

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

**NEPR**

**Received:**

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**IN RE: PUERTO RICO  
ELECTRIC POWER  
AUTHORITY RATE REVIEW**

**CASE NUM. NEPR-AP-2023-0003**

**Subject: SOLAR UNITED NEIGHBORS  
Motion to Intervene  
Rate Review Proceeding**

**MOTION SUBMITTING EXPERT TESTIMONY OF DR. AHMAD FARUQUI  
ON BEHALF OF SOLAR UNITED NEIGHBORS**

**TO THE HONORABLE PUERTO RICO ENERGY BUREAU:**

Comes now SOLAR UNITED NEIGHBORS, represented by the undersigned attorney, and very respectfully STATES and PRAYS:

1. On August 21, 2025, SOLAR UNITED NEIGHBORS ("SUN") filed its Motion to Intervene, stating:

"In addition to contributing valuable insights based on its years of promoting energy projects and advocacy, SUN expects to present the expert testimony of Dr. Ahmad Faruqui, Ph.D., a distinguished energy economist whose consulting practice encompasses regulation, tariff and rate design, load flexibility, distributed energy resources, demand forecasting, decarbonization, electrification, and energy efficiency. SUN will engage Dr. Faruqui as its expert in this case. Over the course of his career, he has advised clients in twelve (12) countries across five (5) continents on complex energy matters."

2. On August 29, 2025, the Honorable Hearing Examiner, Scott Hempling, Esq., granted SUN's Motion to Intervene, subject to the following conditions: SUN must coordinate with SESA to avoid duplication, and SUN must accept this proceeding's scope, which is to set rates.

3. As anticipated, SUN respectfully submits for the record the direct expert testimony of Dr. Ahmad Faruqui.

4. SUN hereby certifies that it is actively coordinating with SESA throughout this process.

5. SUN further acknowledges that this proceeding's scope is limited to rate-setting.

However, as noted in its Motion to Intervene:

"This adjudicative proceeding may adversely impact the interests of the people and communities that SUN has assisted—and will continue to assist—in going solar. Any disruptions to, or modifications of, existing rate structures, particularly changes to net metering policies and compensation, would directly affect the interests of the individuals and communities served by SUN."

6. Accordingly, SUN respectfully submits that Dr. Faruqui's testimony meaningfully contributes to the record of this rate case, particularly with respect to the implications for net metering policies arising from several issues under discussion. SUN also recognizes that, as indicated by the Hearing Examiner during the September 4th conference, this rate case will not serve as the venue to redefine Puerto Rico's solar policies.

WHEREFORE, SOLAR UNITED NEIGHBORS respectfully requests that this Honorable Bureau take notice of, and admit into the record, the direct expert testimony of Dr. Ahmad Faruqui in the above-captioned proceeding.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 8<sup>th</sup> day of September 2025.

CERTIFICATION: WE HEREBY CERTIFY that this motion was filed using the PREB's electronic filing system and that electronic copies of this motion will be notified to the Hearing Examiner, Scott Hempling, [shempling@scotthemplinglaw.com](mailto:shempling@scotthemplinglaw.com), and that a copy was notified by electronic mail to: [mvalle@gmlex.net](mailto:mvalle@gmlex.net); [arivera@gmlex.net](mailto:arivera@gmlex.net); [jmartinez@gmlex.net](mailto:jmartinez@gmlex.net); [jgonzalez@gmlex.net](mailto:jgonzalez@gmlex.net); [nzayas@gmlex.net](mailto:nzayas@gmlex.net); [Gerard.Gil@ankura.com](mailto:Gerard.Gil@ankura.com); [Jorge.SanMiguel@ankura.com](mailto:Jorge.SanMiguel@ankura.com); [Lucas.Porter@ankura.com](mailto:Lucas.Porter@ankura.com); [katiuska.bolanos-lugo@us.dlapiper.com](mailto:katiuska.bolanos-lugo@us.dlapiper.com); [Yahaira.delarosa@us.dlapiper.com](mailto:Yahaira.delarosa@us.dlapiper.com); [margarita.mercado@us.dlapiper.com](mailto:margarita.mercado@us.dlapiper.com); [carolyn.clarkin@us.dlapiper.com](mailto:carolyn.clarkin@us.dlapiper.com); [andrea.chambers@us.dlapiper.com](mailto:andrea.chambers@us.dlapiper.com); [regulatory@genera-pr.com](mailto:regulatory@genera-pr.com); [legal@genera-pr.com](mailto:legal@genera-pr.com);

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