

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

NEPR

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IN RE:

INTERCONNECTION REGULATIONS

CASE NO. NEPR-MI-2019-0009

SUBJECT: LUMA's Notice of Intent to File Comments in Response to Comments Presented by Enphase and SESA and to Submit LUMA's Proposal regarding the Smart Inverter Settings Sheets

**LUMA'S NOTICE OF INTENT TO FILE COMMENTS IN RESPONSE TO
COMMENTS PRESENTED BY ENPHASE AND SESA AND TO SUBMIT LUMA'S
PROPOSAL REGARDING THE SMART INVERTER SETTINGS SHEETS**

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. Relevant Background/Procedural History

On November 15, 2024, LUMA submitted to the Puerto Rico Energy Bureau of the Public Service Regulatory Board ("Energy Bureau") a final version of LUMA's Technical Bulletin on Smart Inverter Settings Sheets with an effective date of January 1, 2025 ("January 2025 Smart Inverter Settings Sheets"), in compliance with a Resolution and Order from the Puerto Rico Energy Bureau issued on November 7, 2024 ("November 7th Order"), in which the Energy Bureau approved this document with the inclusion of a modification.¹ The January 2025 Smart Inverter Settings Sheets were established to ensure smart inverters meet standards for grid support and operational efficiency and improve the integration and functionality of distributed energy resources within

¹ 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* ("November 15th Motion").

Puerto Rico's electric distribution system.² These settings are part of a much-needed integrated approach to maintain grid safety and reliability.³

The January 2025 Smart Inverter Settings were the result of a process of revisions of an initial version published by LUMA in April 2024, resulting in a revised version submitted to the Energy Bureau on September 17, 2024, and which was modified prior to finalization as per November 7th Order.⁴ That process also involved a stakeholder technical conference/workshop held on June 18, 2024, and the filing of comments by stakeholders.⁵

As per the November 7th Order, a working group (named the “Smart Inverter Working Group” (“SIWG”)) was established to hold meetings geared at addressing issues relating to the implementation and possible modifications to the January 2025 Smart Inverter Settings Sheets.⁶

SIWG Meetings were held on November 21, 2024, February 11, 2025, and April 3, 2025, with the participation of LUMA and various stakeholders. Stakeholders submitted comments to the Energy Bureau regarding the subjects discussed in the SIWG Meetings.⁷

² See *id.*, p. 2.

³ See *id.*

⁴ See *id.*; *Motion to Submit Revised Technical Bulletin regarding Smart Inverter Settings Sheets Issued by LUMA* filed on September 13, 2024; and *Motion to Submit Revised Technical Bulletin regarding Smart Inverter Settings Sheets and Request to Substitute Exhibits 1 and 2 Submitted on September 13, 2024* filed on September 17, 2024.

⁵ See *id.* pp. 2-6; *Urgent Request Regarding LUMA’s Publication of a “Smart Inverter Settings Sheets-Technical Bulletin”/ NEPR-MI-2019-0009* filed on April 4, 2024; *Renewed Request Regarding LUMA’s Technical Bulletin* filed on June 17, 2024; *Request for Various Orders Regarding June 18th Conference and Technical Bulletin* filed on June 25, 2024; *Enphase Energy, Inc. Comments on Default Smart Inverter Settings* filed on July 15, 2024; *Comments of Sunrun Inc.* filed on July 15, 2024; *Comments of SESA Puerto Rico* filed on July 16, 2024; *Comments of Tesla, Inc.* filed on August 20, 2024; *Motion in Support of Revised Technical Bulletin on Smart Inverter Setting Sheets* filed on September 26, 2024; and *Tesla, Inc. Response to LUMA’s Motion to Submit Revised Technical Bulletin Regarding Smart Inverter Settings Sheets* filed on October 1, 2024.

⁶ See November 7th Order, pp. 6-7.

⁷ See *Enphase Energy, Inc. Comments to PREB Smart Inverter Working Group re: Customer Protections for System Curtailments under the Volt-Watt Smart Inverter Function* filed on December 11, 2024; *Initial Feedback from the Solar & Energy Storage Association of Puerto Rico (SESA)* filed on December 11, 2024; *Comentarios Suplementaris de la Oficina Independiente de Protección (OIPC) al Consumidor Sobre lo*

On April 25, 2025, LUMA submitted its comments on various topics discussed during the SIWG meetings (“LUMA’s April 25th Comments”).⁸ In response to these comments, Enphase Energy, Inc. (“Enphase”) and the Solar and Energy Storage Association of Puerto Rico (“SESA”) submitted comments on May 7, 2025 (“Enphase’s May 7th Comments”) and May 14, 2025 (“SESA’s May 14th Comments”), respectively, opposing some of LUMA’s positions and requested the Energy Bureau to revise the January 2025 Smart Inverter Settings Sheets in accordance with a proposal of modified settings presented by SESA.⁹

II. Notice and Request

While it values Enphase’s and SESA’s input and collaboration, LUMA disagrees with the conclusions set forth in Enphase’s May 7th Comments and SESA’s May 14th Comments regarding LUMA’s recommendations in LUMA’s April 25th Comments. Contrary to assertions made by Enphase and SESA, LUMA has actively collaborated with the Energy Bureau and stakeholders, participating in technical workshops and discussions to ensure the Smart Inverter Settings Sheets reflect the unique needs of the Island, address community concerns, and strengthen the safety of Puerto Rico’s electric grid. LUMA emphasizes that its recommendations are aimed at reducing

Discutido en el Primer Taller Sobre “Smart Inverters” filed on December 26, 2024; Input regarding real-world impact of new Smart Inverter Settings since going into effect January 1st, 2025, and Request for Urgent Modifications to required Smart Inverter Settings filed on February 10, 2025; and SESA Re-Filing of Smart Inverter Settings Recommendations filed on April 25, 2025.

⁸ See *Motion to Submit LUMA’s Comments on Subjects Discussed During Smart Inverter Working Group Meetings*.

⁹ See *Enphase Energy, Inc. Comments to PREB re: Smart Inverter Working Group Filings* filed on May 7, 2025 and *Comments of the Solar and Energy Storage Association of Puerto Rico (SESA) Regarding Urgent Need for Immediate Action on Smart Inverter Settings* filed on May 14, 2025.

high-voltage issues and potential risks to the electric system, in alignment with LUMA's obligation to maintain a safe and reliable operation of Puerto Rico's energy system.

LUMA would like to have an opportunity to provide to this honorable Energy Bureau LUMA's position on Enphase's May 7th Comments and SESA's May 14th Comments, as well as present LUMA's proposal regarding the January 2025 Smart Inverters Settings, for the Energy Bureau to have a complete record before making any determinations on these subjects.

LUMA is working on a response to Enphase's and SESA's comments and a proposal regarding the January 2025 Smart Inverter Settings Sheets which involves evaluation of data on system measurements and simulations based on industry best practices. LUMA anticipates completing this internal evaluation in the next three to four weeks. Therefore, LUMA respectfully requests that the Energy Bureau grant LUMA until June 20, 2025 to submit its response to Enphase's and SESA's comments and additional comments and proposals relating to the January 2024 Smart Inverter Settings.

LUMA emphasizes the importance of this Honorable Energy Bureau having LUMA's forthcoming response and for LUMA to have an opportunity to be heard before any action regarding the January 2025 Smart Inverter Settings is taken, given the significance of the Smart Inverter Settings Sheets for maintaining grid safety and reliability and LUMA's role as operator of the grid.

LUMA reaffirms its commitment to the safe, sustainable, and orderly growth of small-scale renewable energy production, for the benefit of all customers and Puerto Rico's energy future.

WHEREFORE, LUMA respectfully requests the Energy Bureau to (i) **take notice** of the aforementioned; and (ii) **grant** LUMA until June 20, 2025, to provide LUMA's position on

Enphase's and SESA's comments and LUMA's proposals regarding the January 2025 Smart Inverter Settings.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 24th 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 will be notified to hriviera@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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