

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

NEPR

Received:

Nov 20, 2025

11:51 AM

IN RE: REQUEST FOR CERTIFICATION
SUNSTRONG MANAGEMENT
LLC

CASE NO. NEPR-CT-2025-0012

SUBJECT: Resolution and Order pertaining to Motion to Request Certification as an Electric Service Company and as a DR Aggregator and Request for Confidential Treatment and Motion to Confirm Interim Authorization to Operate Under Sunnovas's DR Aggregator Certification and Request for Confidential Treatment, filed by SunStrong Management LLC.

**MOTION IN COMPLIANCE WITH
NOVEMBER 13 RESOLUTION AND ORDER**

TO THE HONORABLE ENERGY BUREAU:

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

1. On October 28, 2025, SunStrong Management LLC ("SunStrong") filed before the Honorable Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Bureau") its *Motion to Request Certification as an Electric Service Company and as a DR Aggregator and Request for Confidential Treatment* ("October 28 Motion"). In that filing, SunStrong sought: (i) certification as an Electric Service Company, and (ii) certification as a Demand Response Aggregator ("DRA") pursuant to the Regulation for Demand Response, Regulation No. 9246 of December 21, 2020 ("Regulation 9246").
2. On November 13, 2025, the Bureau issued a Resolution and Order ("November 13 R&O") determining that SunStrong, acting as the asset manager for Solaris Capital Holdings,

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LLC and Solaris TEP H Purchaser, LLC (collectively, "Solaris"), does not qualify as an Electric Service Company because its role is limited to providing operational and administrative services. The Bureau further determined that Solaris must obtain certification as an Electric Service Company to lawfully provide electric service in Puerto Rico.

3. With respect to SunStrong's request for certification as a Demand Response Aggregator, the Bureau found that SunStrong satisfied the applicable requirements under Regulation No. 8701 and Section 2.02 of Regulation 9246. Accordingly, the Bureau granted SunStrong certification as a Demand Response Aggregator under the special circumstances of the Transition Period Plan and LUMA's Emergency Demand Response Program.
4. The Bureau also found that SunStrong had not yet submitted the customer complaint procedure required under Section 6.03 of Regulation 9246 and afforded SunStrong seven (7) days to file the required procedure.
5. SunStrong hereby submits its customer complaint procedure, attached as **Attachment 1**, and respectfully requests that the Bureau take notice and deem SunStrong in compliance with the November 13 R&O.

WHEREFORE, SunStrong Management LLC respectfully requests that the Honorable Bureau take notice of this *Motion in Compliance with November 13 Resolution and Order*, and declare SunStrong in compliance with the November 13 R&O.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on November 20, 2025.

McCONNELL VALDÉS LLC
Counsel for SunStrong Management LLC

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ATTACHMENT 1

Complaint Procedure

Should you have a complaint with SunStrong, your Aggregator, regarding the BEDRP, you may send an email stating your complaint to gridservices@sunstrongmanagement.com. Please place in the subject line "BEDRP Complaint." A representative from SunStrong will contact you within **2-4 business days** to discuss your complaint. Should your complaint concern the disclosure of private or proprietary information that may have been sold or disclosed by the Aggregator to market services or product offerings, SunStrong will investigate such complaint. The timeline for investigation and resolution of such complaint will be approximately three (3) months, subject to extension in the event information necessary for the investigation is not readily available. Any Participant who is dissatisfied with a determination by SunStrong in relation to a complaint or grievance related to the above may file a complaint with the Puerto Rico Energy Bureau. Such grievance will be resolved in accordance with the procedures set forth under Regulation 8543, available at <https://energia.pr.gov/wp-content/uploads/sites/7/2015/09/RE-8543-EN1.pdf>. A version of these procedures is available in Spanish at <https://energia.pr.gov/wp-content/uploads/sites/7/2015/09/RE-8543-ES.pdf>. Moreover, please be aware that you are entitled to reach out to the Independent Consumer Protection Office by phone at [\(787\) 523-6962](tel:7875236962) or by email at info@oipc.pr.gov. The above complaint procedure refers exclusively to complaints related to the BEDRP, and does not govern disputes related to your Customer Agreement with SunStrong, such disputes will be resolved per the terms therein.