

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

IN RE: ENERGY EFFICIENCY AND DEMAND
RESPONSE TRANSITION PERIOD PLAN

CASE NO: NEPR-MI-2022-0001

SUBJECT: *Urgent Motion for Clarification Regarding SunStrong's Participation as a DR Aggregator in the CBES Program and the Possible Impact of Solaris's Lack of Certification on the Implementation of the Master Aggregator Agreement*, filed by LUMA Energy, LLC and LUMA Energy ServCo, LLC.

RESOLUTION AND ORDER

On November 13, 2025, the Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") certified SunStrong Management LLC ("SunStrong") as a Demand Response Aggregator under the special circumstances of the Transition Period Plan and LUMA's¹ Emergency Demand Response Program and granted it seven (7) days to submit its procedure for addressing customer complaints established under Section 6.03 of Regulation 9246 ("November 13 Resolution").² The Energy Bureau further determined that because Solaris³ owns the generation assets managed and operated by Sunstrong and derives the economic benefit from the sale of electricity it is Solaris, not SunStrong, the entity that ultimately provides electric service within the meaning of the regulation and the one that shall be certified as the Electric Service Company to lawfully provide electric service in Puerto Rico.

On November 20, 2025, LUMA filed a document titled *Urgent Motion for Clarification Regarding Sunstrong's Participation as a DR Aggregator in the CBES Program and the Possible Impact of Solaris's Lack of Certification on the Implementation of the Master Aggregator Agreement* ("November 20 Motion"), whereby it requested the Energy Bureau to clarify whether LUMA could proceed with adding SunStrong as a DR Aggregator once it complies with the relevant regulatory framework, including filing of the referenced complaint procedure. In addition, LUMA requested the Energy Bureau to confirm whether the lack of certification of Solaris is an impediment to Sunstrong's ability to participate in the CBES⁴ Program.

The Energy Bureau certified Sunstrong as a DR Aggregator though the November 13 Resolution. Sunstrong's complaint procedure has been filed and is currently under review. Hence, the Energy Bureau **CLARIFIES** that LUMA may proceed with adding SunStrong as a DR Aggregator. Due to the nature of the functions of an aggregator, Solaris' lack of certification is no impediment to SunStrong's ability to participate in the CBES Program.

Be it notified and published.

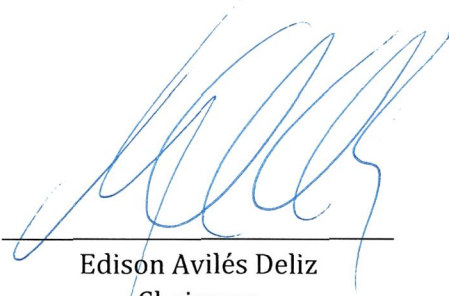
¹ LUMA Energy, LLC and LUMA Energy ServCo, LLC (referred to jointly as "LUMA").

² *Regulation for Demand Response*, December 21, 2020 (Regulation 9246).

³ Solaris Capital Holdings, LLC, Solaris TEP H Purchaser, LLC (collectively, "Solaris").

⁴ Customer Battery Energy Sharing.

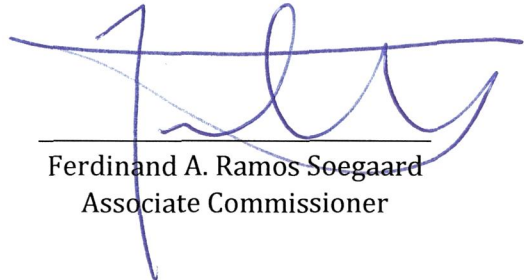




Edison Avilés Deliz
Chairman



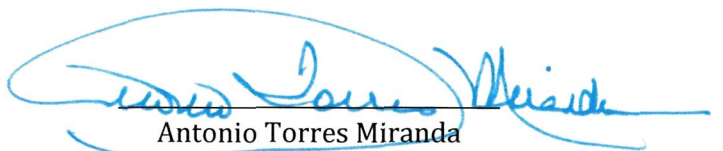
Lillian Mateo Santos
Associate Commissioner



Ferdinand A. Ramos Soegaard
Associate Commissioner



Sylvia B. Ugarte Araujo
Associate Commissioner



Antonio Torres Miranda
Associate Commissioner

CERTIFICATION

I certify that the majority of the members of the Puerto Rico Energy Bureau agreed on December 3, 2025. Also certify that on December 3, 2025. I have proceeded with the filing of this Resolution and was notified by email to: RegulatoryPREBorders@lumapr.com; katuska.bolanos-lugo@us.dlapiper.com; margarita.mercado@us.dlapiper.com; laura.rozas@us.dlapiper.com; alexis.rivera@prepa.per.gov; nzayas@gmlex.net; mvalle@gmlex.net; rcruzfranqui@gmlex.net, hriviera@jrsp.pr.gov; javrua@sesapr.org; mrios@arroyorioslaw.com; jordgraham@tesla.com; forest@cleanenergy.org; customerservice@sunnova.com; pjcleanenergy@gmail.com; agraitfe@agraitlawpr.com, info@sesapr.org; cfl@mcvpr.com; mqs@mcvpr.com.

I sign this in San Juan, Puerto Rico, today December 3, 2025.



Sonia Seda Gaztambide
Clerk

