

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

NEPR

Received:

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IN RE: REQUEST FOR CERTIFICATION
OF SUNE XVI LESSOR, LLC

CASE NO.: NEPR-CT-2024-0006

SUBJECT: Filing of Operational Report and
Evidence of Filing Fee. Confidentiality
Treatment Request Granted

**MOTION IN COMPLIANCE WITH
AUGUST 12 RESOLUTION AND ORDER**

TO THE HONORABLE ENERGY BUREAU:

COMES NOW, SunE XVI Lessor, LLC ("SunE XVI"), represented by the undersigned legal counsel, and respectfully submits the following:

1. On August 12, 2025, the Honorable Energy Bureau (the "Bureau") issued a Resolution and Order (the "August 12 R&O") requiring SunE XVI to submit the credentials of the entity contracted to operate its systems, as required under Section 2.02 (A)(1)(d) of Regulation 8701.
2. Sun XVI complies with the August 12 R&O and respectfully submits the requested credentials for CAMS Solar Services LLC (formerly Belectric US LLC) (**Attachment 1**). SunE XVI also provides the following description of the services, system, and equipment operated by CAMS: operations and maintenance services include outage response, preventive maintenance, corrective maintenance, vegetation management, and module-washing management; the system is PR-12-0001—Janssen (Gurabo), also known as Janssen Solar Ortho, as referenced in CAMS's statement, with a capacity of 2,000.0 kW (AC) and 2,661.1 kW (DC); and the equipment consists of four SMA Sunny Central 500CP-US inverters and 8,064 Silvantis F330BYC solar modules.

3. SunE XVI requests that confidential treatment be afforded to the documents attached hereto.

Section 6.15 of Act No. 57 of May 17, 2014, as amended, 22 L.P.R.A. § 1054n, provides:

If any person who is required to submit information to the Energy [Bureau] believes that the information to be submitted has any confidentiality privilege, such person may request the [Bureau] to treat such information as such, subject to the following:

(a) If the Energy [Bureau], after the appropriate evaluation, believes such information should be protected, it shall grant such protection in a manner that least affects the public interest, transparency, and the rights of the parties involved in the administrative procedure in which the allegedly confidential document is submitted.

(b) To such purposes, the Energy [Bureau] shall provide access to the document or the privileged portion of the document only to the lawyers and external consultants involved in the administrative process after the execution of a confidentiality agreement.

(c) The Energy [Bureau] shall keep the documents submitted for its consideration out of public reach only in exceptional cases. In these cases, the information shall be duly safeguarded and delivered exclusively to the personnel of the Energy [Bureau] who needs to know such information under nondisclosure agreements. However, the Energy [Bureau] shall direct that a non-confidential copy be furnished for public review.

(d) The Energy [Bureau] shall swiftly act on any privilege and confidentiality claim made by a person subject to its jurisdiction by means of a resolution to such purposes before any allegedly confidential information is disclosed.

4. In turn, Section 1.15 of Regulation No. 8701 provides that when a person who is required to submit information to the Energy Bureau considers such information to be privileged or confidential, the person shall identify the information it deems privileged or confidential, request the Energy Bureau to protect such information, and present arguments supporting the privilege or confidentiality claim. The Energy Bureau shall evaluate the petition and, if it

concludes the information merits protection, it shall proceed pursuant to Section 6.15 of Act No. 57.

5. SunE XVI respectfully requests that all the information contained in this motion and attached hereto be kept confidential in accordance with Section 1.15 of Regulation 8701. In compliance with the process to designate confidential information, SunE XVI hereby submits, under separate cover, a redacted version of the documents for which confidential treatment is sought. These documents have sensitive information, otherwise not available to the public, which SunE XVI prefers not to disclose and that could place SunE XVI at a competitive disadvantage. Moreover, Table 1 below contains a list of all the documents including information for which confidential treatment is requested.

Table 1				
Document Name	Pages	Date	Legal Basis	Discussion
Credentials for CAMS Solar Services LLC (Attachment 1)	Totality of Attachment 1	8/27/25	<ul style="list-style-type: none">• Act No. 57-2014, § 6.15• Regulation 8701, § 1.15	This document contains sensitive information which should not be available to the public. The disclosure of this information could cause CAMS Solar Services LLC economic harm, and the documents contain personal information of certain individuals which should not be disclosed.

6. SunE XVI respectfully requests that the Energy Bureau only grant access to the information contained in the document attached hereto to internal Energy Bureau personnel, counsel, and consultants subject to the execution of a confidentiality agreement.

WHEREFORE, Sun XVI respectfully moves this Honorable Energy Bureau to take notice of this submission, deem this supplemental description responsive to the August 7 R&O, confirm that

SunE XVI remains in compliance with Regulation 8701, § 2.02(A)(1)(d), and grant confidential treatment to the documents attached hereto.

Respectfully submitted, August 27, 2025.

McCONNELL VALDÉS LLC

Counsel for SunE XVI Lessor, LLC

PO Box 364225

San Juan, Puerto Rico 00936-4225

270 Muñoz Rivera Avenue

San Juan, Puerto Rico 00918



André J. Palerm Colón

PR Supreme Court ID No. 21196

(787) 250-5636

apc@mcvpr.com

ATTACHMENT 1

