

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

NEPR

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IN RE:

ENERGY EFFICIENCY AND DEMAND
RESPONSE TRANSITION PERIOD PLAN

CASE NO.: NEPR-MI-2022-0001

SUBJECT: Motion to Submit Monthly
Status Report on the CBES+ Program
for August 2025, in Compliance with Resolution
and Orders of May 20, 2025, and May 29, 2025

**MOTION TO SUBMIT MONTHLY STATUS REPORT ON THE CBES+ PROGRAM
FOR AUGUST 2025, IN COMPLIANCE WITH RESOLUTION AND ORDERS OF
MAY 20, 2025, AND MAY 29, 2025**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME now LUMA Energy, LLC (“ManagementCo”), and LUMA Energy ServCo, LLC (“ServCo”), (jointly referred to as “LUMA”), and respectfully state and request the following:

I. Introduction

As the Puerto Rico transmission and distribution system operator, LUMA is responsible for facilitating the implementation of Puerto Rico’s public energy policy, including key customer initiatives such as Energy Efficiency (“EE”) and Demand Response (“DR”) Programs, which are required by law and mandated by the Energy Bureau of the Puerto Rico Public Service Regulatory Board (“Energy Bureau”). Accordingly, since 2023, LUMA has been implementing a Transition Period Plan (“TPP”), containing various quick-start or pilot EE and DR programs, with the purpose of setting the stage for the design and implementation of larger scale, more permanent programs.

After successfully implementing a pilot battery DR program, called “Customer Battery Energy Sharing” (“CBES”), LUMA developed a permanent version of this program referred to as the Permanent CBES which was approved by the Energy Bureau and is currently being implemented. The Permanent CBES is designed to leverage customer battery storage systems to

increase the supply of energy available to the electric grid during peak demand periods, improve day-to-day service reliability and minimize the impact of load shedding. Relatedly, LUMA also developed and is implementing, as approved by the Energy Bureau, a CBES Emergency Expansion Program (referred to as “CBES+”) that increases available capacity under the CBES program during the period from May 31, 2025, through October 31, 2025, to address the projected generation shortfall during that period.

As per Energy Bureau directives, with this Motion LUMA is submitting, as *Exhibit 1*, a monthly report on the CBES+, which also includes the Permanent CBES, covering the month of August 2025.

II. Relevant Background and Procedural History

1. On October 23, 2024, the Energy Bureau issued a Resolution and Order (“October 23rd Resolution and Order”) in which among others, it ordered LUMA to file a proposed form of a permanent CBES program to be implemented in June 2025.¹

2. On January 31, 2025, LUMA filed with the Energy Bureau the proposed permanent CBES (“Permanent CBES Proposal”).²

3. On April 3, 2025, the Energy Bureau issued a Resolution and Order (“April 3rd Resolution and Order”) partially approving, among others, the Permanent CBES Proposal for three years with respect to all aspects of program design that were unchanged from the pilot stage and that dictate customer and aggregator interface to the program.³ The Energy Bureau also indicated

¹ See October 23rd Resolution and Order, pp. 3-5.

² See *Motion to Submit Permanent Customer Battery Energy Sharing Program Proposal in Compliance with Resolutions and Order of October 23, 2024, and December 5, 2024, and Motion to Submit Revised Energy Efficiency and Demand Response Transition Period Plan and Request for Modification of Deadlines Relating to Three-Year Energy Efficiency and Demand Response Plan* (“January 31st Motion”).

³ See April 3rd Resolution and Order, p. 2.

that it would address the necessary changes to the CBES based on stakeholder comments and the discussion at a Technical Conference scheduled for April 24, 2025.⁴

4. On April 24, 2025, the Energy Bureau held a Technical Conference, in which LUMA presented, among others, the Permanent CBES Proposal and a proposal to expand the CBES program for summer 2025, referred to as the “CBES Emergency Expansion” or “CBES +”.

5. On April 30, 2025, the Energy Bureau issued a Resolution and Order (“April 30th Order”) ordering LUMA to submit, among others, its detailed proposal for the CBES+.⁵

6. On May 8, 2025, LUMA submitted to the Energy Bureau its detailed proposal for the CBES+ (“CBES+ Proposal”), which provided for expanding the permanent CBES program during the summer of 2025 to reach a higher enrollment (around 60,000) and dispatch capacity (up to 50MW per four-hour event) and using auto-enrollment and traditional enrollment methods.⁶ The CBES+ Proposal described three implementation scenarios, one of which LUMA proposed for implementation (referred to as “Scenario B”) which consisted of extending the CBES+ beyond October 31, 2025 while maintaining the full fleet of customers enrolled for CBES+ for the rest of Fiscal Year (“FY”) 2026 with limited discharge of all batteries to meet resource needs.⁷ LUMA also provided a proposed budget for the CBES+ and requested the approval of a proposed cost recovery mechanism for program costs.⁸

7. On May 20, 2025, the Energy Bureau issued a Resolution and Order (“May 20th Order”) conditionally approving the CBES+ Proposal for Scenario B and the remaining

⁴ See *id.*

⁵ See April 30th Order, p. 2.

⁶ See *Motion to Submit Proposal for Expanded Customer Battery Energy Sharing Program and Revised Technical Conference Presentation in Compliance with Resolution and Order of April 30, 2025* (“May 8th Motion”), p. 8 and Exhibit 1. LUMA also emphasized the need to use a Grid-Edge Distributed Energy Resource Management System (“DERMS”) platform to implement the program. See *id.*, p. 8.

⁷ See *id.*, p. 9.

⁸ See *id.*, pp. 9-10.

unapproved portions of the Permanent CBES Proposal, subject to the fulfillment of responses to a Request of Information (“ROI”) included in the May 20th Order, on or before May 27, 2025.⁹ In addition, the Energy Bureau ordered LUMA to submit monthly status reports, on or before the 20th of the month, on the CBES+ for the summer season (June 2025 to October 2025), commencing in July 2025, including the information specified therein.¹⁰

8. On May 27, 2025, LUMA submitted responses to the ROI regarding the CBES+ Proposal in compliance with the May 20th Order.¹¹

9. On May 29, 2025, the Energy Bureau issued a Resolution and Order (“May 29th Order”) determining that LUMA had met the requirements of the May 20th Order and approving the CBES+ Proposal for Scenario B, as well as the remaining unapproved portions of LUMA’s Permanent CBES Proposal (“Permanent CBES”). Among various directives relating to the implementation of the CBES+ and the Permanent CBES,¹² the Energy Bureau established revised information requirements applicable to the monthly reports required by the May 20th Order.¹³

⁹ See May 20th Order, p. 2 and Attachment A.

¹⁰ See *id.*, p. 2. The Energy Bureau required that these reports include: (a) information on the incentives paid to date, total program costs to date, number of participants, broken-out by auto-enrolled and opt-in, number of events called, average event duration, average event participation rate, average reserve level, total nameplate capacity, total nameplate energy, average event length, average total capacity per event, and average total energy per event; and (b) an individual event summary table like the table provided in Table 7: CBES Event-by-Event Summary on page 26 of Exhibit 1 of LUMA’s January 31st Motion. See *id.*

¹¹ See *Motion to Submit Responses to Requirements of Information Regarding CBES+ Proposal in Compliance with Resolution and Order of May 20, 2025, and Request for Confidential Treatment*.

¹² See *id.*, p. 3. The Energy Bureau directed LUMA to: (a) not cease or curtail dispatch of the CBES batteries during grid emergency situations, nor artificially limit the size of the CBES program in a fashion that would result in avoidable outages for non-participating customers, due to lack of budgeted funds; and (b) not to allow the procurement and initialization process for a DERMS system to delay or defer the expansion and use of the CBES resource. See *id.* The Energy Bureau noted that “at a later date following the summer 2025 period, the Energy Bureau will evaluate plans for continued enrollment of auto-enrolled customers past the end of fiscal year 2026 and address the minimum number of dispatch events and the appropriate process for un-enrollment for nonperformance.” *Id.*

¹³ See *id.* The Energy Bureau now required that these reports include: (a) information on the total program costs to date broken out by incentive and administrative costs, number of participants enrolled broken-out by auto-enrolled and opt-in, number of events called, average event duration, average event participation rate, average battery reserve level, total enrolled nameplate capacity per event, total enrolled nameplate energy, average event length, average total capacity per event, and average total energy per event; (b) notification with supporting assumptions if LUMA expected to exceed its planned budget; and (c) an individual event summary table like the table provided in Table 7: CBES Event-by-Event Summary on page 26 of Exhibit 1 of LUMA’s January 31 Motion, including the reserve level at the

III. Submittal of Monthly Report

10. In compliance with the May 20th Order and the May 29th Order, LUMA submits herein its monthly report on the CBES+, covering the month of August 2025. *See Exhibit 1*. Since the CBES+ is implemented together with the Permanent CBES, the attached report provides information on both programs.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned; and **accept** *Exhibit 1* herein in compliance with the Energy Bureau's May 20th Order and May 29th Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 22nd day of September 2025.

We hereby certify that we filed this Motion using the electronic filing system of this Energy Bureau and that we will send an electronic copy of this Motion the Independent Office for Consumer Protection at hrivera@jrsp.pr.gov; PREPA at arivera@gmlex.net; and mvalle@gmlex.net; and agraitfe@agraitlawpr.com; info@sesapr.org; bfrench@veic.org; evand@sunrun.com; jordgraham@tesla.com; forest@cleanenergy.org; customerservice@sunnova.com; javrua@sesapr.org; pjcleanenergy@gmail.com; cfl@mcpr.com; mqs@mevpr.com; and mrrios@arroyorioslaw.com.



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time of dispatch, the duration and capacity of any load shed event on the same day, and whether the CBES resource avoided the need for a load shed event. *See id.*

Exhibit 1

Monthly Status Report

CBES+

Reporting Period

August 2025

NEPR-MI-2022-0001

September 22, 2025





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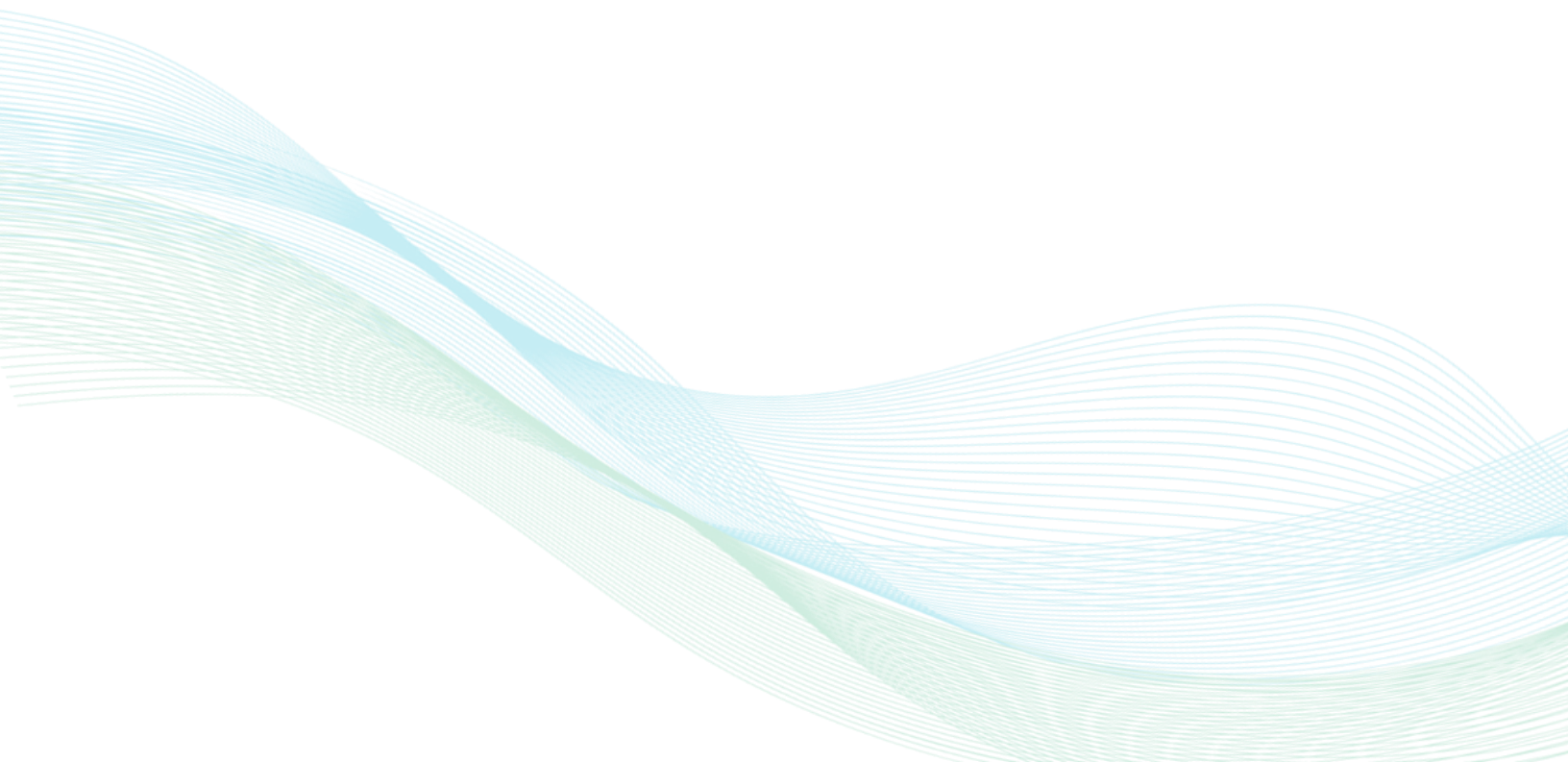
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Monthly Status Report CBES+

1.0 Introduction

In accordance with the Resolutions and Orders (R&O) dated in May 20, 2025 ("May 20th Resolution") and May 29, 2025 ("May 29th Resolution"), issued by the Puerto Rico Energy Bureau (PREB) in Case No.: NEPR-MI-2022-0001, In Re: Evaluation of Demand Response and Energy Efficiency (TPP), LUMA is required to provide monthly status reports on the Customer Battery Energy Sharing (CBES+) program for the summer 2025 season (June 1, 2025 - October 31, 2025). This report, in compliance with the May 20th Order and May 29th Order, outlines the key activities and progress achieved by LUMA regarding the CBES+ program.

2.0 CBES+ Program for the Summer 2025 Season (June 1, 2025 – October 31, 2025)

The CBES+ program continues to demonstrate its value as a critical component in strengthening grid stability and supporting peak demand management during the summer season. The program has contributed to supporting the mitigation of generation shortfalls by enabling the dispatch of distributed battery resources from both auto-enrolled and opt-in customers.

During the reporting month of August, CBES+ was actively dispatched in multiple events, reducing the load to the grid during high peak demand periods. These contributions not only supported system reliability but also showcased the program's flexibility in managing diverse participant resources through coordinated sub-group dispatching strategies. Furthermore, 13,013 new participants were incorporated into the CBES program. LUMA can confirm that the inclusion of additional participants is not expected to result in exceeding the allocated budget of \$21 million. LUMA will continue to monitor the budget closely and will notify the PREB as full utilization of the budget is reached.

Total Program Costs to Date (Broken out by Incentive and Administrative Costs).

In August, total program costs amounted to \$4,896,169.91. This includes \$98,580.63 in administrative costs, and \$4,797,589.28 in incentive costs.

Number of Participants Enrolled (Broken-out by auto-enrolled and opt-in).

As of August 31, 2025, a total of 13,480 customers had actively enrolled in the CBES program through the opt-in process. Additionally, 67,153 customers were enrolled via automatic enrollment by the end of the reporting period. This brings the total CBES+ program enrollment to 80,633 customers.

Number of Events Called

During August 2025, 16 CBES events were called.

Table 1: Number of Events Called

Month	Events Called
August	16

Monthly Status Report CBES+

Average Event Duration

The average event duration in August was 4 hours.

Average Event Participation Rate

The average participation rate was 82% in August.

Average Battery Reserve Level

The average battery reserve level was 73%, based on aggregator self-reported data.

Total Enrolled Nameplate Capacity

The total enrolled nameplate capacity was 491.1 MW.

Total Enrolled Nameplate Energy

The total enrolled nameplate energy was 1.2GWh.

Average Event Length

The average event length was 4.75 hours. The extended duration reflects the dispatch of battery sub-groups, a design implemented to ensure a safe and reliable ramping up and ramping down of energy in accordance with the recommendations of LUMA's System Operations team. Each sub-group is limited to no more than 20 MW, and each is dispatched in intervals no shorter than 15 minutes. As a result, while the overall duration of the event remains 4 hours for all participating batteries, the event length extends to 4.75 hours when accounting for staggered start times.

Average Total Capacity Per Event

The average total capacity per event was 42 MWh.

Average Total Energy Per Event

The average total energy per event was 198.1 MWh.

CBES+ Event-by Event Summary

See Table 2.

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Table 2: CBES+ August Event-by-Event Summary

Event Information			Participants		Event Statistics				
Date	Duration (Hours)	Start Time (AST)	Participating Customers	# of Participating Aggregators	Total Battery Energy Dispatched (KWh/Event)	Average Energy Per Participant (KWh/Event)	Total Battery Power Dispatched (KW)	Average Power Per Participant (KW)	Total Event Cost
1-Aug	4	6:30:00PM	43,668	7	192,713.37	4.4	42,211.69	1.0	\$ 240,891.71
4-Aug	4	6:30:00PM	44,226	7	195,130.70	4.4	41,607.18	0.9	\$ 243,913.37
5-Aug	4	6:30:00PM	44,141	7	199,228.51	4.5	42,465.52	1.0	\$ 249,035.63
6-Aug	4	6:30:00PM	58,224	7	194,584.85	3.3	41,486.63	0.7	\$ 243,231.06
12-Aug	4	6:30:00PM	58,371	6	196,763.53	3.4	41,950.08	0.7	\$ 245,954.41
14-Aug	4	6:30:00PM	58,988	7	199,421.23	3.4	42,359.86	0.7	\$ 249,276.54
15-Aug	4	6:30:00PM	58,317	7	189,650.47	3.3	40,240.81	0.7	\$ 237,063.09
16-Aug	4	6:30:00PM	58,383	6	151,089.01	2.6	32,033.36	0.5	\$ 188,861.27
17-Aug	4	6:30:00PM	55,030	6	137,046.92	2.5	29,042.30	0.5	\$ 171,308.65
18-Aug	4	6:30:00PM	70,482	7	213,796.86	3.0	45,310.06	0.6	\$ 267,246.08
19-Aug	4	6:30:00PM	70,157	7	220,980.20	3.1	46,842.31	0.7	\$ 276,225.25
20-Aug	4	6:30:00PM	69,802	7	221,213.18	3.2	46,895.61	0.7	\$ 276,516.48
21-Aug	4	6:30:00PM	69,657	7	203,574.70	2.9	43,166.08	0.6	\$ 254,468.38
22-Aug	4	6:30:00PM	69,063	7	217,201.24	3.1	46,055.45	0.7	\$ 271,501.54
25-Aug	4	6:30:00PM	69,350	7	227,731.73	3.3	46,667.26	0.7	\$ 284,664.66
31-Aug	4	6:30:00PM	68,603	4	208,737.91	3.0	44,180.90	0.6	\$ 260,922.39
Total									\$ 3,961,080.50

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Table 3: CBES Program Events and Minimum Load Shed (MLS) Avoidance – August 2025

Date	Hour	Total Reserve Level at the Time of Dispatch	MLS* Start Time	MLS End Time	MLS Duration	Capacity Load Shed Event	Avoided Load Shed
1-Aug	18:30	185	N/A**	N/A	0 Hours	N/A	Morning Forecasted Reserve Near 200 MW (207 MW). Also, Forced Outage on Costa Sur 6.
4-Aug	18:30	73	N/A	N/A	0 Hours	N/A	Help Avoid MLS
5-Aug	18:30	313	N/A	N/A	0 Hours	N/A	Morning Forecasted Reserve Under 200 MW (90 MW)
6-Aug	18:30	235	N/A	N/A	0 Hours	N/A	Morning Forecasted Reserve Under 200 MW (185 MW)
12-Aug	18:30	77	N/A	N/A	0 Hours	N/A	Help Avoid MLS
14-Aug	18:30	20	8/14/2025 20:23	8/14/2025 21:12	0.82 Hours	~15 MW ¹	Minimize MLS Effect
15-Aug	18:30	82	8/15/2025 17:28	8/15/2025 22:39	6.18 Hours	~147 MW ¹	Not Enough to Avoid MLS
16-Aug	18:30	623	N/A	N/A	0 Hours	N/A	Unclear Return to Service of San Juan CT 6 and AES 1 (414 Mw)
17-Aug	18:30	677	N/A	N/A	0 Hours	N/A	Unclear Return to Service of San Juan CT 6 and AES 1 (414 Mw)
18-Aug	18:30	200	8/18/2025 20:28	8/18/2025 20:31	0.05 Hours	~10 MW ¹	Morning Forecasted Reserve Under 200 MW (75 MW)
19-Aug	18:30	47	N/A	N/A	0 Hours	N/A	Avoided MLS
20-Aug	18:30	183	N/A	N/A	0 Hours	N/A	Morning Forecasted Reserve Under 200 MW (-1 MW)
21-Aug	18:30	8	8/21/2025 17:19	8/21/2025 21:39	5.33 Hours	~124 MW ¹	Minimize MLS Effect
22-Aug	18:30	310	N/A	N/A	0 Hours	N/A	Morning Forecasted Reserve Under 200 MW (34 MW)
25-Aug	18:30	248	N/A	N/A	0 Hours	N/A	Morning Forecasted Reserve Under 200 MW (90 MW)
31-Aug	18:30	470	N/A	N/A	0 Hours	N/A	Morning Forecasted Reserve Under 200 MW (196 MW)

*Manual Load Shed

** N/A = No MLS was executed.

¹ The MW loss values during the MLS are approximations. These figures are based on available system data, which may not fully capture the dynamic conditions at the time of the event.