

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

**NEPR**

**Received:**

**Oct 24, 2025**

**4:57 PM**

**IN RE: REQUEST FOR CERTIFICATION  
BY PALMETTO SOLAR LLC**

**CASE NO.**

**SUBJECT: Request for Certification**

**MOTION TO REQUEST CERTIFICATION  
AND REQUEST FOR CONFIDENTIAL TREATMENT**

**TO THE HONORABLE ENERGY BUREAU:**

**COMES NOW**, Palmetto Solar LLC ("Palmetto"), represented by the undersigned legal counsel, and respectfully submits the following:

1. Palmetto respectfully petitions for certification as an electric service company and, pursuant to Section 3.03 of the *Amendment to Regulation No. 8618 on Certification, Annual Fees, and Operational Plans for Electric Service Companies in Puerto Rico*, Regulation 8701 of the February 17, 2016, hereby submits: (i) the Personal Information Form NEPR-B01 (**Attachment 1**); (ii) payment of the fee due upon submission of the Personal Information Form (**Attachment 2**); (iii) the Operational Report Form NEPR-B03 alongside its corresponding annex and attachments (**Attachment 3**); (iv) payment of the fee due upon submission of the Operational Report Form (**Attachment 4**); (v) Request for Certification Form NEPR-B04 (**Attachment 5**); (vi) payment of the fee due upon submission of the Request for Certification Form (**Attachment 6**); (vii) a statement that attests the provisions of minimum financial resources of the company (**Attachment 7**); (viii) a statement affirming the sufficiency of the company's human resources (**Attachment 8**); and (ix) a copy of the permits necessary to operate and do business in Puerto Rico (**Attachment 9**).

## Confidential Treatment Requested

2. Palmetto respectfully informs the Honorable Energy Bureau that it is a newly incorporated entity in PR that scheduled to begin Installation of rooftop solar photovoltaic systems in November 2025.
3. With respect to Attachment 7, Palmetto respectfully informs that it is a newly created entity that has yet to generate revenues. In addition, [REDACTED]  
[REDACTED]  
[REDACTED].
4. With respect to Attachment 8, Palmetto respectfully informs the Honorable Energy Bureau that [REDACTED]  
[REDACTED]
5. Section 4.02(B) of Regulation 8701 mandates all electric service companies operating in Puerto Rico to inform the Energy Bureau of their annual gross revenue. Palmetto respectfully requests that the Bureau take notice that this requirement does not apply in its case, as the company has not yet generated any revenue in Puerto Rico. Nevertheless, the audited financial statements of the U.S. affiliate have been submitted for the Bureau's review and consideration.
6. Palmetto hereby respectfully requests that confidential treatment be afforded to this motion and its corresponding attachments. Section 6.15 of Act No. 57 of May 17, 2014, as amended, provides:

If a person having the obligation to submit information to the Energy [Bureau] understands the information to be submitted is privileged or confidential, [such person] may request said [Bureau] to give [privileged or confidential] treatment subject to the following:

(a) if the Energy [Bureau], after due evaluation, understands the information should be protected, it shall find a way to grant this protection in the manner that impacts less the public, transparency and the rights of the parties involved in the

## Confidential Treatment Requested

administrative proceeding under which the alleged confidential document is being filed.

(b) To such effects, the Energy [Bureau] may grant access to the document, or to portions of the document that are privileged, only to counsel and external consultants involved in the administrative proceeding after execution of a confidentiality agreement.

(c) The Energy [Bureau] shall keep documents presented before it completely out of public scrutiny only in exceptional cases. In such cases, the information shall be duly safeguarded and delivered exclusively to Energy [Bureau] personnel on a need-to-know basis, under non-disclosure rules. However, the Energy [Bureau] shall order that a non-confidential version for public review be submitted.

(d) Any claim of privileged or confidential information by a person under the jurisdiction of the Energy [Bureau] must be ruled in an expedited manner by the [Bureau] through a resolution to such effects, before any confidential information alleged by a party is disclosed.

7. In turn, Section 1.15 of the 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.
8. Palmetto 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, Palmetto hereby submits redacted versions of the documents for which confidential treatment is sought. These documents have

## Confidential Treatment Requested

sensitive information, otherwise not available to the public, which Palmetto prefers not to disclose and that could place Palmetto at a competitive disadvantage.

9. Palmetto respectfully requests that this Honorable Energy Bureau only grant access to said information to internal Energy Bureau personnel, counsel, and consultants subject to the execution of a confidentiality agreement.

**WHEREFORE**, Palmetto Solar LLC respectfully requests that the Honorable Bureau take notice of this Motion to Request Certification and Request for Confidential Treatment, declare Palmetto an electric service company, and afford confidential treatment to this motion and its corresponding attachments.

Respectfully submitted, on September 29, 2025.

**McCONNELL VALDÉS LLC**

*Counsel for Palmetto Solar LLC*

PO Box 364225

San Juan, Puerto Rico 00936-4225

270 Muñoz Rivera Avenue

San Juan, Puerto Rico 00918

[www.mcvpr.com](http://www.mcvpr.com)



André J. Palerm Colón

PR Supreme Court ID No. 21196

Tel. (787) 250-5636

[apc@mcvpr.com](mailto:apc@mcvpr.com)

# **ATTACHMENT 1**



## GOVERNMENT OF PUERTO RICO

Public Service Regulatory Board

Puerto Rico Energy Bureau

## FORM

**PERSONAL INFORMATION  
ELECTRIC POWER COMPANIES**
☒ **New Information**
☐ **Information Update**

## Instructions:

- When filling out this form, examine the provisions of Section 2.01 of Regulation No. 8701 and be sure to provide all the required information.
- Indicate N/A where the information is not applicable.
- Provide a Complementary Sheet for Affiliate and Subsidiary Entities (NEPR-B02) for each affiliated and subsidiary entity it possesses.
- Use Complementary Sheet (NEPR-Z01) if additional space is required.
- Include the required documents according to the Regulation No. 8701, enumerated in the Annexes section.
- Present a copy of the payment evidence when submitting this Form.

**A. Electric Power Company General Information**

- Company Name: Palmetto Solar LLC
- Organizational Form: ☐ Corporation ☒ Limited Liability Company  
☐ Society ☐ Other: \_\_\_\_\_
- Jurisdiction where it was organized: Delaware
- Fiscal Year Start Date:
- Fiscal Year End Date:

**B. Information of Offices in Puerto Rico**
1. Principal Office

- Physical Address: AGUSTIN STAHL, CARR. 174 A-10  
BAYAMON, PR, 00956
- Postal Address: AGUSTIN STAHL, CARR. 174 A-10  
BAYAMON, PR, 00956

2. Secondary Office

- Physical Address: N/A



Edificio World Plaza, 268 Ave. Muñoz Rivera, Suite 202 (Nivel Plaza), Hato Rey P.R. 00918

Tel. 787.523.6262 • [www.energia.pr.gov](http://www.energia.pr.gov)

NEPR-B01 (Rev. January 2019) "Personal Information of Electric Power Companies"

Reference: Amendment to Regulation No. 8618, on Certification, Annual Fees, and Operational Plans for Electric Power Companies in Puerto Rico.

b. Postal  
Address:

**Secondary Office**

a. Physical  
Address:

N/A

b. Postal  
Address:

**Secondary Office**

a. Physical  
Address:

N/A

b. Postal  
Address:

**C. Addresses for Receipt of Notifications**

(Indicate the addresses where notifications of matters before the Energy Bureau are to be received.)

1. Physical  
Address:

2. Authorized person to receive notifications personally:

3. Postal Address:

4. E-mail:

**D. Information for Designated Contact before the Energy Bureau**

1. Name:

3. Physical W  
Address:

4. Postal W  
Address:

5. Office Pho

7. E-mail:

**E. Information of the Company's Resident Agent**

1. Name: COGENCY GLOBAL INC.

2. Physical  
Address: AGUSTIN STAHL, CARR. 174 A-10  
BAYAMON, PR, 00956

3. Postal Address: 600 17th Street, Suite 1450S  
Denver, CO 80202

4. Office Phone: 720-306-0107 5. Mobile Phone: \_\_\_\_\_  
 6. E-mail: bmacarthur@cogencyglobal.com

**F. Information of Members of the Board of Directors or Governing Body and Executive Principals**

1. Name: \_\_\_\_\_ Position: Managing Member  
 Physical Address: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 Postal Address: \_\_\_\_\_  
 \_\_\_\_\_  
 Office Phone: \_\_\_\_\_ Mobile Phone: \_\_\_\_\_  
 E-mail: \_\_\_\_\_

2. Name: N/A Position: \_\_\_\_\_  
 Physical Address: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 Postal Address: \_\_\_\_\_  
 \_\_\_\_\_  
 Office Phone: \_\_\_\_\_ Mobile Phone: \_\_\_\_\_  
 E-mail: \_\_\_\_\_

3. Name: N/A Position: \_\_\_\_\_  
 Physical Address: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 Postal Address: \_\_\_\_\_  
 \_\_\_\_\_  
 Office Phone: \_\_\_\_\_ Mobile Phone: \_\_\_\_\_  
 E-mail: \_\_\_\_\_

4. Name: N/A Position: \_\_\_\_\_  
 Physical Address: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 Postal Address: \_\_\_\_\_  
 \_\_\_\_\_  
 Office Phone: \_\_\_\_\_ Mobile Phone: \_\_\_\_\_  
 E-mail: \_\_\_\_\_

5. Name: N/A Position: \_\_\_\_\_

Physical Address: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 Postal Address: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 Office Phone: \_\_\_\_\_ Mobile Phone: \_\_\_\_\_  
 E-mail: \_\_\_\_\_

### G. Information of Shareholders or Owners of the Company

(Indicate the required information if the participation percent is equal or greater than thirty-five percent (35)).

1. Name:	_____	Position:	_____
2. Name:	_____	Position:	_____
3. Name:	_____	Position:	_____
4. Name:	_____	Position:	_____
5. Name:	_____	Position:	_____

Annexes: (Mark the documents included with the Personal Information Form)

- ☒ Copy of the Company's Incorporation and Register Certificate.
- ☒ Copy of the Good Standing Certificate issued by the Puerto Rico State Department.
- ☐ Copy of the Authorization Certificate to do business in Puerto Rico.
- ☐ Complementary Sheet (NEPR-Z01).
- ☐ Complementary Sheet for Affiliate or Subsidiary Entities Information (NEPR-B02).
- ☐ Other: \_\_\_\_\_

I certify that the presented information on this form is correct and complete.

_____	President	_____	September 2, 2025
Name of Designated Contact	Position	Signature	Date



DEPARTMENT OF STATE  
GOVERNMENT OF PUERTO RICO

## CERTIFICATE OF GOOD STANDING

I, **Rosachely Rivera Santana**, **Secretary of State** of the Government of Puerto Rico,

**CERTIFY:** That, pursuant to the provisions of Puerto Rico's General Law of Corporations, **PALMETTO SOLAR, LLC**, register number [REDACTED], a **for profit foreign** Limited Liability Company, organized under the laws of **Delaware** and duly authorized to do business in Puerto Rico since **September 2, 2025**, is in good standing until **April 15, 2026**, date on which its first Annual Fee is due.



**IN WITNESS WHEREOF**, the undersigned by virtue of the authority vested by law, hereby issues this certificate and affixes the Great Seal of the Government of Puerto Rico, in the City of San Juan, Puerto Rico, today, **September 2, 2025**.

**Rosachely Rivera Santana**  
Secretary of State

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To validate this certificate go to: <https://estado.pr.gov/>

This certificate is valid for one (1) year from issue date (Regulation 8688, Art. 26). However, it is subject to faithful compliance with the provisions of Chapter XV and Chapter XXI of Act 164-2009, as applicable.

Certificate Validation Number: **844659-52935889**

## **CERTIFICATE OF LEGAL ENTITY**

I, **Rosachely Rivera Santana, Secretary of State** of the Government of Puerto Rico,

**CERTIFY:** That on **September 02, 2025**, **PALMETTO SOLAR, LLC** was registered in the Registry of Legal Entities under register number [REDACTED], in accordance with Act No. 55-2020, known as the "Puerto Rico Civil Code".

**IN WITNESS WHEREOF**, the undersigned by virtue of the authority vested by law, hereby issues this certificate and affixes the Great Seal of the Government of Puerto Rico, in the City of San Juan, Puerto Rico, today, **September 2, 2025**.

**Rosachely Rivera Santana**  
Secretary of State

## **CERTIFICATE OF AUTHORIZATION TO DO BUSINESS IN PUERTO RICO**

I, **Rosachely Rivera Santana, Secretary of State** of the Government of Puerto Rico;

**CERTIFY:** That **PALMETTO SOLAR, LLC**, register number [REDACTED], is a **Foreign For Profit Limited Liability Company** organized under the laws of Delaware duly authorized to do business in Puerto Rico on this **2nd of September, 2025 at 12:53 PM.**

**IN WITNESS WHEREOF**, the undersigned by virtue of the authority vested by law, hereby issues this certificate and affixes the Great Seal of the Government of Puerto Rico, in the City of San Juan, Puerto Rico, today, **September 2, 2025.**

**Rosachely Rivera Santana**  
Secretary of State



















# **ATTACHMENT 2**



# **ATTACHMENT 3**



# GOVERNMENT OF PUERTO RICO

Public Service Regulatory Board  
Puerto Rico Energy Bureau

## FORM

### OPERATIONAL REPORT ELECTRIC POWER COMPANIES

☒ New Report: Year \_\_\_\_\_ ☐ Report Update: Year \_\_\_\_\_

#### Instructions:

- When filling out this Form, examine the provisions of Section 2.02 of Regulation No. 8701 and be sure to provide all the required information.
- Indicate N/A where the information is not applicable.
- Use Complementary Sheet (NEPR-Z01) if additional space is required.
- Include the required documents according to the Regulation No. 8701, enumerated in the Annexes section.
- When submitting this Form, be sure to include the evidence of payment of the corresponding filing fee.

#### A. Electric Power Company General Information

1. Company Name: Palmetto Solar, LLC

2. Type of Electric Service:
- |  |  |
|--|--|
| <input type="checkbox"/> Fossil fuel or renewable energy generation with aggregated capacity of one hundred (100) MW or less | <input type="checkbox"/> Fossil fuel or renewable energy generation with aggregated capacity of more than one hundred (100) MW |
| <input checked="" type="checkbox"/> Distributed Generators with aggregated capacity of one (1) MW or more                    |  |
| <input type="checkbox"/> Energy Storage  | <input type="checkbox"/> Electric Power Billing  |
| <input type="checkbox"/> Energy Resale   | <input type="checkbox"/> Wheeling  |

#### B. Operational Report General Information

☒ This report ***has been referred to*** the Energy Public Policy Program of the Department of Economic Development and Commerce for review and comments prior to its filing before the Energy Bureau.

☐ This report ***has not been referred to*** the Energy Public Policy Program of the Department of Economic Development and Commerce for review and comments prior to its filing before the Energy Bureau. (Explain the reasons why it was not referred to the EPPP.)

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Edificio World Plaza, 268 Ave. Muñoz Rivera, Suite 202 (Nivel Plaza), Hato Rey P.R. 00918

Tel. 787.523.6262 • [www.energia.pr.gov](http://www.energia.pr.gov)

NEPR- B03 (Rev. February 2019) "Operational Report of Electric Power Companies"

Reference: Amendment to Regulation No. 8618, on Certification, Annual Fees, and Operational Plans for Electric Power Companies in Puerto Rico.

Annexes: (Mark the documents that are included with the Operational Report Form)

- Distributed Generators with aggregated capacity of one (1) MW or more, and fossil fuel or renewable energy generation with aggregated capacity of one hundred (100) MW or less:
  - ☒ Projection of the percent of the total demand that it intends to meet in Puerto Rico (Section 2.02 (A)(1)(a)).
  - ☒ Information regarding charges and rates, and the company efforts to orient clients and promote efficient electric energy consumption (Section 2.02 (A)(1)(b)).
  - ☒ Projection of capital investments for the next year after the submission of the Report (Section 2.02 (A)(1)(c)).
  - ☒ Contact information and credentials of the entity to be hired in case that the system operation is contracted (Section 2.02 (A)(1)(d)).
- Report on generation of energy:
  - ☒ Total Generation, in MWh, produced by the generation system during the period prior to the submission of the Operational Report.
  - ☒ Net Generation (Total Generation – Consumption), in MWh, produced by the generation system during the period prior to the submission of the Operational Report.
- Report on the availability of the power generation system:
  - ☒ Schedule of operation during the period prior to the submission of the Operational Report.
  - ☒ Capacity Factor the period prior to the submission of the Operational Report.
- Report on outages of the power generation system:
  - ☒ Scheduled Outages: should specify the date, hour, duration and purpose of the outages that have occurred on the company's electric equipment, during the period prior to the submission of the Operational Report.
  - ☒ Non-scheduled Outages: should specify the date, hour, duration and purpose of the outages that have occurred on the company's electric equipment, during the period prior to the submission of the Operational Report.
- Fossil fuel or renewable energy generation with aggregated capacity of more than one hundred (100) MW:
  - ☐ Information required in Section 2.02 (A)(2)(a).
  - ☐ Operational budget for the current fiscal year (Section 2.02 (A)(2)(b)).
  - ☐ Reports of the changes the company foresees, plans for, or envisages in its operational budget for the following three (3) years (Section 2.02 (A)(2)(c)).
  - ☐ Studies regarding the cost of electric services the company provides (Section 2.02 (A)(2)(d)).
  - ☐ Studies and reports about the average frequency (hertz) of the electric power system during the three (3) fiscal years prior to the submission of the Report (Section 2.02 (A)(2)(e)).
  - ☐ Reports regarding operation and maintenance during the three (3) fiscal years prior to the submission of the Report (Section 2.02 (A)(2)(f)).
  - ☐ Reports about the electric power outages, scheduled and non-scheduled that have occurred during the three (3) fiscal years prior to the submission of the Report (Section 2.02 (A)(2)(g)).
  - ☐ Reports regarding requests for wheeling (Section 2.02 (A)(2)(h)).
  - ☐ Contact information and credentials of the entity to be hired in case that the system operation is contracted (Section 2.02 (A)(2)(i)).
- Report on generation of energy:
  - ☐ Total Generation, in MWh, produced by the generation system during the period prior to the submission of the Operational Report.
  - ☐ Net Generation (Total Generation – Consumption), in MWh, produced by the generation system during the period prior to the submission of the Operational Report.
- Report on the availability of the power generation system:
  - ☐ Schedule of operation during the period prior to the submission of the Operational Report.
  - ☐ Capacity Factor the period prior to the submission of the Operational Report.

▪ **Energy Storage:**

- ☐ Projection of capital investments for the next three (3) years after the submission of the Report (Section 2.02 (A)(3)(a)).
- ☐ Reports regarding improvements on the electric power system behavior (Section 2.02 (A)(3)(b)).

▪ **Electric Power Billing or Resale:**

- ☐ Description of the service and an estimate of the quantity of clients to which the service will be provided (Section 2.02 (A)(4)(a)).
- ☐ Information regarding charges and rates of the company (Section 2.02 (A)(4)(b)).
- ☐ Contact information and credentials of the entity to be hired in case that the system operation is contracted (Section 2.02 (A)(4)(c)).

▪ **Wheeling:**

- ☐ Projection of the percent of the total demand that it intends to meet in Puerto Rico (Section 2.02 (A)(5)(a)).
- ☐ Projection of capital investments for the next three (3) years after the submission of the Report (Section 2.02 (A)(5)(b)).
- ☐ Reports regarding requests for energy transmission or wheeling (Section 2.02 (A)(5)(c)).
- ☐ Complementary Sheet (NEPR-Z01).
- ☐ Other: \_\_\_\_\_

I certify that the presented information on this form is correct and complete.

Name of Designated Contact

Position

Signature

Date

## CONFIDENTIAL TREATMENT REQUESTED

### **Requirement: Sec. 2.02(A)(1)(a) of Regulation 8701**

Projection of the percent of total demand intended to meet in Puerto Rico.

Response: Per the Puerto Rico Electric Power Authority's ("PREPA") draft Integrated Resource Plan 2018-2019 dated June 7, 2019 (the "Draft IRP"), PREPA forecasts a total energy demand of 18,665 GWh for fiscal year 2024, before Energy Efficiency. See Exhibits 3-11 and 3-12 of the Draft IRP, Ex. 1.0. After Energy Efficiency, PREPA forecasts a total energy demand of 16,659 GWh for the fiscal year 2024. See Exhibit 3-16 of the Draft IRP. However, considering the impact of customer-owned generation (distributed generation and combined-heat and power) as well as the aforementioned Energy Efficiency, PREPA forecasts a total energy demand of 15,333 GWh (or 15,333,000 MWh) for fiscal year 2024. See Exhibit 3-18 of the Draft IRP.

[REDACTED]

### **Requirement: Sec. 2.02(A)(1)(b) of Regulation 8701**

Information regarding the charges and rates, and company efforts to guide clients and promote efficient electric energy consumption.

Response: [REDACTED]

[REDACTED]

### **Requirement: Sec. 2.02(A)(1)(c) of Regulation 8701**

Projection of capital investments for the next year after submission of operational report.

Response: [REDACTED]

[REDACTED]

## CONFIDENTIAL TREATMENT REQUESTED

### **Requirement:** Sec. 2.02(A)(1)(d) of Regulation 8701

Contact information and credentials of the entity to be hired in case system operation is contracted

Response: Any and all installation and/or servicing work related to the systems will be contracted through licensed contractors with proper DACO credentials.

- **Contractor:** [REDACTED]

- [REDACTED]

- [REDACTED]

**Description of Services:** Residential solar and storage installation company

- **Contractor:** [REDACTED]

- [REDACTED]

- [REDACTED]

**Description of Services:** Residential solar and storage installation company

### **Requirement:** Resolution and Order dated February 12, 2019 (CEPR-MI-2015-0006)

Total generation, in MWh, produced by the system during the period prior to the filing of the operational report.

Response: [REDACTED]

## CONFIDENTIAL TREATMENT REQUESTED

**Requirement:** Resolution and Order dated February 12, 2019 (CEPR-MI-2015-0006)

Net Generation (total generation minus consumption), in MWh, produced by the system during the period prior to the filing of the operational report.

Response: [REDACTED]

**Requirement:** Resolution and Order dated February 12, 2019 (CEPR-MI-2015-0006)

Hours of operation during the period prior to the filing of the operational report.

Response: [REDACTED]

**Requirement:** Resolution and Order dated February 12, 2019 (CEPR-MI-2015-0006)

Capacity factor during the period prior to the filing of the operational report.

Response: [REDACTED]

**Requirement:** Resolution and Order dated February 12, 2019 (CEPR-MI-2015-0006)

Scheduled interruption (specifying date, time, duration, and purpose of interruptions of electrical equipment of the company) during the period prior to the filing of the operational report.

Response: [REDACTED]

# **ATTACHMENT 4**



# **ATTACHMENT 5**



# GOVERNMENT OF PUERTO RICO

Public Service Regulatory Board  
Puerto Rico Energy Bureau

## FORM

### REQUEST FOR CERTIFICATION ELECTRIC POWER COMPANIES

☒ New Request

☐ Amended Request

☐ Request to Amend

#### Instructions:

- When filling out this form, examine the provisions of Section 3.03 of Regulation No. 8701 and be sure to provide all the required information.
- Indicate N/A where the information is not applicable.
- Use Complementary Sheet (NEPR-Z01) if additional space is required.
- Include the required documents according to the Regulation No. 8701, enumerated in the Annexes section.
- Present a copy of the payment evidence when submitting this Form.

#### A. Electric Power Company General Information

1. Company Name: Palmetto Solar LLC

☐ Fossil fuel or renewable energy generation with aggregated capacity of one hundred (100) MW or less

☐ Fossil fuel or renewable energy generation with aggregated capacity of more than one hundred (100) MW

2. Type of Electric Service:

☒ Distributed Generators with aggregated capacity of one (1) MW or more

☐ Energy Storage

☐ Energy Resale

☐ Electric Power Billing

☐ Wheeling

3. Aggregated capacity of the company's generation (MW):

4. Annual energy billed (MWh):

5. Annual energy resold (MWh):

6. Energy sources used in installations:

#### B. Information of Electric Service Facilities

(Complete the following information for each facility where the company will provide services.)

1. Type of Facility:

☐ New

☐ Existing

☐ Existing under Renovation

N/A



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NEPR-B04 (Rev. January 2019) "Request for Certification of Electric Power Companies"

Reference: Amendment to Regulation No. 8618, on Certification, Annual Fees, and Operational Plans for Electric Power Companies in Puerto Rico.

Physical Address of Facility: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Postal Address of Facility: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Indicate if the company is the owner of the facility: ☐ Yes ☐ No  
 Specify the title or legal business whereby it is in possession: \_\_\_\_\_  
 \_\_\_\_\_

Territorial Impact: Municipality: \_\_\_\_\_ Neighborhood: \_\_\_\_\_  
 Sector: \_\_\_\_\_ Other: \_\_\_\_\_

2. Type of Facility: ☐ New ☐ Existing ☐ Existing under Renovation

Physical Address of Facility: N/A  
 \_\_\_\_\_  
 \_\_\_\_\_

Postal Address of Facility: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Indicate if the company is the owner of the facility: ☐ Yes ☐ No  
 Specify the title or legal business whereby it is in possession: \_\_\_\_\_  
 \_\_\_\_\_

Territorial Impact: Municipality: \_\_\_\_\_ Neighborhood: \_\_\_\_\_  
 Sector: \_\_\_\_\_ Other: \_\_\_\_\_

3. Type of Facility: ☐ New ☐ Existing ☐ Existing under Renovation

Physical Address of Facility: N/A  
 \_\_\_\_\_  
 \_\_\_\_\_

Postal Address of Facility: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Indicate if the company is the owner of the facility: ☐ Yes ☐ No  
 Specify the title or legal business whereby it is in possession: \_\_\_\_\_  
 \_\_\_\_\_

Territorial Impact: Municipality: \_\_\_\_\_ Neighborhood: \_\_\_\_\_  
 Sector: \_\_\_\_\_ Other: \_\_\_\_\_

4. Type of Facility: ☐ New ☐ Existing ☐ Existing under Renovation

Physical Address of Facility: N/A  
 \_\_\_\_\_  
 \_\_\_\_\_

Postal Address of Facility:

Indicate if the company is the owner of the facility:

☐ Yes ☐ No  
Specify the title or legal business whereby it is in possession:

Territorial Impact:

Municipality:  
Sector:

Neighborhood:  
Other:

5. Type of Facility:

☐ New

☐ Existing

☐ Existing under Renovation

Physical Address of Facility:

N/A

Postal Address of Facility:

Indicate if the company is the owner of the facility:

☐ Yes ☐ No  
Specify the title or legal business whereby it is in possession:

Territorial Impact:

Municipality:  
Sector:

Neighborhood:  
Other:

6. Type of Facility:

☐ New

☐ Existing

☐ Existing under Renovation

Physical Address of Facility:

N/A

Postal Address of Facility:

Indicate if the company is the owner of the facility:

☐ Yes ☐ No  
Specify the title or legal business whereby it is in possession:

Territorial Impact:

Municipality:  
Sector:

Neighborhood:  
Other:

7. Type of Facility:

☐ New

☐ Existing

☐ Existing under Renovation

Physical Address of Facility:

Postal Address of \_\_\_\_\_  
Facility: \_\_\_\_\_  
\_\_\_\_\_

Indicate if the company is the  
owner of the facility:

☐ Yes

☐ No

Specify the title or legal business  
whereby it is in possession: \_\_\_\_\_

Territorial  
Impact:

Municipality: \_\_\_\_\_  
Sector: \_\_\_\_\_

Neighborhood: \_\_\_\_\_  
Other: \_\_\_\_\_

**Annexes:** (Mark the documents included with the Request for Certification Form)

- ☐ Information regarding the contracts or legal transactions with PREPA or another electric power company (Section 3.03 (A)(2)).
- ☐ Statement certified by a Certified Public Accountant that attests the provisions of minimum financial resources of the company (Section 3.03 (A)(3)).
- ☐ Statement affirming the sufficiency of the company's human resources (Section 3.03 (A)(4)).
- ☐ Copy of permits, authorizations and endorsements obtained to operate, do business and provide services in Puerto Rico (Section 3.03 (A)(5)).
- ☐ A certification stating that the company has obtained all necessary permits, from the appropriate public entities, for the construction of new facilities (Section 3.03 (B)(1)(b)).
- ☐ A certification that attests that the company has the financial capacity and solvency to finance the construction and operation of new or under renovation facilities (Section 3.03 (B)(1)(b)).
- ☐ Description of technical specifications of units and equipment, among others, used for the provision of the service (Section 3.03 (B)(1)(c)).
- ☐ Amount of installed systems, installed capacity and number of clients by electric service region (Section 3.03 (B)(2)(b)).
- ☐ List of equipment used for the provision of services (Section 3.03 (B)(2)(c)).
- ☐ Complementary Sheet (NEPR-Z01).
- ☐ Other:

**I certify that the presented information on this form is correct and complete.**

\_\_\_\_\_

President

\_\_\_\_\_

September 2, 2025

Name of Designated Contact

Position

Signature

Date

**OFFICIAL USE ONLY**

**NEPR-CT-** \_\_\_\_\_ - \_\_\_\_\_

**Determination:** The request, with the annexes has been evaluated and the determination is:

☐ Approved

☐ Conditioned to: \_\_\_\_\_

☐ Requires Amendments

☐ Denied

**Observations:**



# **ATTACHMENT 6**



# **ATTACHMENT 7**



**VALDES, GARCIA, MARIN & MARTINEZ, LLP**  
CERTIFIED PUBLIC ACCOUNTANTS AND CONSULTANTS

**CERTIFICATION**

September 26, 2025

In accordance with Section 3.03(A)(3) of the Puerto Rico Energy Bureau's *Amendment to Regulation No. 8618 on Certification, Annual Fees, and Operational Plans for Electric Service Companies in Puerto Rico*, Regulation 8701 of the 17th of February, 2016, as amended, I hereby certify that Palmetto Solar LLC has sufficient financial and economic resources to operate and offer its proposed solar energy services in Puerto Rico, including making the necessary investments in connection with such services in the year following the issuance of this Certification.

Palmetto Solar LLC is a newly incorporated entity in Puerto Rico that has not yet generated revenue locally. For its first year of operations, the company will be funded by its U.S. affiliate, [REDACTED]. This certification is supported by the audited financial statements of the U.S. entity, which are attached hereto.

*Valdés, García, Marín & Martínez, LLP*

Valdés, García, Marín & Martínez, LLP  
Certified Public Accountants of Puerto Rico  
[REDACTED]





**Consolidated Financial Statements**  
**December 31, 2024**













































































# **ATTACHMENT 8**

**STATEMENT OF SUFFICIENT HUMAN RESOURCES**

August 29, 2025

Section 3.03(A)(4) of the Puerto Rico Energy Bureau's *Amendment to Regulation No. 8618 on Certification, Annual Fees, and Operational Plans for Electric Service Companies in Puerto Rico*, Regulation 8701 of the February 17, 2016, generally requires electrical service companies that intend to operate or offer electrical service in Puerto Rico to state that they have the necessary human resources (technical, professional, and administrative) to operate and provide the services it intends to offer in Puerto Rico.

Palmetto Solar LLC has no direct employees in Puerto Rico. However, it hires a competent company for all asset management and operation services. Accompanying this certification is a list of the technical and professional qualifications of the personnel that carry out these operations.

I hereby certify to the best of my knowledge and belief that Palmetto Solar LLC, by virtue of the aforementioned personnel, has sufficient technical, professional, and administrative resources to operate and provide its solar energy services in Puerto Rico.







































