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

IN RE:	**CASE NO.:** NEPR-MI-2022-0001
ENERGY EFFICIENCY AND DEMAND RESPONSE TRANSITION PERIOD PLAN	**SUBJECT:** Motion to Submit Monthly Status Report on the CBES+ Program for July 2025, in Compliance with Resolution and Order of May 29, 2025

MOTION TO SUBMIT MONTHLY STATUS REPORT ON THE CBES+ PROGRAM FOR JULY 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 the implementation of Puerto Rico's public energy policy, including key customer initiatives such as Energy Efficiency ("EE") and Demand Response ("DR") Programs, which are required by law and mandated by the Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau"). Accordingly, since 2023, LUMA has been implementing a Transition Period Plan ("TPP"), containing various quick-start or pilot EE and DR programs, with the purpose of setting the stage for the design and implementation of larger scale, more permanent programs.

After successfully implementing a pilot battery DR program, called "Customer Battery Energy Sharing" ("CBES"), LUMA developed a permanent version of this program referred to as the Permanent CBES which was approved by the Energy Bureau and is currently being implemented. The Permanent CBES is 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. Relatedly, LUMA also developed and is implementing, as approved by the Energy Bureau, a CBES Emergency Expansion Program (referred to as "CBES+") that increases 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 per Energy Bureau directives, with this Motion LUMA is submitting, as *Exhibit 1*, a monthly report on the CBES+, which also covers the Permanent CBES, covering the month of July 2025.

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 among others, it ordered LUMA to file a proposed form of a permanent CBES program to be implemented in June 2025.[1]

2. On January 31, 2025, LUMA filed with the Energy Bureau the proposed permanent CBES ("Permanent CBES Program").[2]

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

[1] *See* October 23rd Resolution and Order, pp. 3-5. *See id*.

[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").

that it would address the "necessary changes" to the CBES based on stakeholder comments and 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, 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.[3]

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").[4] 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

[3] *See* April 30th Resolution and Order, p. 2.
[4] *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.

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*. 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.

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.

10. On May 27, 2025, LUMA submitted responses to the ROI regarding the CBES+ proposal in compliance with the May 20th Order.[5]

11. On May 29, 2025, the Energy Bureau issued a Resolution and Order ("May 29th Order") determining that the responses to the ROI submitted by LUMA on May 27, 2025, were satisfactory "at this time" and that LUMA had "therefore met the requirements of the May 20th Order".[6] 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.[7] 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.[8] 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."[9]

12. The Energy Bureau also revised the reporting requirements established in the May 20th Order (which remained for the same period, dates and frequency), requiring that these include the following information[10]:

- total program costs to date -broken out by incentive and administrative costs,
- number of participants enrolled -broken-out by auto-enrolled and opt-in,

[5] *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*.
[6] *See* May 29th Order, p. 2.
[7] *Id*., p. 3.
[8] *See id*.
[9] *Id*.
[10] *Id*.

- 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.

13. Finally, 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.[11]

III. Submittal of Monthly Report

14. In compliance with the May 29th Order, LUMA submits herein its monthly report on the CBES+ Program, covering the month of July 2025, *see Exhibit 1*, and including information on the Month of June also. Since the CBES+ is implemented together with the Permanent CBES, the attached report informs on both programs.

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 20th day of August 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

[11] *See id*.

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Exhibit 1

Monthly Status Report
CBES+

Reporting Period:
July 2025

NEPR-MI-2022-0001

August 20, 2025

Contents

Tables & Figures

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 CBES+ program has quickly demonstrated its value as a critical component in strengthening grid stability and supporting peak demand management during the summer season. The program has contributed in supporting mitigating generation shortfalls by enabling the dispatch of distributed battery resources from both auto-enrolled and opt-in customers.

During the reporting months of June and July, CBES+ was actively dispatched in multiple events, reducing the load to the grid during load stressing periods. These contributions not only supported system reliability but also showcased the program's flexibility in managing diverse participant resources through coordinated sub-group dispatching strategies. Furthermore, we have verified an additional 14,000 potential participants, who will be incorporated into the CBES program in the forthcoming weeks. LUMA can confirm that the inclusion of additional participants will not result in exceeding the allocated budget of $21 million. LUMA will continue to monitor the budget closely and will notify the Energy Bureau as we approach the full utilization of the budget.

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

For June, program costs totaled $557,863.60, including $408,083.38 in incentives and $23,172.59 in administrative costs. The total costs for July are $784,490.93, including $741,940.00 in incentives and $42,551.00 in administrative costs.

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

As of June 30, 2025, there were 12,447 enrolled opt-in CBES customers. By July 31, 2025, there were an additional 717 opt-in customers. Bringing the total of opt-in customers to 13,164. The number of auto-enrolled customers as of the end of the reporting period is 54,140. The total number of customers enrolled in the CBES+ program is 67,304.

Number of Events Called

During June 2025, six CBES+ events were called, and during July 2025, 12 events were called.

Monthly Status Report CBES+

Table 1: Number of Events Called

Month	Events Called
June	6
July	12

Average Event Duration

The average event duration in both June and July was 4 hours.

Average Event Participation Rate

The average participation rate was 86% in June and 69% in July.

Average Battery Reserve Level

The average battery reserve level was 59% in June and 72% in July, based on aggregator self-reported data.

Total Enrolled Nameplate Capacity

In June, total enrolled nameplate capacity was 64.5 MW, increasing to 402.4 MW in July.

Total Enrolled Nameplate Energy

In June, total enrolled nameplate energy was 166 MWh, increasing to 1 GWh in July.

Average Event Length

The average event length in June was 4 hours, while in July the average was 4.75 hours. The extended duration in July reflects the dispatch of battery sub-groups, a design implemented to ensure the safe and reliable ramping up and ramping down of energy in accordance with the recommendations of our System Operations team. Each sub-group is limited to no more than 20 MW and is dispatched in intervals no shorter than 15 minutes. As a result, while the overall duration of the event remains 4 hours for all participating batteries, the event length extends to 4.75 hours when accounting for staggered start times.

Average Total Capacity Per Event

The average total capacity per event was 14.2 MW in June and 40.5 MW in July.

Average Total Energy Per Event

The average total energy per event was 54.4 MWh in June and 190.3 MWh in July.

CBES+ Event-by Event Summary

See Table 2 for June events & Table 3 for July events.

Monthly Status Report CBES+

Table 2: CBES+ June 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
17-Jun	4	18:30	9,900	7	46,235.87	4.7	15,286.12	1.5	$ 57,794.84
18-Jun	4	18:30	10,695	7	61,211.11	5.7	15,302.78	1.4	$ 76,513.89
24-Jun	4	18:30	10,530	6	52,882.45	5.0	13,220.62	1.3	$ 66,103.06
25-Jun	4	18:30	10,509	7	55,842.38	5.3	13,960.60	1.3	$ 69,802.98
26-Jun	4	18:30	10,552	7	55,968.05	5.3	13,992.02	1.3	$ 69,960.06
27-Jun	4	18:30	10,553	7	54,326.84	5.1	13,581.71	1.3	$ 67,908.55

Table 3: CBES+ July 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
7-Jul	4	18:30	45,471	7	206,310.67	4.5	43,935.03	1.0	$257,888.34
8-Jul	4	18:30	45,441	6	205,356.58	4.5	43,718.39	1.0	$256,695.73
10-Jul	4	18:30	44,657	7	195,334.09	4.4	41,623.06	0.9	$244,167.62
11-Jul	4	18:30	44,617	7	191,575.76	4.3	40,834.41	0.9	$239,469.71
12-Jul	4	18:30	44,498	6	188,297.21	4.2	40,069.04	0.9	$235,371.51
13-Jul	4	18:30	43,789	6	187,166.84	4.3	39,822.37	0.9	$233,958.55
14-Jul	4	18:30	53,130	7	190,083.78	3.6	40,504.87	0.8	$237,604.72
15-Jul	4	18:30	53,088	6	196,189.96	3.7	41,792.96	0.8	$245,237.45
16-Jul	4	18:30	52,827	6	191,027.32	3.6	40,698.56	0.8	$238,784.15
17-Jul	4	18:30	43,793	7	186,596.32	4.3	39,773.24	0.9	$233,245.40
18-Jul	4	18:30	43,953	7	187,718.70	4.3	40,014.87	0.9	$234,648.37
29-Jul	4	18:30	43,899	4	157,860.54	3.6	33,575.28	0.8	$197,325.67