

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

NEPR Received: Jul 21, 2025 11:14 PM

IN RE:

ENERGY EFFICIENCY AND DEMAND
RESPONSE TRANSITION PERIOD PLAN

CASE NO.: NEPR-MI-2022-0001

SUBJECT: Motion to Submit Monthly
Status Report on the CBES+ Program
for June, 2025, in Compliance with Resolution
and Order of May 29, 2025

**MOTION TO SUBMIT MONTHLY STATUS REPORT ON THE CBES+ PROGRAM
FOR JUNE 2025, IN COMPLIANCE WITH RESOLUTION AND ORDER OF MAY 29,
2025**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME now **LUMA Energy, LLC** (“ManagementCo”), and **LUMA Energy ServCo, LLC** (“ServCo”), (jointly referred to as “LUMA”), and respectfully state and request the following:

I. Introduction

As the Puerto Rico transmission and distribution system operator, LUMA is responsible for facilitating key customer initiatives such as Energy Efficiency (“EE”) and Demand Response (“DR”) Programs, which are required by law and mandated by the Puerto Rico Energy Bureau of the Public Service Regulatory Board (“Energy Bureau”). LUMA has been implementing a Transition Period Plan (“TPP”), containing various quick-start or pilot EE and DR programs, which sets the stage for the design and implementation of larger scale, more permanent programs. The TPP includes a pilot battery DR program (called “Customer Battery Energy Sharing” (“CBES”)) designed to leverage customer battery storage systems to increase the supply of energy available to the electric grid during peak demand periods, improve day-to-day service reliability and minimize the impact of load shedding.

In compliance with Energy Bureau directives, on January 31, 2025, LUMA filed with the Energy Bureau a proposed permanent version of the CBES program. By Resolution and Order of April 3, 2025, the Energy Bureau partially approved the permanent CBES proposal, while leaving certain aspects of this program pending further evaluation. During a Technical Conference held on April 24, 2025, LUMA discussed the proposed permanent CBES program and a CBES Emergency Expansion Program (referred to as “CBES+”) to increase available capacity under the CBES program during the period from May 31, 2025, through October 31, 2025, to address the projected generation shortfall during that period.

As directed by the Energy Bureau in a Resolution and Order of April 30, 2025, on May 8, 2025, LUMA filed with the Energy Bureau the formal proposal for the CBES+ and requested the Energy Bureau to approve this proposal, reiterating its request for approval of the totality of the permanent CBES.

By Resolution and Order of May 20, 2025, the Energy Bureau approved the remaining unapproved portions of the permanent CBES proposal and conditionally approved the CBES+ proposal as requested by LUMA subject to LUMA responding to a requirement for information (which LUMA did on May 27, 2025) and directed LUMA to submit monthly reports on the CBES+. Then, on May 29, 2025, the Energy Bureau approved the CBES+ and provided revised requirements for the monthly reports. In compliance with these orders, LUMA is submitting with this Motion its first monthly report on the CBES+.

II. Relevant Background and Procedural History

1. On October 23, 2024, the Energy Bureau issued a Resolution and Order (“October 23rd Resolution and Order”) in which it determined, among others, to extend the current TPP¹ (scheduled to expire on June 30, 2025) by an additional six months and ordered LUMA to file a revised TPP (“Revised TPP”) and a proposed form of a permanent CBES program to be implemented in June 2025. *See* October 23rd Resolution and Order, pp. 3-5. *See id.*

2. On January 31, 2025, LUMA filed with the Energy Bureau the proposed permanent CBES (“Permanent CBES Program”) and a Revised TPP.² *See Motion to Submit Permanent Customer Battery Energy Sharing Program Proposal in Compliance with Resolutions and Order of October 23, 2024 and December 5, 2024 and Motion to Submit Revised Energy Efficiency and Demand Response Transition Period Plan and Request for Modification of Deadlines Relating to Three-Year Energy Efficiency and Demand Response Plan* (“January 31st Motion”).

3. On April 3, 2025, the Energy Bureau issued a Resolution and Order (“April 3rd Resolution and Order”) partially approving, among others, the Permanent CBES Program proposal for three years with respect to “all aspects of program design that were unchanged from the pilot stage and dictate customer and aggregator interface to the program (such as kWh incentive level, aggregator enrollment model, and option for customers to opt-out of DR events)” and indicating that it would address the “necessary changes” to the CBES based on stakeholder comments and

¹ The original TPP, covering fiscal years 2023 and 2024, was submitted by LUMA on June 21, 2022 in Case No. NEPR-MI-2021-0006, *In Re: Demand Response Plan Review, Implementation and Monitoring*, and approved with modifications by the Energy Bureau by Resolution and Order issued on February 16, 2023, in the instant case. On December 20, 2023, LUMA submitted a revised version of this TPP extending its term until the end of fiscal year 2025, which revised TPP is currently under implementation.

² January 31, 2025 was the deadline to submit this document, as well as the Revised TPP, as provided in a Resolution and Order issued by the Energy Bureau on December 5, 2024, in attention to a request by LUMA in a *Motion for Extension of Deadlines and Modification of a Reporting Requirement in Resolution and Order of October 23, 2024*, filed on November 25, 2024.

the discussion at a Technical Conference scheduled for April 24, 2025. *See* April 3rd Resolution and Order, p. 2.

4. On April 24, 2025, the Energy Bureau held a Technical Conference (“April 24th Technical Conference”), in which LUMA presented, among others, the permanent CBES proposal and a proposal to expand the CBES program for summer 2025, referred to as the “CBES Emergency Expansion” or “CBES +”.

5. On April 30, 2025, the Energy Bureau issued a Resolution and Order (“April 30th Order”) ordering LUMA to submit, among others, its detailed proposal for the CBES+ and address certain topics or questions set forth therein. *See* April 30th Resolution and Order, p. 2.

6. In compliance with the April 30th Order, on May 8, 2025, LUMA submitted to the Energy Bureau its detailed proposal for the CBES+, containing the information required by the Energy Bureau (“CBES+ Proposal”). *See Motion to Submit Proposal for Expanded Customer Battery Energy Sharing Program and Revised Technical Conference Presentation In Compliance with Resolution and Order of April 30, 2025* (“May 8th Motion”) and its Exhibit 1. LUMA explained that the CBES+ proposed expanding the permanent CBES program beyond its enrollment threshold to reach an enrollment of about 60,000 customers, using auto-enrollment and traditional enrollment methods, to be able to dispatch up to 50 MW of capacity per four-hour event. *See id.*, p. 8. LUMA emphasized that the CBES+ necessitated the use of the Grid-Edge Distributed Energy Resource Management System (“DERMS”) platform for safe, reliable, and optimized dispatch of the CBES resources, minimizing manual errors and system risks. *See id.*

7. In the CBES+ Proposal, LUMA described three potential implementation scenarios for the CBES+, referred to as Scenarios A, B and C, and proposed the implementation of Scenario B which provides for the continuation of the CBES+ beyond October 31, 2025, maintaining the

full fleet of customers enrolled for CBES+ for the rest of Fiscal Year (“FY”) 2026 with limited discharge of all batteries to meet resource needs. *See id.*, p. 9. LUMA proposed a total budget for Scenario B of \$21.18 million, including the FY2026 budget for the Permanent CBES Program. *See id.* Accordingly, LUMA requested the Energy Bureau approve the CBES+ Proposal, and its Scenario B, and its associated budget, which LUMA explained includes the costs of the permanent CBES program. *See id.*, p. 9. In addition, LUMA requested that the Energy Bureau approve the submittal of the costs of the CBES+ for recovery as part of the quarterly Power Purchase Cost Adjustment (“PPCA”) process in Case No. NEPR-MI-2020-0001, *In re: Puerto Rico Electric Power Authority Permanent Rate* (“Permanent Rate Docket”) subject to later reconciliation based on actual expenditures. *See id.*, pp. 9-10. Furthermore, LUMA explained that the CBES+ builds upon the permanent CBES and requested the approval of the permanent CBES program in its totality and its associated budget, as well as the submittal of its costs for recovery as part of the quarterly PPCA process in the Permanent Rate Docket subject to later reconciliation based on actual expenditures. *See id.*, p. 10.

8. On May 20, 2025, the Energy Bureau issued a Resolution and Order (“May 20th Order”) conditionally approving the CBES+ proposal for Scenario B and the remaining unapproved portions of the permanent CBES proposal, “subject to the fulfillment” of responses to a Request of Information (“ROI”) included in Attachment A” of the May 20th Resolution and Order, on or before May 27, 2025. *See* May 20th Order, p. 2 and Attachment A.

9. In addition, the Energy Bureau ordered LUMA to submit monthly status reports, on or before the 20th of the month, on the CBES+ program for the summer season (June 2025 to October 2025), commencing in July 2025 (covering the month of June 2025, and including the following information): “incentives paid to date, total program costs to date, number of

participants, broken-out by auto-enrolled and opt-in, number of events called, average event duration, average event participation rate, average reserve level, total nameplate capacity, total nameplate energy, average event length, average total capacity per event, and average total energy per event.” *See id.* The Energy Bureau further directed that LUMA provide an individual event summary table like the table provided in Table 7: CBES Event-by-Event Summary on page 26 of Exhibit 1 of LUMA's [January 31st Motion]. On May 27, 2025, LUMA submitted responses to the requirements of information regarding the CBES+ proposal in compliance with the May 20th Order. *See Motion to Submit Responses to Requirements of Information Regarding CBES+ Proposal in Compliance with Resolution and Order of May 20, 2025, and Request for Confidential Treatment.*

10. On May 29, 2025, the Energy Bureau issued a Resolution and Order (“May 29th Order”) determining that the responses to the ROIs submitted by LUMA on May 27, 2025, were satisfactory “at this time” and that LUMA had “therefore met the requirements of the May 20th”. *See May 29th Order*, p. 2. The Energy Bureau then approved the CBES+ proposal for scenario B and the remaining unapproved portions of LUMA’s permanent CBES proposal, including the implementation of the DERMS platform. *Id.*, p. 3. The Energy Bureau also directed LUMA to: (a) not cease or curtail dispatch of the CBES batteries during grid emergency situations, nor artificially limit the size of the CBES program in a fashion that would result in avoidable outages for non-participating customers, due to lack of budgeted funds; and (b) not to allow the procurement and initialization process for a DERMS system to delay or defer the expansion and use of the CBES resource. *See id.* The Energy Bureau noted that “at a later date following the summer 2025 period, the Energy Bureau will evaluate plans for continued enrollment of auto-

enrolled customers past the end of fiscal year 2026 and address the minimum number of dispatch events and the appropriate process for un-enrollment for nonperformance.” *Id.*

11. The Energy Bureau also revised the reporting requirements established in the May 20 Order (which remained for the same period, dates and frequency), requiring that these include the following information:

- total program costs to date -broken out by incentive and administrative costs,
- number of participants enrolled -broken-out by auto-enrolled and opt-in,
- number of events called,
- average event duration,
- average event participation rate,
- average battery reserve level,
- total enrolled nameplate capacity per event,
- total enrolled nameplate energy,
- average event length,
- average total capacity per event, and
- average total energy per event.

12. Furthermore, the Energy Bureau directed LUMA to : (i) notify the Energy Bureau in the monthly report and include supporting assumptions if LUMA expected to exceed its planned budget of \$21M; and (ii) provide an individual event summary table like the table provided in Table 7: CBES Event-by-Event Summary on page 26 of Exhibit 1 of LUMA's January 31 Motion, including the reserve level at the time of dispatch, the duration and capacity of any load shed event on the same day, and whether the CBES resource avoided the need for a load shed event. *See id.*

III. Submittal of First Monthly Report

13. In compliance with the May 29th Order, LUMA submits herein its first monthly report on the CBES+ Program, covering the month of June 2025. *See Exhibit 1.*

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned; and **accept** *Exhibit 1* herein in compliance with the Energy Bureau’s Resolution and Order of May 29, 2025.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 21st day of July 2025.

We hereby certify that we filed this Motion using the electronic filing system of this Energy Bureau and that we will send an electronic copy of this Motion the Independent Office for Consumer Protection at hrivera@jrsp.pr.gov; PREPA at arivera@gmlex.net; and mvalle@gmlex.net; and agraitfe@agraitlawpr.com; info@sesapr.org; bfrench@veic.org; evand@sunrun.com; jordgraham@tesla.com; forest@cleanenergy.org; customerservice@sunnova.com; javrua@sesapr.org; pjcleanenergy@gmail.com; cfl@mcpr.com; mqs@mevpr.com; and mrios@arroyorioslaw.com.



DLA Piper (Puerto Rico) LLC
500 Calle de la Tanca, Suite 401
San Juan, PR 00901-1969
Tel. 787-945-9147
Fax 939-697-6147

/s/ Laura T. Rozas
Laura T. Rozas
RUA No. 10,398
laura.rozas@us.dlapiper.com

Exhibit 1
Monthly Status Report CBES+ (June 2025)

Monthly Status Report CBES+

Reporting Period:
June 2025

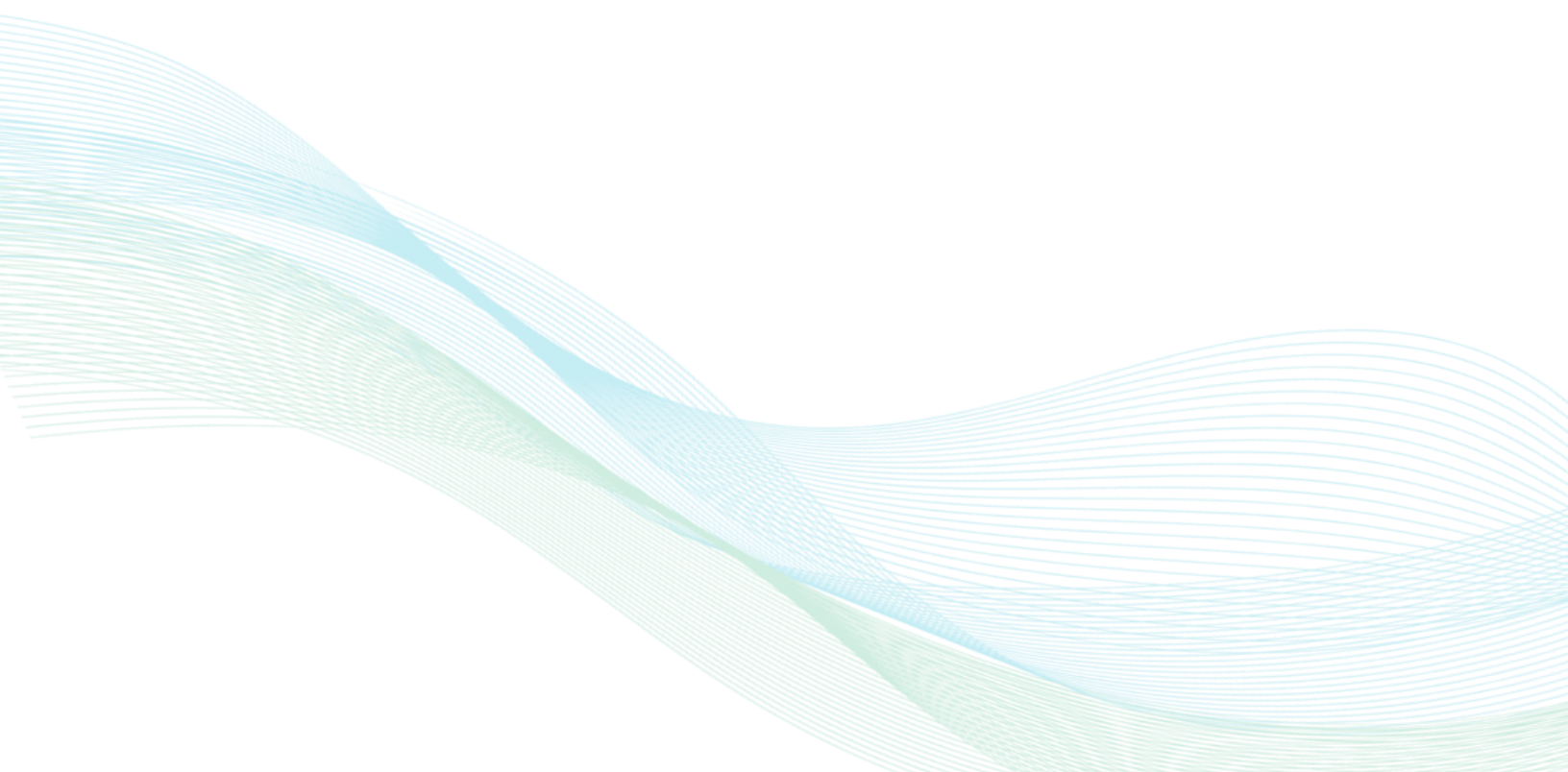
NEPR-MI-2022-0001

July 21, 2025



Contents

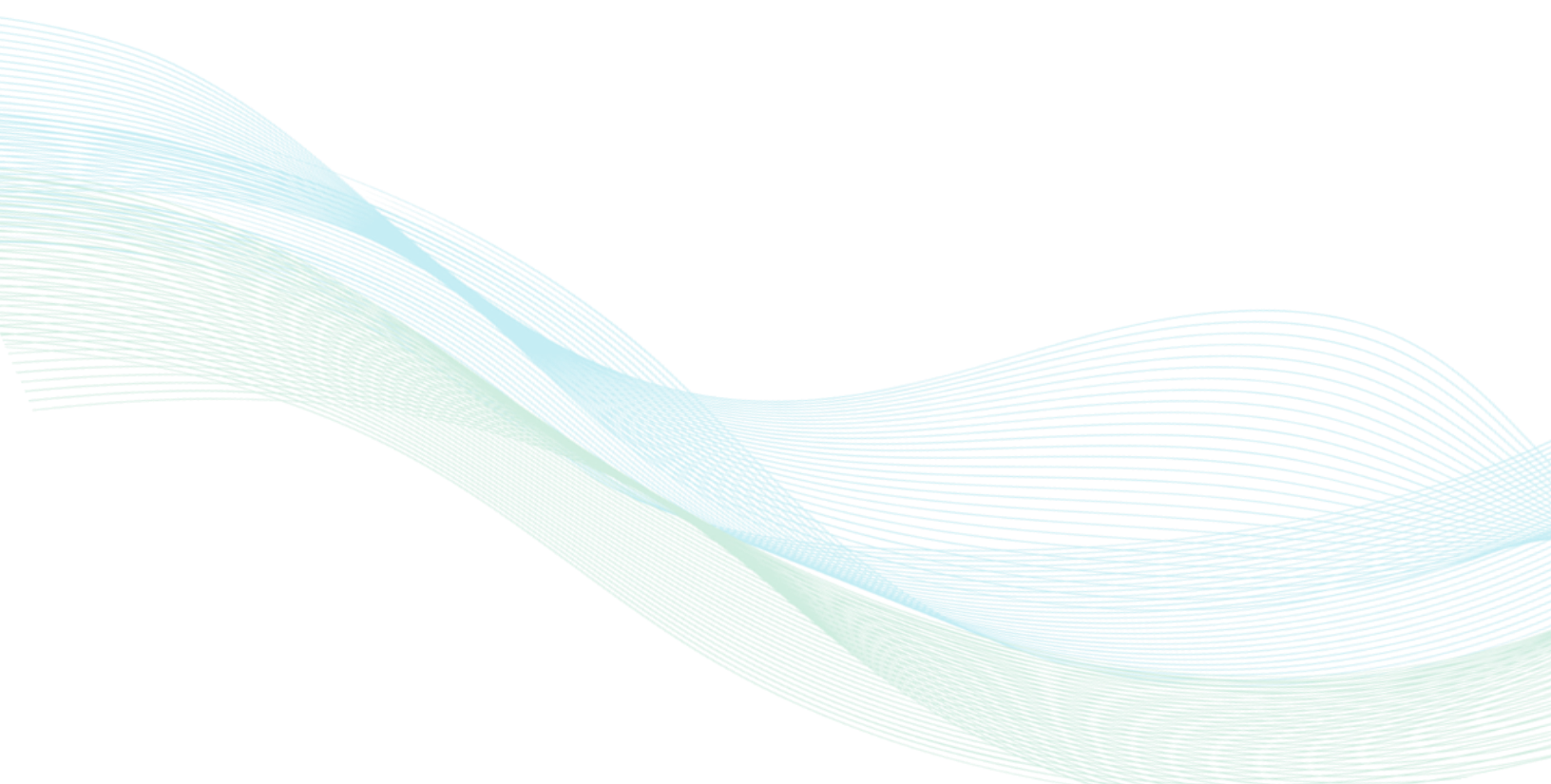
Tables & Figures	3
1.0 Introduction	4
2.0 CBES+ Program for the Summer 2025 Season (June 1, 2025 – October 31, 2025)...	4



Monthly Status Report CBES+

Tables & Figures

Table 1: CBES+ Event-by-Event Summary 5



Monthly Status Report CBES+

1.0 Introduction

In accordance with the Resolution and Order (R&O) dated May 29, 2025 ("May 29th Resolution"), issued by the Puerto Rico Energy Bureau (PREB) in Case No.: NEPR-MI-2022-0001, In Re: Evaluation of Demand Response and Energy Efficiency (TPP), LUMA is required to provide monthly status reports on the CBES+ program for the summer 2025 season (June 1, 2025 - October 31, 2025). This report, in compliance with the May 29th Resolution, outlines the key activities and progress achieved by LUMA regarding the CBES+ program.

2.0 CBES+ Program for the Summer 2025 Season (June 1, 2025 – October 31, 2025)

The initial implementation of the CBES+ program continues to demonstrate strong performance and growing impact. During the month of June, the focus of the program was to validate the list of auto-enrollment participants. LUMA expects that scaling CBES+ enrollment will further bolster grid stability and help offset projected generation shortfalls through the remainder of the summer peak season. Unenrollment and opt-out rates remain low, underscoring broad customer acceptance and satisfaction.

During the reporting period of June, the CBES+ program was not dispatched during this period. Information regarding CBES+ dispatch activity will be included in the upcoming August report.

Administrative costs associated with the CBES program are not segmented between CBES and CBES+; the program operates under a unified budget structure without distinct cost allocations for each component.

Total Program Costs to Date (Broken out by Incentive and Administrative Costs).

No incentive payments were issued to aggregators. CBES+ has not incurred in any programs costs.

Number of Participants Enrolled (Broken-out by auto-enrolled and opt-in).

The number of auto-enrolled participants as of June 30th was zero since the program was launched on July 1st.

Number of Events Called

There were no CBES+ events called for the month of June since the program was launched on July 1st, 2025.

Average Event Duration

CBES+ participants, representing auto-enrolled customers, did not take part in any events during the month of June 2025.

Average Event Participation Rate

CBES+ participants, representing auto-enrolled customers, did not take part in any events during the month of June 2025.

Monthly Status Report CBES+

Average Battery Reserve Level

CBES+ participants, representing auto-enrolled customers, did not take part in any events during the month of June 2025.

Total Enrolled Nameplate Capacity

CBES+ participants, representing auto-enrolled customers, did not take part in any events during the month of June 2025.

Total Enrolled Nameplate Energy

CBES+ participants, representing auto-enrolled customers, did not take part in any events during the month of June 2025.

Average Event Length

CBES+ participants, representing auto-enrolled customers, did not take part in any events during the month of June 2025.

Average Total Capacity Per Event

CBES+ participants, representing auto-enrolled customers, did not take part in any events during the month of June 2025.

Average Total Energy Per Event

CBES+ participants, representing auto-enrolled customers, did not take part in any events during the month of June 2025.

CBES+ Event-by-Event Summary

There were no CBES+ events called for the month of June since the program was launched on July 1st.

Table 1: CBES+ Event-by-Event Summary

Event Information			Participants		Event Statistics				
Date	Duration (Hours)	Start Time (AST)	Participating Customers	# of Participating Aggregators	Total Battery Energy Dispatched (KWh/Event)	Average Energy Per Participant (KWh/Event)	Total Battery Power Dispatched (KW)	Average Power Per Participant (KW)	Total Event Cost
No Events	-	-	-	-	-	-	-	-	-