

**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: Request for Approval of LUMA's
Revised Smart Inverter Settings Sheets**

**MOTION TO REQUEST APPROVAL OF LUMA'S REVISED 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. Introduction

1. LUMA is submitting this Motion to respectfully request the Puerto Rico Energy Bureau of the Public Service Regulatory Board (“Energy Bureau”) to approve without delay the proposed revisions submitted by LUMA on June 20, 2025¹ to the current Smart Inverter Settings Sheets (“January 2025 Settings”) so that these revisions (“Revised Settings”) can enter into effect as soon as possible.

2. LUMA and industry stakeholders have engaged in a lengthy and robust process regarding the January 2025 Settings. Since November 2024, three comprehensive Smart Inverter Working Group (“SIWG”) meetings have been held to discuss the January 2025 Settings, during which each of the topics identified by the Energy Bureau were discussed, and various stakeholders participated. These were followed by three comment periods where at least seven sets of comments

¹ See *Motion to Submit LUMA's Revised Smart Inverter Sheets and Responses to Stakeholder Comments*, filed on June 20, 2025 (“June 20th Motion”).

were filed, as well as subsequent additional filings from stakeholders, all of which provided plentiful opportunities to discuss issues and provide input.

3. Following this process, and based on the feedback provided throughout, LUMA prepared the proposed Revised Settings. In doing so, LUMA considered the input obtained from stakeholders during the SIWG meetings and other separate discussions, as well as system-level data, simulation results, operational experience, alignment with industry standards and best practices, while ensuring that all values are within the values set forth in the standards required by Regulation 8915²- that is, the IEEE Std. 1547-2018 standard.³ LUMA also endeavored to appropriately balance accommodating the capabilities of commercially available inverter technologies and maintaining the safety, reliability and operational integrity of the transmission and distribution system.⁴

4. In accordance with the information provided by LUMA in this proceeding, the growth of distributed energy resource (“DER”) systems in Puerto Rico is occurring at an exponential rate, with a 16% increase to over 165,000 systems in just six months between November 2024 and May 2025.⁵ LUMA respectfully submits that this rapid proliferation is causing widespread voltage violations across the distribution system. LUMA’s simulation of actual feeders demonstrates the severity of the issue; in one high penetration area, 58% (550 out of 955) of the circuit sections experienced some type of voltage violation without the proposed settings enabled.⁶ Conversely, these same simulations prove that activating the revised Volt/Var and Volt/Watt functions reduces that number to just around 10%, or 100 out of 955 sections.⁷

² The Puerto Rico Electric Power Authority’s Regulation to Interconnect Generators with the Distribution System of the Electric Power Authority and Participate in the Net Metering Programs, January 2017.

³ See June 20th Motion, pp. 2 and 5.

⁴ See *id.*, p. 5.

⁵ See June 20th Motion, Exhibit 3, p.3.

⁶ See *id.*, Exhibit 3, p.13.

⁷ See *id.*

Given the above, LUMA respectfully submits that adopting the Revised Settings will help protect and maintain the stability of Puerto Rico's electric grid, potentially avoiding costly feeder and substation upgrades that would otherwise be required to manage widespread voltage problems.⁸ Volt/Watt is important to conserve the operability of the system and provide a cost-effective alternative to large scale infrastructure investments.⁹

II. Relevant Procedural Background

5. On January 1, 2025, the January 2025 Settings developed by LUMA¹⁰ took effect, as approved by the Energy Bureau's Resolution and Order of November 7, 2024 ("November 7th Order"). These settings are designed to enhance grid support, operational efficiency, and the integration of distributed energy resource ("DER") systems while maintaining grid safety and reliability.¹¹

6. The January 2025 Settings originated from an initial version published by LUMA in April 2024. The January 2025 Settings were discussed in a stakeholder technical conference/workshop on June 18, 2024, followed by the submission of comments by

⁸ See, e.g., June 20th Motion, Exhibit 1, p. 4 and Exhibit 3, p. 15.

⁹ See, e.g., *id.*

¹⁰ 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*, filed on November 15, 2024 ("November 15th Motion").

¹¹ See *id.*, p. 2.

stakeholders.¹² Subsequently, LUMA submitted a revised version to the Energy Bureau on September 17, 2024, which was then modified and finalized as per the November 7th Order.¹³

7. Following the approval of the January 2025 Settings, the Energy Bureau commenced a process to address implementation issues and consider further modifications. This process was conducted through meetings of the SIWG and associated public comment periods.¹⁴ The SIWG meetings were held on November 21, 2024, February 11, 2025, and April 3, 2025, with the participation of LUMA, various stakeholders, and Energy Bureau consultants, including the Electric Power Research Institute. Following each meeting, some SIWG stakeholders submitted comments to the Energy Bureau regarding the subjects discussed in the meeting.¹⁵ Additional comments were submitted by LUMA and stakeholders after this process.¹⁶ Throughout this

¹² See November 15th Motion, pp. 2-6. See also *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.

¹³ See November 15th Motion. See also *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.

¹⁴ See November 7th Order, pp. 6-7; Resolutions issued by the Energy Bureau on January 13, 2025, and March 10, 2025.

¹⁵ 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 Suplementarios de la Oficina Independiente de Protección (OIPC) al Consumidor Sobre lo 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.

¹⁶ See *Motion to Submit LUMA's Comments on Subjects Discussed During Smart Inverter Working Group Meetings* filed on April 25, 2025; *Enphase Energy, Inc. Comments to PREB re: Smart Inverter Working Group Filings* filed on May 7, 2025; *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; and *Enphase Energy, Inc. Comments to PREB re: Smart Inverter Working Group Filings* filed on May 7, 2025; *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; *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*, filed on May 24, 2025; and *SESA's Urgent Request Regarding LUMA's "Notice of Intent to File Comments in Response to Comments by Enphase and SESA to Submit LUMA's Proposal Regarding the Smart Inverter Settings"* dated May 27, 2025.

process, LUMA engaged in direct discussions with stakeholders on at least five separate occasions¹⁷, ensuring that ample dialogue and input informed the final version of the proposed Revised Settings.

8. Following the conclusion of this lengthy process, on June 20, 2025, LUMA submitted to the Energy Bureau the proposed Revised Settings, as well as responses to comments from stakeholders that participated in the meetings of the SIWG.¹⁸ LUMA proposed that the Revised Settings become effective as soon as possible.¹⁹ LUMA also submitted a document explaining LUMA's revisions to the January 2025 Settings.^{20 21}

9. No further action has been taken by the Energy Bureau regarding the January 2025 Settings to this date.

III. Request

10. Given the foregoing history, LUMA respectfully submits that the time is ripe to proceed with the finalization of the Revised Settings and respectfully requests this Honorable Energy Bureau to issue a determination approving them, without further delay, to become effective as soon as possible, but in any case, without unreasonable delay. Unnecessarily further extending this process undermines efforts to protect the safety and reliability of the grid, which is a pressing concern given extensive DER penetration.²²

WHEREFORE, LUMA respectfully requests the Energy Bureau to (i) **take notice** of the aforementioned; (ii) **take into consideration** LUMA's comments and proposed revised settings

¹⁷ See June 20th Motion, Exhibit 1, p.5.

¹⁸

See June 20th Motion, Exhibits 1 and 2.

¹⁹ *Id.*, p. 5.

²⁰ See *id.*, Exhibit 3.

²¹ In response, on June 23, 2025, SESA filed an *Urgent Motion Requesting Technical Workshop Overseen by Honorable Energy Bureau*.

²² See *id.*, Exhibit 1, p. 5.

submitted in this proceeding on April 25, 2025 and June 20, 2025 in issuing any determination on the subject matters addressed in the SIWG meetings; and (iii) **approve**, without delay, the proposed Revised Settings submitted by LUMA on June 20, 2025, to be effective as soon as possible.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 20th day of August 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 hrivera@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.



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 Núm. 10,398
laura.rozas@us.dlapiper.com