

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

NEPR

Received:

Nov 21, 2025

1:35 PM

IN RE: REQUEST TO RENEW
CERTIFICATION OF
TESLA PUERTO RICO, LLC

CASE NO.: NEPR-CT-2023-0007

SUBJECT: Request to Renew Certification
as Electric Power Company and Demand
Response Aggregator

**REQUEST TO RENEW ELECTRIC POWER COMPANY AND DEMAND RESPONSE
AGGREGATOR CERTIFICATION**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW TESLA PUERTO RICO, LLC (“Tesla”), through the undersigned counsel, and respectfully states and requests as follows:

1. On January 22, 2024, the Puerto Rico Energy Bureau (“PREB” or “the Bureau”) issued a Resolution and Order granting Tesla’s certification as an *Electric Power Company* and a *Demand Response Aggregator* under Regulation No. 9246, *Regulation for Demand Response Programs in Puerto Rico* (the “Order”), and in accordance with the process established in Regulation No. 8701, *Amendment to Regulation No. 8618 on Electric Service Company Certification, Annual Fees and Operational Plans*.

2. The Order stated that Tesla’s certification was valid until June 30, 2025 and that Tesla could move for renewal at least thirty (30) days prior to such date.

3. Unfortunately, due to an administrative oversight and confusion as to previous resolutions issued by this Bureau, Tesla did not submit its renewal request within the prescribed timeframe. Tesla regrets this inadvertent delay and respectfully requests that the Bureau accept this belated

filing and proceed to renew its *Electric Power Company* and *Demand Response Aggregator* certification *nunc pro tunc*.

4. Most respectfully, Tesla states that it will implement appropriate internal checks and processes to ensure it timely requests renewals going forward and will utilize its external counsel to also track and notify Tesla of relevant regulatory timeframes.

5. Given the foregoing, and to ensure continued compliance with applicable regulatory requirements, Tesla respectfully submits this request to renew its *Electric Power Company* and *Demand Response Aggregator* certification.

6. Since its original certification, Tesla has continuously operated as a Demand Response Aggregator in Puerto Rico in compliance with all applicable laws, regulations, and Bureau orders.

7. Tesla continues to participate in the *LUMA Customer Battery Energy Sharing Program*, providing aggregation and coordination services to end-use customers who voluntarily participate in demand response activities. For reference, so far in 2025, Tesla has delivered 402 MWh of clean energy to the grid as an aggregator and has enabled participation of over 68,000 Powerwalls in collaboration with its partners. In the Summer, Tesla helped grid resiliency by reducing and/or eliminating potential load shedding events on multiple occasions.

8. Tesla remains duly authorized to do business in Puerto Rico, maintains its corporate registration in good standing with the Puerto Rico Department of State, and continues to meet all technical, financial, and operational requirements established under Regulation Nos. 8701 and 9246. *See* Updated Good Standing Certificate, **Exhibit 1**.

9. There have been no material changes in Tesla's corporate structure, operational scope, or contact information since the issuance of its initial certification. Should the Bureau require updated information, Tesla stands ready to provide all relevant documentation.

10. Tesla respectfully requests that the Bureau renew its certification as an *Electric Power Company* and *Demand Response Aggregator* under Regulation No. 9246 and issue an interim authorization allowing it to continue operating under its previous certification terms and conditions pending the Bureau's final resolution of this renewal request.

11. The requested renewal will serve the public interest by ensuring the uninterrupted operation of demand response activities that contribute to grid stability and energy efficiency.

WHEREFORE, Tesla respectfully requests that this Honorable Bureau: accepts this *Request for Renewal of Demand Response Aggregator Certification*, notwithstanding its late filing; renew Tesla's certification for a new term retroactively to June 30, 2025 to ensure continuity; and authorize Tesla to continue operating as an *Electric Power Company* and *Demand Response Aggregator* certified on an interim basis pending final disposition of this request.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on November 21, 2025.

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s/ Moraima S. Ríos Robles

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TSPR RUA - 17077



DEPARTMENT OF STATE
GOVERNMENT OF PUERTO RICO

EXHBIT 1

CERTIFICATE OF GOOD STANDING

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

CERTIFY: That, pursuant to Puerto Rico's General Law of Corporations, **TESLA PUERTO RICO LLC**, register number **401719**, a **for profit domestic** Limited Liability Company organized under the laws of Puerto Rico on **November 22, 2017**, has complied with the payment of its Annual Fees.



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

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: **846065-19518261**