

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

NEPR

Received:

May 30, 2025

12:30 PM

IN RE: REQUEST FOR CERTIFICATION
SUNNOVA ENERGY CORPORATION

CERTIFICATION NO.
CEPR-CT-2016-0002

SUBJECT: Demand Response
Aggregator Certification

**REQUEST TO RENEW DEMAND RESPONSE
AGGREGATOR CERTIFICATION**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW, Sunnova Energy Corporation ("Sunnova"), represented by the undersigned legal counsel, and respectfully submits the following:

1. On December 10, 2020, the Honorable Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") adopted the *Regulation for Demand Response*, Regulation 9246 ("Regulation 9246"). Among other things, Regulation 9246 required the Puerto Rico Electric Power Authority ("PREPA") or its successor, LUMA Energy, LLC and LUMA Energy ServCo, LLC (jointly, "LUMA"), to file a three-year Demand Response ("DR") Plan within six months of the effective date of the Regulation and to develop a demand response program to provide cost effective DR resources under its DR Plan.
2. On February 1, 2022, the Energy Bureau issued a Resolution and Order which, among other things, required that LUMA file the DR Transition Period Plan ("TPP").

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3. Thereafter, on June 21, 2022, LUMA submitted its Proposed TPP to the Honorable Energy Bureau. As part of the TPP, and in compliance with its Regulation 9246 mandate, LUMA launched an Emergency DR Program.
4. On March 12, 2024, Sunnova submitted its request for certification as a DR Aggregator under the Emergency DR Program of the TPP.
5. Sunnova is a certified Electric Power Service Company and DR Aggregator under the TPP. On March 27, 2024, the Energy Bureau issued a Resolution and Order ("March 27 R&O") confirming its certification pursuant to Act 57-2014, Regulation 9246, and the June 15, 2023 Resolution applicable to TPP participants. Pursuant to the March 27 R&O, Sunnova's DR Aggregator certification is set to expire on June 30, 2025, and could be renewed upon a timely request filed at least 30 days prior to expiration.
6. Although the March 27 R&O certifying Sunnova specifies a renewal deadline of "at least, thirty (30) days before" June 30, 2025, there is currently no Energy Bureau regulation or order expressly outlining the procedural requirements or documentation necessary for requesting renewal of a DR Aggregator certification.
7. Moreover, on April 3, 2025, the Energy Bureau issued a Resolution extending the effective period of the TPP through June 30, 2026. While that Resolution ostensibly extends the program under which DR Aggregators operate, it does not expressly extend the expiration date or renewal deadline applicable to existing DR Aggregator certifications, including Sunnova's. Likewise, no language in the March 27 R&O explicitly ties the renewal deadline to the duration of the TPP.

8. Given the foregoing, and to ensure continued compliance with applicable regulatory requirements, Sunnova respectfully submits this Request to renew its DR Aggregator Certification, pursuant to the March 27 R&O order.
9. Sunnova respectfully requests that the Energy Bureau consider all previously submitted information and documentation in support of its original certification and attaches an updated good standing certificate (**Attachment 1**).
10. Sunnova continues to provide DR services under the LUMA Emergency DR Program, in accordance with the special waiver provisions established by the Energy Bureau for participants in the TPP. Sunnova has not materially changed the scope, structure, or operation of its DR aggregation activities since its certification.

WHEREFORE, Sunnova Energy Corporation respectfully requests that the Puerto Rico Energy Bureau take notice of the present Request to Renew DR Aggregator Certification and grant the continuation of its DR Aggregator Certification.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 30th day of May, 2025.

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ATTACHMENT 1



DEPARTMENT OF STATE
GOVERNMENT OF PUERTO RICO

CERTIFICATE OF GOOD STANDING

I, **Narel W. Colón Torres**, Acting Secretary of State of the Government of Puerto Rico,

CERTIFY: That, pursuant to the provisions of Puerto Rico's General Law of Corporations, **SUNNOVA ENERGY CORPORATION**, register number **333038**, a **for profit foreign** corporation, organized under the laws of **Delaware** and duly authorized to do business in Puerto Rico since **December 10, 2013**, has complied with the filing of its Annual Reports.



IN WITNESS WHEREOF, the undersigned by virtue of the authority vested by law, hereby issues this certificate and affixes the Great Seal of the Government of Puerto Rico, in the City of San Juan, Puerto Rico, today, **May 30, 2025**.

Narel W. Colón

Narel W. Colón Torres
Acting Secretary of State

To validate this certificate go to: <https://estado.pr.gov/>

This certificate is valid for one (1) year from issue date (Regulation 8688, Art. 26). However, it is subject to faithful compliance with the provisions of Chapter XV and Chapter XXI of Act 164-2009, as applicable.

Certificate Validation Number: **806459-25237459**