ should not be delayed from the acquisition and deployment of a DERMS platform; (2) the program should not have a formal “minimum” number of events; (3) the program should maintain customer flexibility in setting battery reserve levels; (4) the program should maintain customer ability to opt-out of events and unenroll in the program without penalty; and (5) the program should not have enrollment caps, allowing for maximum participation.

WHEREFORE, SUN fully supports the CBES+ program and we appreciate the Honorable Energy Bureau's prompt review and approval of the program.

Respectfully submitted this 19th day of May, 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 was notified to hrivera@jrsp.pr.gov; arivera@gmlex.net; mvalle@gmlex.net; agraitfe@agraitlawpr.com, info@sesapr.org, bfrench@veic.org, shanson@veic.org, jordgraham@tesla.com, forest@cleanenergy.org, customerservice@sunnova.com, pjcleanenergy@gmail.com, mrrios@arroyorioslaw.com, javrua@sespar.org, pjcleanenergy@gmail.com, and evand@sunrun.com.

Sincerely,

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