

From: Javier Rua <JavRua@sesapr.org>  
Sent: Tuesday, May 27, 2025 4:59 PM  
To: Comentarios <comentarios@jrsp.pr.gov>; Sonia Seda <sseda@jrsp.pr.gov>  
Cc: PJ Wilson <pjcleanenergy@gmail.com>  
Subject: SESA Reply Re LUMA



May 27, 2025

VIA EMAIL: [comentarios@jrsp.pr.gov](mailto:comentarios@jrsp.pr.gov)

**RE: Urgent Request Regarding LUMA's "Notice of Intent to File Comments in Response to Comments by Enphase and SESA and to Submit LUMA's Proposal Regarding the Smart Inverter Settings" / Case No. NEPR-MI-2019-0009 (Interconnection Regulations)**

Dear Honorable Energy Bureau,

Comes now, the Puerto Rico Solar Energy Industries Association Corp., d/b/a/ Solar and Energy Storage Association of Puerto Rico (hereinafter, "SESA") the non-for-profit association that represents Puerto Rico's solar and energy storage industries. SESA advocates for solar and storage technologies at all scales as a central solution to the energy needs of Puerto Rico, promotes public policy that benefits the growth of these industries, brings awareness and understanding of these technologies to energy stakeholders, government policymakers and the public, and facilitates collectively beneficial collaboration.

LUMA, via its "*Notice of Intent to File Comments in Response to Comments by Enphase and SESA and to Submit LUMA's Proposal Regarding the Smart Inverter Settings*" filed on May 24, 2025 (Notice of Intent), is requesting permission from the Energy Bureau to wait until to 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". SESA opposes this request.

There is no PREB order establishing a procedure for LUMA to file any such proposal. Rather, PREB's order from November 7th, 2024, instead orders a collaborative process, stating: "The Energy Bureau ESTABLISHES a Smart Inverter Working Group process as described herein to address the implementation and possible modifications to the approved Smart Inverter Settings Profile."

Following the letter and spirit of the Energy Bureau's November 7<sup>th</sup>, 2024, order, SESA has endeavored to work reasonably and collaboratively in this matter toward a consensus based, joint stipulation proposal for modifications to the current Smart Inverter Settings. We recognize LUMA's past openness for a consensus-based approach, and it is SESA's sincere wish that the collaborative spirit previously portrayed is re-initiated soon, for the benefit of Puerto Rico.

However, LUMA's Notice of Intent of May 24<sup>th</sup> proposes to pull stakeholders further apart, not closer. If granted, LUMA's request would needlessly delay this process, opting for unnecessary regulatory filings instead of simply constructively talking with stakeholders to formulate a joint proposal for Energy Bureau consideration. Not only would a LUMA filing on June 20<sup>th</sup> force this process into the middle of hurricane season, it would also make it extremely onerous if not impossible for PREB to hear, evaluate and consider sensible and necessary stakeholder input before the upcoming June 30<sup>th</sup> deadline.

We appreciate the consideration of this Honorable Energy Bureau in this important matter, aiming to safeguard the interests of all stakeholders, as well as protecting its own prerogatives as energy regulator.

Sincerely,

*/signed*

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