

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

NEPR

Received:

Oct 31, 2025

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IN RE: ENERGY EFFICIENCY AND
DEMAND RESPONSE TRANSITION
PERIOD PLAN

CASE NO. NEPR-MI-2022-0001

SUBJECT: Transition of Sunnova's Demand
Response Aggregator Operations to SunStrong

**MOTION TO CONFIRM INTERIM AUTHORIZATION TO OPERATE UNDER SUNNOVA'S DR
AGGREGATOR CERTIFICATION AND REQUEST FOR CONFIDENTIAL TREATMENT**

TO THE HONORABLE ENERGY BUREAU:

COMES NOW, SunStrong Management, LLC ("SunStrong"), through undersigned counsel, respectfully submits the following:

I. Introduction

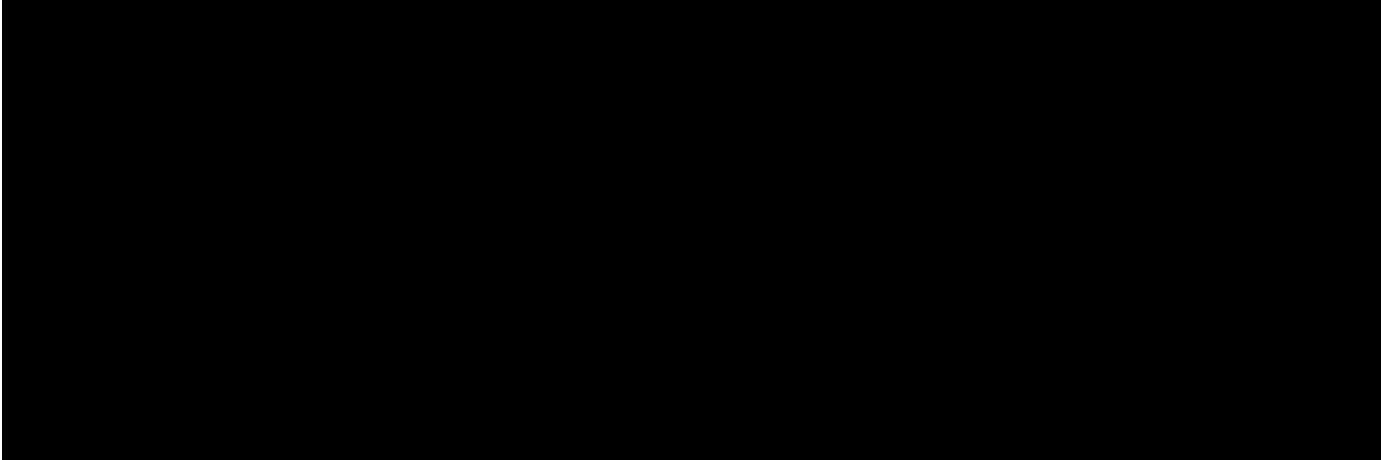
On October 13, 2025, LUMA Energy, LLC and LUMA Energy ServCo, LLC (jointly referred to as "LUMA") submitted an *Informative Motion Regarding Status of Sunnova's Participation in CBES and CBES+* (the "LUMA's Informative Motion") in the instant case. Therein LUMA informed the Honorable Puerto Rico Energy Bureau ("PREB" or the "Bureau") about recent developments affecting the participation of Sunnova Energy Corporation ("Sunnova") as a DR Aggregator in the Customer Battery Energy Sharing ("CBES") Program and its expanded version, CBES+. Specifically, LUMA's Informative Motion addresses Sunnova's Chapter 11 Cases (as defined below), the sale of certain of Sunnova's assets, and the assignment of Sunnova's Master Aggregation Agreement (the "MAA") to a new entity.

LUMA informed the PREB that it has been in communication with SunStrong regarding the necessary steps to become a Certified DR Aggregator, affirming its support to transition their

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participation as a DR Aggregator in the CBES Program (including CBES+). Notwithstanding, while the transition process is ongoing, LUMA paused the implementation of the MAA. Accordingly, LUMA informed that until this process is completed, the customers enrolled in the Permanent CBES Program or CBES+ serviced by Sunnova will not be participating in emergency DR events under the Permanent CBES Program or CBES+.



Accordingly, SunStrong further requests that the Bureau order LUMA to resume the implementation of the MAA and expedite any required approvals or amendments to immediately continue the enrollment and participation of customers serviced by Sunnova in emergency DR events under the Permanent CBES Program or CBES+. In particular, SunStrong requests that the Bureau order LUMA to approve Sunnova's Vendor Approval Renewal (submitted earlier this summer) and amend the MAA to raise the contract ceiling. In addition, SunStrong requests that the Bureau order LUMA to retroactively apply this resumption and any required approvals or amendments, where necessary, to any past CBES event reporting and reconciliation activities.

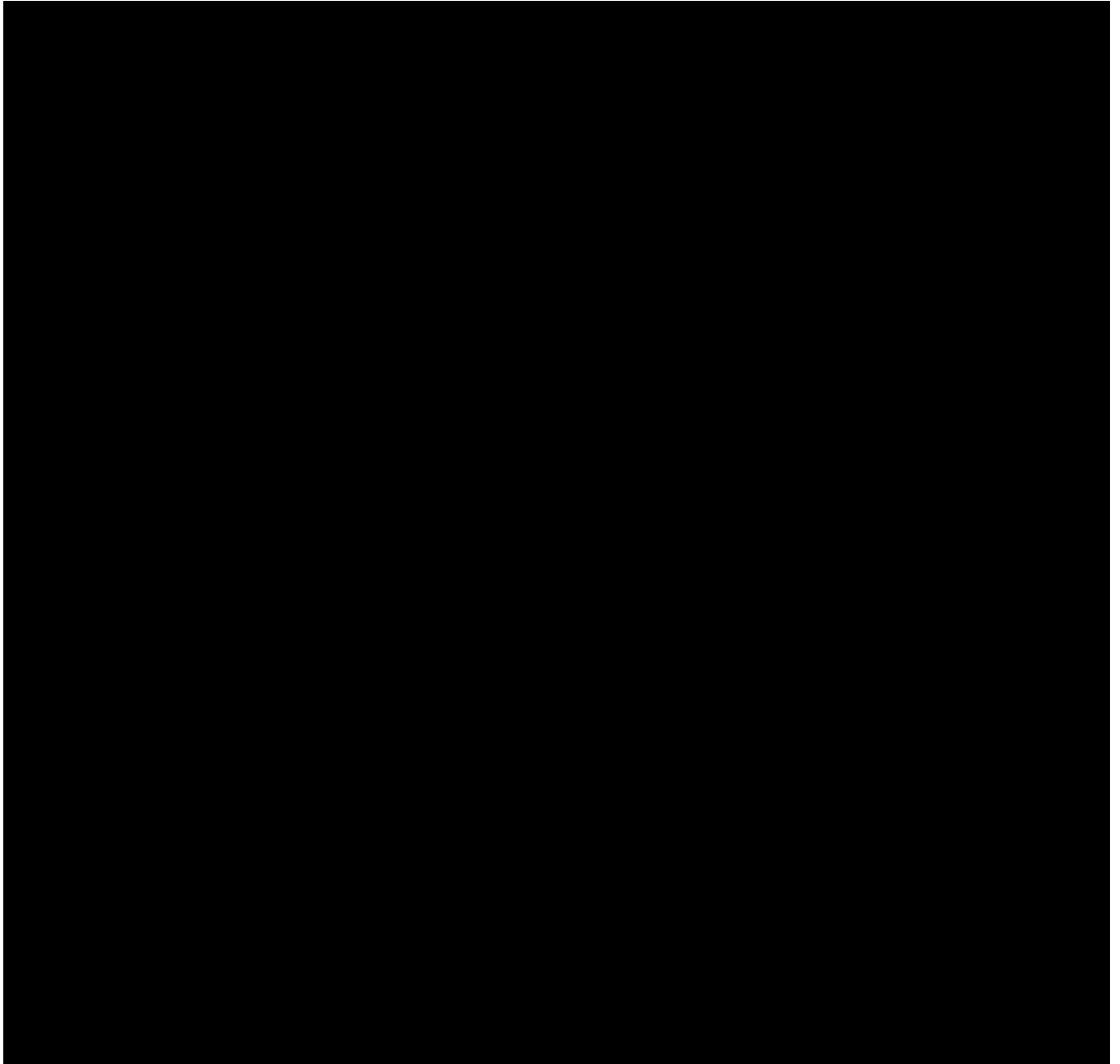
Furthermore, SunStrong hereby respectfully requests that confidential treatment be afforded to this motion and its corresponding attachments pursuant to the Energy Bureau's Policy on Management of Confidential Information, CEPR-MI-2016-0009, issued on August 31, 2016, as amended. In accordance with this policy, SunStrong will submit a Memorandum of Law in support of this request under separate cover.

II. Background

On June 9, 2025, Sunnova and certain of its affiliates (the "Debtors") filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code in the Bankruptcy Court,

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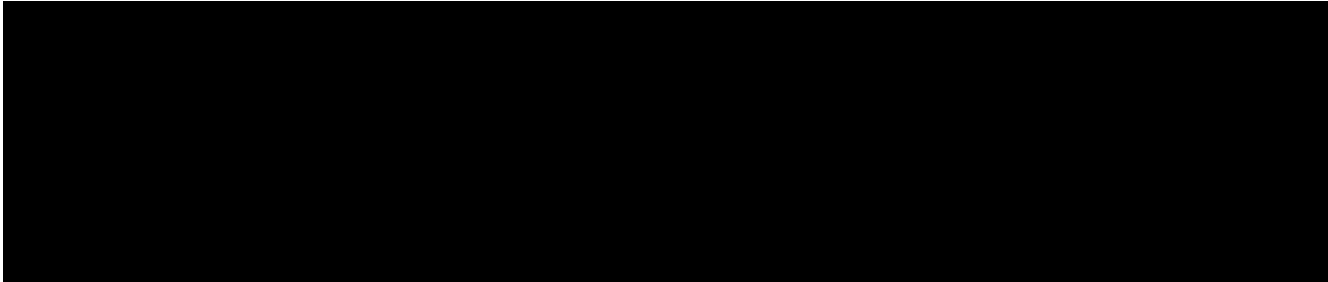
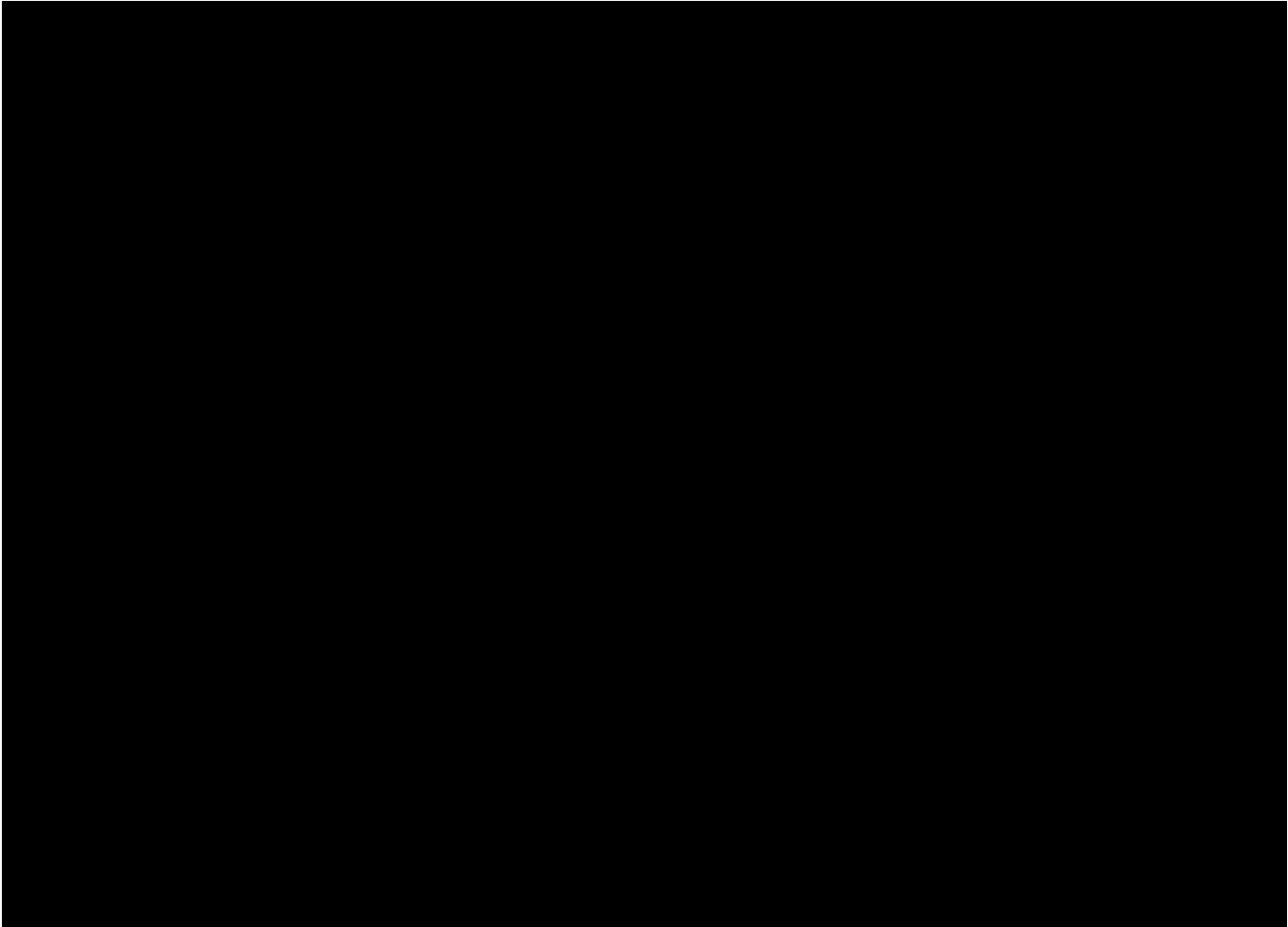
which chapter 11 cases are jointly administered under *In re Sunnova Energy International Inc., et al.*, Case No. 25-90160 (the “Chapter 11 Cases”).



On October 28, 2025, SunStrong filed its *Motion to Request Certification as an Electric Service Company and as a DR Aggregator and Request for Confidential Treatment* (the

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“Certification Motion”), thereby initiating the process to obtain its own PREB certification. As evidenced by the documents which accompany this motion, SunStrong has fully stepped into Sunnova’s contracts with LUMA.



This transitional structure ensures that the Bureau maintains regulatory oversight through Sunnova's ongoing transition and SunStrong's request for certification, while SunStrong carries out the operational and administrative responsibilities necessary to sustain the DR programs. It also ensures that LUMA and participating customers experience no disruption in service during the transition.

This request is necessary to ensure the uninterrupted continuation of critical demand response services in Puerto Rico, preserve stability for LUMA Energy and participating customers, and safeguard compliance with the Bureau's regulatory framework.

WHEREFORE, SunStrong Management, LLC respectfully requests that the Puerto Rico Energy Bureau: (1) Confirm that pursuant to the TSA, SunStrong may temporarily operate under Sunnova's Demand Response Aggregator certification pending final approval of SunStrong's own certification as an Electric Service Company and DR Aggregator; (2) Acknowledge that such interim operation is consistent with the Bureau's authority and the public interest in maintaining continuity of demand response service; (3) Order LUMA to continue the implementation of the MAA and continue the enrollment and participation of customers serviced by Sunnova in emergency DR events under the Permanent CBES Program or CBES+, including expediting any required approvals or amendments; (4) Order LUMA to approve Sunnova's Vendor Approval Renewal; (5) Order LUMA to amend the MAA to raise the contract ceiling; (6) Order LUMA to retroactively apply this resumption and any required approvals or amendments, where necessary, to any past CBES event reporting and reconciliation activities; (7) Approve SunStrong's request

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for confidential treatment of this motion and its attachments; and (8) Grant such other and further relief as the Bureau deems just and proper.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on October 31, 2025.

WE HEREBY CERTIFY that this Motion was filed using the electronic filing system of this Energy Bureau and that electronic copies of this Motion will be notified to the attorneys of the parties of record. To wit, to Luma Energy, LLC and Luma Energy ServCo, LLC through: laura.rozas@us.dlapiper.com; the Puerto Rico Electric Power Authority, through: jmarrero@diazvaz.law; the Independent Office for Consumer Protection at hrivera@jrsp.pr.gov; and agraitfe@agraitlawpr.com; info@sesapr.org; javrua@sesapr.org; bfrench@veic.org; shanson@veic.org; evand@sunrun.com; jordgraham@tesla.com; forest@cleanenergy.org; customerservice@sunnova.com; and mrrios@arroyorioslaw.com.

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