NEPR

Received:

Oct 28, 2025

9:58 AM

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

IN RE: REQUEST FOR CERTIFICATION BY SUNSTRONG MANAGEMENT LLC	**CASE NO.** **SUBJECT:** Request for Certification

MOTION TO REQUEST CERTIFICATION AS AN ELECTRIC SERVICE COMPANY AND AS A DR AGGREGATOR AND REQUEST FOR CONFIDENTIAL TREATMENT

TO THE HONORABLE ENERGY BUREAU:

COMES NOW, SunStrong Management LLC ("SunStrong"), represented by the undersigned legal counsel, and respectfully submits the following:

I. CERTIFICATION AS AN ELECTRIC SERVICE COMPANY

1. SunStrong hereby respectfully submits its request for certification as an electric service company, as required by 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, as amended ("Regulation 8701"). The following documents are attached hereto: (i) the Personal Information Form NEPR-B01, a copy of the permits necessary to operate and do business in Puerto Rico (**Attachment 1**); (ii) the Operational Report Form NEPR-B03 alongside its corresponding annex and attachments (**Attachment 2**); (iii) Request for Certification Form NEPR-B04 (**Attachment 3**);[1] (vi) a statement affirming the sufficiency of the company's human

[1] Please note the attached Request for Certification Form marks incorrect annexes included with the form. SunStrong respectfully requests the Energy Bureau disregard the selected annexes.

resources (**Attachment 4**); and (vii) evidence of payment of the fees due upon submission of the Personal Information Form, the Operational Report Form, and the Request for Certification Form (**Attachment 5**)..

2. Section 3.03(A)(3) Regulation 8701 requires electric service companies to submit a certified statement from a certified public accountant that confirms that they possess sufficient financial and economic resources to operate and offer their proposed solar energy services, including making the necessary investments in connection with such services in the year following the issuance of the certification.

3. [redacted] (**Attachment 6**).

II. CERTIFICATION AS A DR AGGREGATOR

4. On December 10, 2020, the Bureau adopted the *Regulation for Demand Response*, Regulation 9246 ("Regulation 9246"). Among other things, Regulation 9246 required the Puerto Rico Electric Power Authority ("PREPA") or its successor, LUMA Energy, LLC and LUMA Energy ServCo, LLC (jointly, "LUMA"), to file a three-year Demand Response ("DR") Plan within six months of the effective date of the Regulation and to develop a demand response program to provide cost effective DR resources under its DR Plan.

5. On February 1, 2022, the Energy Bureau issued a Resolution and Order which, among other things, required that LUMA file the DR Transition Period Plan ("TPP").

6. Thereafter, on June 21, 2022, LUMA submitted its Proposed TPP to the Honorable Energy Bureau. As part of the TPP, and in compliance with its Regulation 9246 mandate, LUMA launched an Emergency DR program.
7. Pursuant to Section 2.02 of Regulation 9246, DR Aggregators must, in addition to meeting the requirements of Regulation 8701, provide the following information in their request for certification: (a) describe the type of DR resources it seeks to develop and aggregate; (b) identify the DR program or programs offered by PREPA that it intends to utilize on behalf of its customers; (c) provide its privacy and data security policy; and (d) if the DR Aggregator intends to serve residential or small commercial customers, provide the standard form letter or electronic communication and agreement to be submitted to each customer explaining the terms and conditions of participating in the DR service as required by Section 2.03(A)(1) of the Regulation.
8. In compliance with Section 2.02 of Regulation 9246 and the applicable requirements of Regulation 8701, SunStrong hereby respectfully requests that this Honorable Energy Bureau take notice of its intent to utilize LUMA's BEDPR on behalf of its customers.
9. SunStrong is committed to developing and aggregating DR resources through its Customer Battery Energy Sharing ("CBES") Program and SunStrong Virtual Power Plant Rewards Program. The CBES Program and SunStrong Virtual Power Plant Rewards Program provide SunStrong customers under the opportunity to participate in LUMA's BEDRP. Under the BEDRP, the CBES Program and SunStrong Virtual Power Plant Rewards Program, participants receive compensation for operating their behind-the-meter batteries during times when all generation resources are in use, and LUMA determines that it will not be able to meet the forecast energy requirements ("BEDPR Events"). During BEDRP Events, SunStrong will dispatch customer's battery energy

storage systems ("BESS"). Importantly, SunStrong maintains discretion over the participation of devices in BEDRP Events, prioritizing concerns such as grid resiliency and potential grid failures. This approach ensures that while contributing to the stabilization of the grid, the program also considers the safety and reliability needs of the participants.

10. SunStrong hereby provides this Honorable Energy Bureau with copies of its Privacy and Data Security Policy (**Attachment A**) and the standard electronic communications (**Attachment B**) submitted to its customers regarding the CBES Program and SunStrong Virtual Power Plant Rewards Program.
11. Moreover, in compliance with Section 5.01 of Regulation 9246, SunStrong respectfully attaches a copy of its Annual Report as part of the operational report submitted in SunStrong's request for certification as an electric service company (*See* **Attachment 2.01**).

III. REQUEST FOR CONFIDENTIAL TREATMENT

12. SunStrong hereby respectfully requests that confidential treatment be afforded to this motion and its corresponding attachments. Section 6.15 of Act 57-2014 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 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.

13. In turn, Section 1.15 of Regulation 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 57-2014.
14. SunStrong 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, SunStrong shall submit under separate cover redacted versions of the documents for which confidential treatment is sought. These documents have sensitive information, otherwise not available to the public, which SunStrong prefers not to disclose and that could place SunStrong at a competitive disadvantage.

15. SunStrong 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, SunStrong Management LLC respectfully requests that the Honorable Bureau take notice of this Motion to Request Certification as an Electric Service Company and as a DR Aggregator and Request for Confidential Treatment, declare SunStrong a certified electric service company, and a certified DR Aggregator, and afford confidential treatment to this motion and its corresponding attachments.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on October 28, 2025.

McCONNELL VALDÉS LLC
Counsel for SunStrong Managment LLC
PO Box 364225
San Juan, Puerto Rico 00936-4225
270 Muñoz Rivera Avenue
San Juan, Puerto Rico 00918
www.mcvpr.com

André J. Palerm Colón
PR Supreme Court ID No. 21196
Tel. (787) 250-5636
apc@mcvpr.com

ATTACHMENT 1

Docusign Envelope ID: AA670F18-421E-40E7-89FE-DAC28F4857AF

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

1. Company Name: SunStrong Management LLC
2. Organizational Form: ☐ Corporation ☒ Limited Liability Company ☐ Society ☐ Other: _____
3. Jurisdiction where it was organized: Delaware
4. Fiscal Year Start Date: [redacted]
5. Fiscal Year End Date: [redacted]

B. Information of Offices in Puerto Rico

1. Principal Office
   a. Physical Address: Corporation Service Company Puerto Rico,
   A4 Reparto Mendoza4
   Humacao, PR 00791
   b. Postal Address: Same as Physical Address
2. Secondary Office
   a. Physical Address: N/A

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: Corporation Service Company Puerto Rico, A4 Reparto Mendoza Humacao, PR 00791
2. Authorized person to receive notifications personally:
3. Postal Address: Same as Physical Address
4. E-mail: csc1@probitypr.com

D. Information for Designated Contact before the Energy Bureau

1. Name: [redacted] 2. Position: [redacted]
3. Physical Work Address:
4. Postal Work Address:
5. Office Phone: 6. Mobile Phone:
7. E-mail: [redacted]

E. Information of the Company's Resident Agent

1. Name: Corporation Service Company Puerto Rico,
2. Physical Address: A4 Reparto Mendoza Humacao, PR 00791
3. Postal Address: Same as Physical Address

4. Office Phone: 888-690-2882 5. Mobile Phone: _____
6. E-mail: csc1@probitypr.com

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

1. Name: [redacted]

Physical Address:

Postal Address:

Office Phone:

E-mail:

2. Name:

Physical Address:

Postal Address:

Office Phone:

E-mail:

3. Name:

Physical Address:

Postal Address:

Office Phone:

E-mail:

4. Name: _____ Position: _____

Physical Address: _____

Postal Address: _____

Office Phone: _____ Mobile Phone: _____

E-mail: _____

5. Name: _____ 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: [redacted] Position: [redacted]
2. Name: [redacted] Position: [redacted]
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.

[redacted]	CEO	[redacted]	10/27/2025
Name of Designated Contact	Position		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, **SUNSTRONG MANAGEMENT LLC**, register number **562067**, a **for profit foreign** Limited Liability Company, organized under the laws of **Delaware** and duly authorized to do business in Puerto Rico since **September 4, 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, **October 21, 2025.**

Rosachely Rivera Santana
Secretary of State

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: **863326-98842917**

DEPARTMENT OF STATE
GOVERNMENT OF PUERTO RICO

CERTIFICATE OF AUTHORIZATION TO DO BUSINESS IN PUERTO RICO

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

CERTIFY: That **SUNSTRONG MANAGEMENT LLC**, register number **562067** , is a **Foreign For Profit Limited Liability Company** organized under the laws of Delaware duly authorized to do business in Puerto Rico on this **4th of September, 2025 at 04:13 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 4, 2025.**

Rosachely Rivera Santana
Secretary of State

29624779 - $250.00

DEPARTMENT OF STATE
GOVERNMENT OF PUERTO RICO

CERTIFICATE OF LEGAL ENTITY

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

CERTIFY: That on **September 04, 2025**, **SUNSTRONG MANAGEMENT LLC** was registered in the Registry of Legal Entities under register number **562067**, 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 4, 2025.**

Rosachely Rivera Santana
Secretary of State

ATTACHMENT 2

Docusign Envelope ID: AA670F18-421E-40E7-89FE-DAC28F4857AF

GOVERNMENT OF PUERTO RICO

Public Service Regulatory Board
Puerto Rico Energy Bureau

FORM

OPERATIONAL REPORT
ELECTRIC POWER COMPANIES

☒ **New Report** ☐ **Report Update**

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.
- Present a copy of the payment evidence when submitting this Form.

A. Electric Power Company General Information

1. Company Name: Sunstrong Management LLC

2. Type of Electric Service:
   - ☐ 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
   - ☒ Distributed Generators with aggregated capacity of one (1) MW or more
   - ☐ Energy Storage
   - ☐ Electric Power Billing
   - ☐ Energy Resale
   - ☐ 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 for not referring the report to the EPPP.)

_____

_____

_____

_____

_____

Docusign Envelope ID: AA670F18-421E-40E7-89FE-DAC28F4857AF

Annexes: (Mark the documents 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)).

- 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 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)).

- 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 com[redacted]

[redacted]	CEO	[redacted]	10/27/2025
Name of Designated Contact	Position	Signature	Date

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 18,689 GWh for fiscal year 2025, 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 16,375 GWh for the fiscal year 2025. 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 14,996 GWh (or 14,996,000 MWh) for fiscal year 2025. 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]
- [redacted]
  - [redacted]
  - [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]

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: [redacted]

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]

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]

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

Non-Scheduled interruptions (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]

Requirement: Sec 2.02 (B)(1) of Regulation 9246

As part of the operational report submitted under 8701, DR Aggregator shall include a copy of the Annual Report as specified in Sec 5.01

Response: See Attachment 2.01

ATTACHMENT 2.01

Annual Report

Requirement: Sec 5.01 (A)of Regulation 9246

On an annual schedule established by the Energy Bureau, each DR Aggregator shall report to the Energy Bureau a description of the DR Aggregator's complete activities during the year, including a summary of the DR resources aggregated, the DR programs in which they are enrolled, and the performance of their resources during events when DR has been dispatched

Response:

[redacted]

[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

From:	André J Palerm Colón
To:	"yelitza.torres@ddec.pr.gov"; "energydirector@ddec.pr.gov"
Cc:	Carlos Fernandez Lugo
Subject:	RE: SunStrong Management LLC Operational Deport 2025
Date:	Tuesday, October 28, 2025 9:39:06 AM
Attachments:	Operational Report Form.pdf

Please find attached the signed Operational Report Form, excluded from the previous email.

Best regards,

From: André J Palerm Colón
Sent: Tuesday, October 28, 2025 9:35 AM
To: yelitza.torres@ddec.pr.gov; energydirector@ddec.pr.gov
Cc: Carlos Fernandez Lugo <Cfl@mcvpr.com>
Subject: SunStrong Management LLC Operational Deport 2025

Hi Yelitza,

Please find attached the Operational report filing for SunStrong Management LLC.

The attached document has been redacted to preserve the confidential and sensitive nature of the filing. SunStrong Management LLC has not found any legal or regulatory provisions pursuant to which the Puerto Rico Energy Public Policy Program or the Department of Economic Development and Commerce may grant confidential treatment of sensitive information such as that included in the operational report annex attached herewith. The confidentiality related provisions of Act 57-2014 do not apply to neither the Puerto Rico Energy Public Policy program nor the Department of Economic Development and Commerce.

Best,

ATTACHMENT 3

Docusign Envelope ID: AA670F18-421E-40E7-89FE-DAC28F4857AF

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: SunStrong Management LLC
2. Type of Electric Service:
   - ☐ 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
   - ☒ Distributed Generators with aggregated capacity of one (1) MW or more
   - ☐ Energy Storage
   - ☐ Electric Power Billing
   - ☐ Energy Resale
   - ☐ Wheeling
3. Aggregated capacity of the company's generation (MW): [redacted]
4. Annual energy billed (MWh): N/A
5. Annual energy resold (MWh): N/A
6. Energy sources used in installations: Solar irradiation

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

Docusign Envelope ID: AA670F18-421E-40E7-89FE-DAC28F4857AF

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: _____

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: _____

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: _____

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: _____

5. 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: _____ Neighborhood: _____
Sector: _____ Other: _____

6. 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: _____ Neighborhood: _____
Sector: _____ 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: _____ Neighborhood: _____

Sector: _____ 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 com[redacted]

[redacted]	CEO	[redacted]	10/27/2025
Name of Designated Contact	Position		Date

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

- ☐ Approved
- ☐ Requires Amendments
- ☐ Conditioned to: _____
- ☐ Denied

Observations:

_____

_____

_____

_____

_____

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Name	Position	Signature	Date

ATTACHMENT 4

ATTACHMENT 5

ATTACHMENT 6

ATTACHMENT A

ATTACHMENT B