

**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 October 2025, in Compliance with
Resolutions and Orders of May 20, 2025,
and May 29, 2025

**MOTION TO SUBMIT MONTHLY STATUS REPORT ON THE CBES+ PROGRAM
FOR OCTOBER 2025, IN COMPLIANCE WITH RESOLUTIONS 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 I*, the final monthly report on the CBES+, which also includes the Permanent CBES, covering the month of October 2025.

II. Relevant Background and Procedural History

1. On October 23, 2024, the Energy Bureau issued a Resolution and Order (“October 23rd 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 program (“Permanent CBES Proposal”).²

3. On April 3, 2025, the Energy Bureau issued a Resolution and Order (“April 3rd Order”) approving certain aspects of the Permanent CBES Proposal.³

4. On April 30, 2025, the Energy Bureau issued a Resolution and Order (“April 30th Order”) ordering LUMA to file a detailed proposal to expand the CBES program for summer

¹ See October 23rd 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 Order, p. 2.

2025, referred to as the “CBES Emergency Expansion” or “CBES+”, as presented by LUMA in a technical conference held on April 24, 2025.⁴

5. On May 8, 2025, LUMA submitted to the Energy Bureau its proposal for the CBES+ (“CBES+ Proposal”).⁵

6. On May 20, 2025, the Energy Bureau issued a Resolution and Order (“May 20th Order”) conditionally approving the CBES+ Proposal and the Permanent CBES Proposal, subject to certain conditions.⁶ 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.⁷

7. On May 29, 2025, the Energy Bureau issued a Resolution and Order (“May 29th Order”) determining that LUMA had met the conditions of the May 20th Order⁸ and fully approving the CBES+ Proposal. Among various directives relating to the implementation of the CBES+ and the Permanent CBES, the Energy Bureau established revised information requirements applicable to the monthly reports required by the May 20th Order.⁹

⁴ See April 30th Order, p. 2.

⁵ 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*.

⁶ See May 20th Order, p. 2 and Attachment A. In particular, the Energy Bureau required LUMA to submit responses to requirements of information regarding the CBES+ Proposal (“ROI”). See *id.*

⁷ 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.*

⁸ That is, the responses to the ROI.

⁹ 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 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.*

III. Submittal of the Final Monthly Report

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

9. Pursuant to both the May 20th Order and the May 29th Order, LUMA was ordered “submit monthly status reports on the CBES+ program for the summer 2025 season (June 1, 2025 – October 31, 2025).”¹⁰ Given that *Exhibit 1* covers the entire October 2025 reporting period, LUMA hereby informs that *Exhibit 1* constitutes the final monthly report for the CBES+.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned; **accept** *Exhibit 1* herein in compliance with the Energy Bureau’s May 20th Order and May 29th Order; and **determine** that LUMA has fully complied with the reporting requirements set in the Energy Bureau’s May 20th Order and May 29th Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 20th day of November 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 nzayas@gmlex.net; mvalle@gmlex.net; rcruzfranqui@gmlex.net; and agraitfe@agraitlawpr.com; info@sesapr.org; jordgraham@tesla.com; forest@cleanenergy.org; customerservice@sunnova.com; javrua@sesapr.org; pjcleanenergy@gmail.com; cfl@mcpr.com; mqs@mcvpr.com; and mrrios@arroyorioslaw.com.



DLA Piper (Puerto Rico) LLC
500 Calle de la Tanca, Suite 401
San Juan, PR 00901-1969
Tel. 787-945-9147

¹⁰ See May 29th Order, p. 3; *see also*, May 20th Order, p. 2.

Fax 939-697-6147

/s/ Laura T. Rozas

Laura T. Rozas

RUA No. 10,398

laura.rozas@us.dlapiper.com

Exhibit 1

Monthly Status Report

CBES+

Reporting Period

October 2025

NEPR-MI-2022-0001

November 20, 2025





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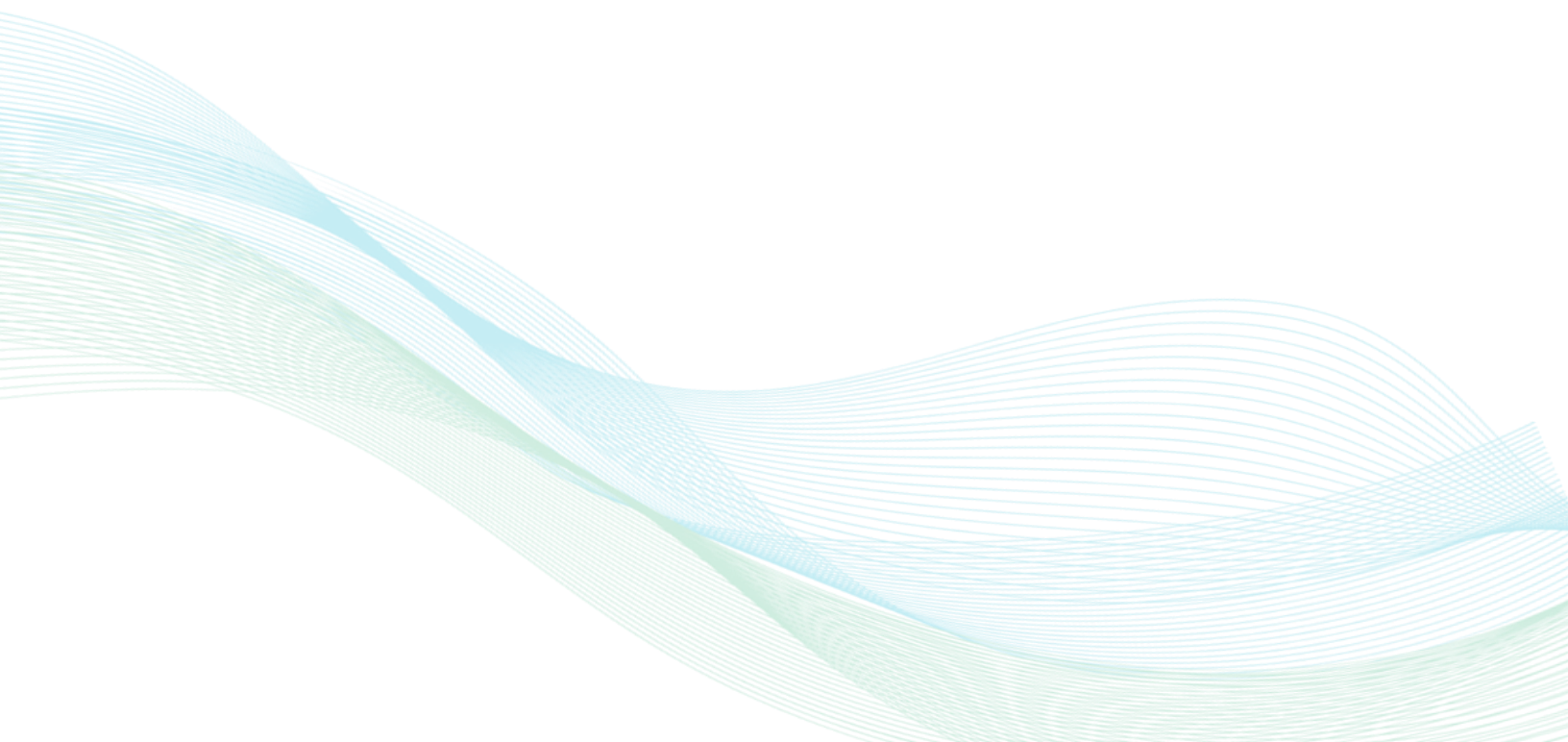
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Monthly Status Report CBES+

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.

LUMA will continue to provide CBES status reports via its Quarterly Transition Period Plan reports.

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 October, CBES+ was actively dispatched in thirteen 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.

The operational outcomes during the month of October reaffirm the critical role of CBES+ in maintaining system stability during periods of high demand. Looking to the need for CBES past the Summer 2025 period, LUMA consulted its System Operations team who concluded that CBES should continue to be available to support grid reliability in the near-term. System Operations anticipates that the grid will continue to experience generation shortfalls in the near term, and views CBES as a valuable resource to help mitigate the impacts of these shortfalls. In addition, System Operations has expressed support for maintaining the current program structure, which leverages both opt-in participants and auto-enrolled customers to provide energy dispatch capabilities during periods of grid stress, as this approach unlocks significantly more capacity to support the grid during emergency events.

Thus, LUMA plans to maintain the existing CBES framework which includes opt-in and auto-enrolled customers through the end of fiscal year FY28.

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

In October, total program costs amounted to \$1,972,890.78. This includes \$283,114 in administrative costs, which includes estimated cost for professional services, and \$1,699,776.78 incentive costs.

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

As of October 31, 2025, a total of 13,943 customers had actively enrolled in the CBES program through the opt-in process. Additionally, 67,161 customers were enrolled via automatic enrollment by the end of the reporting period. This brings the total CBES+ program enrollment to 81,104 customers.

Monthly Status Report CBES+

Number of Events Called

During October 2025, thirteen CBES events were called.

Table 1: Number of Events Called

Month	Events Called
October	13

Average Event Duration

The average event duration in October was 4 hours.

Average Event Participation Rate

The average participation rate was 39% in October¹.

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 499.5 MW.

Total Enrolled Nameplate Energy

The total enrolled nameplate energy was 1.26 GWh.

Average Event Length

The average event length was 4.25 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 4.25 hours when accounting for staggered start times.

Average Total Capacity Per Event

The average total capacity per event was 24.9 MW.

Average Total Energy Per Event

The average total energy per event was 104.6 MWh.

¹ This figure reflects the impact of the pause in the implementation of the Sunnova Master Aggregation Agreement (as reported in LUMA's October 13, 2025, Informative Motion regarding the status of Sunnova's participation in CBES and CBES+), along with other contributing factors.

Monthly Status Report CBES+

CBES+ Event-by Event Summary

See Table 2 below.

CBES Program Events and Minimum Load Shed (MLS) Avoidance

See Table 3 below.

Monthly Status Report CBES+

Table 2: CBES+ October 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-Oct	4	6:30:00PM	31,891	6	112,201.18	3.5	26,593.45	0.8	\$ 140,251.48
3-Oct	4	6:30:00PM	31,966	6	111,154.43	3.5	26,347.20	0.8	\$ 138,943.03
6-Oct	4	6:30:00PM	31,903	6	108,244.72	3.4	25,653.44	0.8	\$ 135,305.90
8-Oct	4	6:30:00PM	31,734	6	108,580.28	3.4	25,732.16	0.8	\$ 135,725.36
15-Oct	4	6:30:00PM	31,550	4	98,639.91	3.1	24,795.08	0.8	\$ 123,299.89
17-Oct	4	6:30:00PM	31,880	6	110,487.87	3.5	26,183.75	0.8	\$ 138,109.84
19-Oct	4	6:30:00PM	31,402	4	106,056.94	3.4	25,090.20	0.8	\$ 132,571.17
20-Oct	4	6:30:00PM	31,831	6	110,571.64	3.5	26,203.41	0.8	\$ 138,214.55
21-Oct	4	6:30:00PM	31,705	6	109,695.55	3.5	25,993.06	0.8	\$ 137,119.43
28-Oct	4	6:30:00PM	32,570	6	110,678.24	3.4	26,231.12	0.8	\$ 138,347.80
29-Oct	4	6:30:00PM	32,420	6	115,396.70	3.6	27,343.94	0.8	\$ 144,245.88
30-Oct	4	6:30:00PM	32,051	5	111,641.54	3.5	26,408.37	0.8	\$ 139,551.92
31-Oct	4	6:30:00PM	31,983	6	46,472.42	1.5	11,086.80	0.3	\$ 58,090.53
Total =									\$ 1,699,776.78

Monthly Status Report CBES+

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

Date	Hour	Total Reserve Level at the Time of Dispatch	MLS* Start Time AST	MLS End Time	MLS Duration	Capacity Load Shed Event (MW)	Avoided Load Shed
1-Oct	18:30	292	N/A	N/A	0 Hours	N/A	Morning forecasted reserve near 200MW (165MW)
3-Oct	18:30	189	N/A	N/A	0 Hours	N/A	Morning forecasted reserve near 200MW (-21MW)
6-Oct	18:30	380	N/A	N/A	0 Hours	N/A	Morning forecasted reserve near 200MW (-71MW)
8-Oct	18:30	294	N/A	N/A	0 Hours	N/A	Morning forecasted reserve near 200MW (265MW) Palo Seco 4 limited for the peak
15-Oct	18:30	345	N/A	N/A	0 Hours	N/A	Morning forecasted reserve near 200MW (279MW) Palo Seco 4 limited due to fuel problems
17-Oct	18:30	206	N/A	N/A	0 Hours	N/A	Morning forecasted reserve near 200MW (173 MW)
19-Oct	18:30	6	19:19	21:46	147 min	57.84	Not enough to avoid MLS
20-Oct	18:30	136	N/A	N/A	0 Hours	N/A	Morning forecasted reserve near 200MW (-6 MW)
21-Oct	18:30	524	N/A	N/A	0 Hours	N/A	Morning forecasted reserve near 200MW (91 MW)
28-Oct	18:30	56	N/A	N/A	0 Hours	N/A	Helped avoid MLS
29-Oct	18:30	72	16:33	16:40	7 mins	N/A	Not enough to avoid MLS
30-Oct	18:30	51	N/A	N/A	0 Hours	N/A	Helped avoid MLS
31-Oct	18:30	142	N/A	N/A	0 Hours	N/A	Morning forecasted reserve near 200MW (142MW)

*Manual Load Shed

** N/A = No MLS was executed.