

Request to Reschedule Community Solar Workshop

Honorable Commissioners
Puerto Rico Energy Bureau

NEPR

Received:

Aug 21, 2025

2:19 PM

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On behalf of the Solar and Energy Storage Association of Puerto Rico (SESA), write today regarding the important Community Solar proceeding, Case No. NEPR-MI-2025-0003.

We recognize and appreciate the Bureau's leadership in commencing this important docket through its July 22 Resolution and Order, which envisioned a Community Solar Pilot program of 25 MW, with individual projects of up to 5 MW in size. We also acknowledge the August 14 Resolution staying the Stakeholder Meeting originally scheduled for August 18, 2025.

Given recent federal developments, SESA respectfully urges the Bureau to move expeditiously in rescheduling this workshop. The OBBBA signed on July 5, 2025, combined with Treasury's administrative order issued last Friday¹, resulted in a critical limitation: **photovoltaic systems larger than 1.5 MW must begin construction no later than July 5, 2026 in order to qualify for the 30% Investment Tax Credit (ITC)**. After that date, the ITC disappears entirely for projects above 1.5 MW. While smaller systems may utilize safe harbor provisions to extend ITC eligibility, Community Solar projects are typically developed at around 5 MW—precisely the scale contemplated by the Bureau's July 22 Resolution.

This means that Puerto Rico has, at best, a narrow window for stakeholders and developers to align on program design, secure financing, and commence construction by July 5th of 2026. Timely action by the Bureau is therefore indispensable to ensuring that the Community Solar framework can deliver the intended benefits to Puerto Rican families—expanding access to renewable energy, lowering bills, and strengthening resilience—while leveraging federal incentives before they expire.

Accordingly, SESA respectfully requests that the Bureau promptly reschedule the Community Solar Stakeholder Workshop and establish a revised comment schedule to maintain momentum in this docket.

We stand ready to collaborate with the Bureau, the Energy Public Policy Program, the Independent Consumer Protection Office, LUMA, municipalities, and all stakeholders to advance this important initiative for Puerto Rico.

Respectfully submitted,

PJ Wilson
Executive Director
Solar and Energy Storage Association of Puerto Rico (SESA)

¹ <https://www.irs.gov/pub/irs-drop/n-25-42.pdf>